

**GROWTH, ENVIRONMENT & TRANSPORT CABINET
COMMITTEE**

Tuesday, 7th July, 2026

10.00 am

Council Chamber

AGENDA

GROWTH, ENVIRONMENT & TRANSPORT CABINET COMMITTEE

Tuesday, 7 July 2026 at 10.00 am
Council Chamber, Sessions House, County Hall,
Maidstone.

Ask for: **James Willis**
Telephone: **03000 417831**

Membership (13)

Reform (8):	Mr J DeFriend (Chair), Mr T Mallon (Vice-Chair), Mrs M Lawes, Mr R Waters, Mr M Paul, Mrs B Porter, Mr D Sian and Mr A Thorp
Labour (1):	Mr A Brady
Liberal Democrat (1):	Mr T Prater
Green (1):	Mr M Hood
Conservative (1):	Mrs S Hudson
Restore Britain (1):	Mr P Thomas

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
- 4 Minutes of the meeting held on 05/05/2026 (Pages 1 - 24)
- 5 Verbal Update
- 6 Performance Dashboard (Pages 25 - 50)
- 7 26/00033 - Continuing the Visitor Economy and Inward Investment Service for Kent & Medway (Grow in Kent) (Pages 51 - 68)
- 8 Updated Kent Mineral Sites Plan- Regulation 19 Pre-Submission Plan and Updated Kent Minerals & Waste Development Scheme-Report (Pages 69 - 390)

- 9 26/00038 - Procurement and award of contract/s for Soft Landscape Urban Grass, Shrubs & Hedges (Pages 391 - 406)
- 10 26/00035 - Dover Border Access Improvement Project (DBAIP) (Pages 407 - 438)
- 11 Work Programme (Pages 439 - 440)

Motion to Exclude the Press and Public

That under Section 100A of the Local Government Act 1972 the press and public be excluded from the meeting for the following business on the grounds that it involves the likely disclosure of exempt information as defined in paragraph 3 of Part 1 of Schedule 12A of the Act.

EXEMPT ITEMS

(At the time of preparing the agenda there were no exempt items. During any such items which may arise the meeting is likely NOT to be open to the public)

Benjamin Watts
Deputy Chief Executive
03000 416814

Monday, 29 June 2026

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KENT COUNTY COUNCIL

GROWTH, ENVIRONMENT & TRANSPORT CABINET COMMITTEE

MINUTES of a meeting of the Growth, Environment & Transport Cabinet Committee held in the Council Chamber, Sessions House, County Hall, Maidstone on Tuesday, 5 May 2026.

PRESENT: Mr A Brady, Mr J Defriend (Chairman), Mr M A J Hood, Mrs. S Hudson, Mr T Mallon (Vice-Chair), Mr M Paul, Mrs. B Porter, Mr T Prater, Mr R Waters, Mr D Sian, Mrs. M Lawes, Mr P Thomas and Mr T Mole (Substitute)

ALSO PRESENT: Mrs Georgia Foster (Cabinet Member for Communities and Regulatory Services), Mr Jamie Henderson (Cabinet Member for Environment, Coastal Regeneration and Public Health), Mr David Wimble (Cabinet Member for Economic Developments and Special Projects), Mr Peter Osborne (Cabinet Member for Highways and Transport), Mr Spencer Dixon (Deputy Cabinet Member for Highways and Transport), Chris Burwash (Deputy Cabinet Member for Communities and Regulatory Services), Mr Mark Mulvihill (Deputy Cabinet Member Environment, Coastal Regeneration and Public Health) and Mr Ben Fryer (Deputy Cabinet Member for Economic Development and Special Projects)

IN ATTENDANCE:

Simon Jones (Corporate Director for Growth Environment and Transport), Stephanie Holt-Castle (Director of Growth and Communities), Steve Samson (Head of Economy), Tom Marchant (Head of Strategic Development and Place), Matthew Smyth (Director of Environment and Waste), Elizabeth Milne (Head of Environment), Graham Rusling (Head of PROW CL&VGS and Access), Natalie Liddiard (Head of Gypsy Roma Traveller Resident Service), Abigail Roscoe (Senior Assistant Project Manager), Shane Bushell (Head of Service: Public Transport), Richard Emmett (Head of Highways) and James Willis (Democratic Service Officer)

UNRESTRICTED ITEMS

78. Apologies and Substitutes

(Item 2)

Apologies were received from Mr Thorpe. Mr Mole was the designated Substitute.

An update on the Membership of the Committee was provided. Mrs Lawes and Mr Thomas had now joined.

79. Declarations of Interest

(Item 3)

No declarations of interest were received.

80. Minutes of the meeting held on 10.03.2026

(Item 4)

RESOLVED that the minutes of the meeting held 10 March 2026 were a correct record and that a paper copy be signed by the Chair.

81. Verbal Updates
(Item 5)

Georgia Foster (Cabinet Member for Communities and Regulatory Services), Jamie Henderson (Cabinet Member for Environment, Coastal Regeneration and Public Health), David Wimble (Cabinet Member for Economic Developments and Special Projects), Peter Osborne (Cabinet Member for Highways and Transport) Provided an update on the Following:

1.Mr Osborne, delivered his verbal update:

- a) Groundwork for the installation of electric chargers had commenced and work had also begun to support the Thameside Fastrack network. Once fully completed the entire network would be operating with electric vehicles.
- b) The Strategic Resilience Team (SRT) had commenced work with the Kent and Medway Resilience Forum, partner agencies, the Police, National Highways, and other authorities to develop plans for traffic management on the approaches to the Kents ports and Channel crossings.
- c) All UK nationals travelling to the EU were required to register under the Exit/Entry System (EES), which was likely to increase crossing times for those travelling across the Channel. It was noted that the full biometric system had not yet been implemented, with registration currently taking place at customs booths. These impacts were expected to add additional processing time for Operation Brock.
- d) Operation Brock would continue to be used for the foreseeable future with no viable alternative having yet to be identified. The SRT had been working with the Department for Transport (DfT) to explore technological alternatives, and it was suggested that any solution explored would unlikely provide a quick fix.
- e) Members were informed that Telent Technology Services (TTS) had successfully retained the maintenance contract for traffic systems assets across Kent following a comprehensive bidding and assessment process.
- f) The new contract had commenced on 1st April. The SRT had been working with TTS to align new processes and develop the associated performance measures. The transition was well underway and had progressed smoothly. No disruption to service delivery had been observed and positive engagement from Telent staff and strong leadership from the local contract manager were noted.
- g) The update highlighted that the previous Winter had been relatively mild. However, there had still been a spike in salt runs in January 2026 which had remained consistent with patterns observed in previous years.

- h) Between April 2025 and March 2026, more than 50,000 potholes had been repaired. A total of 35,000 potholes had been formally reported with 22,500 of those reports being submitted between January and March 2026.
- i) Despite unprecedented demand and significant pressure on services it was indicated that teams had demonstrated resilience, professionalism, and a strong commitment throughout the period. It was discussed that reducing the overall number of potholes remained challenging due to ongoing underlying factors.
- j) The new local highways maintenance contract had been launched with four new suppliers appointed to support patching and repair works. The Structures Fund had opened for scheme submissions. Only one bid per authority was permitted except in exceptional circumstances. KCC had submitted two bids: the primary bid for Galley Hill and a secondary bid for the A299 structures, tunnels and carriageway reconstruction.
- k) The Highways Asset Management Plan (HAMP) was commencing. A revision had been due this year and would now be required following the DfT letter on revised transparency reporting requirements and was to be expected to be released within the month.
- l) A new School Street trial had been launched at Snodland C of E Primary School to improve safety and the environment during drop-off and pick-up times. Temporary vehicle restrictions operated between 08:00–09:00 and 14:30–15:30, Monday to Friday and during term time.
- m) The Road Safety and Active Travel Group parish seminar had recently taken place. The session had provided practical content to support local engagement, and the team had shared resources and toolkits for parish use. Discussions throughout had been constructive and insightful.

2. Mr Wimble, delivered his verbal update:

- a) The Committee received an update on Skills Bootcamps. Strong outcomes continued to be achieved and during Wave 6 of the programme between July 2025 and March 2026, the programme had seen 500 learners enrolled. Of these, 92% had completed the bootcamp and gained a qualification. This had significantly exceeded the national average and outperformed set targets.
- b) It was reported that 43% of learners had already secured positive outcomes, including new employment, improved roles, or contracts for those who were self-employed. Members were advised that further outcomes were expected in the coming months. The remaining 8% who did not complete, most had left early due to securing employment which was discussed as an overall positive outcome.
- c) Members were informed that Wave 7 had commenced and had provided over 400 new learner places, supported by £1.5 million of funding from the Department for Work and Pensions. The programme covered priority sectors including health, construction, social care, and early years support. This had resulted in an aligning of the training provision with current labour market demands.

- d) The Committee also received an update on the first 9 months of delivery for the Connect to Work programme where the number of people reporting employment outcomes was increasing.
- e) From April 2026 delivery had been strengthened through the addition of two new partners. The Shore Trust and Forward Trust would work alongside existing education providers. The partnership aimed to support 9,000 individuals over the lifetime of the programme. The Cabinet Member indicated that this was a firm commitment rather than a target.
- f) The Kent and Medway Growth Hub had supported 1,400 businesses in the previous year, providing advice, guidance, and confidence to enable growth. Further updates were provided on financial support, noting that the Kent and Medway Business Fund had issued 38 loans totalling £5 million. This was recognised as direct investment into businesses, supporting job creation. Members were advised that the maximum loan value would be increased from £600,000 to £750,000 in the following year to further support business growth.
- g) The Committee received an update on tourism. In 2024 there had been 66 million visits and generating £4.1 billion for the local economy. This represented a return to pre-pandemic levels and had been achieved more quickly than been previously widely anticipated.
- h) It was reported that tourism supported over 82,000 jobs in Kent, accounting for 11% of total employment, and was therefore considered a key component of the local economy. Members were advised that promotional activity was ongoing. A recent St Pancras campaign had reached 13 million people through outdoor advertising, with a further 1.7 million reached digitally, promoting Kent's coast, countryside and gardens to London audiences. A dedicated campaign focusing on coastal towns was scheduled as the next phase of activity.
- i) Kent would be showcased nationally at the UK Real Estate Investment Forum in Leeds, alongside the Gatwick Economic Zone. It was emphasised that the area was not only open for business but was actively seeking inward investment.
- j) The continued importance of Kent's food and drink sector was discussed. The Taste of Kent Awards were confirmed to be returning for their 20th year, celebrating local producers and recognising the importance of identity, quality, and support for the county's businesses.
- k) An update was also provided on the No Use Empty programme. Over 9,000 empty properties had been brought back into use, creating homes and opportunities that would otherwise have remained vacant.
- l) It was further reported that the programme was now working in partnership with the Kent & Medway Business Fund. £3.8 million was being invested into two new projects to deliver 25 commercial units in New Romney and Thanet..

3. Mrs Foster delivered her verbal update.

- a) The Cabinet Member gave thanks to officers, recognising that briefings had been delivered with enthusiasm and that officers had been working diligently to arrange visits as part of the Member's induction into the portfolio. Appreciation was also recorded for the work undertaken by the previous Cabinet Member Mr Webb.
- b) The Committee was informed that Folkestone Library and Community Learning Centre had confirmed its opening date as Tuesday 29th May. The new facility was located in the town centre on Sandgate Road.
- c) The centre would provide modern classrooms and teaching spaces for adult learning courses, alongside both adult and children's library services, including access to the local history collection.
- d) The facility would also offer accessible spaces for reading, studying, learning and community events, as well as digital facilities, including free public Wi-Fi, computer access and would also accommodate birth and death registration appointments.
- e) Co-location projects in Kent had remained on track. Already completed were Stanhope, Temple Hill, Cranbrook and Sittingbourne, which were all co-located with family centres. The final two in the phase would be Queenborough and Cliftonville, which had progressed well and was expected to reopen in early June.
- f) Technology Enabled Live service (TELS) would again hosting drop-in sessions in libraries. Dates and locations for those would be announced soon.
- g) The Committee received a progress update on the refurbishment works at Manor Gate House Registry Office in Dartford. It was reported that the works had delivered a new ceremony space and improved office accommodation for staff.
- h) As a result, the service would require less space within the building. Ceremonies had already recommenced at the refurbished venue and that the service would now be actively promoting it as a ceremony location within Dartford.
- i) Positive updates were provided in relation to library services. The Committee was informed that James Fisher and Zachary Wells, who worked across libraries in Thanet, had been shortlisted in the Libraries Connected Awards in the Children and Young People category.
- j) The Committee was informed that the Culture and Creative Economy Service had secured a capital grant of £865,000 from Arts Council England's Creative Foundations Fund.
- k) Funding had been allocated to essential maintenance and capital works to safeguard the Turner Contemporary building. Investment would ensure that the gallery remained safe, accessible, and operational in the long term. The works were also expected to protect the building's infrastructure and support its continued ability to host exhibitions.

- l) The Committee received an update from Trading Standards regarding a significant fraud case which had recently concluded following several years within the court system.
- m) Members were informed that two individuals, operating as builders, had been found guilty after a nine-week trial at Crown Court. The case had involved 19 victims across Kent, with fraud totalling approximately £1.4 million. Sentencing was scheduled to take place later in the month.
- n) It was reported that a new Vape Compliance Officer had been appointed, with the role fully funded by Public Health. The officer would work in close partnership with the Illegal Tobacco Officer, the Youth Harm Reduction Officer, and apprentices funded by the Department of Health and Social Care to address underage sales and tackle illegal tobacco and vape activity across the County.
- o) Officers had also supported Kent Police in the closure of an illegal tobacco shop in Maidstone. It was highlighted that this action had been made possible through timely intelligence checks undertaken by the Innovation and Business Intelligence team. The team had played a major role in the identification of the landlords involved.
- p) Trading Standards activities at Kents ports were discussed. Joint working in partnership with the UK Border Force had resulted in the interception of two lorry loads containing over 300,000 illegal disposable vapes being smuggled through Kent.
- q) Members were also made aware of wider sector challenges, including reports in the press regarding abuse and threats of violence faced by Trading Standards officers from criminal gangs. Whilst it was acknowledged that these particular incidents had not occurred within Kent, the Committee recognised the risks and challenges faced by officers in carrying out their duties.

4. Mr Henderson delivered his verbal update.

- a) Kent County Council was developing a Coastal Regeneration Strategy aimed at bringing together existing programmes and partners to more effectively target support for coastal communities facing long-term challenges. The new strategy would focus on improving locations, strengthening town centres, visitor economy, and supporting jobs and skills through a coordinated approach.
- b) May was National Walking Month with a number of activities being promoted through Explore Kent to encourage walking for wellbeing and connection with nature. It was reported that efforts were being made to ensure accessibility across routes and Country parks. Work at Trosley Country Park to reduce health inequalities by removing barriers to outdoor activity for disabled people and those with long-term conditions was a notable example of the work that had been undertaken.
- c) Explore Kent had completed joint works to redesign the Ramsgate to Broadstairs section of the King Charles III England Coast Path map. The work

had focused on addressing practical issues such as safety, obstacles and user confidence. Feedback would be used to inform a more accessible map and in addition 12 participants were being trained as volunteer walk leaders to support inclusive local walks.

- d) Members were also informed that short accessibility videos, tailored walking guides and 360-degree imagery for the coastal path had been launched to aid users plan journeys and select suitable routes.

5. In response to comments and questions from Members, the discussion covered the following:

- a) Members queried if more funds could be allocated to the 'No-use empty' initiative. The relevant Cabinet Member responded that they would look to explore the request and indicated that further discussions would take place with Mr Collins (Deputy Leader) to explore the potential reallocation of funding.
- b) Officers responded to question on the numbers of care leavers that were attending Skills boot camps and advised Members that a specific figure relating to care leavers was not available at the time. Officers discussed the close working arrangements that were in place with the Adult Social Care leavers team to ensure that opportunities through Connect to Work and Skills Bootcamps were effectively promoted to this cohort.
- c) Concerns were raised on the impact of EES, and the traffic throttling measures in place to mitigate the impact to coastal areas. Officers highlighted that there were no legislative powers available to direct or redirect tourist traffic. Existing powers had allowed only for the holding of HGV traffic under Operation Brock; equivalent measures were not in place for general traffic management.
- d) The primary approach would therefore focus on providing timely information and guidance to the public, including journey planning, awareness of disruption, and identification of safe routes. It was further reported that contingency sites were under consideration should conditions worsen. Overall, the current position remained one of warning and informing to ensure that residents and visitors were aware of the prevailing situation.
- e) Members observed that provisions for the current financial year had reduced to 400 learner places and represented a decrease of around 20%. Officers explained that figures had been reconfigured due to a reduction of funding from the Department of Education.
- f) Queries on what lesson learnt had been garnered from the increased cost of maintaining the Turner Contemporary building. Officers advised that the KCC Infrastructure team would be responsible for overseeing and managing the Turner Contemporary building. It was further highlighted that lessons relating to the management and maintenance of the facility continued to be addressed on an ongoing basis by the infrastructure team.
- g) The Committee sought clarification on updated figures relating to the highway asset management backlog. Members were informed that the total backlog for all highway assets was currently estimated at just over £1 billion. This

compared to a previous figure of £770 million, which related solely to the highway network rather than all associated assets.

- h) Additionally, the estimate was being reassessed through a new asset condition survey. Based on earlier analysis, an indicative annual investment of approximately £150 million would be required to address the backlog.
- i) In response to further questions, it was clarified that the £1 billion figure had been rounded for simplicity and did not indicate a significant improvement from the previously reported total of £1.3 billion. A request was made for a detailed breakdown of the figures to be provided separately.
- j) Pothole repairs were discussed and Members asked if data was being collected on the outcomes of interventions, including the number of temporary measures in place, instances of failure were being collected by Officers. The Cabinet Member confirmed that the data set were collected.
- k) Returning to skills bootcamps, Members asked if the monitoring was undertaken over the short, medium and long term to track participant outcomes. Members urged the importance of following up on individuals who had completed the programme in order to assess the longevity of the impact and to inform continuous improvement, ensuring the programme delivered maximum value.
- l) The Committee was advised that there was a requirement, now overseen by the Department for Work and Pensions, to monitor learner outcomes for a period of six months following completion of Skills Bootcamps.
- m) Monitoring encompassed course completion and qualifications achieved. Key outcome measures such as job interviews for those unemployed, progression into enhanced roles for those already in work, and new contracts secured by self-employed participants were also captured.
- n) The Committee enquired if there were plans to further maximise the use of library assets through additional co-location opportunities. Reference was made to existing examples such as Temple Hill and the potential for integrating libraries with services including family hubs, skills provisions and care services.
- o) The associated Cabinet Member confirmed that co-location had remained an ongoing initiative, with sites being continually reviewed to assess their suitability for accommodating multiple services within a single building.

RESOLVED to note the Verbal Updates

82. Winter Service Update (Item 6)

Peter Osborne (Cabinet Member for Highways and Transport) and Richard Emmett (Head of Highways) were in attendance for this item.

1. Mr Osborne presented the following:

- a) The Committee received the annual update on Winter Services which outlined planning and delivery arrangements for the 2025–26 winter period, including the response to severe weather conditions.
- b) The report highlighted key areas of good practice, lessons learned, and actions being taken to maintain road safety and improve preparedness for the forthcoming winter season.

2. In response to comments and questions from Members, the discussion covered the following:

- a) Clarification on how salting routes were determined, including the extent to which crash data and lessons learned were used to inform route planning.
- b) Members asked how agile the process was, specifically whether live or emerging incident and crash data could be used to review, consult, and amend salting routes within the operational plan where necessary.
- c) The Committee was advised that crash data across the network was received from Kent Police, although there could be a delay of six to nine months before full reports were available, particularly in cases involving injury.
- d) Once received, this information was reviewed by the Casualty Reduction Team (CRT) and shared across highway services to inform learning and identify any necessary actions. It was further reported that where crash investigations identified issues with infrastructure, the authority had a duty to address these accordingly.
- e) The officer explained that understanding road-surface temperatures, combined with historic knowledge of the network, informed how roads were treated and supported an appropriate response during adverse weather conditions.
- f) Queried the reliance on farmers for snow-ploughing, highlighting concerns that rising insurance costs may deter participation. Asked whether any support or supplementary insurance mechanisms exist. Officers noted the issue and agreed to investigate further.
- g) Members requested that future reports include clearer information on road-condition trends, total expenditure for the service, and any implications for reserves.
- h) Officers acknowledged the concern and outlined the statutory obligations of the service. Operational reserves such as the 16,800 tonnes of salt (equivalent to 12 days' supply) were addressed as a key example of successful forward planning.
- i) In response to a number of suggestions, Members were advised that delivery followed the existing policy framework, and any changes would require further discussion with Cabinet Members and the administration. It was confirmed that

the service was currently budget-balanced, with resources fully aligned to deliver the existing Winter Service provision.

RESOLVED to note the Winter Service Update.

83. Tilbury-Gravesend Ferry Update
(Item 7)

Peter Osborne (Cabinet Member for Highways and Transport), Simon Jones (Corporate Director for Growth Environment and Transport) and Shane Bushell (Head of Service: Public Transport) were in attendance for this item.

1. Mr Osborne presented the following:

- a) The Committee was informed that, following Thurrock Council's withdrawal of funding and further engagement with partners, no alternative funding had been secured.
- b) Support would continue to be provided to the Port of London Authority as it led efforts to identify a viable commercial solution.

2. In response to comments and questions from Members, the discussion covered the following:

- a) The Committee expressed concerns that responsibility for the issue appeared to have shifted to the Port of London Authority following the withdrawal of funding by Thurrock Council, where it had previously been a joint responsibility.
- b) Members raised disappointment with the outcome and emphasised the importance of the service, particularly in relation to culture and economic development. It was discussed that funding had previously been drawn from similar sources to those used for bus services and that the current position would represent the likely end of the Gravesend–Tilbury Ferry service.
- c) The Cabinet Member addressed the concerns raised and advised that government guidance had clearly stated that any revival of the service would need to be financially self-sustaining, with no public subsidy.
- d) The Committee acknowledged the position, noting reports that Thurrock Council had engaged in discussions which confirmed that any future ferry service would need to operate on a fully self-sustaining basis.
- e) Discussed the negative impact to residents in Gravesham, Northfleet and the wider Dartford area, noting the loss as significant. Members expressed hope that options to reinstate the service could be explored in the future and committed to continuing to advocate for the ferry's restoration where possible.

- f) Officers explained that Thurrock Council had withdrawn its funding in 2024 and had been involved in tentative discussions with Kent County Council. However, (to date) Thurrock Council had not yet provided a definitive position on the future of the ferry and had not committed to any alternative funding arrangements.

RESOLVED to note the Gravesend-Tilbury Ferry Update.

84. 26/00020 - Kent Travel Saver (KTS)-Price Increase
(Item 8)

Peter Osborne (Cabinet Member for Highways and Transport), Simon Jones (Corporate Director for Growth Environment and Transport) and Shane Bushell (Head of Service: Public Transport) were in attendance for this item.

1.Mr Osborne presented the following:

- a) The Committee was informed that the Kent Travel Saver pass currently supported approximately 23,000 students to travel to school by bus through discounted fares.
- b) The cost of operating the scheme had increased, primarily due to higher charges from bus operators and rising demands. Whilst Government funding had provided some support, this would not fully offset the increased costs.
- c) It was reported that, in order to maintain the scheme's sustainability and affordability, a proposed annual fee increase of £35 for fee-paying users was being considered. The Cabinet Member elaborated that despite the increase, the pass would continue to represent good value for money when compared to standard bus fares and would safeguard support for those most in need.

2. In response to comments and questions from Members, the discussion covered the following:

- a) Concerns regarding the proposed increase impact to 3,100 low-income families, noting a rise of 26% (from £135 to £170 per child), equating to an overall additional cost of £108,000 were raised by a number of Members.
- b) Members queried the distribution of low-income passholders across districts and questioned the rationale for the scale of the increase, particularly in comparison to the previous year's 12.5% rise and average fare increases of around 6%. Concern was expressed that low-income families were being disproportionately affected.
- c) Further questions were raised regarding the role of bus operators, including whether the increase reflected operator requests or anticipated cost pressures. Members additionally queried on how cost increases were validated, including

whether access to operator financial data or audit mechanisms were in place to ensure that funding requests were justified.

- d) Officers explained that eligibility for the reduced-cost Kent Travel Saver pass were based on qualification for targeted free school meals, and that any eligible family in Kent would be able to apply for and receive the reduced fare.
 - e) The Committee was further informed that increases to costs were not directly set by operator requests but were calculated through a concessionary travel funding mechanism aligned with Department for Transport (DfT) requirements. It was explained that a formula determined reimbursement to operators based on journeys undertaken and reflected the fares that would otherwise have been paid.
 - f) Cost increases had been influenced by factors including rising operator fares and additional usage of the scheme, which had seen significant expansion in recent years.
 - g) Members questioned if operators were being reimbursed at an appropriate level under the concessionary travel scheme, referring to concerns that reimbursement rates might exceed the principle that operators should be “no better off and no worse off.”
 - h) Clarification was sought on how the Council challenged and verified operator claims to ensure that reimbursement accurately reflected actual foregone revenue and did not result in unintended profit.
 - i) Officers acknowledged the points and responded that the cost associated with each pass varied depending on usage. Members noted that the reimbursement mechanism included a “generation factor” within its calculation.
 - j) It was explained that this factor accounted for additional journeys generated as a result of the scheme being more attractive than standard commercial fares. The approach was intended to ensure compliance with the principle that operators should be no better off and no worse off overall.
 - k) Members suggested that the subject of operator profit be explored further at some point. The Committee queried the interaction between BSIP-funded subsidised routes and the Kent Travel Saver scheme.
 - l) Questions were raised whether the Council was required to reimburse operators for Travel Saver journeys on routes that were already subsidised, and if so, raised concerns that this could result in the Council effectively funding both the service provision and the passenger usage.
3. Additional comments and questions from Members, encompassed the following:
- a) The Committee was advised that bus service contracts were structured in two main ways. In some cases, operators retained passenger revenue, including concessionary reimbursements. This aspect would be reflected in their contract pricing through the competitive tender process.

- b) Officers discussed that the Council did not pay the full cost of the service, as anticipated revenue was considered. It was noted that contracts were increasingly structured so that the Council assumed the financial risk or benefit. In these instances, fare revenue had effectively operated as an internal funding mechanism between the Travel Saver scheme and the supported bus service budget. Officers reassured Members that the Council did not pay twice for the same service provision and passenger usage.
- c) In response to a question on projected costs, officers advised that increases within the scheme reflected assumed inflation in both the number of passes issued and the volume of journeys undertaken, as well as increases in the per-journey reimbursement rate. It was noted that there had been a consistent rise in pass numbers from 2021/22 through to 2024/25, with this growth largely driven by an increase in free and reduced-cost passes.
- d) The Committee further discussed a shift in the overall composition of passholders, with a decreasing proportion contributing full or partial payments. This trend was identified as a key factor contributing to the anticipated financial pressure for the forthcoming scheme year.
- e) Members asked if the full increase of £35 was necessary, although it was noted that this would be partially mitigated by the option for payment by monthly instalments.
- f) Raised questions regarding the financial assumptions set out in the report, noting that paragraph 5.1 identified £479,000 in inflationary pressures, while paragraph 5.3 projected £575,000.
- g) In additional income from the proposed £35 increase, leaving an apparent surplus of approximately £96,000. Members suggested that, based on these figures, there may be scope to reduce the level of increase, particularly for the 3,100 low-income passholders, and queried whether a smaller rise could be applied.
- h) The Committee therefore asked whether the remaining amount was being retained as a contingency or reserve, and whether this approach was appropriate in the context of the impact on users.
- i) In response officers advised that the final cost of the scheme would ultimately depend on actual usage over the course of the year, with a detailed methodology underpinning the calculation and advised that it was not possible to reliably predict a surplus at year-end. It was further indicated that any such surplus would likely be managed through existing mechanisms, including alignment with Bus Service Improvement Plan (BSIP) funding.
- j) Concerns regarding the application of a flat £35 increase across all users, noting that this represented a proportionally higher increase for those on reduced or supported fares compared to those paying the full cost.
- k) Members observed that this approach could place a greater financial burden on lower-income families and queried the rationale for applying a uniform increase rather than a percentage-based approach.

- l) Clarification on whether alternative models had been considered, specifically an option applying a consistent percentage increase across different fee bands to achieve the same overall revenue of £575,000, and why this approach had not been adopted.
- m) The Committee was advised that the approach to fee increases had considered the growing disparity between full-fare and reduced-fare users over recent years. Full-fare charges had increased considerably in the past, while reduced fares for low-income users had remained relatively stable. This had resulted in a widening gap between the two groups.
- n) Officers explained that further increasing full fares alone would have effectively required those users to continue subsidising reduced-fare users to a greater extent. It was explained that this had been a key consideration in the decision to apply a flat rate increase across the scheme.
- o) Members expressed strong concerns regarding the proposed flat £35 increase, noting that it placed a disproportionate burden on lower-income families and departed from the Council's previous approach of protecting those eligible for reduced fares.
- p) A recommendation was proposed and seconded that a percentage increase be explored. The recommendation was put to the vote:

The recommendation was put to the vote and unsuccessful.

- q) A recommendation was proposed and seconded to endorse the original decision:

The recommendation was put to the vote and was successful.

4. Mr Hood asked that his objection to the KTS price increase be noted in the minutes.

RESOLVED to endorse the proposed decision, namely:

- a) APPROVE the increase in the price of KTS and
- b) DELEGATE authority to the Corporate Director to take all relevant actions and decisions necessary for its implementation.

85. 26/00019 - A226 Galley Hill Road

(Item 9)

Peter Osborne (Cabinet Member for Highways and Transport). Simon Jones (Corporate Director for Growth Environment and Transport) and Abigail Roscoe (Senior Assistant Project Manager) were in attendance for this item.

1. Mr Osborne presented the following:

- a) The Committee received an update on the ongoing closure of Galley Hill Road, which had been in place since the collapse in April 2023 and continued to cause disruption to residents, the local road network, and bus services.
- b) Members were advised that the immediate priority following the incident had been to ensure public safety, including securing the site and undertaking detailed investigations and feasibility work to understand the cause of the collapse and identify viable options.
- c) The purpose of the report was to seek Member support to progress the preferred option to the detailed design stage. It was discussed that work would continue to secure external funding, including a pre-submission bid to relevant funding streams and also to pursue the recovery of costs from third parties.

2. In response to comments and questions from Members, the discussion covered the following:

- a) Members thanked the Dartford Councillors that had aided in the facilitation of resolving the issues around Galley Hill in addition the works and coordination of Highways and Transport officers was commended.
- b) The Committee placed on record its thanks for the submission of the Structures Fund bid and for the expenditure to date of just over £1 million in progressing a solution to the Galley Hill Road issue.
- c) Members asked that consideration be given to including a standing agenda item at future meetings to provide regular updates on the progress of the bid and the subsequent delivery of the project. This would be captured in future Cabinet Member verbal updates.
- d) Officers outlined that a draft submission to the technical advisory body was due to be submitted by 19 June. It was noted that feedback would be received on the draft and subsequently used to strengthen the final bid.
- e) Final submission deadline was scheduled for the 3rd of August, at which point a full and final proposal would be submitted for assessment by the Technical Advisory Body and the Department for Transport. It was further reported that funding decisions were expected in the autumn, with successful schemes required to commence reporting from 1 April the following year.
- f) The Committee was advised that a number of internal funding avenues had been explored. Originally anticipated internal funding had not been secured at the time of reporting, but an alternative solution had since been identified. As a

result, there was no current risk to progressing the scheme and the earlier funding concerns would no longer be considered relevant.

- g) Officers highlighted that further investigation was required to understand the root cause of the incident, including whether issues relating to utilities had contributed. In addition, there were a number of associated legal considerations that would remain under review.
- h) Members raised concerns on funds being drawn from elsewhere in the County to fund the Galley Hill works being of a negative impact. The Committee was advised that, in the event of an unsuccessful Structures Fund bid, further action would be pursued to recover the affected land and would include efforts to restore the road, subject to the outcome of ongoing investigations into liability for the defect.
- i) Clarification was sought on the two bids that had been submitted and the specifically the cost of £490,000 on the feasibility fund bid. Officers clarified that consideration had been given to utilising a feasibility reserve, described as a dedicated reserve within the authority to support the development of feasibility plans for structures and related projects. However, it was noted that this reserve was not currently available.
- j) Officers reported that work was therefore underway to explore how the required £490k could be secured, including consideration of other capital programmes and available funding within the highways and transportation portfolio. Confidence was expressed that the funding could be identified through a range of potential approaches.
- k) In addition, subject to a successful bid to the structures fund, the expenditure would be capitalised and allocated accordingly, ensuring that there would be no financial burden on the authority.
- l) Members were informed of the Structures Fund and the strong support for the scheme from the local MP and County Councillors. It was noted that a bid was required despite the clear need arising from the impacts at Galley Hill.
- m) Members acknowledged the need to consider next steps should the bid be unsuccessful, and it was placed on record that there was cross-party support for the project. The estimated cost of £50 million was noted, and it was expressed that it would be disappointing if the scheme did not proceed.

RESOLVED to endorse the proposed decision, namely:

- a) Progress the design through the next stages of development up to and including detailed design including any survey works.
- b) Give approval to carry out public engagement on the proposed scheme.

- c) Give approval to prepare and submit funding bids (including to the Structures Fund or successor programmes) to support the detailed design and development stage of the scheme.
- d) Give approval for any further decisions required to allow the scheme to proceed through to and including detailed design to be taken by the Corporate Director of Growth, Environment & Transport under the Officer Scheme of Delegations.

86. KMEF-Ambition 5
(Item 10)

David Wimble (Cabinet Member for Economic Developments and Special Projects), Stephanie Holt-Castle (Director of Growth and Communities) and Steve Samson (Head of Economy) were in attendance for this item

1.Mr Wimble presented the following:

- a) The Committee received the final in a series of five updates on progress with the Kent and Medway Economic Framework, which had been adopted in March 2024 by the Kent and Medway Economic Partnership, including local authorities, private sector representatives, and further and higher education partners.
- b) Ambition 5 had focused on promoting locations, with emphasis on the rural economy, the cultural and creative sectors, and opportunities to showcase the County nationally and internationally.
- c) Officers highlighted the role of the Kent and Medway Business Fund in supporting local firms within the creative and digital sectors. It was also reported that the Local Growth Plan (LGP) was being developed and would highlight opportunities for sector clustering, as well as future skills and employment priorities.
- d) The Committee was advised that a second focus related to creative places, including activity across districts to develop and promote cultural venues and enhance both resident and visitor spend.
- e) Third focus area addressed the rural economy, including support for agri-tech and agri-food businesses through Produced in Kent (PiK) membership. The Grow in Kent and Medway programme was also recognised for its contribution to innovation in the food and drink sector.
- f) The Committee was informed of ongoing work relating to the natural environment, including a cross-border geopark initiative with northern France. It was noted that a prospective UNESCO bid was being explored, which could support economic growth and business opportunities across protected landscapes on both sides of the Channel.
- g) Members received an update on the visitor economy, noting that the Visit Kent service had been brought in house in November. It was reported that plans

were in development for a forthcoming coastal campaign, alongside a campaign promoting viticulture.

- h) Recent promotional activity was highlighted, including collaborations with the high-speed rail service to London and billboard campaigns aimed at increasing footfall and raising awareness of Kent and Medway's visitor offer.

2. In response to comments and questions from Members, the discussion covered the following:

- a) The Committee acknowledged the importance of the film industry to Kent's economy and its potential contribution to the visitor economy. Members queried how activity relating to tourism and the film industry could be better aligned to maximise economic benefits, including opportunities to attract visitors, promote filming locations, and enhance the county's overall offer.
- b) It was advised that the Kent Film Office (KFO) had continued to play a key role in promoting the county as a filming location, supported by communications activity and local media coverage.
- c) Recent filming activity at Dungeness for an upcoming feature film were discussed and it was reported that such opportunities had been actively publicised to raise awareness. It was acknowledged that efforts would continue, within available budgets, to promote Kent and maximise the benefits of film activity for the local economy and visitor offer.
- d) Concerns were raised regarding the challenges posed by diminishing water supply in the context of planned development across Kent and highlighted the potential impact on the agricultural sector, particularly arable and livestock farming, noting that previous water shortages had led to serious consequences, including the loss of livestock. The Committee sought clarification on how these risks would be addressed going forward.
- e) The Cabinet Member responded to the concerns raised regarding water resilience, advising that there was unlikely to be any funding from central government for new water reservoirs and supplies in the foreseeable future.
- f) Members suggested exploring how additional external funding and investment could be leveraged to support economic development, particularly in light of pressures on existing resources.
- g) In response the importance of growing the visitor economy was highlighted, alongside recognition of recent efforts to strengthen this area. Updates were also sought on the potential reopening of Ashford and Ebbsfleet International stations, noting that this would have a significant positive impact on economic growth and connectivity within Kent.
- h) Despite budget constraints and the relatively small allocation for the visitor economy, there were initiatives in development aimed at increasing revenue and strengthening the promotion of Kent.

- i) Approximately £100,000 of private sector investment had been secured to support the visitor economy service within its initial months of operation. The new service was due to be formally launched to industry stakeholders at Leeds Castle, with partners and stakeholders, and that this was expected to support further revenue generation.
- j) An update was also provided on Ashford and Ebbsfleet International stations. It was reported that, while progress remained gradual, significant work was ongoing behind the scenes, including technical discussions and partnership working between KCC, district councils, Government departments, MPs, and London St Pancras high speed, with the aim of securing the reopening of both stations.

RESOLVED to note the KMEF-Ambition 5 Report.

87. 26/00026 - Position Statement on Solar Generation
(Item 11)

David Wimble (Cabinet Member for Economic Developments and Special Projects), Stephanie Holt-Castle (Director of Growth and Communities) and Tom Marchant (Assistant Director Strategic Development and Place) were in attendance for this item.

1. Mr Wimble presented the following:

- a) The Committee was advised that the proposal formed part of the Council's wider energy policy, originally established in 2014, and reflected a position consistent with national policy principle.
- b) Support remained for solar energy development in appropriate locations, such as rooftops and brownfield sites. However, it was emphasised that protecting the county's food economy was also a key priority.
- c) A position statement had been developed opposing large-scale solar developments and battery energy storage systems on high-grade agricultural land (Grades A1–A3). It was noted that this approach reflected the Council's stated policy position and would inform the development of the emerging energy policy.

2. In response to comments and questions from Members, the discussion covered the following:

- a) Members raised concerns on the legal status and scope of the position statement, as set out within the report. Members highlighted that the document was non-statutory, did not constitute formal policy, and would not be binding or determinative in planning decisions.

- b) Additionally, Members suggested that the statement appeared limited in scope, with no clear consideration of a wider spatial strategy for solar development, community involvement or ownership models, or the overall role of solar in supporting local energy resilience.
 - c) Members also highlighted the lack of reference to the economic implications for farmers, particularly the potential loss of income from land use diversification, and the absence of detail on how such impacts might be mitigated. Additionally, Members highlighted that there was limited discussion of long-term protections or strategic planning considerations.
 - d) The Cabinet Member introducing the item explained that the proposal had been brought forward in line with a policy commitment on which Members had been elected and was intended to form part of the Council's emerging energy policy, with the aim of strengthening its influence.
 - e) Concern was raised on the long-term impact of large-scale solar arrays, particularly in areas such as Romney Marsh, and had included potential environmental consequences at the end of the array's operational life and uncertainty over responsibility for remediation and clean-up costs.
 - f) It was suggested that the use of agricultural land for solar development should be considered only as a last resort, and that stronger opposition to such development within the county should be articulated. Reference was made to the importance of protecting the county's landscape and wider economic interests.
 - g) In response it was explained that the original proposal submitted to officers had been amended following advice that it could not be implemented to the extent originally envisaged.
 - h) Members additionally raised the political nature of the decision and noted that the purpose of the item was unclear, as the report lacked key definitions, including what constituted a large-scale solar array, and therefore lacked practical clarity although there was general agreement on prioritising rooftop solar and suggested that the Council should take greater action by installing solar panels on its own estate, including schools, with potential financial benefits.
- 3) It was proposed by Mr Thomas that the Committee simply note the Statement. This was seconded by Mr Prater and the Committee agreed

The meeting was adjourned for a comfort break

- a) Upon resumption of the meeting and before moving on to any other item of business, the Chair sought clarification from the Committee in relation to the proposed decision by the Cabinet Member to adopt the Solar Farm Position Statement. Specifically, with technical advice provided by the Clerk, the Chair explained that it was necessary to be clear as to whether the Committee was endorsing the decision, making specific recommendations or refusing to

endorse the decision, providing instead only a comment that the proposed Statement was noted.

- b) Following discussion by the Committee, including points of procedure raised by Members regarding the prior agreement to note the Statement, the Chairman continued the item, allowing Members to discuss the Statement further and to make any specific recommendations

3) A recommendation was proposed and seconded that consideration should be deferred until further detail was available within the forthcoming policy document, noting that the current paper was a high-level position statement with limited detail. It was recommended that a more comprehensive policy statement be brought back to the Committee for consideration and decision.

The recommendation was put to the vote and unsuccessful.

4) A Member proposed that the paper be endorsed, noting that any additional detail or granularity arising through subsequent policy development could be considered and scrutinised by the Committee at a later stage, thereby enabling progress to be made at this time. The recommendation was seconded.

RESOLVED by majority vote, that the proposed Cabinet Member decision, set out below, be endorsed:

- a) ADOPT the Solar Developments Position Statement.
- b) DELEGATE authority to the Corporate Director to take all necessary actions and make all consequential decisions to give effect to and implement the position statement.

88. 26/00018 - Prioritisation of Definitive Map Modification Applications
(Item 12)

Georgia Foster (Cabinet Member for Communities and Regulatory Services), Stephanie Holt-Castle (Director of Growth and Communities) and Graham Rusling (Head of PROW CL&VGS and Access) were in attendance for this item.

1. Mrs Foster presented the following:

- a) The Committee was informed that, over the past five years, the Public Rights of Way (PROW) team had been addressing a significant backlog of applications.

- b) A backlog had arisen following a surge in map modification applications, largely driven by public uncertainty linked to legislative changes and government policy regarding cut-off dates for recording historic rights of way.
- c) It was explained if applications continued to be processed strictly in order of receipt, it could take a further six to eight years to clear the backlog.
- d) The Committee was advised that a change in approach was recommended, whereby priority would be given to applications supported by user evidence, such as witness statements and first-hand accounts, rather than those based solely on historical documentation.

2. In response to comments and questions from Members, the discussion covered the following:

- a) Members supported the proposed change in approach and agreed that prioritising applications with user evidence was appropriate. Queries were raised on how many applications were triggered by the one-year rule and sought clarification on how this mechanism was being used in practice to accelerate the processing of applications.
- b) Officers advised that, although the provision to request accelerated processing via the Planning Inspectorate had been in place for some time, it was rarely utilised by individuals or organisation and that this was likely due to confidence in the Council's ongoing progress in addressing applications. However, a small number of such requests were received, and on occasion the Secretary of State instructed the authority to prioritise specific applications.
- c) The Committee asked whether footpaths that had been in continuous use for over 20 years could be determined immediately upon application. Members were advised that such applications would still enter the existing process and remain within the backlog, rather than being determined immediately. However, the revised approach aimed to improve operational efficiency and fairness by enabling applications supported by evidence to be progressed more promptly.

RESOLVED to endorse the proposed decision, namely:

- a) **APPROVE** the changes to the Statement of Priorities for Definitive Map Modification Order (DMMO) applications.
- b) **DELEGATE** to the Corporate Director of Growth, Environment and Transport, in consultation with the Cabinet Member for Communities and Regulatory Services to implement the approved amendment to the Statement of Priorities for Definitive Map Modification Order (DMMO) applications, including:
 - giving effect to the amended statement in operational practice.
 - making any minor, non-material drafting or presentational changes required to ensure clarity and accuracy; and

- issuing associated guidance or communications necessary to support consistent application of the amended priorities

89. 26/00017 - Adoption of Gypsy and Traveller Site Pitch Allocation Policy Amendments
(Item 13)

Georgia Foster (Cabinet Member for Communities and Regulatory Services), Stephanie Holt-Castle (Director of Growth and Communities) and Natalie Liddiard (Head of Gypsy Roma Traveller Resident Service) were in attendance for this item.

1.Mrs Foster presented the Following:

- a) Advised that the current policy had last been updated in 2023, with the revised version following a public consultation had received a limited response.
- b) Members noted that KCC owned, provided, managed and maintained seven sites across Kent. The refreshed policy had been clarified for applicants, with a small number of amendments introduced to align with housing allocation processes used by borough and district councils.

2.No questions were raised on the decision; Members endorsed the proposed decision.

RESOLVED to endorse the proposed decision, namely:

- a) ADOPT the Gypsy and Traveller Site Pitch Allocation Policy 2026
- b) DELEGATE authority to the Director of Growth & Communities to take all relevant actions and decisions necessary for its implementation, where such changes do not alter the intent of the policy and do not require further Member decision-making.
- c) DELEGATE authority to the Director of Growth & Communities or other officer (as authorised through the Council's Scheme of Delegation) as required to review the policy on an annual basis and revise the policy where changes do not require additional governance.

90. Work Programme
(Item 14)

The work programme was noted.

From: Peter Osborne, Cabinet Member for Highways and Transport

David Wimble, Cabinet Member for Economic Development & Special Projects

Jamie Henderson, Cabinet Member for Environment, Coastal Regeneration & Public Health

Richard Palmer, Cabinet Member for Community and Regulatory Services

Simon Jones, Corporate Director for Growth, Environment and Transport

To: Growth, Environment & Transport Cabinet Committee – 7 July 2026

Subject: Performance Dashboard

Classification: Unrestricted

Summary:

The Growth, Environment and Transport Cabinet Committee Performance Dashboard shows performance against targets set for Key Performance Indicators (KPIs). This is the fourth dashboard for 2025/26 and includes data up to December 2025.

Thirty-two of the 41 KPIs achieved target for latest performance and are RAG rated Green. Six KPIs are below target but did achieve the floor standard and are RAG rated Amber. Three KPIs are below their floor standards and are RAG rated Red.

Recommendation(s):

The Growth, Environment and Transport Cabinet Committee is asked to NOTE the Performance Dashboard.

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. To support this role, Performance Dashboards are regularly reported to Cabinet Committees throughout the year, with the most recent report having come before this Committee in March.

2. Performance Dashboard

- 2.1. The Dashboard provides a year-end report on performance against targets for the Key Performance Indicators (KPIs) for 2025/26. The current Growth, Environment and Transport Cabinet Committee Performance Dashboard is attached as Appendix 1.
- 2.2. This Dashboard provides results up to the end of March 2026.

- 2.3. KPIs are presented with RAG (Red/Amber/Green) ratings to show progress against targets. Details of how the ratings are generated are outlined in the Guidance Notes, included with the Dashboard in Appendix 1.
- 2.4. Of the three red KPIs in the report, one comes under Economy, and two under Highways and Transportation.
- 2.5. The red KPI under Economy is EC16: Number of people supported to access employment by the Connect to Work (CTW) programme; this programme delivers two models of supported employment: Individual Placement & Support (IPS) and Supported Employment Quality Framework (SEQF). The SEQF model performed close to expectations in 2025/26, with the main shortfall on Programme Starts occurring across Quarters 3 and 4 (October 25 to March 26) on the IPS model,. This model was new to our delivery partner (The Education People) who encountered challenges and delays in recruiting and training enough IPS-enabled staff to meet the targeted volumes. Staffing issues experienced during the year have now been addressed, and at the start of 2026/27 the CTW programme was performing ahead of expectations.
- 2.6. The two reds under Highways and Transportation are firstly, HT02 - All enquiries requiring a response, responded to within 28 days; this KPI saw performance decline over the last quarter of 2025/26 during the highest incoming enquiry demand seen in over 10 years. The second red KPI was HT08 - Emergency incidents attended to within 2 hours; Between January and March, multiple events occurred concurrently, and the high volume of simultaneous incidents resulted in teams falling short of the floor standard by 2–3 percentage points each month.
- 2.7. The Amber KPIs in the report are shared between, Economy, Community Protection, Strategic Development and Place, Highways and Transportation, and Environment and Circular Economy. Further details on these Amber KPIs and comments on their performance can be found in Appendix 1.

4. Recommendation(s):

The Growth, Environment and Transport Cabinet Committee is asked to NOTE the Performance Dashboard.

5. Contact details

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Growth, Environment and Transport Performance Dashboard

Financial Year 2025/26

Results up to end of March 2026

Produced by Kent Analytics

Guidance Notes

RAG RATINGS

Results in this report show either quarterly data or Year to Date (YTD) values.

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 the minimum performance expected and if not achieved must result in management action

Activity Indicators

Activity Indicators representing demand levels are also included in the report. They are not given a RAG rating; instead, they are compared with previous year or tracked within an expected range represented by Upper and Lower Expectations. The Alert provided for Activity Indicators is whether they are in expected range or not. Results can either be in expected range (**In Line**) or they could be **Above** or **Below**.

Key Performance Indicators Summary

Economy	RAG
EC05: Number of homes brought back to market through No Use Empty	GREEN
EC10: Businesses assisted via Kent and Medway Growth Hub contract	GREEN
EC11: Businesses assisted through intensive support provided via the Growth Hub contract	AMBER
EC12: Number of visitor economy businesses supported*	N/a*
EC13: Number of inward investment projects secured*	N/a*
EC14: Number of jobs created or safeguarded*	N/a*
EC15: Amount of loan funding awarded to local SMEs by the Kent & Medway Business Fund	GREEN
EC16: Number of people supported to access employment by the Connect to Work programme	RED
EC17: Number of people supported with upskilling through a Skills Bootcamp programme	GREEN
EC18: Number of new people receiving entrepreneurship mentoring support from Kent Foundation	GREEN

* Following the closure of Visit Kent and Locate in Kent in September 2025, KCC is no longer able to report on these KPIs. A new delivery model, with in-house visitor economy and inward investment functions and a new Brand Kent team, is now in place with new KPIs for 2026/27 reporting.

Libraries, Registrations and Archives (LRA)	RAG
LRA06: Customer satisfaction with Registration Services	GREEN
LRA15: Total number of customers attending events in Libraries and Archives	GREEN
LRA17: Number of volunteer hours adding extra value to the LRA service	GREEN
LRA12: Customer satisfaction with libraries	GREEN
LRA13: Customer satisfaction with archives	GREEN

Community Protection	RAG
CST02: % of Lessons Learnt Domestic Homicide Review attendees rating the event as good or better	GREEN
CST03: Percentage of service users who report feeling safer due to warden support	GREEN
COR02: Coroners' inquests held within 12 months of the date on which the coroner is notified of the death	GREEN
KSS02: Percentage of priority 1 food, feed and consumer products sample tests reported to clients within 5 working days	AMBER
KSS03: Percentage of independent proficiency tests rated as "good" or "satisfactory"	GREEN
TS05: Number of residents attending safeguarding from financial abuse presentation meetings	GREEN
TS06: Completed visits carried out by Trading Standards to higher-risk premises	GREEN
TS07: Number of engagements with businesses and partners aimed at preventing age restricted sales and reducing youth harm	GREEN

Appendix 1

Innovation & Business Intelligence	RAG
CP01: Percentage of the most vulnerable victims of scams recorded on the National Scams Hub supported by Public Protection	GREEN
CP02: Percentage of trader applications to the 'Trading Standards Checked' scheme processed within 10 working days	GREEN

Planning Applications	RAG
PAG01: Percentage of planning applications determined to meet DLUHC performance standards	GREEN
PAG02: Percentage of statutory planning consultee responses submitted to the local planning authority within 21 days (Minerals & Waste)	GREEN

Strategic Development and Place	RAG
DC08: Developer contributions secured against total contributions sought (section 106)	AMBER
PROW14: Percentage of Public Rights of Way (PRoW) faults reported online	AMBER
PROW16: Median number of days to resolve priority faults on public rights of way network (rolling 12-months)	GREEN

Highways & Transportation	Monthly RAG	YTD RAG
HT01 : Reported potholes repaired in 28 calendar days (routine works not programmed)	AMBER	GREEN
HT02 : Enquiries requiring a response, responded to within 28 days lic completed in 28 calendar days	RED	RED
HT08 : Emergency incidents attended to within 2 hours	RED	AMBER
HT12 : Streetlights, illuminated signs and bollards repaired in 28 calendar days	GREEN	GREEN
DT01 : Percentage of highway enquiries reported through the online fault reporting tool Highways Maintenance completed online	GREEN	GREEN
DT03 : Percentage of concessionary bus pass applications completed online	GREEN	GREEN
DT04 : Percentage of speed awareness courses booking completed online	GREEN	GREEN

Environment & Circular Economy	RAG
WM01 : Municipal waste recycled and composted	AMBER
WM11 : Municipal waste diverted from landfill	GREEN
WM03 : Waste recycled and composted at HWRCs	GREEN
WM08 : Overall score for mystery shopper assessment of HWRCs	GREEN
WM10 : Customer satisfaction with HWRCs	GREEN
EW2 : Greenhouse Gas emissions from KCC estate (excluding schools)	GREEN
EW1 : Percentage of statutory planning consultee responses submitted within 21 days	GREEN

Division	Director	Cabinet Member
Growth & Communities - Economy	Stephanie Holt-Castle	David Wimble

Ref	Performance Indicators	Mar-25 (Q4)	Jun-25 (Q1)	Sep-25 (Q2)	Dec-25 (Q3)	Mar-26 (Q4)	RAG	Target	Floor
EC05	Number of homes brought back to market through No Use Empty (rolling 12 months)	449	391	400	401	443	GREEN	400	360
EC10	Businesses assisted via Kent and Medway Growth Hub contract (Year to Date)	797	209	560	1,035	1,291	GREEN	1,236	1,051
EC11	Businesses assisted through intensive support provided via the Growth Hub contract (Year to Date)	79	22	37	71	109	AMBER	112	95
EC12	Number of visitor economy businesses supported (Cumulative from start of project 1.11.24)	390	468	468	*		N/a*	400	360
EC13	Number of inward investment projects secured (Cumulative from start of project 1.11.24)	18	24	26			N/a*	25	20
EC14	Number of jobs created or safeguarded (Cumulative from start of project 1.11.24)	379	840	1,280			N/a*	895	716

* Following the closure of Visit Kent and Locate in Kent in September 2025, KCC is no longer able to report on these KPIs. A new delivery model, with in-house visitor economy and inward investment functions and a new Brand Kent team, is now in place with new KPIs for 2026/27 reporting.

Division		Director				Cabinet Member			
Growth & Communities - Economy		Stephanie Holt-Castle				David Wimble			
Ref	Performance Indicators (quarterly figures are cumulative)	Mar-25 (Q4)	Jun-25 (Q1)	Sep-25 (Q2)	Dec-25 (Q3)	Mar-26 (Q4)	RAG	Target	Floor
EC15	Amount of loan funding awarded to local SMEs by the Kent & Medway Business Fund (Year to Date)	New KPIs in 2025/26	£1.97m	£2.30m	£2.84m	£3.8m	GREEN	£3m	£2m
EC16	Number of people supported to access employment by the Connect to Work programme - Kent only (Year to Date)		*	271	514	747	RED	1,210	847
EC17	Number of people supported with upskilling through a Skills Bootcamp programme (Year to Date)			210	300**	500	GREEN	500	350
EC18	Number of new people receiving entrepreneurship mentoring support from Kent Foundation (Year to Date)		12	31	39	63	GREEN	60	50

* The Connect to Work and Skills Bootcamp programmes did not go live until Quarter 2, so there was no reporting for Quarter 1.

** This figure has been updated from that previously reported which was incorrect

EC16 – The Connect to Work (CTW) Programme provides supported employment through two models: Individual Placement & Support (IPS), which accounts for 75% of delivery, and the Supported Employment Quality Framework (SEQF), which accounts for 25%.

Whilst SEQF performance was strong, reaching 98% of its 2025/26 target during year one due to the existing in-house expertise of the delivery partner (The Education People - TEP), IPS was a new model and delivery was affected by the need to recruit and train a new team within TEP.

Although the formal KPI was not achieved, the Kent & Medway programme was among the top five delivery areas nationally (out of 41) for number of referrals, programme starts, first and higher threshold earnings (job outcomes) reported during year one.

Performance has now improved with April 2026 starts exceeding the monthly target with future performance expected to continue at this level.

Appendix 1

Division	Director	Cabinet Member
Growth & Communities – Libraries, Registrations and Archives	Stephanie Holt-Castle	Richard Palmer

Quarterly KPIs

Ref	Performance Indicators	Mar-25	Jun-25	Sep-25	Dec-25	Mar-26	RAG	Target	Floor
LRA06	Customer satisfaction with Registration Services	96%	96%	97%	97%	96%	GREEN	96%	91%
LRA15	Total number of customers attending events in Libraries and Archives	60,907	57,292	70,932	53,239	58,620	GREEN	50,500	45,400
LRA17	Number of volunteer hours adding extra value to the LRA service	7,992	8,342	8,743	8,576	8,794	GREEN	7,900	7,200

Mar-26 (Q4): LRA06 – 1,503 customers were surveyed, 1,446 were satisfied.

Annual KPIs

Ref	Performance Indicators	2021/22	2022/23	2023/24	2024/25	2025/26	RAG	Target 2025/26	Floor 2025/26
LRA12	Customer satisfaction with libraries	94%	94%	95%	95%	95%	GREEN	94%	90%
LRA13	Customer satisfaction with archives	97%	98%	100%	98%	96%	GREEN	96%	91%

2025/26: LRA12 – 7,910 surveyed, 7,542 satisfied

2025/26: LRA13 – 134 surveyed, 129 satisfied

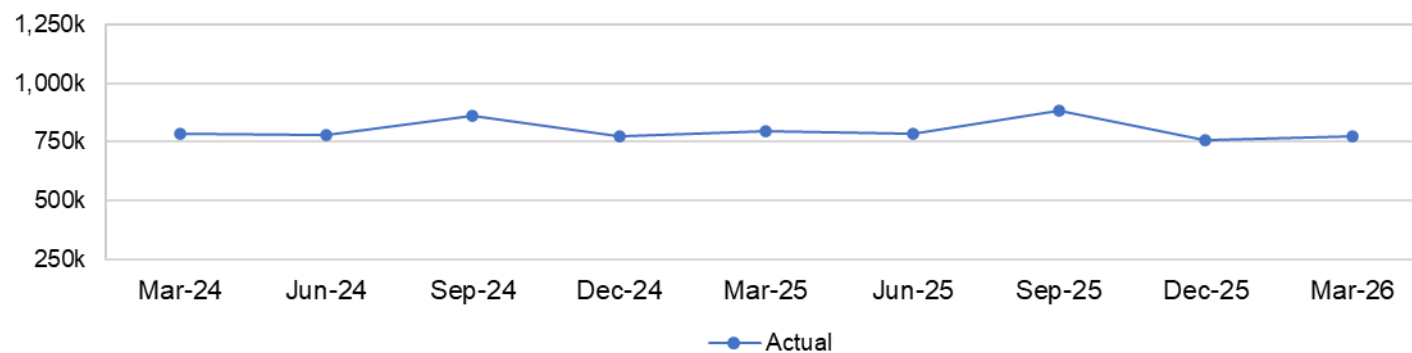
Activity indicators (Quarterly)

Ref	Activity Indicators (Quarterly totals)	Mar-25	Jun-25	Sep-25	Dec-25	Mar-26	Value vs Expected	<u>Expected Activity</u>	
								Upper	Lower
LRA01	Number of visits to libraries (including mobiles) (000s)	797	787	884	755	773	In line	799	759
LRA02b	Physical, e-book and e-audio issues (000s)	1,009	983	1,160	992	1,015	In line	1,056	1,003
LRA04	Number of wedding, civil partnership and citizenship ceremonies carried out by KCC Officers	915	2,165	2,821	1,501	935	In line	1,000	900
LRA25	Number of archive enquiries answered	New Indicator	2,329	2,269	1,768	2,512	Above	1,900	1,800

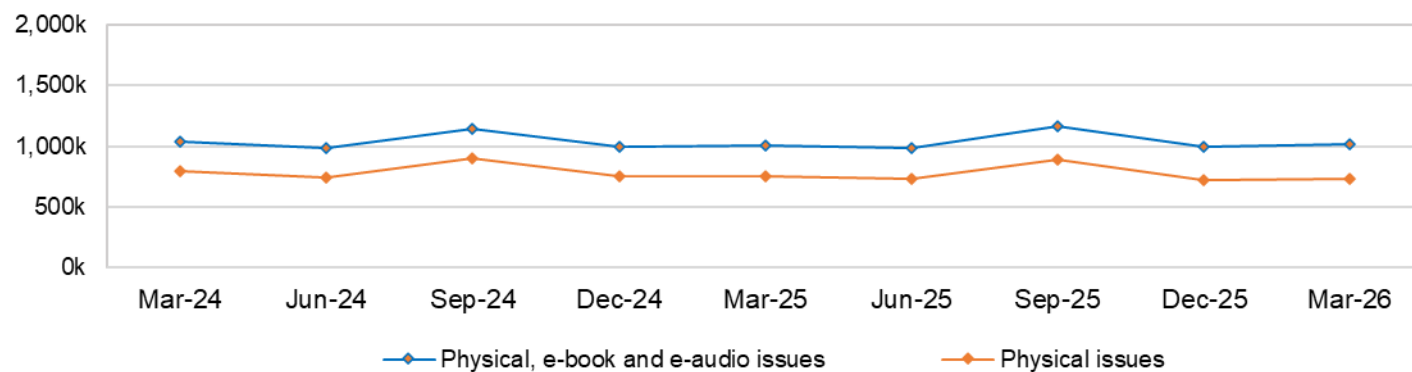
LRA25 – Although remote enquiries have remained steady for Quarter 4, with just two fewer enquiries made remotely than in the same period in 2024/25, enquiries in the Archive Search Room have increased by 4% in comparison with Quarter 4 2024/25. Archive customers are increasingly showing a preference for visiting the Archive search room in person and using the documents themselves. March 2026 was particularly busy, with 322 bookings, the highest number in one month to date post-Covid. This, coupled with the continued outreach work from the team to promote the collections, including the increasingly popular lunchtime talks, has resulted positively in much higher figures than anticipated, not only in Quarter 4 but across the year.

Division	Director	Cabinet Member
Growth & Communities – Libraries, Registrations and Archives	Stephanie Holt-Castle	Richard Palmer

Total number of physical visits to Kent libraries



Total number of book issues from Kent libraries



Appendix 1

Division	Director	Cabinet Member
Growth & Communities – Community Protection	Stephanie Holt-Castle	Richard Palmer

Ref	Performance Indicators	Mar-25 (Q4)	Jun-25 (Q1)	Sep-25 (Q2)	Dec-25 (Q3)	Mar-26 (Q4)	YTD 25/26	YTD RAG	Target	Floor
CST02	Percentage of Lessons Learnt Domestic Homicide Review (DHR) Seminar attendees rating the event as Good or better.	100%	98%	*	100%	100%	99%	GREEN	90%	81%
CST03	Percentage of service users who report feeling safer due to warden support	95%	74%	90%	82%	96%	82%	GREEN	70%	65%
COR02	Coroners' inquests held within 12 months of the date on which the coroner is notified of the death	New KPI in 2025/26	95%	94%	92%	93%	94%	GREEN	75%	65%

* No seminars were held.

2025/26: CST02 – 360 reviews, 356 rated events as good or better.

2025/26: CST03 – 184 surveys were returned, 151 responses indicated the service user felt safer.

2025/26: COR02 – 934 inquests held, 873 held within 12 months of notification of death.

Division	Director	Cabinet Member
Growth & Communities – Community Protection	Stephanie Holt-Castle	Richard Palmer

Ref	Performance Indicators	Mar-25 (Q4)	Jun-25 (Q1)	Sep-25 (Q2)	Dec-25 (Q3)	Mar-26 (Q4)	YTD 25/26	YTD RAG	Target	Floor
KSS02	Percentage of priority 1 food, feed and consumer products sample tests reported to clients within 5 working days	96%	91%	89%	93%	87%	90%	AMBER	93%	88%
KSS03	Percentage of external independent proficiency tests rated as “good” or “satisfactory” with a statistical Z score of 2 or less.	79%	89%	83%	80%	86%	85%	GREEN	75%	67%
TS05	Number of residents attending safeguarding from financial abuse presentation meetings	New KPIs in 2025/26	337	478	310	406	1,532	GREEN	1,500	1,320
TS06	Completed visits carried out by Trading Standards to higher-risk premises		104	95	115	131	445	GREEN	180	120
TS07	Number of engagements with businesses and partners aimed at preventing age restricted sales and reducing youth harm		299	228	103	41	671	GREEN	480	420

2025/26: KSS02 – 2,974 samples tested, 2,681 reported within 5 working days.

2025/26: KSS03 – 234 tests rated, 198 rated as good or satisfactory.

KSS02 – We first introduced this KPI and target in 2025/26, which has shown that the target was set at a very challenging level. Throughout the year, the team has worked to improve process times, including developing an in-house method for precise testing to reduce the need to send products to a partner laboratory. However, the volume of Priority 1 tests has increased significantly due to a growing customer base, which has had a small impact on performance. Therefore, we propose reducing the target to 90% and the floor standard to 85% for 2026/27.

Division	Director	Cabinet Member
Growth & Communities – Innovation & Business Intelligence	Stephanie Holt-Castle	Richard Palmer

Ref	Performance Indicators	Mar-25 (Q4)	Jun-25 (Q1)	Sep-25 (Q2)	Dec-25 (Q3)	Mar-26 (Q4)	YTD 25/26	YTD RAG	Target	Floor
CP01	Percentage of the most vulnerable victims of scams recorded on the National Scams Hub supported by Community Protection	*	100%	100%	*	*	100%	GREEN	90%	80%
CP02	Percentage of trader applications to Community Protection's 'Trading Standards Checked' scheme processed within 10 working days (<i>excluding those requiring enhanced checks by external organisations</i>).	100%	100%	100%	100%	100%	100%	GREEN	100%	90%

* No additional victims recorded

2025/26: CP01 – 4 people supported.

2025/26: CP02 – 385 trader applications processed, 272 were within 10 working days.

Division	Director	Cabinet Member
Growth & Communities – Planning Applications	Stephanie Holt-Castle	Jamie Henderson

Ref	Performance Indicators	Mar-25 (Q4)	Jun-25 (Q1)	Sep-25 (Q2)	Dec-25 (Q3)	Mar-26 (Q4)	YTD 25/26	YTD RAG	Target	Floor
PAG01	Percentage of planning applications determined to meet DLUHC performance standards	100%	100%	100%	100%	100%	100%	GREEN	100%	90%
PAG02	Percentage of statutory planning consultee responses submitted to the local planning authority within 21 days (Minerals & Waste)	84%	92%	100%	98%	100%	97%	GREEN	90%	80%

2025/26: PAG01 – 145 planning applications, all of which met Ministry of Housing, Communities and Local Government performance standard.

2025/26: PAG02 – 294 responses, 285 of which were within 21 days.

Division	Director	Cabinet Members
Growth & Communities – Strategic Development & Place	Stephanie Holt-Castle	David Wimble, Richard Palmer

Ref	Performance Indicators	Mar-25 (Q4)	Jun-25 (Q1)	Sep-25 (Q2)	Dec-25 (Q3)	Mr-26 (Q4)	YTD 25/26	YTD RAG	Target	Floor
DC08	Developer contributions secured against total contributions sought (section 106)	95.3%	100%	96.9%	97.7%	89.7%	92.6%	AMBER	98%	85%
PROW14	Percentage of Public Rights of Way (PRoW) faults reported online	88%	87%	85%	88%	87%	87%	AMBER	92%	86%
PROW16	Median number of days to resolve priority faults on public rights of way network (rolling 12-month figure)	8	14	9	8	8	N/A*	GREEN	10	15

* No Year-to-Date figure as this is a Rolling 12-month indicator

2025/26: DC08 - £40.9m secured.

2025/26: PROW14 – 6,226 faults reported, 5,404 were online.

2025/26: PROW16 – 179 priority faults resolved.

DC08 – The main reason the target has not been reached over the year, is due to financial viability issues at a number of sites, particularly at a large development at Court Lodge in Ashford in Quarter 4.

PROW14 – The target remains a deliberately challenging one which has increased over time as performance has improved. However, there remains a number of people who prefer to use other means to contact the council regarding public rights of way issues, rather than go online.

Division	Corporate Director	Cabinet Member
Highways & Transportation	Simon Jones	Peter Osborne

Key Performance Indicators

Ref	Indicator description	Dec-25	Jan-26	Feb-26	Mar-26	Month RAG	Year to Date	YTD RAG	Target	Floor	Prev. Yr
HT01	Reported potholes repaired in 28 days, of those becoming due	95%	95%	94%	87%	AMBER	91%	GREEN	90%	80%	96%
HT02	All enquiries requiring a response, responded to within 28 days	85%	80%	70%	66%	RED	76%	RED	90%	80%	88%
HT08	Emergency incidents attended to within 2 hours	98%	92%	93%	93%	RED	95%	AMBER	98%	95%	97%

Activity Indicators

Ref	Indicator description	Dec-25	Jan-26	Feb-26	Mar-26	Year to Date	In expected range?	<u>Expected Range</u> Upper Lower	
HT01b	Number of potholes due to be repaired in the month	2,011	1,793	2,970	4,423	22,777	Above	15,200	9,900
HT02b	Enquiries reported by the public due for completion in 28 calendar days	3,769	3,480	9,837	13,367	63,731	Yes	64,000	49,500
HT08b	Emergency incidents attended in the month	220	732	611	310	3,337	Above	2,880	1,920

HT01 - The number of potholes requiring repair vastly exceeded expected levels across Quarter 4, at 9,186 compared to 6,515 in the same quarter last year. Despite this very high demand, the target was only missed in March by 3 percentage points. This performance was aided by KCC Highways staff who are now able to address minor and urgent repairs directly, along with additionally allocated resources.

Appendix 1

HT02 - Performance fell across Quarter 4 as we saw the highest quarterly incoming enquiry demand in over 10 years. Due to the overwhelming volume, services and service managers worked to address high priority enquiries as efficiently as possible and continue to hold monthly performance meetings to improve performance.

HT08 - The number of emergency incidents exceeded expectations across Quarter 4, as we saw multiple concurrent events occurring. Due to the high number and simultaneous emergencies, teams fell short of the floor standard by 2-3 percentage points each month. From May, our new Highway Term Maintenance Contract (HTMC) commenced with Ringway, who have recognised the importance of this measure and will work with KCC to get performance back on track.

Division	Corporate Director	Cabinet Member
Highways & Transportation	Simon Jones	Peter Osborne

Key Performance Indicators

Ref	Indicator description	Dec-25	Jan-26	Feb-26	Mar-26	Month RAG	Year to Date	YTD RAG	Target	Floor	Prev. Yr
HT12	Streetlights, illuminated signs and bollards repaired within timescale*	94%	84%	90%	99%	GREEN	94%	GREEN	90%	80%	93%
DT01	Percentage of highway enquiries reported by the public using our online fault reporting too	68%	77%	84%	73%	GREEN	72%	GREEN	65%	60%	68%
DT03	Percentage of concessionary bus pass applications completed online	83%	81%	81%	80%	GREEN	79%	GREEN	75%	65%	77%
DT04	Percentage of speed awareness courses bookings completed online	89%	90%	88%	88%	GREEN	90%	GREEN	85%	75%	89%

* For priority jobs this is 28 calendar days

Activity Indicators

Ref	Indicator description	Dec-25	Jan-26	Feb-26	Mar-26	Year to Date	In expected range?	<u>Expected Range</u> Upper Lower	
HT06	Number of new enquiries requiring further action (total new faults)	5,956	14,914	16,358	8,775	97,423	Yes	106,000	88,600
HT07	Work in Progress (active enquiries/jobs) - end of month snapshot	6,501	10,256	12,475	8,676	N/a	Yes	8,700	6,900
HT13	Street work permit applications and change requests submitted	9,939	11,801	12,102	13,153	142,444	Yes	165,700	135,500

Division	Corporate Director	Cabinet Member
Environment & Circular Economy	Simon Jones	Jamie Henderson

Key Performance Indicators - Rolling 12 months except WM08 (Quarterly) and WM10 (Half-yearly)

Ref	Indicator description	Mar-25	Jun-25	Sep-25	Dec-25	Mar-26	RAG	Target	Floor
WM01	Municipal waste* recycled and composted	42%	42%	42%	43%	43%	AMBER	50%	42%
WM11	Municipal waste diverted from landfill	99.1%	99.4%	99.6%	99.6%	99.6%	GREEN	99%	95%
WM03	Waste recycled and composted at Household Waste Recycling Centres (HWRCs)	51%	51%	50%	52%	53%	GREEN	50%	45%
WM08	Overall score for mystery shopper assessment of Household Waste Recycling Centres	97%	97%	97%	97%	97%	GREEN	97%	90%
WM10	Customers satisfied with HWRCs	No Survey	97%	No Survey	96%	No Survey	GREEN	95%	90%

* Municipal waste is collected by Districts, and by KCC via HWRCs.

WM01 – The 50% target for this KPI is set out in the Kent Joint Municipal Waste Management Strategy agreed by the Kent Resource Partnership (KCC and district councils). Statutory ‘Simpler Recycling’ requirements for municipal waste came into force in March 2026, with further requirements for flexible plastics from 2027, it is anticipated that these changes will support a gradual increase in recycling rates as Waste Collection Authorities implement compliant services.

Division	Corporate Director	Cabinet Member
Environment & Circular Economy	Simon Jones	Jamie Henderson

Activity Indicators (Rolling 12 months)

Ref	Indicator description	Mar-25	Jun-25	Sep-25	Dec-25	Mar-26	In expected range?	<u>Expected Range</u> Upper Lower	
WM05	Waste tonnage collected by District Councils	560,878	554,940	553,347	554,427	558,360	Yes	570,000	550,000
WM06	Waste tonnage collected at HWRCs	113,947	115,688	116,172	118,129	118,437	Yes	125,000	105,000
05+06	Total waste tonnage collected	674,825	670,628	669,519	672,556	676,797	Yes	695,000	655,000
WM12	Household residual (non-recyclable) waste (Kg/HH)	528	522	521	517	515	Below	530	525
WM13	Reuse at the Household Waste Recycling Centres (HWRCs)	152	156	181	202	199	Yes	450	150

WM12 – Lower than expected residual waste per household is a positive sign, as this means less non-recyclable waste is being produced per household.

Division	Corporate Director	Cabinet Member
Environment & Circular Economy	Simon Jones	Jamie Henderson

Key Performance Indicator (rolling 12-month total, reported one Quarter in arrears)

Ref	Indicator description	Sep-24	Dec-24	Mar-25	Jun-25	Sep-25	Dec-25	RAG	Target	Floor
EW2	Greenhouse Gas emissions from KCC's overall estate and operations (excluding schools) in tonnes	10,323	10,388	10,252	9,613	9,290	9,342	GREEN	9,756	10,732

EW2 – The greenhouse gas emission target for Quarter 3, 2025/26 has been met with total greenhouse gas emissions of 9,342 tCO₂e compared to a target of 9,756 tCO₂e.

Although the target for Quarter 3 has been met, there has been an overall increase in emissions of 1.1% compared to the previous quarter. This is mainly due to heating fuel consumption now being reported more fully, meaning future reporting will be more accurate.

Key Performance Indicators (monthly)

Ref	Indicator description	Nov-25	Dec-25	Jan-26	Feb-26	Mar-26	YTD 25/26	YTD RAG	Target	Floor
EW1	Percentage of statutory planning consultee responses submitted within 21 days	94%	97%	93%	91%	92%	92%	GREEN	90%	80%

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From: David Wimble, Cabinet Member for Economic Development & Special Projects

Simon Jones, Corporate Director of Growth, Environment & Transport

To: Growth, Environment & Transport Cabinet Committee – 7 July 2026

Subject: Grow in Kent – Extension of Service

Decision no: 26/00033

Key Decision: The decision affects all wards in Kent.

Classification: Unrestricted

Past Pathway of report: [Decision - 25/00084 - Reinstating a Visitor Economy and Inward Investment Service for Kent & Medway](#)

Future Pathway of report: Cabinet Member Decision

Electoral Division: All KCC electoral divisions

Is the decision eligible for call-in? Yes

Summary: This report sets out the rationale for continuing, after 31 March 2027, the recently established in-house Visitor Economy (Visit Kent) and Inward Investment (Invest Kent) service for Kent and Medway, delivered through the Grow in Kent team.

The proposed decision is to continue the current in-house delivery model for the service until such time that the successor local government arrangements are implemented through Local Government Reorganisation (LGR) and devolution arrangements. The service will transfer to the successor authority/ies in accordance with statutory arrangements, thus ensuring continuity of delivery. The detailed future operating model will be determined by the successor body/ies.

Extending the service will ensure continuity of delivery which supports local economic growth, securing inward investment, provides assurance for industry, partners and stakeholders and maintains capacity and expertise for the county.

Recommendation(s):

The Growth, Environment & Transport Cabinet Committee is asked to endorse the decision to make permanent the operating model for the recently established in-house Visitor Economy (Visit Kent) and Inward Investment (Invest Kent) Service for Kent & Medway as shown in Appendix A.

1. Introduction

- 1.1 Visitor economy and inward investment services are essential components of local economic development, supporting business growth, job creation, productivity and place competitiveness. They play a central role in shaping how Kent locations are perceived by external audiences, influencing both visitor behaviour and business investment decisions, and contributing to the overall economic resilience and competitiveness of Kent and Medway.
- 1.2 Kent & Medway's Visitor Economy is worth £4.1bn annually and its 6,000 businesses support more than 82,000 jobs (11% of the county's employment). All industry sectors are supported by inward investment activity which brings new business, opportunities and growth opportunities to the county.
- 1.3 The Grow in Kent team delivers Kent and Medway's in-house visitor economy (Visit Kent) and inward investment (Invest Kent) functions following the closure of Visit Kent and Locate in Kent in September 2025. These services provide a coordinated approach to destination management, place promotion and inward investment, forming a core part of Kent County Council's approach with Medway Council to economic growth and competitiveness.
- 1.4 Key decisions were taken by Kent County Council and Medway Council in 2025 to bring the services in house, hosted by KCC, with initial arrangements put in place until 31 March 2027. The in-house delivery model has already gained wide support from stakeholders and industry and remains essential for supporting and promoting Kent & Medway's visitor economy offer and investment offer. It is recommended that the current arrangements continue to avoid any disruption in delivery and maintain this strategically important function for the county.

2. The Grow in Kent Service

- 2.1 Services were previously delivered through externally commissioned organisations – Visit Kent and Locate in Kent. Following the closure of both organisations in September 2025, Kent County Council, in partnership with Medway Council, established a new in-house, partnership-led service (Grow in Kent) to ensure continuity of key functions. This transition was delivered at pace to retain specialist capability, protect established networks and relationships, and ensure that the county continued to be represented in competitive national and international markets. It should be noted that the new service has considerably less resource, in both financial and staffing terms, than the previous organisations with a team of only six officers forming the in-house team compared to more than 25 staff working at Locate in Kent and Visit Kent.
- 2.2 The Grow in Kent model brings together visitor economy and inward investment functions within a single, integrated service. This approach aligns destination management, place marketing and investment promotion behind a shared strategic narrative, enabling Kent and Medway to present a clearer, more consistent and more regionally, nationally and internationally competitive

offer to investors, businesses and visitors. The current model also strengthens coordination across local partners and supports delivery at the scale of the Government's preferred 'functional economic area', in line with national policy expectations and the emerging devolution agenda.

- 2.3 Since its establishment, the new service has focused on stabilising delivery and rebuilding core capability following a period of disruption. This has included re-establishing key communication channels, securing and deploying legacy assets (including digital platforms and brand), rebuilding stakeholder and partner engagement, and restoring a coordinated approach to business support, sector engagement and place promotion. Engagement with district partners, businesses and industry stakeholders has been a key component of this work, ensuring that delivery reflects local priorities and opportunities across Kent and Medway.

2.4.1 Key achievements to date include the following;

2.4.2 The service has now moved beyond initial stabilisation and has begun to deliver a programme of activity that is re-establishing Kent and Medway's external profile and market presence.

2.4.3 Within the visitor economy, recent activity has included the relaunch of Visit Kent in May 2026 with industry stakeholders, supported by targeted sector engagement activity, including county-wide partner events bringing together tourism businesses and stakeholders.

2.4.4 Three destination campaigns have been delivered including activity with London St Pancras resulting in more than 13m impressions, a place-marketing campaign ("The Kent Coast: More Than You've Heard") has been launched with 1.6m impressions across digital platforms during the first month and a 'Kent Rediscovered' campaign in nearby counties leading to 2.8m impressions. Such campaigns result in increased visitor number and spend.

2.4.5 The team has also facilitated several journalist and influencer visits and has been working with industry body 'UK Inbound' to raise the profile of the county's tourism offer to a wide range of international audiences.

2.4.6 For inward investment, the Invest Kent function has been re-established with a renewed focus on pipeline development (currently some 200 business leads), investor engagement and the promotion of strategic opportunities across the county. This has included the launch of a new Invest Kent website, providing a single, coherent entry point for investors and bringing together priority sectors, commercial property and development opportunities.

2.4.7 The service has also re-established Kent's presence at national investment events, including participation in UKREiF (The UK's Real Estate Investment and Infrastructure Forum), where activity included hosting dedicated networking events and engaging with investors, developers and national partners as well as showcasing an investment prospectus. This

has supported the generation of new commercial leads and strengthened relationships with key national organisations.

2.4.8 Plans are also underway for a new corporate partnership programme.

- 2.5 Looking ahead, the service will build on this initial delivery phase through a continued programme of marketing campaigns, partner engagement and investment promotion activity. This includes further development of the Visit Kent destination management approach, ongoing campaign activity to drive visitor numbers and spend, and the continued strengthening of the Invest Kent pipeline through targeted sector engagement and promotion of investible opportunities. Alongside this, the service will continue to develop its partnership and governance arrangements, including the establishment of an oversight board and expansion of commercial partnerships, in order to enhance sustainability and impact.

3. Continuing the Service

- 3.1 The progress achieved to date is contingent on maintaining continuity of delivery, capability and market presence. The services operate in highly competitive national and international environments, where visibility, relationships and pipeline development are built incrementally over time. Any interruption to KCC and Medway Council investment at this stage would risk undermining recent progress, including the loss of momentum following the relaunch of Visit Kent and Invest Kent, disruption to campaign activity and stakeholder engagement, and a reduction in Kent and Medway's ability to compete effectively for visitors and investment.
- 3.2 Any interruption at this stage would also negatively impact business and stakeholder confidence, particularly given the recent transition from previous delivery arrangements. The service is reliant on a combination of specialist expertise, established relationships and coordinated activity across partners, all of which would be difficult to re-establish if lost. Interruption of service would diminish the effectiveness of destination marketing and inward investment promotion, weaken the pipeline of opportunities, and reduce the overall economic impact achieved through these functions.
- 3.3 Maintaining the current model therefore provides stability at a critical point in the service's (re)development, enabling Kent County Council and partners to build on early delivery, embed recent gains and continue strengthening Kent and Medway's position as a competitive location to visit, invest and do business. This is particularly important in the context of evolving national policy, Local Government Reorganisation and devolution, where maintaining a coherent, county-wide approach to economic development at a Government-defined 'functional economic authority' level remains a key consideration.

4. Options considered

Option 1: Cease provision of the service (Do nothing) – Option discounted

- 4.1 This option would result in the removal of any coordinated visitor economy or inward investment function across Kent and Medway.

- 4.2 It would lead to loss of strategic leadership, reduced ability to attract investment, loss of destination marketing capability, and a decline in competitiveness relative to other areas. It would also risk reputational damage and reduced economic activity. This option would reverse recent progress and the Key Decision made by Kent County Council and is not considered viable. ([KENT COUNTY COUNCIL](#))

Option 2: Scale back the current service – Option discounted

- 4.3 This option would retain a limited service focused on core functions but significantly reduce scope and impact. The in-house service is already operating at capacity. The in-house service is already a slimmed down version of the previous two organisations, as noted at 2.1 above.
- 4.4 This option would constrain the ability to deliver strategic priorities, weaken market presence, and reduce the effectiveness of investment attraction and destination marketing activity. It would also risk loss of momentum following the recent relaunch of the service.
- 4.5 This option would also lead to significant reputational damage with paid partners who have contributed financially to the service, with the expectation that there is a stable and suitably resourced operation to deliver the expected outputs.
- 4.6 While less disruptive than full cessation, this option would not deliver the required economic or strategic outcomes.

Option 3: Continue the current in-house delivery model – Recommended

- 4.7 This option proposes continuing the current in-house delivery model for the Visitor Economy (Visit Kent) and Inward Investment (Invest Kent) service until such time that the successor local government arrangements are implemented through Local Government Reorganisation (LGR) and devolution arrangements. The service will transfer to the successor authority/ies in accordance with statutory arrangements, thus ensuring continuity of delivery. The detailed future operating model will be determined by the successor body/ies.
- 4.8 It maintains continuity of delivery, protects recent investment in the service, and supports ongoing economic impact through inward investment and visitor activity. It also ensures stability during a period of structural change and allows time to design a long-term post-LGR successor model.
- 4.9 This option provides the best balance of impact, value for money and strategic alignment and is therefore recommended.

5. Financial Implications

- 5.1 KCC has supported Visit Kent and (formerly) Locate in Kent services for around 25 years but its contribution has reduced significantly over the years. Support

peaked some 10 years ago when KCC contributed £1.27m to these services which also received significant amounts of EU funding in addition.

- 5.2 The core, minimal viable service is currently funded through a combination of contributions from Kent County Council (£405,000 per annum) and Medway Council (£71,000 per annum). Alongside this, £140,000 of external income from industry stakeholders is supporting additional activity above the core service to enhance business support and promotional activity. This contribution also reflects industry confidence and support for the core service offer and industry would not invest without the core service being supported by KCC and Medway.
- 5.3 The continuation of the service represents a continuation of the existing funding approach. The core funding supports the minimum viable service, while stakeholder contributions enable enhanced delivery.

6. Legal implications

- 6.1 There are no direct legal implications arising from the continuation of the in-house service model.
- 6.2 Implementation of the decision, including any contractual extensions, will be undertaken in accordance with Kent County Council's standard operational requirements and processes.

7. Equalities implications

- 7.1 The continuation of the service is expected to have a positive impact on equalities by supporting job creation, promoting inclusive economic growth and increasing access to employment and business opportunities across Kent and Medway for all groups of people.
- 7.2 An Equality Impact Assessment has been undertaken, and no adverse impacts have been identified.

8. Data Protection Implications

- 8.1 The service requires the collection and management of data relating to businesses, stakeholders, partners and consumers (visitors and residents).
- 8.2 All activity will be undertaken in compliance with UK GDPR and the Data Protection Act 2018. Appropriate data governance, security measures and protocols are in place.
- 8.3 No significant data protection risks have been identified.

9. Other corporate implications

- 9.1 The proposal supports a range of corporate priorities, including economic growth, job creation, place shaping and community development.
- 9.2 It aligns with the Council's Strategic Statement by supporting residents, strengthening the local economy, and promoting efficient and effective service

delivery. The proposal supports the Kent and Medway Economic Framework, which the County Council has adopted, which sets out ambitions to promote a more productive, sustainable and inclusive economy, including attracting investment and strengthening place-based growth.

- 9.3 The service also supports partnership working across local authorities and with the private sector, reinforcing a coordinated approach to growth.

10. Governance

- 10.1 The decision will be taken by the Cabinet Member for Economic Development and Special Projects, following consideration of the proposal by the Growth, Environment & Transport Cabinet Committee, which will be asked to endorse or make recommendations on the proposed decision. A separate process will take place within Medway Council in relation to its financial contribution
- 10.2 The Director of Growth & Communities will be responsible for implementing the decision and overseeing delivery of the service.
- 10.3 The service will continue to be supported by partnership governance arrangements, including strategic oversight from industry representatives and stakeholders.

11. Conclusions

- 11.1 The in-house Grow in Kent service was established to ensure continuity of critical economic functions following the cessation of previous independent delivery arrangements. The current model has successfully stabilised and re-established visitor economy and inward investment activity for Kent and Medway, in a matter of months, which is credit to the team and the many Kent and Medway stakeholders who have engaged with the team's successful (re)establishment.
- 11.2 Enabling the service to continue beyond 31 March 2027 will build on progress to date, maintain delivery capacity, and support Kent and Medway's competitiveness regionally, nationally and internationally.
- 11.3 The proposed approach provides stability, supports economic growth, and enables a planned transition to future governance arrangements.

12. Recommendation(s):

The Growth, Environment & Transport Cabinet Committee is asked to endorse the decision to make permanent the operating model for the recently established in-house Visitor Economy (Visit Kent) and Inward Investment (Invest Kent) Service for Kent & Medway as shown at Appendix A.

13. Appendices

Appendix A – Proposed Record of Decision

Appendix B - Equality Impact Assessment

14. Contact details

Report Author: Alex Riley	Director: Stephanie Holt-Castle
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KENT COUNTY COUNCIL – PROPOSED RECORD OF DECISION

DECISION TO BE TAKEN BY:

David Wimble

Cabinet Member for Economic Development and
Special Projects

DECISION NUMBER:

26/00033

Executive Decision – key**26/00033 – Grow in Kent – Extension of Service**

Decision:

As Cabinet Member for Economic Development and Special Projects, I agree to continue the in-house Visitor Economy and Inward Investment Service for Kent and Medway, specifically:

- a) APPROVE the continuation of the existing in-house provision model for the delivery of Visitor Economy and Inward Investment services, delivered through the Grow in Kent team, beyond 31 March 2027.
- b) APPROVE the use of approved Kent County Council budgets and any relevant external funding or income to support the continued delivery of the in-house service.
- c) DELEGATE authority to the Corporate Director of Growth, Environment and Transport, in consultation with the S151 officer, to agree, finalise and manage all funding arrangements associated with the continued delivery of the service.
- d) DELEGATE authority to the Corporate Director of Growth, Environment and Transport to take all necessary actions, including (but not limited to), negotiating, finalising terms and entering into contracts or other legal agreements, and amending or terminating those agreements as required to implement the decision and maintain the continued delivery of the service.

This delegation ensures continuity of delivery pending the outcome and implementation of Local Government Reorganisation and devolution arrangements, recognising that no final service model or governance structure has yet been determined for successor authorities.

Reasons for decision:

The decision is required to provide continuity of the Grow in Kent service beyond 31 March 2027, avoiding disruption to visitor economy and inward investment activity while Local Government Reorganisation and devolution arrangements are developed. It will protect recent progress, maintain specialist capacity and

stakeholder confidence, and ensure Kent and Medway continue to have a coordinated service to support economic growth, place promotion and investment attraction.

Financial implications:

The core, minimal viable service is currently funded through a combination of contributions from

- Kent County Council (£405,000 per annum)
- Medway Council (£71,000 per annum).

Alongside this, £140,000 of external income from industry stakeholders is supporting additional activity above the core service to enhance business support and promotional activity.

Equalities implications:

An Equality Impact Assessment has been undertaken, and no adverse impacts have been identified

The continuation of the service is expected to have a positive impact on equalities by supporting job creation, promoting inclusive economic growth and increasing access to employment and business opportunities across Kent and Medway for all groups of people.

Data Protection implications:

The service requires the collection and management of data relating to businesses, stakeholders, partners and consumers, including visitors and residents. All activity will be undertaken in compliance with UK GDPR and the Data Protection Act 2018, with appropriate data governance, security measures and protocols in place. No significant data protection risks have been identified.

Cabinet Committee recommendations and other consultation:

The proposed decision will be considered at the Growth, Environment and Transport Cabinet Committee on 7th July 2026.

Any alternatives considered and rejected:

Cease provision of the service. This option was rejected as stopping the service would remove coordinated visitor economy and inward investment support, reducing strategic leadership, investment attraction, competitiveness and economic activity.

Scale back the current service. This option was rejected because the service is already operating at capacity and further reductions would limit its impact, weaken strategic delivery and market presence, risk partner confidence, and fail to achieve the required economic outcomes.

Any interest declared when the decision was taken and any dispensation granted by the Proper Officer:

.....

Signed

.....

Date

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EQIA Submission – ID Number

Section A

EQIA Title

Grow in Kent Service Extension

Responsible Officer

Natasha White - GT GC

Approved by (Note: approval of this EqlA must be completed within the EqlA App)

Steve Samson - GT GC

Type of Activity

Service Change

No

Service Redesign

No

Project/Programme

No

Commissioning/Procurement

No

Strategy/Policy

No

Details of other Service Activity

Service Extension

Accountability and Responsibility

Directorate

Growth Environment and Transport

Responsible Service

Economy

Responsible Head of Service

Steve Samson - GT GC

Responsible Director

Stephanie Holt-Castle - GT GC

Aims and Objectives

The aim of this EqlA is to review the equalities implications of continuing the Kent and Medway's in-house Visitor Economy (Visit Kent) and Inward Investment (Invest Kent) service which is now delivered by the Grow in Kent team following the closure of two external organisations, Visit Kent and Locate in Kent. The service provides a key economic development function which includes destination management, place promotion and inward investment activity.

The Equality Impact Assessment assesses whether the continuation of the service has any differential impacts on people with protected characteristics and to ensure that equality considerations are embedded in ongoing delivery.

The analysis indicates that the proposal is expected to have a positive impact on equality outcomes, primarily through supporting inclusive economic growth, increasing access to employment opportunities, and encouraging wider participation in business and sector development across Kent and Medway.

Section B – Evidence

Do you have data related to the protected groups of the people impacted by this activity?

No
It is possible to get the data in a timely and cost effective way?
No
Is there national evidence/data that you can use?
Yes
Have you consulted with stakeholders?
Yes
Who have you involved, consulted and engaged with?
- Visitor economy businesses across Kent and Medway - Inward investment and business stakeholders - Industry partners and sector representatives - Local authority partners across Kent districts and Medway - Internal Kent County Council officers involved in economic development and service delivery
Has there been a previous Equality Analysis (EQIA) in the last 3 years?
Yes
Do you have evidence that can help you understand the potential impact of your activity?
Yes
Section C – Impact
Who may be impacted by the activity?
Service Users/clients Service users/clients
Staff No
Residents/Communities/Citizens Residents/communities/citizens
Are there any positive impacts for all or any of the protected groups as a result of the activity that you are doing?
Yes
Details of Positive Impacts
Age The service supports job creation and business growth across a range of sectors, including entry-level and career progression opportunities, benefiting both younger and older people. Visitor economy activity also supports local amenities and services used by a wide age range. Disability The service supports inclusive economic growth by encouraging accessible tourism and inclusive business practices. This can improve access to employment opportunities for disabled people and promote more accessible visitor experiences across Kent and Medway. This includes promoting accessible information, digital content and inclusive communications, to ensure that a wide range of audiences can engage with and benefit from the visitor offer. Sex (Gender) The service supports employment and enterprise opportunities across sectors where both men and women are represented, including tourism, hospitality and professional services. It contributes to broader economic participation and financial independence. Race By supporting business growth and inward investment, the service contributes to creating opportunities for people from diverse ethnic backgrounds, including access to jobs and business development opportunities across the county.

Religion or Belief

The service promotes a diverse visitor offer and supports businesses operating across different communities, which can reflect and accommodate a range of cultural and religious needs.

Sexual Orientation

The service contributes to a more inclusive economy and visitor offer, supporting places and businesses that are welcoming to all individuals regardless of sexual orientation.

Gender Reassignment

No specific impacts identified, however the service supports an inclusive economic environment which is expected to benefit all individuals regardless of gender identity.

Pregnancy and Maternity

The service supports employment opportunities, including in flexible sectors such as tourism and hospitality, which may benefit those balancing work and caring responsibilities.

Marriage and Civil Partnership

No specific differential impacts identified. The service supports general economic growth and employment opportunities for all.

Negative impacts and Mitigating Actions

19. Negative Impacts and Mitigating actions for Age

Are there negative impacts for age?

No

Details of negative impacts for Age

Not Applicable

Mitigating Actions for Age

Not Applicable

Responsible Officer for Mitigating Actions – Age

Not Applicable

20. Negative impacts and Mitigating actions for Disability

Are there negative impacts for Disability?

No

Details of Negative Impacts for Disability

Not Applicable

Mitigating actions for Disability

Not Applicable

Responsible Officer for Disability

Not Applicable

21. Negative Impacts and Mitigating actions for Sex

Are there negative impacts for Sex

No

Details of negative impacts for Sex

Not Applicable

Mitigating actions for Sex

Not Applicable

Responsible Officer for Sex

Not Applicable

22. Negative Impacts and Mitigating actions for Gender identity/transgender

Are there negative impacts for Gender identity/transgender

No
Negative impacts for Gender identity/transgender
Not Applicable
Mitigating actions for Gender identity/transgender
Not Applicable
Responsible Officer for mitigating actions for Gender identity/transgender
Not Applicable
23. Negative impacts and Mitigating actions for Race
Are there negative impacts for Race
No
Negative impacts for Race
Not Applicable
Mitigating actions for Race
Not Applicable
Responsible Officer for mitigating actions for Race
Not Applicable
24. Negative impacts and Mitigating actions for Religion and belief
Are there negative impacts for Religion and belief
No
Negative impacts for Religion and belief
Not Applicable
Mitigating actions for Religion and belief
Not Applicable
Responsible Officer for mitigating actions for Religion and Belief
Not Applicable
25. Negative impacts and Mitigating actions for Sexual Orientation
Are there negative impacts for Sexual Orientation
No
Negative impacts for Sexual Orientation
Not Applicable
Mitigating actions for Sexual Orientation
Not Applicable
Responsible Officer for mitigating actions for Sexual Orientation
Not Applicable
26. Negative impacts and Mitigating actions for Pregnancy and Maternity
Are there negative impacts for Pregnancy and Maternity
No
Negative impacts for Pregnancy and Maternity
Not Applicable
Mitigating actions for Pregnancy and Maternity
Not Applicable
Responsible Officer for mitigating actions for Pregnancy and Maternity
Not Applicable
27. Negative impacts and Mitigating actions for Marriage and Civil Partnerships
Are there negative impacts for Marriage and Civil Partnerships
No
Negative impacts for Marriage and Civil Partnerships
Not Applicable
Mitigating actions for Marriage and Civil Partnerships
Not Applicable

Responsible Officer for Marriage and Civil Partnerships
Not Applicable
28. Negative impacts and Mitigating actions for Carer's responsibilities
Are there negative impacts for Carer's responsibilities
No
Negative impacts for Carer's responsibilities
Not Applicable
Mitigating actions for Carer's responsibilities
Not Applicable
Responsible Officer for Carer's responsibilities
Not Applicable

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From: David Wimble, Cabinet Member for Economic Development and Special Projects

Simon Jones, Corporate Director of Growth, Environment and Transport

To: Growth, Environment & Transport Cabinet Committee – 7th July 2026

Subject: Updated Kent Mineral Sites Plan – Regulation 19 Pre-Submission Plan and Updated Kent Minerals & Waste Development Scheme

Key Decision: N/A

Classification: Unrestricted

Future Pathway of report: County Council (16 July 2026)

Electoral Division: Malling North East (Cllr Andrew Kennedy); Malling Central (Cllr Trudy Dean) and Maidstone Rural West (Cllr Robert Ford); Maidstone Rural East (Cllr Sarah Emberson); Malling Rural East Division (Cllr Sarah Hudson); Tunbridge Wells Rural Division (Cllr Mark Munday).

Summary:

This report provides an update on the progress of updating the Kent Mineral Sites Plan, following consultation on a draft Plan in 2023. In particular, the report recommends that the Pre-Submission Kent Mineral Sites Plan, included in Appendix A, is submitted to the Secretary of State for examination into its legality and soundness. Prior to submitting the Plan, the Council is obliged to seek representations by publishing it for a minimum of six weeks which, it is proposed, will occur during July - September 2026.

Subject to independent examination and adoption by the Council, the Plan proposed for publication and submission would replace the existing Kent Mineral Sites Plan adopted in 2020. Consistent with the draft Plan consulted on in 2023, it does not propose any new or amended allocations for soft sand or sharp sand & gravel supply, but it does propose a single new allocation of land south and west of Hermitage Quarry for the extraction of hard rock from the Limestone Hythe Formation (Kentish Ragstone). Comments on the earlier draft Plan, a further Call for Sites, and detailed technical assessment of the suitability of the site for quarrying development have been considered in the Pre-Submission Draft Plan now proposed for publication. In particular the development management criteria for the proposed hard rock allocation have been strengthened by officers to take account of

comments raised by consultees and community concerns and the technical assessment. It is noted that the soft sand allocation at Chapel Farm, Lenham is currently the subject of a planning application.

National planning reforms (brought into force in March 2026 by the Levelling-up and Regeneration Act 2023 (Commencement No. 11 and Saving and Transitional Provisions) Regulations 2026) require all authorities to update older plans under a new system, however transitional arrangements allow the Plan before Committee to proceed under the previous system set out by the Town & Country Planning (Local Planning) Regulations 2012, subject to the Plan being submitted for examination by 31 December 2026. Progress of the Plan to submission by 31 December 2026 is therefore necessary if the Council is to proceed under the transitional arrangements provided by Government. There is Government expectation that planning authorities will have up to date plans in place to provide certainty for the industry and local community on planning matters. The Local Plan has been prepared in accordance with the current plan making legislation and is ready to progress under the legacy system. Progression via the new plan making system would result in the re-commencement of the plan making process and a significant delay in adoption and providing the certainty needed on mineral supply in Kent, potentially beyond 2030.

Allocation of sites in a local plan is not the same as grant of planning permission though it does provide a presumption in favour of development. Before developing an allocated site, separate planning permission would be required, and a related planning application would be determined by the Council.

Approval of an updated Kent Minerals and Waste Development Scheme (MWDS), included in Appendix B, reflecting the current timetable for updating the Kent Mineral Sites Plan is also recommended. This proposes publication of the Pre-Submission Plan in July 2026, submission to the Secretary of State for examination by 31 December 2026, examination in Spring/Summer 2027, and adoption in early 2028.

The Cabinet Committee's comments on this report, together with any formal recommendations it may wish to make, will be reported to County Council when County Council is asked to consider whether to approve publication and submission of the Pre-Submission Draft Kent Mineral Sites Plan.

Recommendation(s):

The Cabinet Committee is asked to:

1.
 - (i) Note the progress with updating the Kent Mineral Sites Plan and the role of County Council in approving and publishing for representations on soundness and legal compliance and for submission to Government for independent examination;
 - (ii) Make comment for the consideration of the Cabinet Member prior to reporting of the Pre-Submission Draft of the Kent Mineral Sites Plan 2026 (Appendix A) to County Council; and

2. Note a revised timetable for preparation of the Kent Mineral Sites Plan 2026 to be published in an updated Minerals and Waste Local Development Scheme (Appendix B);

1. Introduction

- 1.1 In Kent different minerals are supplied from a number of sources. Building sand (soft sand) is extracted from quarries; concreting sand (sharp sand & gravel) is extracted from quarries but mainly supplied via wharves from marine sources; and, premium quality hard rock (also used in concrete) is supplied from quarries in the form of Ragstone and is also imported. Ragstone is also used for heritage purposes and is sourced uniquely from quarries in Kent. Importantly for planning purposes, minerals are a finite resource and unlike other development can only be worked where they are found.
- 1.2 As the minerals and waste planning authority for Kent, Kent County Council has a statutory responsibility to prepare planning policy and determine planning applications relating to proposals for minerals supply. Planning policy that determines the suitability of proposals is included in the Kent Minerals and Waste Local Plan 2024-39 and the Kent Mineral Sites Plan.
- 1.3 The Kent Minerals and Waste Local Plan 2024-39 and the Kent Mineral Sites Plan need to be consistent with the National Planning Policy Framework (NPPF) that guides sustainable development more generally.
- 1.4 Specific policy concerning minerals development is included as chapter 17 in the NPPF. Amongst other things, this policy notes that:

‘It is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs’ and local plan policies ‘should provide for the extraction of mineral resources of local and national importance’. The policy also notes that ‘When determining planning applications, great weight should be given to the benefits of mineral extraction, including to the economy’.
- 1.5 There are a number of other policy considerations in the NPPF that are relevant to the local plan work, including those chapters that relate to conserving and enhancing the natural and historic environments, achieving sustainable development, climate change and sustainable transport. The NPPF policies need to be interpreted as a whole.
- 1.6 Allocations of land in the Kent Mineral Sites Plan provide greater certainty for the minerals industry, local communities, landowners and other stakeholders about how identified mineral supply requirements are to be met and where

mineral development is considered acceptable in principle, while still making clear that any allocated site remains subject to detailed development management criteria and the need for separate planning permission.

- 1.7 Policy CSM 2 of the Kent Minerals and Waste Local Plan 2024-39 sets out the matters to be considered when deciding to allocate land for mineral development as follows:
- the requirement for the mineral.
 - policies in the Plan which seek to protect the environment and communities (Development Management Policies);
 - relevant policies in other local plans and neighbourhood plans;
 - strategic environmental information, including landscape assessment and Habitat Regulations Assessment (HRA) as appropriate;
 - the deliverability of development in that location; and,
 - other relevant national planning policy and guidance.
- 1.8 Preparation of Local Plans is governed by legislation and policy, and the Government has recently introduced a new system of plan making which means Local Plans can still be prepared under the current system but only if they are submitted to the Planning Inspectorate for examination into their legal compliance and soundness before 31 December 2026. Any Plan submitted under the new plan making regime is unlikely to be adopted before 2030.

2. Key Considerations

- 2.1 The key policy choices are, firstly whether the County Council should now proceed to publication of a Pre-Submission Kent Mineral Sites Plan (in accordance with Regulation 19 The Town and Country Planning (Local Planning) (England) Regulations 2012) which would replace the existing 2020 Mineral Sites Plan and propose allocation of land south and west of Hermitage Quarry for hard rock extraction whilst retaining the existing site allocations for soft sand and sharp sand & gravel, and secondly, whether the Kent Minerals and Waste Development Scheme should be updated to reflect the revised Programme for publication, submission, examination and adoption of the Sites Plan.
- 2.2 The updated Kent Mineral Sites Plan is being prepared to address an identified need for additional hard rock provision confirmed in the Kent Minerals and Waste Local Plan 2024-39 that was adopted in March 2025. Consistent with the draft Kent Mineral Sites Plan published for consultation in 2023, the Pre-Submission draft Plan does not propose any change to the existing allocations for soft sand at Chapel Farm, Lenham and sharp sand & gravel at Stonecastle Farm, Hadlow and Moat Farm, Capel, as requirements for those minerals can be met from existing reserves and development of those allocated sites.
- 2.3 The site proposed for allocation for hard rock is the only hard rock site to have been nominated following two 'Call for Sites' exercises. The site is contiguous with the existing Hermitage Quarry and would contribute to maintaining a steady and adequate supply of land won crushed hard rock aggregate and also maintaining a supply of dimension stone, used as an important building stone,

particularly for heritage purposes. The proposed site lies within the administrative areas of Tonbridge and Malling and Maidstone Boroughs and falls within the parishes of Barming, East Malling and Larkfield and Ditton. The existing processing plant is within Aylesford Parish.

- 2.4 Consultation responses in respect of the hard rock site raised concerns about HGV traffic and road safety, ancient woodland and biodiversity loss, landscape effects, archaeology and heritage, groundwater, geology, amenity, public rights of way and carbon impacts. Representations in support of the allocation drew attention to the economic and training benefits, the sustainability of sourcing material locally and the increased carbon impact of importation, the company's track record in site restoration and the role it plays as the only option in providing heritage stone to preserve some of England's most historic buildings, including the Tower of London and Canterbury Cathedral.
- 2.5 Detailed technical assessment of the suitability of the new hard rock allocation has considered transport, ancient woodland and biodiversity loss, landscape, historic environment, groundwater, geology, amenity, health, air quality, public rights of way and carbon impacts. Constraints, particularly the presence of ancient woodland in the form of 'Plantation on Ancient Woodland Sites', were considered in more detail. The detailed technical assessment has informed revisions to the proposed site allocation and strengthened development management criteria which also took account of comments received at the earlier Regulation 18 consultation stage on the initial Draft Plan.
- 2.6 Allocation of a site in a mineral sites plan is not the same as the granting of planning permission. Allocation would establish that the County Council considers the site acceptable in principle. Any future quarry extension would still require a separate planning application and determination by the County Council as Mineral and Waste Planning Authority which would involve further environmental assessment and identification of necessary detailed mitigation and compensation of potential impacts.
- 2.7 It should be noted that existing operations at Hermitage Quarry occur in accordance with a conditional planning permission that satisfactorily mitigates amenity and environmental impacts. It is intended that similar controls would be in place for any future quarrying development.
- 2.8 Any comments made by the Cabinet Committee on the matters set out in this report, together with any formal recommendations of the Committee, will be recorded and reported to County Council for consideration alongside a report that seeks approval to publish the Pre-Submission Draft Kent Mineral Sites Plan and to proceed with the related next steps in the plan making process. Decisions on Local Plan considerations are a matter for County Council.

3. Background

Kent Mineral Sites Plan

- 3.1 The Kent Minerals and Waste Local Plan was originally adopted in 2016, was subject to Early Partial Review in 2020, and sat alongside the Kent Mineral Sites Plan adopted in September 2020. The adopted Mineral Sites Plan allocates sites for soft sand and sharp sand & gravel, but it did not identify a separate hard rock allocation, on the basis that there was no need for additional reserves to be identified at that time.
- 3.2 A review of the Kent Minerals and Waste Local Plan in 2021 concluded that updates were needed, including extension of the plan period and updated aggregate provision requirements. As part of that work, the need to identify additional hard rock reserves was recognised, and work commenced on updating the Kent Mineral Sites Plan so that, if possible, land could be identified for hard rock extraction. The Kent Minerals and Waste Local Plan 2024-39 was adopted in March 2025 and confirmed a hard rock shortfall of about 17.4 million tonnes over the Plan period. Subsequent monitoring (reported in the Local Aggregates Assessment) has identified a current need of some 19.9 million tonnes.
- 3.3 Work on the Mineral Sites Plan was paused in 2023 whilst the County Council progressed the Kent Minerals and Waste Local Plan 2024-39 through examination and adoption.
- 3.4 As part of the work of updating the Mineral Sites Plan, two 'Call for Sites' exercises were undertaken. This resulted in the nomination of land south and west of the existing Hermitage Quarry near Maidstone by the operator of the existing quarry. The promoted site covers about 96 hectares, with the promoter indicating that extraction subject to stand-offs and other planning constraints would meet the shortfall identified in the Kent Minerals and Waste Local Plan 2024-39 of 17.4 million tonnes. Part of the site is designated for planning purposes as ancient woodland. In this case, the relevant ancient woodland interest lies in the presence of ancient woodland soils and ground flora and fungi rather than surviving ancient woodland tree cover, as the existing tree cover is largely plantation sweet chestnut (formally known as 'Plantation on Ancient Woodland Sites' (PAWS)). Ancient Woodland is defined by Natural England as an area of land that has been wooded continuously since at least 1600 AD. It includes plantations on ancient woodland sites, replanted with conifer or broadleaved trees, that retain ancient woodland features, such as undisturbed soil, ground flora and fungi.
- 3.5 The allocated site extends to some 96ha. An area of some 49 hectares would be extracted and 84% (41 hectares) of the area to be worked is identified as PAWS and is actively managed as a sweet chestnut plantation. The remaining c.47 ha would provide for standoffs and compensatory habitat. The PAWS within this area, would remain undisturbed. Once restored, the extracted 49ha area would also contribute to compensatory habitat.

- 3.6 In 2023, the County Council published a draft Kent Mineral Sites Plan in accordance with Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012. This draft Plan also confirmed that, although the need for soft sand and sharp sand & gravel had been re-assessed for the extended plan period, this had not identified a need for further allocations for these aggregate minerals and so the existing adopted allocations would remain unchanged. This is still the case.

Consultation

- 3.7 Public consultation on the draft Plan was dominated by concerns about the nominated hard rock site. Some 326 objections were received from local residents and a further 25,473 objections resulted from a national Woodland Trust campaign. In addition, a petition addressed to a former Cabinet Member from Cllr Stuart Jeffrey (Leader of Maidstone Borough Council and local KCC Member for Maidstone Central) was signed by 403 names objecting to the loss of ancient woodland and farmland and suggesting that there are other sources of material for heritage purposes. 396 representations in support of the hard rock site were received.
- 3.8 In March 2026, a representation from Friends of Oaken Wood and 84 identical letters from residents objecting to the proposal were submitted to the Cabinet Member. Comments were also received from statutory consultees and other stakeholders. A Consultation Statement that details the consultation process, the text of the petition and a summary of the matters raised is provided in Appendix C.
- 3.9 Five comments were made regarding the three 2020 adopted site allocations at Stonecastle Farm, Moat Farm and Chapel Farm.
- 3.10 The main issues raised in respect of the Stonecastle Farm and Moat Farm allocated sites, related to disruption to local communities and the need for appropriate mitigation, including provision for recreational use.
- 3.11 In respect of the Chapel Farm, Lenham site, a mineral operator questioned the accuracy of the data supplied by mineral operators in the annual monitoring returns suggesting that the soft sand landbank position and reserves are under recorded. The comment also cast doubt on whether the Chapel Farm allocation site would come forward within the plan period, supporting the need for alternative sites to come forward. The South Downs National Park Authority advised that soft sand is constrained within the National Park and there is a need for Kent to use its Local Aggregate Assessment data to monitor its ability to maintain a steady and adequate supply to meet its requirements and wider regional needs.
- 3.12 The concerns raised about the land to the south and west of Hermitage Quarry mainly covered the following matters:
- Highways and Transport: Concerns about increased heavy goods vehicle traffic on local roads, potential impacts on the strategic network (Maidstone area), and road safety; any proposal should include a full Transport Assessment and HGV routing plan.

- Ancient Woodland and Biodiversity: The site incorporates valuable habitats and includes an area designated as ancient woodland (PAWS), which under national policy is considered irreplaceable and requires wholly exceptional reasons to be demonstrated and a suitable compensation strategy to be provided if the development is to progress; the loss of ancient woodland would be greater than that caused by HS2 and Lower Thames Crossing developments combined; there would be harm to protected species and biodiversity and any biodiversity loss should be suitably compensated for.
- Landscape: There would be loss of woodland character, loss of agricultural land and harm to the surrounding landscape, including possible impact on the setting of the Kent Downs National Landscape and cumulative effects with the existing quarry; any proposal should require detailed landscape and visual assessment together with substantial screening, buffering and restoration measures.
- Noise, Dust and Amenity: There would be noise, dust, blast vibrations, and lighting impacts from quarrying, which could impact health and amenity; there should be strict mitigation of impacts including significant buffers.
- Footpaths and Bridleways: The nominated area includes footpaths and bridleways and these should be protected or diverted with replacement routes to maintain public access.
- Climate Change and Carbon: Development in this location would conflict with net zero goals due to the loss of a significant carbon store (in the form of trees) and carbon emission impacts and would conflict with KCC's climate and Net Zero commitments and impact upon future scientific research.
- Heritage and Archaeology: There is potential for archaeological assets to be present at the site and impacts on the historic setting of nearby designated heritage assets; depletion of dimension stone resources for heritage restoration is threatened by aggregate working; detailed archaeological investigation is needed.
- Groundwater: There may be effects on groundwater quality and levels.
- Geology: Impacts on the nearby Oaken Wood Geological SSSI should be avoided.
- Alternative Sources: Other sources of aggregate are available and should be fully explored.

3.13 The Woodland Trust led a national campaign which generated 25,473 letters mainly concerned with impacts on Oaken Wood, including its designation as ancient woodland, habitat for important species of flora and fauna and function as a carbon store. It considers that compensatory planting or restoration would not mitigate or compensate the loss of ancient woodland.

3.14 Many representations considered that a more suitable alternative site could be found and so a second Call for Sites was undertaken from August to October 2023, but this did not identify any alternative hard rock sites.

3.15 In summary, representations supporting allocation of land south and west of Hermitage Quarry emphasised:

- The role of the site in helping to maintain a steady and adequate supply of hard rock in Kent, including Kentish Ragstone for heritage building and repair;
- The practical advantages of extending an existing quarry with established plant and infrastructure;
- The potential benefits of sourcing material locally rather than relying more heavily on imports;
- The economic value of the quarrying operation in terms of employment, skills development and associated supply chain activity;
- The operator's track record in site management and restoration; and,
- The contribution the quarry makes to the local construction sector, including aggregate supply and the management of construction and demolition waste.

3.16 Following the consultation, the Council undertook and commissioned more detailed assessment work concerning the nominated extension to Hermitage Quarry covering, amongst other things, ecology, landscape, health, air quality, carbon, alternative supplies and socio-economic effects. The assessments were used to help determine whether the site was suitable for allocation in accordance with adopted policy CSM 2 in the Kent Minerals and Waste Local Plan that guides decisions on allocating sites.

3.17 The key findings from the detailed assessment include:

- **Mineral Resource and Need:** Kentish Ragstone is the only hard rock mineral deposit worked in Kent and one of the few worked in the South East. Current Kentish Ragstone hard rock reserves in Kent will be exhausted by around 2033 (at current extraction rates). The nominated site contains significant Kentish Ragstone reserves which are needed to maintain a steady and adequate supply of crushed hard rock aggregate for construction. As well as being used for aggregate, Kentish Ragstone is an important building dimension stone needed for the conservation of many Grade 1 listed buildings including the Tower of London, Rochester and Leeds Castles and Canterbury Cathedral. It is important to note that only a relatively small proportion of the material within a worked Ragstone sequence is suitable for use as a building dimension stone. In practice, a quarry worked solely to obtain a reliable supply of suitable building stone would still need to work a substantial area in order to yield a viable quantity of suitable quality stone for this specific purpose. This is because there is significant wastage arising from the narrow thickness of the Kentish Ragstone beds and the presence of hassock material between them, much of which cannot be used as building stone.
- **Alternatives:** Assessment of alternative supply options indicates that the site would provide a practical, deliverable indigenous source of hard rock aggregate because it is contiguous with an existing quarry and associated plant and infrastructure. There are other potential sources of aggregate and the capacity of Kent's wharf and rail infrastructure would support additional imports. However, there is no absolute certainty that sources elsewhere could continue to meet local requirements and there is no clear suitable alternative source of the Kentish Ragstone which is used as a building stone

for heritage purposes. This was accepted by the Planning Inspectorate and Secretary of State in granting planning permission for the existing workings at Hermitage Quarry. Ultimately mineral resources can only be worked where they are found and, accordingly, any future supply of Kentish Ragstone must be considered in the context of the locations where that geological resource actually exists.

- **Site Characteristics:** The land is currently used as farmland and woodland; it is contiguous with the existing Hermitage Quarry, the latest planning permission for which was issued in 2013. While quarrying would logically expand into the nominated area to allow ongoing access to the Ragstone resource, most of the proposed area is designated Ancient Woodland (PAWS) with an area of high quality farmland, which national and local policies seek to protect.
- **Constraints and Mitigation:** The assessment identifies that quarrying development in this area would need to address constraints. In particular, loss of ancient woodland and any affected ancient or veteran trees would normally be unacceptable unless 'wholly exceptional reasons' exist. As Ancient Woodlands cannot be recreated, a suitable compensation strategy is also required. It is noted that the ecological survey work undertaken for Gallaghers concluded that no Ancient or Veteran tree specimens exist within the proposed extraction area.
- **Other key constraints:** include a local wildlife site, protected trees covered by a woodland Tree Preservation Order, a public right of way, nearby dwellings and the ability of local roads to accommodate quarry traffic. The assessment (see Appendix F) notes that with appropriate mitigation (including woodland replanting, enhanced buffers, ecological enhancements, biodiversity net gain, public rights of way diversions and HGV and blasting controls), the site could be developed without unacceptable adverse impacts.
- **Socio-economic impacts:** Socio-economic assessment indicates that continuation of extraction at Hermitage Quarry would support direct employment, local productivity and supply chain activity and would help retain a source of Kentish Ragstone. However, if future hard rock requirements were met through increased importation or other alternative supply, the wider adverse impact on Kent's construction sector is likely to be modest, although more localised direct and indirect socio-economic effects would still arise.
- **Consistency with other Local Plans:** The proposed allocation has been assessed against the relevant adopted Tonbridge and Malling Borough Council and Maidstone Borough Council Local Plan policies. That assessment indicates that, subject to mitigation and controls that would be addressed through any subsequent planning application, overall, allocation of the site is consistent in principle with those plans, particularly in relation to sustainable development, support for the local economy, the need for development requiring a rural location, and transport and infrastructure matters. Environmental policies of the Local Plans, including those relating to landscape, public rights of way and the natural environment, have been considered through the detailed assessment work as discussed above.

- 3.18 Legislation requires an independent Sustainability Appraisal of draft planning policy to be carried out in order to identify and assess the likely social, economic and environmental effects of the Plan and to recommend any changes considered necessary. A draft Sustainability Appraisal was published alongside the Regulation 18 Plan for consultation. An updated Sustainability Appraisal has been completed to accompany the Pre-Submission Draft Kent Mineral Sites Plan and is included as Appendix D. A Non-Technical Summary of the Sustainability Appraisal is also provided as Appendix E. Recommendations of the Sustainability Appraisal concerned the need for changes to the development management criteria related to the Hermitage Quarry allocation, and these have been incorporated as appropriate.
- 3.19 To determine whether the site is suitable for development ‘in principle’ (and so can be allocated) the matters identified in policy CSM 2 (as set out in the Introduction) have been assessed. The details of this assessment are set out in a separate report (Appendix F). Notwithstanding the strong objections to the loss of ancient woodland, planning policy is clear that, where there are ‘wholly exceptional reasons’ and a suitable compensation strategy, loss of ancient woodland is acceptable in planning terms. At the examination, the Planning Inspector appointed by the Secretary of State will, weigh the competing planning policy interests in light of the detailed evidence and determine which takes precedence. That is a key part of the Local Plan examination.
- 3.20 The report’s conclusion is that there is no overriding reason to exclude the land south and west of Hermitage Quarry from allocation. The report confirms the site’s socio-economic benefits and geological suitability for working, subject to detailed safeguards set out as strengthened development management criteria in the Pre-submission Draft Kent Mineral Sites Plan.
- 3.21 Those criteria have been considerably strengthened by officers in response to comments received at Regulation 18 stage and the findings of the detailed assessment work, including by drawing clearer attention to transport, biodiversity, ancient woodland (PAWS), amenity and restoration requirements. Details of the criteria are set out in Appendix 1 of the Draft Mineral Sites Plan (Appendix A).
- 3.22 It is important to note that the proposed allocation engages particularly strong policy protection because the site includes a significant area of land (41 hectares) designated ancient woodland which is considered irreplaceable habitat. Appendix F includes detail on how it is considered that the ancient woodland policy tests, including the ‘wholly exceptional reasons’ and suitable compensation strategy requirements, could be met at the planning application stage. This Appendix has had regard to the evidence on the nature of the designation, the assessment of effects on the PAWS and associated habitat interest, the need for the mineral, the socio-economic impact, the importance of the material for heritage purposes and a suitable compensation strategy capable of being secured.

3.23 The wholly exceptional reasons in this case, can be summarised as:

- a. Significant need for crushed rock recognised in the adopted KMWLP to meet national and local policy requirements to maintain a steady and adequate supply of aggregate;
- b. Unique and nationally important supply of dimension stone for the repair and conservation of nationally significant heritage assets such as Tower of London, Leeds Castle and Canterbury Cathedral;
- c. No reasonable alternative site of indigenous (land won) material within Kent;
- d. The sustainability benefits of a local source of supply compared with increased reliance on imports - local extraction avoids long distance transport impacts, including increased carbon emissions and a reliance upon external supply; Local extraction results in reduced economic and environmental costs;
- e. Significant socio-economic benefits – The Gallagher Group has an annual turnover into the Kent economy of £200m. The quarry supports 140 direct jobs, with support for further indirect jobs in the 400 companies in the current supply chain. It provides skills training and apprenticeships, including a skills hub for the nationally important Lower Thames Crossing and community and social value contributions of circa £53m (for 2024/25), including sponsorship of Maidstone United, Heart of Kent Hospice and Demelza House;
- f. Resilience and industry stability benefits from long term continuity of supply;
- g. The practical deliverability advantages of extending an existing quarry with established infrastructure, and effective controls in place to mitigate environmental impacts;
- h. Continued operation of the site would maintain its contribution to waste management and recycling in Kent, including processing Construction, Demolition and Excavation (CD&E) waste into recycled aggregate and using Air Pollution Control residues (APCr) from Energy from Waste (EfW) plants with quarry fines to produce an EA-certified non-waste lightweight aggregate.
- i. Conversely, loss of recycled aggregate production would increase demand for primary aggregates, and,
- j. In plan making terms, the site is deliverable.

3.24 In summary, the proposed compensation strategy would comprise:

- a. Translocation of soils from the PAWS to facilitate mineral working;
- b. Replacement of the non-native coppice and modified grassland to be removed for mineral working, to be replaced as quarrying progresses with higher quality native broadleaved woodland;
- c. Management of the translocation and quarry restoration sites;
- d. Establishment and management of new native broadleaved woodland, traditional orchard and other neutral grassland on areas of modified grassland, outside the proposed mineral working area (on land currently in the operator's (Gallagher) control).

- e. Management of retained PAWS (Oaken Wood) adjacent to the proposed mineral working area (on land currently in Gallagher's control);
- f. New native woodland planting and habitat created on land adjacent to Hermitage Quarry and/or on land elsewhere in Kent;
- g. Existing woodland to be managed and enhanced adjacent to Hermitage Quarry and/or on land elsewhere in Kent;
- h. Compensation for the loss of any veteran or ancient trees; and
- i. The prioritisation of compensation measures on land within or adjacent to the allocated site.

3.25 The proposed compensation strategy would provide gains at least equivalent to that of the 'Westerly Extension', which was previously permitted by the Secretary of State for new native woodland and managed existing woodland. In addition, the strategy proposes a qualitative gain to be achieved by replacing non-native plantation with native woodland. The total net compensation would provide a gain of +112 hectares which consists of new native woodland planting and enhanced management of existing woodland. This excludes the 42 ha of woodland to be lost to mineral working. The total woodland creation and enhancement equate to 154 ha, which would be created compared to the 42 ha woodland (41ha of PAWS) which is assumed would be lost to facilitate mineral working. This equates to a 266% increase of native mixed species woodland (by creation and enhancement). Further details of the compensation strategy would be provided as part of any planning application process, in accordance with the principles included in the updated development management criteria in the Pre-Submission Draft Sites Plan. At plan making stage, a proportionate approach is required as to the level of detail needed to satisfy NPPF policy test.

3.26 It should be noted that the boundaries of the site would be refined as part of a planning application, and it is possible that the area of PAWS within the proposed extraction area could be reduced and the compensation areas adjusted accordingly. At the planning application stage, should it be deemed necessary/beneficial to extract in areas that form part of the current woodland management plan for the Westerly Extension, additional compensation areas would need to be identified so as not to diminish the value of existing commitments.

3.27 In addition to the above, it should be noted that the Secretary of State granted permission in 2013 for the current Westerly Extension to Hermitage Quarry following a public inquiry. That decision accepted that the proposal would result in the loss of ancient woodland but concluded that the very considerable need for crushed rock aggregate and dimension stone, together with biodiversity, socio-economic and other benefits, outweighed the adverse impacts in that case.

3.28 This previous decision provides context for the current proposed allocation, particularly in recognising the strategic importance of maintaining supply from Hermitage Quarry and the specific heritage value of Kentish Ragstone.

Next steps

- 3.29 Following publication, the Pre-Submission Draft Plan, supporting evidence and duly made representations would be submitted to the Planning Inspectorate for independent examination on behalf of the Secretary of State. The Planning Inspector would consider whether the Plan has been prepared in accordance with the relevant legal requirements and whether it is sound, namely whether it is 'positively prepared', 'justified', 'effective' and 'consistent with national policy'.
- 3.30 The examination may include public hearing sessions and can result in the Inspector recommending modifications to make the Plan sound. Importantly, the Council cannot adopt the Plan unless it has received a report from the Inspector concluding that the Plan, with any modifications, is legally compliant and sound.

Kent Minerals and Waste Development Scheme

- 3.31 The Minerals and Waste Development Scheme (MWDS) is essentially KCC's project plan for preparing, including updating, minerals and waste planning policy and guidance. Publication of a scheme is a legal requirement as part of the plan making process. Preparation of an updated Kent Mineral Sites Plan has taken place in accordance with the timetable published in the Kent Minerals and Waste Development Scheme, however, the current Scheme now needs updating to reflect the proposed programme for publication, submission, examination and adoption of the Kent Mineral Sites Plan.
- 3.32 The need for a revised timetable arises because planning policy resources had been dedicated to updating the Kent Minerals and Waste Local Plan and the detailed technical assessment of the nominated land south and west of Hermitage Quarry, together with the preparation of the supporting Sustainability Appraisal and other evidence, which needed to be undertaken to a level of rigour sufficient to ensure that any proposed allocation is robust, justified and capable of being found sound at independent examination. In addition, the Plan must now be progressed to meet the Government's deadline of 31 December 2026 for submission of plans prepared under the existing plan-making system. The proposed revised Scheme therefore provides for publication of the Regulation 19 Pre-Submission Mineral Sites Plan in July 2026, submission to the Secretary of State by 31 December 2026, examination in Spring/Summer 2027 and adoption in early 2028.
- 3.33 The proposed revised Scheme is included at Appendix B and the table below sets out the related changes to the timetable for the updated Kent Mineral Sites Plan.

Kent Mineral Sites Plan – Changes to Timetable

Key Stages	Current	Proposed
Evidence gathering including detailed technical assessment	<i>July 2023 – June 2024</i>	July 2023 – May 2026
Publication of draft Mineral Sites Plan for representations on soundness (Reg 19)	<i>June – July 2025</i>	July – Sept 2026
Submission to Secretary of State for examination	<i>October 2025</i>	By 31 December 2026
Independent Examination hearings	<i>January 2026</i>	June 2027
Inspector's Report	<i>April 2026</i>	November 2027
Adoption by Council	<i>September 2026</i>	February 2028

3.34 This will be the final mineral sites plan prepared under the existing plan making system.

New Plan Making System

3.35 The UK's new local plan making regime (which came into force in March 2026) introduces a different approach and timetable. Transitional arrangements nevertheless allow the County Council to continue preparation of the Kent Mineral Sites Plan under the existing 2012 Regulations provided it is submitted by 31 December 2026.

3.36 In practical terms, KCC must maintain progress on the current Plan so that it can be submitted by the end of 2026. Were that not to occur, the Council would need to consider how an updated mineral sites plan would be taken forward under the new system that includes a formal 30 month plan preparation timetable.

4. Options considered and dismissed, and associated risk

4.1 An alternative option to proceeding with a full Mineral Sites Plan under the legacy plan making system, would have been to prepare a standalone hard rock Mineral Sites Plan whilst leaving the existing 2020 Kent Mineral Sites Plan unchanged. That option is not considered appropriate because it would result in a fragmented planning framework, require a further separate update to the Mineral Sites Plan for the remaining minerals, and would be less consistent with the scope and approach of the draft Kent Mineral Sites Plan consulted on in 2023.

4.2 A further option considered was to prepare a single mineral sites plan prepared under the new plan making system. That option is not proposed because it would delay certainty on hard rock provision until significantly later, potentially beyond 2030.

- 4.3 In terms of the content of the Mineral Sites Plan, an option would be not to allocate the land extending the current Hermitage quarry and instead rely on alternative sources of hard rock. This option is not proposed because this risks continuing uncertainty about how the identified hard rock requirement is to be met, potential increased reliance on imports and ad hoc decision-making and potential socio-economic impacts, including 140 direct job losses (according to the operator) due to the closure of Hermitage Quarry and the loss of stone for historic restoration.

5. Financial Implications

- 5.1 The costs of updating the Kent Mineral Sites Plan, including consultation, preparation of supporting documentation and the eventual independent examination, will need to be met from the Growth and Communities Division planning policy budget.
- 5.2 No direct cost saving arises from the proposed decision, however, maintaining a current minerals planning framework helps reduce the risk of appeals to planning decisions and associated public inquiry costs, which are met from Growth and Communities budget (Planning Applications). Pursuing an approach which reduced the time taken to allocate the site at Hermitage Quarry would also provide greater certainty to businesses in Kent that may facilitate investment in the local economy. A Mineral Sites Plan that addresses all mineral types as proposed also reduces the plan making costs, by only requiring a single external examination.

6. Legal implications

- 6.1 The County Council has a statutory duty, as minerals and waste planning authority, to prepare and maintain an up to date development plan for minerals and waste matters in Kent. The Kent Mineral Sites Plan forms part of that statutory development plan and is important in the determination of planning applications. Proceeding with this update would therefore contribute to the discharge of the Council's plan-making responsibilities.
- 6.2 If the Kent Mineral Sites Plan is to proceed under the existing plan making system, the statutory process in the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012 must be followed, including Regulation 19 publication for representations on soundness and legal compliance, consultation in accordance with the Statement of Community Involvement, and publication and submission in accordance with the Minerals and Waste Development Scheme. The current report also proceeds on the basis that submission must occur by 31 December 2026 if the Plan is to remain within the legacy transitional arrangements.
- 6.3 There is a legal risk if the evidence base supporting the proposed allocation is not found to be sufficiently robust, particularly given the relationship to irreplaceable habitat with the proposed allocation at Hermitage Quarry and the need for any allocation to withstand scrutiny on soundness and consistency

with national policy. There is also legal and procedural risk if timetable requirements are missed. Conversely, failure to maintain an up to date minerals planning framework can reduce local control and increase the risk of Government intervention in plan making. In light of Local Government Reorganisation, it is noted that the authority that agrees to publish the plan for examination (proposed through this paper to be Kent County Council) may not be the authority that adopts the Plan (and as yet unnamed and unknown Successor Authority).

7. Equalities implications

- 7.1 An Equality Impact Assessment (EqIA) has been prepared and is provided as Appendix G. No specific adverse equalities implications have been identified from the act of preparing and consulting on planning policy itself. The decision principally concerns plan-making, consultation and associated evidence rather than direct service changes to protected groups.
- 7.2 The EqIA records that the Council must ensure that consultation and publication arrangements are accessible and proportionate, including availability of documents in appropriate formats and through appropriate channels.
- 7.3 Site specific issues raised through the process, such as impacts on amenity, access, rights of way and local communities, have been considered as part of the evidence base and would be considered again at any future planning application stage.
- 7.4 The current assessment is therefore that no disproportionate equality impacts arise from the proposed decision itself.

8. Data Protection Implications

- 8.1 Following a scoping process, a Data Protection Impact Assessment is not required. Personal data is provided to the County Council which it has a legal duty to collect as part of its plan making responsibilities. The local plan work does not introduce any new category of personal data processing beyond the normal handling of consultation responses and representations within the statutory local plan process. Personal data will, however, be collected, stored, reviewed and, where required by the statutory process, published or shared in connection with Regulation 19 representations and the subsequent examination. The Council's privacy notice sets out how the data is used.

9. Other Corporate Implications

- 9.1 The wider corporate policy framework has been taken into account, in particular the Council's wider environmental and economic growth objectives.
- 9.2 Relevant matters in 'Reforming Kent' (Statement 2025) include support for local businesses, investment and jobs, protection of the countryside and rural communities, ensuring that infrastructure needs are met to support economic

growth and quality of life, and a focus on practical environmental improvement. The Kent Mineral Sites Plan relates to these matters by planning for a steady and adequate supply of minerals needed for construction and infrastructure, while requiring detailed environmental safeguards, mitigation and restoration in relation to site allocations. It would also support local employment and investment.

10. Governance

- 10.1 The principal formal decisions are for the Cabinet Member and, where required by the constitution, County Council. In particular, County Council approval will be required for publication of the Pre-Submission Kent Mineral Sites Plan and for its submission for independent examination. The Cabinet Committee's role is to consider and endorse in relation to the proposed decision.
- 10.2 Delegated authority to the Corporate Director for Growth, Environment and Transport, in consultation with the relevant Cabinet Member, is sought to: Approve any non-material changes to the draft updated Kent Mineral Sites Plan and supporting documents prior to publication; to manage the submission documentation; and, if the Plan proceeds to examination, to agree and publish any main modifications and any further non-material changes required through the examination process. That approach follows that taken in the preparation of current Kent minerals and waste plans and is necessary for the efficiency of the plan making process. It should be noted that any main modifications would be the subject of formal consultation.

11. Conclusions

- 11.1 The Council has a responsibility to plan for a steady and adequate supply of aggregate minerals to meet local need. National policy expects that material is sourced indigenously from land-won sources where possible. The adopted Kent Minerals and Waste Local Plan and aggregate monitoring identify requirements for the main land-won aggregate minerals in Kent: Sharp sand and gravel, soft sand and hard rock. The existing Kent Mineral Sites Plan already includes allocations for soft sand at Chapel Farm West, Lenham, and for sharp sand and gravel at Moat Farm, Capel and Stonecastle Farm Quarry, Hadlow, which remain necessary to contribute to meeting aggregate needs over the Plan period. Updated monitoring (set out in the latest Kent Local Aggregate Assessment 2025) indicates that no additional soft sand or sharp sand and gravel sites are currently required, however a further requirement for approximately 19.9 million tonnes of hard rock over the Plan period has been identified. This is proposed to be addressed in an allocation for hard rock in the updated Mineral Sites Plan.
- 11.2 The Kent Minerals and Waste Local Plan, monitoring evidence and the representations received do not support the need for changes to the soft sand and sharp sand and gravels allocations, the land interests have confirmed their intention to progress these allocations, therefore satisfying the deliverability test and therefore no changes are proposed for these minerals and so it is

proposed that the 2020 allocations are taken forward from the 2020 Mineral Sites Plan.

- 11.3 Responses to consultation on the nomination of land south and west of Hermitage Quarry for allocation in the Plan for hard rock extraction raised objections and concerns around matters such as amenity, transport, and natural environment, including the loss of land designated as ancient woodland (in this case PAWS). Detailed assessment of the issues, however, indicates that, mitigation and compensation of impacts to an acceptable level is possible and so, on balance, the allocation of the site is appropriate and is in accordance with Policy CSM2 of the Kent Minerals and Waste Local Plan 2024-39. Allocation would provide greater certainty that a sustainable local supply of Ragstone, a mineral of high local value, can be secured, providing local aggregate and a source of heritage stone for the restoration of UNESCO protected buildings in London and the South East. This is consistent with a Secretary of State's previous finding that the building stone material cannot be sourced elsewhere. Allocation would support the Kent local economy, given the Gallagher Group's importance as a significant Kent employer, directly and indirectly, with an annual turnover of £200 million, an annual social value contribution of some £53m and a key skills and training provider, including via its apprenticeship and skills hub in the county. Continued operation at the site would also include production of recycled aggregate via the processing of construction and demolition waste delivered to the site for management.
- 11.4 The allocation of the hard rock site, raises competing planning interests as set out in the Government's National Planning Policy Framework, however, the Pre-Submission Draft Mineral Sites Plan is considered sound and its submission for examination by the Planning Inspectorate would allow for detailed independent scrutiny of competing planning interests. A similar conflict arose in 2012, when the then Secretary of State considered the planning application for the current quarry site, which involved the loss of an adjacent PAWS site, and the need for the quarrying activity, and a steady and adequate supply of minerals. Conditional planning permission was granted for the quarry extension. Whilst the NPPF test in respect of ancient woodland has been strengthened since 2012, it is considered that wholly exceptional reasons and a suitable compensation strategy can be demonstrated, as required by the updated NPPF, and so a Plan that allocates this site can be submitted for independent examination.
- 11.5 An updated Kent Mineral Sites Plan would replace the current adopted 2020 Plan. Consistent with the 2023 draft Plan, it would retain the existing allocations for soft sand and sharp sand & gravel, while also formally allocating land south and west of Hermitage Quarry for hard rock extraction.
- 11.6 Planning assessment (Appendix F), informed by detailed reports, confirms that, subject to mitigation, including suitable compensation for loss of ancient woodland, the Hermitage Quarry site can be developed in accordance with policy. Publication of a Pre-submission Draft Kent Mineral Sites Plan will allow formal public representations on the draft Plan prior to examination into its legality and soundness.

- 11.7 Sustainability Appraisal of the Plan has been completed (Appendix D) and a Consultation Statement (Appendix C) has been completed that reports on earlier engagement.
- 11.8 The updated MWDS (Appendix B), sets out a revised timetable for completion of the updated Kent Mineral Sites Plan.
- 11.9 This will be the final plan completed under the old plan making system. Progressing, an update to the Kent Mineral Sites Plan now, allows the Council to update and replace the adopted 2020 Mineral Sites Plan under the existing Regulations rather than having to prepare an immediate separate replacement plan under the new system. Submission by 31 December 2026 is therefore important.
-

Recommendation(s):

The Cabinet Committee is asked to:

1.
 - (i) Note the progress with updating the Kent Mineral Sites Plan and the role of County Council in approving and publishing for representations on soundness and legal compliance and for submission to Government for independent examination;
 - (ii) Make comment for the consideration of the Cabinet Member prior to reporting the Pre-Submission Draft of the Kent Mineral Sites Plan 2026 (Appendix A) to County Council; and
2. Note a revised timetable for preparation of the Kent Mineral Sites Plan 2026 to be published in an updated Minerals and Waste Local Development Scheme (Appendix B)

12. Appendices

- Appendix A: Pre-Submission Draft Kent Mineral Sites Plan July 2026
 - Appendix B: Updated Kent Minerals and Waste Local Development Scheme, July 2026
 - Appendix C: Consultation Statement – Review of Comments Received to Regulation 18 Consultation on the Review of the Mineral Sites Plan.
 - Appendix D: Sustainability Appraisal, June 2026
 - Appendix E: Non-Technical Summary of the Sustainability Appraisal
 - Appendix F: Hermitage Quarry Suitability for Allocation Assessment Report
 - Appendix G: Equality Impact Assessment
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Background Documents

- [Kent Mineral Sites Plan 2020](#)
- [Kent Minerals and Waste Local Plan 2024-39](#)
- [Kent Minerals and Waste Development Scheme, September 2024](#)
- [Statement of Community Involvement 2021](#)
- [Kent Local Aggregate Assessment 2025 \(2015-24 data\), June 2026](#)
- [National Planning Policy Framework 2024 \(as amended February 2025\)](#)
- [GAL original response to Call for Sites with details of Land to the South and West of Hermitage Quarry](#)
- [Draft Site Identification and Selection Methodology, September 2022](#)
- [Initial \(RAG\) Assessment of the Suitability of Nominated Land to the South and West of Hermitage Quarry for Hard Rock, May 2023](#)
- [Draft Kent Mineral Sites Plan including details of the nominated hard rock site \(May 2023\)](#)
- [GAL Case for Continuation, June 2026](#), and its appendices:
 - A [Gallagher Presentation - Introduction and Overview. Gallagher Aggregates Limited, June 2026](#)
 - A1 [Letter from Hearnshaw Planning on behalf of Gallagher Aggregates Limited dated 15 June 2026](#)
 - B [Aggregates Need & Supply – Planning Context. Hearnshaw Planning, January 2026](#)
 - C [Premium Limestone and Kentish Ragstone Masonry – Planning Context. Hearnshaw Planning, January 2026](#)
 - D [Gallagher Aggregates Example Markets and Projects. Gallagher Aggregates, March 2026](#)
 - E [Ecological Assessment. Ecology Solutions Limited, March 2024](#)
 - F [Biodiversity Net Gain Assessment/Hazel Dormice. Ecology Solutions Limited, March 2024](#)
 - G [Biodiversity Net Gain Assessment/Hazel Dormice. Ecology Solutions Limited, October 2024](#)
 - H [Annual Report to Management Advisory Group \(Westerly Extension\). Red Ecology, November 2025](#)
 - I [Technical Note: Ecology Statement – Research and Case Studies. Red Ecology, February 2026](#)
 - J [Wessex Archaeology – Ecology Note \(Summary of reports included as Appendices K, L and U\). Ecology Solutions Limited, March 2024](#)
 - K [Geoarchaeological Borehole Survey Interim Report. Ecology Solutions Limited, March 2024](#)
 - L [Interim Report on the Geochemical Analysis. Ecology Solutions Limited, March 2024](#)
 - M [Alternative Sites Study – Kent](#)
 - [Main Document](#) and Appendix A: [Detailed Assessment for Sites \(A/25&30 Pikey Lane and East Malling Heath; Site D/51-Ditton South; Site E/55-Small Profits West; Site H/94 Langley Park; Site I/101 Stoneacre Farm; Site J/106 Leeds South East; Site K/107-Burberry Lane Site O/115-Cheqworth; and Dwq.GAL-HQ-23-11-B](#)

- showing site locations. Hearnshaw Planning/Gallagher Aggregates, January 2024
- [Geological Information. Hearnshaw Planning/Gallagher Aggregates, February 2024](#)
 - N [Qualitative Assessment of Premium Crushed Rock. Gallagher Aggregates, November 2023](#)
 - O [Carbon Footprint Study for Freight Aggregates. Carbon Footprint, January 2024](#)
 - P [GHG Emissions Savings Analysis for Reduction Measures used Hermitage Quarry. Carbon Footprint, January 2024](#)
 - Q [Review of Kent Planning Policies – Embodied Carbon and Sustainability Considerations. DHA Consulting, December 2023](#)
 - R [Gallagher Aggregates - Social Value Overview. Gallagher Group, Collins McHugh Limited, March 2026 \(Amended Apr 2026\).](#)
 - S [Natural Capital Report. Savills, May 2024](#)
 - T [Proposed Landscape Strategy 2024 Draft. Hill-Wood and Co. April 2024](#)
 - U [Archaeological Desk Based Assessment. Wessex Archaeology, March 2024](#)
 - V [Transport Technical Note including Air Quality/Environmental Aspects. Stantec, December 2023](#)
 - W [Services and Utilities. Feedback from communications with UK Power Networks \(UKPN\)](#)
 - X [Initial review of proposed extension on land to the South and West of Hermitage Quarry in relation to blast vibrations. Blast Log Ltd, December 2023](#)
 - Y1 [Proposed Site Allocation Plan. Gallagher Aggregates GAL-HQ-26-10](#)
 - Y2 [Existing Condition Plan Gallagher Aggregates GAL-HQ-26-20 and Indicative Quarry Phasing Nos 1-4 Gallagher Aggregates GAL-HQ-26-21 , 22, 23 and 24](#)
 - Z [Hermitage Quarry – Completed Restoration Areas. Gallagher Aggregates GAL-HQ-26-06](#)
- 6no. WSP Reports – Assessment of Impacts of Nominated Land to the South and West of Hermitage Quarry for Hard Rock, April 2026
 - [Ecology Assessment, June 2026](#)
 - [Alternative Ragstone Supplies Assessment, 16 June 2026](#)
 - [Landscape Assessment, 15 June 2026](#)
 - [Carbon Assessment for Potential Extension of Hermitage Quarry, June 2026](#)
 - [Air Quality Assessment for Potential Extension of Hermitage Quarry, June 2026](#)
 - [Health Assessment of Impact, 15 June 2026](#)
 - [Nomination of Hermitage Quarry for Allocation – Socio-Economic Impact Assessment, BPP Consulting, June 2026](#)
 - [Strategic Cooperation Statement, Regulation 19 Kent Minerals Sites Plan, June 2026](#)
 - [Secretary of State for Department of Communities and Local Government, Decision Letter, Hermitage Quarry, Hermitage Lane, Aylesford, Application Ref. TM/10/2158341 dated 11 July 2013](#)

- [Pre-Submission Draft Kent MSP July 2026 – showing TRACKED CHANGES](#)

13. Contact details

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Kent Minerals and Waste Local Plan 2024-39

Draft Kent Mineral Sites Plan

July 2026

Regulation 19 Pre-Submission Draft

Clean Untracked Version

Please note the text in the following 'Have Your Say' section is not part of the Plan and will be removed from the adopted Plan.

Have Your Say

Making Representations on the Pre-Submission Draft Kent Mineral Sites Plan – July 2026

The County Council is inviting representations on the Pre-Submission Draft Kent Mineral Sites Plan which, once adopted, will update the current adopted Kent Mineral Sites Plan 2020.

Stakeholders, interested parties and the local community are invited to make representations on the content of the Pre-Submission Draft Kent Mineral Sites Plan before the Plan is submitted for independent examination. Representations should relate to whether the Plan has been prepared in accordance with the relevant legal and procedural requirements and whether it is sound.

The period for representations runs from XXX July 2026 to midnight on XXX 2026 (Exact Dates TBC).

Representations received will be considered by an independent Planning Inspector appointed to assess whether the Plan is legally compliant and sound.

This Plan will provide the site-specific component of minerals planning in Kent and should be read alongside the Kent Minerals and Waste Local Plan 2024-39. It identifies the sites that the County Council proposes to allocate to help meet requirements for sharp sand and gravel, soft sand and hard rock, and sets out site-specific development management criteria which would need to be satisfied by any subsequent planning application.

It should be noted that there are no substantive changes proposed to the sites allocated in the current Kent Mineral Sites Plan which was adopted in September 2020. The current Kent Mineral Sites Plan 2020 allocates land at Chapel Farm West, Lenham for a soft sand quarry and land at Moat Farm, Capel and an extension to Stonecastle Farm Quarry, Hadlow for two sharp sand and gravel quarries to be worked sequentially.

This Pre-Submission Draft Kent Mineral Sites Plan also includes a proposed allocation of land to the south and west of Hermitage Quarry, Aylesford for hard rock extraction. The proposed allocation and its associated development management criteria have been informed by the previous consultation, supporting evidence base and the technical assessments undertaken in relation to the site.

It is also of note that the allocation of a site does not equate to the grant of planning permission. Any proposal for the development of an allocated site would need to secure planning consent and satisfy the requirements of the development plan and planning policy considerations at that time.

Regulation 19 – Pre-Submission Draft Kent Mineral Sites Plan July 2026

This document should be read together with the Sustainability Appraisal and the other supporting evidence prepared to inform the Plan. The evidence base and supporting documents are available on the County Council's website and include:

- Assessment of how the proposed allocation of land to the south and west of Hermitage Quarry for hard rock extraction is consistent with planning policy;
- Other technical assessments which consider the impact of quarrying development at land to the south and west of Hermitage Quarry on:
 - Ecology
 - Health
 - Air Quality
 - Carbon emissions
 - Landscape
 - Socio-economics
- Assessment of Alternatives to Supplies of Kentish Ragstone from land to the south and west of Hermitage Quarry;
- Equalities Impact Assessment.

You can make representations on the Pre-Submission Draft Kent Mineral Sites Plan and the associated Sustainability Appraisal as well as other supporting evidence through the following options:

- Complete our online comments form via our website at XXX (preferred method)
- Upload your completed comments form or written submission to our online consultation portal at XXX
- Email your completed representation form or written submission to mwlp@kent.gov.uk
- Post your completed representation form or written submission to Minerals and Waste Planning Policy, Sessions House, County Hall, Maidstone, Kent, ME14 1XQ

Please note that it will help us process representations more efficiently if they are received via our online representations form.

Once the consultation has closed, the Minerals and Waste Planning Policy Team will collate the representations received. The Pre-Submission Draft Kent Mineral Sites Plan, its supporting documents and the representations received will then be submitted to the Secretary of State for independent examination.

Hard copies of the main publication documents will be available to view at the main County Council office, Sessions House, County Hall, Maidstone, Kent, ME14 1XQ, between the hours of 9am and 5pm, Monday to Friday, for the duration of the six-week publication period.

Should you have any queries, please email a member of the Minerals and Waste Planning Policy team via the following address: mwlp@kent.gov.uk.

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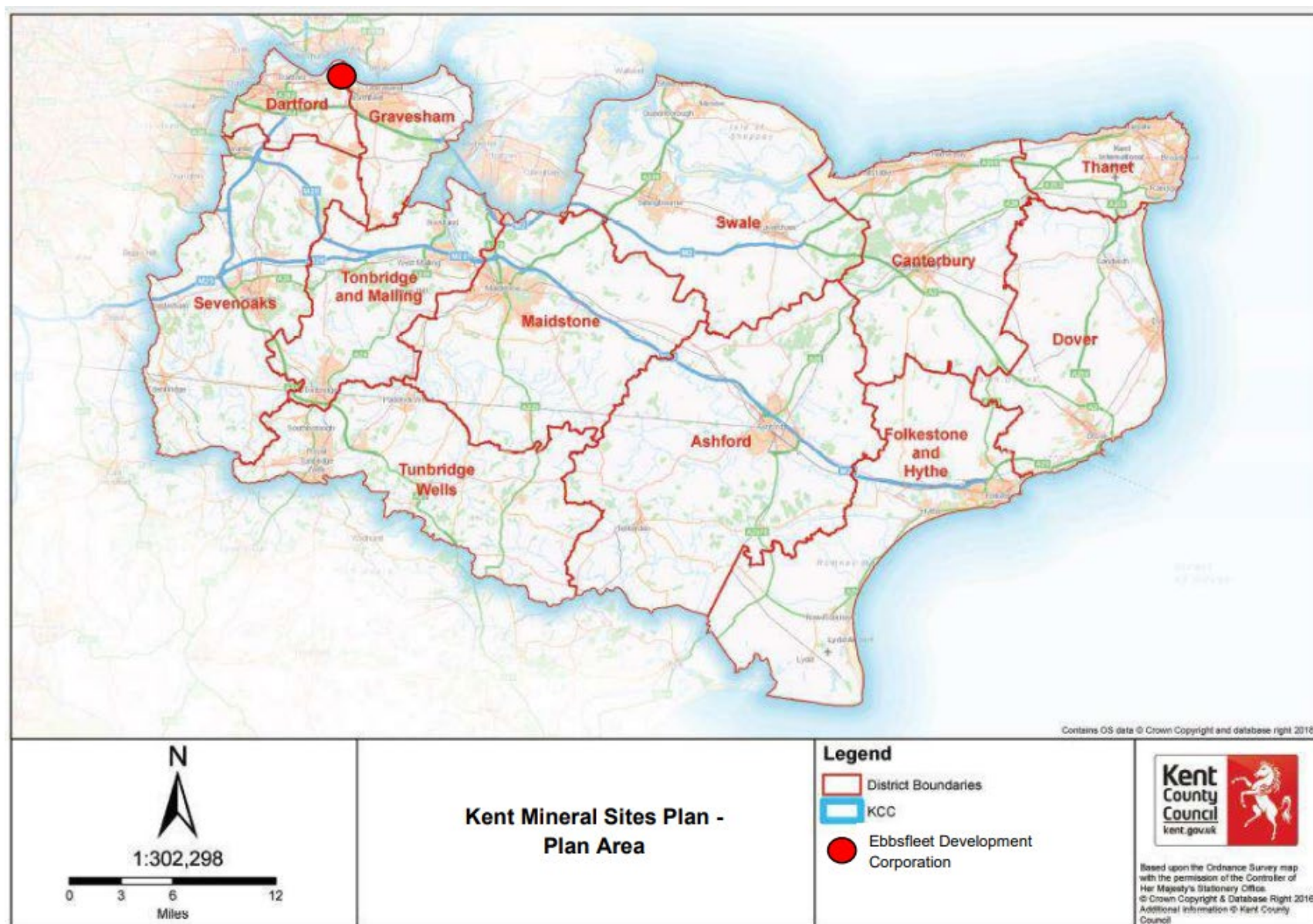
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Abbreviations

AQMA	Air Quality Management Area
BAP	Biodiversity Action Plan
DEFRA	Department for Environment, Food and Rural Affairs
EA	Environment Agency
EIA	Environmental Impact Assessment
HER	Historic Environment Record
HRA	Habitats Regulations Assessment
KMWLP	Kent Minerals and Waste Local Plan
LAA	Local Aggregates Assessment
LWS	Local Wildlife Site
M	Metre
mtpa	Million tonnes per annum
km	kilometre
KMWLP	Kent Minerals and Waste Local Plan
NPPF	National Planning Policy Framework
PAWS	Plantation on Ancient Woodland Site
PM	Particulate matter
PPG	Planning Practice Guidance
PROW	Public Right of Way
SA	Sustainability Appraisal
SPZ	Source Protection Zone
SSSI	Site of Special Scientific Interest
tpa	Tonnes per annum
WWTW	Wastewater Treatment Works

1. Introduction

- 1.1 Kent County Council has responsibility for the planning of future mineral supply for the county. This is met by the preparation and adoption of the Kent Minerals and Waste Local Plan (KMWLP) and a Kent Mineral Sites Plan (the Sites Plan). The Plan area for this document is the administrative area of Kent and so does not include 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 of the Hythe Formation)). 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 coastline. Kent also has non-aggregate minerals, these 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 are also 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, soft sand and hard rock in accordance with Policy CSM 2 of the Kent Minerals and Waste Local Plan 2024-39. This updated Kent Mineral Sites Plan identifies suitable locations for the extraction of sharp sand and gravel, soft sand and hard rock, 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 The Kent Mineral Sites Plan forms part of the Development Plan and should be read alongside the Kent Minerals and Waste Local Plan 2024-39 as well as relevant Local Plans.



2. The Policy Context

Kent Minerals and Waste Local Plan

- 2.1 The Kent Minerals and Waste Local Plan 2024-39 (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 six 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). Chapter 7 includes the development management policies (DM policies), which seek 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, landowners and other interested stakeholders as to where minerals development is likely to take place.
- 2.4 Policy CSM 2 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 the Mineral 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 Mineral Sites Plan - Matters Considered

- 2.5 For a site to be allocated in the Sites Plan, Policy CSM 2 requires site allocations to meet the following criteria:
- There has to be a requirement for the mineral;
 - consistency with relevant development management criteria included in policies in the KMWLP;
 - consistency with relevant policies in district local and neighbourhood plans;
 - assessment based on strategic environmental information including Habitat Regulation Assessment as appropriate;
 - deliverability; and
 - consistency with other relevant national planning policy and guidance.

- 2.6 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.
- 2.7 District and Borough Councils in Kent have adopted 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 part of the 'Development Plan'.
- 2.8 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. There has been ongoing discussion and consultation with neighbouring mineral planning authorities, especially those within the South East Region in respect of need considerations for sharp sand and gravel, soft sand and hard rock. 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 also informed the Mineral Sites Plan. The County Council will continue to work closely with adjoining authorities on strategic cross boundary matters.
- 2.9 In accordance with the requirements of the Habitats Directive 1992, the Sites Plan 2020 has been subject to Habitats Regulations Assessment (HRA). This work has helped to inform which sites should be included for allocation within the Sites 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. The allocation for hard rock does not impact on international designations and therefore HRA is not required.
- 2.10 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 Mineral Sites Plan has also been prepared in accordance with the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (PPG) for Minerals.
- 2.11 The Town and Country Planning (Local Planning) (England) Regulations 2012 require local planning authorities to review their local plans every five years to ensure that the policies remain relevant, conform to national policy and guidance, and satisfactorily address the needs of the local community. An updated Kent Minerals and Waste Local Plan (2024-39) was adopted in 2025, which identified the need to allocate an additional site for the working of hard rock. This is to ensure the required steady and adequate supply of mineral provision over the extended plan period (2024-39).

- 2.12 The updated Kent Minerals and Waste Local Plan (2024-39) did not identify any need for further allocations for soft sand and sharp sand and gravel. The need for allocations in future will be subject to ongoing assessment via the production of an annual Local Aggregates Assessment.
- 2.13 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.
- 2.14 Development of the allocations in 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 2024-39, along with other local plans and relevant national policies.

3. Provision of Mineral Sites

- 3.1 The Mineral Sites Plan allocates sites for the extraction of soft sand, sharp sand and gravel and hard rock. 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 CSM 2 of the adopted KMWLP, will provide sufficient minerals during the Mineral Sites Plan period for the identified soft sand and hard rock requirements and make an effective contribution to the supply of land-won sharp sand and gravel.

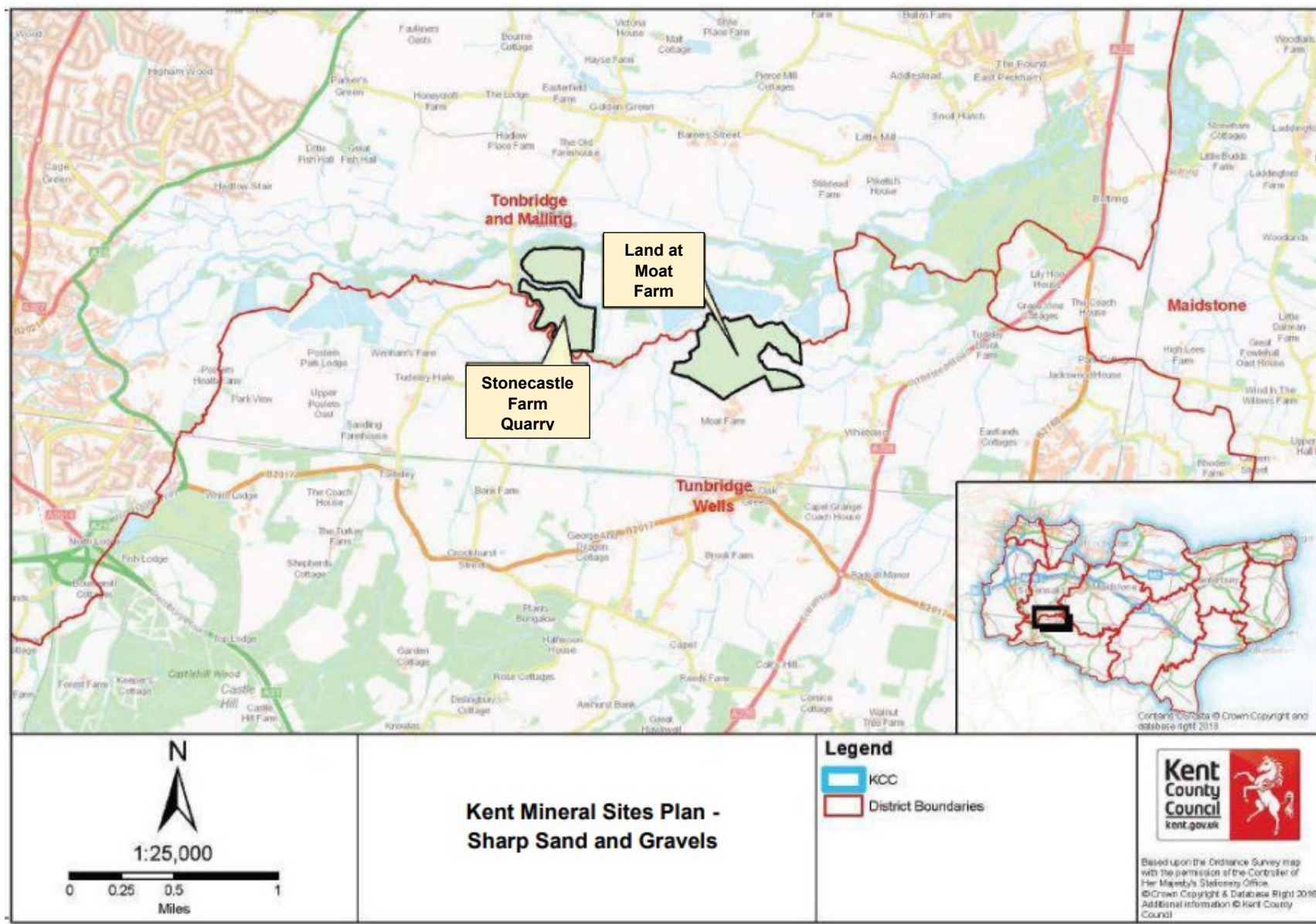
Sharp Sand and Gravel

- 3.2 Policy CSM 2 of the adopted Kent Minerals and Waste Local Plan 2024-39, in compliance with national policy, commits the County Council to make provision for at least a 7-year landbank for land-won sharp sand 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 Mineral Sites Plan period (2024-2039) including provision for an at least 7-year landbank to be available at the end of this Plan period.
- 3.4 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.

Two sharp sand and gravel sites are allocated to contribute to the steady and adequate supply of sharp sand and gravel, as set out below:

- **Stonecastle Farm Quarry Extensions, Hadlow** - an extension to the existing quarry (total yield of 1,000,000 tonnes), and
- **Land at Moat Farm, Capel** - a proposed new quarry (total yield of 1,500,000 tonnes)

- 3.5 Details of the sites and the development criteria are shown on the Kent Mineral Sites Plan - Sharp Sand and Gravels map and in Appendix 1.
- 3.6 The total yield of the sites suitable for allocation is 2.5mt. Reserves at the end of 2025 are estimated to be 2.09mt. The Plan requirement to 2039 (end of the Plan period) is 3.02mt, which includes a 7-year landbank being maintained at the end of 2039. With no replenishment of reserves, this would result in a deficit of 0.93mt over the Plan period. Development of the two allocations would result in a surplus of 1.57mt. Kent has become increasingly dependent on alternative sources to meet the demand for sharp sand and gravel. Further increases 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 LAA 2024). 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 are seen as making a contribution to overall supply compared to primary aggregates.
- 3.7 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

- 3.8 Policy CSM 2 of the adopted Kent Minerals and Waste Local Plan 2024-39, 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.
- 3.9 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 Mineral Sites Plan period (2024-2039), including provision for at least a 7-year landbank to be available at the end of this Plan period.
- 3.10 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.
- 3.11 The Kent Minerals and Waste Local Plan 2024-39 was based on data to the end of 2022 that identified a required provision over the life of the Plan period of 7.125mt of soft sand and at least 7 years supply (3.325mt). This is a total requirement of 10.67mt. More recent sales and reserves data show that the requirement to 2039 is now 9.70mt. The available reserves estimated at the end of 2025 of 3.99mt give an overall estimated shortfall for the Plan period (2039) of 5.71mt.
- 3.12 To address this estimated shortfall, 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 - a proposed new quarry (total yield of 3,200,000 tonnes);
- This would reduce the calculated shortfall to 2.51mt. An anticipated windfall of at least 0.84mt from non-mineral developments (including the Otterpool Park settlement) would further reduce this calculated shortfall. At least a 7-year landbank is anticipated to be available until at least 2033, by which time a number of statutory plan reviews would have occurred, evidencing the need for further allocations. This approach is consistent with the Kent Minerals and Waste Local Plan 2024-39. For the period up to 2039, there is no exhaustion of soft sand reserves.
- 3.13 Details of the site and the development criteria are shown on the Kent Mineral Sites Plan - Soft Sand map and in Appendix 1.

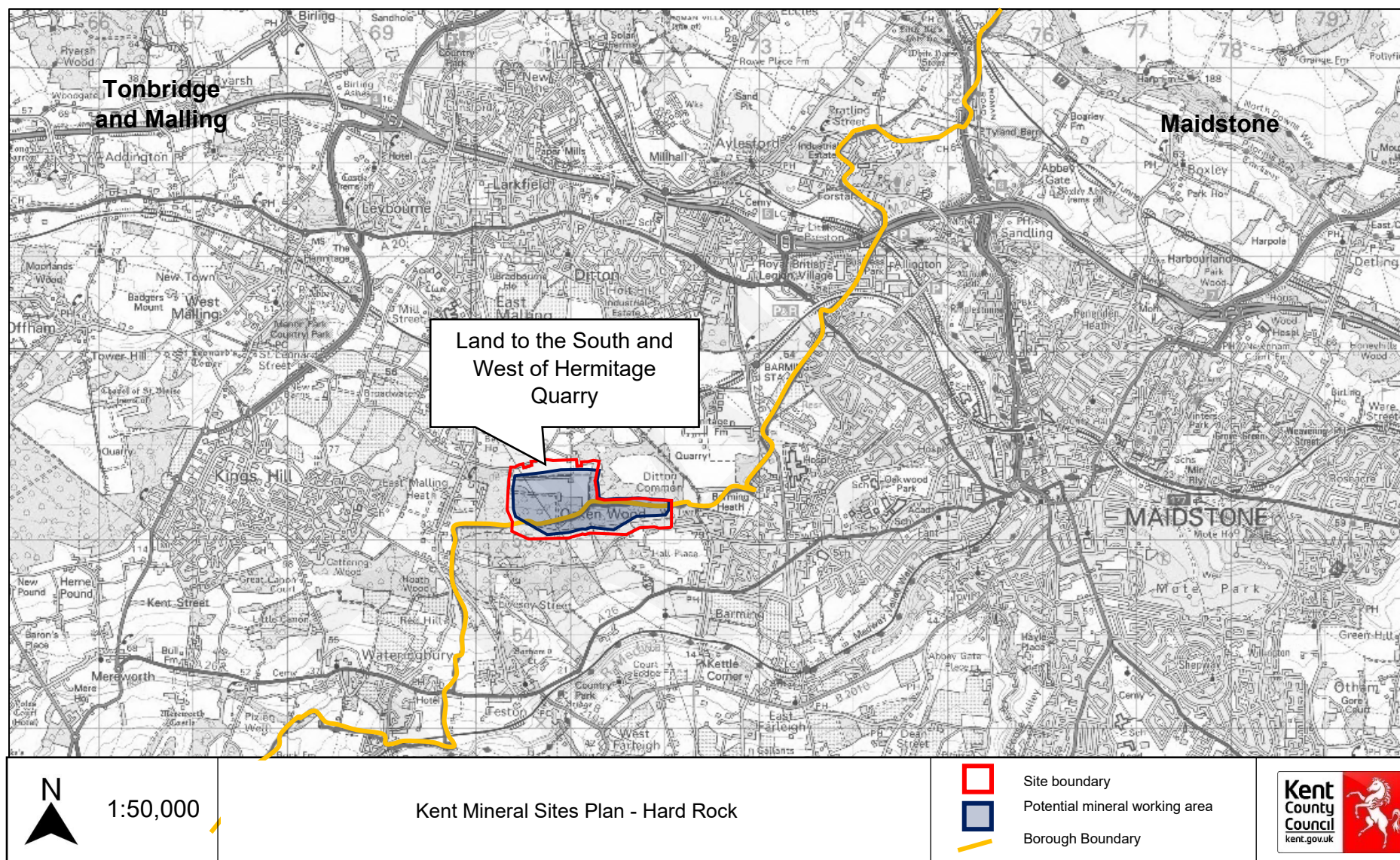
- 3.14 Any proposal for the development of the above allocation must address the development management considerations set out for the site in Appendix 1, in addition to any other planning considerations relevant to the development, and that any adverse impacts will be mitigated to the satisfaction of the Mineral Planning Authority.

Hard Rock

- 3.15 Policy CSM 2 of the adopted Kent Minerals and Waste Local Plan 2024-39, in compliance with national policy, commits the County Council to make provision for at least a 10-year landbank for hard rock throughout the Plan period and at its end, based on the current monitored local annual supply requirement for Kent.
- 3.16 The local annual supply requirement is established annually through the Local Aggregates Assessment (LAA) process and has taken the average of the previous rolling 6 years' sales averages to predict future annual sales. A 6-year sales average is used instead of 10 years because a significant change in the sales pattern of land-won hard (crushed) rock in Kent had been observed, which is likely to be sustained, and so use of a 10-year average would underestimate requirements.
- 3.17 The supply of locally extracted hard rock will be sourced from:
- Existing permitted sites;
 - New site(s), including potential allocations, in an updated Kent 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 and guidance.
- 3.18 The Kent Minerals and Waste Local Plan 2024-39 was based on data to the end of 2022 that identified a total required provision over the life of the Plan period of 31mt of hard rock. More recent sales and reserves data collected show that the overall Plan requirement increased to 30.72mt. The reserves at the end of 2025 were estimated to be around 10.8mt, giving a shortfall of 19.9mt over the Plan period.
- 3.19 One site is allocated to contribute to the steady and adequate supply of hard rock, subject to demonstrating at planning application stage compliance with the development management criteria set out below and national and local planning policy:
- Land to the South and West of Hermitage Quarry - a proposed new quarry (total yield up to c.23mt)
- 3.20 Details of the site and the development criteria are shown on the map Kent Mineral Sites Plan – Hard Rock and in Appendix 1.

- 3.21 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.

DRAFT



The red line boundary shows the extent of the allocated site which includes indicative stand-offs and buffers between the mineral working area (blue shaded area) and adjacent land uses. The blue shaded area shows the indicative area from where hard rock may be extracted. The exact area to be extracted will be confirmed at the planning application stage.

Appendix 1

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 Mineral 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 Mineral Sites Plan.

Development Management Criteria

All proposals for development at the allocated sites are required to comply, as appropriate, with the policies of the Kent Minerals and Waste Local Plan and any other relevant parts of the development plan, together with national policy and other material considerations. Proposals should therefore be consistent with those policies in addition to the development management criteria set out below. These criteria do not replace, override or reduce the need to demonstrate compliance with the wider policy framework; rather, they are intended to draw attention to particular matters that are likely to require careful consideration in relation to each site and to assist in the preparation and assessment of any future planning application.

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 the criteria should not be considered 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.

Extensions to Stonecastle Farm

Extensions to Stonecastle Farm Quarry, Hadlow/Whetsted

Proposed Development: Extraction of sharp sand and gravel (Sub-Alluvial River Terrace Deposits)

Site Location: Hadlow, Tonbridge

Grid Reference: E 146908, N 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 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, the Moat Farm Site 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 DM 11 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, and measures to be taken to provide a net gain in biodiversity.
- 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 so as to not impact on the designation directly or indirectly.
- A 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.

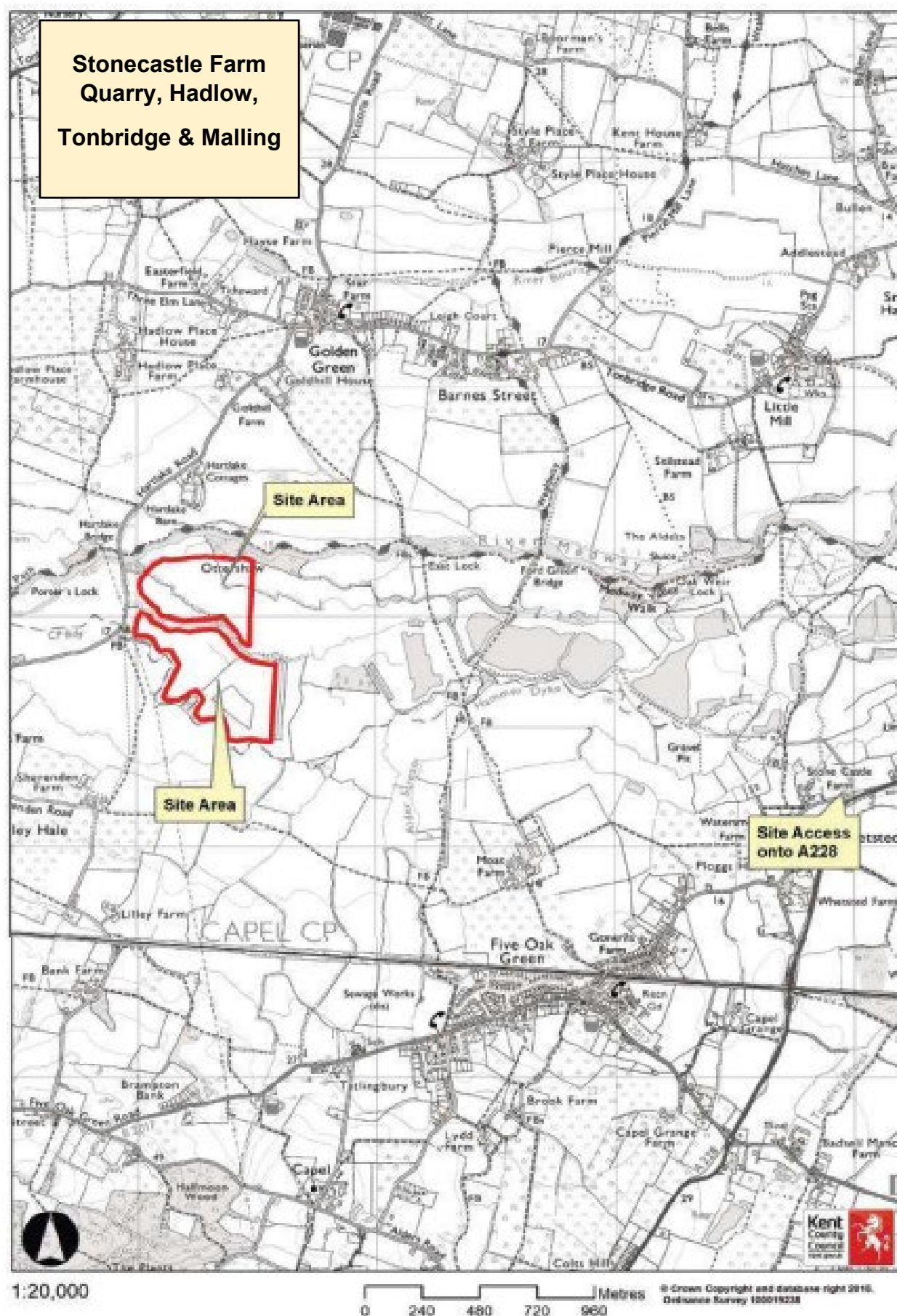
- Suitable buffer zones and mitigation to be proposed to mitigate impacts to Local Wildlife Site TM20.
- The developer to appropriately manage the Nuttall's pondweed and Crassula in the area.
- The need for compensatory replacement habitat should be considered.

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 nearby Listed Buildings and their settings should be fully assessed and mitigation measures undertaken to avoid unacceptable adverse impacts.
- Any planning application should be accompanied by a full archaeological impact assessment to ascertain the extent of any remains.

Green Belt

- The site is located within the Metropolitan Green Belt and any proposal for development of the site must demonstrate how it is consistent with national and local policy on development within the Green Belt.



Moat Farm

Moat Farm, Capel, Tonbridge

Proposed Development: Extraction of sharp sand and gravel (Sub-Alluvial River Terrace Deposits)

Site Location: Five Oak Green, Capel, Tonbridge; Grid Reference: E 564578, N 146400; District/Borough Council: Tunbridge Wells; Parish: Capel

Site Area: 38.2 hectares

Estimated Mineral Reserve: 1,500,000 tonnes

Existing Land Use: Agriculture

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 DM 13.
- 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, and HGVs 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, the Moat Farm Site and the permitted Stonecastle Farm Quarry shall not be worked concurrently.
- Proposals for the diversion of the PROW will be required to show how connectivity of the surrounding PROW network will not be lost.

Water Resources

- A 16-metre buffer should be provided between extraction areas (and areas that have been extracted) and nearby watercourses (including ditches) 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.
- Any application will need to be accompanied by a detailed flood risk assessment with measures identified to minimise and/or mitigate flood risk.
- The site overlies the gravel aquifer and is near the edge of an SPZ3 for a public water abstraction borehole. Wet working, being the extraction of materials from below the water table level, should be employed to negate the need to de-water the active quarried areas.
- A regime of local water quality monitoring is required to be agreed with the Environment Agency and South East Water.

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, and measures to be taken to provide a net gain in biodiversity.
- Any operations should exclude the Ancient Woodland and a suitable buffer should be employed so as to not impact on the designation directly or indirectly.

Health and Amenity

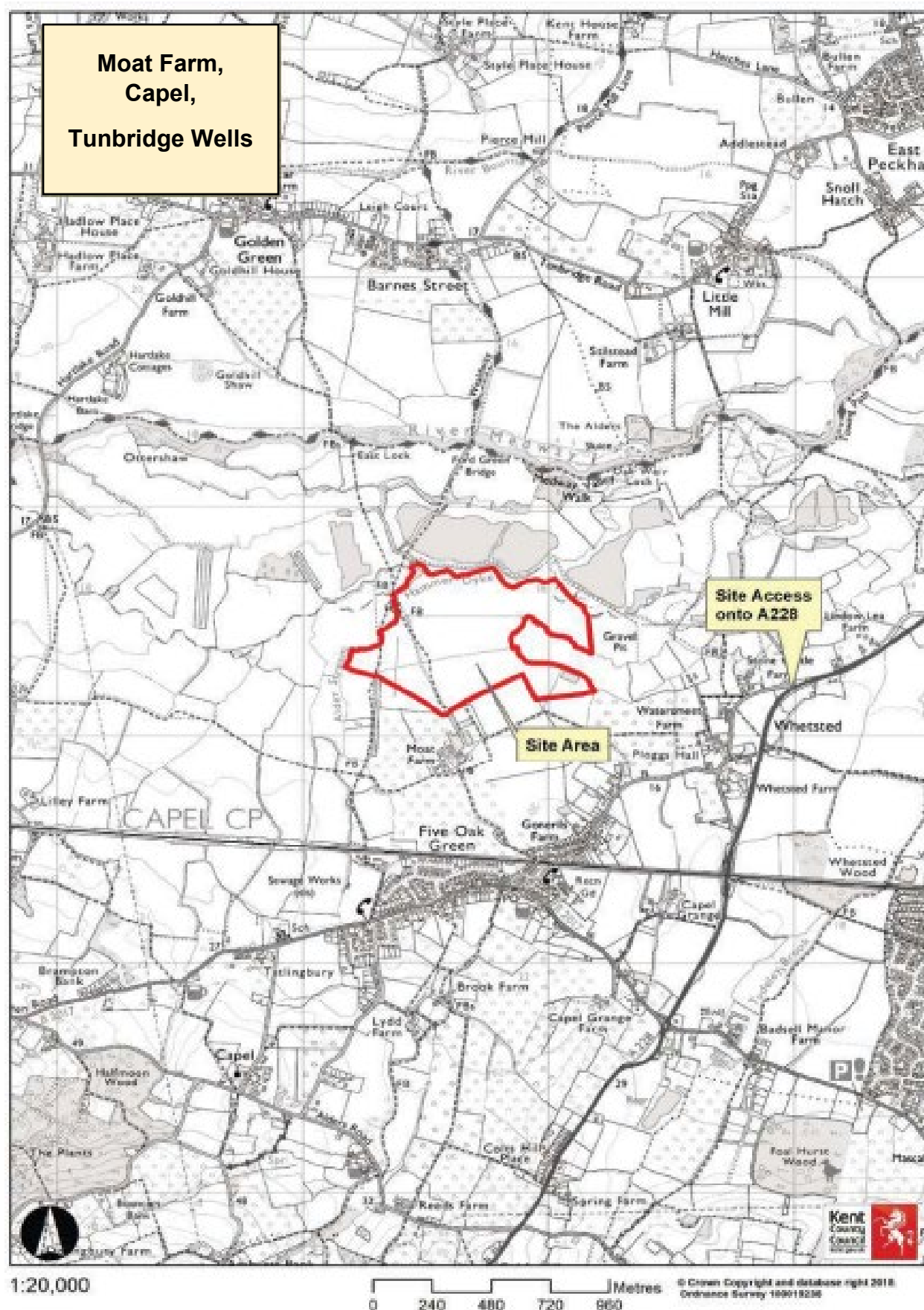
- Compliance with policy DM 11 of the Kent Minerals and Waste Local Plan in respect of health and amenity.
- A lighting, noise, dust and vibration management plan should be completed, setting out how unacceptable impacts will be avoided. A detailed dust assessment and management plan should be submitted 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.
- The impact of proposals upon nearby Listed Buildings and their settings should be fully assessed and mitigation measures undertaken to avoid unacceptable adverse impacts.

Green Belt

- The site is located within the Metropolitan Green Belt and any proposal for development of the site must demonstrate how it is consistent with national and local policy on development within the Green Belt.



Chapel Farm

Chapel Farm, Lenham (Western Site)

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

Site Location: Lenham, Maidstone; Grid Reference: E 590223, N 150704; District/Borough: Maidstone

Parish: Lenham

Site Area: 35.4 hectares

Estimated Mineral Reserve: 3,200,000 tonnes

Existing Land Use: Agriculture

Proposed Restoration: Low-level restoration to agriculture using existing soils

Development Management Criteria

The Chapel Farm, Lenham (Western Site) 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 and protected trees 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. A detailed ecological appraisal is required (including all recommended species/habitat surveys), setting out any mitigation measures needed to ensure there are no unacceptable adverse impacts on Kent's important biodiversity assets.
- Detailed restoration proposals should set out measures to be taken to provide a net gain in biodiversity.

Landscape

- Detailed information setting out proposed mitigation of landscape and visual impacts demonstrating that the setting of, and views into and out of, the Kent Downs National Landscape 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. The impact of proposals upon the Listed Buildings and their settings should be fully assessed, and mitigation measures undertaken to avoid unacceptable adverse impacts.
- Any planning application should be accompanied by a full archaeological impact assessment to ascertain the extent of any remains.

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;
 - The underlying 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.

Transport and Access

- A detailed Transport Assessment to demonstrate compliance with KMWLP Policy DM 13.
- The Transport Assessment should consider the 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.
- Public Rights of Way (PROWs) that run adjacent and within the site will require appropriate diversions and screening to mitigate any impact on the PROW network as necessary.
- The site will only be worked sequentially to the permitted site at Burleigh Farm, Charing.

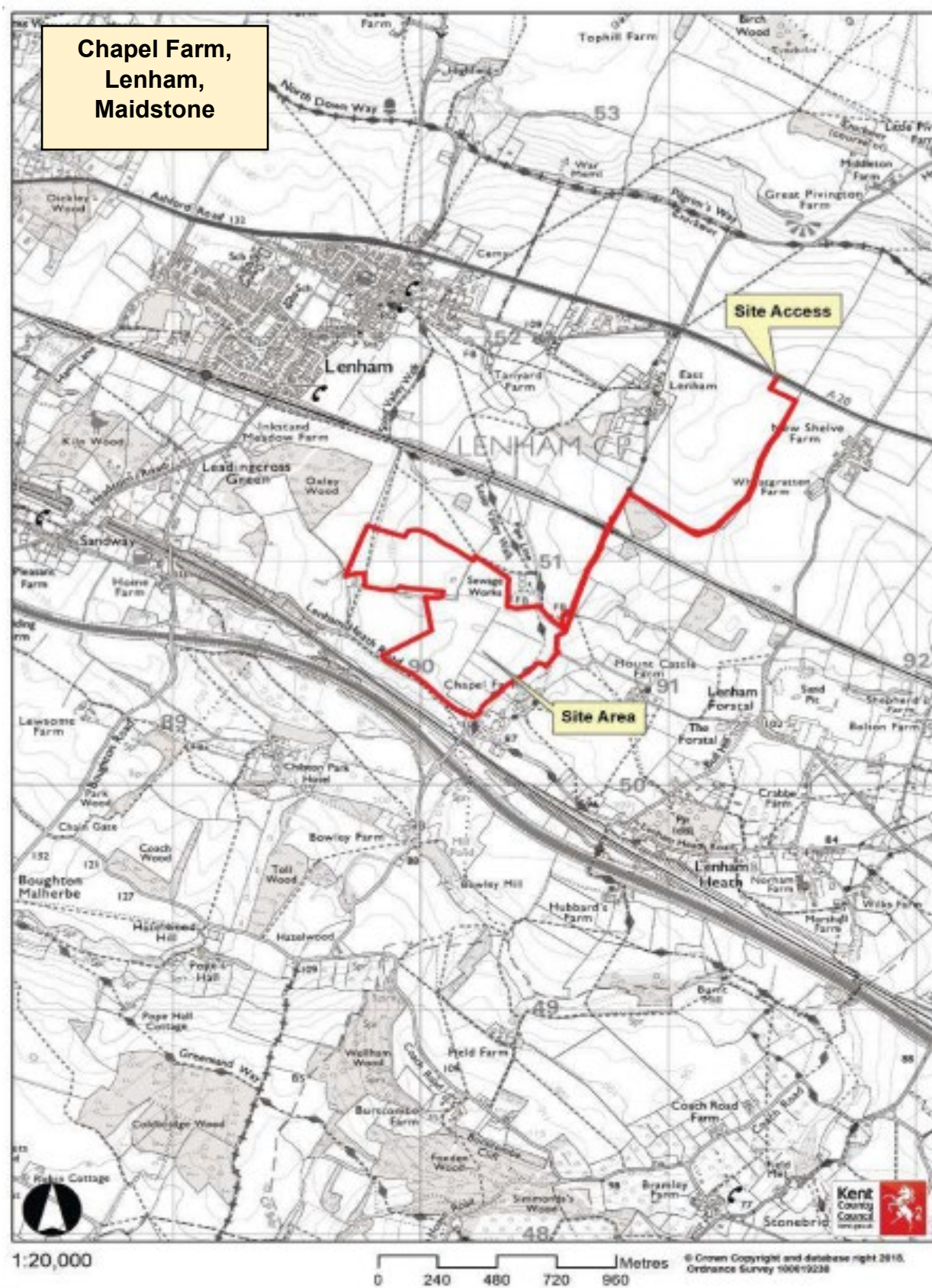
Utilities

- 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 DM 11 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).

DRAFT



Land to the South and West of Hermitage Quarry, Aylesford

Proposed Development: Extraction of hard rock of the Limestone Hythe Formation (Kentish Ragstone)

Site Location: Hermitage Quarry, Hermitage Lane, Aylesford, Kent, ME16 9NT

Grid Reference: Approximately centred on TQ 70745 55403

District/Borough Council: Tonbridge and Malling Borough (northern part of site) and Maidstone Borough (southern part)

Parish: East Malling and Larkfield Parish (TMBC), Ditton Parish (TMBC) and Barming Parish (MBC)

Site Area: The site covers an area of c.96 hectares, from within which an area of up to 49 hectares could be worked, subject to planning constraints

Estimated Mineral Reserve: c.23 million tonnes of Ragstone hard rock.

Yield: Potential maximum c.23 million tonnes - this would depend on planning constraints which would require appropriate stand-offs from sensitive land uses

Existing Land Use: Meadow and woodland

Proposed Restoration: The land would be restored to original levels with inert restoration materials (circa 500,000 tonnes per annum) and returned to mixed native woodland and meadow, subject to biodiversity net gain requirements.

Note: The boundary of the site shown below is land within the control of the promoter, within which there is a known hard rock mineral resource. The potential extraction area would depend on planning constraints, which would require appropriate stand-offs from sensitive land uses.

Development within the allocation would allow a continuation of the established Hermitage Quarry.

Development Management Criteria

Land to the South and West of Hermitage Quarry, Aylesford is acceptable in principle for mineral development, subject to compliance with the development management considerations, with particular reference to:

General extent of development and phasing

- Mineral working shall be confined to the area demonstrated through detailed technical assessment to be environmentally acceptable, with the final extraction boundary, stand-offs and buffers informed by up-to-date ecology, landscape, hydrology, blasting, air quality, heritage and amenity evidence. The proposed extraction area should reflect the reduced working area now identified through subsequent technical work and should not assume that the whole nominated area is workable.
- The site shall only be worked sequentially with the permitted phases of Hermitage Quarry, including restoration and screening works, so that impacts are not materially greater than those arising from existing permitted operations.
- A phasing and sequencing plan shall be submitted showing:
 - The order of extraction; the timing of soil stripping, screening bunds, advance planting and restoration;
 - the relationship to existing workings and restoration areas; and
 - how woodland connectivity, visual screening, public access and amenity protection would be maintained throughout the operational life of the site.

Need, alternatives and irreplaceable habitat

- Sufficient information should be provided to enable the Mineral Planning Authority to determine whether development resulting in the loss or deterioration of irreplaceable habitat is justified, including updated evidence on need, alternatives, and the contribution that substitute, recycled and secondary materials could make to supply.
- Any planning application that would result in the loss or deterioration of ancient woodland, including Plantation on Ancient Woodland Site (PAWS) or ancient or veteran trees, shall be supported by sufficient information to enable the Mineral Planning Authority to determine whether the relevant national and development plan policy tests for irreplaceable habitat are met. This shall include evidence of need, alternatives, the design of the working scheme (including phasing) to demonstrate how the final extraction boundary, working method, stand-offs and buffers have avoided and, in turn, minimised the loss or deterioration of ancient woodland as far as practicable.
- Any such application shall include a detailed Ancient Woodland (PAWS) Impact Assessment, based on current ecological, arboricultural, forestry and soil surveys. This shall identify and quantify the full extent of direct and indirect impacts on ancient woodland (PAWS) and associated ecological features, including woodland soils, seedbank, coppice stools, ancient, veteran or notable trees, deadwood, ground flora, fungi, protected and notable

species, hydrology, dust, light, noise, vibration, fragmentation and woodland connectivity. The assessment shall distinguish clearly between ancient woodland (PAWS), other woodland habitats and other habitats affected by the proposal.

- The loss and deterioration of ancient woodland (PAWS) means the application must include a detailed ‘Ancient Woodland Compensation Strategy’. The strategy must acknowledge that ancient woodland (PAWS) and any veteran or ancient trees are irreplaceable habitat and so compensation does not provide like-for-like replacement. The Strategy shall clearly distinguish between:
 - Measures to avoid and mitigate harm;
 - compensation for the loss or deterioration of ancient woodland/PAWS and any veteran or ancient trees;
 - protected species mitigation;
 - quarry restoration and aftercare; and
 - biodiversity net gain (relating to land to be developed not designated as ancient woodland).
- The Compensation Strategy shall be proportionate to the final area, condition and ecological function of ancient woodland (PAWS) and any veteran or ancient trees to be lost or deteriorated. The starting point for the strategy shall be a package at least equivalent in scale and ecological purpose to that identified for the allocation, unless the planning application demonstrates that the final design would materially reduce the loss or deterioration of ancient woodland (PAWS), avoid the loss of veteran or ancient trees or would secure an alternative package of demonstrably equivalent or greater ecological value.
- For the purposes of this criterion, the package identified at allocation stage comprises, in broad terms:
 - Translocation and reuse of soils from PAWS to be removed;
 - restoration of the worked area to native broadleaved woodland;
 - creation and management of approximately 49ha of woodland within the extraction/restoration area;
 - at least 97ha of habitat creation, restoration and/or active woodland management on land within the operator’s control at Hermitage Quarry; and
 - at least 57ha of additional habitat creation, restoration and/or woodland management on land currently outside the operator’s control, to be secured where necessary either adjacent to Hermitage Quarry or within Kent.
- The proposed Compensation Strategy shall include, as appropriate:
 - Translocation and re-use of ancient woodland (PAWS) soils and other transferable woodland features, including coppice stools, deadwood and seedbank material where this is ecologically justified and feasible;
 - restoration of worked areas to native broadleaved woodland using appropriate locally native species and soil handling methods;
 - the long-term management of the translocation and quarry restoration sites;
 - creation and long-term management of new native woodland and associated habitats on land within the applicant’s control;

- active restoration, long-term management and enhancement of retained PAWS and other woodland within and adjoining the site, including Oaken Wood where relevant;
 - additional off-site native woodland creation and/or restoration or management of existing woodland/PAWS within Kent where this is required to secure the overall compensation package;
 - measures to maintain and strengthen woodland connectivity and ecological resilience during and after mineral working; and
 - compensation for loss of any veteran or ancient trees.
- Notwithstanding the above, provision of compensation measures should be prioritised on land within or adjacent to the allocated site. For compensation sites not adjacent to Hermitage Quarry, evidence shall be provided to demonstrate the appropriateness of that location.
- Traditional orchard, neutral grassland or other non-woodland habitat creation may contribute to wider biodiversity enhancement, protected species mitigation, restoration objectives or biodiversity net gain, but shall not be relied upon as direct compensation for the loss or deterioration of ancient woodland (PAWS) unless its role as compensation is specifically justified and accepted by the Mineral Planning Authority. Where any such habitat is required for species mitigation, restoration or biodiversity net gain, equivalent additional native woodland creation and/or ancient woodland/PAWS restoration or management shall be secured so that there is no reduction in the ancient woodland compensation package.
- The Compensation Strategy shall demonstrate that there is no double counting between:
 - Ancient woodland/PAWS compensation;
 - biodiversity net gain requirements for the wider site; and
 - mitigation, compensation, restoration or management already required under other planning permissions at Hermitage Quarry.
- The application shall include a ‘compensation accounting schedule’ showing the baseline habitats, the habitats to be lost, the compensation habitats to be created, restored or managed, the timing of delivery, the relevant legal mechanism, and how any existing habitat management commitments have been taken into account.
- Where the Compensation Strategy relies on land outside the applicant’s ownership or control, the application shall identify the land, baseline habitat condition, proposed works, ecological rationale, relationship to existing woodland and ecological networks, delivery body, funding arrangements, timing and long-term management mechanism. Planning permission will only be granted if the necessary land and management commitments are secured through planning condition, planning obligation or another legally enforceable mechanism.
- The Compensation Strategy shall include implementation triggers to ensure that compensation, receptor habitats and species mitigation are delivered in advance of, or in phase with, the loss of ancient woodland (PAWS) and any veteran or ancient trees. No clearance of ancient woodland (PAWS) shall take

place until the relevant soil handling, translocation, receptor site, species mitigation and compensation measures have been approved.

- The strategy shall be accompanied by long-term management, monitoring and adaptive management arrangements, including measurable success criteria for woodland establishment, soil function, habitat condition, protected and notable species use and ecological connectivity. These arrangements shall include annual monitoring, reporting to the Mineral Planning Authority, remedial measures where targets are not being met, and secured funding and responsibility for long-term delivery. The management period shall be sufficient to secure the establishment and functioning of the compensation habitats and shall be no shorter than any period required for biodiversity net gain habitat commitments.
- Requirements for Biodiversity Net Gain do not apply to the loss of PAWS or any veteran or ancient trees, which must be addressed separately by a suitable compensation strategy.

Biodiversity (other than PAWS), SSSI and geodiversity

- Any proposal shall be accompanied by a detailed ecological appraisal and all necessary species and habitat surveys.
- Development shall demonstrate that there would be no unacceptable direct or indirect adverse impacts, including from blasting, on:
 - Oaken Wood SSSI;
 - Oaken Wood, Barming Local Wildlife Site (LWS);
 - priority habitats;
 - protected and notable species; and
 - ecological connectivity across and beyond the site.
- No extraction shall encroach into the SSSI and suitable stand-offs and protective measures shall be secured to preserve its features and avoid indirect impacts. The sequence of working shall preserve woodland connectivity as far as possible throughout the operational period.
- A phased ecological mitigation, compensation and habitat establishment strategy shall be agreed, including advance habitat creation where appropriate so that species are not left without replacement habitat during working.
- Biodiversity net gain measures shall be clearly identified separately from measures intended to address irreplaceable habitat impacts.
- Any proposal should demonstrate how it contributes to, or at least is consistent with, the Kent Local Nature Recovery Strategy.
- Where necessary and possible, translocation of important species should take place.

Tree Preservation Order

- All trees protected by a Tree Preservation Order (TPO) that would be affected by the proposed development shall be identified with an explanation for the reasons for the TPO. The application shall demonstrate how harm to protected trees, in relation to the objectives of the TPO, has been avoided or

minimised through the site layout, working area, access arrangements, stand-offs, soil handling, screening and restoration proposals.

- Where works to trees protected by a Tree Preservation Order are demonstrated to be necessary, the application shall justify the extent of those works and include appropriate mitigation, replacement planting, woodland restoration and long-term management to be secured by planning condition and/or legal agreement.

Transport and Access

- All quarry traffic to utilise the existing and approved access for Hermitage Quarry onto Hermitage Lane (B2246).
- HGV routing shall continue to be via the north, unless alternative arrangements are expressly justified, having regard to existing weight restrictions south of the site access.
- A detailed Transport Assessment shall be submitted in accordance with KMWLP Policy DM13 and prevailing national guidance, including assessment of:
 - M20 Junction 5 and the Strategic Road Network;
 - Hermitage Lane and the A20/A26 corridor;
 - the Aylesford AQMA and M20 AQMA (and other AQMAs subsequently designated);
 - cumulative effects with existing and proposed (including allocated in Local Plans) residential and other development in the area; and
 - highway safety, capacity and amenity impacts.
- HGV movements associated with the site should not exceed the lawfully permitted movement levels for the existing site unless it is demonstrated that any increase would not give rise to unacceptable adverse impacts (see KMWLP policy DM13).
- Provision shall be made for ongoing traffic monitoring and review, with trigger mechanisms for additional mitigation if unacceptable adverse impacts arise.
- The Transport Assessment should consider impacts on the Aylesford Air Quality Management Area (AQMA) and the M20 AQMA and show how any potential adverse impacts on these AQMAs would be mitigated.

Public rights of way and access

- Public Rights of Way (PROWs) crossing or adjoining the site, including MR108, shall remain open where safe and practicable for as long as possible during the life of the development.
- Any temporary or permanent diversions shall:
 - Maintain the overall connectivity of the surrounding PROW network;
 - be safe and convenient for all users, including equestrians where relevant;
 - avoid unnecessary severance or lengthy diversion;
 - be provided in advance of closure; and
 - be appropriately screened from quarry operations.

- The development should consider opportunities for appropriate permissive access and restoration phase public amenity improvements, where these are compatible with protection of the natural environment and safe quarry operation.

Water environment, flood risk and groundwater

- Detailed Flood Risk Assessment and Hydrogeological Risk Assessment should be prepared.
- Notwithstanding the requirements of policy within the KMWLP, it shall be demonstrated that development would not give rise to unacceptable adverse impacts on:
 - Groundwater quality, levels and flow;
 - the principal aquifer and Source Protection Zone;
 - nearby abstractions;
 - groundwater dependent receptors; and
 - the wider hydrological and hydrogeological regime;
- Working depths shall be controlled so as not to encroach unacceptably on the groundwater table, with monitoring and review arrangements equivalent to, or more stringent than, those applying to existing operations where necessary;
- No dewatering, physical disturbance of the aquifer, interception of groundwater flow, or restoration scheme affecting groundwater shall take place unless it is demonstrated that equivalent protection would be secured for water resources and dependent environments;
- If restoration involves importation of material, only wholly clean and inert materials shall be used unless robust evidence demonstrates that no unacceptable groundwater risk would arise and appropriate authorisation has been received from the Environment Agency;
- A groundwater and water quality monitoring scheme, including trigger levels and remedial actions, shall be agreed before development commences.

Health and Amenity

- Development shall comply with KMWLP Policy DM11 and demonstrate that there would be no unacceptable adverse impacts on the health, quality of life and amenity of nearby communities and land uses.
- Any application shall be accompanied by detailed assessments (including appropriate mitigation) of:
 - lighting;
 - noise;
 - air quality including dust;
 - vibration and blasting; and
 - cumulative amenity effects arising from the proposal in combination with existing quarry operations and surrounding development.Any assessment should follow best practice and any national Government guidance (e.g. Planning Practice Guidance).

Air quality and dust

- A full mineral dust assessment shall be undertaken and submitted, supported by robust baseline monitoring, which includes consideration of the potential for health and amenity impacts at nearby receptors.
- A Dust Management Plan shall be submitted for the expanded site area following best practice and including, as appropriate:
 - permanent air quality and meteorological monitoring;
 - dust deposition/flux monitoring and PM10 and PM2.5 monitoring;
 - source apportionment where required;
 - weather responsive management of activities likely to result in production of dust;
 - paved haul roads where practicable;
 - enclosure or sheltering of crushing, screening and transfer operations;
 - damping down of stockpiles and exposed surfaces;
 - screening, storage and handling controls for dusty materials;
 - management of spillages and conveyors; and
 - regular review of controls, including as the working area moves closer to receptors.
- The layout and phasing of development should maintain appropriate separation between dust-generating activities and sensitive receptors, informed by detailed mineral dust assessment and site-specific mitigation.
- The application shall demonstrate that there would be no unacceptable adverse effect on the Aylesford AQMA, the M20 AQMA, or local amenity.

Blasting, vibration and structural protection

- A detailed blast and vibration assessment shall be submitted, informed by site-specific design, topography, separation distances and existing consent conditions.
- Blasting operations shall be controlled through agreed vibration limits, operating procedures, monitoring and reporting.
- Independent blast monitoring at agreed sensitive receptors shall be required.
- Provision should be made for pre-commencement structural surveys of nearby properties where justified, together with a clear protocol for investigation and response if vibration-related complaints arise.

Landscape and visual impact

- A detailed landscape and visual assessment shall be submitted.
- Any proposal shall be supported by a detailed Landscape and Visual Impact Assessment and landscape mitigation strategy. The strategy shall demonstrate how significant adverse visual effects on nearby residential receptors and users of Public Rights of Way would be avoided or minimised through:
 - Retention and long-term maintenance of woodland buffers where appropriate but particularly to the south and east of the site;
 - advance planting;
 - bunding;

- careful phasing of extraction and restoration;
 - minimisation of unnecessary woodland loss; and
 - progressive restoration.
- Particular attention shall be paid to receptors close to the site boundary, including nearby residents and PROW users, and to the potential cumulative landscape effects of an enlarged quarry footprint.
- Proposals shall assess effects on the character of Oaken Wood / Mereworth Woodlands and on the setting of the Kent Downs National Landscape.

Historic environment

- There are Historic Environment Records (HER) within and in close proximity to the potential site as well as potential for significant remains.
- Notwithstanding the requirements of KMWLP Policies DM5 and DM6, any application shall be accompanied by:
 - A heritage impact assessment;
 - an archaeological desk-based assessment;
 - field evaluation where necessary;
 - geoarchaeological and Palaeolithic assessment where relevant; and
 - proposals for preservation in situ or appropriate excavation, recording and conservation.
- The impact of proposals on nearby listed buildings and their settings shall be fully assessed and mitigated as necessary.
- Provision shall be made for archaeological monitoring during soil stripping and extraction where required.
- Any application should demonstrate how the continued availability of Kentish Ragstone for use as building and dimension stone will be secured. Proposals should provide for a supply of building/dimension stone at least equivalent to that secured under the existing Hermitage Quarry permissions, including provision for annual sales, stockholding, on-site cutting/processing capability and annual reporting to the Mineral Planning Authority. The detailed arrangements should be set out in a Building/Dimension Stone Supply Strategy and secured by planning condition and/or legal agreement.

Utilities and land stability

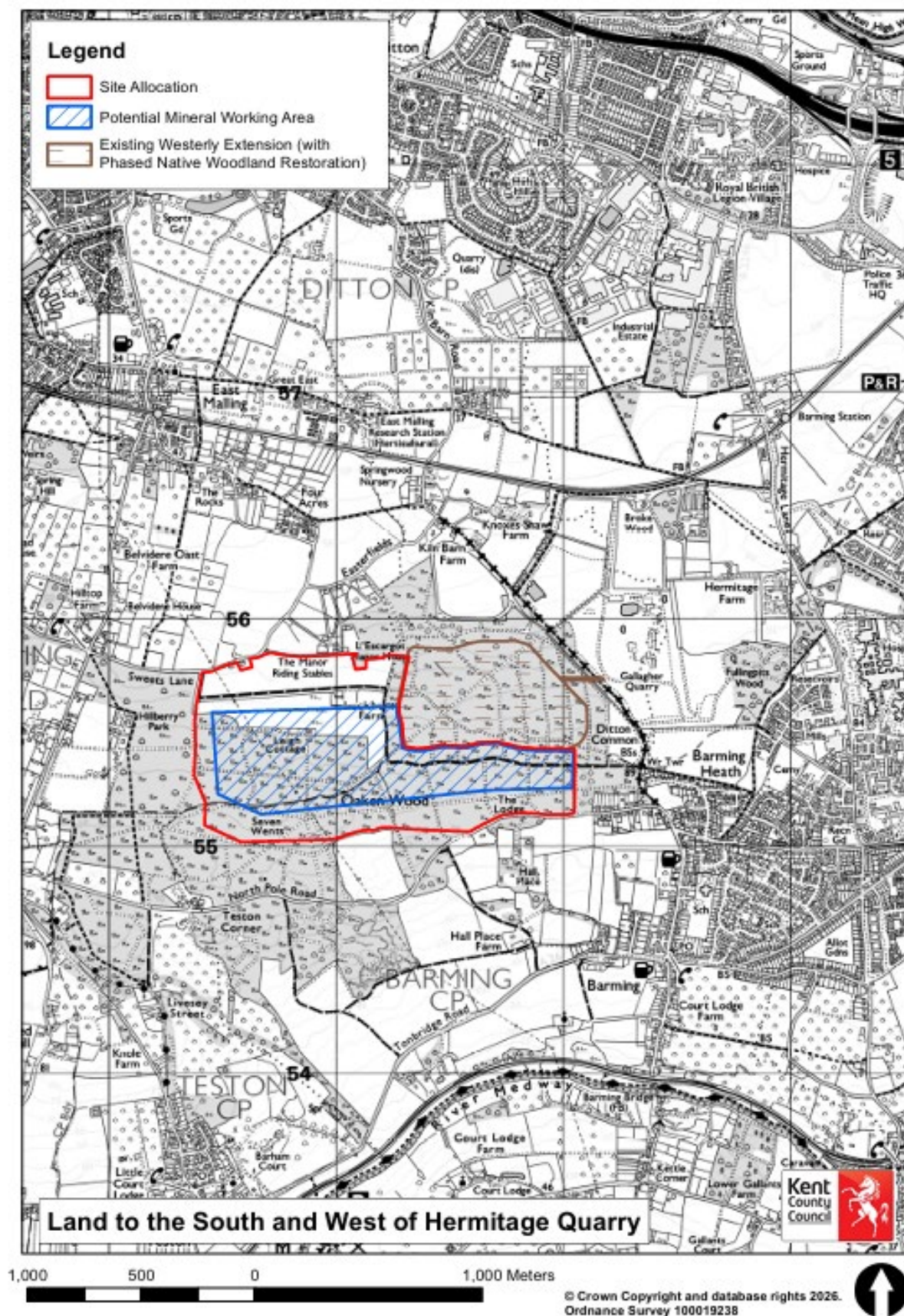
- Full assessment shall be undertaken of the overhead power line and associated infrastructure within the site, including stand-offs, retention, diversion or undergrounding, in consultation with the utility provider.
- Any proposal shall demonstrate that no unacceptable adverse impacts would arise for utilities, pylons, services, drainage or neighbouring land from land instability caused by the development.

Agricultural land

- A detailed soils and Agricultural Land Classification assessment shall be undertaken to inform site design and restoration. This is particularly important given the presence of grade 2 agricultural land in the northern part of the site.
- Agricultural soils shall be stripped, stored, handled and reused separately in accordance with an approved soil management plan.
- The restoration strategy shall clearly identify where agricultural restoration is proposed, where woodland/meadow restoration is proposed, and how the handling of soil resources would support the agreed after-use.
- A Soil Resource Plan (as recommended by DEFRA and Natural England) should be prepared.

Restoration, aftercare and long-term management

- Restoration shall be progressive and shall be tied to the approved phasing scheme. This should show how worked areas are restored soon after completion and without avoidable delay.
- Detailed restoration and aftercare proposals shall demonstrate how the site would be restored to a high-quality landform and after-use, including native woodland and meadow habitats and, where appropriate, public access enhancements compatible with ecological objectives.
- The restoration scheme shall include:
 - landform design;
 - soil replacement;
 - woodland and meadow establishment;
 - management requirements;
 - aftercare arrangements;
 - ecological monitoring;
 - access and PROW arrangements (including reinstatement of PROW where appropriate and feasible);
 - groundwater and hydrology safeguards; and,
 - annual review and adaptive management mechanisms.
- Long-term management periods should reflect the time needed for successful woodland establishment and delivery of ecological and landscape objectives.
- Where restoration involves imported materials or waste, proposals must demonstrate compliance with KMWLP Policies DM10, DM19, CSW9 and/or CSW11 as appropriate.





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Kent Minerals and Waste Local Plan



Kent Minerals and Waste Local Development Scheme

July 2026



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Glossary of Terms/Abbreviations Used in the Text

Abbreviation	Explanation
Annual Monitoring Report (AMR)	A statutory document (referred to in legislation ¹ as the 'Authority Monitoring Report') which monitors the progress of preparation of planning documentation against the Development Scheme milestones as well as progress in meeting the objectives and implementing the policies set out in the Kent Minerals and Waste Local Plan 2024-39.
Biodiversity net gain (BNG)	Biodiversity net gain is an approach to development which means that habitats for wildlife must be left in a measurably better state than they were in before development took place.
Gateway 1 self-assessment summary	The document required under the new plan-making system which formally starts preparation of a new local plan or minerals and waste plan and sets out the authority's readiness for plan preparation.
Kent Minerals and Waste Development Plan	The Kent Minerals and Waste Development Plan comprises the development plan documents that provide planning policy for minerals and waste development in Kent, currently this is the Kent Minerals and Waste Local Plan 2024-39 and the Kent Mineral Sites Plan 2020 (until replaced).
Kent Minerals and Waste Local Development Scheme (MWLDS)	This document. It explains the programme for preparing minerals and waste planning policy and associated guidance in Kent during the transition from the legacy plan making system to the new system.
Kent Minerals and Waste Local Plan 2024-39 (KMWLP)	This adopted plan (March 2025) sets out the County Council's vision, objectives & spatial strategy for Minerals and Waste planning matters. It contains a statement of strategy and a set of primary policies and proposals for delivering the Core Strategy and sets the policy framework for the allocation of mineral sites and development management decisions. The KMWLP replaced the KMWLP 2013-30 that had been modified via an Early Partial Review (EPR) in 2020.

¹ Section 35 of the Planning and Compulsory Purchase Act 2004 (as amended)

Kent Mineral Sites Plan 2020	This adopted plan (September 2020) allocates sites in Kent that are considered suitable for mineral working, subject to planning permission.
Kent Mineral Sites Plan 2026	The plan currently being prepared to replace the Kent Minerals Sites Plan 2020.
Kent Development Plan	The portfolio of documents that together provide the policy framework for all forms of development in Kent. It currently includes the Kent Minerals and Waste Local Plan 2024-39, the Kent Mineral Sites Plan, as well as Local Plans produced by the Kent Borough and District Councils and adopted Neighbourhood Plans.
Kent Minerals and Waste Local Development Scheme (MWLDS)	The Kent Minerals and Waste Local Development Scheme is this document. The MWLDS includes a project plan setting out the County Council's programme and timetable for updating planning policy for waste and minerals development in Kent as well as associated Supplementary Planning Documents.
Local plan timetable / minerals and waste plan timetable	The timetable required under the new plan-making system. It will replace the Local Development Scheme that sets out the timetable local plans and minerals and waste plans prepared under the legacy plan making system.
Notice of intention to commence plan making	The notice that must be published under the new plan making system at least four months before Gateway 1. It gives advance notice that plan making is to begin.
The Planning Inspectorate (PINS)	The Government agency responsible for programming and conducting the Independent Examination of Local Plans and for managing appeals on planning applications.
Statement of Community Involvement (SCI)	The SCI sets out the Council's policy for involving the community and other stakeholders in the preparation and revision of the Kent Minerals and Waste Development Plan and in the development management process. The SCI is not a Local Plan. A separate SCI is not required for local plans prepared under the new plan making system.
Strategic Environmental Assessment (SEA) & Sustainability Appraisal (SA)	A formal process that analyses and evaluates the social, economic and environmental effects of a plan or programme.

Supplementary Planning Document (SPD)	A document produced by the County Council that provides guidance on the implementation of policies in the Kent MWLP, for example in relation to minerals and waste safeguarding. Under changes to the plan making system new SPDs can only be adopted up to 30 June 2026.
Supplementary plan	A new type of statutory plan prepared under the 2026 plan making system. Supplementary plans form part of the development plan and may be used where additional statutory policy detail including that concerning specific allocations is justified.

1. Introduction

- 1.0.1** Kent County Council, as the minerals and waste planning authority for the County Council's administrative area, must prepare and keep under review a Minerals and Waste Local Development Scheme (MWLDS). The MWLDS sets out a timetable for the production of an updated Kent Minerals Sites Plan and guidance relating to the implementation of policies concerning Biodiversity Net Gain and the Circular Economy. Updates to other key planning documents related to minerals and waste planning policy in Kent will be undertaken in accordance with the new plan making system (see below) and a timetable for their production will be published in due course. This July 2026 MWLDS covers the period 2024-26 and replaces the previous September 2024 Scheme.
- 1.0.2** The County Council is committed to the new programme for the Kent Mineral Sites Plan and the guidance set out in this MWLDS. Its progress will be reviewed annually and reported through the Annual Monitoring Report. Depending on progress this scheme will be updated to reflect changes to timetables.
- 1.0.3** This MWLDS reflects the County Council's priorities and enables the work programme to be set for preparation of the Kent Mineral Sites Plan and Biodiversity Net Gain and the Circular Economy guidance. The MWLDS also informs the public and stakeholders of the programme currently anticipated for updating the Kent Mineral Sites Plan and preparing the guidance.

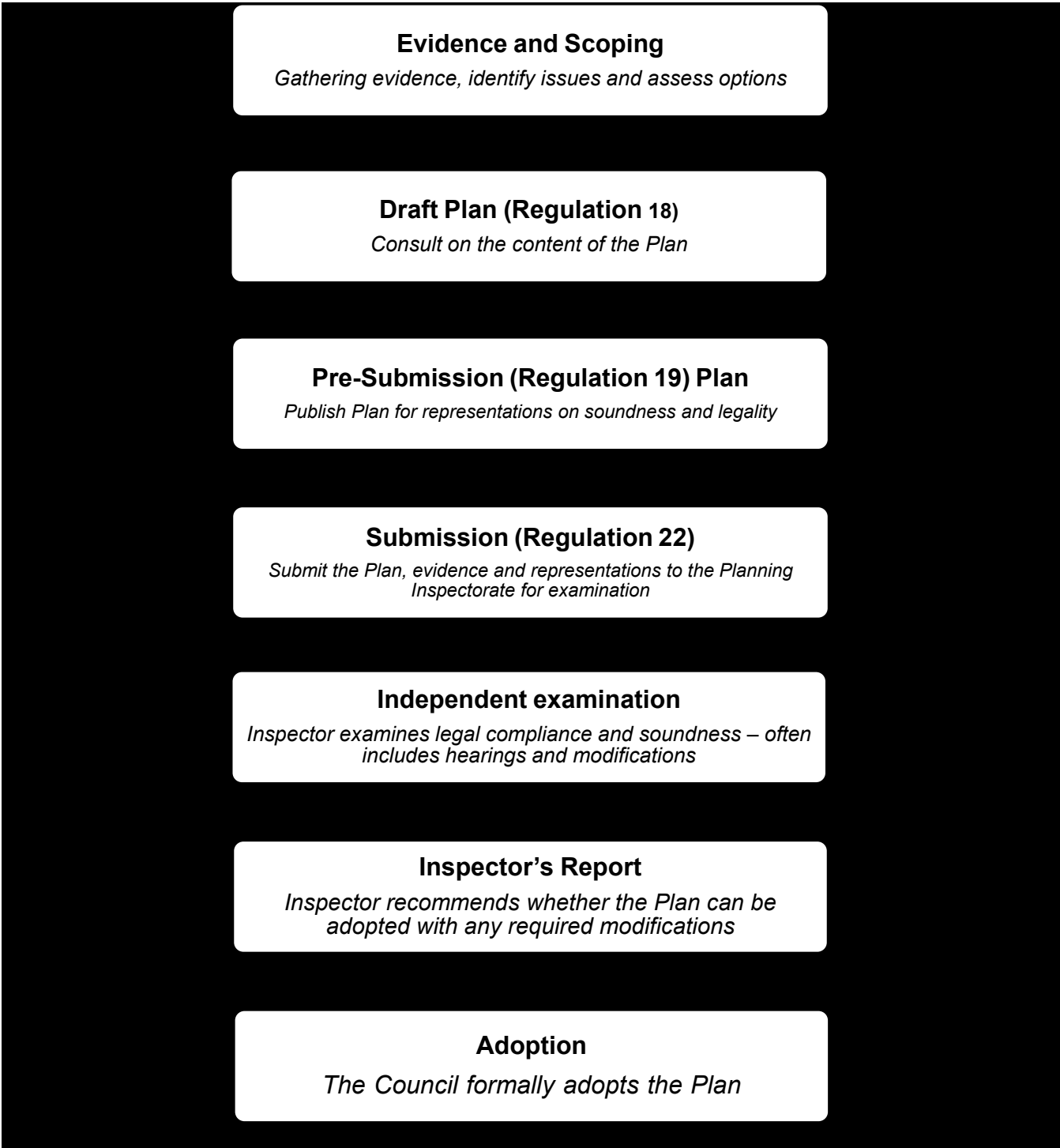
1.1 Legislative Context and Background

- 1.1.1** The new local plan making system came into force on 25 March 2026. The new system introduces a standard 30 month plan-making process, gateway stages, a stronger 'digital first' approach and a requirement to begin formal preparation of replacement plans within five years of adoption of the previous plan.
- 1.1.2** For plans prepared under the new system, the former Local Development Scheme is replaced by a local plan timetable or minerals and waste plan timetable. Formal plan making begins with publication of a Gateway 1 self-assessment summary, which must be preceded by a notice of intention to commence plan-making.
- 1.1.3** The Kent Mineral Sites Plan currently being updated can continue to be prepared under the legacy system in the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012, provided it is submitted for independent examination by 31 December 2026. Figure 1 below outlines the process for preparing a Local Plan under the legacy system.
- 1.1.4** The Kent Minerals and Waste Local Plan 2024-39 was adopted in March 2025. As it was adopted under the legacy system, formal work on its replacement will need to commence under the new system by no later than 2030. In practice this means publication of a notice of intention to commence plan-making by November 2029 and publication of the Gateway 1 self-assessment by March 2030 at the latest.
- 1.1.5** Supplementary Planning Documents (SPDs) do not continue as part of the new system. Existing SPDs remain in force until the policy framework to which they relate

has been updated, but new SPDs can only be adopted up to 30 June 2026. Under the new system any additional statutory policy detail would need to be prepared through a supplementary plan. Non-statutory guidance may also be prepared where appropriate.

- 1.1.6** The statutory Duty to Co-operate has been revoked. Strategic engagement on cross-boundary minerals and waste matters nevertheless remains important and will continue as part of plan preparation, evidence gathering and wider liaison with relevant authorities and prescribed bodies.

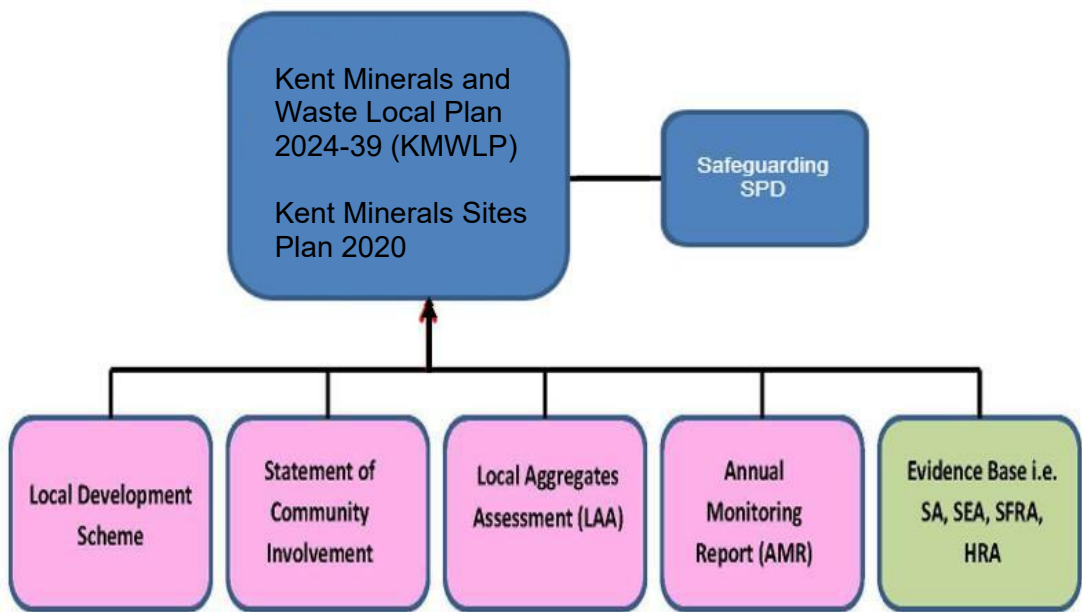
Figure 1 – Outline of Local Plan Process Under the Legacy System



1.2 The Minerals and Waste Local Development Scheme

- 1.2.1 Figure 2 below shows the relationship between the minerals and waste plans and supporting documents that currently form and underpin the adopted minerals and waste planning policy in Kent.
- 1.2.2 The Annual Monitoring Report² and the Local Aggregates Assessment are prepared on an annual basis and monitor performance (e.g. how development has actually come forward) against Plan objectives. These monitoring documents, as well as other survey work, help inform reviews of the adopted Plans and indicate whether changes might be required.
- 1.2.3 The Annual Monitoring Report and the annual Local Aggregate Assessment also inform decision makers of changes, such as aggregate landbank levels, that may be material to the determination of planning applications and appeals, and would need to be taken into account as well as the policies of the adopted Plans.
- 1.2.4 Appendix A includes an outline programme for planning policy activity covered by this Scheme (i.e. that undertaken under the legacy plan making system) to February 2028.

Figure 2 - Relationship between current adopted Minerals and Waste Local Plan Documents



² The Annual Monitoring Report is produced to meet the Council’s statutory requirement to produce an ‘Authority Monitoring Report’ at least every 12 months.

2. Minerals and Waste Local Plans

2.0.1 The following describes the main Kent Minerals and Waste Local Plan documents.

2.1 Kent Minerals and Waste Local Plan 2024 – 2039

2.1.1 The Kent Minerals and Waste Local Plan 2024-39 was adopted in March 2025 (replacing the Kent Minerals and Waste Local Plan 2013-30 (as amended by the Early Partial Review)) and is the current strategic document which sets out the vision and delivery strategy for mineral provision and waste management in Kent. The Plan is formed of core strategic policies and a monitoring implementation framework, as well as development management policies against which any proposals for minerals and waste development will be assessed. The Plan makes provision for the ensuring of a ready and sustainable supply of minerals to meet construction and industrial requirements as well as the sustainable management of all wastes in Kent which includes supporting the principles of the UK Government's waste hierarchy.

2.1.2 The adopted KMWLP 2024-39 identifies the need for additional hard rock provision over the plan period. That strategic requirement is the main reason why the County Council is now taking forward a replacement Kent Mineral Sites Plan.

2.1.3 Because the KMWLP 2024-39 was prepared under the legacy system, the new system now requires the County Council to begin formal preparation of a replacement plan within five years of adoption. The indicative commencement milestones are set out below. A more detailed timetable for replacing the adopted KMWLP under the new system will be published nearer the time work on the update is to commence.

Replacement KMWLP milestone	Indicative latest date
Adoption of current KMWLP	March 2025 (complete)
Notice of intention to commence replacement plan-making	By November 2029
Gateway 1 self-assessment / formal commencement of new-style plan-making	By March 2030

2.2 Kent Mineral Sites Plan

2.2.1 The current adopted Kent Mineral Sites Plan identifies mineral sites and locations for mineral extraction, processing and importation that reflect the principles and strategy of the Minerals and Waste Local Plan 2013 - 2030. The minerals covered in the document are soft sand (building sand) and sharp sand and gravels. The sites allocated are:

- Chapel Farm, Lenham (soft sand)
- Extension to Stonecastle Farm, Hadlow/Whetsted (sharp sand and gravels)
- Moat Farm, Capel (sharp sand and gravels)

2.2.2 The Kent Mineral Sites Plan was adopted by the County Council on 10 September 2020. The 2020 Mineral Sites Plan replaces any sites allocated in the following previously adopted Plans:

- 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)

2.2.3 As mentioned above, in light of the preparation of the updated Core Strategy policy to cover the period 2024 to 2039, there is now a need to investigate whether the Mineral Sites Plan can be updated to ensure sufficient sites are allocated to meet requirements for land won hard rock over this extended period.

2.2.4 The revised timetable for work relating to the Mineral Sites Plan is set out below. The changes to the September 2024 MWLDS relate to the extent of the detailed technical assessment undertaken on a site nominated for allocation and the need for work to pause to allow resources to be focussed on the independent examination and adoption of the Minerals and Waste Local Plan. If the nominated site is considered suitable for hard rock extraction, it is now anticipated that adoption would take place in February 2028.

2.2.5 The replacement Kent Mineral Sites Plan must be submitted by 31 December 2026 if it is to continue under the legacy system. If that deadline were missed, the County Council would need to consider how site allocations should be taken forward under the new system.

Update of the Kent Mineral Sites Plan - Timetable for Key Stages

Stages	Dates
<i>Call for Sites</i>	<i>October - November 2022 (completed)</i>
<i>Consultation on a Site Nominated for Hard Rock (Regulation 18)</i>	<i>June - July 2023 (completed)</i>
<i>Second Call for Sites</i>	<i>August - October 2023 (completed)</i>

Publication of draft updated Minerals Sites Plan for representations on soundness (Regulation 19 (Pre-Submission Draft))	July - September 2026
Submission to Secretary of State for Examination	December 2026
Independent Examination Hearings	June 2027
Inspector's Report	November 2027
Adoption	February 2028

2.3 Adopted Policies Maps

2.3.1 The Adopted Policies Maps illustrate the mineral and waste policies on an Ordnance Survey base. The County Council's policies maps including the mineral safeguarding areas and allocations should be included as part of the Local Plans maintained and adopted by borough/district planning authorities. The borough/district council policies maps should be updated and amended whenever a new or revised Minerals and Waste Plan is adopted.

2.4 Arrangements for the preparation of the Kent Mineral Sites Plan and future minerals and waste plan making

2.4.1 Arrangements for the preparation of the Kent Minerals and Waste Local Plan 2024-39 and updates to the Kent Mineral Sites Plan are set out in the table below.

Organisational Lead	Minerals and Waste Planning Policy Team, Growth, Environment and Transport, Kent County Council
Political Management	Decision making by Cabinet Member responsible for Minerals and Waste Local Plan matters, relevant Cabinet Committee and Full Council as appropriate.
Resources Required	Existing staff resources supplemented where required by specialist consultancy support
Community & Stakeholder Involvement	For the replacement Kent Mineral Sites Plan prepared under the legacy system, consultation will continue in accordance with the 2012 Regulations and the Kent Statement of Community Involvement 2021. For new-style plan-making, engagement will be governed by the 2026 Regulations including the notice of intention to commence plan-making, scoping consultation, consultation summaries, Gateway 1, mandatory consultation stages and notification requirements.

3. Key Supporting Documents and Evidence Base

3.1 Annual Monitoring Report and Local Aggregates Assessment

- 3.1.1** Plan preparation progress and the implementation and effectiveness of adopted plan policies is, and will be, reviewed annually through the Annual Monitoring Report (AMR). Monitoring will indicate what, if any changes, need to be made and these will be incorporated into subsequent reviews of the adopted policies.
- 3.1.2** In addition, the National Planning Policy Framework states that Mineral Planning Authorities should plan for a steady and adequate supply of aggregates by preparing an annual Local Aggregate Assessment (LAA) based on:
- A rolling average of 10 years sales data and other relevant local information; and,
 - an assessment of all of the supply options (including marine dredged, secondary and recycled sources).
- 3.1.3** The AMR and LAA are published annually on the County Council's website³.

3.2 Community Participation and Consultation Requirements

- 3.2.1** The Government has set minimum standards for consultation during plan preparation prior to submission for examination⁴. It is crucial that all interested parties, including local communities, the minerals and waste industry and environmental groups are involved in the preparation of planning documents.
- 3.2.2** For the replacement Kent Mineral Sites Plan proceeding under the legacy system, community involvement will continue to be carried out in accordance with the Kent Statement of Community Involvement 2021 and the 2012 Regulations. The SCI sets the standards and opportunities for community involvement in the preparation and review of the Local Plan documents as well as involvement in planning applications that the County Council determines⁵.
- 3.2.3** Under the new plan making system a separate Statement of Community Involvement is no longer required. Instead, consultation and notification requirements are embedded directly in the new legislation and regulations. When the County Council begins preparation of a replacement minerals and waste plan under the new system it will be required to:
- publish a notice of intention to commence plan-making at least four months before Gateway 1;
 - prepare and maintain a minerals and waste plan timetable in a plain English and searchable digital format;

³ Available from: [Monitoring and assessment - Kent County Council](#)

⁴ See The Town and Country Planning (Local Planning) (England) Regulations 2012

⁵ The Statement of Community Involvement can be viewed at: [Statement-of-Community-Involvement.pdf \(kent.gov.uk\)](#)

- undertake a scoping consultation on what the plan should contain and how future engagement should be carried out;
- publish summaries of consultation at the required stages of the process;
- consult on proposed plan content and evidence before Gateway 2;
- consult on the proposed plan and supporting submission documents before Gateway 3; and,
- notify prescribed bodies and any persons who have opted in to receive notifications at the key statutory stages, including gateway outputs, examination and adoption.

3.3 Minerals and Waste Safeguarding Supplementary Planning Document

- 3.3.1** The County Council adopted an updated Minerals and Waste Safeguarding Supplementary Planning Document (SPD) in March 2021. That document continues to provide guidance on the implementation of safeguarding policies in the adopted KMWLP 2024-39.
- 3.3.2** The purpose of the SPD is to provide guidance on the implementation of policies in the adopted Kent MWLP in relation to minerals and waste safeguarding matters; it does not introduce new policy. The adopted policies on safeguarding prevent the unnecessary sterilisation of the mineral resources in Kent deemed of economic importance by the British Geological Survey (BGS). The Plan also safeguards minerals and waste importation and processing infrastructure (wharves, railheads and the production of secondary and recycled mineral substitute products and waste management infrastructure).
- 3.3.3** Similarly, the policies ensure that the existing minerals and waste management infrastructure in Kent is not lost to, or its use compromised by, the inappropriate proximity of non-mineral or waste developments that, by their nature, may be incompatible with their continued operation. An example could be housing development within close proximity to an existing operationally unrestricted mineral wharf.
- 3.3.4** The SPD was updated to reflect updates to the mineral and waste safeguarding policies made by the Early Partial Review of the Kent Minerals and Waste Local Plan 2013-2030, and to provide further guidance on their application.
- 3.3.5** The existing Safeguarding SPD will remain in force unless and until replaced. No further SPD is proposed through this Scheme. If additional statutory policy detail is needed in future, the Council will consider whether that should be addressed through a supplementary plan under the new system or through non statutory guidance.

3.4 Guidance related to Biodiversity Net Gain

- 3.4.1** The Environment Act 2021 introduces a statutory requirement for new development to achieve 'biodiversity net gain' (BNG). This new requirement is reflected in the updated Kent Minerals and Waste Local Plan 2024-39. As this is such a complex area, especially when applied to the restoration of mineral workings, the September 2024 Scheme envisaged preparation of a Biodiversity Net Gain SPD. In light of the new

system, that approach has been superseded and the County Council now intends to prepare Biodiversity Net Gain guidance rather than an SPD. The purpose of the guidance will be to assist applicants, consultees and decision-makers in applying the adopted KMWLP policies to minerals and waste development, including restoration proposals and the particular complexities associated with net gain in worked-out mineral sites.

3.4.2 As non-statutory guidance, this document will not form part of the development plan. Its purpose will be to explain and support the implementation of adopted policy rather than introduce new policy requirements.

3.4.3 An outline timetable for preparation of the Biodiversity Net Gain guidance is included below. The timetable has been adjusted to reflect the need for resources to be focussed on ensuring the Kent Minerals Sites Plan is submitted by December 2026.

Biodiversity Net Gain Guidance - Timetable for Key Stages

Stages	Dates
Text of Draft BNG Guidance	August – October 2026
Consultation and engagement on draft guidance	November 2026 – January 2027
Analysis of consultation feedback with recommendations for changes to BNG guidance	February 2027
Update guidance to prepare final for adoption	March - April 2027
Adoption	May 2027

3.5 Circular Economy Guidance

3.5.1 It remains the County Council's intention to prepare Circular Economy Guidance. This is intended to support implementation of the adopted KMWLP 2024-39, particularly in relation to waste prevention, re-use, resource efficiency and the transition to a more circular economy.

3.5.2 The scope and format of the guidance is to be determined but consultation on draft guidance will be undertaken before final 'adoption' and publication. An outline timetable for preparation of the Circular Economy guidance is included below.

Circular Economy Guidance - Timetable for Key Stages

Stages	Dates
Text of Draft Circular Economy Guidance	August 2026
Consultation and engagement on draft guidance	September 2026 – November 2026
Analysis of consultation feedback with recommendations for changes to BNG guidance	December 2026
Update guidance to prepare final for adoption	January - February 2027
Adoption	March 2027

3.6 Sustainability Appraisal and Strategic Environmental Assessment

- 3.6.1** The preparation of the Kent Mineral Sites Plan is subject to appraisal and testing through Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA). SEA is a systematic process of identifying and addressing the environmental consequences of plans and programmes originally required by European Union directive that is in force in UK environmental law. The testing will identify any likely significant environmental effects resulting from the implementation of an updated Sites Plan.
- 3.6.2** An SA Scoping Report for the Mineral Sites Plan work was published alongside the Call for Sites and a further SA was published to support the draft updated Minerals Sites Plan that included details of the nominated site for hard rock in June/July 2023. The Scoping Report sets out the scope of the SA process and is used to consult the views of the three statutory consultees on that scope, namely the Environment Agency, Natural England and Historic England. An updated SA of the Kent Minerals Sites Plan, which took account of comments received on the draft SA published in 2023, would be published to accompany any publication of a Pre-Submission Draft Kent Minerals Sites Plan.
- ### 3.7 Appropriate Assessment under the Habitats Directive
- 3.7.1** The purpose of Appropriate Assessment (AA) is to assess the impacts of spatial plans, which includes Local Plans, against the nature conservation objectives of any 'Habitat site'⁶ and to ascertain whether they would adversely affect the integrity of that site. There are a number of Habitat Sites in Kent and the County Council will, as necessary, apply Appropriate Assessment to any proposed updates to policy.
- 3.7.2** An Appropriate Assessment of the updated policies in the KMWLP was prepared and published alongside the Pre-Submission Draft KMWLP 2024-2039 in early 2024.

⁶ European Sites are sites which are designated under The Conservation of Habitat and Species Regulations 2017 which in turn was amended under the Conservation of Habitat and Species (Amendment) (EU Exit) Regulations 2019).

4. Supporting Statement

4.1 Management and Resources

- 4.1.1** This scheme amends the September 2024 programme to reflect the current approach to preparation of the replacement Kent Mineral Sites Plan and the requirements of the new plan-making system.
- 4.1.2** The main priority over the short term is to complete the replacement Kent Mineral Sites Plan under the legacy system and secure its submission by 31 December 2026.
- 4.1.3** The transition to the new plan making system will require additional programme management, digital publication and consultation planning. The County Council will continue to review whether specialist support is required for evidence preparation, examination or project management.

4.2 Evidence Base

- 4.2.1** To create a sound evidence base for the preparation of the Kent Mineral Sites Plan, relevant surveys and monitoring information are needed.
- 4.2.2** The evidence base consists of indicators set out in the monitoring schedule of the current adopted KMWLP. Indicators are also included within the Data Monitoring chapter of the AMR which, in summary, includes the following:
- The production of aggregates
 - New mineral reserves
 - Landbanks
 - Safeguarding
 - Sales of construction aggregates at wharves and rail depots
 - Capacity of any new waste management facilities
 - Waste arisings including municipal waste
 - Exports and imports of waste
 - Exports and imports of minerals
 - Capacity for handling waste materials in Kent.
- 4.2.3** Other evidence base reports have been compiled associated with the assessment of the nominated site for hard rock for allocation in the Kent Mineral Sites Plan.

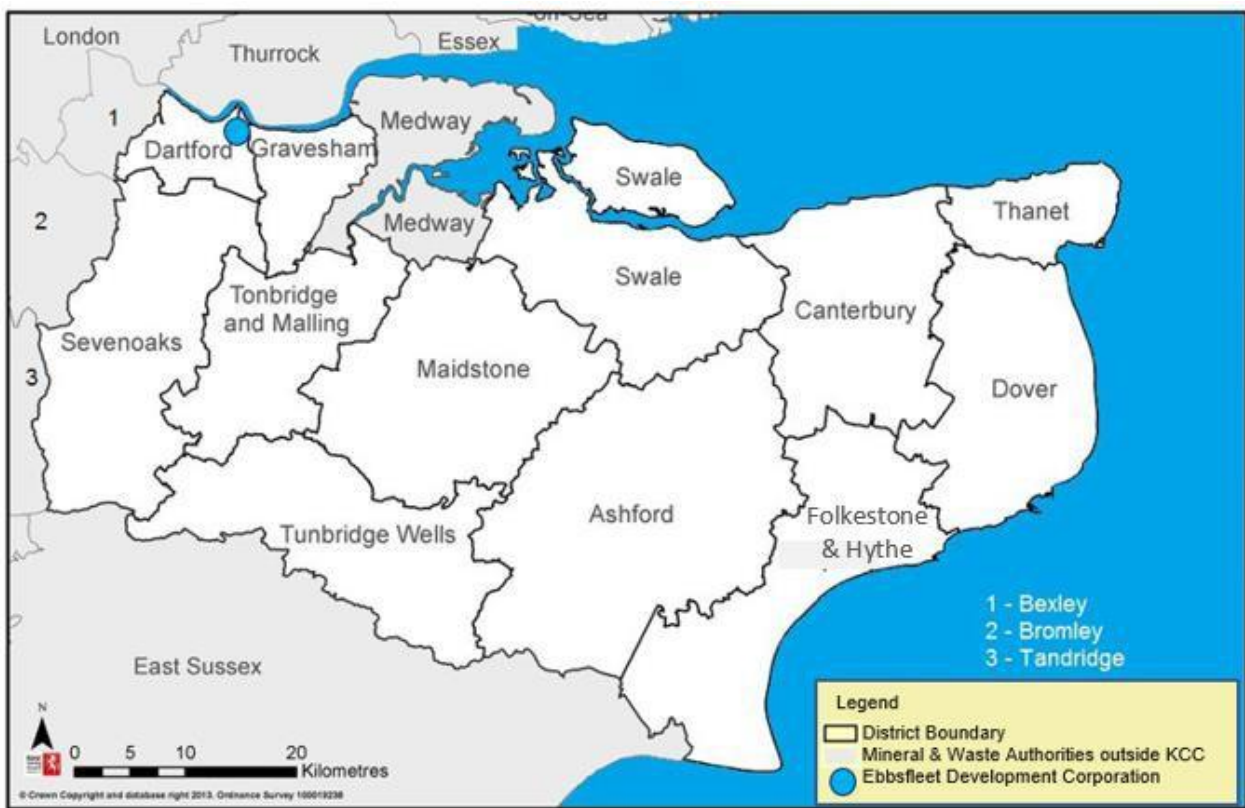
4.3 Strategic engagement and cooperation

- 4.3.1** The statutory 'Duty to Cooperate' no longer applies. However engagement with neighbouring authorities and other relevant organisations to maximise effectiveness in planning for strategic cross-boundary matters is still required.
- 4.3.2** Within the Kent area both Kent County Council and Medway Council are minerals and

waste planning authorities. It is recognised that the strategic nature of minerals and waste planning issues may not be confined within the respective areas of each authority. We will continue our commitment to joint working and sharing of evidence with Medway Council to ensure that there is both common understanding and consistency in the development and direction of policy for the individual local plans. To this end a Statement of Common Ground between Kent County Council and Medway Council that addresses these issues has been prepared and will be updated as necessary. Statements of Common Ground on mineral and waste planning matters have also been agreed with a number of neighbouring mineral and waste planning authorities and Kent Borough and District Councils.

4.3.3 The Annual Monitoring Report will continue to report on strategic engagement activity.

Figure 3 - Geographic area covered by Kent County Council



4.1 Risk Assessment

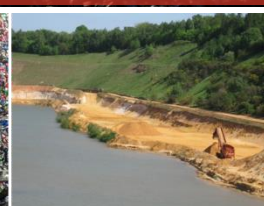
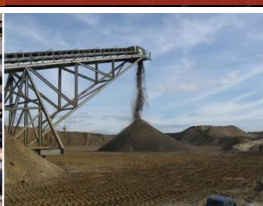
4.4.1 In preparing this Development Scheme, consideration has been given to potential risks that might impact on preparation of the Local Plan. These risks include:

- **Personnel** - Availability of experienced personnel.
- **Decision Making** - Political processes.
- **Soundness** - Working alongside key stakeholders to ensure the KMWLP is delivered in accordance with the appropriate regulations.

- **External Bodies** - The length of time it takes to receive responses from stakeholders and the nature of these responses.
- **Community Engagement** - Issues of concern and the scale of response may influence the programme.

Appendix A: Programme of Planning Policy Activity (legacy plan making system only)

Activity	July 2026	August 2026	September 2026	October 2026	November 2026	December 2026	January 2027	February 2027	March 2027	April 2027	May 2027	June 2027	July 2027	August 2027	September 2027	October 2027	November 2027	December 2027	January 2028	February 2028
Updated Kent Mineral Sites Plan																				
Detailed Technical Assessment																				
Publication of Preferred Sites (Regulation 19) for representations on soundness	Reg 19	Reg 19																		
Submission to Secretary of State						Submission														
Independent Examination Hearings												Hearings								
Inspector's Report (IR)																	IR			
Adoption																				ADOPTION
Annual Monitoring Report																				
Monitoring of all policies																				
Draft in light of annual waste data and LAA																				
Finalise taking account of monitoring of policies																				
Local Aggregates Assessment																				
Survey of operators inc. recycled aggregate producers																				
Update data (10yr av.; landbanks etc.) in light of survey																				
Update commentary in previous LAA based on revised data																				
Draft for SEEAWP																				
Consultation with SEEAWP																				
Prepare final draft in light of SEEAWP comments																				
Publish Final Draft																				
Biodiversity Net Gain Guidance																				
Text of Draft Revised Guidance																				
Consultation and engagement on draft Guidance (allow 3 months)																				
Analysis of consultation feedback with recommendations for changes																				
Update Guidance to prepare final for adoption																				
Adoption (inc. report writing)																				
Circular Economy Guidance																				
Text of Draft Revised Guidance																				
Consultation and engagement on draft Guidance (allow 3 months)																				
Analysis of consultation feedback with recommendations for changes																				
Update Guidance to prepare final for adoption																				
Adoption (inc. report writing)																				



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Appendix C: Consultation Statement – Review of comments received to Regulation 18 consultation on the review of the Mineral Sites Plan.

Issue Raised	Representor(s)	KCC Response
Hard Rock Nominated Site - Hermitage Quarry		
- Quarrying would cause irreversible loss of ancient woodland and stone resources. The site contains irreplaceable habitat protected under the national planning policy. Oaken Wood is identified as protected ancient woodland of national importance and supports diverse and protected species. - Cumulative impacts with other local development, including loss of amenity and increased traffic. - Request for a clearer, less technical explanation of the proposed development. - Rerouting of Public Rights of Way (PROW) would harm the local area's historic and landscape value. - Quarrying would generate airborne dust, posing health risks to nearby residents. - Loss of ancient woodland would exceed combined losses from HS2 and the Lower	Kent Residents (x175)	- This is recognised in the technical assessment. Part of the site is recognised as ancient woodland, being a Plantation on Ancient Woodland Site (PAWS). A PAWS site is where native trees were cleared and replaced by non-native plantations, in this case a sweet chestnut managed woodland, and is recognised as an irreplaceable habitat including the woodland features as undisturbed soil, ground flora and fungi. It is acknowledged that the development (quarrying for aggregate minerals) would result in the loss of PAWS. Any PAWS losses as a consequence of quarrying have to be justified by "wholly exceptional reasons", together with a suitable compensation strategy. The assessment of whether wholly exceptional reasons exist considers economic, social and environmental matters. This includes the need to plan for a steady and adequate supply of primary land-won aggregates to meet defined markets over the plan period and the socio-economic and environmental benefits that accrue from maintaining a local supply. The Council is satisfied that wholly exceptional reasons exist and a suitable compensation strategy can be demonstrated, and so the DM 2 policy test could be satisfied. A separate report addressing this matter has been prepared. - Cumulative impacts have been considered and acceptable in principle. The matter will be assessed in further detail as part of any planning application stage. - The nominated site is for a hard rock extension to the current quarry workings. The existing site access and aggregate processing area away from the proposed site would remain, restoration and habitat creation is proposed to be progressive behind any permitted extraction area. A suitable compensation strategy is proposed to address the loss of affected Plantation on Ancient Woodland Site (PAWS). Further detail would be provided part of any planning application stage. - The affected PROW would need to be temporarily re-routed and reinstated at end of site restoration. Any re-routing would require the support of the Public Rights of Way officer, - Quarrying impacts such as dust and noise (including vibration) are material concerns, and subject to mitigation that can be secured via strengthened development management criteria and future planning conditions. These matters will be considered further at any detailed planning application stage. The strengthened Mineral Sites Plan Development Management criteria would require appropriate mitigation and be in alignment with national government guidance (e.g. Planning Practice Guidance) - Losses of 'ancient woodland' at other sites are matters that were/are addressed by the consideration of the planning merits of these other developments. These have significantly different material characteristics that

Thames Crossing (LTC). • Strong call for alternative sources of aggregate that would not destroy ancient woodland, including Gallagher's racing paddock and land with Gallagher ownership. • Proposed extension would remove around 80,000 trees and ancient soils, releasing significant greenhouse gases and conflicting with climate commitments. • Expansion would worsen existing traffic, air quality, and noise issues from nearby housing growth. • Emphasises the importance of access to nature for mental health and wellbeing. Significant loss of green space is seen as unacceptable in an area already heavily developed and loss of recreational green spaces for walking, cycling, and horse riding. • Economic benefits to the operator are considered to be outweighed by environmental harm to residents. • The 2013 quarry approval should not set a precedent due to stronger climate and woodland protections now in place. • Doubts over claims of effective restoration, as no restored land has been returned to public use. • Suggestion to create a "Countryside Park" to support employment, wellbeing, and local income.		were/are considered and do not directly concern the assessment of the currently hard rock nominated site. • The National Planning Policy (NPPF) requires mineral planning authorities (MPA) to plan for the maintenance of aggregate landbanks over the adopted plan period to ensure a steady and adequate supply of aggregates to meet any specific aggregate market. Hard (crushed) rock is one such material. Following 2 call for sites, only the extension to Hermitage Quarry was submitted for consideration, The racing paddock (gallops) is around 8ha and is too small to meet the aggregate need. Other land within their control has previously been worked for minerals and restored. • The removal of the chestnut coppice tree cover of the PAWS and the translocation of soils could have a carbon loading element on the environment in the short term. The restoration of any quarried area back to woodland and the creation of new woodland on agricultural land could potentially have carbon gains, being a greater carbon sink over the long term. • Traffic generation is not anticipated to differ from current levels of traffic generation, as the nominated site would be a continuation of the quarrying activity, not an additional activity to current quarrying. As with current operating controls, conditions to control HGV movements (maxima) could be secured via strengthened development management criteria in the Sites Plan and any subsequent planning conditions. The strengthened Mineral Sites Plan Development Management Criteria would require any planning application to assess air quality impacts on the Aylesford Air Quality Management Area (AQMA) and how impacts would be mitigated. • With the exception of bridleway MR108 which crosses the site allocation and a byway (unaffected), the land is in private ownership and has no general right of public access. The landowner currently provides access to the community via a number of permissive paths. The bridleway would need to be temporarily relocated and reinstated upon completion of the development, as with the current quarrying activity, the operator advises that the permissive paths are intended to remain accessible being closed as necessary as works progress. • The economic benefits of quarrying to meet economic needs, along with the environmental and social impacts are central to the consideration of whether the allocation is justified. • The 2013 planning application for an extension to quarrying was assessed against all material planning concerns at that time. This does not set a precedent for the way the County Council has to discharge its plan making responsibilities. Moreover, in doing so now, it has to consider the current material planning considerations. • Effective restoration is not measured by the availability of land for public use. • A countryside park is not being promoted as part of the site's restoration. The restoration scheme would need to deliver the compensation strategy for the loss of the PAWS site, with full details assessed at planning application stage. The promoter has indicated that the access to the permissive paths across the site would remain.

• Concern restored land could lose protection and become vulnerable to housing development. • Concerns over inadequate supporting infrastructure (schools, healthcare) alongside development. • Proposes retraining quarry workers for conservation, outreach, or environmental roles. • Urges KCC to act consistently with its climate emergency declaration and biodiversity commitments by removing the site from the plan. • Questions the calculation of the 17.4 million tonne shortfall by 2039, suggesting assumptions may be flawed and the deficit overstated. • Criticises the use of high-quality Kentish Ragstone for decorative and retail purposes rather than conserving it for heritage restoration, arguing profit is prioritised over preservation. • Raises concern about blasting vibrations, potential damage to homes (including visible cracking), possible impacts on property values, and requests investigation into whether quarry blasting contributed to sinkholes recorded in 2020. • Ragstone is a non-renewable resource.		• Land restored post quarrying remains land under private ownership. Restoration and aftercare would be secured through planning conditions/obligations and restoration proposals (as envisaged by the updated development management criteria for the site) do not include built development. Any future proposal for a different use would require separate planning permission and would be assessed against the development plan and other material considerations at that time. • The maintenance of adequate “supporting infrastructure (schools, healthcare) alongside development” is not a specifically relevant consideration as the promoted site, for a quarry operation, would not exert any significant pressure on community facilities. • Any requirement for re-training quarry staff in the event of closure of the existing quarry is a matter for the quarry operator to consider as an employer. This is not a material planning matter for consideration for the site allocation. • In determining whether the site should be allocated, regard has been given to the requirements of planning policy including the impacts on climate change. The KMWLP policy seeks to minimise transportation for minerals with local supply rather than more carbon intensive importation. • The adopted KMWLP identified a need for 17.4mt based upon 2023 aggregate monitoring data. The aggregate monitoring (AM) data for 2024 sales and current reserves indicate that 19.9mt of additional reserves are required over the plan period to 2039. The Local Aggregate Assessment (LAA) 2025 demonstrates how this calculation has been reached. • The extraction of aggregate facilitates the maintenance of supply for the dimension stone and is a key part of a sustainable mineral supply system. The quality of the Hythe Formation shows variation both vertically and laterally along its span in Kent. The Boughton Group of the Hythe Formation has been quarried since Roman times from this part of Kent and has sets (this refers to ordered, parallel or sub-parallel groupings of sedimentary features that share similar orientations, characteristics and origins) of sufficient depth to enable dimension stone to be quarried and used in construction for both new buildings and for the restoration and maintenance of building of special heritage importance. In order to access the sets that can yield dimension stone a significant quantity of material unsuitable for dimension stone has to be extracted. This ‘other’ material is a 50:50 ratio of a loose unconsolidated mudstone called Hassock and layers of limestone that can be used as a highly specified aggregate, as crushed rock. Quarrying to produce the aggregate enables the far less frequent sets of larger size suitable for dimension stone use to be sourced. Essentially aggregate quarrying supports the production of suitable dimension stone supply. • This has been considered as part of the detailed assessment and can be mitigated via strengthened development management criteria and secured via appropriate planning conditions. Further details would be addressed at planning application stage. Vibration and noise from blasting is subject to strictly controlled limitations in terms of peak particle velocities and air overpressure decibel limitations at the existing site. These controls would be carried forward if any planning permission were to be granted. The sink hole that appeared on the M2/M20 corridor in Kent was apparently caused by a combination of intense, prolonged rainfall and the underlying chalk geology of the area. Investigations confirmed that a Dene Hole (an ancient man-made underground chalk chamber) had collapsed after heavy rain washed away the overburden capping it. • The Hythe Formation (Kentish Ragstone) is a natural geological deposit and is therefore finite. The characterises of the limestone make it able to meet a wide range of primary aggregate construction uses, up to and including

• Replanting rates will not compensate for woodland loss. • The site includes irreplaceable assets, including a SSSI, groundwater resources, and Grade 2 agricultural land.		structural concrete and capable of meeting construction needs of the plan period (to 2039). • In order to justify mineral extraction that results in a loss of the PAWS, the test of “wholly exceptional reasons” must be satisfied, and a suitable compensation strategy be provided. The proposal provides for a net gain of some 112ha of new native planting and enhanced management of existing woodland. The total woodland creation and enhancement equate to 154 ha, which would be created compared to the 42ha woodland (including 41ha of PAWS) which is assumed would be lost to facilitate mineral working. This equates to a 266% increase of native mixed species woodland (by creation and enhancement). The strategy also includes the translocation of PAWS soils. The compensation strategy is considered acceptable to satisfy the policy test. • This is considered in the assessment. The SSSI is a geomorphological feature. There is a buffer between the SSSI, and the area proposed to be worked, and therefore there would be no direct impacts. At the planning application stage, a detailed assessment of the potential impacts of blasting, including on the SSSI, will be undertaken and the boundary of the working area will be adjusted as necessary to minimise unacceptable adverse impacts. The development management criteria for this site have been updated in the Pre-Submission Draft Plan to ensure this matter will be properly accounted for. Advice from the Environment Agency will inform safe working controls for water resources. It has advised that only quarrying above the water table using inert materials is acceptable. This can be secured by planning condition and is identified as a proposed development management criteria in the emerging Sites Plan. Any infilling activities would require an EA waste permit to control waste types. The agricultural land is currently used for pasture. Part would be retained, with some used as part of the land for the compensation strategy broad leaf native woodland planting. This, together with phased restoration with native broad leaved woodland species, is considered acceptable to mitigate the impact of further quarrying.
• Considers the proposal to be fundamentally incompatible with addressing the climate and biodiversity emergencies. • Argues that the destruction of ancient woodland cannot be adequately mitigated, compensated for, or replaced. Raises moral objections, emphasising intergenerational responsibility to protect ancient woodland.	General Public (outside Kent) (x242)	• The County Council, as the mineral planning authority is required by national planning policy (NPPF) to plan for a steady and adequate supply of primary land-won aggregates to meet defined markets over the plan period. In doing so this would negate increased importation to meet needs and thus reduce carbon emissions that would otherwise be incurred. Progressive restoration and increased overall native species of broad leaf woodland and management, along with the translocation of soils is proposed to satisfy the required ‘suitable compensation scheme’. Allocation is dependent upon a suitable compensation strategy, which provides for a net gain of some 112ha of new native planting and enhanced management of existing woodland. The total woodland creation and enhancement equate to 154 ha, which would be created compared to the 42ha woodland (including 41ha of PAWS) which is assumed would be lost to facilitate mineral working. This equates to a 266% increase of native mixed species woodland (by creation and enhancement). The strategy includes the translocation of PAWS soils. This strategy is considered acceptable to satisfy the policy test. • The policy objective to protect ancient woodland is recognised in the technical assessment. Part of the site is recognised as ancient woodland, being a Plantation on Ancient Woodland Site (PAWS). A PAWS site is where native trees were cleared and replaced by non-native plantations, in this case a sweet chestnut managed woodland, and is recognised as an irreplaceable habitat including the woodland features as undisturbed soil, ground flora and fungi. It is acknowledged that the development (quarrying for aggregate minerals) would result in the loss of PAWS. Any PAWS losses as a consequence of quarrying have to be justified by “wholly exceptional reasons”, together with a suitable compensation strategy. The assessment of whether wholly exceptional reasons exist considers economic, social and environmental matters. This includes the need to plan for a steady and adequate supply of primary land-won aggregates to meet defined markets over the plan period and the socio-economic and environmental benefits that accrue from maintaining a local supply. The Council is satisfied that wholly exceptional reasons exist and a suitable compensation strategy can be demonstrated, and so the DM 2

• States that the proposal would result in the loss of over 50 hectares of irreplaceable ancient woodland. • Highlights that ancient woodland is a vital carbon store and supports significant native biodiversity. • Notes that ancient woodland makes up only 2.5% of England's land area and is a nationally important heritage asset. • Conflict with Kent County Council's climate emergency declaration (2019) and commitment to increase tree cover (2022) and undermine national climate and nature policy objectives, including Net Zero by 2050. • Refers to previous impacts from quarrying activity, including felling of mature trees and blasting vibration affecting nearby residents. • Questions whether the need for Kentish ragstone justifies the level of environmental harm, particularly where material is used for aggregate. • Suggests alternative quarrying approaches (such as tunnelling) that could avoid loss of woodland. • States that Oaken Wood is functionally irreplaceable from a conservation perspective. Identifies Oaken Wood as supporting a wide range of protected and priority species, including birds, mammals, reptiles, and invertebrates.		policy test could be satisfied. A separate report addressing this matter has been prepared. • The allocation would result in the loss of up to 41ha of PAWS. The County Council recognises the policy protection afforded to the PAWS site and considers that the NPPF policy requirement for "wholly exceptional reasons" and a suitable compensation strategy exist to justify the allocation of the site. • The impact on carbon and the biodiversity has been considered in the assessment. Allocation is dependent upon a suitable compensation strategy, which provides for some 112ha of new native planting and enhanced management of existing woodland. The total woodland creation and enhancement equate to 154 ha. This equates to a 266% increase of native mixed species woodland (by creation and enhancement). The strategy includes new and managed woodland, habitat creation and habitat management, along with the translocation of soils. This strategy is considered acceptable to satisfy the policy test. • Noted and has been considered in the assessment. • This has been considered in the assessment. The promoter of the site for allocation proposes greater woodland coverage (266%) to mitigate the loss of the PAWS designation. This would have a longer-term beneficial effect on carbon sequestration by woodland. The allocation of the site would facilitate aggregate from a Kent land-won resource, resulting in far less carbon emissions that would occur if an equivalent amount of aggregate were to be imported over the plan period. Importation of aggregate supply would have a greater impact on carbon loading and the Government's policy for Net Zero by 2050 • Previous and current quarrying activity is controlled by detailed planning permissions that includes conditions to control a wide range of local amenity and environmental matters. This includes controls on blasting (in relation to peak particle velocity and air over pressure limitations) imposed by the Secretary of State, which reflect acceptable conditional mineral planning permission requirements. • Hard (crushed) rock from the Hythe Formation (Kentish Ragstone) is a primary aggregate yielding geological formation that can meet the full spectrum of specified construction uses, including structural concrete. This is not a feature of all primary aggregates nor one that secondary and recycled aggregates can generally meet. The NPPF requires mineral planning authorities to make provision for a steady and adequate supply of land-won aggregates to meet defined market needs. On reviewing the available data on reserves and the projected need against other policy considerations, the allocation is justified. • Underground mining for aggregates is unlikely to be viable, unless they are scaled to meet the requirements at national or international scale. Following the second Call for Sites, no such proposal was advanced. • This is recognised in the technical assessment. The ecological value of Oaken Wood is a material planning consideration and has been considered as part of the assessment. Quarrying activity in the future would be dependent upon a conditional planning permission which would need to demonstrate appropriate compensation and mitigation for biodiversity impacts. The compensation strategy will provide for a net gain of some 112ha of new native planting and enhanced management of existing woodland. The total woodland creation and enhancement equate to 154 ha, which would be created compared to the 42ha woodland (including 41ha of

• Raises concern over significant carbon release from disturbance of ancient woodland soils. • Notes that parts of the site are designated as a Site of Special Scientific Interest (SSSI) and should therefore be protected. • Claims the scale of potential woodland loss could exceed that associated with HS2 and the Lower Thames Crossing combined and represents one of the most significant single threats to ancient woodland in England in recent decades. • Urges the planning authority to apply the National Planning Policy Framework protections for irreplaceable habitats and reject the allocation.		PAWS) which is assumed would be lost to facilitate mineral working. This equates to a 266% increase of native mixed species woodland (by creation and enhancement). The strategy also includes the translocation of PAWS soils. The compensation strategy is considered acceptable to satisfy the policy test. • Carbon release due to the removal of vegetation and disturbance of topsoil that exposes organic matter, giving rise to rapid mineralisation and oxidation would be minimised by a phased approach to both extraction and restoration. The final restoration proposal is to increase woodland coverage, increasing the overall carbon sequestration by woodland in the future. Moreover, the alternative to land-won extraction to meet Kent's needs would be by greater importation. Given that hard rock is geologically distant from Kent, apart from the Hythe Formation in Kent, carbon emissions from importation from Somerset, Leicestershire, Scotland or Norway would be significantly higher. • The Site of Special Scientific Interest (SSSI) is a geomorphological feature associated with the last glaciation event. There is a buffer between the SSSI, and the area proposed to be worked, and therefore no direct impacts. At the planning application stage, a detailed assessment of the potential impacts of blasting, including on the SSSI, will be undertaken and the boundary of the working area will be adjusted as necessary to minimise unacceptable adverse impacts. The development management criteria for this site have been updated in the Pre-Submission Draft Plan to ensure this matter will be properly accounted for. • Noted. The HS2 project results in up to 21 ha of loss and the Lower Thames Crossing project is expected to take a further 8ha, some 29ha in total. The nominated site would result in the loss of some 41ha of Ancient Woodland (PAWS) designation. It is also noted that the land take may be reduced at the detailed design stage. • The NPPF policy test has been applied in the technical assessment for the local plan work. Part of the site is recognised as ancient woodland, being a Plantation on Ancient Woodland Site (PAWS). A PAWS site is where native trees were cleared and replaced by non-native plantations, in this case a sweet chestnut managed woodland, and is recognised as an irreplaceable habitat including the woodland features as undisturbed soil, ground flora and fungi. It is acknowledged that the development (quarrying for aggregate minerals) would result in the loss of PAWS. Any PAWS losses as a consequence of quarrying have to be justified by "wholly exceptional reasons", together with a suitable compensation strategy. The assessment of whether wholly exceptional reasons exist considers economic, social and environmental matters. This includes the need to plan for a steady and adequate supply of primary land-won aggregates to meet defined markets over the plan period and the socio-economic and environmental benefits that accrue from maintaining a local supply. The Council is satisfied that wholly exceptions reasons exist and a suitable compensation strategy can be demonstrated, and so the DM 2 policy test could be satisfied. A separate report addressing this matter has been prepared.
Petition that states: <i>"We must not lose any more ancient woodland or farmland, particularly for a quarry extracting stone that we don't need. Ragstone is a poor material to build houses from and it doesn't insulate well. For heritage restoration there are other sources of ragstone.</i> <i>Once ancient woodland take 400 years to develop its</i>	409 (with 6 duplicates) parties signed the petition addressed to former Cabinet Member Susan Carey – submitted via Cllr Stuart Jeffery	• The NPPF policy test has been applied in the technical assessment for the local plan work. Part of the site is recognised as ancient woodland, being a Plantation on Ancient Woodland Site (PAWS). A PAWS site is where native trees were cleared and replaced by non-native plantations, in this case a sweet chestnut managed woodland, and is recognised as an irreplaceable habitat including the woodland features as undisturbed soil, ground flora and fungi. It is acknowledged that the development (quarrying for aggregate minerals) would result in the loss of PAWS. Any PAWS losses as a consequence of quarrying have to be justified by "wholly exceptional reasons", together with a suitable compensation strategy. The assessment of whether wholly exceptional reasons exist considers economic, social and environmental matters. This includes the need to plan for a steady and adequate supply of primary land-won aggregates to meet defined markets over the plan period and the socio-economic and environmental benefits that accrue from maintaining a local supply. The Council is satisfied that

<i>special biodiversity and once it's gone it's gone. And we desperately need to preserve our farm land for the future."</i>		wholly exceptions reasons exist and a suitable compensation strategy can be demonstrated, and so the DM 2 policy test could be satisfied. A separate report addressing this matter has been prepared. The allocation would provide a net gain of some 112ha of new native planting and enhanced management of existing woodland. The total woodland creation and enhancement equate to 154 ha, which would be created compared to the 42ha woodland (including 41ha of PAWS) which is assumed would be lost to facilitate mineral working. This equates to a 266% increase of native mixed species woodland (by creation and enhancement). The strategy also includes the translocation of PAWS soils. The compensation strategy is considered acceptable to satisfy the policy test. Ragstone is a high-quality material used for a number of applications as it is a versatile, high strength limestone. As an aggregate it can be used for high specification concrete mixes such as structural concrete in foundations and general building projects. It also has applications as a road construction sub-base (such as Type 1 or Type 3 sub-base) and as a coated stone (asphalt) material in road construction and maintenance. The angular nature of the crushed rock as a sized aggregate (10-20mm) makes the material suitable for permeable drainage applications and loose 'gravel' areas in pathways and gardens. The larger sized spalls (100-200mm) are used as a heavy fill in gabion baskets for use as retaining walls, slope stabilisation and as 'riprap' coastal defence works. The site would also produce building or masoned dimension stone which is used for building and restoration purposes. These are important in terms of maintaining local traditional architectural vernacular and particularly for heritage conservation uses where Kentish Ragstone has been used in their construction. This includes the cathedrals of Rochester and Canterbury, the Tower of London, the Archbishop's Place in Maidstone and many listed buildings in the county. Whilst Kentish Ragstone is no longer used as a main building material for volume house building, it has an important role to play in new build projects where it is used to reflect the traditional architectural vernacular of the area. It is recognised that ancient woodland is designated as an irreplaceable habitat and this is considered in the detailed assessment work.
- The proposal is out of touch with the climate and nature crises we currently face. Ancient woodland such as Oaken Wood is an irreplaceable habitat that acts as a vital carbon store and is home to rare and diverse animal and plant life. - The extension could threaten over 50 hectares of this precious habitat. This would be a disgraceful act of destruction that no amount of compensatory planting and future landscape restoration could absolve.	Woodland Trust Campaign (25,473) letters/emails	- The NPPF policy test has been applied in the technical assessment for the local plan work. Part of the site is recognised as ancient woodland, being a Plantation on Ancient Woodland Site (PAWS). A PAWS site is where native trees were cleared and replaced by non-native plantations, in this case a sweet chestnut managed woodland, and is recognised as an irreplaceable habitat including the woodland features as undisturbed soil, ground flora and fungi. It is acknowledged that the development (quarrying for aggregate minerals) would result in the loss of PAWS. Any PAWS losses as a consequence of quarrying have to be justified by "wholly exceptional reasons", together with a suitable compensation strategy. The assessment of whether wholly exceptional reasons exist considers economic, social and environmental matters. This includes the need to plan for a steady and adequate supply of primary land-won aggregates to meet defined markets over the plan period and the socio-economic and environmental benefits that accrue from maintaining a local supply. The Council is satisfied that wholly exceptions reasons exist and a suitable compensation strategy can be demonstrated, and so the DM 2 policy test could be satisfied. A separate report addressing this matter has been prepared. - The allocation would provide a net gain of some 112ha of new native planting and enhanced management of existing woodland. The total woodland creation and enhancement equate to 154 ha, which would be created compared to the 42ha woodland (including 41ha of PAWS) which is assumed would be lost to facilitate mineral working. This equates to a 266% increase of native mixed species woodland (by creation and enhancement). The strategy also includes the translocation of PAWS soils. The compensation strategy is considered acceptable to satisfy the policy test. The allocation would result in the loss of up to 41ha of PAWS, along with the translocation of soils and progressive restoration. The strengthened Mineral Sites Plan Development Management Criteria would require any planning application to detailed restoration proposals to demonstrate that the losses of this priority habitat would be compensated by restoration details including the range of trees and

In 2019, Kent County Council recognised the UK's climate and environment emergency. In 2022, it committed to protecting and increasing the county's tree cover. And the Environment Act (2021) has introduced a mandatory Biodiversity Net Gain requirement that will apply from late 2023. Approving the expansion of this scheme would be utterly at odds with these values and requirements.		shrub sizes of native species to create a vertical design element to the replacement woodland planting, detailed ecological appraisals to enable to enhance the biodiversity of restoration and translocation of ancient woodland soils with ongoing monitoring. Construction needs still require primary aggregate supply to meet the full range of specified aggregate applications. Crushed Hard rock from the Hythe Formation can be used for structural concrete applications where other primary aggregates and secondary and recycled aggregates cannot. The NPPF requires Kent as a mineral planning authority to plan for a steady and adequate supply of primary aggregates where there is a distinctive market for the type of aggregate being worked. This negates greater importation into the area and reduces, per tonne of supplied aggregate, the carbon emissions that would otherwise be incurred from their transportation nationally and potentially internationally to meet identified needs. A landwon resource results in reduced carbon impacts and associated HGV movements than importation.
- A designated Ancient Woodland is under threat from allowing the expansion of Hermitage Quarry as a nominated allocation site pursuant to the draft KMWLP, this would include the loss of 75,000 trees and affect a SSSI. - The woodland acts as a vital tool in reducing air pollution and provides a cooling affect. - Many local people enjoy the beauty of the	Friends of Oaken Wood - 84 letters (all duplicates) submitted to former Cabinet Member by Cllr Stuart Jeffrey in March 2026	- The NPPF policy test has been applied in the technical assessment for the local plan work. Part of the site is recognised as ancient woodland, being a Plantation on Ancient Woodland Site (PAWS). A PAWS site is where native trees were cleared and replaced by non-native plantations, in this case a sweet chestnut managed woodland, and is recognised as an irreplaceable habitat including the woodland features as undisturbed soil, ground flora and fungi. It is acknowledged that the development (quarrying for aggregate minerals) would result in the loss of PAWS. Any PAWS losses as a consequence of quarrying have to be justified by "wholly exceptional reasons", together with a suitable compensation strategy. The assessment of whether wholly exceptional reasons exist considers the relevant economic, social and environmental matters. This includes the need to plan for a steady and adequate supply of primary land-won aggregates to meet defined markets over the plan period and the socio-economic and environmental benefits that accrue from maintaining a local mineral supply. The Council is satisfied that wholly exceptional reasons, and a suitable compensation strategy can be demonstrated, and so the DM 2 policy test could be satisfied. A separate report addressing this matter has been prepared. The allocation would provide a net gain of some 112ha of new native planting and enhanced management of existing woodland. The total woodland creation and enhancement equate to 154 ha, which would be created compared to the 42ha woodland (including 41ha of PAWS) which is assumed would be lost to facilitate mineral working. This equates to a 266% increase of native mixed species woodland (by creation and enhancement). The strategy also includes the translocation of PAWS soils. The compensation strategy is considered acceptable to satisfy the policy test. The Site of Special Scientific Interest (SSSI) is a geomorphological feature associated with the last glacial episode. There is a buffer between the SSSI, and the area proposed to be worked, and therefore there would be no direct impacts. At the planning application stage, a detailed assessment of the potential impacts of blasting, including on the SSSI, will be undertaken and the boundary of the working area will be adjusted as necessary to minimise unacceptable adverse impacts. The development management criteria for this site have been updated in the Pre-Submission Draft Plan to ensure this matter will be properly accounted for. - The air pollution associated with background levels are reduced by woodland, trees and vegetation capture particulate matter on leaf surfaces and absorb gasses such as nitrogen dioxide (NO2) and carbon dioxide (CO2) sequestration. While some trees would be lost for a temporary period, the area around the site is wooded and so beneficial impacts would still occur and ultimately be greater than they are now as the restoration is designed to increase woodland (with broad leaf native species) coverage. - With the exception of bridleway MR108 which crosses the site allocation and a byway (unaffected by the local

woodland and is necessary to the well-being of local people. The production of construction aggregate will contribute to environmental problems.		plan work), the land is in private ownership and has no general right of public access. The landowner currently provides access to the community via a number of permissive paths. The bridleway would need to be temporarily relocated and reinstated upon completion of the development. As with the current quarrying activity, the operator advises that the permissive paths are intended to remain accessible being closed as necessary as works progress. Construction needs require primary aggregate supply to meet the full range of specified aggregate applications. Crushed Hard rock from the Hythe Formation can be used for structural concrete applications where other primary aggregates and secondary and recycled aggregates cannot. The NPPF requires KCC as a mineral planning authority to plan for a steady and adequate supply of primary aggregates where there is a distinctive market for the type of aggregate being exploited. This then negates greater importation into the area and reduces, per tonne of supplied aggregate, the carbon emissions that would otherwise be incurred from their transportation nationally and potentially internationally to meet identified needs. Thereby reducing carbon impacts and the associated HGV movements that would be required and be potentially avoided by ensuring continued land-won supply. As with the current mineral activity, detailed planning controls would be put in place to mitigate environmental and amenity impacts to an acceptable level. Further detail of these is provided for in the strengthened development management criteria in the emerging Sites Plan.
- Significant ecological, environmental, and sustainability impacts. The site is ancient, replanted woodland with priority deciduous habitat present. The woodland biome has taken 400+ years to develop; quarrying would cause irreversible biodiversity loss. - Habitat replacement/compensation cannot replicate the original ecosystem and is not guaranteed in the plan. Soil is a living resource and would degrade if stripped and stockpiled. - Site provides habitat for turtle doves which have declined by ~93% in the UK since the 1970s due to habitat loss affecting breeding success. - The claim of achieving biodiversity net gain (BNG) is considered incorrect.	Maidstone Green Party	- Ecological, environmental, and sustainability impacts have been considered in the technical assessment and are considered capable of being satisfactorily compensated and addressed in the strengthened development management criteria and in future planning conditions. - Part of the site is recognised as ancient woodland, being a Plantation on Ancient Woodland Site (PAWS). A PAWS site is where native trees were cleared and replaced by non-native plantations, in this case a sweet chestnut managed woodland, and is recognised as an irreplaceable habitat including the woodland features as undisturbed soil, ground flora and fungi. It is acknowledged that the development (quarrying for aggregate minerals) would result in the loss of PAWS. Any PAWS losses as a consequence of quarrying have to be justified by “wholly exceptional reasons”, together with a suitable compensation strategy. The assessment of whether wholly exceptional reasons exist considers economic, social and environmental matters. This includes the need to plan for a steady and adequate supply of primary land-won aggregates to meet defined markets over the plan period and the socio-economic and environmental benefits that accrue from maintaining a local supply. The Council is satisfied that wholly exceptions reasons exist and a suitable compensation strategy can be demonstrated, and so the DM 2 policy test could be satisfied. A separate report addressing this matter has been prepared. - Allocation is dependent upon a suitable compensation strategy, which provides for a net gain of some 112ha of new native planting and enhanced management of existing woodland. The total woodland creation and enhancement equate to 154 ha, which would be created compared to the 42ha woodland (including 41ha of PAWS) which is assumed would be lost to facilitate mineral working. This equates to a 266% increase of native mixed species woodland (by creation and enhancement). The strategy includes the translocation of PAWS soils. The overall increase in available woodland in turn would expand available habitat opportunities for other species, including those of ornithological importance. - Noted. The compensation scheme would increase overall native woodland coverage.

- Land is under Countryside Stewardship (Higher Tier) and borders a Site of Special Scientific Interest (SSSI) - It is in high groundwater vulnerability and is within a drinking water protected zone. - Classified as Grade 2 agricultural land.		- The Site of Special Scientific Interest (SSSI) is a geomorphological feature representing a landform associated with the Pleistocene glacial retreat. There is a buffer between the SSSI, and the area proposed to be worked, and therefore there would be no direct impacts. At the planning application stage, a detailed assessment of the potential impacts of blasting, including on the SSSI, will be undertaken and the boundary of the working area will be adjusted as necessary to minimise unacceptable adverse impacts. The development management criteria for this site have been updated in the Pre-Submission Draft Plan to ensure this matter will be properly accounted for. - Water resource protection is material planning concern. The Environment Agency have stated that mineral extraction should only occur above the water table, this would be a conditional requirement of any detailed planning application. The strengthened Mineral Sites Plan Development Management Criteria also addresses water resources in that any mineral development must be in compliance with the Environment Agency's approach to the management and protection of groundwater resources. Infilling operations to effect restoration would have to adhere to waste management permitting requirements to prevent pollution, particularly to ground waters. Only inert materials would be permissible by the Environment Agency in its role as the waste permitting authority. This is a matter typically addressed at any detailed planning application stage. Controls would be secured via development management criteria and planning conditions. - The agricultural land grade of the relatively small non-woodland areas is considered to be Grade 2 (Very good) to Grade 3 (Good to Moderate). The intention is to use these areas for compensatory broadleaf woodland planting to compensate for the loss of ancient woodland (PAWS) soils. Fundamentally it is not the intention to 'lose' any soils as their retention and management would be a normal part of any detailed restoration scheme normal to mineral development. The details of which would be subject of consideration at any detailed planning application stage as set out the Pre-Submission Draft Plan's strengthened development management criteria.
- The national planning policy framework (NPPF) has changed significantly since 2013, with stronger policies on climate change, biodiversity and ancient woodland protection. - Planning policy makes no distinction between Oaken Wood and other ancient woodlands, contrary to the applicant's suggestion. - Alternative site options have not been considered, which is a core requirement of sound spatial planning. - The proposal would result in the loss of designated ancient woodland, including around 80,000 trees and ancient soils, releasing significant greenhouse gases.	Cllr Clive English (Maidstone Borough Council)	- The NPPF 2024 has significantly changed since the 2012/13 versions, particularly regarding the protection for ancient woodlands, climate change and mandatory net gain for biodiversity interests. The revised policy considerations have been addressed in the technical assessment, against policy requirements for the maintenance of a steady and adequate supply of aggregate minerals to meet defined market needs. The assessment work supports the case to allocate the site and that wholly exceptional reasons, and a suitable compensation scheme exist to satisfy NPPF policy. Furthermore, in maintaining local supply of this aggregate material would have a climate change benefit of negating the increased carbon emissions associated with increased aggregate importation. - Oaken Wood is correctly identified as a PAWS (Planted Ancient Woodland Sites) and Local Wildlife Site and has been assessed on that basis. - For a site to be allocated it has to be deliverable. In response to the two Call for Sites exercises, only the extension to Hermitage Quarry was promoted. In terms of potential alternatives to meet the identified need, the County Council also reviewed the sites that had been previously examined by the Planning Inspectorate and considered the impact of substituting land-won aggregate hard rock supply with greater importation over wharves and rail depots. - The intention is to retain the PAWS soil characteristics as much as possible by translocation with progressive restoration. Moreover, this would be supplemented with increased broad leaf native species woodland coverage with an overall increased area for woodland plantation progressively with a phased restoration of the quarried area. Such that in the long term a net gain in woodland coverage and species diversity would occur.

• Development would harm legally protected species and impact groundwater, worsening existing water resource pressures. • Potential impacts on groundwater, traffic, noise, and air quality have not been adequately assessed. • Claims about landscape restoration are uncertain, and restored land could become vulnerable to future housing development once woodland protection is removed.		• The promoted site's maximum depth of extraction is intended to be above recorded groundwater level and in accordance with advice from Environment Agency, the strengthened Mineral Sites Plan Development Management Criteria also addresses water resources in that any mineral development must be in compliance with the Environment Agency's approach to the management and protection of groundwater resources. Infilling the quarried void would be subject to the Environment Agency's waste management permitting requirements to prevent pollution by controlling what waste inputs are permitted. • These aspects have been considered in sufficient detail for the plan making stage. Further details would be necessary at planning application stage and will be informed by strengthened development management criteria in the Local Plan. Mineral Sites Plan Development Management Criteria also addresses health and amenity in that any application shall be accompanied by a lighting, noise, air quality, vibration and blasting assessments and contain appropriate mitigation, while following any national Government guidance (e.g. Planning Practice Guidance). • This is not a relevant consideration for plan making. Future uses of any restored land would require planning permission and detailed assessment at that time. A restored quarry site is not considered brownfield. It is noted that the previously restored land at the Hermitage site has not been released for other development.
• Over the past six years, Barming has experienced significant residential development, including 414 homes in Barming and over 1,200 homes along Hermitage Lane. Barming is considered unable to accommodate further development without worsening existing impacts. Note that Tonbridge and Malling BC's failure to meet housing needs has shifted development pressure onto Northwest Maidstone. This displacement has exacerbated environmental and infrastructure pressures in the area. • This development has resulted in substantial loss of green space. • Residents are experiencing reduced quality of life due to increased traffic congestion and pollution. • KCC are requested to commission a detailed report on all alternative crushed rock sites.	Cllr Fay Gooch (Maidstone Borough Council)	• The County Council is aware of the local development pressure, particularly on the road infrastructure and has considered this in its assessment of the proposed hard rock allocation site. It has concluded that continuation of the level of extraction and thus HGV numbers on the local infrastructure is acceptable, with impacts being addressed in the strengthened Mineral Sites Plan Development Management Criteria that would require a detailed transport assessment to demonstrate compliance with the adopted Kent Minerals and Waste Local Plan Policy DM 13. Moreover, any planning permission would secure any required mitigations by the imposition of appropriate planning permission conditions. • With the exception of bridleway MR108 which crosses the site allocation and a byway (unaffected), the land is in private ownership and has no general right of public access. The landowner currently provides access to the community via a number of permissive paths. The bridleway would need to be temporarily relocated and reinstated upon completion of the development; the strengthened Mineral Sites Plan Development Management Criteria that would require a proposal to demonstrate screening to mitigate impacts and the maintenance of connectivity with the surrounding network. Moreover, as with the current quarrying activity, the operator advises that the permissive paths are intended to remain accessible being closed as necessary as works progress. • Noted. Traffic impacts have been assessed and considered acceptable at current level, subject to the need for conditions at any planning permission following any planning application stage for HGV limitations to alleviate flows during peak times. • Alternatives to meeting the identified aggregate need have been considered. For a site to be allocated it has to be deliverable. In response to the two Call for Sites exercises, only the extension to Hermitage Quarry was promoted. In terms of potential alternatives to meet the identified need, the County Council has also reviewed the

		sites that had been previously examined by the Planning Inspectorate and considered the impact of substituting land-won aggregate hard rock supply with greater importation over wharves and rail depots.
Recommend raising a Linesearch before U Dig enquiry to positively identify the asset owner of the powerlines.	National Grid	Noted.
- In terms of traffic movements, the allocation should be a continuation of, and not additional to the current permitted workings. - KCC is satisfied that the current planning permission conditions are being adhered to and the adherence is not raising any concerns. - The supporting evidence is suitably up-to-date, relevant and robust. - Planning permission conditions should cover all activities at the site and the operational working plans/ travel plans etc, plan for and achieve.	National Highways	- The site promoter intends to work the proposed allocation as a continuation of current operations, with similar operational controls. No intensification is proposed. Controls would be secured via strengthened development management criteria and planning conditions. - The current planning permission conditions are effective in controlling the impacts of the current operations at Hermitage Quarry. These would be reviewed as part of any planning application. - The County Highway Authority raises no objection, subject to imposition of similar conditions to limit HGV movements during peak times. It is satisfied that there is no need for further sensitivity testing for potential highways or development scenarios to be undertaken as part of the local plan work. - These are matters to be addressed at any planning application stage and will need to address the strengthened development management criteria in the emerging Sites Plan
- Policy CSM 2 supports the review of the Plan and the extension of the Plan Period to 2039 and the policy to maintain a landbank of at least 7 years supply for sharp sand and gravel as long as resources and reserves allow. With maintained landbanks of at least 7 years for soft sand and at least 10 years for hard rock throughout the Plan. - The 10-year average of sharp sand and gravel sales on the Draft Review Plan appears low. 10-year average reported in LAA 2022 is 186,150 tonnes but the sales figures represented in Table 2 of the LAA says 228,544tpa. A minimum 7-year landbank to be maintained would be 1.6mt which would be inadequate by 2027 if the potential yield in the allocated sites is not realised or by 2038. If not the minimum landbank would not be maintained at the end of the Plan period. The level of provision, based on the LAA (2022) rate would be 5.016mt, giving a larger shortfall of 2.962mt. Taking into account the protentional yield rather than the reverse, the surplus reported in the Plan then becomes a shortfall of 0.462mt. - Soft sand, the 10-year figure for soft sand used in the Plan is higher than that in the LAA 2022 (0.456mtpa). the resulting requirement over the Plan period would be 10.032mt. A minimum 7-years landbank to be maintained would be 3.2mt. By 2029 the reserves	Mineral Products Association (MPA)	- Policy CSM2 of the adopted KMWLP 2024-39 sets out the aggregate need requirements, with allocations in the Mineral Sites Plan. The policy allows for the update of requirements based on the most recent LAA data. The LAA2025 (2024 data) demonstrates that over the KMWLP period there will be a 1.6mt surplus of sharp sands and gravel, given current landbanks and the injection of 2.5mt from the Mineral Site Plan allocations. - For Soft Sands there will be a technical shortfall of reserves available for a maintained 7-year landbank (3.399mt). This will occur in 2035 given anticipated replenishments from the Chapel Farm allocation in the Mineral Sites Plan and windfall reserves from non-mineral development estimated as at least 0.84mt. Given that there are two local plan reviews for the KMWLP before 2035, the Inspector who examined the KMWLP in 2024/25 accepted that no further soft sand allocation is required at this time.

would be below the minimum landbank requirement should the allocated sites not be delivered, or by 2036 if they are. Hard Rock, support the use of the 6-year average of sales based on the most up-to-date information as an indicator of future demand and market for the material, given indications that demand has increased recently and is likely to continue at these levels. The LAA 2022 acknowledges that construction demand has been increasing and Kent plays an important role in supplying the South East, indicating the importance of ensuring adequate provision is made and landbanks are maintained where possible. The LAA indicates that demand has increased recently and is likely to continue to at these levels. There is support for the revised assessment of needs for additional hard rock reserves and the proposed allocation of land to the South and West of Hermitage Quarry as an extension as a necessary measure to address the shortfall in rock reserves in Kent. The minimum landbank required to be maintained is 12.4mt (equivalent to 10-years supply). As forecasts for 2024 reserves are 13.6mt, the minimum landbank would not be maintained beyond 2025. Therefore, reserves would be completely exhausted by 2035 without new reserves being permitted. The allocation is essential to provide certainty for investment in a planning application which will enable KCC to maintain the hard rock landbank until the end of the Plan period (15mt at 2039) and comply with the NPPF. Importing hard rock from elsewhere will entail higher carbon emissions. Reliance on imports would also have minimal local economic and social benefit.		The MPA support for further hard (crushed) rock provision by allocation of the promoted site in the MSP is noted. The LAA2025 (2024 data) has updated the 6-year sales average, the available landbank of this specific aggregate mineral and the required amount of potential new reserves to meet the NPPF needs over the Plan period, this now being 19.9mt.
Argues that alternative sites were not adequately considered before nominating Hermitage Quarry. Suggests alternatives such as importing hard rock from outside the county and calls for a thorough assessment of other potential sites within Kent.	CPRE	For a site to be allocated it has to be deliverable. In response to the two Call for Sites exercises, only the extension to Hermitage Quarry was promoted. In terms of potential alternatives to meet the identified need, the County Council has also reviewed the sites that had been previously examined by the Planning Inspectorate and considered the impact of substituting land-won aggregate hard rock supply with greater importation over wharves and rail depots. Importation of additional hard rock supply via wharves and rail depots would result in additional carbon emissions as a consequence of transporting the quarried materials over extended distances, such as from Scotland, Wales, the Mendips and internationally. Moreover, given the pattern of dispersal of the importation points there could be additional HGV road miles required to transport the imported aggregate to established markets. In addition, increased hard rock aggregate importation to take the place of Kent land-won provision would take up available importation capacity headroom that is necessary as it allows for flexibility within the system. The effect of an increase of some 1.0+mtpa of hard rock importation, along with the potential need to increase national aggregate supply overall, given the Mineral Product Association's recognition of a need for some 4 billion tonnes of aggregates between 2022 and 2035, could potentially adversely impact the resilience of Kent's importation system to maintain stability and its ability to address supply shocks. Maintaining the land-won resource where

• The site contains ancient woodland, which is irreplaceable and should be protected under NPPF paras 209, 180(c) and 211(b)). • Quarrying would adversely affect designated LWS and a SSSI. It would also result in the loss of Priority Habitat deciduous woodland. • The site includes Best and Most Versatile agricultural land, which should be safeguarded for food security and environmental benefits. • Development would negatively impact existing PROW, reducing connectivity and user experience (NPPF para 100). • The quarry would harm the setting of the Area of Outstanding Natural Beauty (AONB) (NPPF para 174(b)). • Nearby listed buildings would be adversely affected		possible will ensure, as far as feasible, that the mineral importation system can continue to operate efficiently. • The NPPF policy test has been applied in the technical assessment for the local plan work, which recognises part of the site as PAWS and a Local Wildlife Site. A PAWS site is where native trees were cleared and replaced by non-native plantations, in this case a sweet chestnut managed woodland, and is recognised as an irreplaceable habitat including the woodland features as undisturbed soil, ground flora and fungi. It is acknowledged that the development (quarrying for aggregate minerals) would result in the loss of PAWS. Any PAWS losses as a consequence of quarrying have to be justified by “wholly exceptional reasons”, together with a suitable compensation strategy. The assessment of whether wholly exceptional reasons exist considers economic, social and environmental matters. This includes the need to plan for a steady and adequate supply of primary land-won aggregates to meet defined markets over the plan period and the socio-economic and environmental benefits that accrue from maintaining a local supply. The Council is satisfied that wholly exceptions reasons exist and a suitable compensation strategy can be demonstrated, and so the DM 2 policy test could be satisfied. A separate report addressing this matter has been prepared. The allocation would provide a net gain of some 112ha of new native planting and enhanced management of existing woodland. The total woodland creation and enhancement equate to 154 ha, which would be created compared to the 42ha woodland (including 41ha of PAWS) which is assumed would be lost to facilitate mineral working. This equates to a 266% increase of native mixed species woodland (by creation and enhancement). The strategy also includes the translocation of PAWS soils. The compensation strategy is considered acceptable to satisfy the policy test. • The Oaken Wood SSSI is a geomorphological feature associated with the Pleistocene glacial retreat. There is a buffer between the SSSI, and the area proposed to be worked, and therefore there would be no direct impacts. At the planning application stage, a detailed assessment of the potential impacts of blasting, including on the SSSI, will be undertaken and the boundary of the working area will be adjusted as necessary to minimise unacceptable adverse impacts. The development management criteria for this site have been updated in the Pre-Submission Draft Plan to ensure this matter will be properly accounted for. The intention by the nominee is to restore the site progressively, translocating the soils and further increasing woodland coverage. • The agricultural land grade of the relatively small non-woodland areas is considered to be Grade 2 (Very good) to Grade 3 (Good to Moderate). The intention is to use these areas for native broadleaf woodland planting as part of the compensation strategy for the loss of ancient woodland (PAWS) soils. Fundamentally it is not the intention to ‘lose’ any soils as their retention and management would be a normal part of any detailed restoration scheme normal to mineral development. The details of which would be the subject of consideration at any detailed planning application stage as set out the Pre-Submission Draft Plan’s strengthened development management criteria • The Public Right of Way Authority has raised no objection in principle to the temporary diversion of the affected PROW. Mineral Sites Plan Development Management Criteria that would require a proposal to demonstrate screening to mitigate impacts and the maintenance of connectivity with the surrounding network. Moreover, as with the current quarrying activity, the operator advises that the permissive paths are intended to remain accessible being closed as necessary as works progress. • This potential impact on the setting of the National Landscape (formerly AONB) has been considered in the technical assessment and the indirect impact upon the National Landscape is considered acceptable. • This has been considered in the technical assessment. The indirect impact heritage assets are considered acceptable.

by quarry operations. - The local community would experience increased traffic, noise and air pollution, reducing quality of life. - Emphasises that planning decisions should minimise harm to the countryside and promote sustainable development (NPPF paras 33 and 34).		- This is considered in the technical assessment work. As a continuation of the quarrying operation at Hermitage Quarry, the traffic generation (HGV movements) is intended to continue not intensify as a consequence of working the nominated site. The Highway Authority has advised that Hermitage Lane has sufficient capacity to accommodate the continuation of quarry operations, subject to the reimposition of controls to limit HGVs during peak periods. This can be addressed via development management criteria and secured via planning condition. - This has been considered in the technical assessment work. The NPPF requires planning authorities to balance the economic, environmental and social material considerations when making planning decisions or preparing local plans.
- Strongly objects to the proposed Hermitage Quarry extension due to the loss and deterioration of ancient woodland. The extension would result in a nationally significant loss of ancient woodland and irreplaceable habitats. Ancient woodland is irreplaceable, covering only 2.5% of England's land area, and has high policy protection due to its ecological, cultural, historical, and landscape value. Mitigation and compensation cannot replace ancient woodland. - National and local policy offer strong protection, including NPPF paragraph 180, KCC Policy DM 2, the Kent Tree Strategy, and borough-level policies in Maidstone and Tonbridge & Malling. - Quarrying would cause serious indirect impacts through pollution, disturbance, and habitat fragmentation, leading to biodiversity loss. - There is a risk of direct loss and damage to ancient and veteran trees, including harm to root systems and changes to environmental conditions; veteran trees are recorded in the Ancient Tree Inventory. - The proposal would result in the loss of important carbon stores, undermining the UK's net-zero climate commitments, as ancient woodland stores more carbon per hectare than other woodland types.	Woodland Trust	- This is recognised in the technical assessment. The NPPF policy test and local plan policy requirements have been applied for the Mineral Sites Plan work, which recognises part of the site as PAWS and a Local Wildlife Site. A PAWS site is where native trees were cleared and replaced by non-native plantations, in this case a sweet chestnut managed woodland, and is recognised as an irreplaceable habitat including the woodland features as undisturbed soil, ground flora and fungi. It is acknowledged that the development (quarrying for aggregate minerals) would result in the loss of PAWS. Any PAWS losses as a consequence of quarrying have to be justified by "wholly exceptional reasons", together with a suitable compensation strategy. The assessment of whether wholly exceptional reasons exist considers economic, social and environmental matters. This includes the need to plan for a steady and adequate supply of primary land-won aggregates to meet defined markets over the plan period and the socio-economic and environmental benefits that accrue from maintaining a local supply. The Council is satisfied that wholly exceptions reasons exist and a suitable compensation strategy can be demonstrated, and so the DM 2 policy test could be satisfied. A separate report addressing this matter has been prepared. - The allocation would provide a net gain of some 112ha of new native planting and enhanced management of existing woodland. The total woodland creation and enhancement equate to 154 ha, which would be created compared to the 42ha woodland (including 41ha of PAWS) which is assumed would be lost to facilitate mineral working. This equates to a 266% increase of native mixed species woodland (by creation and enhancement). The strategy also includes the translocation of PAWS soils. The compensation strategy is considered acceptable to satisfy the DM 2 policy test of the KMWLP 2024-39. - Quarrying impacts such as dust and noise (including vibration) are material concerns and subject to mitigation that can be secured via strengthened development management criteria and future planning conditions. These matters will be considered further at any detailed planning application stage. - The Woodland Trust's Ancient Tree Inventory does not record any veteran trees on site. It recognises one notable oak as a mature tree. A Tree Preservation Order (TPO) is present on part of the site. This was put into force to maintain the sweet chestnut coppice woodland. Any effects on trees subject to a TPO would be assessed through the planning application process and controlled through any permission and associated conditions. - The allocation of the site would facilitate aggregate from a Kent land-won resource, resulting in far less carbon emissions (the principal pollutant) that would occur if an equivalent amount of aggregate were to be imported over the plan period. Importation of aggregate supply would have a greater impact on carbon loading and the Government's policy for Net Zero by 2050. The impact of the phased extraction and restoration of the proposed quarry would have an impact on carbon soil release and from the temporary loss of tree cover. The compensation

Almost 25,000 people, including many Kent residents, have objected to the proposal.		package includes a commitment to have a 266% increase of native mixed species woodland (by creation and enhancement). This would, over time increase the carbon sequestration by natural organic processes. This is understood by the Kent County Council mineral planning authority. Though the law restricts any decision by the County Council to the material planning considerations in evaluating whether the allocation of any site in a local plan complies with the relevant adopted local and national planning policies.
- UK Government legislation and policy now require stronger protection of the natural environment in planning decisions. - Considers that the perceived benefits of allocating the site do not constitute wholly exceptional circumstances to justify the loss of irreplaceable ancient woodland. Objects to the site's allocation would further degrade the Oaken Wood Local Wildlife Site (LWS). Oaken Wood supports a range of protected and red-list species, increasing concern over biodiversity loss. The perceived planning benefits are not considered to outweigh the loss of the LWS and its ecological value. - Oaken Wood is also designated as a SSSI for its geological importance. Appropriate weight must therefore be given to potential harm to the SSSI. - It is proposed that the Biodiversity Net Gain (BNG) objective be replaced with habitat-specific compensation where irreplaceable habitats are lost. Following losses from HS2, Kent Wildlife Trust recommends a 30:1 compensation planting ratio become a policy requirement for any future development involving ancient woodland.	Kent Wildlife Trust	- This is recognised in the technical assessment. The NPPF policy test and local plan policy requirements have been applied for the Mineral Sites Plan work, which recognises part of the site as PAWS and a Local Wildlife Site. A PAWS site is where native trees were cleared and replaced by non-native plantations, in this case a sweet chestnut managed woodland, and is recognised as an irreplaceable habitat including the woodland features as undisturbed soil, ground flora and fungi. It is acknowledged that the development (quarrying for aggregate minerals) would result in the loss of PAWS. Any PAWS losses as a consequence of quarrying have to be justified by "wholly exceptional reasons", together with a suitable compensation strategy. The assessment of whether wholly exceptional reasons exist considers economic, social and environmental matters. This includes the need to plan for a steady and adequate supply of primary land-won aggregates to meet defined markets over the plan period and the socio-economic and environmental benefits that accrue from maintaining a local supply. The Council is satisfied that wholly exceptions reasons exist and a suitable compensation strategy can be demonstrated, and so the DM 2 policy test could be satisfied. A separate report addressing this matter has been prepared. - Allocation is dependent upon a suitable compensation strategy, which provides for a net gain of some 112ha of new native planting and enhanced management of existing woodland. The total woodland creation and enhancement equate to 154 ha, which would be created compared to the 42ha woodland (including 41ha of PAWS) which is assumed would be lost to facilitate mineral working. This equates to a 266% increase of native mixed species woodland (by creation and enhancement). The strategy also includes the translocation of PAWS soils. The compensation strategy is considered acceptable to satisfy the policy test. - This is considered in the assessment. The SSSI is a geomorphological feature. There is a buffer between the SSSI, and the area proposed to be worked, and therefore there would be no direct impacts. At the planning application stage, a detailed assessment of the potential impacts of blasting, including on the SSSI, will be undertaken and the boundary of the working area will be adjusted as necessary to minimise unacceptable adverse impacts. The development management criteria for this site have been updated in the Pre-Submission Draft Plan to ensure this matter will be properly accounted for. - There is no prescriptive ratio for habitat replacement, each proposal having to be considered on a case-by-case basis. The 30:1 ratio for the HS2 project cannot be used a proxy for all development. The individual characteristics of sites and proposals need to be considered independently.
Serious concern over the loss of a large area of irreplaceable ancient woodland and its associated wildlife. Reports indicate the presence of rare,	RSPB	The NPPF policy test and local plan policy requirements have been applied for the Mineral Sites Plan work, which recognises part of the site as PAWS. A PAWS site is where native trees were cleared and replaced by non-native plantations, in this case a sweet chestnut managed woodland, and is recognised as an irreplaceable habitat

protected, and declining species on the site, including: ○ Woodcock ○ Spotted Flycatcher ○ Stag Beetle ○ Dormouse • Due to the ecological importance of the site, it is recommended that Oaken Wood be removed from the Kent Mineral Sites Plan (MSP).		including the woodland features as undisturbed soil, ground flora and fungi. It is acknowledged that the development (quarrying for aggregate minerals) would result in the loss of PAWS. Any PAWS losses as a consequence of quarrying have to be justified by “wholly exceptional reasons”, together with a suitable compensation strategy. The assessment of whether wholly exceptional reasons exist considers economic, social and environmental matters. This includes the need to plan for a steady and adequate supply of primary land-won aggregates to meet defined markets over the plan period and the socio-economic and environmental benefits that accrue from maintaining a local supply. The Council is satisfied that wholly exceptions reasons exist and a suitable compensation strategy can be demonstrated, and so the DM 2 policy test could be satisfied. A separate report addressing this matter has been prepared. • The allocation would provide a net gain of some 112ha of new native planting and enhanced management of existing woodland. The total woodland creation and enhancement equate to 154 ha, which would be created compared to the 42ha woodland (including 41ha of PAWS) which is assumed would be lost to facilitate mineral working. This equates to a 266% increase of native mixed species woodland (by creation and enhancement). The strategy also includes the translocation of PAWS soils. The compensation strategy is considered acceptable to satisfy the policy test. The increase habitat area would provide opportunities for other woodland species that are considered important for bito conservation, including protected ornithological species. At present the site is not part of the adopted Kent Mineral Sites Plan (MSP) and its potential allocation is the subject of detailed technical assessment.
• The inclusion of the nominated hard rock site is estimated to cause direct loss and deterioration of at least 45 hectares of ancient woodland. The loss of irreplaceable habitat is not adequately acknowledged or assessed in the draft Plan or supporting documents. NPPF paragraph 180(c) states that development resulting in the degradation of ancient woodland should only be permitted in exceptional circumstances. • A substantial compensation strategy would be required, although compensation should be treated as a last resort. Mitigation measures would be necessary to ensure no impacts on retained ancient woodland. Where impacts cannot be fully mitigated, additional compensation for loss and deterioration would need to be agreed. • Alternative provision should be explored outside the local authority area through the Duty to Cooperate and increased use of alternative materials.	Forestry Commission	• This is recognised in the technical assessment. The NPPF policy test and local plan policy requirements have been applied for the Mineral Sites Plan work, which recognises part of the site as PAWS and Local Wildlife Site. A PAWS site is where native trees were cleared and replaced by non-native plantations, in this case a sweet chestnut managed woodland, and is recognised as an irreplaceable habitat including the woodland features as undisturbed soil, ground flora and fungi. It is acknowledged that the development (quarrying for aggregate minerals) would result in the loss of PAWS. Any PAWS losses as a consequence of quarrying have to be justified by “wholly exceptional reasons”, together with a suitable compensation strategy. The assessment of whether wholly exceptional reasons exist considers economic, social and environmental matters. This includes the need to plan for a steady and adequate supply of primary land-won aggregates to meet defined markets over the plan period and the socio-economic and environmental benefits that accrue from maintaining a local supply. The Council is satisfied that wholly exceptions reasons exist and a suitable compensation strategy can be demonstrated, and so the DM 2 policy test could be satisfied. A separate report addressing this matter has been prepared. • Allocation is dependent upon a suitable compensation strategy, that provides for a net gain of some 112ha of new native planting and enhanced management of existing woodland. The total woodland creation and enhancement equate to 154 ha, which would be created compared to the 42ha woodland (including 41ha of PAWS) which is assumed would be lost to facilitate mineral working. This equates to a 266% increase of native mixed species woodland (by creation and enhancement). The strategy also includes the translocation of PAWS soils. The compensation strategy is considered acceptable to satisfy the policy test. • For a site to be allocated it has to be deliverable. In response to the two Call for Sites exercises, only the extension to Hermitage Quarry was promoted. In terms of potential alternatives to meet the identified need, the County Council has also reviewed the sites previously examined by the Planning Inspectorate when it granted planning permission for the current quarrying site, along with the impact of substituting land-won aggregate hard rock supply with greater importation over wharves and rail depots. The NPPF requires Mineral Planning Authorities to plan for a steady and adequate supply of land-won aggregate minerals in its area to meet defined needs of specific markets. Hard (crushed) rock from the Hythe Formation

		(Limestone-Kentish Ragstone) is a primary aggregate yielding geological formation that can meet the full spectrum of specified construction uses, including structural concrete. This is not a feature of all primary aggregates nor one that secondary and recycled aggregates can generally meet.
- Objects to the proposed quarry extension due to direct loss of priority habitat and biodiversity, and impacts on the Oaken Wood LWS with impacts that cannot be adequately justified or mitigated. - NPPF paragraph 180(d), which states that development leading to the loss or deterioration of irreplaceable habitats should be refused unless wholly exceptional reasons exist, alongside a suitable compensation strategy. Further argues that approval of the extension would lead to an unacceptable loss of irreplaceable habitat and biodiversity. - Notes that 34 hectares of ancient woodland were lost during a previous quarry extension, and the current nomination could result in approximately 63 hectares being impacted in total.	Buglife	- This is recognised in the technical assessment. The NPPF policy test and local plan policy requirements have been applied for the Mineral Sites Plan work, which recognises part of the site as PAWS and a Local Wildlife Site. A PAWS site is where native trees were cleared and replaced by non-native plantations, in this case a sweet chestnut managed woodland, and is recognised as an irreplaceable habitat including the woodland features as undisturbed soil, ground flora and fungi. It is acknowledged that the development (quarrying for aggregate minerals) would result in the loss of PAWS. Any PAWS losses as a consequence of quarrying have to be justified by “wholly exceptional reasons”, together with a suitable compensation strategy. The assessment of whether wholly exceptional reasons exist considers economic, social and environmental matters. This includes the need to plan for a steady and adequate supply of primary land-won aggregates to meet defined markets over the plan period and the socio-economic and environmental benefits that accrue from maintaining a local supply. The Council is satisfied that wholly exceptions reasons exist and a suitable compensation strategy can be demonstrated, and so the DM 2 policy test could be satisfied. A separate report addressing this matter has been prepared. - Allocation is dependent upon a suitable compensation strategy, that provides for a net gain of some 112ha of new native planting and enhanced management of existing woodland. The total woodland creation and enhancement equate to 154 ha, which would be created compared to the 42ha woodland (including 41ha of PAWS) which is assumed would be lost to facilitate mineral working. This equates to a 266% increase of native mixed species woodland (by creation and enhancement). The strategy also includes the translocation of PAWS soils. The compensation strategy is considered acceptable to satisfy the policy test. - Planning permission for the current working area of Hermitage Quarry was granted by a Planning Inspector at a public inquiry having been satisfied that the need for the mineral development outweighed the policy protection for the woodland.
- Concerns were partly addressed by Gallagher maintaining public access to woodland areas outside the quarry boundary. - Further expansion into the woodland would reduce informal public access. The extension would directly impact the PROW network. Emphasis is placed on securing suitable diversions for affected equestrian PROWs (MR496, KM13 and MR108). - Maintaining onward connectivity to surrounding routes (MR617, MR618, MR619, KM333, KM6 and KM7) is considered essential. - The area is highly valued by horse riders west of Maidstone as a rare opportunity for off-road riding. Protection of access for horse riders and other users is seen as critical.	British Horse Society	- Noted. - The impact upon public right of ways has been considered. The affected bridleway will require a suitable temporary diversion. The details of which are a matter for any detailed planning application stage. - Noted. - Noted.

• Early planning with the quarry operator is encouraged to safeguard recreation and access provision.		• Noted.
• The proposal threatens over 50 hectares of irreplaceable protected ancient woodland, which is vital for biodiversity complexity, ecological value, and cultural significance. Loss of this habitat would damage biodiversity and limit scientific understanding of complex ecosystems. • The loss of ancient woodland is irreversible, and compensatory planting cannot replicate its ecological complexity. • The County Council recognised a climate and environmental emergency in 2019 and committed to increasing tree cover in 2022; the proposed extension conflicts with these commitments and weaken climate change action. • The Environment Act (2021) introduced mandatory Biodiversity Net Gain (BNG) from late 2023, which the proposal is seen to undermine. • Ancient woodland provides essential ecosystem services, including carbon sequestration, air and water purification and flood mitigation. • Protecting Oaken Wood is considered essential for scientific research, sustainable living, and for future generations to use as a reference for such study.	EcoSentience (on behalf of residents)	• This is recognised in the technical assessment. The NPPF policy test and local plan policy requirements have been applied for the Mineral Sites Plan work, which recognises part of the site as PAWS and a Local Wildlife Site. A PAWS site is where native trees were cleared and replaced by non-native plantations, in this case a sweet chestnut managed woodland, and is recognised as an irreplaceable habitat including the woodland features as undisturbed soil, ground flora and fungi. It is acknowledged that the development (quarrying for aggregate minerals) would result in the loss of PAWS. Any PAWS losses as a consequence of quarrying have to be justified by “wholly exceptional reasons”, together with a suitable compensation strategy. The assessment of whether wholly exceptional reasons exist considers economic, social and environmental matters. This includes the need to plan for a steady and adequate supply of primary land-won aggregates to meet defined markets over the plan period and the socio-economic and environmental benefits that accrue from maintaining a local supply. The Council is satisfied that wholly exceptions reasons exist and a suitable compensation strategy can be demonstrated, and so the DM 2 policy test could be satisfied. A separate report addressing this matter has been prepared. • Allocation is dependent upon a suitable compensation strategy, that provides for a net gain of some 112ha of new native planting and enhanced management of existing woodland. The total woodland creation and enhancement equate to 154 ha, which would be created compared to the 42ha woodland (including 41ha of PAWS) which is assumed would be lost to facilitate mineral working. This equates to a 266% increase of native mixed species woodland (by creation and enhancement. The strategy also includes the translocation of PAWS soils. The compensation strategy is considered acceptable to satisfy the policy test. • The intention is to progressively restore the site and increase the overall woodland (to a 266% increase of native mixed species woodland (y creation and enhancement) coverage with native broad leaf species (the current PAWS designated Ancient Woodland area is predominantly chestnut coppice woodland, which is actively managed). This would deliver new habitats as part of the progressive restoration of the site as well as increasing the carbon sequestration from a net increase in broad leaf native species woodland coverage. • Biodiversity Net Gain (BNG) is a mandatory requirement for planning permission. Mitigation of impacts on biodiversity on the non-PAWS part of the site will be subject to BNG. • Proposed native woodland compensation includes increased woodland coverage that will assist carbon sequestration from the air and water purification and flood mitigation (as in the woodlands acting as a sustainable drainage system rather than allowing simple run off in heavy rainfall events) to be increased overall. • Noted
• Construction methods using local materials are environmentally friendly than importing materials. • Reduces stress on road and rail infrastructure by	Local Residents (in support) (x396)	• Noted, importation increases carbon emissions and has an economic cost compared to more local supply as land-won in Kent. • Importation via wharves and rail depots would also require potential increases in HGV mileage to distribute the

avoiding the wholesale importation of building materials into Kent. • The quarry acts as a valuable local asset, providing local employment opportunities and skills. • Maintains the tradition of quarrying and building with Ragstone. • GAL support the local community through charity work and sponsorship at Maidstone Hospital. • The proposal is a sustainable solution for meeting the hard rock requirements in the South East. • Kentish Ragstone is vital for the restoration of the County's heritage assets. • GAL have a proven track record of successful ecological restoration. • Use of a brownfield site to meet South England's hard rock requirements without disturbing the Green Belt.		aggregate materials than maintaining land-won supply. Though this is a complex matter that cannot be easily predicted given the uneven distribution of aggregate importation points and construction market activities. • Noted. • Noted, Kentish Ragstone is a local resource that is represented in the built vernacular of the area and beyond, including important heritage structures such as the Archbishops Palace (Maidstone), Rochester Castle, Tower of London etc. • Noted. • This estimation of Kent's hard (crushed) rock need as aggregate is based on sales patterns and available land-banks of permitted reserves. This includes the quantity that is exported out of Kent into the wider Southeast. • Noted, the Boughton Group of the Hythe Formation, that the nominated site is located upon is able to supply dimension stone of sufficient size and quality to be used in the maintenance and restoration of Kent's heritage assets and those beyond Kent such as the Tower of London. • The land nominated for mineral development is not 'brown field' land, as it has not been previously developed, though managed as a chestnut coppice woodland. Green Belt designated land can be used for mineral development where it would not compromise the function of the designation, including maintaining 'openness' of the area. • This consideration does not apply to the nominated site as it lies outside the designated Green Belt.
Statutory Consultees		
• East Sussex does not have hard rock quarries and relies on imports. The development of additional hard rock extraction in Kent is supported in principle, as it could help with the supply to East Sussex. • The potential for rail exports from Hermitage Quarry is noted as preferable to reduce carbon emissions. • Amendments to KMWLP Policy CSM2 relating to quantity of aggregate mineral and addition of nominated hard rock site to Kent Mineral Sites Plan. There are no hard rock quarries or provision for land-won hard rock in the East Sussex, South Downs and Brighton & Hove (ESSDB&H) Waste and Minerals Local Plan as there are no geological resources in the Plan Area. Hard rock, often in the form of crushed rock, is currently imported to the ESSDB&H Plan Area via rail heads and wharves. The Collation of the Results of the 2023 Aggregate Minerals Survey for Great Britain (2025) states that of the 568,000t of	East Sussex County Council	• The calculation of need for further land-won hard rock takes account of any export patterns from Kent to neighbouring areas with different geologies. • Noted, the lack of rail connectivity is a feature of the nominated site, though this would not exclude rail transshipment from rail depots if this were viable commercially. • Noted, the 10-20% supply of hard rock from Kent to East Sussex will have been captured in the sales that informed the annual provisional rate (APR) as detailed in the Local Aggregate Assessment (LAA).

hard rock consumed in the ESSDB&H Plan Area, 10-20% is supplied from Kent.		
No comments	West Sussex County Council	Noted
Support the nomination of an additional hard rock site as the site would help reduce reliance on hard rock imports.	Surrey County Council	Noted
- The Sustainability Appraisal (SA) identifies that the site overlies aquifers within Source Protection Zone 3 and is an area of groundwater vulnerability. - Protection of potable water supply is a significant concern, particularly in relation to planned growth in Tonbridge and Malling, and any risk to water supply should be avoided. - The SA notes that the 2022 planning permission limits HGV movements to: - A daily maximum combined total of 800 HGV movements within a single calendar month - A maximum of 900 HGV movements on any one day - Since that permission, there has been substantial additional residential development in the area, including: - Around 300 dwellings off Oak Apple Lane near Hermitage Quarry - Approximately 1,900 dwellings granted or under consideration in Tonbridge and Malling - The County Council is requested to reconsider the cumulative traffic impacts arising from the nominated quarry site in light of this additional development. - The consultee confirms that earlier consultation comments remain relevant. - Continued significant concern is expressed regarding the nomination/allocation of land south and west of Hermitage Quarry for hard rock extraction, due to: - Potential loss of priority habitat - Loss of ancient woodland	Tonbridge and Malling Borough Council	- Noted. The promoted site's maximum depth of extraction is intended to be above recorded groundwater level and in accordance with advice from Environment Agency. Infilling the quarried void would be subject to the Environment Agency's waste management permitting requirements to prevent pollution by controlling what waste inputs are permitted. - The EA would require that the quarrying operations and restoration of the site safeguard water resources in the underlying aquifer. This could be secured via planning condition and strengthened development management criteria. No objection in principle has been raised to the allocation. - HGV movements would be the subject of any detailed planning application. The promoter's intention is to maintain current levels of output, which would result in a continuation of current HGV movement controls, including peak hour restrictions. These would be secured by strengthened development management criteria in the Sites Plan and planning conditions. - Noted. The County Council is aware of the local development pressure and has considered this in its overall assessment. Continuation of the level of extraction on this has been assessed as acceptable, with impacts being addressed in strengthened development management criteria and secured by planning conditions. - Cumulative impacts have been considered and are acceptable in principle. The matter will be assessed in further detail as part of any planning application. - Noted. - This is recognised in the technical assessment. Part of the site is recognised as ancient woodland, being a Plantation on Ancient Woodland Site (PAWS) and a Local Wildlife Site. A PAWS site is where native trees were cleared and replaced by non-native plantations, in this case a sweet chestnut managed woodland, and is recognised as an irreplaceable habitat including the woodland features as undisturbed soil, ground flora and

○ Adverse impacts on biodiversity • In accordance with NPPF 2024 paragraphs 192 and 193, it is considered that wholly exceptional reasons have not been demonstrated to justify allocation of the site. • KCC is encouraged to continue exploring alternative, more suitable sites, including: ○ Further engagement with landowners ○ Undertaking an additional call for sites exercise • Note that the RAG Assessment identifies the following Amber and Red-Amber issues: ○ Nature Conservation and Geodiversity (Red-Amber) - Site is within or could have unacceptable adverse impact on national designations where there is no persuasive evidence that the benefits of the development outweigh the impacts. Site is within or could have unacceptable adverse impact on local designations where there is no evidence the impacts can be mitigated or compensated such that there is net benefit. The site is considered to have a significant adverse effect on national designations. ○ Air Quality (Amber) - The site is near to an AQMA or may have adverse impacts on air quality that is capable of mitigation. ○ Soil Quality (Amber) - Small parts of the site contain best and most versatile land which would be moderately impacted by the development. ○ Public Rights of Way (Red-Amber) - The site is likely to cause major adverse impact upon the PRow network, but this could be satisfactorily diverted and/or extensively mitigated.		fungi. It is acknowledged that the development (quarrying for aggregate minerals) would result in the loss of PAWS. Any PAWS losses as a consequence of quarrying have to be justified by “wholly exceptional reasons”, together with a suitable compensation strategy. The assessment of whether wholly exceptional reasons exist considers economic, social and environmental matters. This includes the need to plan for a steady and adequate supply of primary land-won aggregates to meet defined markets over the plan period and the socio-economic and environmental benefits that accrue from maintaining a local supply. The Council is satisfied that wholly exceptions reasons exist and a suitable compensation strategy can be demonstrated, and so the DM 2 policy test could be satisfied. A separate report addressing this matter has been prepared. • The compensation would provide a net gain of some 112ha of new native planting and enhanced management of existing woodland. The total woodland creation and enhancement equate to 154 ha, which would be created compared to the 42ha woodland (including 41ha of PAWS) which is assumed would be lost to facilitate mineral working. This equates to a 266% increase of native mixed species woodland (by creation and enhancement). The strategy also includes the translocation of PAWS soils. The compensation strategy is considered acceptable to satisfy the policy test. • For a site to be allocated it has to be deliverable. In response to the two Call for Sites exercises, only the extension to Hermitage Quarry was promoted. In terms of potential alternatives to meet the identified need, the County Council has also reviewed the sites that had been previously examined by the Planning Inspectorate and considered the impact of substituting land-won aggregate hard rock supply with greater importation over wharves and rail depots. • Noted. The initial RAG assessment work has been considered further as part of the detailed technical assessment work. In principle the impacts identified are considered acceptable, subject to strengthened development management criteria and controls via future planning conditions. The Council is satisfied that the policy test of wholly exceptional reasons and a suitable compensation strategy as set out above satisfy the policy test,

○ Transport (Amber) - There are moderate issues with access to the Primary Route Network and Secondary Route Network. The identified impacts could be mitigated through planning obligations. ○ Services and Utilities (Red-Amber) - The site contains services or utilities which could require major mitigation through rerouting, or the location of cables/pipes hampers the ability to maximise yield from the site. ○ Health and Amenity (Red-Amber) - The site could cause major adverse impact to health and amenity from blasting in the absence of a high levels of mitigation as demonstrated. The site could cause a major impact to adjacent land uses. • Tonbridge and Malling Borough Council (TMBC) requests further information, including: An ecological and biodiversity assessment, an arboricultural survey and Natural England's comments, if available		• As a statutory consultee Natural England's comment will be available as background evidence in any Regulation 19 public consultation. The detailed preliminary ecological survey work undertaken by the promoter of the nominated site is entitled Ecological Assessment. Ecology Solutions Limited, March 2024, and will be present as a background document in any Regulation 19 public consultation. As will the County Council's consultant's ecological assessment entitled HERMITAGE QUARRY ENVIRONMENTAL SUPPORT Ecology June 2026 by WSP. In addition, any planning application would have to include further detailed ecological appraisals to support the applicant's proposal that would be widely consulted upon including with Tonbridge and Malling Borough Council and Natural England. Details regarding the development of the site would have to accord with the strengthened Mineral Sites Plan Development Management Criteria on biodiversity. This includes a strategy to compensate losses in ancient woodland, details of BNG on areas outside PAWS ancient woodland designation, mitigation buffer zones and translocation of replacement ancient woodland soils and ongoing monitoring requirements.
• Original Hermitage Quarry has already seen several extensions over the last 2 decades- the last one in 2013 resulting in 14% loss of Oaken Wood ancient woodland. • As per para 186c) of the NPPF, the ancient woodland should be protected, and development should be refused unless there are wholly acceptable reasons and a suitable compensation strategy.	Maidstone Borough Council (MBC)	• Noted. The Secretary of State considered and authorised the loss of earlier parts of Oaken Wood. The KWWLP 2024-2039 recognises the need for further hard rock. • This is recognised in the technical assessment. The NPPF policy test and local plan policy requirements have been applied for the Mineral Sites Plan work, which recognises part of the site as PAWS and a Local Wildlife Site. A PAWS site is where native trees were cleared and replaced by non-native plantations, in this case a sweet chestnut managed woodland, and is recognised as an irreplaceable habitat including the woodland features as undisturbed soil, ground flora and fungi. It is acknowledged that the development (quarrying for aggregate minerals) would result in the loss of PAWS. Any PAWS losses as a consequence of quarrying have to be justified by "wholly exceptional reasons", together with a suitable compensation strategy. The assessment of whether wholly exceptional reasons exist considers economic, social and environmental matters. This includes the need to plan for a steady and adequate supply of primary land-won aggregates to meet defined markets over the plan period and the socio-economic and environmental benefits that accrue from maintaining a local supply. The Council is satisfied that wholly exceptions reasons exist and a suitable compensation strategy can be demonstrated, and so the DM 2 policy test could be satisfied. A separate report addressing this matter has been prepared.

- A larger part of Oaken Wood is LWS of which its importance is recognised in the NPPF and Maidstone Local Plan Review 2021-38. - The nominated extension is in close proximity to Oaken Wood SSSI which was designated due to its key geomorphological interest. MBC is concerned that the extraction of hard rock may lead to the deterioration of the geomorphological site.		- Allocation is dependent upon a suitable compensation strategy, that provides for a net gain of some 112ha of new native planting and enhanced management of existing woodland. The total woodland creation and enhancement equate to 154 ha, which would be created compared to the 42ha woodland (including 41ha of PAWS) which is assumed would be lost to facilitate mineral working. This equates to a 266% increase of native mixed species woodland (by creation and enhancement). The strategy also includes the translocation of PAWS soils. The compensation strategy is considered acceptable to satisfy the policy test. - The Site of Special Scientific Interest (SSSI) is a geomorphological feature. There is a buffer between the SSSI, and the area proposed to be worked, and therefore there would no direct impacts. At the planning application stage, a detailed assessment of the potential impacts of blasting, including on the SSSI, will be undertaken and the boundary of the working area will be adjusted as necessary to minimise unacceptable adverse impacts. The development management criteria for this site have been updated in the Pre-Submission Draft Plan to ensure this matter will be properly accounted for.
- Considered too distant to have any strategic impact on Tunbridge Wells Borough in terms of environment, landscape, traffic, or noise and dust. - Tunbridge Wells Borough Council is not aware of any direct impacts from the existing quarry operations. - Concern is raised that the Nature Conservation and Geodiversity rating in the initial RAG Assessment should be upgraded from Red-Amber to Red.	Tunbridge Wells Borough Council	- Noted. - Noted. - Noted. The initial RAG assessment work has been considered further as part of the detailed technical assessment work. In principle the impacts identified are considered acceptable, subject to development management criteria and controls via future planning conditions. The Council is satisfied that the policy test of wholly exceptional reasons and a suitable compensation strategy as set out above satisfy the policy test,
- Disagrees with the proposed changes to the requirements for hard rock. - Notes the proposed allocation but does not wish to comment on the suitability of the nominated hard rock site at this stage. - Notes the indicative development management criteria but does not wish to comment at this stage.	Gravesham Borough Council	- KMWLP Policy CSM2 details the aggregate landbanks and mineral requirements as needed for the Plan period to 2024-39. The methodology was the subject of the Plan's examination. The policy allows for the update of requirements based on the most recent LAA data. The LAA2025 (2024 data) demonstrates that over the KMWLP period there will be some 19.9mt shortfall of hard rock for aggregate production to 2039. The evidence supporting the need for any allocation is derived from the Aggregate Mineral (AM) survey that is undertaken annually and demonstrates available reserves and sales. The data is used to inform if further allocations is required over the Plan period. - Noted. - Noted.
Concern raised about negative impacts on both the environment and local quality of life.	Barming Parish Council	Noted. In principle the impacts arising from the continuation of quarry operations at the site are considered acceptable, subject to the relevant strengthened development management criteria and tailored planning conditions. The operator's intention would be to continue operations at the current extraction rate, which is mitigated by current planning conditions.

• Quarry expansion would destroy valuable natural habitats, including the loss of around 80,000 trees. • Destruction of undisturbed woodland soils would release significant greenhouse gases, worsening the climate emergency acknowledged by KCC in May 2019. • Oaken Wood provides a sustainable supply of timber for construction and agriculture, along with unique habitats that cannot be replaced once lost. • The proposal would further reduce green space already being lost to housing development along Hermitage Lane and the A20 corridor. • Finds it unacceptable that no alternative hard rock quarry sites have been explored. • Acknowledges the economic and employment benefits of quarry expansion but considers environmental harm to be substantial.		• Allocation is dependent upon a suitable compensation strategy, that provides for a net gain of some 112ha of new native planting and enhanced management of existing woodland. The total woodland creation and enhancement equate to 154 ha, which would be created compared to the 42ha woodland (including 41ha of PAWS) which is assumed would be lost to facilitate mineral working. This equates to a 266% increase of native mixed species woodland (by creation and enhancement). The strategy also includes the translocation of PAWS soils. The compensation strategy is considered acceptable to satisfy the policy test. • The removal of the chestnut coppice tree cover of the PAWS and the translocation of soils could have a carbon loading element on the environment in the short term. The County Council has concluded that the NPPF “wholly exceptional reasons” test in regard to the PAWS designation has been met. The restoration of any quarried area back to woodland and the creation of new woodland on agricultural land could potentially have carbon gains, being a greater carbon sink over the long term. Moreover, the allocation of the site would facilitate aggregate from a Kent land-won resource, resulting in far less carbon emissions that would occur if an equivalent amount of aggregate were to be imported over the plan period. Importation of aggregate supply would have a greater impact on carbon loading and the Government’s policy for Net Zero by 2050 • Allocation is dependent upon a suitable compensation strategy, that provides for a net gain of some 112ha of new native planting and enhanced management of existing woodland. The total woodland creation and enhancement equate to 154 ha, which would be created compared to the 42ha woodland (including 41ha of PAWS) which is assumed would be lost to facilitate mineral working. This equates to a 266% increase of native mixed species woodland (by creation and enhancement). The strategy also includes the translocation of PAWS soils. The compensation strategy is considered acceptable to satisfy the policy test. • The impact from housing development at other locations is noted, although not directly relevant to the mineral considerations. With the exception of bridleway MR108 which crosses the site allocation and a byway (unaffected), the land is in private ownership and has no general right of public access. The landowner currently provides access to the community via a number of permissive paths. The bridleway would need to be temporarily relocated and reinstated upon completion of the development, as with the current quarrying activity, the operator advises that the permissive paths are intended to remain accessible being closed as necessary as works progress. • For a site to be allocated it has to be deliverable. In response to the two Call for Sites exercises, only the extension to Hermitage Quarry was promoted. In terms of potential alternatives to meet the identified need, the County Council also reviewed the sites that had been previously examined by the Planning Inspectorate and considered the impact of substituting land-won aggregate hard rock supply with greater importation over wharves and rail depots. • The environmental impact is material planning considerations, significantly the loss of ancient woodland of a PAWS designation. A PAWS site is where native trees were cleared and replaced by non-native plantations, in this case a sweet chestnut managed woodland, and is recognised as an irreplaceable habitat including the woodland features as undisturbed soil, ground flora and fungi. It is acknowledged that the development (quarrying for aggregate minerals) would result in the loss of PAWS. Any PAWS losses as a consequence of quarrying have to be justified by “wholly exceptional reasons”, together with a suitable compensation strategy. The assessment of whether wholly exceptional reasons exist considers the economic, social and environmental matters. This includes the need to plan for a steady and adequate supply of primary land-won aggregates to meet defined markets over the plan period and the socio-economic and environmental benefits that accrue from maintaining a local supply. The Council is satisfied that wholly exceptions reasons exist and a suitable compensation strategy can be demonstrated, and so the DM 2 policy test could be satisfied. A separate report addressing this matter has been prepared.

Requests that KCC explore alternative, more sustainable development options that minimise impacts on the environment and community.		In response to the two Call for Sites exercises, only the extension to Hermitage Quarry was promoted by an operator/landowner. In terms of potential alternatives to meet the identified need, the County Council also reviewed the sites that had been previously examined by the Planning Inspectorate and considered the impact of substituting land-won aggregate hard rock supply with greater importation over wharves and rail depots.
- The proposal would result in further loss of ancient woodland due to ragstone quarrying. - Quarrying could extend close to properties at Sweets Land and Easterfields, causing noise disturbance and vibration from blasting. - The development would lead to loss of countryside in the Medway Gap, an area already under pressure from housing development. - Public bridleway MR108 would be affected, impacting an important off-road route used by nearby riding stables. There is a strong need to protect off-road riding routes, which are limited in the area. - A full assessment of existing flora and fauna the biodiversity should be undertaken before any decision is made, including the impacts on these characteristics from quarrying activities. - A complete historic and archaeological survey should be carried out. - Particular attention should be given to identifying and protecting especially old trees within the ancient woodland. - Evidence is requested to demonstrate successful reinstatement of woodland topsoil following previous	East Malling and Larkfield Parish Council	- This is recognised in the technical assessment. Part of the site is recognised as ancient woodland, being a Plantation on Ancient Woodland Site (PAWS). A PAWS site is where native trees were cleared and replaced by non-native plantations, in this case a sweet chestnut managed woodland, and is recognised as an irreplaceable habitat including the woodland features as undisturbed soil, ground flora and fungi. It is acknowledged that the development (quarrying for aggregate minerals) would result in the loss of PAWS. Any PAWS losses as a consequence of quarrying have to be justified by “wholly exceptional reasons”, together with a suitable compensation strategy. The assessment of whether wholly exceptional reasons exist considers economic, social and environmental matters. This includes the need to plan for a steady and adequate supply of primary land-won aggregates to meet defined markets over the plan period and the socio-economic and environmental benefits that accrue from maintaining a local supply. The Council is satisfied that wholly exceptions reasons exist and a suitable compensation strategy can be demonstrated, and so the DM 2 policy test could be satisfied. A separate report addressing this matter has been prepared. - Quarrying impacts such as dust and noise (including vibration) are material concerns and subject to mitigation that can be secured via strengthened development management criteria and future planning conditions. These matters will be considered further at any detailed planning application stage. - The nominated site for quarry operations would be progressively restored to woodland. - Noted. The PROW would need to be temporally diverted and reinstated at end of site restoration. Any re-routing would require the support of the Public Rights of Way officer. - Sufficient detail has been considered at the plan making stage to establish that the development is acceptable in principle. Furthermore, detailed assessment would be required at the planning application stage. - Archaeological assessment has been undertaken in consultation with English Heritage. Detailed assessment conducted by Wessex Archaeology found that the site had limited potential. At planning application stage, further detailed assessment on archaeology and any heritage assets would be required in accordance with the Mineral Sites Plan Development Management Criteria, with mitigation secured by planning condition. - The Woodland Trust's Ancient Tree Inventory does not record any veteran trees on site. It recognises one notable oak as a mature tree. A Tree Preservation Order (TPO) is present on part of the site. This was put into force to maintain the sweet chestnut coppice woodland. Any effects on trees subject to a TPO would be assessed through the planning application process and controlled through any permission and associated conditions. - The Secretary of State's earlier decision on the compensation package which involved the translocation of soils is

quarrying, to prove the feasibility of restoration.		now showing signs of success. However, the precise compensation details would be part of any detailed planning application, with woodland habitat creation as compensation secured through strengthened development management criteria and planning conditions,
• Questions whether KCC is the appropriate body to judge the site's merits, arguing approval should wait for Planning Inspectorate consideration. • Any diversion of existing PROW) must be to newly established, permanent routes. Calls for legally enforceable, permanent commitments from the site owner to existing and newly established paths and dedicate a significant proportion of reinstated land for community use. • Powerline diversion proposals must consider scientific evidence on potential long-term health impacts of living near overhead powerlines. Rerouted paths could increase risk to residents living near the new alignment. • Blast vibration reports are criticised for: ○ Not showing precise blast locations ○ Lacking clear descriptions of weather conditions during blasting ○ Missing scales on particle velocity graphs ○ Having unclear y-axis labelling • Concerns raised about whether KCC has sufficient expertise when reviewing blast monitoring data and ensuring compliance with KCC's <i>Guidance on blasting ragstone quarries in Kent (May 2021)</i>. Air overpressure impacts could increase by up to 18 dB for homes in Teston.	Teston Parish Council	• As the Mineral Planning Authority, the County Council is required to prepare a Mineral Sites Plan that is independently examined by the Planning Inspectorate. • Public rights of way (PROW) are required to be maintained and reinstated by law. Other than the bridleway through the site, the land is private and the public has accessibility through permissive paths. This is intended to continue. • If required, the diversion of the power lines would be assessed against the statutory processes, including health impacts on local communities. • Noted – this is a matter for any detailed planning application stage to demonstrate in accordance with the strengthened Mineral Sites Plan Development Management Criteria and Government guidance on the control and monitoring of blasting in quarry operations. Moreover, quarrying impacts such as vibration are material concerns, and subject to mitigation that can be secured via strengthened development management criteria and future planning conditions. These matters will be considered further at any detailed planning application and in accordance with best practice and guidance. Assessment is undertaken by experienced planning officers, with input from technical advisors as necessary. • The guidance contained in <i>Guidance on blasting ragstone quarries in Kent (May 2021)</i> focusses on minimising environmental impacts and protecting neighbours through regulated, monitored blasting schedules. The key practices include managing vibration, controlling airborne noise and utilising specific blasting sequences to reduce impacts, particularly to local residents.
• Objects the proposal as it is viewed as out of touch with the climate crisis, the irreplaceability of ancient woodland, and the rare/diverse species that inhabit Oaken Wood	Fawkham Parish Council	• The County Council, as the Mineral Planning Authority (MPA) is required by the NPPF to have planning policies to ensure a steady and adequate supply of aggregate minerals to meet specific market demands. In Kent this includes aggregate formed from hard (crushed) rock. • This concern is recognised in the technical assessment. Part of the site is recognised as ancient woodland, being a Plantation on Ancient Woodland Site (PAWS). A PAWS site is where native trees were cleared and replaced by non-native plantations, in this case a sweet chestnut managed woodland, and is recognised as an irreplaceable habitat including the woodland features as undisturbed soil, ground flora and fungi. It is acknowledged that the development (quarrying for aggregate minerals) would result in the loss of PAWS. Any PAWS losses as a consequence of quarrying have to be justified by “wholly exceptional reasons”, together with a suitable compensation strategy. The assessment of whether wholly exceptional reasons exist considers economic, social and environmental matters. This includes the need to plan for a steady and adequate supply of primary land-won aggregates to meet defined markets over the plan period and the socio-economic and environmental benefits that accrue from maintaining a local supply. The Council is satisfied that wholly exceptions

		reasons exist and a suitable compensation strategy can be demonstrated, and so the DM 2 policy test could be satisfied. A separate report addressing this matter has been prepared.
- Hermitage Quarry site has good access to the Strategic Highway Network, and schemes are coming forward at Coldharbour Roundabout and in terms of the Whitepost Field link road which will further improve access, but the route is very sensitive at peak times. The local area has seen considerable new housing development over the past few years, and more is anticipated. - Suggest an Amber category would be more appropriate with conditions to cap HGV movements during peak traffic periods.	KCC Highways	Noted
- Public Bridleway MR108 runs through the site, raising concerns about impacts on a key strategic link across the wider area. - Although PROW diversions are mentioned, no details are provided on the proposed legal mechanisms. - Any diversion would need to be formally agreed with the PROW and Access Service as the Highway Authority for PROW.	KCC PROW	Noted
- Any future allocation/ application/consent is clear that the works/traffic movements represent a continuation of, rather than being in any way additional to, current operations. The conditions cover all activities at the site and the operational working plans/ travel plans etc, plan for and achieve what realistically can be by way of sustainable travel, and minimising single use one-way trips if vehicles could reasonably perform multiple tasks and hence be loaded for inward and outward movements. - The supporting evidence is considered suitably up-to-date, relevant and robust. This should include not only including WEBTAG commitments but also appropriately covering/ having narrative in relation to other material factors. For example, in addition to the schemes you mention at Coldharbour Roundabout and the Whitepost Field link road, the A20 London Road/ Coldharbour Road junction has been improved by KCC but is likely to be subject to further works assuming the Costco proposals come forward. Therefore, at least having sensitivity testing of "known knowns" would assist to see if there are any	National Highways	- The County Council highways authority remains of the view that sufficient highway capacity exists to allow the continuation of present levels of generated HGV traffic. The site has good access to the Strategic Highway Network, and schemes are coming forward at Coldharbour Roundabout and in terms of the Whitepost Field link road which will further improve access. However, the route is very sensitive at peak times, the local area attracted housing development over the past few years, and more is anticipated in the future. It may be appropriate to cap HGV movements during peak traffic periods with any planning permission conditions. - It is not considered necessary that further sensitivity testing for additional potential highways or development scenarios should be undertaken to inform the County Council Highway Authority view that continued quarrying at the Hermitage Quarry site may be acceptable. The key highways mitigation here is to continue with a robust cap on HGV movements, particularly for the peaks. Costco is still a pre app and they will need to present us with evidence as to their impact and potential mitigation. Coldharbour roundabout and A20/ London Road Coldharbour junction are the same scheme which was completed last year.

cumulative issues. Whether and who might need to mitigate them would be separate matter.		
Draws attention to the following policies from the South East Inshore Marine Plans: • SE-INF-1: Supports land-based infrastructure that facilitates marine activity. • SE-INF-2: Alternative development at existing safeguarded landing facilities will not be supported. • SE-DD-1: Other activities will not be supported in areas of authorised dredging unless compatible with dredging activity. • SE-DD-2: Developments causing significant adverse impacts on licensed disposal areas are discouraged. • SE-DD-3: Disposal of dredged material must demonstrate compliance with the waste hierarchy. • SE-PS-1: Supports proposals compatible with current and future sustainable port and harbour activity. • SE-PS-4: Supports proposals that promote sustainable coastal or short-sea shipping as alternatives to road, rail or air transport. • SE-HER-1: Proposals should conserve and enhance heritage assets. Where harm is unavoidable, mitigation must be demonstrated, and public benefits must outweigh harm. • SE-EMP-1: Supports proposals that increase marine-related employment, particularly where they create jobs in deprived areas. • SE-CC-1: Supports developments that enhance habitats, flood defence or carbon sequestration. Where adverse impacts occur, proposals must avoid, minimise, mitigate, or compensate and deliver environmental net gains. • SE-CC-2: Requires proposals to demonstrate long-term resilience to climate and coastal change. • SE-CC-3: Proposals likely to cause significant adverse impacts on coastal change should not be supported.	Marine Management Organisation (MMO)	• Noted. The majority of the MMO policy comments relate to the now adopted KMWLP 2024-39 and its established policy framework.
• An initial assessment indicates that development south and west of Hermitage Quarry would have only limited minor adverse impacts on nearby heritage assets. • If the site were allocated, a more detailed archaeological and heritage impact assessment would be required before any development takes place. • KCC's Heritage Team is considered well placed to advise on these matters. Additional advice should also be sought from conservation officers at	Historic England	• Noted. • This would be a requirement as part of any planning application process. Archaeological assessment has been undertaken by the County Council and in consultation with English Heritage. Detailed assessment conducted by Wessex Archaeology found that the site had limited potential. If any planning application were made, further detailed assessment on archaeology and any heritage assets would be required and any mitigation secured by condition. • The County Council, in its heritage conservation responsibilities regards further supplies of appropriately sized and graded dimension stone from the Hythe Formation as important for the continuation or the conservation and preservation of historic structures in Kent and beyond constructed of Kentish Ragstone. Both Tonbridge & Malling

Tonbridge & Malling Borough Council (TMBC) and Maidstone Borough Council (MBC).		Borough Council (TMBC) and Maidstone Borough Council (MBC) have been consulted and have not raised any matters that contradict the County Council's Conservation Officer's view.
- Oaken Wood Site of Special Scientific Interest (SSSI) it is unclear if the nominated site boundary overlaps the SSSI, direct and indirect impacts are likely to result from the development of the nominated site NE would expect the - County Council to fully exhaust all alternative means of delivery of the identified hard rock requirements including the use of recycled materials in meeting the identified needs set out in the NPPF at Section 17, para 210 and 211. - The NPPF para.180 b) states that development within or outside a SSSI that is likely to cause an adverse effect (individually or in combination with other developments) should normally be refused, the only exception where the benefits in the location clearly outweigh the reason for SSSI status and the broader SSSI network. Policy DM 2 of the adopted KMWP provides strong SSSI protection. If the County Council is minded to proceed a detailed assessment of any direct and non-direct impacts on the features of the SSSI and the SSSI network should be tested through the SA. - The proposed nominated site would coincide with an area of replanted ancient woodland. This is irreplaceable ancient woodland habitat and is afforded strong policy protection by NPPF Section 180 c) that requires development that would result in the loss or deterioration of irreplaceable habitats (such as this is) should be refused unless there are wholly exceptional reasons and a suitable compensatory strategy. Policy DM 2 strategy of the adopted KMWP provides strong protection. Ancient woodland soils even where replanted have the same level of protection as they contain the ancient woodland features, such as undisturbed soil, ground flora and fungi and have the same protection as ancient semi-natural woodland mainly made up of trees and shrubs native to the site, usually arising	Natural England	- The SSSI is a geomorphological feature that demonstrates a Pleistocene "ridge and trough" topography and is beyond the area that would be subject to quarrying operations. There is a buffer between the SSSI, and the area proposed to be worked, and therefore no direct impacts. At the planning application stage, a detailed assessment of the potential impacts of blasting, including on the SSSI, will be undertaken and the boundary of the working area will be adjusted as necessary to minimise unacceptable adverse impacts. The development management criteria for this site have been updated in the Pre-Submission Draft Plan to ensure this matter will be properly accounted for. - The substitution of the nominated site hard rock supply with recycled materials will not provide the required primary aggregate needs identified in the KMWLP. The NPPF (2024) requires land-banks of primary aggregate to be maintained to meet identified needs of a specified type which have a distinct market. Crushed rock requires a defined landbank to meet the requirements for a set of distinct construction markets that include high specification structural concrete uses, that recycled/secondary materials cannot meet. The site is a practical, deliverable indigenous source of hard rock in particular because it is contiguous with existing quarry infrastructure. Other aggregate sources and import infrastructure exist but do not provide the same level of supply certainty. There is no clear acceptable alternative source of Ragstone for heritage purposes. - The NPPF (2024) Section 193 b) does not specify between habitat/ecological SSSI and those that relate to geomorphological SSSI. The reference to KMWLP Policy DM 2 indicates that NE is concerned for the habitat/ecological SSSI. This is not the case in proximity to the nominated site. The proximate SSSI is a geomorphological feature designated in 1985, as it demonstrates a rare Pleistocene "ridge and trough" topography and is outside the area that would be subject to quarrying operations. Therefore, the nominated hard rock site does not affect this feature directly. Indirect effects would be limited to any potential for hard rock quarry operations, potentially from blasting. However, these are highly specified and regulated in terms of what are acceptable limits for peak particle velocities at sensitive receptors outside the quarry boundaries. If quarry operations were conducted in the nominated site area residential property, as sensitive receptors, would be closer than the SSSI feature and therefore, maintenance of appropriate blasting limitations to prevent adverse impacts at these receptors would ensure that the physical state of the geomorphological SSSI would not be impacted in a way that would cause its deterioration, or on any definable geomorphological SSSI network. This matter has been addressed in the SA. The Plan's development management criteria have been updated to address this matter further. - Part of the site is recognised as ancient woodland, being a Plantation on Ancient Woodland Site (PAWS. A PAWS site is where native trees were cleared and replaced by non-native plantations, in this case a sweet chestnut managed woodland, and is recognised as an irreplaceable habitat including the woodland features as undisturbed soil, ground flora and fungi. It is acknowledged that the development (quarrying for aggregate minerals) would result in the loss of PAWS. Any PAWS losses as a consequence of quarrying have to be justified by "wholly exceptional reasons", together with a suitable compensation strategy. The assessment of whether wholly exceptional reasons exist considers economic, social and environmental matters. This includes the need to plan for a steady and adequate supply of primary land-won aggregates to meet defined markets over the plan period and the socio-economic and environmental benefits that accrue from maintaining a local supply. The Council is satisfied that wholly exceptions reasons exist and a suitable compensation strategy can be demonstrated, and so the DM 2 policy test could be satisfied. A separate report ('Hermitage Quarry Suitability for Allocation Assessment Report') addressing this matter has been prepared. Progressive restoration and increased overall native species of broad leaf woodland and management, along with the translocation of soils is proposed to demonstrate that a required 'suitable compensation strategy' could

from natural regeneration. If the County Council is minded to proceed to a detailed assessment of any direct and indirect impacts along with methods for avoidance and mitigation should be part of the Plan and be tested through SA and the draft development management criteria. • The Kent Downs Area of Outstanding Beauty (KDAOB) could have their setting affected given the scale of the proposed nominated site. Para. 176 of the NPPF gives great weight to the conserving and enhancing landscape and scenic beauty in National Parks, and AONB (now designated as National Landscapes) designated areas. KMWLP Policy DM 2 similarly affords great weight to be given to conserving the landscape so designated and scenic beauty. The policy also addresses the need to ensure that the setting of this landscape designation. If the County Council is minded to proceed with the allocation of the site, a detailed landscape assessment of the impact, and any mitigation measures proposed, should be provided as part of the future iterations of the Plan and tested through the SA. • The area's soil should be given appropriate weight when considering the nominated site. These are valued as a finite multi-functional resource (as demonstrated in the Natural Environment White Paper: The Natural Choice: securing the value of nature, Defra June 2011) this should be reflected in the Plan. This vision sets out the need to protect soils as an essential part of life, the environment being made up of air, biodiversity, soil and water. Soil safeguarding is essential for securing a range of important ecosystem services and functions, including food production, carbon storage and climate regulation, water filtration, flood management and supporting biodiversity and wildlife including the protection of 'best and most versatile' agricultural land. The NPPF in para. 170,171 and 204 reflect these concerns by stating that when planning authorities are considering land use change, the permanency of the impact on soils is an important consideration. This includes safeguarding the long-term capability of best and most versatile agricultural land (Grades 1,2 and 3). • In summary NE is concerned with the nature and		be prepared at the application stage. Any allocation is dependent upon demonstrating a suitable compensation strategy could be provided, that provides for a net gain of some 112ha of new native planting and enhanced management of existing woodland. The total proposed native woodland creation and enhancement equate to some 154 ha, which would be created compared to the 42ha of non-native woodland (including 41ha of PAWS) which is assumed would be lost to facilitate mineral working. This equates to a 266% increase of native mixed species woodland (by creation and enhancement). The strategy includes the translocation of PAWS soils. The proposed measures are considered acceptable to demonstrate the policy test can be satisfied and has been considered by the Plan's accompanying SA. Details of how a planning application could demonstrate a suitable compensation strategy is expanded upon in the Pre-Submission Draft Plan's strengthened development management criteria. • Since the Regulation 18 consultation, further landscape and visual assessment has been undertaken to inform the Council's consideration of the nominated site. The site is not located within the Kent Downs National Landscape, and the designation lies approximately 4km to the north-west of the site. The assessment has considered the potential for indirect effects on the setting of the National Landscape, including through desk-based visibility analysis. It concludes that, having regard to distance, intervening landform and woodland cover, there is no meaningful visibility between the proposed working area and elevated receptors within the Kent Downs National Landscape, and that significant effects on the setting of the designation are not anticipated. The Council therefore considers that the proposed allocation would not result in unacceptable adverse effects on the Kent Downs National Landscape. Any future planning application would nevertheless need to be supported by a detailed Landscape and Visual Impact Assessment and would be required to demonstrate appropriate mitigation, including phased working, retention of woodland buffers, advance planting, bunding where necessary, and progressive restoration. This matter has been assessed by the SA. The Plan's development management criteria have been updated to address this matter further. • During the excavation phases of the development soil loss will occur, however this will be temporary as the proposed restoration to mainly native broad leaf woodland requires soil and soil health to be maintained. The use of ancient woodland soils translocation as part of this process would be an appropriate part of the restoration methodology and help ensure that overall soil losses are minimised. Prior to excavation other soils would be stripped and stockpiled for use as part of the restoration. The impact on agricultural soils has been considered as part of the assessment. The agricultural land grade of the relatively small non-woodland areas is considered to be Grade 2 (Very good) to Grade 3 (Good to Moderate). The intention is to use these areas for compensatory broadleaf woodland planting to compensate for the loss of ancient woodland (PAWS) soils. Fundamentally it is not the intention to 'lose' any soil as their retention and management would be part of any detailed restoration scheme. The details of which would be the subject of consideration at any planning application stage and informed by the Plans strengthened development management criteria.

scale of the impacts that the nominated site would have and regards the SA may have underestimated these impacts. Ancient woodland habitat is an irreplaceable characteristic; it is not possible to compensate for direct loss of this habitat. It is therefore recommended to the County Council that undertake comprehensive and independent consideration of whether there are alternative sites or sources of material that will avoid or result in lessor overall environmental impacts. Such an assessment should include landscape, nature and geological conservation and soil considerations in addition to the socio-economic impacts of progressing with the nominated site. Once undertaken and if the County Council considers there are exceptional circumstances to justify the allocation and the site proceeds to an allocation in the Plan the SA and Development Management policies should be updated to reflect the results of the impact assessment and any mitigation and compensation measures proposed (whilst acknowledging that it is not possible to compensate for the loss of irreplaceable woodland habitat. As this would accord with the 'avoid, mitigate, compensate' hierarchy element of the NPPF.		The detailed technical assessment has considered the relevant environmental, social and economic elements relating to the potential allocation of the nominated site. This includes internal and external specialist advice and consultation with statutory consultees and relevant interested parties and the wider public. This included a detailed re-appraisal of the exercise conducted in the past to identify suitable sites within the Hythe Formation that can yield both the required grade of construction aggregate and the necessary dimension stone for heritage conservation uses. The Council conducted two Call for Sites exercises to ensure the opportunity for other landowners and mineral operators to come forward with any suitable alternative site. None have. The only reasonable alternative to continued hard rock land-won supply in Kent (as the NPPF requires landbanks to be specifically maintained for) at this time is to allow increased importation of hard rock and accept the increased carbon emissions that this would entail and reduced certainty associated with this supply option. Recycled aggregate materials would not have the essential primary aggregate characteristics to be a suitable substitute. The irreplaceability of ancient woodland habitat is understood by the County Council and, taking account of the conclusions in the Hermitage Quarry Suitability for Allocation Assessment Report, it is of the view that at this in principle, plan making stage the "wholly exceptional circumstances" and "suitable compensation strategy" NPPF (2024) tests to have been met. This does not mean that the County Council is unaware that there would be impacts on both the ancient woodland, even with soils translocation efforts, or impacts on the setting of the Kent Downs National Landscape. However, the County Council is of the view that landscape impacts can be minimised and mitigated by progressive restoration of any quarried area and a suitable compensation strategy can be demonstrated including by the creation of on and off-site woodland habitats. The Plan's development management criteria have been extensively updated to ensure these matters would be addressed in further detail at the planning application stage.
Groundwater and Contaminated Land - The proposed hard rock site is adjacent to an existing quarry/inert landfill at Hermitage Lane. - Additional groundwater risk assessments would be required to support any future planning application. - The Sustainability Appraisal (SA) and RAG assessment acknowledge groundwater risks, but precautionary measures would still be expected. - Any restoration involving landfilling should be restricted to inert waste only, consistent with current environmental permitting. - The Environment Agency would object in principle to non-inert waste disposal due to: - The site's location on a principal aquifer - The likelihood that non-inert waste would require long-term site	Environment Agency	- Noted. - Noted, this will be addressed at the detailed planning application stage and would be required to be in accordance with the strengthened Mineral Sites Plan Development Management Criteria for water resources. The promoted site's maximum depth of extraction is intended to be above recorded groundwater level and in accordance with advice from Environment Agency. Infilling the quarried void would be subject to the Environment Agency's waste management permitting requirements to prevent pollution by controlling what waste inputs are permitted. - Noted, inert wastes are currently used in the restoration of the existing quarried void. It is the stated intention of the promoter of the nominated site that this would continue in any extended area. - Noted, any detailed planning application stage would have to detail how landfill operations were to be conducted and pollution risk mitigated to satisfy the Environment Agency to be in accordance with the strengthened Mineral Sites Plan Development Management Criteria for water resources. - Noted. It is not the stated intention of the promoter of the nominated site to depart from the use of inert material inputs for restoration purposes.

management. - Landfill proposals are opposed where risk assessments show unacceptable risks, particularly: - Below the water table - Within groundwater Source Protection Zones (SPZ2 or SPZ3) - On or within a principal aquifer - Concerns are raised that quarrying, or restoration could affect northward groundwater flow within the aquifer. - A Hydrogeological Risk Assessment (HRA) would be required where groundwater resources could be impacted. - If unacceptable risks cannot be mitigated, the Environment Agency would object or seek restrictive planning conditions. - Any physical disturbance, lowering of groundwater levels, or interception of groundwater flow would need to provide protection equivalent to that required for licensable abstractions. Fisheries, Biodiversity and Geomorphology - Previous concerns remain that the plan's language is unclear and does not define what constitutes "unacceptable impacts". - Ancient woodland is an irreplaceable habitat and cannot be genuinely compensated for.		- Noted. Any planning application would have to accord with these water resource protection criteria and be compliant with Policy DM 10: Water Environment of the adopted Kent Minerals and Waste Local Plan 2024-39. The Environment Agency would be consulted upon at any detailed planning application stage. - Noted. - Noted. - Unacceptable impacts on environmental assets (habitats, geomorphological features etc) will be more precisely defined through consultation with statutory consultees at the detailed planning application stage. - Part of the site is recognised as ancient woodland, being a Plantation on Ancient Woodland Site (PAWS. A PAWS site is where native trees were cleared and replaced by non-native plantations, in this case a sweet chestnut managed woodland, and is recognised as an irreplaceable habitat including the woodland features as undisturbed soil, ground flora and fungi. It is acknowledged that the development (quarrying for aggregate minerals) would result in the loss of PAWS. Any PAWS losses as a consequence of quarrying have to be justified by "wholly exceptional reasons", together with a suitable compensation strategy. The assessment of whether wholly exceptional reasons exist considers economic, social and environmental matters. This includes the need to plan for a steady and adequate supply of primary land-won aggregates to meet defined markets over the plan period and the socio-economic and environmental benefits that accrue from maintaining a local supply. The Council is satisfied that wholly exceptions reasons exist and a suitable compensation strategy can be demonstrated, and so the DM 2 policy test could be satisfied. A separate report addressing this matter has been prepared. Progressive restoration and increased overall native species of broad leaf woodland and management, along with the translocation of soils is proposed to satisfy the required 'suitable compensation scheme'. Any allocation is dependent upon a suitable compensation strategy, which provides for a net gain of some 112ha of new native planting and enhanced management of existing woodland. The total native woodland creation and enhancement equate to some 154 ha, which would be created compared to the 42ha of non-native woodland (including 41ha of PAWS) which is assumed would be lost to facilitate mineral working. This equates to a 266% increase of native mixed species woodland (by creation and enhancement). The strategy includes the translocation of

- The current RAG conservation assessment is disputed and should be rated Red, given: - The size of Oaken Wood - The scale and significance of potential impacts - Loss of ancient woodland at this scale would be of national significance. - It is unclear how such losses could be reconciled with the legal requirement to achieve Biodiversity Net Gain (from November 2023). Flood Risk - Any planning application for the site would need to be supported by a detailed Flood Risk Assessment. The assessment should identify appropriate measures to minimise and/or mitigate flood risk.		PAWS soils. This strategy is considered acceptable to satisfy the policy test and has been considered by the Plan's accompanying SA. Details of how a planning application could demonstrate a suitable compensation strategy is expanded upon in the Pre-Submission Draft Plan's strengthened development management criteria. - The initial RAG assessment work has been considered further as part of the detailed technical assessment work. This is recognised in the technical assessment. Part of the site is recognised as ancient woodland, being a Plantation on Ancient Woodland Site (PAWS) and a Local Wildlife Site. A PAWS site is where native trees were cleared and replaced by non-native plantations, in this case a chestnut managed woodland and is recognised as an irreplaceable habitat. PAWS losses as a consequence of quarrying have to be justified by a "wholly exceptional reasons" test, and a suitable compensation strategy, where the need for the development (quarrying for aggregate minerals) justifies the identified loss. In assessing the proposal, policy consideration is also required to balance the economic, social and environmental matters. This includes the need to plan for a steady and adequate supply of primary land-won aggregates to meet defined markets over the plan period. The Council is satisfied that wholly exceptional reasons exist and a suitable compensation strategy can be demonstrated, satisfying the policy test. Allocation is dependent upon a suitable compensation strategy, which provides for a net gain of some 112ha of new native planting and enhanced management of existing woodland. The total woodland creation and enhancement equate to 154 ha, which would be created compared to the 42ha woodland (including 41ha of PAWS) which is assumed would be lost to facilitate mineral working. This equates to a 266% increase of native mixed species woodland (by creation and enhancement). The proposals include the translocation of PAWS soils. Taken together it is considered that this demonstrates a suitable compensation strategy could be achieved to satisfy the policy test. - Biodiversity Net Gain (BNG) is a mandatory requirement for planning permission. As the site affects an irreplaceable habitat a compensation strategy is required, to which BNG does not contribute. - The comments regarding flood risk are noted and would be addressed at the detailed planning application stage.
Sharp Sand and Gravel Allocated Site - Stonecastle Farm Quarry		
- Disagrees with the proposed changes to the requirements for sharp sand and gravel. - Unclear about the evidence supporting the new wording in paragraph 2.14 regarding sharp sand and gravel.	Gravesham Borough Council	- KMWLP Policy CSM 2 details the landbank and aggregate requirements for the Plan period to 2024-39. The methodology was the subject of the Plan's examination. The policy allows for the update of requirements based on the most recent LAA data. The LAA 2025 (2024 data) demonstrates that over the KMWLP period there will be a 1.6mt surplus of sharp sands and gravel given current landbanks and the injection of 2.5mt from the Mineral Sites Plan allocations. - The evidence supporting the need for any allocation is derived from the Aggregate Mineral (AM) survey that is undertaken annually and demonstrates available reserves and sales. The data is used to inform if further allocations is required over the Plan period.

- The proposed changes indicate a shortfall in supply over the Plan period, leading to increased reliance on importation. - Suggests incorporating a mechanism for monitoring and early review of the need for additional allocations, similar to the approach for soft sand.		- There will be a surplus over the entire Plan period of sharp sand and gravel given available data from AM 2025 (2024 data) - The process for assessing need for sharp sand and gravel is the same as soft sand and is achieved with the AM data and the LAA process.
- Active lobbying has taken place regarding Stonecastle Farm due to concerns about additional disruption from the quarry extension. - There is a strong need for mitigation measures to reduce impacts on the local community. Mitigation should include the provision of public open space for walkers and horse riders, and potentially cyclists. It is strongly recommended that such mitigation is made a formal condition of any further quarrying permission. - Former quarry areas could be made accessible for recreation while quarrying continues elsewhere. - Mitigation measures should be delivered within a specified and early timeframe. - The local area is poorly served by higher-status PROW. - An off-road bridleway network would help offset safety risks and inconvenience caused by increased HGV traffic on the A228 and surrounding roads.	British Horse Society	The site is an allocated site in the Kent Mineral Sites Plan (MSP), having been found sound at the previous local plan examination. The review of this plan does not seek to de-allocate the site. All public access via defined bridle ways and designated PROW will have to be maintained during any mineral activity. Any directly affected PROW would need to be temporarily re-routed and reinstated as part of an agreed restoration plan. Any re-routing would require the support of the Public Rights of Way officer. These matters would be assessed via a detailed planning application and secured via condition.
Soft Sand Allocation - Chapel Farm		
- Soft Sand Provision: Soft sand is a strategic cross-boundary matter. - East Sussex relies on imports for soft sand, and the SDNPA will respond to the Kent Plans. ESCC endorses the response from the SDNPA.	East Sussex County Council	- Noted, soft sand (Folkestone Formation) is a strategic land-won mineral that is not readily substituted and thus its extraction has significant potential for protected landscape impacts. - Noted.
Disagrees with the proposed changes to the requirements for soft sand.	Gravesham Borough Council	KMWLP Policy CSM2 details the landbank and aggregate requirements as needed for the Plan period to 2024-39. The methodology was the subject of the Plan's examination. The policy allows for the update of requirements based on the most recent LAA data. With the allocation of 3.2mt of further soft sand, and based on the 2024 data, there will be sufficient sand to meet the NPPF 7-year landbank to 2035 (assuming windfall of some 0.84mt from Otterpool new settlement as a prior extraction to safeguard mineral resources). By 2035 there will have been several plan review cycles that would inform the County Council if further allocation were required. At no time to 2039 will supplies be exhausted

The provision of soft sand is a strategic issue for the South East Mineral Planning Authorities (MPAs). The soft sand resource in Kent and the SDNPA is contained within the Folkestone Formation, which extends across several counties. The ability to identify soft sand resources is constrained by the SDNP designation. • The primary purpose is to conserve and enhance the natural beauty, wildlife, and cultural heritage. Promote opportunities for public understanding and enjoyment of the National Park's special qualities. Foster the social and economic wellbeing of local communities within the National Park. • Paragraph 176: Emphasises the importance of conserving and enhancing landscape and scenic beauty in National Parks. • Paragraph 177: States that major development in National Parks should be refused unless there are exceptional circumstances and it is in the public interest. Soft Sand (SS) Position Statement (2019): ○ High Reserves in Kent: Kent has one of the highest reserves and sales of soft sand in the South East. Need for Additional Sites: Additional sites need to be allocated and permitted to ensure a steady and adequate supply. Soft Sand (SS) Statement of Common Ground (SoGC) [July 2022]: ○ Safeguarding Resources: SS resources will be safeguarded in MWLP. Provision Outside Designated Areas: Provision for landbanks of SS should be made outside the SDNP and AONBs as far as practical. ○ Regional Supply: Any surplus in Kent is acknowledged as having potential to meet a wider regional need. ○ Despite the allocation at Chapel Farm West, Lenham, there is still a shortfall of 2.15 million tonnes of SS. ○ LAA: KCC needs to use their LAA to assess demand, including from other areas like East Sussex. • Call for Additional Sites: Encourages exploring opportunities for additional Soft Sand sites outside designated areas to meet regional needs. • Draws attention to the strengthening of National Park	South Downs National Park	• This is agreed, the Folkestone Formation is of a strategic nature to the Southeast England Mineral Planning Authorities (SEEMPAs) and the South Downs National Park (SDNP) is a potential constraint to future supply. • Paragraphs. 176 and 177 relate to the KMWLP 2024-39 now adopted. • The Soft Sand Position Statement 2019 is still of relevance, though the latest LAA 2025 with data to the end of 2024 demonstrates the Kent position on the 7-year maintained soft sand landbank. This is estimated to technically cease in 2035, 4 years short of the end of the KMWLP period of 2039. However, by 2035 the KMWLP will be in its second statutory review cycle since adoption in 2025. Therefore, the potential need to allocate additional sites for maintaining sufficient supply to meet the NPPF maintained 7-year landbank requirement at the end of the plan period (2039) will have been factored into several reviews of the Kent MSP. The Planning Inspectorate accepted this approach and that there was no requirement to allocate further sites at this time. • The LAA monitoring report is predicated by aggregate monitoring (AM) data and the most recent 2024 data, in conjunction with anticipated safeguarding windfall supplies of potentially 1.0mt, demonstrates that a 7-year landbank will continue to 2035 and no exhaustion by 2039. • Accuracy over reserves and landbanks is a matter detailed in the most recent LAA2025 that uses data to the end

purposes through Section 245 of the Levelling Up and Regeneration Act 2023, updates to the National Planning Policy Framework, updates to the South East Soft Sand Position Statement, and adoption of the East Sussex, South Downs, and Brighton & Hove Waste and Minerals Revised Policies Document.		of 2024. This demonstrates that the Kent position on the 7-year maintained soft sand landbank is estimated to technically cease in 2035 - 4 years short of the end of the KMWLP period to 2039. This matter was considered at the examination for the KMWLP which was adopted in 2025 and found that there was no requirement to allocate further soft sand sites at this time. The potential need for further soft sand site allocation to meet identified needs will be addressed in future reviews of the MSP. The Council is currently considering a planning application for the allocated site at Chapel Farm.
• The Further Changes Consultation states that the Minerals Planning Authority (MPA) will have a 10.73-year landbank at the start of the plan period. • Questions the accuracy of landbank data, citing past errors in reserve re-evaluations between the 2021 and 2022 Local Aggregate Assessments. • Permitted reserve figures are considered imprecise as they rely on annual operator reporting. • Commercial confidentiality prevents independent verification of reserve data. • There are concerns operators may under- or mis-report reserves to avoid highlighting planning breaches or reducing site value. • Recent figures show the 3-year sales average (0.468mt) now exceeds the 10-year average (0.456mt). • Soft sand supply has worsened since the previous Local Plan consultation (Oct–Dec 2022). • A 4% increase in year-on-year sales (2021–2022) has been recorded. • The existing landbank has reduced significantly between consultations, increasing the projected shortfall by the end of the plan period. • No public evidence confirms that Chapel Farm will come forward earlier than its anticipated start date (before 2034). • If sales averages remain consistent, the MPA may be unable to demonstrate a 7-year landbank by 2027/28. • This could create a gap between 2027/28 and 2034 with no compliant landbank. • The soft sand supply strategy is therefore heavily reliant on Chapel Farm coming forward on time.	Invicta Planning Ltd	• Accuracy over reserves and landbanks is a matter detailed in the most recent LAA2025 that uses data to the end of 2024. This demonstrates that the Kent position on the 7-year maintained soft sand landbank is estimated to technically cease in 2035 - 4 years short of the end of the KMWLP period to 2039. This matter was considered at the examination for the KMWLP which was adopted in 2025 and found that there was no requirement to allocate further soft sand sites at this time. The potential need for further soft sand site allocation to meet identified needs will be addressed in future reviews of the MSP. The Council is currently considering a planning application for the allocated site at Chapel Farm.

If Chapel Farm is brought forward earlier, it would indicate higher demand and potential exhaustion of other reserves. This raises further concerns that existing reserve figures or reported sales averages may significantly underestimate actual demand.		
Sharp Sand and Gravel Allocated Site - Moat Farm		
Sharp sand and gravel, Para 2.4- 10-year average of sharp sand and gravel sales on the Draft Review Plan appears low. The 10-year average reported in LAA 2022 is 186,150t but the sales figures represented in Table 2 of the LAA says 228,544tpa. A minimum 7-year landbank to be maintained would be 1.6mt which would be inadequate by 2027 if the potential yield in the allocated sites is not realised or by 2038 if it is. Therefore, if not maintained, the minimum landbank would not be maintained at the end of the Plan period. The level of provision, based on the LAA (2022) rate would be 5.016mt, giving a larger shortfall of 2.962mt. Taking into account the potential yield rather than the reverse, the surplus reported in the Plan then becomes a shortfall of 0.462mt.	Mineral Products Association	Para 2.4 of Policy CSM2 of the now adopted KMWLP 2024-39 details the permitted landbanks and the necessary requirements, as potential new reserves, from allocation of sites in a Mineral Sites Plan. The policy allows for the update of requirements based on the most recent LAA data. The LAA2025 (2024 data) demonstrates that over the KMWLP period there will be a 1.6mt surplus of sharp sands and gravel given current landbanks and the injection of 2.5mt from the MSP allocations. There will be no shortfall over the projected Plan period to 2039.
- Active lobbying has taken place regarding Moat Farm due to concerns about additional disruption from the quarry extension. - There is a strong need for mitigation measures to reduce impacts on the local community. - Mitigation should include the provision of public open space for walkers and horse riders, and potentially cyclists. - Former quarry areas could be made accessible for recreation while quarrying continues elsewhere. - It is strongly recommended that such mitigation is made a formal condition of any further quarrying permission. - Mitigation measures should be delivered within a specified and early timeframe. - The local area is poorly served by higher-status PROW. - An off-road bridleway network would help offset	British Horse Society	The site is an allocated site in the Kent Mineral Sites Plan (MSP) 2020, having been found sound at the previous local plan examination. The review of this Plan does not seek to de-allocate the site. All public access via defined bridle ways and designated PROW will have to be maintained during any mineral activity at this allocated site. Further details will be assessed at detailed planning application stage.

safety risks and inconvenience caused by increased HGV traffic on the A228 and surrounding roads.		

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Sustainability Appraisal Report

Updates to Mineral Sites Plan

Regulation 19 Consultation

Prepared for



Kent County Council

**June 2026
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1.0 EXECUTIVE SUMMARY

- 1.1.1 Axis has been commissioned to undertake a Sustainability Appraisal (SA) in support of the preparation of an update to the Kent Mineral Sites Plan (MSP). This report presents the interim outcomes of this process up to the Regulation 19 stage. The draft update to the MSP considers a new site proposed for allocation in the MSP for hard rock, alongside the three already allocated sites for soft sand and sharp sand and gravel which it is proposed be retained in the updated MSP. The new site is Land South and West of Hermitage Quarry, adjacent to the existing quarry.
- 1.1.2 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 challenges. 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 2.1** of the report. The new site proposed for allocation on Land South and West of Hermitage Quarry and the existing sites allocated in the MSP as a whole have been appraised against this set of sustainability objectives. For the new site proposed for allocation, the findings are set out below, while the findings for the MSP as a whole are set out in the main report which follows this summary.
- 1.1.3 Allocation of Land South and West of Hermitage Quarry would ensure the continued local supply of hard rock as a material to support economic growth, in particular via its use as a construction aggregate. It would provide support for local jobs within the mineral industry and help to avoid increased transport costs for hard rock. It would ensure the continued availability of Kentish ragstone for use in building restoration projects, which has qualities difficult to find in stone from elsewhere.
- 1.1.4 There are some residential dwellings in proximity to the site proposed for allocation and there is the potential for impacts on these nearby residential areas from dust, noise, blasting, visual intrusion and light. Proposed development criteria require appropriate mitigation of impacts in accordance with KMWLP Policy DM 11 Health and Amenity.
- 1.1.5 The southern part of the site is designated as ancient woodland in the form of a Plantation on Ancient Woodland Sites (a sweet chestnut coppice) which would be lost to development, potentially fragmenting the remaining woodland. Ancient

woodland is deemed irreplaceable habitat¹ legally requiring a compensation plan. The ancient woodland soil has biodiversity value and is proposed for translocation as part of the compensation plan. Part of Oaken Wood Local Wildlife Site (LWS) would be lost to development, also potentially fragmenting remaining parts of the woodland. Plans are to restore the site to deciduous native woodland to achieve a net gain in biodiversity. Conditions should be imposed on development so that worked areas are restored soon after completion and without avoidable delay. The agricultural land in the northern part of the site is grade 2 (very good). The soil from this area would be required to be stripped, stockpiled and used for restoration. Any planning application is required to be accompanied by a Soil Resource Plan as per government guidance.

- 1.1.6 Public Right of Way (PROW) path MR108 crosses the site and there are several permissive tracks through Oaken Wood which may be used for recreation by walkers and riders. The PROW would be subject to diversions which, in accordance with KMWLP policy, must preserve the connectivity of routes and made safe for all users. The permissive tracks would also be diverted for the benefit of users.
- 1.1.7 An area Tree Preservation Order covers land to the north of the proposed site, the majority of which has already been lost to extraction. A strip of land along the southern and western borders of the TPO with remaining trees is covered by the proposed working area, therefore trees covered by the TPO would be lost. This would be an adverse impact on amenity in the short to medium term, but restoration to native woodland would reverse this loss in the long term
- 1.1.8 The site is 3.9km from the Kent Downs National Landscape and there will be no significant visual impacts provided the site is worked sequentially with the existing operations. The Maidstone Landscape Character Assessment identifies Oaken Wood as a particular landscape and, although workings from extraction could be screened, this will not be a minor change and will not preserve the continuity of the feature, therefore adverse impacts are likely. It would be difficult to avoid significant impacts on KCC Character Area Mereworth Woodlands, but a well-considered

¹ Defined by *The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024*

restoration scheme could theoretically result in new native woodland over a period of years post-extraction, restoring the character of the area to some degree.

- 1.1.9 The 2022 planning permission amending vehicle numbers for the existing quarry states that there should be a daily maximum combined total of 800 HGV movements a day within a single calendar month, and no higher than 900 on any one day. Proposed development management criteria require HGV levels not to exceed those at the existing site unless it is demonstrated that this will not give rise to unacceptable adverse impacts, therefore impacts on the nearby AQMAs, the local road network and on greenhouse gas emissions are unlikely to increase.
- 1.1.10 There are listed buildings in proximity to the site. While it is possible that extraction at the site could have adverse impacts on one or more of these listed buildings, the separation distances would suggest that any impacts would be minor and proposed development management criteria require mitigation of unacceptable adverse impacts, in accordance with KMWLP policy. There is some potential for palaeolithic interest on the site and any planning application is required to be accompanied by an assessment of the archaeological value of the site and a proposed plan for preserving remains in situ where possible or removing and conserving remains offsite.
- 1.1.11 The site is underlain by principal and secondary bedrock and superficial aquifers. It is classed as having medium and medium-high groundwater vulnerability in the north of the site and high groundwater vulnerability in the south and east of the site and lies within a Source Protection Zone 3. There is the potential for impacts on water, although proposed development management criteria require demonstration that development would not give rise to unacceptable adverse impacts on the water environment, therefore adverse impacts are unlikely.
- 1.1.12 The SA has made a number of recommendations for measures to prevent, reduce and as fully as possible offset any significant adverse effects of an updated MSP that included the new site proposed for allocation on Land South and West of Hermitage Quarry.
- 1.1.13 The SA is required to appraise reasonable alternatives to an updated MSP that included the new site proposed for allocation. No other site for the extraction of hard rock was nominated during the initial Call for Sites undertaken in 2022 and the subsequent second Call for Sites which took place between August and October

2023. Although an assessment has been made of potential sites within Kent, no suitable sites were identified.

- 1.1.14 An alternative to allocating the site on Land South and West of Hermitage Quarry could be to rely instead on imports of hard rock from outside of the county. Importation of hard rock to meet local needs will increase the need for the transport of mineral and associated emissions to air. There is a greater likelihood of negative impacts on air quality and climate change, and negative impacts may be caused on congestion, noise and disturbance, depending on route and distance. The total distance transported is likely to lead to higher emissions overall. Importation of hard rock is also likely to have adverse economic impacts from increased transport costs and loss of jobs within Kent. Kentish ragstone would not be available for use in heritage restoration projects, therefore adverse impacts on the built historic environment are likely.

2.0 NON-TECHNICAL SUMMARY

2.1 Background

2.1.1 Axis has been commissioned to undertake a Sustainability Appraisal (SA) in support of the updates being made to the adopted Kent Mineral Sites Plan (MSP). This report presents the outcomes of this process up to Regulation 19 stage. SA is a mechanism for considering and communicating the likely effects of a draft plan, and reasonable alternatives, with a view to avoiding and mitigating adverse effects and maximising positives.

2.2 What is the Plan seeking to achieve?

2.2.1 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. Three sites are currently allocated within the adopted MSP for soft sand and sharp sand and gravel.

2.2.2 The main objective of the MSP is to ensure that Kent has enough permitted aggregate mineral reserves over the plan period (until 2039) and beyond to meet plan making requirements, which are maintaining a landbank of 7 years for sand and gravel and maintaining a landbank of 10 years for hard (crushed) rock.

2.2.3 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 which have since been removed from the KMWLP. The KMWLP identified that the specific sites for minerals developments would be set out in the separate MSP.

2.2.4 In 2021, KCC completed a five year review of the KMWLP. This identified the need for updates to the KMWLP including a change to the timeframe covered by the KMWLP, from 2024 to 2039 (previously 2013-30). It became clear that, with this extended timeframe, there are not sufficient permitted reserves in the adopted Mineral Sites Plan to maintain a 10 year landbank for hard rock, as required by national policy, and there is therefore a need to identify new suitable reserves of hard rock in the form of one or more additional site allocations in the Mineral Sites Plan. A Call for Sites was therefore undertaken in October 2022, which resulted in the following additional site being nominated by the site promoter for inclusion in the

MSP - Land to the South and West of Hermitage Quarry. A second Call for Sites took place between August and October 2023, but this did not result in the nomination of any further sites.

2.3 What's the situation now (sustainability baseline)?

2.3.1 The following is a summary of the sustainability baseline characteristics in Kent.

2.3.2 Environmental baseline:

- i) After a gradual rise in the amount of residual waste collected per person in Kent, it has fallen recent years, from 426.4 kg in 2021/22 to 406.5 kg in 2023/24. Less than half (39%) of household waste was reused, recycled or composted in 2022/23 and less than 1% is landfilled. Most of the remainder is incinerated with energy recovery.
- ii) Some 6.58 million tonnes of waste of all kinds (the majority being construction and demolition waste) were reported as being managed at Kent waste management facilities in 2022. This compares with around 1.49 million tonnes of Kent waste managed outside the county. However, this export is more than offset by imports, so taking a simple balance, Kent remains net self-sufficient.
- iii) Construction aggregates (sand, gravel and ragstone) are the main types of economically important minerals extracted in Kent at this time, although brickearth, clay and chalk (for engineering and agricultural lime applications) are also extracted. This is supplemented with imports and recycled aggregates. There is a predicted shortfall of available reserves of hard rock at the maintained 'at least' 10-year level for, and at the end of, the Plan period (2024- 2039).
- iv) 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 9.8% of the county. The county contains c.11% of England's ancient woodland, the largest amount in England.
- v) The Thames Gateway is also acknowledged for its national importance due to 'brownfield' biodiversity.
- vi) 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 built-development or intensive farming, which has reduced and fragmented populations; and the effects of climate change.

- vii) Kent is considered to be the most at risk 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.
- viii) Since 2006 there has been a steady reduction in carbon dioxide emissions, to 3.9 tonnes per capita in 2023. This is slightly lower than UK emission levels of 4.1 tonnes per capita.
- ix) The annual report of the Kent and Medway Air Quality Partnership reports that NO₂ concentrations remain below pre COVID-19 pandemic levels, PM₁₀ and PM_{2.5} concentrations are above the UK average but showing a general decreasing trend, and SO₂ levels closely follow the overall decreasing UK trend.
- x) Kent has the highest number of listed buildings in the South East, and is third highest of all counties in England behind only Devon and Greater London.
- xi) The Kent Downs National Landscape covers nearly a quarter of the County, whilst the High Weald National Landscape is shared with East Sussex.
- xii) Green Belt comprises the majority of Sevenoaks, Tonbridge and Malling and Gravesham Districts, as well as a proportion of Tunbridge Wells and Dartford Boroughs and a small part of Maidstone Borough.
- xiii) There are relatively extensive areas of excellent (grade one) agricultural land in Kent. This land tends to be concentrated in the north of the county, running in a band from Gillingham in the west through to Deal in the east. Pockets can also be found in the area surrounding New Romney, to the west of Maidstone and north east of Ashford. Good or very good quality agricultural land can be found in many parts of Kent.
- xiv) Road traffic has grown fairly steadily over the years, apart from 2020 when COVID-19 particularly affected car traffic. The effect on LGVs and HGVs was less marked, although still showed a decrease. Kent is a major gateway for the movement of international freight through the Channel Tunnel, the ports of Dover, Ramsgate and Sheerness. Road haulage is the dominant means of transport in this sector.
- xv) Pressures on water availability 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. Water stress poses long term risk to housing development, economic growth, tourism and everyday water access for residents. It also threatens the county's rich natural

habitats and biodiversity. The majority of catchments within Kent in 2022 were of moderate ecological status, largely similar to the status in 2019.

2.3.3 Social baseline:

- i) Kent will have an estimated population of 1,653,893 in mid-2026. By 2039, the population of Kent is projected to increase to 1,778,618, an increase of c. 7.5%.
- ii) Significant areas within Kent are amongst England's most deprived 30% of local authorities, measured by the Indices of Multiple Deprivation.
- iii) Life expectancy is 9 years lower for men and 7 years lower for women in the most deprived populations in Kent compared to the least deprived populations.
- iv) Mortality rates from cancer and cardiovascular disease have fallen and are better than the England average. Nearly a quarter (23%) of children aged 4-5 are classified as being obese, higher than the average for England (22%). However, estimated levels of adult obesity in Kent (25.6%) are lower than the England average (26.5%) but increasing (an increase of 2.5% since 2016).
- v) Climate change projections highlight an increase in risk to people from flooding and hotter, drier summers leading to public health risks.

2.3.4 Economic baseline:

- i) In 2022, the gross disposable household income in Kent was £24,341 per head, 4.3% above the national average.
- ii) Between 2021 and 2025, the number of active enterprises shrank by 1%, to 68,910, which slightly better than the national average which shrank by 4%.
- iii) The overall employment rate in Kent has risen since the KMWLP was adopted, from 73.8% in 2016 to 75.7% in 2025.
- iv) Apart from slight declines in 2008-2009 and 2022, GVA per head in Kent and Medway has risen steadily in the 21st century. In 2025 it was £29,379 per head, up from £14,029 in 2000, a rise of 109%. However, per capita GVA is lower than for the South East as a whole and for England.
- v) The largest sector for employment in 2024 was wholesale and retail trade at 16.2%, followed by human health and social work at 13.9% and education at 9.4%. The distribution sector generated the highest gross value added in Kent in 2023, a fifth of the total.

2.4 How would the baseline change without an MSP updated to include the new site proposed for allocation?

- 2.4.1 There is a degree of uncertainty about how the baseline might change without the adoption of an MSP updated to include the new site proposed for allocation on Land South and West of Hermitage Quarry. Proposals for development of new mineral sites could still come forward and these will be required to comply with the policies of the KMWLP. This includes development management 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.
- 2.4.2 However, without an MSP updated to include the new site proposed for allocation there will be less certainty that Kent would be able to provide enough hard rock to support the expected future demand for minerals from construction and industry, particularly for the restoration of historic buildings. 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 may have adverse effects on transport networks and air quality and may be difficult to blend in with existing Kentish ragstone used in buildings within the county and beyond. It is unlikely that secondary and recycled aggregates or marine dredged aggregates would meet the specification required.
- 2.4.3 Without an MSP updated to include the new site proposed for allocation, imports from other parts of the country may be required. This could lead to increased carbon dioxide emissions from mineral transport and associated risks to people and communities.
- 2.4.4 The social baseline is unlikely to be significantly affected without the adoption of an MSP updated to include the new site proposed for allocation. Population, levels of deprivation and health are unlikely to be significantly different with or without an MSP updated to include the new site proposed for allocation, although jobs will be lost at the existing operational quarry when the permitted resource is exhausted.

2.5 Characteristics of Areas Likely to be Significantly Affected

- 2.5.1 Areas likely to be affected are in the vicinity of each of the sites either already allocated or proposed for allocation. The characteristics of the four sites are described in the following paragraphs.

- 2.5.2 The proposed extension to Hermitage Quarry is on land designated as either grade 2 agricultural land (very good) or ancient replanted woodland. Some of the land is also designated as a Local Wildlife Site, some contains biodiversity priority habitats and some has local landscape significance. It is underlain by aquifers and has groundwater vulnerability, but low flood risk. There are a number of residential dwellings in proximity to the site and several listed buildings, and there may be below-ground palaeolithic interest. There is a Public Right of Way that crosses the site, and it is adjacent to a SSSI of geomorphological importance. Two AQMAs are fairly close to the site, one adjacent to the existing quarry and one on main roads passing through the Borough including the M20.
- 2.5.3 Site M3 (Chapel Farm) is a previously unworked site rather than an extension to an existing site, situated in countryside to the south east of Lenham between junctions 8 and 9 of the M20. The site is an area of open landscape rising from Lenham Heath Road towards the A20 and is within the setting of the Kent Downs National Landscape. The site is grade 2 agricultural land and is adjacent to ancient woodland, priority habitats with notable species, and three Local Wildlife Sites. Footpaths cross the site. There are a small number of residential dwellings and listed buildings in proximity to the site. The site overlies an aquifer and is partly in a Source Protection Zone 3 for a public water abstraction borehole. It also overlies a length of the River Stour. Sewerage infrastructure crosses the site, and a wastewater treatment works is adjacent. Any planning application must be accompanied by adequate proposals to show the sewerage infrastructure will not be adversely affected.
- 2.5.4 Site M10 (Moat Farm) is an extension to existing operations situated in countryside to the north of Five Oak Green near Tonbridge and the River Medway. It is predominantly arable fields (predominantly grade 3b) surrounded by hedgerows and ditches, potentially with notable species and with an area of ancient woodland to the north of the site. Footpaths cross the site and there is a residential property near the site. It is located in Green Belt and an area of flood risk. The site overlies an aquifer and lies partially within a groundwater source protection zone. The Alder Stream and smaller ditches run through the site.
- 2.5.5 Site M13 (Stonecastle Farm Quarry Extension) is in countryside to the north west of Five Oak Green near Tonbridge, adjacent to the River Medway. It is a large arable field (predominantly grade 3b) with hedgerows within and surrounding the site, adjacent to a Local Wildlife Site and ancient woodland. There are areas of

biodiversity priority habitat within and adjacent to the site which have the potential to contain notable species. A public right of way runs near to the site. The site is within the Green Belt and an area of flood risk and extends into groundwater source protection zones. There is a listed building near to the site access, and a low potential for archaeological or other historic remains onsite.

2.6 Areas of Particular Environmental Importance

2.6.1 Kent contains a number of designated sites of international nature conservation importance. In addition, there are further designated sites outside Kent but within 10km of the county boundary. These sites are listed in the SA Scoping Report. There are two designated sites that are within 10km of the proposed additional mineral site:

- i) North Downs Woodland SAC at 6.2km
- ii) Peters Pit SAC at 6.5km

2.6.2 The importance of each of these sites is described in **Section 4.7**.

2.7 SA Framework and Sustainability Objectives

2.7.1 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 (see **Sections 4.2** and **4.3**). 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 2.1**. The framework was published for consultation in the SA Scoping Report and **Table 2.1** below also incorporates three additional detailed criteria (in italics) following a refresh of baseline data and policy documents following the draft updated MSP Regulation 18 consultation.

Table 2.1 – SA Framework

Sustainability Objectives	Detailed Considerations
1. Biodiversity	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 i) Add to the biodiversity baseline by creating opportunities for targeted habitat creation (which, ideally, contributes to local or landscape scale habitat networks). ii) Avoid hindering plans for biodiversity conservation or enhancement iii) Support increased access to biodiversity

	iv) Provide a net gain in biodiversity value v) <i>Compensate for the loss of irreplaceable habitat</i>
2. Climate change	Address the causes of climate change through reducing emissions of greenhouse gases through energy efficiency and energy generated from renewable sources i) Promote sustainable design and construction of facilities and support wider efforts to reduce the carbon footprint of minerals and waste operations. ii) Promote climate change adaptation
3. Community and well-being	Support efforts to create and sustain sustainable communities, 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 Multiple deprivation. ii) Help to tackle more hidden forms of deprivation and exclusion, such as that which is experienced in urban and coastal areas and particular socio-economic groups within communities. iii) Ensure that the necessary aggregates are available for building, and that the necessary waste infrastructure is in place to support housing and economic growth iv) Ensure that minerals and waste development does not contribute to poor air quality with particular reference to PM2.5 and NOx v) Protect and enhance public rights of way and access vi) Protect local green space vii) Avoid loss of tranquillity
4. Sustainable economic growth	Support economic growth and diversification i) Support the development of a dynamic, diverse and knowledge-based economy that excels in innovation with higher value, lower impact activities ii) Stimulate economic revival and targeted employment generation in deprived areas
5. Flood risk	Reduce the risk of flooding and the resulting detriment to public wellbeing, the economy and the environment i) Ensure that development does not lead to increased flood risk on or off site ii) Seek to mitigate or reduce flood risk through developments that are able to slow water flow and promote groundwater recharge
6. Land	Make efficient use of land and avoid sensitive locations i) Make best use of previously developed land ii) Avoid locations with sensitive geomorphology iii) Seek to safeguard the best and most versatile agricultural land and recognise its economic and other benefits iv) Prevent inappropriate development in the Green Belt v) <i>Restore land quality</i>
7. Landscape and the historic environment	Protect and enhance Kent's countryside and historic environment i) Protect <i>and enhance</i> the integrity of National Landscapes and their setting and other particularly valued or sensitive landscapes ii) Take account of the constraints, opportunities and priorities demonstrated through landscape characterisation assessments and other studies at the landscape scale. iii) Avoid light pollution iv) Protect important heritage assets and their settings, as well as take account of the value of the character of the wider historic environment
8. Transport	Reduce and minimise unsustainable transport patterns and facilitate the transport of minerals and waste by the most sustainable modes possible i) Minimise minerals and waste transport movements and journey lengths; and encourage transport by rail and water.

	ii) Ensure that minerals and waste transport does not impact on sensitive locations, including locations already experiencing congestion and locations where planned growth or regeneration is reliant on good transport networks.
9. Water	Maintain and improve the water quality of the Kent's rivers, ground waters and coasts, and achieve sustainable water resources management i) Ensure that minerals and waste development seeks to promote the conservation of water resources wherever possible with particular reference to abstraction. ii) Avoid pollution of ground or surface waters, particularly in areas identified as being at risk or sensitive iii) <i>Promote sustainable drainage management</i>
10. Waste	Ensure the sustainable management of waste i) Manage waste in accordance with the waste hierarchy ii) Prevent adverse effects from waste on human health and the environment iii) Ensure waste is managed as near as possible to its place of production

2.8 Likely Significant Effects of an Updated MSP

2.8.1 The SA has appraised the new site proposed for allocation on Land South and West of Hermitage Quarry for the likely impacts on sustainable development policy objectives. It has also reviewed and updated the appraisal of existing allocated sites in the adopted MSP. The methodology and assumptions used in undertaking the appraisal are set out in **Section 6**. The detailed findings of the SA of all the sites are set out in **Appendix C**. These are summarised below for the new site proposed for allocation at Hermitage Quarry and for the MSP as a whole updated to include the new proposed site.

Land South and West of Hermitage Quarry

2.8.2 Allocation of Land South and West of Hermitage Quarry would ensure the continued local supply of hard rock as a material to support economic growth, in particular via its use as a construction aggregate. It would provide support for local jobs within the mineral industry and help to avoid increased transport costs for hard rock. It would ensure the availability of Kentish ragstone for use in building restoration projects, which has qualities difficult to find in stone from elsewhere.

2.8.3 There are residential dwellings in proximity to the site proposed for allocation to the south and west of Hermitage Quarry and there is the potential for impacts on these dwellings from dust, noise, blasting, visual intrusion, light and loss of open space. Proposed development criteria require appropriate mitigation of impacts in accordance with KMWLP Policy DM 11 Health and Amenity.

- 2.8.4 The southern part of the site is designated as Plantation on Ancient Woodland Sites, which would be lost to development, potentially fragmenting the remaining woodland. Ancient woodland is deemed irreplaceable habitat² legally requiring a compensation plan and proposed development management criteria include compensation measures. The ancient woodland soil has biodiversity value. Part of Oaken Wood Local Wildlife Site (LWS) would be lost to development, also potentially fragmenting remaining parts of the woodland. Plans are to restore the site to deciduous native woodland and meadow to achieve a net gain in biodiversity. Worked areas should be required to be restored soon after completion and without avoidable delay. The agricultural land in the northern part of the site is grade 2 (very good). The soil from this area would be required to be stripped, stockpiled and used for restoration. Any planning application is required to be accompanied by a Soil Resource Plan as per government guidance³.
- 2.8.5 Public Right of Way path MR108 crosses the site and there are several permissive tracks through Oaken Wood which may be used for recreation by walkers and riders. The Public Right of Way would be subject to diversions which, in accordance with KMWLP policy, must preserve the connectivity of routes and made safe for all users. In addition, the draft Landscape Strategy⁴ proposes the creation of additional paths and therefore there are likely to be long-term benefits.
- 2.8.6 An area Tree Preservation Order covers land to the north of the proposed site, the majority of which has already been lost to extraction. A strip of land along the southern and western borders of the TPO with remaining trees is covered by the proposed working area, therefore trees covered by the TPO would be lost. This would be an adverse impact in the short to medium term, but restoration to native woodland would reverse this loss in the long term.
- 2.8.7 The site is 3.9km from the Kent Downs National Landscape and it is likely that there will be no significant visual impacts provided the site is worked sequentially with the existing operations. The Maidstone Landscape Character Assessment identifies Oaken Wood as a particular landscape and, although workings from extraction could be screened, this will not be a minor change and will not preserve the continuity of

² Defined by The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024

³ Construction Code of Practice for the Sustainable Use of Soils on Construction Sites, Defra, September 2009

⁴ Land South and West of Hermitage Quarry: Proposed Landscape Strategy 2024 Draft, Hill-Wood and Co (Kent) Ltd, 2024

the feature, therefore adverse impacts are likely. Significant impacts are likely on the KCC Character Area Mereworth Woodlands, but could be restored to some degree through restoration.

- 2.8.8 The 2022 planning permission amending vehicle movement numbers for the existing operations states that there should be a daily maximum combined total of 800 HGV movements a day within a single calendar month, and no higher than 900 on any one day. Proposed development management criteria require HGV levels not to exceed those at the existing site unless it is demonstrated that this will not give rise to unacceptable adverse impacts, therefore impacts on the nearby AQMAs, the local road network and on greenhouse gas emissions are unlikely to increase.
- 2.8.9 There are listed buildings in proximity to the site. While it is possible that extraction at the site could have adverse impacts on one or more of these listed buildings, the separation distances would suggest that any impacts would be minor and proposed development management criteria require mitigation of adverse impacts, in accordance with KMWLP policy. There is some potential for palaeolithic interest on the site and any planning application is required to be accompanied by an assessment of the archaeological value of the site and a proposed plan for preserving remains in situ where possible or removing and conserving remains offsite.
- 2.8.10 The site is underlain by principal and secondary bedrock and superficial aquifers. It is classed as having medium and medium-high groundwater vulnerability in the north of the site and high groundwater vulnerability in the south and east of the site and lies within a Source Protection Zone 3. There is the potential for impacts on water, although proposed development management criteria should ensure that unacceptable adverse impacts are avoided.
- 2.8.11 The SA has made a number of recommendations for measures to prevent, reduce and, as fully as possible, offset any significant adverse effects of an MSP updated to include the new site proposed for allocation.

Impacts of an MSP Updated to Include the New Site Proposed for allocation on Land South and West of Hermitage Quarry

- 2.8.12 Each of the sites contain, or are adjacent to, some form of biodiversity asset or biodiversity value and impacts are possible in each case. Planning applications are

required to fully assess the impacts on biodiversity, to provide mitigation to ensure no unacceptable adverse impacts and to provide a net gain in biodiversity. Restoration proposals at three of the sites aim to restore the site to biodiversity habitat which will help to mitigate any potential loss.

- 2.8.13 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.
- 2.8.14 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 of footpaths and loss of tranquillity. However, development management criteria require mitigation to adequately minimise impacts from dust, noise, vibration, light and visual impacts and cumulative impacts are not likely to be significant.
- 2.8.15 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 and by supporting the retention of jobs in the mineral industry within Kent. By facilitating the extraction of primary aggregates, the Minerals Sites Plan is exploiting a non-renewable resource.
- 2.8.16 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.
- 2.8.17 Two of the mineral sites contain soil which is classed as the best and most versatile agricultural land, although restoration to agricultural land is proposed for one of these and therefore the impact on soil quality in the longer term is not likely to be significant for this site, subject to the implementation of a soil resources plan. 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, if they do, that very special circumstances exist to justify the approval of planning permission. Given that the sites will be restored to wetland habitat, lasting cumulative impacts on the Green Belt are not envisaged.

- 2.8.18 There is the potential for the sites to have some impacts on landscape and on the historic environment. However, it will be possible to provide mitigation such that the significance of impacts is minimised in most instances. However, the new site proposed for allocation at Hermitage Quarry will have impacts on local landscape character that are unlikely to be mitigated. Adverse impacts on the National Landscapes are not likely to be significant.
- 2.8.19 Minerals sites generate vehicle movements accessing and leaving the sites. The majority of these are HGV movements and additionally staff vehicles will access the sites. For sites M10 and M13 and the new site proposed for allocation, 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 an MSP updated to include the new site proposed for allocation overall is not expected to be great given the predicted number of movements and the context of all traffic movements in the county. Because of the location of the existing sites allocated, and the new site proposed for allocation, it is unlikely that a Minerals Sites Plan that included these sites would 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.
- 2.8.20 Each of the currently allocated mineral sites have the potential for significant impacts on hydrology/hydrogeology and water quality. The site proposed for allocation at Hermitage Quarry is unlikely to affect hydrology/hydrogeology or quality. Development management criteria for the allocated sites require assessment and mitigation of hydrological impacts and the cumulative impacts from all sites proposed for allocation in the Mineral Sites Plan are not expected to be significant for the county as a whole.

2.9 Recommendations for Mitigation of Impacts

- 2.9.1 The SA has considered whether there is scope for making recommendations for measures to prevent, reduce and as fully as possible offset any significant adverse effects of the updated MSP. A series of recommendations are made which are summarised in **Section 7.2** and set out in detail in **Appendix C**.

2.10 Reasons for Selecting Alternatives Dealt With

- 2.10.1 The SA is required to appraise reasonable alternatives to an MSP updated to include the new site proposed for allocation on Land South and West of Hermitage Quarry. No other site for the extraction of hard rock was nominated during two Calls for Sites undertaken in 2022 and 2023. Although an assessment has been made of potential alternative sites within Kent, no suitable site has been identified.
- 2.10.2 An alternative to allocating the new site at Hermitage Quarry could be to rely instead on imports of hard rock from outside of the county. This has therefore been appraised by the SA as a reasonable alternative.
- 2.10.3 Importation of hard rock to meet local needs will increase the need for the transport of mineral and associated emissions to air. There is a greater likelihood of negative impacts on air quality and greenhouse gas emissions, and negative impacts may be caused by congestion, noise and disturbance, depending on route and distance. The total distance transported is likely to lead to higher emissions overall. Importation of hard rock is also likely to have adverse economic impacts from increased transport costs and loss of jobs within Kent, although jobs would be supported at quarries outside Kent. Kentish ragstone would not be available for use in heritage restoration projects, therefore adverse impacts on the built historic environment are likely if suitable alternatives cannot be found.
- 2.10.4 Importation from elsewhere may have adverse impacts on communities and the environment in proximity to the sites where extraction takes place, but this is dependent on where the mineral comes from and the conditions at those sites. The control of impacts at those sites is a matter for the relevant Mineral Planning Authorities.

2.11 Methodology

- 2.11.1 The SA is required to undertake an appraisal of an MSP updated to include the new site proposed for allocation on Land South and West of Hermitage Quarry. The new proposed site and associated reasonable alternative have been subject to assessment using the SA framework set out in **Section 2.7** (see **Table 2.1**), making a largely qualitative assessment with reference to available baseline data. Assessment matrices have been drafted and are presented in **Appendix C** and the results are summarised in **Section 7.1**.

2.11.2 The SA must also appraise the existing allocated sites as these would also be included in an MSP updated to include the new site proposed for allocation. These sites were appraised in the SA of the currently adopted MSP during its development, the results of which were set out in the SA Report accompanying that Plan, published in November 2020. This appraisal work has been reviewed and updated where appropriate, including to incorporate the more recent additions to the appraisal framework highlighted in **Table 2.1**.

2.11.3 In reporting the results of the appraisal, the following symbols have been used to indicate the broad nature of the predicted effect:

Table 2.2 – Effects Symbols

Type of Effect	Symbol
Significant positive effect	++
Some positive effect	+
No effect	0
Some adverse effect	-
Significant adverse effect	- -
Uncertain effect	?

2.11.4 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 5** of the main report. These relate to the lack of available data in some instances, lack of operational detail and uncertainties about the scale and nature of some impacts.

2.12 Monitoring Recommendations

2.12.1 The sustainability appraisal has developed a set of recommendations for monitoring the predicted and unforeseen impacts of implementation of an MSP updated to include the new site proposed for allocation on Land South and West of Hermitage Quarry. These are set out as a series of indicators related to the sustainability appraisal framework based on the likely and possible impacts of such an updated MSP. The recommended indicators should be incorporated into the Annual Monitoring Report for the KMWLP and are set out in **Section 8**.

3.0 INTRODUCTION

3.1 Background

3.1.1 Axis has been commissioned to undertake a Sustainability Appraisal (SA) in support of the updates being made to the adopted Kent Mineral Sites Plan (MSP). These updates are required as a result of a five year review of the Kent Minerals and Waste Local Plan 2013-30 (KMWLP). This five year review, a legal requirement for all local plans under the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2017, identified the need for updates to the KMWLP including a change to the timeframe covered by the KMWLP, from 2024 to 2039 (currently 2013-30). It has become clear that, with this extended timeframe, there are not sufficient permitted reserves in the adopted Mineral Sites Plan⁵ to maintain a 10 year landbank⁶ for hard rock, as required by national policy, and there is therefore a need to identify new suitable reserves of hard rock in the form of one or more additional site allocations in the Mineral Sites Plan. Hard rock can be used as an aggregate (often high quality) when it is crushed (crushed rock) and used as such e.g. in concrete.

3.1.2 SA is a mechanism for considering and communicating the likely effects of a draft plan, and reasonable alternatives, with a view to avoiding and mitigating adverse effects and maximising positives. This report presents the outcomes of this process up to Regulation 19 stage.

3.2 The SA Process

3.2.1 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 transpose into national law the requirements of the retained EU Strategic Environmental Assessment (SEA) Directive. The 2004 Regulations require that a report – which for the purposes of SA is known as the ‘SA Report’ – is prepared which appraises the effects of a plan on sustainable development objectives and is taken into account in any update of the MSP prior to its adoption. Essentially, the

⁵ Mineral Sites Plan, Kent County Council, September 2020

⁶ A landbank is a stock of mineral reserves with planning permission for their winning and working.

SA Report must ‘identify, describe and evaluate’ the likely significant effects of implementing ‘the plan, and reasonable alternatives’.

- 3.2.2 In line with regulatory requirements, SA has already been undertaken throughout the drafting and adoption of the KMWLP and MSP. Kent County Council are considering updating their Minerals Sites Plan to reflect the need to maintain a landbank of 10 years for crushed rock. The MSP must be in conformity with the overarching KMWLP policies and identify sites which meet with the KMWLP’s requirements and aspirations. The new mineral site proposed for allocation on Land South and West of Hermitage Quarry was the only site submitted following the Call for Sites undertaken in October 2022 (a second Call for Sites took place between August and October 2023 but this did not result in the nomination of any further sites). In addition to KCC’s own site assessment process, the SA has appraised this additional site to inform the Regulation 19 public consultation.
- 3.2.3 Prior to this SA Report being compiled, a Scoping Report was produced in August 2022 which set out the scope and rationale of the SA process and was used to consult the views of the three statutory consultees on that scope, namely the Environment Agency, Natural England and Historic England. Following this, the draft MSP as proposed with the additional new site proposed for allocation on Land South and West of Hermitage Quarry was subject to SA and an SA Report published in May 2023 which set out the sustainability impacts of the draft MSP.
- 3.2.4 This SA Report has been produced in order to address the statutory appraisal questions as detailed in **Table 3.1**, to ensure that an MSP updated to include the new site proposed for allocation has been assessed, any matters of significance noted and mitigation proposed if appropriate.

Table 3.1 – Questions that must be answered (sequentially) within the SA Report

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 is 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 is the situation now?	“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 the 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 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 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))

3.3 Compliance with the SEA Directive and Regulations

3.3.1 The process of preparing an 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).

3.3.2 This SA was designed and undertaken 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.

3.3.3 **Table 3.2** 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.

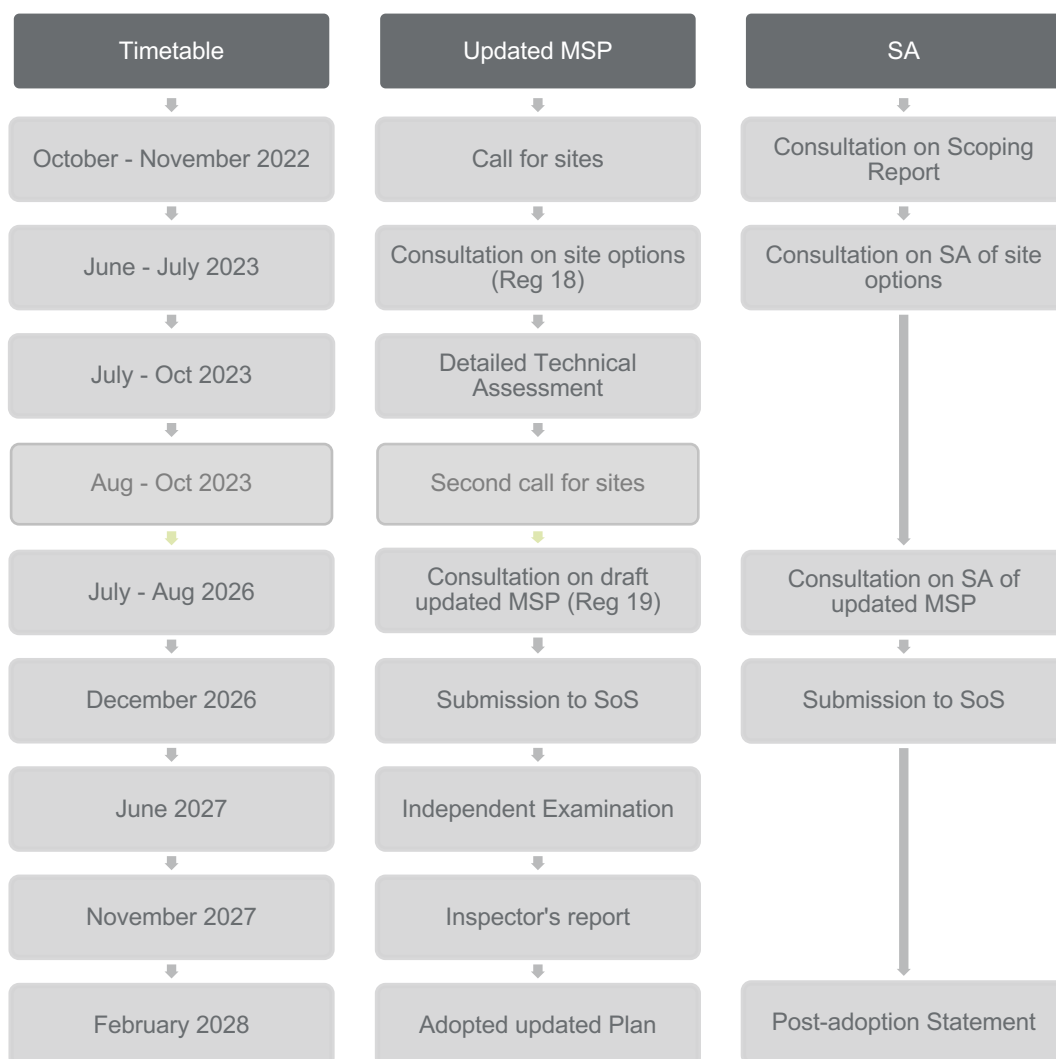
Table 3.2 – Requirements of SEA Directive and Compliance of SA Report

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 4.1
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Sections 4.3 and 4.4
c) The environmental characteristics of areas likely to be significantly affected;	Section 4.6
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 4.3, 4.5 and 4.7
e) 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;	Section 4.2
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 7 and Appendices C and D
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 C
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 5 and 6

i) a description of measures envisaged concerning monitoring in accordance with Art. 10:	Section 8
j) a non-technical summary of the information provided under the above headings	Section 2

3.3.4 The key steps in the preparation of an updated MSP and an associated SA are set out in **Figure 3.1**.

Figure 3.1 – Updating MSP and SA Preparation Process



4.0 THE SCOPE OF THE SUSTAINABILITY APPRAISAL

4.1 What is the Plan Seeking to Achieve?

4.1.1 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 currently allocated within the adopted MSP:

- i) M3 Chapel Farm
- ii) M10 Moat Farm
- iii) M13 Stonecastle Farm Quarry Extension.

4.1.2 The main objective of the adopted MSP is to ensure that Kent has enough permitted mineral reserves over the plan period (until 2039) and 7 years beyond (for sand and gravel), to meet plan making requirements. Sites M3 is a soft sand site and M10 and M13 are sharp sand and gravel sites.

4.1.3 The 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 which have since been removed from the KMWLP. The KMWLP identifies that the specific sites for minerals developments would be set out in the separate MSP. The selection of sites was based on the policies of the KMWLP and sites proposed for development are required to comply with the policies of the KMWLP.

4.1.4 The KMWLP is a high-level document which:

- i) sets out the vision and strategy for mineral provision and waste management in Kent;
- ii) contains a number of development management policies for evaluating minerals and waste planning applications;
- iii) considers strategic site provision for all minerals and waste management facilities; and identifies one site (Dungeness) where key (strategic) waste development should take place. These have been fully assessed previously and therefore are not subject to this SA.

4.1.5 In 2021, KCC completed a five year review of the KMWLP. This five year review identified the need for updates to the KMWLP including a change to the timeframe

covered by the KMWLP, from 2024 to 2039 (previously 2013-30). It became clear that, with this extended timeframe, there are not sufficient permitted reserves in the adopted Mineral Sites Plan⁷ to maintain a 10 year landbank⁸ for hard rock, as required by national policy, and there is therefore a need to identify new suitable reserves of hard rock in the form of one or more additional site allocations in the Mineral Sites Plan. A Call for Sites was therefore undertaken in October 2022⁹, which resulted in the following additional site being nominated by the site promoter for inclusion in the MSP:

i) Land to the South and West of Hermitage Quarry

- 4.1.6 In addition to the change to the timeframe of the KMWLP, a number of other changes were made to the policies and supporting text of the KMWLP as part of the five year review. The KMWLP as amended by the five year review was subject to a separate, parallel SA process and was adopted by KCC in March 2025.
- 4.1.7 The government has published the National Planning Policy Framework (December 2024), 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 needs to be prepared in compliance with the National Planning Policy Framework (NPPF).
- 4.1.8 The current piece of work is to undertake SA of an MSP updated to include the new site proposed for allocation on Land South and West of Hermitage Quarry to inform a Regulation 19 consultation on the draft, which must be in conformity with the overarching KMWLP. Rather than being a strategy document, the MSP identifies sites which meet with the KMWLP'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.

⁷ Mineral Sites Plan, Kent County Council, September 2020

⁸ A landbank is a stock of mineral reserves with planning permission for their winning and working.

⁹ A second Call for Sites took place between August and October 2023 but this did not result in the nomination of any further sites.

4.2 What is the Sustainability Context?

- 4.2.1 This section sets out a review of the national policy context relevant to the MSP. It describes the policy objectives relating to sustainable development in the key policy documents and which have relevance to the MSP. Other relevant policy documents were reviewed for the SA Scoping Report and are set out in Appendix A to that report. Given the elapsed time since the Scoping Report was published, an update to that policy review has been undertaken for this current SA Report. This identified a number of new policy documents of relevance and these have been reviewed to ensure the SA appraisal framework used to appraise the draft MSP reflects recent policy developments. The findings of that review are set out in **Appendix A** of this report.

National Planning Policy Framework, December 2024

- 4.2.2 The National Planning Policy Framework (NPPF) sets out the government's planning policies for England and how these should be applied by local planning authorities. At the heart of the framework is the presumption of sustainable development (Paragraph 11). Achieving sustainable development means that the planning system has three overarching objectives – economic, social and environmental – which should be delivered through the KMWLP and MSP.
- 4.2.3 The extracts below from the NPPF summarises policies that are most relevant to the assessment, allocation and development of mineral sites.

Economy

- 4.2.4 Significant weight should be placed on the need to support economic growth and productivity. Planning policies should positively and proactively encourage sustainable economic growth, allow for new and flexible working practices, and enable a rapid response to changes in economic circumstances.

Open space

- 4.2.5 Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users.

Transport

- 4.2.6 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 and the environment can be addressed, including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains.
- 4.2.7 In assessing sites that may be allocated for development in plans, it should be ensured that: sustainable transport modes are prioritised; safe and suitable access to the site can be achieved for all users; and any significant impacts from the development on the transport network or on highway safety can be cost effectively mitigated to an acceptable degree.

Green Belt

- 4.2.8 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.

Land Use

- 4.2.9 Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. 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

- 4.2.10 Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating and drought from rising temperatures. Policies should support appropriate measures to ensure the future health and resilience of communities and infrastructure to climate change impacts. New development should be planned for in ways that avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken

to ensure that risks can be managed through suitable adaptation measures, including through incorporating green infrastructure and sustainable drainage systems.

- 4.2.11 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.
- 4.2.12 Development should only be allowed in areas at risk of flooding where it can be demonstrated that:
- i) 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;
 - ii) the development is appropriately flood resistant and resilient;
 - iii) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;
 - iv) any residual risk can be safely managed; and
 - v) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.

Natural environment

- 4.2.13 Planning policies and decisions should contribute to and enhance the natural and local environment by:
- i) 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);
 - ii) 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;
 - iii) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
 - iv) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

- v) 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
 - vi) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.
- 4.2.14 When determining planning applications, development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.
- 4.2.15 Planning policies and decisions should ensure that a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination.
- 4.2.16 Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:
- i) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life;
 - ii) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and
 - iii) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.
- 4.2.17 Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement.

Heritage assets

- 4.2.18 Great weight should be given to the conservation of heritage assets. Any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification.

Minerals

- 4.2.19 Planning policies should:
- i) 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;
 - ii) 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;
 - iii) safeguard mineral resources by defining Mineral Safeguarding Areas and Mineral Consultation 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);
 - iv) 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;
 - v) 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;
 - vi) 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;
 - vii) 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

- viii) 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

- 4.2.20 The NPPF should be read in conjunction with the Government's separate National Planning policy for Waste.

Environmental Improvement Plan 2025

- 4.2.21 The 25 Year Environment Plan¹⁰ (25YEP) published in 2018 set out the Government's vision for action to help the natural world regain and retain good health. This Environmental Improvement Plan 2025 is the second review of the 25YEP. It reinforces the intent of the 25YEP: where the 25YEP set out the framework and vision, this document sets out the plan to deliver.
- 4.2.22 To achieve its vision, the 25YEP set ten goals. These are slightly amended and reframed in the 2025 Plan but remain broadly similar. The apex goal is restored nature. In order to achieve this, the Government will aim to achieve the following:
- i) Goal 1: Restored nature – create a network of bigger, better and more resilient habitats to help nature thrive;
 - ii) Goal 2: Air – achieve clean air
 - iii) Goal 3: Water – ensure English waters are clean, resilient and plentiful;
 - iv) Goal 4: Chemicals and pesticides – minimise environmental risks from chemicals and pesticides;
 - v) Goal 5: Waste – minimise waste by designing it out of the system, reusing and recycling materials wherever possible;
 - vi) Goal 6: Resources – ensure that natural resources are produced, managed and consumed sustainably;
 - vii) Goal 7: climate change – reduce greenhouse gas emissions to accelerate to net zero and work to prepare the natural environment for the effects of climate change;

¹⁰ A Green Future: Our 25 Year Plan to Improve the Environment, Defra, 2018

- viii) Goal 8: Reducing environmental hazards – reduce the risk of harm to people, the environment and the economy from natural hazards;
- ix) Goal 9: Biosecurity – enhance biosecurity to protect our natural environment and boost the health and resilience of plants, animals, ecosystems and people;
- x) Goal 10: Access to nature – ensure inclusive access to nature and protect nature's beauty and heritage.

Our Waste, Our Resources: A Strategy for England, 2018

- 4.2.23 The Strategy recognises that natural capital is one of our most valuable assets and sets out how the government plans to preserve the stock of material resources by minimising waste, promoting resource efficiency and moving towards a circular economy. The Strategy also sets out the aim to minimise damage to the natural environment and is aligned to the UK Government's 25 Year Environment Plan.
- 4.2.24 The government will address information barriers to the use of secondary materials as one element of the strategy.

Planning Practice Guidance – Minerals, MHCLG, 2014

- 4.2.25 The guidance sets out how mineral planning authorities should develop planning policies for the management of mineral extraction, supply, processing and transport and the issues that must be taken into consideration. It states that mineral planning authorities should plan for the steady and adequate supply of minerals in one or more of the following ways (in order of priority):
 - i) Designating Specific Sites – where viable resources are known to exist, landowners are supportive of minerals development and the proposal is likely to be acceptable in planning terms. Such sites may also include essential operations associated with mineral extraction
 - ii) Designating Preferred Areas, which are areas of known resources where planning permission might reasonably be anticipated. Such areas may also include essential operations associated with mineral extraction; and/or
 - iii) Designating Areas of Search – areas where knowledge of mineral resources may be less certain but within which planning permission may be granted, particularly if there is a potential shortfall in supply.

- 4.2.26 The suitability of each proposed site, whether an extension to an existing site or a new site, must be considered on its individual merits, taking into account issues such as:
- i) need for the specific mineral;
 - ii) economic considerations (such being able to continue to extract the resource, retaining jobs;
 - iii) being able to utilise existing plant and other infrastructure);
 - iv) positive and negative environmental impacts (including the feasibility of a strategic approach to restoration); and
 - v) the cumulative impact of proposals in an area.
- 4.2.27 Planning authorities should also safeguard existing, planned and potential storage, handling and transport sites to:
- i) ensure that sites for these purposes are available should they be needed; and
 - ii) prevent sensitive or inappropriate development that would conflict with the use of sites identified for these purposes.
- 4.2.28 The principal issues that mineral planning authorities should address, bearing in mind that not all issues will be relevant at every site to the same degree, include:
- i) noise associated with the operation;
 - ii) dust;
 - iii) air quality;
 - iv) lighting;
 - v) visual impact on the local and wider landscape;
 - vi) landscape character;
 - vii) archaeological and heritage features;
 - viii) traffic;
 - ix) risk of contamination to land;
 - x) soil resources;
 - xi) geological structure;
 - xii) impact on best and most versatile agricultural land;
 - xiii) blast vibration;
 - xiv) flood risk;
 - xv) land stability/subsidence;

- xvi) internationally, nationally or locally designated wildlife sites, protected habitats and species, and ecological networks;
- xvii) impacts on nationally protected landscapes (National Parks, the Broads and Areas of Outstanding Natural Beauty);
- xviii) nationally protected geological and geo-morphological sites and features;
- xix) site restoration and aftercare;
- xx) surface and, in some cases, ground water issues;
- xxi) water abstraction.

Climate Change Act 2008 (2050 Target Amendment) Order 2019

- 4.2.29 The Act sets out a legal framework to commit the government to tackling climate change, including through the setting of five-yearly carbon budgets to drive decarbonisation. Climate change adaptation is also covered in the Act as it provides a legal framework for adaptation policy. The amendment introduces the national target for net zero carbon emissions by 2050, which increases the required percentage reduction of greenhouse gas emissions from at least 80% to at least 100% from the 1990 baseline in the UK by 2050.

Planning and Compulsory Purchase Act 2004

- 4.2.30 Section 19 of the Planning and Compulsory Purchase Act requires local planning authorities to include in their Local Plans policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.

The Environment Act 2021

- 4.2.31 The Environmental Governance Part of the Environment Act (Part 1) includes provisions to:
- i) allow the government to set long-term targets (of at least 15 years duration) in relation to the natural environment and people's enjoyment of the natural environment via statutory instrument;
 - ii) require the government to meet long-term targets, and to prepare remedial plans where long-term targets are not met;
 - iii) require the government to set, by October 2022, at least one long-term target in each of the priority areas of air quality, water, biodiversity, and resource efficiency and waste reduction;

- iv) require the government to set and meet an air quality target for fine particulate matter in ambient air (PM2.5);
- v) require the government to set and meet a target relating to the abundance of species;
- vi) require the government to have, and maintain, an Environmental Improvement Plan, a plan to significantly improve the natural environment;
- vii) require the publication of a policy statement on environmental principles setting out how environmental principles specified under the Act are to be interpreted and applied by Ministers of the Crown during the policymaking process.

4.2.32 The Waste and Resource Efficiency Part of the Environment Act (Part 3) includes provisions to:

- i) require producers to pay the full net cost of managing their products at end of life to incentivise more sustainable use of resources;
- ii) allow deposit return schemes to be established, whereby a deposit is included in the price of an in-scope item (such as a drink in a bottle or can);
- iii) enable producer responsibility obligations to be applied at all levels of the waste hierarchy to, for example, facilitate the prevention of food waste and increase the redistribution of food surplus;
- iv) enable charges to be applied to specified single-use items;
- v) require local authorities in England to collect the same range of materials for recycling from households;
- vi) ensure households have a weekly separate food waste collection;
- vii) ensure businesses and public bodies in England present recyclable materials for separate collection and arrange for its separate collection;
- viii) allow the Environment Agency to be more flexible and responsive in managing exempt waste sites and ensure proportionate controls are in place to avoid environmental harm or illegal activity as waste market practices change;
- ix) fill a gap in existing powers to ensure that waste can be collected and disposed of when normal processes fail;
- x) enable the Secretary of State to regulate the import, export or transit of waste for export, and hazardous waste.

4.2.33 The Air Quality and Environmental Recall Part of the Environment Act (Part 4) includes provisions to:



- i) amend Part 4 of the Environment Act 1995 (which creates the Local Air Quality Management Framework) to strengthen the requirements in respect of the National Air Quality Strategy;
- ii) amend the Local Air Quality Management Framework to clarify duties and enable greater cooperation between different levels of local government, and other relevant public bodies, in the preparation of Local Air Quality Action Plans;

4.2.34 The Water Part of the Environment Act (Part 5) includes provisions to:

- i) change the procedural requirements for Water Resources Management Plans and Drought Plans, and enable increased collaboration between different water undertakers to better manage water resources;
- ii) place new duties on government, the Environment Agency and sewerage undertakers to require actions for reducing the frequency and harm of discharges from storm overflows on the environment;
- iii) enable future updates to the lists of priority substances in water quality legislation.

4.2.35 The Nature and Biodiversity Part of the Environment Act (Part 6) includes provisions to:

- i) amend section 40 of the Natural Environment and Rural Communities Act 2006 to strengthen and improve the duty on public bodies to conserve and enhance biodiversity;
- ii) mandate net gain in biodiversity through the planning system, requiring a 10% increase in biodiversity after development, compared to the level of biodiversity prior to the development taking place;
- iii) require the preparation and publication of Local Nature Recovery Strategies, a tool to direct action for nature, and place an emphasis on supporting local leadership of nature improvement;
- iv) provide for Species Conservation and Protected Site Strategies to improve the conservation and protection of the most vulnerable species and habitats;
- v) provide powers to amend Regulation 9 and Part 6 of the Conservation of Habitats and Species Regulations 2017 to re-focus the Regulations to support delivery of domestic biodiversity priorities.

Climate Emergency Statement, KCC, 2019

- 4.2.36 “We recognise the UK environment and climate emergency and will continue to commit resources and align its policies to address this. Through the framework of the Energy and Low Emissions Strategy, we will facilitate the setting and agreement of a target of net zero emissions by 2050 for Kent and Medway.
- 4.2.37 “We will, by May 2020, set an accelerated target with associated action plan for its own estate and activities including those of its traded companies using appropriate methodologies. In addition, we will deliver a Kent and Medway Climate Change Risk and Impact Report and develop and facilitate adoption of a subsequent Kent and Medway Climate Change Adaptation Implementation Plan by the end of March 2020.”

Kent and Medway Low Emissions Strategy, 2020

- 4.2.38 The strategy has four strategic aims:
- i) Evidence: Provide an ongoing evidence and intelligence base; linking data sets to identify hot spots and opportunities, and to build the business case for action across Kent and Medway
 - ii) Policy and strategy: Facilitate the development of evidence-based policy and strategy to future-proof economic recovery, tackle emerging issues and realise opportunities
 - iii) Leadership: Support the public sector across Kent and Medway to play a strong leadership role with regards to challenges and opportunities
 - iv) Action: Facilitate increased and accelerated action and implementation across Kent and Medway
- 4.2.39 The strategy has ten priorities, including the following relevant to the MSP:
- i) Priority 1: Emission reduction pathways to 2050: Set five-year carbon budgets and emission reduction pathways to 2050 for Kent and Medway, with significant reduction by 2030.
 - ii) Priority 2: Public sector decision making: Develop a consistent approach across Kent and Medway, to assess, manage and mitigate environmental impacts (both positive and negative), resulting from public sector policies, strategies, service delivery, commissioning and procurement.

- iii) Priority 3: Planning and development: Ensure climate change, energy, air quality and environmental considerations are integrated into Local Plans, policies and developments, by developing a clean growth strategic planning policy and guidance framework for Kent and Medway, to drive down emissions and incorporate climate resilience.
- iv) Priority 6: Transport, travel and digital connectivity: Set up a smart connectivity and mobility modal shift programme – linking sustainable transport, transport innovations, active travel, virtual working, broadband, digital services, artificial intelligence and behaviour change.
- v) Priority 8: Green infrastructure: Develop a multi-functional, natural capital opportunity and investment programme – focusing on environmental projects that store carbon, increase climate change resilience, improve air quality and soil health and increase biodiversity.

***Kent Environment Strategy: a Strategy for Environment, Health and Economy
Implementation Plan, KCC, 2017***

- 4.2.40 The strategy and associated implementation plan seek to provide support to decision makers in ensuring that the county of Kent remains the highly desirable location of choice for visitors, residents and businesses. The strategy seeks to build on past successes and learn from experiences; evaluating progress, bridging gaps in knowledge and delivering activities that have positive benefits for the environment, health and economy.
- 4.2.41 The strategy is split into three themes, each of which has several policy priorities identified under it. Challenges, learning and opportunities underpin the priorities identified in the themes of the strategy. Relevant to the MSP are the following:
- i) Theme 2 Making best use of existing resources, avoiding or minimising negative impacts:
 - a. Priority 5 Conserve and enhance the quality and supply of the county of Kent's natural and historical resources and assets
 - b. Priority 6 Improve our resource efficiency such as energy, water and land
 - c. Priority 7 Ensure sustainable access and connectivity for businesses and communities
 - ii) Theme 3 Toward a sustainable future
 - a. Priority 8: Influence future sustainable growth for the county of Kent

- b. Sub-priority 8.1: Ensure that key environmental risks such as flooding, water scarcity and heat are informing policy decisions and development
 - c. Sub-priority 8.2: 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
 - d. Priority 9: Improve the county of Kent's environmental, social and economic resilience to environmental change
 - e. Sub-priority 9.2: Ensure that public sector services have assessed key environmental and severe weather risks and opportunities and are taking action accordingly
 - f. Priority 10: Supporting growth in the rural economy and low carbon and environmental services sector
 - g. Sub-priority 10.2: Maximise opportunities for the rural sector
- iii) Evidence: Provide an ongoing evidence and intelligence base; linking data sets to identify hot spots and opportunities, and to build the business case for action across Kent and Medway
 - iv) Policy and strategy: Facilitate the development of evidence-based policy and strategy to future-proof economic recovery, tackle emerging issues and realise opportunities
 - v) Leadership: Support the public sector across Kent and Medway to play a strong leadership role with regards to challenges and opportunities
 - vi) Action: Facilitate increased and accelerated action and implementation across Kent and Medway

Framing Kent's Future: Our Council Strategy 2022-2026, Kent County Council, May 2022

4.2.42 The new Council Strategy was adopted in May 2022 and includes the following commitments:

- i) To support the Kent economy to be resilient and successfully adapt to the challenges and opportunities it faces over the coming years.
- ii) To see significant improvements in the economy, connectivity, educational attainment, skills and employment rates and public health outcomes in deprived communities in coastal areas so that they improve faster than the rest of Kent to reduce the gaps.

- iii) To work with our partners to hardwire a preventative approach into improving the health of Kent's population and narrowing health inequalities.
- iv) To ensure that new development provides the appropriate physical and social infrastructure necessary to support new and existing communities' quality of life.
- v) To support our rural communities and businesses in meeting the distinctive challenges and opportunities that they face.
- vi) To ensure residents have access to viable and attractive travel options that allow them to make safe, efficient and more sustainable journeys throughout Kent.
- vii) To help all Kent's communities benefit from having a strong social fabric which underpins family, community and personal resilience.
- viii) To consider Kent's environment as a core asset that is valued, strengthened and protected.
- ix) To work towards Kent being Net Zero by 2050.
- x) To support Kent to become a leading county for carbon zero energy production and use.
- xi) To ensure the county is well placed to adapt to climate change.

4.2.43 The key conclusions drawn from this review are that the appraisal framework which was used to assess the draft updated KMWLP in August 2022 requires amendment to ensure it is appropriate for appraising an MSP updated to include the new site proposed for allocation on Land South and West of Hermitage Quarry. Additional appraisal criteria should be added to include objectives to:

- i) promote sustainable drainage management;
- ii) restore land quality;
- iii) enhance National Landscapes (AONBs);
- iv) compensate for the loss of irreplaceable habitat.

4.3 What is the situation now (sustainability 'baseline')?

4.3.1 The following is a summary of the sustainability baseline characteristics based on what was described in the Scoping Report. This has been informed by the previous SA work on the KMWLP and the review of baseline data undertaken for the Scoping Report, and updated to take into account the availability of more recent data since the Scoping Report was published.

4.3.2 Environmental baseline:

- i) After a gradual rise in the amount of residual waste collected per person in Kent, it has fallen recent years, from 426.4 kg in 2021/22 to 406.5 kg in 2023/24. Less than half (39%) of household waste was reused, recycled or composted in 2022/23 and less than 1% is landfilled. Most of the remainder is incinerated with energy recovery.¹¹ Some 6.58 million tonnes of waste of all kinds (the majority being construction and demolition waste) were reported as being managed at Kent waste management facilities in 2022. This compares with around 1.49 million tonnes of Kent waste managed outside the county. However, this export is more than offset by imports, so taking a simple balance, Kent remains net self-sufficient. Of the imports, just over 700,000 tonnes came from London, almost double that in 2021, although the latest KMWLP Annual Monitoring Report for 2022/3 confirms that Kent can plan for a reducing provision for the management of London's waste over time.
- i) Construction aggregates (sand, gravel and ragstone) are the main types of economically important minerals extracted in Kent at this time, although brickearth (for stock brick manufacture), clay (for tile manufacture and engineering clay) and chalk (for engineering and agricultural lime applications) is also extracted. This is supplemented with imports and recycled aggregates. In the past, the consented reserves of hard (crushed) rock of the Hythe Formation in Kent were considered as being so extensive there was no need to consider future supply needs and no sites were proposed in the Mineral Sites Plan that was adopted in 2020. Since that time, however, the extent of the reserve base, in terms of its recent marked decline, has been apparent. The implications of this and the adopted KMWLP Plan period to 2039 are such that there is a predicted shortfall of available reserves at the maintained 'at least' 10-year level for, and at the end of, the Plan period (2024- 2039).
- ii) 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.
- iii) Natura 2000 habitat is concentrated around the coast, particularly around the Thames Gateway (much within Medway UA), the Isle of Thanet, the Stour

¹¹ <https://www.gov.uk/government/statistical-data-sets/env18-local-authority-collected-waste-annual-results-tables>

Estuary and Dungeness. Sites of Special Scientific Interest (SSSI) cover 9.8% of the county. The county contains c.11% of England's ancient woodland, the largest amount in England.

- iv) The Thames Gateway is also acknowledged for its national importance due to 'brownfield' biodiversity.
- v) 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 built development or intensive farming, which has reduced and fragmented populations; and the effects of climate change.
- vi) Kent is considered to be the most at risk 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.
- vii) Since 2006 there has been a steady reduction in carbon dioxide emissions, to 3.9 tonnes per capita in 2023. This is slightly lower than UK emission levels of 4.1 tonnes per capita.
- viii) The annual report of the Kent and Medway Air Quality Partnership¹² reports that NO₂ concentrations remain below pre-pandemic levels, PM₁₀ and PM_{2.5} concentrations are above the UK average but showing a general decreasing trend, and SO₂ levels closely follow the overall decreasing UK trend.
- ix) Kent has the highest number of listed buildings in the South East, and is third highest of all counties in England behind only Devon and Greater London.
- x) The Kent Downs National Landscape covers nearly a quarter of the County, whilst the High Weald National Landscape is shared with East Sussex.
- xi) Green Belt comprises the majority of Sevenoaks, Tonbridge and Malling and Gravesham Districts, as well as a proportion of Tunbridge Wells and Dartford Boroughs and a small part of Maidstone Borough.
- xii) There are relatively extensive areas of excellent (grade one) agricultural land in Kent. This land tends to be concentrated in the north of the county, running in a band from Gillingham in the west through to Deal in the east. Pockets can also be found in the area surrounding New Romney, to the west of Maidstone and north east of Ashford. Good or very good quality agricultural land can be found in many parts of Kent.

¹² <https://www.kentair.org.uk/report/kent-and-medway-2024-network-annual-report>

- xiii) Road traffic has grown fairly steadily over the years, apart from 2020 when COVID-19 particularly affected car traffic. The effect on LGVs and HGVs was less marked, although still showed a decrease. Kent is a major gateway for the movement of international freight through the Channel Tunnel, the ports of Dover, Ramsgate and Sheerness. Road haulage is the dominant means of transport in this sector.
- xiv) Pressures on water availability 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. Water stress poses long term risk to housing development, economic growth, tourism and everyday water access for residents. It also threatens the county's rich natural habitats and biodiversity. The majority of catchments within Kent in 2022 were of moderate ecological status, largely similar to the status in 2019¹³.

4.3.3 Social baseline:

- i) Kent will have an estimated population of 1,653,893 in mid-2026. By 2039, the population of Kent is projected to increase to 1,778,618, an increase of c. 7.5%.
- ii) Significant areas within Kent are amongst England's most deprived 30% of local authorities, measured by the Indices of Multiple Deprivation. Thanet is ranked among England's 10% most deprived local authorities. Canterbury, Dover and Tunbridge Wells have all become more deprived compared to other English local authorities since 2019, while Dartford and Swale have become less deprived.
- iii) Life expectancy is 9 years lower for men and 7 years lower for women in the most deprived populations in Kent compared to the least deprived populations.
- iv) Mortality rates from cancer and cardiovascular disease have fallen and are better than the England average. Nearly a quarter (23%) of children aged 4-5 are classified as being obese, higher than the average for England (22%). However, estimated levels of adult obesity in Kent (25.6%) are lower than the England average (26.5%) but increasing (an increase of 2.5% since 2016).
- v) Climate change projections highlight an increase in risk to people from flooding and hotter, drier summers leading to public health risks.

¹³ <https://environment.data.gov.uk/catchment-planning/>

4.3.4 Economic baseline:

- i) In 2022, the gross disposable household income in Kent was £24,341 per head, 4.3% above the national average.
- ii) Between 2021 and 2025, the number of active enterprises shrank by 1%, to 68,910, which slightly better than the national average which shrank by 4%.
- iii) The overall employment rate in Kent has risen since the KMWLP was adopted, from 73.8% in 2016 to 75.7% in 2025.
- iv) Apart from slight declines in 2008-2009 and 2022, GVA per head in Kent and Medway has risen steadily in the 21st century. In 2025 it was £29,379 per head, up from £14,029 in 2000, a rise of 109%. However, per capita GVA is lower than for the South East as a whole and for England.
- v) The largest sector for employment in 2024 was wholesale and retail trade at 16.2%, followed by human health and social work at 13.9% and education at 9.4%. The distribution sector generated the highest gross value added in Kent in 2023, a fifth of the total.

4.4 How would the baseline change without an MSP updated to include the new proposed site?

- 4.4.1 There is a degree of uncertainty about how the baseline might change without the adoption of an MSP updated to include the new site proposed for on land S & W of Hermitage Quarry. Proposals for development of new mineral sites could still come forward and these will be required to comply with the policies of the KMWLP. This includes development management 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.
- 4.4.2 However, without an MSP updated to include the new site proposed for allocation there will be less certainty that Kent would be able to provide enough hard rock to support the expected future demand for minerals from construction and industry, particularly for the restoration of historic buildings. 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 may have adverse effects on transport networks and air quality and may be difficult to blend in with existing Kentish stone in buildings.

It is unlikely that secondary and recycled aggregates or marine dredged aggregates would meet the specification required.

4.4.3 Without an MSP updated to include the new site proposed for allocation, imports from other parts of the country may be required. This could lead to increased carbon dioxide emissions from mineral transport and associated risks to people and communities.

4.4.4 The social baseline is unlikely to be affected without the adoption of an MSP updated to include the new site proposed for allocation. Population, levels of deprivation and health are unlikely to be significantly different with or without an MSP updated to include the new site proposed for allocation, although jobs will be lost at the existing operational quarry when the permitted resource is exhausted.

4.5 What are the key sustainability issues?

4.5.1 Following review of context and baseline, the SA Scoping Report set out the key sustainability issues in Kent. This has been revisited to take account of new policy developments and any shifts in the baseline identified above in **Section 4.3**. The key sustainability issues identified are set out in the next paragraphs.

4.5.2 Biodiversity:

- i) 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.
- ii) 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.
- iii) Biodiversity benefits relate to the minerals and waste development management strategy, which is set to ensure that negative effects associated with minerals extraction and waste management are avoided or mitigated, and the potential for minerals and waste development to contribute to biodiversity objectives is realised.

4.5.3 Climate change:

- i) There is the potential to promote technologies that increase the carbon efficiency of minerals and waste operations, including increased reuse and recycling of both waste and minerals.
- ii) Transport is a significant contributor to greenhouse gas emissions that should be addressed through the plan.

4.5.4 Community and well-being:

- i) Clear spatial variation across Kent exists in terms of income, employment and health deprivation.
- ii) The highest levels of deprivation can be seen in both coastal regions and urban areas.
- iii) Deprivation is focused amongst particular socio-economic groups.
- iv) Community impacts associated with the proximity of quarries and also lorry movements is an issue of strategic importance.
- v) Traffic on the motorway and A-road network is the cause of the majority of designated Air Quality Management Areas (AQMAs).
- vi) 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.
- vii) There remain instances where point source air pollution is a strategic issue.

4.5.5 Sustainable economic growth:

- i) There are ambitious plans for economic growth and regeneration, for example in East Kent and the Kent Thames Gateway.
- ii) There are local disparities in economic activity (including problems of 'rurality')
- iii) 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.

4.5.6 Flood risk:

- i) There is extensive flood risk in Kent, and this situation is set to become worse with climate change.



4.5.7 Land:

- i) 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.
- ii) 'Land' and 'landscape' benefits relate to the support that is provided for construction and demolition waste 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.

4.5.8 Landscape and the historic environment:

- i) 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).
- ii) 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' and an increase in levels of light pollution.
- iii) Specific landscape impacts can be associated with minerals and waste development. Appropriate restoration should be sought to mitigate effects.
- iv) There is a need to take account of designated heritage assets and their settings as well as undesignated assets and wider historic character.
- v) Heritage / historic environment benefits (which are relatively small magnitude and hence of unclear significance) relate to the support that is provided by extraction of minerals for heritage building products with a view to maintaining a diverse supply.
- vi) There remains ongoing debate about the potential for impacts to National Landscapes, e.g. from silica sand extraction, but the stringency of policy has been strengthened and so effects are now unlikely.

4.5.9 Transport:

- i) Much of the primary road network operates at, or above, capacity and there is a shortage of freight paths on the rail network.
- ii) There is a need to adhere to the proximity principle wherever possible.

- iii) There is a need to increase the amount of waste and, in particular, minerals transported by alternatives to road.
- iv) A regional strategy is in place to improve the transport infrastructure within and to Kent. The related Investment Plan, currently still draft, proposes several packages for investment in Kent relating to improving rail infrastructure and bus and ferry services, creating a Lower Thames Crossing and providing highway improvements.
- v) '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 ongoing importation of marine dredged aggregates, crushed rock and other minerals by sea and rail, rather than by road.

4.5.10 Water:

- i) Water quality and availability is set to become a greater problem in coming years as a result of population growth, climate change and the need to comply with water quality standards.
- ii) Groundwater and surface water pollution from a range of sources is evident across much of Kent.

4.5.11 Waste:

- i) Amounts of household waste generated in Kent have fallen in recent years. Less than half (39%) was recycled in 2022/23 and the 55% target for 2025/6 may fall short. The target for landfill reduction (no more than 2%) continued to be surpassed. The remainder of Kent's Local Authority Collected Waste was incinerated with energy recovery.
- ii) It is anticipated that Commercial and Industrial waste will continue to increase.
- iii) Kent remains net self-sufficient in waste management capacity.
- iv) Illegal waste disposal continues to be an issue across Kent, creating major health and safety issues.

4.6 Characteristics of Areas Likely to be Significantly Affected

- 4.6.1 The SEA Directive requires that the appraisal describes the characteristics of areas likely to be significantly affected by an MSP updated to include the new site proposed for allocation on Land South and West of Hermitage Quarry. In this case, areas likely to be affected are in the vicinity of each of the sites either already allocated or proposed for allocation. The characteristics of the four sites are described in the following paragraphs.
- 4.6.2 The new site proposed for allocation which forms an extension to Hermitage Quarry is on land designated as either grade 2 agricultural land (very good) or ancient replanted woodland. Some of the land is also designated as a Local Wildlife Site, some contains biodiversity priority habitats and some has local landscape significance. It is underlain by aquifers and has groundwater vulnerability, but low flood risk. There are a number of residential dwellings in proximity to the site and several listed buildings, and there may be below-ground palaeolithic interest. There is a Public Right of Way that crosses the site, and it is adjacent to a SSSI of geomorphological importance. Two AQMAs are fairly close to the site, one adjacent and one on major roads through the Borough.
- 4.6.3 Site M3 (Chapel Farm) is a previously unworked site rather than an extension to an existing site, situated in countryside to the south east of Lenham between junctions 8 and 9 of the M20. The site is an area of open landscape rising from Lenham Heath Road towards the A20 and is within the setting of the Kent Downs National Landscape. The site is grade 2 agricultural land and is adjacent to ancient woodland, priority habitats with notable species, and three Local Wildlife Sites. Footpaths cross the site. There are a small number of residential dwellings and listed buildings in proximity to the site. The site overlies an aquifer and is partly in a Source Protection Zone 3 for a public water abstraction borehole. It also overlies a length of the River Stour. Sewerage infrastructure crosses the site, and a wastewater treatment works is adjacent. Any planning application must be accompanied by adequate proposals to show the sewerage infrastructure will not be adversely affected.
- 4.6.4 Site M10 (Moat Farm) is an extension to existing quarrying operations situated in countryside to the north of Five Oak Green near Tonbridge and the River Medway. It is predominantly arable fields (predominantly grade 3b) surrounded by hedgerows and ditches, potentially with notable species and with an area of ancient woodland

to the north of the site. Footpaths cross the site and there is a residential property near the site. It is located in Green Belt and an area of flood risk. The site overlies an aquifer and lies partially within a groundwater source protection zone. The Alder Stream and smaller ditches run through the site.

- 4.6.5 Site M13 (Stonecastle Farm Quarry Extension) is in countryside to the north west of Five Oak Green near Tonbridge, adjacent to the River Medway. It is a large arable field (predominantly grade 3b) with hedgerows within and surrounding the site, adjacent to a Local Wildlife Site and ancient woodland. There are areas of biodiversity priority habitat within and adjacent to the site which have the potential to contain notable species. A public right of way runs near to the site. The site is within the Green Belt and an area of flood risk and extends into groundwater source protection zones. There is a listed building near to the site access, and a low potential for archaeological or other historic remains onsite.

4.7 Areas of Particular Environmental Importance

- 4.7.1 Kent contains a number of designated sites of international nature conservation importance. In addition, there are further designated sites outside Kent but within 10km of the county boundary. These sites are listed in the SA Scoping Report. There are two designated sites that are within 10km of the new proposed mineral site:

- i) North Downs Woodland SAC at 6.2km
- ii) Peters Pit SAC at 6.5km

- 4.7.2 The importance of each of these sites is described below.

North Downs Woodland SAC

- 4.7.3 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

- 4.7.4 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

- 4.7.5 A screening opinion¹⁴ has been given by KCC's Ecological Advice Service which concludes that, given the distance of the new site proposed for allocation on Land South and West of Hermitage Quarry from each of these SACs, it is not likely to have any impacts on either SAC and therefore a full Appropriate Assessment is not considered necessary.
- 4.7.6 Regarding the three already allocated sites, these were subject to a Habitats Regulations Assessment prior to their allocation within the adopted MSP. This concluded that none of the three sites were likely to have significant effects on any Natura 2000 site and therefore were screened out from any further assessment.

¹⁴ Draft Habitats Regulations Screening Assessment of the Kent Waste and Minerals Sites Plan, KCC Ecological Advice Service, May 2026

5.0 HOW HAS THE PLAN DEVELOPED UP TO THIS POINT?

5.1 The History of the KMWLP, MSP and SA

5.1.1 The KMWLP was adopted in 2016, following the legally required stages of drafting, consultation and review. The KMWLP is a high-level document which describes:

- i) the overarching strategy and planning policies for mineral extraction, importation and recycling, and the waste management of all waste streams that are generated or managed in Kent, and
- ii) the spatial implications of economic, social and environmental change in relation to strategic minerals and waste planning.

5.1.2 The adopted KMWLP identifies and sets out the following subjects for the period up to, and including, the year 2030:

- i) the long-term Spatial Vision and Strategic Objectives for Kent's minerals and waste;
- ii) the delivery strategy for minerals and waste planning that identifies how the objectives will be achieved in the plan period;
- iii) two areas where strategic mineral and waste development may occur;
- iv) the development management policies that will be used when the County Council makes decisions on planning applications; and
- v) the framework to enable annual monitoring of the policies within the Plan.

5.1.3 Alongside the process of the development of the 2016 KMWLP, an SA was undertaken. As part of this process, a series of reports were published, including a Scoping Report and a final SA Report:

- i) Kent Minerals and Waste Development Framework SA Scoping Report, Scott Wilson, March 2010
- ii) Sustainability Appraisal of the Kent Minerals and Waste Local Plan: SA Report, URS, July 2014

5.1.4 The Scoping Report set out an appraisal framework to be used to assess the effect of the KMWLP and the reasonable alternatives to its proposals on sustainable development in Kent and beyond, the results of which were set out in the SA Report.

- 5.1.5 Following the adoption of the KMWLP in July 2016, further assessments suggested that the level of waste management capacity required to maintain net self-sufficiency had changed. It was therefore expedient to undertake an early partial review of the KMWLP to amend several of the policies relating to waste management. At the same time policy concerned with safeguarding mineral resources and waste and mineral infrastructure was amended to ensure its effectiveness. Alongside the Early Partial Review of the KMWLP, a separate but linked Mineral Sites Plan was developed, which identified and allocated a number of sites for mineral extraction.
- 5.1.6 Both of these documents – the Early Partial Review and the Mineral Sites Plan - were subject to SA. Separate Scoping Reports and SA Reports were produced for each of the Early Partial Review and the Mineral Sites Plan as follows:
- i) Sustainability Appraisal of the Kent MWLP Partial Review: Scoping Report, Amey, November 2017;
 - ii) Sustainability Appraisal of the Kent Minerals Sites Plan-Making Process, Amey, November 2017;
 - iii) Sustainability Appraisal Report – SA of the draft Early Partial Review of the Kent Minerals and Waste Plan: Main Modifications Consultation, Amey, November 2019;
 - iv) Sustainability Appraisal Report – SA of the draft Kent Mineral Sites Plan: Main Modifications Consultation, Amey, November 2019.
- 5.1.7 The Scoping Reports for these SA processes adapted the SA framework used in the earlier SA of the adopted 2016 KMWLP. This was to reflect updates to the policy context relevant to the plans since the KMWLP was adopted and changes in the baseline data describing sustainability conditions in Kent.

5.2 The Most Recent Review of the KMWLP

- 5.2.1 The NPPF and legislation require that Local Plans should be reviewed to assess whether they need updating at least once every five years. Having been adopted five years ago, the Kent Minerals and Waste Local Plan was reviewed to assess whether updates to the Plan were required.
- 5.2.2 The review considered whether the Vision, Strategic Objectives and policies of the Plan were still consistent with national policy and local context and whether the

policies have been effective in achieving the intended outcomes relating to the use of land for minerals and waste development in Kent.

5.2.3 National Planning Practice Guidance (PPG) states that “The review process is a method to ensure that a plan and the policies within remains effective”. The PPG also sets out what authorities should consider when determining whether a Plan or policies should be updated. Information relevant to the most recent KMWLP Review includes:

- i) conformity with national planning policy;
- ii) changes to local circumstances;
- iii) success of policies against indicators in the KMWLP;
- iv) significant economic changes that may impact on viability; and,
- v) whether any new social, environmental or economic priorities may have arisen.

5.2.4 The review considered each of the Vision, the Strategic Objectives and the 52 policies within the KMWLP in turn. It identified the need for changes to the wording of both the Vision and some of the Strategic Objectives to ensure that these remain current and reflective of recent changes. The majority of policies within the KMWLP were also proposed for amendments of different kinds and for various reasons, as well as various amendments to the supporting text and contextual chapters (1 and 2).

5.2.5 Alongside the preparation of the updated KMWLP, an SA process commenced, beginning with the preparation of a Scoping Report¹⁵. The proposed updates to the KMWLP were published for a Regulation 18 consultation in December 2021 and the Scoping Report was also published for consultation at the same time.

5.2.6 As a result of the consultation, it became clear that the timeframe covered by the KMWLP needed to be extended to ensure it continued to cover a 15 year period (to 2039). The extended time period meant that additional permitted reserves of crushed rock are needed in order to maintain a 10 year landbank. In addition, some other amendments to the KMWLP were incorporated at that time.

¹⁵ Sustainability Appraisal of Updates to the Kent Minerals and Waste Local Plan 2013-30 in Light of the Five Year Review: Scoping Report, Amey, October 2021

- 5.2.7 The 2021 consultation was followed by several subsequent consultations on the developing KMWLP, each stage of which was accompanied by an SA Report. In September 2024, an Examination in Public of the updated KMWLP as proposed was held in front of an Inspector. Following the Examination, a number of Main and Additional Modifications were required. An SA report¹⁶ was published in October 2024 for consultation alongside the consultation on the Main Modifications which set out the results of the SA of the updated KMWLP as amended by the modifications.
- 5.2.8 The updated KMWLP was adopted by KCC in March 2025.

5.3 The Draft Update to the MSP

- 5.3.1 The proposed update to the adopted MSP would allocate one or more additional sites, which need to be considered as this would provide greater certainty that additional permitted reserves of crushed rock will be secured and the 10 year landbank can be maintained. An SA is required to be carried out on a draft MSP updated to include a site (or sites) for hard rock, the first stage of which was a Scoping Report¹⁷ published for consultation in October 2022.
- 5.3.2 A number of comments on the Scoping Report were received from consultees, which have been taken into account in the SA process. Appendix B summarises these comments and the response of the SA to them.
- 5.3.3 Alongside the consultation on the Scoping Report, a Call for Sites was undertaken by KCC from October to December 2022, seeking proposals for sites for inclusion within an updated MSP. One site was submitted during the Call for Sites, an extension to the existing permitted quarry at Hermitage Quarry. This site is proposed for allocation in the MSP and this draft SA has been undertaken of an MSP updated to include the new site proposed for allocation on Land South and West of Hermitage Quarry.
- 5.3.4 In June 2023, a Regulation 18 consultation was undertaken on the proposed draft MSP amended to include the new site proposed for allocation. An SA Report was published alongside the draft MSP at the same time¹⁸ setting out the predicted

¹⁶ Sustainability Appraisal Report of the Kent Minerals and Waste Local Plan 2024-203 – Main Modifications Consultation, Amey, October 2024

¹⁷ Updates to the Kent Mineral Sites Plan: Sustainability Appraisal Scoping Report, Amey, August 2022

¹⁸ Draft Sustainability Appraisal Report – Regulation 18 Consultation, Amey, May 2023

impacts of the draft MSP as proposed, as well as assessing potential alternatives to it. Comments were received on the SA Report and these are set out in Appendix B.

5.3.5 In response to views received in the consultation, KCC undertook a second Call for Sites from August to October 2023 but this did not result in the nomination of any further sites.

5.3.6 Following this second Call for Sites, the update to the MSP was paused pending further detailed technical work on the new site proposed for allocation. This work has now been completed and KCC are now undertaking a Regulation 19 consultation on the draft updated MSP. This report presents the process, findings and recommendations arising from the SA of the MSP updated to include the new site proposed for allocation to accompany the Regulation 19 public consultation on these updates. This builds on the earlier 2023 SA Report and takes account of the additional information available through the detailed technical work.

5.4 Difficulties Encountered

5.4.1 A number of difficulties were encountered in undertaking the appraisal:

- i) **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 updated 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 certainty. The SA has relied on technical assessments produced by other organisations, by the promoter of a site or their agents/consultants, detailed technical assessment technical work commissioned by KCC, information provided by consultees in previous applications for development at Hermitage Quarry, and information provided in the Inspector's Report¹⁹ on the inquiry into the application for the Westerly Extension to Hermitage Quarry which was subsequently approved by the Secretary of State in 2013.
- ii) **Uncertainty.** 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, what measures are proposed for mitigating those

¹⁹ Report to the Secretary of State for Communities and Local Government, The Planning Inspectorate, March 2013

impacts and whether impacts can be successfully mitigated. For a site to be allocated in the MSP it must be capable of being compliant with the policies in the KMWLP based on reasonable assumptions, but it has not been assumed that this will be sufficient to guarantee no adverse impacts. The SA makes recommendations for mitigation of such impacts, including where this should be addressed within planning applications when sufficient technical detail will need to be made available.

6.0 HOW HAS THE APPRAISAL AT THIS CURRENT STAGE BEEN UNDERTAKEN (SUSTAINABILITY APPRAISAL METHODOLOGY)?

6.1 SA Framework and Sustainability Objectives

6.1.1 Following due diligence in terms of the context and baseline conditions, the framework and sustainability objectives for this draft SA of an MSP updated to include the new site proposed for allocation on Land South and West of Hermitage Quarry have been developed from the frameworks used for earlier SAs of the KMWLP and MSP, most recently the SA of the Regulation 18 draft of the MSP in 2023. The framework was published for consultation in the SA Scoping Report and is shown in **Table 6.1** below. This incorporates several additions to the SA Framework, shown in italics in **Table 6.1**, which were added as a result of the refresh of the policy review and baseline data following the MSP Regulation 18 consultation.

Table 6.1 – SA Framework

Sustainability Objectives	Detailed Considerations
1. Biodiversity	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 i) Add to the biodiversity baseline by creating opportunities for targeted habitat creation (which, ideally, contributes to local or landscape scale habitat networks). ii) Avoid hindering plans for biodiversity conservation or enhancement iii) Support increased access to biodiversity iv) Provide a net gain in biodiversity value v) <i>Compensate for the loss of irreplaceable habitat</i>
2. Climate change	Address the causes of climate change through reducing emissions of greenhouse gases through energy efficiency and energy generated from renewable sources i) Promote sustainable design and construction of facilities and support wider efforts to reduce the carbon footprint of minerals and waste operations. ii) Promote climate change adaptation
3. Community and well-being	Support efforts to create and sustain sustainable communities, 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 Multiple Deprivation. ii) Help to tackle more hidden forms of deprivation and exclusion, such as that which is experienced in urban and coastal areas and particular socio-economic groups within communities. iii) Ensure that the necessary aggregates are available for building, and that the necessary waste infrastructure is in place to support housing and economic growth iv) Ensure that minerals and waste development does not contribute to poor air quality with particular reference to PM2.5 and Nox v) Protect and enhance public rights of way and access vi) Protect local green space

	vii) Avoid loss of tranquillity
4. Sustainable economic growth	Support economic growth and diversification i) Support the development of a dynamic, diverse and knowledge-based economy that excels in innovation with higher value, lower impact activities ii) Stimulate economic revival and targeted employment generation in deprived areas
5. Flood risk	Reduce the risk of flooding and the resulting detriment to public wellbeing, the economy and the environment i) Ensure that development does not lead to increased flood risk on or off site ii) Seek to mitigate or reduce flood risk through developments that are able to slow water flow and promote groundwater recharge
6. Land	Make efficient use of land and avoid sensitive locations i) Make best use of previously developed land ii) Avoid locations with sensitive geomorphology iii) Seek to safeguard the best and most versatile agricultural land and recognise its economic and other benefits iv) Prevent inappropriate development in the Green Belt v) <i>Restore land quality</i>
7. Landscape and the historic environment	Protect and enhance Kent's countryside and historic environment i) Protect <i>and enhance</i> the integrity of National Landscapes and their setting and other particularly valued or sensitive landscapes ii) Take account of the constraints, opportunities and priorities demonstrated through landscape characterisation assessments and other studies at the landscape scale. iii) Avoid light pollution iv) Protect important heritage assets and their settings, as well as take account of the value of the character of the wider historic environment
8. Transport	Reduce and minimise unsustainable transport patterns and facilitate the transport of minerals and waste by the most sustainable modes possible i) Minimise minerals and waste transport movements and journey lengths; and encourage transport by rail and water. ii) Ensure that minerals and waste transport does not impact on sensitive locations, including locations already experiencing congestion and locations where planned growth or regeneration is reliant on good transport networks.
9. Water	Maintain and improve the water quality of the Kent's rivers, ground waters and coasts, and achieve sustainable water resources management i) Ensure that minerals and waste development seeks to promote the conservation of water resources wherever possible with particular reference to abstraction. ii) Avoid pollution of ground or surface waters, particularly in areas identified as being at risk or sensitive iii) <i>Promote sustainable drainage management</i>
10. Waste	Ensure the sustainable management of waste i) Manage waste in accordance with the waste hierarchy ii) Prevent adverse effects from waste on human health and the environment iii) Ensure waste is managed as near as possible to its place of production

6.2 Applying the Framework

How the Appraisal Has Been Carried Out

6.2.1 The SA is required to undertake an appraisal of an MSP updated to include the new site proposed for allocation on Land South and West of Hermitage Quarry. The new

proposed site has been subject to assessment using the SA framework set out in **Section 6.1** (see **Table 6.1**). An assessment matrix has been drafted and is presented in **Appendix C** and the results are summarised in **Section 7.1**.

- 6.2.2 The SA must also appraise the existing allocated sites as these would also be included in an update to the MSP. These sites were appraised in the SA of the currently adopted MSP during its development, the results of which were set out in the SA Report accompanying that Plan, published in November 2020. This appraisal work has been reviewed and updated where appropriate, including to incorporate the more recent additions to the appraisal framework highlighted in **Table 6.1**.
- 6.2.3 The appraisal of sites has considered a range of different types of effects as required by Annex I of the SEA Directive. The type of effects identified are indicated in the tables in **Appendix C**. Factors taken into consideration were:
- i) the expected scale of the effects or the degree to which the effects are likely to contribute to the achievement of the SA objective in the county overall;
 - ii) the certainty or probability that the effect is likely to occur as a consequence of the development of the site;
 - iii) whether the effects would be permanent or reversible;
 - iv) whether the effect will occur as a direct result of the MSP or not, in other words whether the MSP is key for achieving or controlling effects;
 - v) whether the effect is more strongly dependent on other interventions or other factors; and
 - vi) how important the objective is to the scope of the MSP.
- 6.2.4 The SA identifies whether effects are positive, negative, nil or uncertain. The following symbols are used in this report to indicate the impact or impacts and their relative significance. Where more than one effect is predicted, multiple symbols are given separated by '/'. 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.

Table 6.2 – Effects Symbols

Type of Effect	Symbol
Significant positive effect	++
Some positive effect	+
No effect	0
Some adverse effect	-
Significant adverse effect	- -
Uncertain effect	?

- 6.2.5 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 an updated MSP, the medium term is considered to be the remainder of the Plan period for an updated MSP and the long term is after the end of the Plan period of an updated MSP.
- 6.2.6 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 (i.e. primary or secondary), and whether the effect is temporary or permanent indicated by whether or not the effect could be reversed.
- 6.2.7 Cumulative and synergistic effects are discussed in **Section 7.3**.
- 6.2.8 The appraisal has assessed the likely effects arising from adoption of an updated MSP 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 an MSP updated to include the new site proposed for allocation. These recommendations are made in the tables in **Appendix C** and **Table 7.2** of this report.
- 6.2.9 Any planning applications for the development of sites on land allocated in the MSP will be required to be determined in accordance with the KMWLP unless material considerations indicate otherwise. These include development management policies in the KMWLP to manage and mitigate the impacts of development. For the allocated sites, development management criteria have been imposed in the adopted MSP to mitigate or avoid adverse impacts of development in these locations. In undertaking the appraisal, it has been assumed that any mitigation that has already been required by these criteria will be implemented to address the potential impacts of development. For the new site proposed for allocation at Hermitage Quarry, it is assumed that any mitigation already proposed by the site proposer will

be implemented. In addition, the draft updated MSP includes some proposed development management criteria for Land South and West of Hermitage Quarry and it is assumed that the requirements of these will be implemented. It is further assumed that if no mitigation is required for the allocated sites or has been proposed for the new proposed site, 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 additional 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.

SA of Alternatives to an MSP Updated to Include the New Site Proposed for Allocation on Land South and West of Hermitage Quarry

- 6.2.10 The SA is required to appraise reasonable alternatives to an MSP updated to include the new site proposed for allocation on Land South and West of Hermitage Quarry, including the possibility of a 'do nothing' option. No other site for the extraction of hard rock has been identified or was nominated during the two Calls for Sites undertaken in 2022 and 2023. Although an assessment of alternative sites within Kent has been undertaken, no suitable site has been identified.
- 6.2.11 An alternative could be not to allocate a site but instead rely on imports of hard rock from outside of the county. This has therefore been appraised against the SA framework, as an alternative to allocating the site on Land South and West of Hermitage Quarry. The detailed results are set out in **Appendix D** and summarised in **Section 7.2**.

7.0 SUSTAINABILITY APPRAISAL FINDINGS AND RECOMMENDATIONS

7.1 SA of an MSP Updated to Include the New Proposed Site

7.1.1 The SA has appraised the new site proposed for allocation on Land South and West of Hermitage Quarry for the likely impacts on sustainable development policy objectives. It has also reviewed and updated the appraisal of existing allocated sites in the adopted MSP. The methodology and assumptions used in undertaking the appraisal are set out in **Section 6**.

7.1.2 The appraisal has assessed the likely effects arising from development at each of the sites. The detailed findings of the SA of sites are set out in **Appendix C**. 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 this SA of draft updates to the MSP, including the proposed allocation of an extension to the existing site at Hermitage Quarry and the existing three allocated sites, are set out in **Table 7.1**. Discussions of the findings of the SA of draft updates to the MSP follow **Table 7.1**, along with recommendations for mitigation of effects. Further detail on mitigation is provided in **Appendix C**.

Table 7.2 – Summary of Findings of SA of Draft MSP Overall

Site	Sustainability Objective									
	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	10. Waste
Land to the south and west of Hermitage Quarry (new site proposed for allocation)	- -/+	0	0/-	++/-	0	-/0	-/0/+	0	0	+
M3 Chapel Farm	+	-	0	++/-	0	-	0/-	0	0	0
M10 Moat Farm	0	0	0/-	++/-	0	0	-/0	0	0	0
M13 Stonecastle Farm Quarry	-	0	0	++/-	0	-/?	?/0	0	0	0
Overall impacts	- -/+	-/0	0/-	++/-	0	-/0/?	-/0/?/+	0	0	+

Impacts of New site proposed for Allocation on Land South and West of Hermitage Quarry

- 7.1.3 Allocation of the new site proposed for allocation on land S & W of Hermitage Quarry would ensure the continued local supply of hard rock as a material to support economic growth, in particular via its use as a construction aggregate. It would provide support for local jobs within the mineral industry and help to avoid increased transport impacts and costs for hard rock. It would ensure the continued availability of Kentish ragstone for use in building restoration projects, which has qualities difficult to find in stone from elsewhere.
- 7.1.4 There are residential areas in proximity to the site proposed for allocation to the south and west of Hermitage Quarry, and there is the potential for impacts on these nearby dwellings from dust, noise, blasting, visual intrusion, light and loss of open space. Proposed development criteria require appropriate mitigation of impacts in accordance with KMWLP Policy DM 11 Health and Amenity.
- 7.1.5 The southern part of the site is designated as Plantation on Ancient Woodland Sites, which would be lost to development and is irreplaceable habitat. The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024 require an appropriate compensation plan and proposed development management criteria include this requirement. The biodiversity value of such ancient woodland sites principally resides in the soil²⁰ and agricultural land in the northern part of the site is grade 2 (very good). The soil from this area would be required to be stripped, stockpiled and used for restoration. Any planning application is required to be accompanied by a Soil Resource Plan as per government guidance²¹.
- 7.1.6 There are multiple patches of deciduous woodland priority habitat within the southern part of the site and the wooded part of the site forms part of Oaken Wood Local Wildlife Site (LWS), which would be lost to development, also potentially fragmenting remaining parts of the woodland. Plans are to restore the site to native deciduous woodland to provide a net gain in biodiversity value. Conditions should be imposed on development so that worked areas are restored soon after completion and without avoidable delay. Sufficient mitigation should be provided to avoid adverse impacts

²⁰ Inspector's report on Westerly Extension, para 7.37

²¹ Construction Code of Practice for the Sustainable Use of Soils on Construction Sites, Defra, September 2009

- (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. In accordance with policy DM3 of the KMWLP, a net gain in biodiversity will be required.
- 7.1.7 Public Right of Way path MR108 crosses the site, running for about 2km across the site. In addition, there are several informal tracks through Oaken Wood which may be used, with the permission of the landowner, for recreation by walkers and riders. The PROW would be subject to diversion which, in accordance with KMWLP policy DM 11 Health and Amenity, must preserve the connectivity of public rights of way and made safe for all users. In addition, the draft Landscape Strategy²² proposes the creation of additional paths and therefore there are likely to be long-term benefits.
- 7.1.8 An area Tree Preservation Order covers land to the north of the proposed site, the majority of which has already been lost to extraction. A strip of land along the southern and western borders of the TPO with remaining trees is covered by the proposed working area, therefore trees covered by the TPO would be lost. This would be an adverse impact in the short to medium term, but restoration to native woodland would reverse this loss in the long term
- 7.1.9 The site is 3.9km from the Kent Downs National Landscape. The Landscape Assessment²³ has concluded that there will be no significant impacts on receptors within the National Landscape or on the designation as a whole. The site is required to be worked sequentially with the existing operations, therefore impacts are unlikely to be significantly greater than current impacts, and in the long term will be nil. Conditions should include a requirement to restore worked areas soon after completion and without avoidable delay.
- 7.1.10 The Landscape Assessment concludes that it would be difficult to avoid significant impacts on KCC Character Area Mereworth Woodlands, but a well-considered restoration scheme could theoretically replace the lost woodland over a period of years post-extraction, restoring the character of the area to some degree. From a visual perspective, adverse impacts would largely be confined to receptors in close proximity to the site boundary. Proposed development management criteria require

²² Land South and West of Hermitage Quarry: Proposed Landscape Strategy 2024 Draft, Hill-Wood and Co (Kent) Ltd, 2024

²³ Landscape and Visual Technical Note, WSP, February 2026

minimisation of landscape impacts, including maintenance of buffers, advance planting, bunding and phasing.

- 7.1.11 The Maidstone Landscape Character Assessment²⁴ identifies Oaken Wood as a particular landscape type providing a strong sense of place and local distinctiveness. Landscape impacts from extraction could be screened but will not be a minor change and will not preserve the continuity of the coppice, therefore locally-significant adverse impacts are likely on this character area.
- 7.1.12 The 2022 planning permission²⁵ relating to vehicle movements at the existing operations states that there should be a daily maximum combined total of 800 HGV movements a day within a single calendar month, and no higher than 900 on any one day. Proposed development management criteria require HGV levels not to exceed those at the existing site unless it is demonstrated that this will not give rise to unacceptable adverse impacts, therefore impacts on the nearby AQMAs, the local road network and on greenhouse gas emissions are unlikely to increase.
- 7.1.13 There are listed buildings in proximity to the site, the closest approximately 350m from the site and numerous others within 1km. It is possible that extraction at the site could have adverse impacts on one or more of these listed buildings, although the separation distances would suggest that any impacts would be minor and proposed development management criteria require mitigation of adverse impacts. In accordance with KMWLP DM 5 Heritage Assets, any planning application will be required to demonstrate that the impacts on heritage assets in the vicinity of the new site proposed for allocation can be appropriately mitigated.
- 7.1.14 Although there are no designated heritage assets within the new site proposed for allocation, there is potential for archaeology to be present. Proposed development management criteria require assessment of geo-archaeological and palaeolithic remains and features and the historic environment should be part of any EIA. In accordance with KMWLP DM 6 Historic Environment Assessment, any planning application is required to be accompanied by an assessment of the archaeological

²⁴ Maidstone Landscape Character Assessment, Maidstone Borough Council and Jacobs, March 2012 amended July 2013

²⁵ Ref. TM/21/42 Decision Notice, <https://www.kentplanningapplications.co.uk/Planning/Display/KCC/TM/0289/2020>

value of the site and a proposed plan for preserving remains in situ where possible or removing and conserving remains offsite.

- 7.1.15 The site is underlain by principal and secondary bedrock and superficial aquifers. It is classed as having medium and medium-high groundwater vulnerability in the north of the site and high groundwater vulnerability in the south and east of the site and lies within a Source Protection Zone 3. There is the potential for impacts on water, although if conditions are imposed similar to the existing operations on the depth of working in relation to the water table, adverse impacts are unlikely. Proposed development management criteria require demonstration that development would not give rise to unacceptable adverse impacts on the water environment. In accordance with KMWLP Policy DM 10 Water Environment, developments must not result in the deterioration of physical state, water quality or ecological status of any water resource and waterbody.

Impacts of an MSP Updated to Include the New site Proposed for Allocation on Land South and West of Hermitage Quarry

- 7.1.16 Each of the sites contain or are adjacent to some form of biodiversity asset or biodiversity value and impacts are possible in each case. Planning applications are required to fully assess the impacts on biodiversity, to provide mitigation to ensure no unacceptable adverse impacts and to provide a net gain in biodiversity. Restoration proposals at three of the sites aim to restore the site to biodiversity habitat which will help to mitigate any potential loss.
- 7.1.17 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.
- 7.1.18 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 of a Public Right of Way and loss of tranquillity. However, development management criteria require mitigation to adequately minimise impacts from dust, noise, vibration, light and visual impacts and for the Public Right of Way to remain open as long as possible and maintain connectivity with the surrounding network and therefore cumulative impacts are not likely to be significant.

- 7.1.19 The Mineral 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 and by supporting the retention of jobs in the mineral industry within Kent. By facilitating the extraction of primary aggregates, the Minerals Sites Plan is exploiting a non-renewable resource.
- 7.1.20 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.
- 7.1.21 Two of the mineral sites contain soil which is classed as the best and most versatile agricultural land, although restoration to agricultural land is proposed for one of these and therefore the impact on soil quality is not likely to be significant for this site. Two of the sites lie within the Metropolitan Green Belt, in which case it must be demonstrated that operations will not constitute inappropriate development and very special circumstances must exist. Given that the affected sites will be restored to wetland habitat, lasting cumulative impacts on the Green Belt are not envisaged.
- 7.1.22 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 in most instances. However, the site at Hermitage Quarry will have impacts on local landscape character that are unlikely to be mitigated, although the quarry is not expected to have any significant impacts on the National Landscape.
- 7.1.23 Minerals sites generate vehicle movements accessing and leaving the sites. The majority of these are HGV movements and additionally staff vehicles will access the sites. For sites M10 and M13 and the new site proposed for allocation, 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 an MSP updated to include the new proposed site overall is not expected to be great given the predicted number of movements and the context of all traffic movements in the county. Because of the location of the existing sites allocated, and the new site proposed for allocation, it is unlikely that a Minerals Sites Plan that included these sites would 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.

7.1.24 Each of the currently allocated mineral sites have the potential for significant impacts on hydrology/hydrogeology and water quality. The new site proposed for allocation at Hermitage Quarry is unlikely to affect hydrology/hydrogeology or quality. Development management criteria for the allocated sites require assessment and mitigation of impacts on hydrology/hydrogeology and the cumulative impacts from all allocated sites and new site proposed for allocation in the Mineral Sites Plan are not expected to be significant for the county as a whole.

7.2 Recommendations for Mitigation of Impacts

7.2.1 The SA has considered whether there is scope for making recommendations for measures to prevent, reduce and as fully as possible, or offset any significant adverse effects of the updated MSP. These are set out in full in the appraisal tables in **Appendix C** and summarised in **Table 7.2** below. Identified mitigation recommendations relate only to the new site proposed for allocation on Land South and West of Hermitage Quarry.

Table 7.2 – Recommendations for Mitigation of Effects of New Proposed Site

Sustainability Objective	Mitigation Recommendation
Biodiversity	Planning conditions should include a requirement to restore worked areas soon after completion and without avoidable delay.
Community and well-being	Restoration of the site after working should include reinstatement of public rights of way where appropriate and feasible.
Landscape and the historic environment	Planning conditions should include a requirement to restore worked areas soon after completion and without avoidable delay.

7.3 SA of the Alternative to Site Allocation

7.3.1 The alternative to allocation of Land South and West of Hermitage Quarry would be to rely on imports of hard rock from outside Kent.

7.3.2 A report by WSP²⁶ looking into alternative sources of hard rock outside Kent notes that large quantity of crushed rock is extracted to produce small quantities of building stone. It reports that, currently, Hermitage Quarry produces about 900,000 tonnes of stone per annum, but that the Inspector's Report for the westerly extension

²⁶ Kent Minerals and Waste Local Plan Review 2024-2039: Alternative Ragstone Supplies, WSP, June 2026

indicated only about 20,000 tonnes per annum (about 2% of production) was sold as building stone.

- 7.3.3 Information from Gallagher Aggregates Limited indicates that most of the hard rock they produce is destined for use in markets in Kent, particularly for crushed rock, while dimension stone is used for building and restoration work within Kent and some restoration work on buildings in London.
- 7.3.4 The WSP report on alternative supplies states that, in respect of ragstone as a building stone, the ragstone-bearing Hythe beds extend all through Kent, but at present only Hermitage quarry is operational. In respect of ragstone as a construction aggregate, whilst Kent produces significant quantities of crushed rock for aggregate purposes, production from Hermitage Quarry accounts for between a quarter and a third of the county's total requirements each year (dependent upon fluctuations in demand). Remaining needs are either derived from Kent's other crushed rock quarry (Blaise Farm Quarry) or imported from other places across the UK (and beyond).
- 7.3.5 Although no information is available to indicate where future supplies might come from, the WSP report states that in 2023 Kent was a significant importer of crushed rock through railheads and ports. It concludes that the majority of supplies currently come from the Southwest, the East Midlands, Scotland and Ireland. For the purpose of assessing a reasonable alternative, it is assumed that this could continue in the future with increased supplies of crushed rock from one or more of these locations, although it may not be the case.
- 7.3.6 The alternative to allocation of the Hermitage Quarry extension by relying on imports from outside Kent has 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 D** and summarised below.

Table 7.3 – Summary of Appraisal of Alternative

Site	Sustainability Objective									
	11. Biodiversity	12. Climate change	13. Community and well-being	14. Sustainable economic growth	15. Flood risk	16. Land	17. Landscape and the historic environment	18. Transport	19. Water	20. Waste
Impacts of importing into Kent	?	-	?	-	?	?	-/?	-	?	0

Discussion

- 7.3.7 As an alternative to sourcing hard rock from within Kent, clearly importation of hard rock to meet local needs in Kent and Medway the wider South East of England will increase the need for the transport of mineral and associated emissions to air (including greenhouse gas emissions). Minerals may be transported by rail, sea or road, the likelihood of which will vary with the source of the mineral. An assessment of the carbon impacts by WSP²⁷ looked at several scenarios for supply from locations outside Kent (Somerset, Norway, Scotland, East Midlands, Northern Ireland) and assessed the carbon impacts of import into Kent from each location, the primary mode of transport for each being either rail or sea. This found that there is a significant carbon impact from importing crushed hard rock into Kent. Transport emissions were highest for scenario 2 (Norway) (636,037 tonnes of carbon dioxide equivalent (tCO₂e) over 15 years, or 42,402 tCO₂e per annum) and lowest for scenario 1 (Somerset) (198,804 tCO₂e over 15 years, or 13,254 tCO₂e per annum). The results showed that whilst the mode of transport has a significant impact on the emissions, since the transport distances were drastically smaller in rail freight transport, it became a key factor in the determination of transport emissions. The actual effect on emissions is not known with certainty as the quantities of mineral likely to be sourced from different locations is unknown. For comparison purposes, UK government data²⁸ shows that the total emissions for transport in Kent in 2023

²⁷ Carbon Assessment for Potential Extension of Hermitage Quarry, WSP, March 2026

²⁸ <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-greenhouse-gas-emissions-statistics-2005-to-2023>

were approximately 2,989,100 tCO₂e, so the scenarios would be equivalent to between 0.44% and 1.42% of Kent's total annual transport emissions.

- 7.3.8 The WSP assessment investigated transport distances associated with a number of potential scenarios for sourcing mineral outside Kent. The transport distances involved in each scenario varied between 284km (Somerset) and 1528km (Scotland). There is a greater likelihood of negative impacts on air quality from increased transport and negative impacts may be caused on road and rail networks, noise and disturbance, depending on route and distance. The overall balance of impacts is uncertain, as the likely quantities from any particular source is also unknown, but the balance is likely to be negative.
- 7.3.9 Importation of hard rock from elsewhere in the UK is likely to have adverse economic impacts from increased transport costs affecting the cost of the mineral. Around 140 direct jobs would be lost in Kent with the closure of Hermitage Quarry, with loss of indirect support for a further 400 jobs, although jobs would be supported at quarries outside of Kent.
- 7.3.10 Kentish ragstone is used in heritage restoration projects, with qualities difficult to find in imported stone, therefore adverse impacts on the built historic environment are likely.
- 7.3.11 Importation from elsewhere in the UK may have adverse impacts on communities and their wellbeing in proximity to the sites where extraction takes place, from impacts on amenity and potentially also from impacts on air quality, but this is dependent on where the mineral comes from and the conditions at those sites. The control of impacts at those sites is a matter for the relevant Mineral Planning Authorities.
- 7.3.12 Similarly, importation of hard rock from elsewhere in the UK may have impacts on biodiversity and geodiversity, flood risk, land and soil quality, landscape, historic assets and water quality, but all of these impacts are dependent on where the mineral comes from and the conditions at those sites. The control of impacts at those sites is a matter for the relevant Mineral Planning Authorities.
- 7.3.13 It is not considered that there is any reasonable alternative to the existing, already allocated sites. A review of the adopted MSP was undertaken in 2025 and this concluded that all three site allocations continue to be appropriate and no new

evidence was found that would justify de-allocating any site. The three sites were found to remain aligned with the objectives and requirements set in 2020, with no significant constraints identified beyond those already addressed in the Plan.

7.4 Cumulative Effects and Inter-Relationship Between Effects

7.4.1 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.

7.4.2 A number of different types of impact are set out in European Commission guidance:

- i) separate developments causing the same impact – cumulative;
- ii) different impacts acting together on a receptor e.g. air pollution and land take – cumulative;
- iii) plan impacts which give rise to other indirect impacts – secondary; and
- iv) different impacts which together give rise to yet another impact – cumulative and secondary.

7.4.3 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 **Appendix C** and **Appendix D** 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 **Appendix C** and **Appendix D**. Cumulative impacts are discussed in this section of the SA Report.

7.4.4 There are two types of situation that could give rise to cumulative impacts:

- i) the same effect arising from two or more different sources; and
- ii) different effects where there is a relationship between the effects and potentially an interaction.

7.4.5 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:

- i) the potential for different developments to give rise to the same type of effect; and
- ii) the potential for interaction between different types of effect.

7.4.6 In order to assess the cumulative impacts arising from an updated MSP that included the existing allocated sites and the new site proposed for allocation, the appraisal considered the overall effect of these sites as a whole on each of the SA objectives. The results of this are summarised in **Table 7.1** and discussed in **Section 7.1**.

Cumulative Impacts in Combination with Other Plans and Strategies

7.4.7 The appraisal has considered the potential for effects arising from other plans and strategies which, in combination with effects arising from an updated MSP that included the existing allocated sites and the new site proposed for allocation on Land South and West of Hermitage Quarry, 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.

7.4.8 The following key plans/programmes have been identified that could give rise to significant cumulative impacts together with the updated MSP:

- i) Kent Minerals and Waste Local Plan 2024-39, Kent County Council, March 2025
- ii) Local Transport Plan 5: Striking the Balance, Kent County Council, December 2024
- iii) Local Plan Review 2021-2038, Maidstone Borough Council, March 2024
- iv) Lenham Neighbourhood Plan 2017-31, Lenham Parish Council, July 2021
- v) Adopted Local Plan, Ashford Borough Council, February 2019
- vi) Core Strategy, Tonbridge and Malling Borough Council, September 2007
- vii) Local Plan, Tunbridge Wells Borough Council, December 2025
- viii) The London Plan 2021, London Assembly, March 2021.

7.4.9 The relevant sections of each of these with the potential to give rise to cumulative effects is summarised in **Appendix E**, 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.

- 7.4.10 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 with related impacts on air quality, noise, congestion and reduced amenity for communities near the road network. 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.
- 7.4.11 There is synergy between an MSP that included the existing allocated sites and the new site proposed for allocation 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 an MSP that included the existing allocated sites and the new proposed site as this would help ensure that there are sufficient locally available reserves of the minerals required by the construction sector and for other economic uses.
- 7.4.12 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.
- 7.4.13 The Maidstone Plan contains housing allocations for 187 dwellings at Oakapple Lane, Barming at 500m from the site, and 500 dwellings at East of Hermitage Lane, Maidstone at 1.3km. These developments will increase demand for road space on Hermitage Lane although the impact of any proposed housing development on the local road network is not known. Traffic movements associated with an extension to Hermitage Quarry will not increase.
- 7.4.14 Proposed measures in the Local Transport Plan are likely to increase capacity on the A228 and A229 to improve journey times which could benefit transport of minerals at three of the sites. The Plan also includes commitments to measures to promote alternatives to road haulage. Together these measures are likely to reduce

the potential for cumulative impacts on the road network and potentially alleviate air quality impacts on the AQMA. However, the balance of effects in combination with the transport impacts of an updated MSP that included the existing allocated sites and the new proposed site is not known.

- 7.4.15 KCC maintains a list²⁹ of existing operational and inactive waste and minerals sites. Some of these could contribute to cumulative effects in combination with the new site proposed for allocation on Land South and West of Hermitage Quarry and existing allocated sites in the MSP. 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. There could be related cumulative impacts on biodiversity in the locality from reduced air quality and disturbance. However, there is no evidence to suggest that the activities at these sites would have any significantly different impact from other commercial and industrial operations in the vicinity of the new proposed site and allocated sites. In any event, none of the existing waste and mineral sites will generate significant vehicle movements on the local road network and therefore significant cumulative impacts are not expected in combination with the new site proposed for allocation and existing allocated sites in the MSP.

Interrelationship Between Effects

- 7.4.16 The SEA Directive requires the appraisal to consider the interrelationship between the significant effects of an MSP updated to include the new site proposed for allocation. This has been done as an integral part of the appraisal of the policies and options, and examples of this can be found throughout **Section 7, Appendix C** and **Appendix D** of this report. The main interrelationships found through the appraisal are highlighted below.
- 7.4.17 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

²⁹ <https://www.kent.gov.uk/about-the-council/strategies-and-policies/environment-waste-and-planning-policies/planning-policies/minerals-and-waste-planning-policy/monitoring-and-assessment>

the sum of individual impacts. These impacts also have the potential to negatively affect human amenity, along with visual impacts.

- 7.4.18 Restoration of mineral sites 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.
- 7.4.19 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.
- 7.4.20 Management of flood risk and avoiding increases can have economic benefits by protecting homes and businesses from having to deal with the financial consequences of flooding.
- 7.4.21 The promotion of sustainable economic growth through provision of minerals 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.

8.0 HOW MIGHT WE MONITOR THE PLAN'S IMPACTS?

8.1 Recommendations

- 8.1.1 As required by the SEA Directive, a number of recommendations are made for indicators to monitor the likely significant impacts of an MSP updated to include the new site proposed for allocation on Land South and West of Hermitage Quarry. These are set out in **Table 8.1** corresponding to the relevant impacts identified and summarised in the preceding chapters of this report.
- 8.1.2 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 8.1** for monitoring potential sustainability impacts that are not expected to occur as foreseen by the appraisal.
- 8.1.3 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.

Table 8.1 – Monitoring Recommendations

Sustainability 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 land of biodiversity value created through restoration. % net gain in biodiversity value achieved through minerals and waste development
2. Climate change	No practical indicators identified
3. Community and well-being	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. Hectares of accessible open space created by mineral site restoration.
4. Sustainable economic growth	Sales (tonnage) of minerals 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 Hectares of good quality agricultural land created by restoration Hectares of Green Belt lost to development

	Area of land of geodiversity value lost to minerals development, by significance
7. Landscape and the historic environment	Hectares of land of landscape value taken for minerals development Number of heritage assets lost to development, by type
8. Transport	Tonnage of minerals transported by road Tonnage of minerals transported by rail Tonnage of minerals transported by sea 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
10. Waste	No practical indicators identified

Appendix A – Review of Recent Policy Developments

The Biodiversity Gain Requirements (Irreplaceable Habitats) Regulations 2024

The Regulations define what amounts to 'irreplaceable habitat' for the purposes of Part 2 of Schedule 7A to the Town and Country Planning Act 1990, including Plantations on Ancient Woodland Sites. Any development with irreplaceable habitat onsite and for which planning permission is granted requires an appropriate compensation plan to be in place which does not include the use of biodiversity credits.

Implications for SA framework

Include an objective requiring compensation for the loss of irreplaceable habitat

Kent and Medway Economic Framework, Kent and Medway Economic Partnership, March 2024

Three objectives are for Kent and Medway's economy to be more:

- i) Productive;
- ii) Sustainable; and
- iii) Inclusive

To help deliver these three objectives, there are some key themes to focus action over the next few years. There are five ambitions which seek to:

- i) Enable innovative, productive and creative businesses;
- ii) Widen opportunities and unlock talent;
- iii) Secure resilient infrastructure for planned, sustainable growth;
- iv) Place economic opportunity at the centre of community wellbeing and prosperity;
- v) Create diverse, distinctive and vibrant places.

Implications for SA framework

No change



Reforming Kent 2025-2028, Kent County Council, November 2025

The strategy sets out the vision for Kent from 2025 to 2028. The vision is that Kent is a place where the residents feel safer, healthier and wealthier and know that their political representatives try to get the best value for every pound spent. The commitments to the residents of Kent are that the Council will:

- i) Keep council tax increases as low as possible but will maintain the quality of service provision;
- ii) Ask the difficult questions and challenge long held assumptions within the county council.
- iii) Not accept the status quo where it fails Kent's residents whether as service users or taxpayers;
- iv) Have a ruthless focus on value for money, cost efficiency and common sense;
- v) Expect those who the Council support to respect the services and monies provided to them;
- vi) Reward those who work hard and achieve on merit rather than tick boxes.

The strategy outlines a number of objectives

- i) Support local businesses to attract investment and create job opportunities;
- ii) Protect the countryside and give strong support to Kent's farmers and rural pursuits and communities;
- iii) Use Kent's buying power to support local jobs and keep investment in the county;
- iv) Scrap unattainable Net Zero 2030 and focus environment policy on direct benefits to Kent residents, including rescinding the Climate Emergency Declaration, bringing forward a new Energy and Low Emissions Strategy, ensuring an effective waste management and recycling service and helping businesses and residents adapt to a changing climate;
- v) Tackle inequality blighting many coastal communities;
- vi) Improve the quality of roads and work to reduce delays from roadworks;
- vii) Ensure that the infrastructure needs of the county to support economic growth and quality of life are fully in place;
- viii) Protect the environment with practical, affordable and visible improvements.

Implications for SA framework

No change



A New Vision for Water, Defra, February 2026

This White Paper sets out the government's action plan for water. It is largely focused on reforming the water sector and the wider water system to make sure it delivers safe and secure supplies of water, a protected and enhanced environment, a fair deal for customers and investors in a way that is more efficient and integrated. However, it also includes an aim to do better at addressing the root causes of pollution head-on. It proposes a shift in focus towards 'pre-pipe' solutions, such as rainwater management, including sustainable drainage systems, and tackling sewer misuse.

Implications for SA framework

Include an objective on sustainable drainage management

Blueprint for Halting and Reversing Biodiversity Loss: the UK's Biodiversity Strategy and Action Plan for 2030, Defra, April 2025

The strategy details the UK's approach to implementing the Global Biodiversity Framework of the Convention on Biological Diversity with the following targets:

Target 1: The UK will ensure that all areas are under participatory, integrated and biodiversity inclusive spatial planning and/or effective management processes addressing land- and sea-use change, to bring the loss of areas of high biodiversity importance, including ecosystems of high ecological integrity, close to zero by 2030.

Target 2: The UK will ensure that by 2030 at least 30 per cent of areas of degraded terrestrial, inland water, and marine and coastal ecosystems are under effective restoration.

Target 3: The UK will ensure and enable that by 2030 at least 30 per cent of terrestrial and inland water areas, and of marine and coastal areas, especially areas of particular importance for biodiversity and ecosystem functions and services, are effectively conserved and managed.

Target 4: The UK will ensure urgent management actions to halt human induced extinction of known threatened species and for the recovery and conservation of species, in particular threatened species.

Target 5: The UK will ensure that the use, harvesting and trade of wild species is sustainable, safe and legal.



Target 6: The UK will eliminate, minimise, reduce and or mitigate the impacts of invasive alien species on biodiversity and ecosystem services.

Target 7: The UK will reduce pollution risks and the negative impact of pollution from all sources by 2030, to levels that are not harmful to biodiversity and ecosystem functions and services.

Target 8: The UK will minimise the impact of climate change and ocean acidification on biodiversity and increase its resilience through mitigation, adaptation and disaster risk reduction actions.

Target 9: The UK will ensure that the management and use of wild species are sustainable, thereby providing social, economic and environmental benefits for people, especially those in vulnerable situations and those most dependent on biodiversity.

Target 10: The UK will ensure that areas under agriculture, aquaculture, fisheries and forestry are managed sustainably, in particular through the sustainable use of biodiversity, including through a substantial increase of the application of biodiversity-friendly practices, such as sustainable intensification, agroecological and other innovative approaches, contributing to the resilience and long-term efficiency and productivity of these production systems, and to food security, conserving and restoring biodiversity and maintaining nature's contributions to people, including ecosystem functions and services.

Target 11: The UK will restore, maintain and enhance nature's contributions to people, including ecosystem functions and services, such as the regulation of air, water and climate, soil health, pollination and reduction of disease risk, as well as protection from natural hazards and disasters.

Target 12: The UK will significantly increase the area and quality, and connectivity of, access to, and benefits from green and blue spaces in urban and densely populated areas sustainably,

Target 13: The UK will take effective legal, policy, administrative and capacity-building measures at all levels, as appropriate, to ensure the fair and equitable sharing of benefits that arise from the utilisation of genetic resources.



Target 14: The UK will ensure the full integration of biodiversity and its multiple values into policies, regulations, planning and development processes, poverty eradication strategies, strategic environmental assessments, environmental impact assessments and, as appropriate, national accounting.

Target 15: The UK will take legal, administrative or policy measures to encourage and enable business, and in particular to ensure that large and transnational companies and financial institutions: (a) regularly monitor, assess and transparently disclose their risks, dependencies and impacts on biodiversity; (b) provide information needed to consumers to promote sustainable consumption patterns; (c) report on compliance with access and benefit-sharing regulations and measures, as applicable; in order to progressively reduce negative impacts on biodiversity, increase positive impacts, reduce biodiversity-related risks to business and financial institutions, and promote actions to ensure sustainable patterns of production.

Target 16: The UK will ensure that people are encouraged and enabled to make sustainable consumption choices, including by establishing supportive policy, legislative or regulatory frameworks, improving education and access to relevant and accurate information and alternatives, and by 2030, reduce the global footprint of consumption in an equitable manner, including through halving global food waste, significantly reducing overconsumption and substantially reducing waste generation.

Target 17: The UK will establish, strengthen capacity for, and implement biosafety measures.

Target 18: The UK will identify by 2025, and eliminate, phase out or reform by 2030, incentives, including subsidies, harmful for biodiversity.

Target 21: The UK will ensure that the best available data, information and knowledge are accessible to decision makers, practitioners and the public.

Target 22: The UK will ensure the full, equitable, inclusive, effective and gender-responsive representation and participation in decision making, and access to justice and information related to biodiversity by indigenous peoples and local communities.

Implications for SA framework

No change



10 Year Health Plan for England, Department of Health and Social Care, July 2025

The plan outlines 3 radical shifts: Hospital to Community; Analogue to Digital; and Sickness to Prevention. Sickness to Prevention supports addressing wider determinants of health in the built environment, including infrastructures enabling physical activity (sports facilities, greener safer healthier transport), good quality and warmer homes, and air pollution.

Implications for SA framework

No change

Decarbonising Transport: A Better, Greener Britain, Department for Transport

The plan sets out the Government's commitments and the actions needed to decarbonise the entire transport system in the UK. It commits the UK to phasing out the sale of new diesel and petrol heavy goods vehicles by 2040 and to deliver a net zero rail network by 2050, with sustained carbon reductions in rail along the way. The ambition is to remove all diesel-only trains (passenger and freight) from the network by 2040. There is a commitment to building extra capacity on the rail network to meet growing passenger and freight demand and support significant shifts from road and air to rail. It also seeks to encourage a transition to green shipping with a commitment to net zero for the maritime sector by 2050 at the latest.

Implications for SA framework

No change

The Green Infrastructure Framework, Natural England, 2023

The framework aims to support equitable access to greenspace across the country, with an overarching target for everyone being able to reach good quality greenspace in their local area.

The framework is supported by a number of detailed principles, including that green infrastructure should:

- i) Create and strengthen networks of habitats and reduce fragmentation;
- ii) maximise health and wellbeing outcomes particularly in deprived areas and for disadvantaged groups.



- iii) comprise a variety of types and sizes of green and blue spaces, green routes and environmental features as part of a network that can provide a range of different functions and benefits for people, nature and places and solutions to address specific issues and needs;
- iv) enhance ecological networks and support ecosystem services, connecting provision with those who need its benefits;
- v) create and maintain green liveable places that enable people to experience and connect with nature, that offer everyone, wherever they live, access to good quality parks, green spaces, recreational, walking and cycling routes that are inclusive, safe welcoming, well-managed and accessible for all;
- vi) respond to an area's character so that it contributes to the conservation, enhancement and/or restoration of landscapes, or in degraded areas create new high-quality landscapes to which local people feel connected;

Implications for SA framework

No change

2030 Strategic Framework for International Climate and Nature Action, UK Government, 2023

The framework identifies that land is a finite resource with many competing demands. It is critical to food security, for allowing healthy ecosystems to thrive and for economic development. There may be direct trade offs (e.g. irresponsible mining for critical minerals to support the energy transition can adversely affect biodiversity-rich habitats). The UK government is therefore promoting innovation, coordinated policy action and redirecting investment in agriculture and food systems and land use to identify, develop and scale approaches that can reduce emissions, restore biodiversity and increase productivity.

The UK will focus its international efforts on a number of areas in order to tackle the challenges of climate change and biodiversity in the next decade, including:

- i) accelerate global adoption of clean technologies and sustainable solutions;
- ii) ensure the transition to clean technology and sustainable solutions supports our nature objectives;
- iii) increase ambition, commitment and action to respond to climate and environmental impacts at global, national and local levels;



- iv) drive global ambition to protect and restore land and sea;
- v) support a global transition to address overexploitation and promote the sustainable management and use of natural resources;
- vi) harness the role of nature in tackling climate change and work with others to make nature more resilient to climate change.

Implications for SA

Include an objective to restore land quality.

Maritime Decarbonisation Strategy, Department for Transport, 2025

The strategy sets clear goals for reducing greenhouse gas emissions from the UK domestic maritime sector including seagoing vessels and inland waterways. The objective is to reduce the sector's fuel lifecycle emissions to zero by 2050, with interim goals for at least a 30% reduction by 2030 and at least an 80% reduction by 2040, compared to 2008 levels.

The government will introduce regulations to drive the uptake of zero and near-zero greenhouse gas emission fuels and energy sources and introduce emissions pricing through the UK Emissions Trading Scheme and incentivising energy efficiency from 2026.

Implications for SA framework

No change

Future of Freight: A Long-Term Plan, Department for Transport, June 2022

Government will work with industry to continue efforts to encourage a greater utilisation of freight across all modes, including modal shift from road to rail, inland waterways and coastal and short sea shipping. In December 2023, the government published a target of growing rail freight by at least 75% by 2050.

Implications for SA framework

No change



Levelling-up and Regeneration Act 2023

A local planning authority must have special regard to the desirability of preserving or enhancing a heritage asset or its setting when considering whether to grant planning permission or permission in principle for the development of land in England. Local planning authorities are under a statutory duty to have special regard to the preservation of Listed Buildings and Conservation Areas in the exercising of their planning functions. Section 58B extends this duty to Scheduled Monuments, Protected Wreck Sites, Registered Parks and Gardens, Registered Battlefields or World Heritage Sites.

Section 136(1) creates a duty to amend the Town and Country Planning (Consultation) (England) Direction 2021 within three months of Royal Assent. Its effect is to ensure that local planning authorities must consult the Secretary of State where they do not intend to refuse planning permission in relation to applications for development affecting ancient woodland. Section 136(2) defines "ancient woodland" as meaning an area in England which has been continuously wooded since at least the end of the year 1600 A.D.

Section 245 on protected landscapes inserts new wording in section 85 of the Countryside and Rights of Way Act 2000 so that certain relevant authorities 'must seek to further' the purpose of Areas of Outstanding Natural Beauty in England.

Section 15C requires a local plan to take account of any local nature recovery strategy that relates to any part of the area of the local planning authority preparing the plan.

Section 15CB requires a minerals and waste plan to be prepared so that minerals and waste development contributes to the mitigation of, and adaptation to climate change. It also requires a minerals and waste plan to take account of any local nature recovery strategy that relates to any part of the relevant area.

Implications for SA framework

Include an objective to enhance National Landscapes.



Appendix B – Consultation Responses

Table B.3 – Comments on SA Scoping Report

Consultee	Comment	Response
Tunbridge Wells Borough Council	TWBC has the following comments to make on the SA scoping report: 1. Section 3.2. Considering the context of the plan, the minerals and waste data from 2018 appears to be older than is perhaps necessary. Is there any more recent data to report? 2. Sections 3.10 and 3.13 – the hyperlinks are missing (as a side note, it is uncertain whether this format of presenting hyperlinks will pass accessibility checks) 3. Section 4.2 (National Policy) is missing reference to the Environment Act 2021 which has elements relevant to waste disposal. It is noted this is referenced in the KMWLP itself such as under Policy CSW4 4. Section 4.3 (Local Policy) – it is suggested that references should be made to the AONB Management Plan, South-East Water Resource Management Plan, and the Kent Biodiversity Strategy in this section 5. Sections 5.1 and 5.2 – it is suggested that reference should be made to climate change adaptation as well as mitigation	The most recent data available is for 2020 and this is included in this section of the Scoping Report. The hyperlinks appear to be working in the published report. Comment on accessibility is noted and will be addressed in future published reports. Section 4.2 includes a summary of the Environment Act 2021. The Kent Biodiversity Strategy is included in Appendix A. The other two strategy documents have been reviewed and taken into account in defining the policy context. Climate change adaptation has now been added to the Appraisal Framework.
Tunbridge Wells Borough Council	Section 3.3 – it is suggested that references should be made to the AONB Management Plan, South-East Water Resource Management Plan, and the Kent Biodiversity Strategy in this section.	The Kent Biodiversity Strategy is included in Appendix A. The other two strategy documents have been reviewed and taken into account in defining the policy context.
Environment Agency	Within Section 4 on Policy Context, the paragraph describing flood risk mitigation, we encourage the inclusion of 'nature based solutions' as well as 'green infrastructure' to cover a broad set of options and to help meet carbon-reduction targets as well as reduce flood risk.	Section 4 summarises policy documents, including in this case the NPPF, which does not make reference to nature-based solutions. Also note Planning Practice Guidance does not make reference to 'nature based solutions' in the context of flooding.
Tunbridge Wells Borough Council	TWBC is generally supportive of the information set out in both the Draft Site Identification and Selection Methodology and Sustainability Scoping Reports. However, for clarity, consider it would be beneficial to define and give examples of what is meant by 'hard or crushed rock' aggregates as this is not very clear in either the Site Selection Methodology nor the Kent	Definition of the term has been included in the SA Report.

	Mineral and Waste Local Plan itself (including the glossary).	

Table B.2 – Comments on 2023 SA Report

Consultee	Comment	Response
Natural England	If the Council is minded to proceed with allocating the site at Hermitage Quarry, we recommend that a detailed assessment of any direct and indirect impacts along with ways in which these will be avoided or fully mitigated should be provided as part of future iterations of the Plan and fully tested through the Sustainability Appraisal. [Comment made in relation to SSSI, ancient woodland, National Landscape] Based upon the information provided within the Regulation 18 consultation, Natural England is concerned that the nature and scale of the impacts and the ability to mitigate them within the draft Sustainability Appraisal may be underestimated. As ancient woodland is an irreplaceable habitat, it is not possible to mitigate the direct loss of this habitat. Given the significant direct and indirect impacts to the natural environment that the site proposed for allocation at Hermitage Quarry is likely to have, we recommend that the Council should undertake a comprehensive and independent consideration of whether there are alternative sites or sources of material which will avoid or result in lesser environmental effects. This assessment should include alternative sites, including those outside of the County boundary and alternative sources such as recycled material. This assessment should include landscape, nature and geological conservation and soil considerations in addition to the socio-economic impacts. Once this assessment has been undertaken, and if the Council considers there are exceptional circumstances that justify the allocation, and the site proceeds to allocation, the Sustainability Appraisal and proposed Development Management policies should be updated to reflect the results of the impact assessment and any mitigation and compensation measures proposed (whilst acknowledging that it is not possible to compensate for the loss of irreplaceable ancient woodland habitat).	The SA has assessed the impacts on the SSSI, ancient woodland and the National Landscape and made recommendations for mitigation of impacts. The SA has appraised an alternative of sourcing mineral from outside of Kent.

Appendix C – Detailed Findings and Recommendations of SA of Sites

Table C.4 – 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			
- some adverse effect	H high probability		
-- significant adverse effect			
? uncertain effect			
Where multiple symbols are shown separated by '/', this is to indicate that more than one type of effect is predicted.			

Table C.2 – Land to the South and West of Hermitage Quarry

Sustainability Objective	Comments						
1. Biodiversity	Short	Med	Long	Prob	Dir/Ind	Rev?	
	- -/+	- -/+	?/+	H	D	Y	
	A substantial part of the site (southern part) is designated as Plantation on Ancient Woodland Sites (PAWS), which is former ancient woodland which, in this case, has been replanted with sweet chestnut coppice. This part of the PAWS would be lost to development, a significant adverse impact. As an irreplaceable habitat, compensation measures are required by proposed development management criteria. The biodiversity value of such replanted ancient woodland principally resides in the ancient woodland soil³⁰ and therefore restoration plans should include translocation of the soil. Proposed development management criteria include effective soil translocation and therefore significant adverse impacts associated with loss of valuable soils should be avoided. Any planning application is required to be accompanied by a Soil Resource Plan³¹ as recommended by Defra and Natural England. There are multiple patches of deciduous woodland priority habitat within the southern part of the site, which would be lost to development. Proposed development management criteria require restoration of the site to native deciduous woodland and meadow, therefore short and medium term adverse effects will be rectified in the longer term. The Case for Continuation³² provided by Gallagher proposes the creation of new species-rich native woodland. Planning conditions should include a requirement to restore worked areas soon after completion and without avoidable delay. Oaken Wood SSSI lies about 100m from the extraction area in the southwestern corner of the site. The citation states that "Oaken Wood is a key geomorphological site. It provides the best example in Britain of ridge and trough topography produced by intense cambering and gulling during the Pleistocene (tilting and cracking of surface rock outcrops by periglacial						

³⁰ Inspector's report on Westerly Extension, para 7.37

³¹ <https://www.gov.uk/guidance/natural-environment#agricultural-land-soil-and-brownfield-land-of-environmental-value>

³² Land to South and West of Hermitage Quarry: Suitability of Nominated Site for Allocation in Kent Mineral Sites Plan, Gallagher Aggregates Ltd, April 2026



	processes or deformation of underlying weaker strata). The ridge crests rise up to 8 m above the level of the trough floors, which extend for about 0.5 km in an east- west direction. This unusual type of topography is confined to the Maidstone area and the north Cotswolds and is most spectacularly developed at Oaken Wood.” The SSSI will not be lost to extraction, although it will come close to the SSSI. Proposed development management criteria require appropriate mitigation and buffer zone so that potential adverse impacts are avoided and proposals are required to preserve the features of the SSSI and avoid indirect impacts on the SSSI. The main wooded part of the site forms part of Oaken Wood Local Wildlife Site (LWS). This part of the LWS would be lost to development, also potentially fragmenting remaining parts of the woodland. The draft confidential Ecological Assessment³³ notes that bats, dormice, reptiles and important birds have been recorded on the new site proposed for allocation. Proposed development management criteria require the sequence of working the site to preserve connectivity within the woodland and to demonstrate no unacceptable adverse impacts on protected or notable species. Planning conditions should include a requirement to restore worked areas soon after completion and without avoidable delay. Translocation of important species is required to be undertaken where possible. The site is 6.2km from North Downs Woodland SAC and 6.5 km from Peters Pit SAC. Ditton Quarry Local Nature Reserve is 1.6km from the site. Adverse effects on these assets are unlikely. 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. Policies DM 1 and DM 3 require development to provide a net gain in biodiversity as required by proposed development management criteria.												
2. Climate change	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>0</td><td>0</td><td>0/+</td><td>H</td><td>D</td><td>N</td></tr></table> The site has been proposed as an extension to existing operations. Proposed development management criteria require the site to only be worked sequentially with existing workings and for there to be no increase in levels of HGV movements unless it is demonstrated that this will not give rise to unacceptable adverse impacts, therefore there will be no change to climate change impacts. Restoration to native woodland provides opportunities for climate change mitigation.	Short	Med	Long	Prob	Dir/Ind	Rev?	0	0	0/+	H	D	N
Short	Med	Long	Prob	Dir/Ind	Rev?								
0	0	0/+	H	D	N								
3. Community and well-being	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>0/-</td><td>0/-</td><td>+/0</td><td>H</td><td>D</td><td>Y</td></tr></table> Public Right of Way path MR108 crosses the site, running for about 2km across the site. In addition, there are several tracks through Oaken Wood which may be used for recreation by walkers and riders. These would be subject to diversions in accordance with KMWLP policy DM 14. In accordance with KMWLP Policy DM 11 Health and Amenity, diverted paths must preserve the connectivity of routes and made safe for all users, including equestrian users. Proposed development management criteria require appropriate diversions that preserve connectivity of the surrounding network of public rights of way, therefore effects should be minimised. The draft proposed Landscape Strategy³⁴ proposes the creation of additional paths and therefore long term benefits should be secured. Restoration of the	Short	Med	Long	Prob	Dir/Ind	Rev?	0/-	0/-	+/0	H	D	Y
Short	Med	Long	Prob	Dir/Ind	Rev?								
0/-	0/-	+/0	H	D	Y								

³³ Land South and West of Hermitage Quarry: Ecological Assessment, Ecology Solutions, March 2024

³⁴ Land South and West of Hermitage Quarry: Proposed Landscape Strategy 2024 Draft, Hill-Wood and Co (Kent) Ltd, 2024



	site after working should include reinstatement of PROWs where appropriate and feasible. An area Tree Preservation Order (93/10191/TPO) covers land to the north of the proposed site, the majority of which has already been lost to extraction. A strip of land along the southern and western borders of the TPO with remaining trees is covered by the proposed working area, therefore trees covered by the TPO would be lost. This would be an adverse impact in the short to medium term, but restoration to native woodland would reverse this loss in the long term. There is an AQMA along the M20 from between junction 5 and 6 extending to junction 8. It is likely that HGV and other traffic from the site would use these sections of the M20. There is another AQMA along Hermitage Lane from the hospital to the A26 and extending both east and west along the A26. Site traffic may use these roads, although HGVs will travel north to the M20 due to weight restrictions on Hermitage Lane to the south of the site entrance. The 2022 planning permission states that there should be a daily maximum combined total of 800 HGV movements a day within a single calendar month, and no higher than 900 on any one day. Proposed development management criteria limit HGV movements to existing levels unless it is demonstrated that any increase will not give rise to unacceptable adverse impacts and require impacts on AQMAs to be assessed and mitigated, therefore adverse effects will be avoided. An assessment of air quality impacts submitted with the 2022 planning application concluded that air quality impacts from these HGV movements were not significant. There are residential areas in proximity to the site, including about 10 dwellings 100-150m away along North Pole Road, on Sweets Lane and at Luckhurst Farm and Manor Farm to the north of the site. There are more dwellings (approximately 30 or so) between 150m and 350m to the east of the site along North Pole Road and North Street, and more dwellings (<10) about 500m to the south west along North Pole Road. There are other dwellings (approximately 20-30) 350m to the west of the site at East Malling Heath. The Maidstone Plan contains proposed housing allocations for 187 dwellings at Oakapple Lane, Barming at 500m from the site and 500 dwellings at East of Hermitage Lane, Maidstone at 1.3km. A Health Impact Assessment³⁵ commissioned by KCC has concluded that direct and indirect adverse effects are possible on the local population from worsening air quality, exposure to dust, noise and vibration and loss of open space. Proposed development management criteria require no unacceptable adverse effects on the health and amenity of nearby communities, in accordance with KMWLP Policy DM 11 Health and Amenity, and therefore adverse effects are unlikely.												
4. Sustainable economic growth	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>++/-</td><td>++/-</td><td>0</td><td>M</td><td>D</td><td>Y</td></tr></table> The site would make a contribution to the local supply of hard rock as a material to support economic growth, in particular via its use as a construction aggregate. The use of non-renewable resources does not constitute the most sustainable route to growth, although local supply will help to avoid increased transport costs and environmental impacts of transport. Development of the site would preserve jobs within Kent. The Case for Continuation³⁶, provided by Gallagher estimates that circa 140 direct jobs	Short	Med	Long	Prob	Dir/Ind	Rev?	++/-	++/-	0	M	D	Y
Short	Med	Long	Prob	Dir/Ind	Rev?								
++/-	++/-	0	M	D	Y								

³⁵ Health Technical Note – Version 2, WSP, February 2026

³⁶ Land to South and West of Hermitage Quarry: Suitability of Nominated Site for Allocation in Kent Mineral Sites Plan, Gallagher Aggregates Ltd, April 2026



	would be retained, with over 400 people employed indirectly through supply chains					
5. Flood risk	Short	Med	Long	Prob	Dir/Ind	Rev?
	0	0	0	H		
The site lies within flood zone 1, therefore adverse effects on flood risk are unlikely.						
6. Land	Short	Med	Long	Prob	Dir/Ind	Rev?
	-/0	-/0	0	H	D	N
The agricultural land in the northern part of the site is grade 2 (very good). Development management criteria require the soil from this area to be stripped, stockpiled and used for restoration, therefore any short or medium-term adverse impacts on land quality should be rectified although agricultural land will still be lost. Restoration plans are to restore to woodland and meadow. Any planning application is required to be accompanied by a Soil Resource Plan³⁷ as recommended by Defra and Natural England. The new site proposed for allocation is adjacent to a SSSI designated for its important geomorphology, although this is unlikely to be lost through extraction which will not encroach on the SSSI although it will come close. Proposed development management criteria require appropriate mitigation and buffer zones to avoid adverse impacts on the SSSI. Any planning application should be required to demonstrate how the development will avoid potential impacts on the SSSI.						
7. Landscape and the historic environment	Short	Med	Long	Prob	Dir/Ind	Rev?
	-/0/+	-/0/+	-/+	M	D	Y/N
The site is 3.9km from the Kent Downs National Landscape. The Landscape Assessment³⁸ commissioned by KCC has concluded that there will be no significant impacts on receptors within the National Landscape or on the designation as a whole. Proposed development management criteria require the site to be worked sequentially with the existing operations, therefore impacts are unlikely to be significantly greater than current impacts, and in the long term will be nil. Planning conditions should include a requirement to restore worked areas soon after completion and without avoidable delay. Restoration to woodland would be in keeping with the Kent Downs Management Plan³⁹. The Maidstone Landscape Character Assessment⁴⁰ identifies Oaken Wood as a particular landscape type. The description states that “The continuity of sweet chestnut coppice woodland, the lack of development and the sheer uniformity of the woodland provides a strong sense of place and local distinctiveness. However, because of the low visibility afforded by the woodland, minor change can be well screened and the overall sensitivity of the landscape is therefore moderate.” Landscape impacts from extraction could be screened but will not be a minor change and will not preserve the continuity of the coppice, therefore locally-significant adverse impacts are likely. The Landscape Assessment⁴¹ concludes that it would be difficult to avoid significant impacts on KCC Character Area Mereworth Woodlands, but that a well-considered restoration scheme could theoretically replace the lost woodland over a period of years post-extraction, restoring the character of the area to some degree. From a visual perspective, adverse impacts would						

³⁷ <https://www.gov.uk/guidance/natural-environment#agricultural-land-soil-and-brownfield-land-of-environmental-value>

³⁸ Landscape and Visual Technical Note, WSP, February 2026

³⁹ <https://kentdowns.org.uk/landscape-management/management-plan/>

⁴⁰ Maidstone Landscape Character Assessment, Maidstone Borough Council and Jacobs, March 2012 amended July 2013

⁴¹ Landscape and Visual Technical Note, WSP, February 2026



	largely be confined to receptors in close proximity to the site boundary. There is extensive woodland cover within the wider study area which would be considered to provide adequate visual screening from the proposed mineral working area. Visual impacts on nearby residential receptors and users of public rights of way could also potentially be reduced through retained woodland buffers, advance planting, bunding and phased working, which would all be subject to detailed design and delivery. Proposed development management criteria require minimisation of landscape impacts, including maintenance of buffers, advance planting, bunding and phasing. There are listed buildings in proximity to the site. It is 350m from one grade II listed building to the south, Old Cyder House Cottages. There are numerous other listed buildings within 1km to the north west, east, south east and south west. It is possible that extraction at the site could have adverse impacts on one or more of these listed buildings, although the separation distances would suggest that any impacts would be minor and proposed development management criteria require mitigation of adverse impacts. In accordance with KMWLP DM 5 Heritage Assets, any planning application will be required to demonstrate that the impacts on heritage assets in the vicinity of the new proposed site can be appropriately mitigated. There are sites recorded on the Historic Environment Record within the new site proposed for allocation and some very close to the boundary. Although there are no designated heritage assets within the new proposed site, there is potential for archaeology to be present and there is a possible 19th century shooting box which might merit preservation in situ. The Inspector's report on the Westerly Extension application noted that although there were no surface features of archaeological interest on that site, there was some potential for palaeolithic interest. In accordance with KMWLP DM 6 Historic Environment Assessment, any planning application should be accompanied by an assessment of the archaeological value of the site and a proposed plan for preserving remains in situ where possible or removing and conserving remains offsite. Proposed development management criteria require assessment of geo-archaeological and palaeolithic remains and surviving features. The site would ensure continued supply of Kentish ragstone, a material used in the restoration of historic buildings, with qualities not available with stone from elsewhere.												
8. Transport	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>0</td><td>0</td><td>0</td><td>H</td><td>D</td><td>Y</td></tr></table> The new site proposed for allocation has good access to the strategic network but the route is very sensitive at peak times. The 2022 planning permission⁴² states that there should be a daily maximum combined total of 800 HGV movements a day within a single calendar month, and no higher than 900 on any one day. If this is maintained over the life of the new site, then the proposal will not generate extra vehicle movements than the previous permission. Proposed development management criteria require levels of HGV movements not to exceed those at the existing site unless it is demonstrated that this will not give rise to unacceptable adverse impacts and for a Transport Assessment to assess cumulative impacts with existing and proposed development, therefore impacts on transport are unlikely. Transport impacts will cease when the site is restored.	Short	Med	Long	Prob	Dir/Ind	Rev?	0	0	0	H	D	Y
Short	Med	Long	Prob	Dir/Ind	Rev?								
0	0	0	H	D	Y								
9. Water	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>0</td><td>0</td><td>0</td><td>M</td><td>D</td><td>N</td></tr></table>	Short	Med	Long	Prob	Dir/Ind	Rev?	0	0	0	M	D	N
Short	Med	Long	Prob	Dir/Ind	Rev?								
0	0	0	M	D	N								

⁴² Ref. TM/21/42 Decision Notice, <https://www.kentplanningapplications.co.uk/Planning/Display/KCC/TM/0289/2020>



	The site is underlain by principal and secondary bedrock and superficial aquifers. It is classed as having medium and medium-high groundwater vulnerability in the north of the site and high groundwater vulnerability in the south and east of the site and lies within a Source Protection Zone 3. There is the potential for impacts on water. Proposed development management criteria require it to be demonstrated that there are no unacceptable adverse impacts on the water environment. In accordance with KMWLP Policy DM 10 Water Environment, developments must not result in the deterioration of physical state, water quality or ecological status of any water resource and waterbody.					
10.Waste	Short	Med	Long	Prob	Dir/Ind	Rev?
	0	+	+	H	D	N
	Restoration of the site will be achieved through the importation of inert waste. Policy CSW 11 in the KMWLP provides for the deposit of inert waste which is not part of a disposal operation, therefore it will be managing waste at a higher level of the waste hierarchy than disposal.					

Table C.3 – Site M3: Chapel Farm

Sustainability Objective	Comments					
1. Biodiversity	Short	Med	Long	Prob	Dir/Ind	Rev?
	+	+	+	M	D	N
	The site has Ancient Woodland (Roughett Shaw) immediately adjacent to the access route and therefore the proposal must ensure that the ancient woodland area will not be subject to any loss or degradation. Development management criteria require a buffer to be maintained around the woodland and protected trees and therefore adverse effects are unlikely.					
	Priority habitats are adjacent to the site. Due to the potential for ground nesting breeding birds and protected/notable species within the woodland, hedgerow and water bodies (great crested newts, reptiles, bats and breeding birds) there will be a need for ecological surveys to be submitted within any planning application to demonstrate that the impacts can be appropriately mitigated. Development management criteria require a detailed ecological appraisal which ensures no unacceptable adverse impacts. The restoration scheme should demonstrate that it is increasing the area of suitable habitat for biodiversity. Development management criteria for the site require a net gain in biodiversity to be secured. The timeframe for this benefit to be delivered is not known, but is unlikely to be in the short term.					
	Lenham Heath & Chilston Park Local Wildlife Site is adjacent to the allocated site, immediately to the south of Lenham Heath Road. Oxley Wood Local Wildlife Site is also near to the site to the north west. Bull Heath Pit Local Wildlife Site is also nearby, situated to the east of Bull Hill. Proposals are required to be assessed for any potential adverse impacts on these wildlife sites, including through disturbance caused by noise and traffic. Development management criteria require the LWS not to be adversely impacted.					
2. Climate change	The allocated site is in proximity to two sites that have been designated as SSSI, Lenham Quarry and Hart Hill (at 800m and 2.5km respectively). Given the distance from the proposed workings, adverse effects are unlikely.					
	Short	Med	Long	Prob	Dir/Ind	Rev?
	-	-	+	H	D	N
The site is a new site rather than a phased extension to existing workings and therefore will add to emissions from HGV movements and other site traffic and on-site processing. This will have a negative impact on climate change, albeit small when considered in terms of the emissions in the county as a						

	whole. Restoration to agricultural use will provide minor benefits for climate change adaptation.												
3. Community and well-being	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>0</td><td>0</td><td>0</td><td>H</td><td>D</td><td>Y</td></tr></table> Several paths cross the site, including the important Stour Valley Walk, and will be affected by the proposed workings. These are required to be diverted to maintain the connectivity of footpaths in the area although routes will be longer and less convenient. Appropriate screening is required to be provided to mitigate the visual impacts to users of the paths, and if necessary buffers should be provided to ensure safety. Some tranquillity along the footpaths will be lost although effects are unlikely to be significant in the area, given the site's location adjacent to two railway lines and the M20. Development management criteria require a lighting, noise, dust, and vibration management plan should be completed, setting out how unacceptable impacts will be avoided and therefore significant impacts are unlikely. Residential properties near to the site require screening from visual impacts with appropriate planting. The site is rural and remote from any significant area of residential development or AQMAs. Lenham is approximately 700m from the site. There are a small number of individual air quality sensitive receptors within 120m of the site: along Lenham Heath Road, to the north of the Lenham Heath Road and dwellings at the end of Mount Castle Lane to the east. These are unlikely to be at risk of impacts from dust but there may be health risks from HGV emissions. Mitigation against any potential adverse impacts from quarry operations are considered to be fully achievable and should be demonstrated in any planning application. However, the Maidstone AQMA could be a constraint to development depending on the type and number of HGVs that may travel through it. A planning application should be accompanied by a Transport Assessment which shows how potential adverse impacts on the AQMA will be mitigated. A routeing strategy is unlikely to be able to avoid increasing HGV use of the M20.	Short	Med	Long	Prob	Dir/Ind	Rev?	0	0	0	H	D	Y
Short	Med	Long	Prob	Dir/Ind	Rev?								
0	0	0	H	D	Y								
4. Sustainable economic growth	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>++/-</td><td>++/-</td><td>++/-</td><td>H</td><td>D</td><td>N</td></tr></table> The site would make a contribution to the supply of soft sand 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. Development of site would preserve jobs within Kent, both directly and indirectly.	Short	Med	Long	Prob	Dir/Ind	Rev?	++/-	++/-	++/-	H	D	N
Short	Med	Long	Prob	Dir/Ind	Rev?								
++/-	++/-	++/-	H	D	N								
5. Flood risk	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>0</td><td>0</td><td>0</td><td>M</td><td>D</td><td>N</td></tr></table> The site does not lie within a flood zone. However, any planning application for an area greater than 1 hectare 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.	Short	Med	Long	Prob	Dir/Ind	Rev?	0	0	0	M	D	N
Short	Med	Long	Prob	Dir/Ind	Rev?								
0	0	0	M	D	N								
6. Land	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>-</td><td>-</td><td>0</td><td>H</td><td>D</td><td>N</td></tr></table> Agricultural Land Classification maps produced by Natural England show the land at the site to be grade 2 agricultural land. If the site is worked this will be lost for the duration of the works. The restoration of the site would be required to be sensitive to the agricultural afteruse of the site in accordance with Policy DM 19 Restoration, Aftercare and After-use. Restoration to agriculture using existing soils is required by the MSP and therefore in the long term impacts are likely to be neutral.	Short	Med	Long	Prob	Dir/Ind	Rev?	-	-	0	H	D	N
Short	Med	Long	Prob	Dir/Ind	Rev?								
-	-	0	H	D	N								
7. Landscape and the	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>0/-</td><td>0/-</td><td>0</td><td>M</td><td>D</td><td>N</td></tr></table>	Short	Med	Long	Prob	Dir/Ind	Rev?	0/-	0/-	0	M	D	N
Short	Med	Long	Prob	Dir/Ind	Rev?								
0/-	0/-	0	M	D	N								

historic environment	The site lies within the setting of the Kent Downs National Landscape. The site and the proposed haul route are particularly prominent from the National Landscape to the north, including from an extensive tract of the North Downs Way national trail and other public rights of way and roads to the north of the A20. The site is an area of open landscape rising from Lenham Heath Road towards the A20. Although it is well screened from Lenham Heath Road to the south by dense hedges and trees, the other boundaries are in open farmland and this should require screening. The presence of minerals 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; the introduction of plant and equipment and light and the resultant change to the visual context of the landscape. Potential visibility from the higher land within the National Landscape to the north could also have indirect effects on character in that area. The Landscape and Visual Impact Assessment of the allocated site concludes that visual effects on local receptors would be significant but that visual impacts on the National Landscape would not be significant. Development management criteria require mitigation of visual impacts, although residual impacts on local receptors are not known. Restoration is to agriculture in keeping with the Kent Downs Management Plan⁴³ therefore long-term effects should be avoided. There are listed properties very close to the site, including the Grade II* Royton Manor, together with important archaeological remains of Royton Chapel which is Grade II listed, and other Grade II listed properties of Chapel Mill, and Mount Castle Farm to the east. To the south is the historic Park & Garden of Chilston Park which is Grade II listed. The majority of this is cut off from Lenham Heath Road and the site by the M20 and HS1 railway which cut through the park, although a strip of woodland exists north of this. The setting of these assets may be adversely affected by mineral operations, although a Cultural Heritage Appraisal in March 2018 concluded no significant adverse effects are likely. Any planning application is required to demonstrate no unacceptable adverse impacts on these assets and their settings in accordance with Policy DM 5 Heritage Assets and therefore adverse impacts are unlikely. The Lenham Conservation Area is remote from the site and local topography means the proposals should have little impact on it.																	
8. Transport	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>0</td><td>0</td><td>0</td><td>H</td><td>D</td><td>Y</td></tr></table>	Short	Med	Long	Prob	Dir/Ind	Rev?	0	0	0	H	D	Y	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 accommodate the necessary vehicle movements. It is proposed to work the site following completion of the nearby Lenham Quarry and that HGV movements will be no greater than existing. A planning application is required to be accompanied by a transport assessment that demonstrates the road network can accommodate the required vehicle movements safely and without detriment to the network, in accordance with Policy DM 13 Transportation of Minerals and Waste. This should be required to consider cumulative impacts with proposed housing growth in the Lenham area in the Maidstone Borough Local Plan. Transport impacts will cease when the site is restored.				
Short	Med	Long	Prob	Dir/Ind	Rev?													
0	0	0	H	D	Y													
9. Water	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>0</td><td>0</td><td>0</td><td>M</td><td>D</td><td>N</td></tr></table>	Short	Med	Long	Prob	Dir/Ind	Rev?	0	0	0	M	D	N	This site overlies the Folkestone Sands aquifer and is partly in a Source Protection Zone 3 for a public water abstraction borehole. Adverse impacts				
Short	Med	Long	Prob	Dir/Ind	Rev?													
0	0	0	M	D	N													

⁴³ <https://kentdowns.org.uk/landscape-management/management-plan/>



	from mineral operations are not expected. Development management criteria require protection of the aquifer and therefore adverse impacts are unlikely. Sewerage infrastructure crosses the site, and a wastewater treatment works is adjacent. Any planning application must be accompanied by adequate proposals to show the sewerage infrastructure will not be adversely affected. This site overlays a length of the River Stour at Lenham and adverse impacts from discharge, diversion of the watercourse or alteration of groundwater levels are possible. Any planning application is required to demonstrate that there will be no adverse impacts on the river and the hydraulic integrity of the river, its tributaries and aquifers will not be compromised in accordance with Policy DM 10 Water Resources.					
10.Waste	Short	Med	Long	Prob	Dir/Ind	Rev?
	0	0	0	H		
No impact on sustainable waste management objectives.						

Table C.4 – Site M10: Moat Farm

Sustainability Objective	Comments					
1. Biodiversity	Short	Med	Long	Prob	Dir/Ind	Rev?
	0	0	+	H	D	N
	Being predominantly arable fields surrounded by hedgerows and ditches, the site has the potential to support breeding and/or wintering birds, reptiles, great crested newts and water voles. The area of ancient woodland to the north of the site requires an appropriate buffer. Any planning application is required to be accompanied by evidence to demonstrate that appropriate mitigation can be implemented to avoid adverse impacts on protected/notable species and avoid loss or degradation of the ancient woodland. Development management criteria for the site require a net gain in biodiversity to be secured. The timeframe for this benefit to be delivered is not known, but is unlikely to be in the short term.					
2. Climate change	Short	Med	Long	Prob	Dir/Ind	Rev?
	0	0	0/+	H	D	N
	The site is allocated as an extension to existing operations, with phasing to work this and the allocated Stonecastle Farm site (M13) sequentially, such that they are not developed 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. Restoration to wetland can provide climate change adaptation benefits given the site's location within a flood zone.					
3. Community and well-being	Short	Med	Long	Prob	Dir/Ind	Rev?
	0/-	0/-	0	H	D	Y
	Footpaths cross the site which will be diverted during operations and possibly permanently. These footpaths should be diverted such that connectivity of the paths and safety is maintained. Development management criteria for the site require connectivity to be preserved. A lighting, noise, dust, and vibration management plan is required, setting out how unacceptable impacts will be avoided and therefore impacts on tranquillity will be minimised. The nearest residential building is at Moat Farm and is approximately 170m from the site and which may be sensitive to deposited dust and potentially noise, vibration and visual impacts. Development management criteria require a lighting, noise, dust, and vibration management plan to set out how unacceptable impacts will be avoided. 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 to be significant other than on paths in the immediate vicinity and within the site itself. Views of the site are likely to be seen from residential properties although screening is possible and should avoid significant impacts.					
4. Sustainable economic growth	Short	Med	Long	Prob	Dir/Ind	Rev?
	++/-	++/-	++/-	H	D	N
	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. Development of site would preserve jobs within Kent, both directly and indirectly.					
5. Flood risk	Short	Med	Long	Prob	Dir/Ind	Rev?
	0	0	0	M	D	N
	The site lies in flood zone 3. Any planning application must be accompanied by a detailed flood risk assessment with measures identified to minimise and/or mitigate flood risk, therefore adverse impacts are unlikely.					
6. Land	Short	Med	Long	Prob	Dir/Ind	Rev?
	0	0	0/-	M	D	Y/N
	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 and therefore land quality will not be restored. The site is within the Metropolitan Green Belt. Development management criteria require any proposal to demonstrate how it is consistent with national and local policy on Green Belt.					
7. Landscape and the historic environment	Short	Med	Long	Prob	Dir/Ind	Rev?
	-/0	-/0	?/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. A lighting management plan is required to show how unacceptable impacts will be avoided. 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 three others at Stonecastle Farm, but the listings reference the fabric of the buildings and not the setting, therefore significant impacts on the assets are not likely. Any planning application must be accompanied by an archaeological impact assessment of assets in the vicinity of the site and demonstrate no unacceptable adverse effects on listed buildings and their settings and therefore adverse impacts are unlikely.					
8. Transport	Short	Med	Long	Prob	Dir/Ind	Rev?
	0	0	0	M	D	Y
	It is understood that access to the site will be via the existing purpose-built access currently serving Stonecastle Farm Quarry onto the A228 to the east of the site. There is the potential for the allocated site to create adverse impacts on the local highway network and junction improvements may be 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 (Moat Farm and Stonecastle Farm) would be worked 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 developments would not result in an unacceptable impact on the road network or safety. Phasing of the works with the existing operations should ensure that no additional HGV movements are created on the road network. Transport impacts will cease when the site is restored. Development management criteria require a transport assessment to demonstrate compliance with KMWLP policy DM 13 Transportation of Minerals and Waste. This should consider cumulative impacts with any development in Capel parish in the Tunbridge Wells draft Local Plan. Transport impacts will cease when the site is restored.												
9. Water	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>0</td><td>0</td><td>0</td><td>M</td><td>D</td><td>N</td></tr></table> The site overlies an aquifer and lies partially within groundwater source protection zone 3 for a public water borehole. Wet working is required to avoid the need for dewatering. The Alder Stream and smaller ditches run through the site. There is the potential for negative impacts on the aquifer, stream and ditches. In accordance with policy DM 10 Water Environment, any planning application must be accompanied by a detailed assessment of the hydrological environment and show how any unacceptable risks will be adequately mitigated. This should include an assessment of the relationship to the previous, now flooded, excavations and should demonstrate how the restoration to wetland will preserve the integrity and function of the Alder Stream and drainage ditches on the site.	Short	Med	Long	Prob	Dir/Ind	Rev?	0	0	0	M	D	N
Short	Med	Long	Prob	Dir/Ind	Rev?								
0	0	0	M	D	N								
10.Waste	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>0</td><td>0</td><td>0</td><td>H</td><td></td><td></td></tr></table> No impact on sustainable waste management objectives.	Short	Med	Long	Prob	Dir/Ind	Rev?	0	0	0	H		
Short	Med	Long	Prob	Dir/Ind	Rev?								
0	0	0	H										

Table C.5 – Site M13: Stonecastle Farm Quarry Extension

Sustainability Objective	Comments					
1. Biodiversity	Short	Med	Long	Prob	Dir/Ind	Rev?
	-	-	+	H	D	N
	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 buffer zones and mitigation to address impacts on the LWS and therefore adverse impacts should be minimised. 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 loss or degradation of the ancient woodland, which could include provision of a suitable buffer. 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 hare, great crested newts and wintering/breeding birds. Habitat within the site will be lost with a consequent negative impact on biodiversity value. Development management criteria require a detailed ecological appraisal with mitigation to ensure no unacceptable impacts on biodiversity assets. Restoration					

	schemes are required to provide additional woodland planting, including native species, to compensate for the loss of woodland. There are records of Nuttall's pondweed and Crassula in the area. Development management criteria require these to be appropriately managed. Development management criteria for the site require a net gain in biodiversity to be secured. The timeframe for this benefit to be delivered is not known, but is unlikely to be in the short term.												
2. Climate change	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>0</td><td>0</td><td>0/+</td><td>H</td><td>D</td><td>N</td></tr></table> The site is allocated as an extension to existing operations, with phasing to work this and the allocated Moat Farm site (M10) to be sequential. Therefore, there would be no concurrency of operations at Moat Farm or Stonecastle Farm therefore extraction would be at the same rate of mineral extraction of 120,000 tonnes per annum (the same as 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 levels. Restoration to wetland can provide climate change adaptation benefits given the site's location within a flood zone.	Short	Med	Long	Prob	Dir/Ind	Rev?	0	0	0/+	H	D	N
Short	Med	Long	Prob	Dir/Ind	Rev?								
0	0	0/+	H	D	N								
3. Community and well-being	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>0</td><td>0</td><td>0</td><td>H</td><td>D</td><td>Y</td></tr></table> The allocated site is unlikely to have significant impacts on health and wellbeing from dust, noise, visual amenity, light or vibration. The nearest properties are 230m from the site and screened by woodland. The Medway Valley Walk long distance path is located north of the site but at close range views are prevented by mature woodland. There is a public right of way WT168 which crosses Tarmac land beyond the limits of extraction and this will be retained throughout. The publicly accessible visual receptors in this area with views towards the site are a limited section of Hartlake Road and the nearby public footpath. It is unlikely that there would be significant effects on residential properties given the distance from the site, or on users of the paths if the boundary vegetation is retained. Some tranquillity may be lost while the site is operational, but a lighting, noise, dust, and vibration management plan should be completed, setting out how unacceptable impacts will be avoided therefore impacts on tranquillity will be minimised.	Short	Med	Long	Prob	Dir/Ind	Rev?	0	0	0	H	D	Y
Short	Med	Long	Prob	Dir/Ind	Rev?								
0	0	0	H	D	Y								
4. Sustainable economic growth	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>++/-</td><td>++/-</td><td>++/-</td><td>H</td><td>D</td><td>N</td></tr></table> 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. Development of site would preserve jobs within Kent, both directly and indirectly.	Short	Med	Long	Prob	Dir/Ind	Rev?	++/-	++/-	++/-	H	D	N
Short	Med	Long	Prob	Dir/Ind	Rev?								
++/-	++/-	++/-	H	D	N								
5. Flood risk	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>0</td><td>0</td><td>0</td><td>M</td><td>D</td><td>N</td></tr></table> The site lies in flood zone 3. Any planning application must be accompanied by a detailed flood risk assessment with measures identified to minimise and/or mitigate flood risk, therefore adverse impacts are unlikely.	Short	Med	Long	Prob	Dir/Ind	Rev?	0	0	0	M	D	N
Short	Med	Long	Prob	Dir/Ind	Rev?								
0	0	0	M	D	N								
6. Land	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>-/?</td><td>-/?</td><td>0/-</td><td>H</td><td>D</td><td>N</td></tr></table> Agricultural Land Classification maps produced by Natural England show the land at the site to be grade 3 agricultural land. A survey carried out in 1998 showed 81% of the land to be grade 3b and the remainder grade 2 and 3a. If the site is worked this will be lost, but as the soil is mostly grade 3b, this is not a significant adverse effect. Restoration is to landscaped lakes and therefore land will not be restored.	Short	Med	Long	Prob	Dir/Ind	Rev?	-/?	-/?	0/-	H	D	N
Short	Med	Long	Prob	Dir/Ind	Rev?								
-/?	-/?	0/-	H	D	N								

	The site is within the Metropolitan Green Belt. Development management criteria require any proposal to demonstrate how it is consistent with national and local policy on Green Belt.					
7. Landscape and the historic environment	Short	Med	Long	Prob	Dir/Ind	Rev?
	?/0	?/0	?/0	M	D	Y
	The allocated site lies 1.5km from the High Weald National Landscape but will be well-screened from the National Landscape if boundary vegetation is retained. However, there may be filtered views from the National Landscape in winter, depending on the location of the fixed plant. A lighting management plan is required which sets out how unacceptable adverse impacts will be avoided. Restoration is to reedbeds and lakes, in line with objective G1 of the High Weald Management Plan ⁴⁴ .					
	There are three grade II listed buildings close to the site access, although with proposals to extract at 120,000 tonnes as existing, impacts from HGVs on this asset will be no more than current impacts. There are three grade II listings associated with Hartlake Farm to the north of the site but these are screened by dense woodland and therefore significant impacts are unlikely. The 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 allocated 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 designated or undesignated assets. Development management criteria require a full archaeological impact assessment.					
8. Transport	Short	Med	Long	Prob	Dir/Ind	Rev?
	0	0	0	M	D	Y
	A Transport Statement has been produced which has concluded that subject to some minor repairs and routine maintenance, the existing access to the site is acceptable to accommodate the proposed operations at Stonecastle Farm Quarry, assuming the sites (both Moat farm and Stonecastle Farm) would be worked 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. Development management criteria require a transport assessment to demonstrate no unacceptable adverse impacts on the road network. This should consider cumulative impacts with any development in Capel parish in the Tunbridge Wells draft Local Plan. Transport impacts will cease when the site is restored.					
9. Water	Short	Med	Long	Prob	Dir/Ind	Rev?
	0	0	0	H	D	N
	The allocated 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. A hydrological and hydrogeological appraisal has been undertaken of the potential impacts of the existing consented site which concluded adverse					

⁴⁴ <https://highweald.org/guidance/>

	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. Development management criteria for the site require that it is demonstrated that there will be no adverse impacts on hydrology or hydrogeology, therefore adverse impacts are unlikely. 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, 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 curtilage of the workings will be retained. The development management criteria for the site requires this to be demonstrated and therefore adverse effects are unlikely.												
10.Waste	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>0</td><td>0</td><td>0</td><td>H</td><td></td><td></td></tr></table> No impact on sustainable waste management objectives.	Short	Med	Long	Prob	Dir/Ind	Rev?	0	0	0	H		
Short	Med	Long	Prob	Dir/Ind	Rev?								
0	0	0	H										



Appendix D – Appraisal of Option

Table D.5 – Key

Impacts	Probability of Effects	Direct or Indirect Effects	Reversibility
++ significant positive effect + some positive effect 0 no effect - some adverse effect -- significant adverse effect ? uncertain effect	L low probability M medium probability H high probability	D direct effect I indirect effect	Y reversible effect N not reversible i.e. permanent effect
Where multiple symbols are shown separated by '/', this is to indicate that more than one type of effect is predicted.			

Table D.2 – Importation of Hard Rock

Sustainability Objective	Comments						
1. Biodiversity	Short	Med	Long	Prob	Dir/Ind	Rev?	
	?	?	?	L	I	?	
2. Climate change	Short	Med	Long	Prob	Dir/Ind	Rev?	
	-	-	-	M	D	Y	

Importation of hard rock from elsewhere in the UK may have impacts on biodiversity and geodiversity, but this is dependent on where the mineral comes from and the conditions at those sites. The control of impacts at those sites is a matter for the relevant Mineral Planning Authorities.

Importation of hard rock to meet local needs in Kent England is likely to have impacts on climate change from the increased need for transport of mineral. It is assumed that, as currently, this will be imported by rail or sea, with a much smaller distance of road transport from a quarry to a port or rail depot. It is assumed that, once imported into Kent, it will be distributed in a similar pattern as if it were sourced from Hermitage Quarry. An assessment of the carbon impacts by WSP⁴⁵ looked at several scenarios for supply from locations outside Kent (Somerset, Norway, Scotland, East Midlands, Northern Ireland) and assessed the carbon impacts of import into Kent from each location, the primary mode of transport for each being either rail or sea. This found that there is a significant carbon impact from importing crushed hard rock into Kent. Transport emissions were highest for scenario 2 (Norway) (636,037 tonnes of carbon dioxide equivalent (tCO₂e) over 15 years, or 42,402 tCO₂e per annum) and lowest for scenario 1 (Somerset) (198,804 tCO₂e over 15 years, or 13,254 tCO₂e per annum). The results showed that whilst the mode of transport has a significant impact on the emissions, since the transport distances were drastically smaller in rail freight transport, it became a key factor in the determination of transport emissions. The actual effect on emissions is not known with certainty as the quantities of mineral likely to be sourced from different locations is unknown. For comparison purposes, UK government data⁴⁶ shows that the total emissions

⁴⁵ Carbon Assessment for Potential Extension of Hermitage Quarry, WSP, March 2026

⁴⁶ <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-greenhouse-gas-emissions-statistics-2005-to-2023>

	for transport in Kent in 2023 were approximately 2,989,100 tCO ₂ e, so the scenarios would be equivalent to between 0.44% and 1.42% of Kent's total annual transport emissions. The WSP assessment also concluded that restoration to woodland would have a net benefit in reducing carbon emissions of 2,615 tC, due to changing from a managed plantation to a restored woodland left undisturbed. It further concluded that reusing hassock as a secondary aggregate in place of imported primary aggregate would avoid 3000-9000 tonnes of CO ₂ e annually, primarily by reducing transport-related emissions.																	
3. Community and well-being	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>?</td><td>?</td><td>?</td><td>L</td><td>I</td><td>?</td></tr></table>	Short	Med	Long	Prob	Dir/Ind	Rev?	?	?	?	L	I	?	Importation of hard rock from elsewhere in the UK may have impacts on communities and their wellbeing in proximity to the sites where extraction takes place, from impacts on amenity and potentially also from impacts on air quality, but this is dependent on where the mineral comes from and the conditions at those sites. The control of impacts at those sites is a matter for the relevant Mineral Planning Authorities.				
Short	Med	Long	Prob	Dir/Ind	Rev?													
?	?	?	L	I	?													
4. Sustainable economic growth	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>-</td><td>-</td><td>-</td><td>H</td><td>I/D</td><td>N</td></tr></table>	Short	Med	Long	Prob	Dir/Ind	Rev?	-	-	-	H	I/D	N	Importation of hard rock from elsewhere in the UK is likely to have adverse economic impacts from increased transport costs affecting the cost of the mineral. The draft Local Aggregates Assessment for Kent ⁴⁷ notes that aggregates are a relatively low cost and heavy raw material commodity and that transport costs are a significant factor in their profitability and thus viability. Around 140 direct jobs would be lost in Kent with the closure of Hermitage Quarry, with loss of indirect support for a further 400 jobs. Jobs would be supported at quarries outside of Kent.				
Short	Med	Long	Prob	Dir/Ind	Rev?													
-	-	-	H	I/D	N													
5. Flood risk	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>?</td><td>?</td><td>?</td><td>L</td><td>I</td><td>?</td></tr></table>	Short	Med	Long	Prob	Dir/Ind	Rev?	?	?	?	L	I	?	Importation of hard rock from elsewhere in the UK may have impacts on flood risk, but this is dependent on where the mineral comes from and the conditions at those sites. The control of impacts at those sites is a matter for the relevant Mineral Planning Authorities.				
Short	Med	Long	Prob	Dir/Ind	Rev?													
?	?	?	L	I	?													
6. Land	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>?</td><td>?</td><td>?</td><td>L</td><td>I</td><td>?</td></tr></table>	Short	Med	Long	Prob	Dir/Ind	Rev?	?	?	?	L	I	?	Importation of hard rock from elsewhere in the UK may have effects on land and soil quality, but this is dependent on the conditions at the sites where the mineral is sourced. The control of impacts at those sites is a matter for the relevant Mineral Planning Authorities.				
Short	Med	Long	Prob	Dir/Ind	Rev?													
?	?	?	L	I	?													
7. Landscape and the historic environment	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>-/?</td><td>-/?</td><td>-/</td><td>H/L</td><td>I</td><td>Y/?</td></tr></table>	Short	Med	Long	Prob	Dir/Ind	Rev?	-/?	-/?	-/	H/L	I	Y/?	Kentish ragstone is used in heritage restoration projects, with qualities difficult to find in imported stone, therefore adverse impacts on the built historic environment are likely. Importation of hard rock from elsewhere in the UK may have effects on landscape and the historic environment in the locality of the quarries, but this is dependent on the conditions at the sites where the mineral is sourced. The control of impacts at those sites is a matter for the relevant Mineral Planning Authorities.				
Short	Med	Long	Prob	Dir/Ind	Rev?													
-/?	-/?	-/	H/L	I	Y/?													
8. Transport	<table><tr><th>Short</th><th>Med</th><th>Long</th><th>Prob</th><th>Dir/Ind</th><th>Rev?</th></tr><tr><td>-</td><td>-</td><td>-</td><td>M</td><td>D</td><td>?</td></tr></table>	Short	Med	Long	Prob	Dir/Ind	Rev?	-	-	-	M	D	?					
Short	Med	Long	Prob	Dir/Ind	Rev?													
-	-	-	M	D	?													

⁴⁷ Local Aggregates Assessment 2025 (draft), KCC, March 2026

	Importation of hard rock to meet local needs in Kent and the wider South East of England will increase the need for the transport of mineral. The WSP assessment ⁴⁸ investigated transport distances associated with a number of potential scenarios for sourcing mineral outside Kent. The transport distances involved in each scenario varied between 284km (Somerset) and 1528km (Scotland). There is a greater likelihood of negative impacts on air quality from increased transport and negative impacts may be caused on road and rail networks, noise and disturbance, depending on route and distance.					
9. Water	Short	Med	Long	Prob	Dir/Ind	Rev?
	?	?	?	L	I	?
	Importation of hard rock from elsewhere in the UK may have effects on hydrology, hydrogeology and water quality, but this is dependent on the conditions at the sites where the mineral is sourced. The control of impacts at those sites is a matter for the relevant Mineral Planning Authorities.					
10. Waste	Short	Med	Long	Prob	Dir/Ind	Rev?
	0	0	0	H		
	Not relevant to sustainable waste management objectives.					

⁴⁸ Carbon Assessment for Potential Extension of Hermitage Quarry, WSP, March 2026



Appendix E – Contribution of Other Plans and Strategies to Cumulative Effects

Kent Minerals and Waste Local Plan 2024-39, Kent County Council, March 2025

The adopted KMWLP identifies the Dungeness nuclear site for waste treatment and storage.

Contribution to Cumulative Effects

The Dungeness site is not close to the new site proposed for allocation on Land South and West of Hermitage Quarry or existing sites allocated in the MSP, therefore cumulative impacts are not likely in combination with an MSP updated to include the new site proposed for allocation.

Local Transport Plan 5: Striking the Balance, Kent County Council, December 2024

The Council's policy objectives include the following:

- i) Increase resilience of the road network serving the Port of Dover and Eurotunnel by adding holding capacity for HGVs across the southeast region to support establishment of a long term alternative to Operation Brock
- ii) Increase resilience of the road network servicing the Port of Dover through delivery of the bifurcation strategy including improvements to the M2 / A2 road corridor and its links to the M20 and a new Lower Thames Crossing for traffic towards the north, and utilising further non-road freight opportunities.
- iii) Reduce the volume of carbon dioxide equivalent emissions entering the atmosphere associated with surface transport activity on the KCC managed highway network by an amount greater than our forecast "business as usual" scenario. This means achieving a greater fall than those currently forecast of 9% by 2027, 19% by 2032 and 29% by 2037.
- iv) aim to obtain further funding to deliver the outcomes of our Bus Service Improvement Plan (or its successor) beyond its current horizon of 2024/25.
- v) identify and support industry delivery of priority railway stations for accessibility improvements and route improvements to reduce journey times and improve reliability.



- vi) aim to deliver walking and cycling improvements at prioritised locations in Kent to increase activity levels and support Kent's diverse economy, presented in a Kent Cycling and Walking Infrastructure Plan.

The Council will continue working with developers, Local Planning Authorities, National Highways, and government to ensure the proposals from LTP4 are delivered. They are:

- i) Bearsted Road
- ii) The Paddock Wood junction improvements at Mascalls Court Road with Badsell Road
- iii) The Sturry Link Road in Canterbury
- iv) The A2-A249 Key Street junction in Sittingbourne
- v) The A20 London Road junction with Mills Road and Hall Road in Aylesford

KCC works within a collective of local authorities called Transport for the South East (TfSE). Primarily funded by the government, with some funding support also from its member authorities, TfSE is responsible for championing the needs of the region and is well-placed to make the argument for proposals with a cross-boundary impact.

The transport schemes TfSE are focused on progressing are:

- i) Cross-boundary rail services from Kent towards locations like Gatwick Airport in West Sussex.
- ii) Improvements to the rail line from Ashford International towards Hastings in East Sussex.
- iii) Extension of Elizabeth line services into north Kent from the line's current terminus at Abbey Wood.
- iv) The A21 National Highways corridor through southern Kent and into East Sussex.
- v) Freight gauge enhancements to benefit freight transport from the midlands and north all the way to the Channel crossing in Kent.

Strategic road network proposals include the following:

- i) M2 Junction 4 Capacity - Medway, on the border with Maidstone Borough. Strategic aims: to ensure the junction avoids delays for the Strategic Road



Network, to maintain the planned benefits of the Lower Thames Crossing and the bifurcation strategy which concerns the A2/M2 strategic road corridor.

- ii) M2 Corridor Capacity - Medway to Swale, from junction 4 to junction 7 of the M2. Strategic aims: To ensure the corridor avoids delays for the Strategic Road Network, to maintain the planned benefits of the Lower Thames Crossing and the bifurcation strategy which concerns the A2/M2 strategic road corridor.
- iii) International haulage traffic management - Countywide, with a focus on the approaches to the channel crossing terminals of Dover and Eurotunnel. Strategic aims: to increase resilience on the M2/A2 and M20/A20 road corridors to the Port of Dover, to support the KCC bifurcation strategy; to relieve congestion on the approach to the Port of Dover and Channel Tunnel rail terminal at Folkestone, to support international trade and travel and avoid disrupting local traffic for the benefit of the quality of life of Kent residents, businesses, and visitors; to reduce the need for traffic management on-highway, including a permanent solution to remove the need for Operation Brock, by ensuring suitable vehicle management facilities exist across the corridor including at the international terminals; to ensure that international traffic is kept to the correct routes to reduce disruption and disturbance in local communities in Kent.
- iv) A21 Enhancement - Tunbridge Wells Borough, A21 route between Pembury and Lamberhurst. Strategic aims: to reduce traffic congestion and delay and ensure the route can accommodate growth within southern Kent and East Sussex
- v) Further trunking the local road network - Maidstone District, A229 between M20 junction 6 to M2 junction 3; and A249 between M20 junction 7 and M2 junction 5. Strategic aims: to obtain national recognition of the high volume of local and longer distance traffic using the routes, the criticality of their role in enabling strategic movement of traffic within and through Kent; to ensure that the roads receive long term and sustained investment for their maintenance, renewal, operation and upgrade as part of the national Road Investment Strategy delivered by National Highways, including delivery of National Highway policy aims concerning safety and the environment.

Local road network proposals include the following:

- i) A229 Blue Bell Hill - Maidstone Borough. Strategic aims: to improve the reliability of journey times and reduce congestion so that this critical route between the M2 and M20 can accommodate growth in traffic from new land uses and the Lower Thames Crossing's impact on the routing of traffic; to make best use of the



existing road network, by enhancing it to deliver better outcomes for road safety, public transport, pedestrians and cyclists, and air quality; to ensure the effects of the Lower Thames Crossing on traffic movements are addressed on Blue Bell Hill and its junctions.

- ii) A228-A264 Corridor between West Malling to Tunbridge Wells - Tonbridge and Malling and Tunbridge Wells Boroughs. Strategic aims: to ensure the corridor delivers reliable journey times and sufficient capacity to meet the needs of its users and from future land uses along the corridor; to co-ordinate the design of interventions along the corridor to ensure they work effectively together, across District boundaries, to meet user needs; to find opportunities to deliver improvements for public transport, road safety. and walking and cycling along the corridor.

Transport schemes that have a countywide impact (particularly in terms of supporting sustainable travel) are:

- i) Local road Freight Management. Strategic aims: to support effective management of HGVs across the local road network to mitigate impacts on local communities, whilst ensuring Kent's businesses and their freight and logistics needs are supported; to support the private sector led delivery of new parking capacity and welfare facilities, subject to the merits of each specific proposal that comes forward through the planning system; to promote the use of alternatives to road haulage to reduce the burden on Kent's local roads, such as rail and water-borne freight.
- ii) Development management principles. Strategic aims: to ensure Local Planning Authorities and developers work effectively with KCC to effectively design development and local transport so as to reduce its pressure on the existing road network and embed sustainable travel from the start; to implement an infrastructure-first approach to secure initial improvements to the whole transport system to reduce pressure on the road network; to recognise the uncertainty in how occupants of new developments will travel by assessing a range of outcomes and ensuring the right mitigations are implemented in response to observed impacts.
- iii) Increasing rail freight for international goods movements. Strategic aims: to reduce the burden of haulage traffic on Kent's roads and communities by making better use of the rail network for freight transport between Europe and the UK; to support the decarbonisation of transport to deliver the government's



Decarbonising Transport strategy – CO2 emissions per tonne of cargo delivered by rail can be 76% lower than by road, whilst also creating 10 times less particulate matter and 15 times less nitrogen oxides; for the rail freight network to be planned and managed in a coordinated manner across the regions of England.

Contribution to Cumulative Effects

Proposed measures are likely to increase capacity on the M2, the M20, the A2, the A20 and A21. The LTP will also deliver enhancements on the local road network including in the vicinity of the sites either already allocated or proposed for allocation. It will also promote greater use of the rail network for freight and passengers. Together these measures are likely to reduce the potential for cumulative impacts on the M20 and potentially alleviate air quality impacts on the AQMA, although the balance of effects is not known and will depend on the extent to which modal shift will balance out increased capacity on the road network. Impacts on greenhouse gas emissions are therefore uncertain, although the aim is to support decarbonisation.

Relevant minerals sites: Chapel Farm (international haulage traffic management), Moat Farm and Stonecastle Quarry (A21 enhancement, A228-A264 corridor improvements), Hermitage Quarry extension (M2 J4 capacity and local development connections, M2 road capacity enhancement, international haulage traffic management, A229 and A249 trunking, A229 Blue Bell Hill, A228-A264 corridor improvements).

Local Plan Review 2021-2038, Maidstone Borough Council, March 2024

There is a local housing need for 1,157 dwellings per annum in Maidstone Borough, which equates to 19,669 dwellings over the proposed 2021-38 plan period for the Local Plan Review (LPR). At Invicta Barracks, 500 units are expected to come forward during the Local Plan 2017 period (2011- 2031), with the remaining 800 units coming forward over the period to 2038. The remainder will be delivered as windfall sites and at town centre opportunity sites.

The minimum floorspace required to meet need based on job growth forecasts is 119,250m² (gross) for employment uses over the period 2021-2038.



The plan will allocate floorspace to meet the forecast retail needs over the first 10 years of the plan period, to 2032 only. The total floorspace required is therefore 10,847m² to 2032.

The emphasis will be on increasing and developing skilled employment opportunities in the borough alongside developing learning opportunities, having regard to the roles of centres across the borough and existing and improved accessibility patterns:

- i) Principally within the Maidstone urban area, with a particular focus on the renewal of the town centre, including the Invicta Barracks strategic development location;
- ii) Within two new garden communities at Heathlands and Lidsing within and extending beyond the plan period;
- iii) With significant employment locations at the former Syngenta Works and Woodcut Farm;
- iv) To a lesser extent at the six rural service centres of Harrietsham, Headcorn, Lenham, Marden, Coxheath consistent with their range of services and role;
- v) Limited development at the four larger villages of East Farleigh, Eythorne Street (Hollingbourne), Sutton Valence and Yalding; and
- vi) To support the sustainable future of smaller villages and hamlets where appropriate.

The Council will seek to ensure that key infrastructure and service improvements needed to support delivery of the Maidstone Borough LPR are brought forward in a coordinated and timely manner. The infrastructure will support the growth projected by the Local Plan and LPR by 2038 with a focus on large scale developments, such as proposals at the new garden communities at Heathlands and Lidsing.

Developments within the borough's AQMA, and with the potential to adversely impact it will be required to mitigate their impact, including on human health, having regard to both on-site design and travel patterns and modes of travel.

Maidstone's urban area will be revitalised by the regeneration of key commercial and residential sites and areas of existing deprivation, the creation of employment opportunities, continued investment in the town centre and improvements to access. The town centre will be regenerated by encouraging a wide range of new development including shops, businesses, residential development, cultural and tourism facilities, and enhanced public spaces that will attract residents and visitors.



Delivery of Woodcut Farm, 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 2038. The site will make a substantial contribution to the need for new office space in the borough as well as providing a new, well serviced and well connected mixed use employment site suitable for offices, industry and warehousing; thereby helping to diversify the range of sites available to new and expanding businesses in the borough. Redevelopment of the former Syngenta Works site near Yalding will make a significant contribution to the provision of employment uses, as will the continued build-out of the Kent Medical Campus/Newnham Park site. A number of smaller sites for employment use are allocated around the borough to accommodate a diverse range of employment types.

In addition to development, redevelopment and infilling of appropriate sites in accordance with other policies in the Plan, approximately 1,157 new dwellings will be delivered on three sites allocated in the Local Plan 2017 (policies H1(2) to H1(4)), including one at Oakapple Lane, Barming and East of Hermitage Lane, Maidstone. The existing 20/20 sites at Allington and Hermitage Mills are designated Economic Development Areas in order to maintain employment opportunities (policy LPRSP11(A)). Key infrastructure requirements for the north west strategic development location include: highway and transport infrastructure including improvements to: the M20 Junction 5 roundabout; junctions of Hermitage Lane/ London Road and Fountain Lane/ Tonbridge Road; pedestrian and cycle access; and public transport, including provision of a new bus loop in accordance with individual site criteria set out in policies H1(2) to H1(4); a new two form entry primary school, community centre and local shopping; facilities will be provided on site H1(2) to serve new development; new publicly accessible open space will be provided in accordance with policy LPRINF1 and existing OS1 policies; and improvements to health infrastructure including extensions and/or improvements at Barming Medical Practice, Blackthorn Medical Centre, Aylesford Medical Centre and Allington Park or Allington Clinic.

Heathlands Garden Community

A new Heathlands Garden Community will provide approximately 5,000 new homes, including 1,400 homes within the period 2029-37. This will become a new sustainably planned place with connected, walkable, vibrant, sociable neighbourhoods for the residents of Heathlands, Lenham, Lenham Heath and Charing in which to live and



work. There will be new local jobs, community facilities, schools, cafes shops and leisure facilities set in high quality public spaces creating an active and animated environment with enhanced biodiversity. To facilitate healthy lifestyles, high quality connected landscapes and green infrastructure will be provided for exercise, sport, play, walking, cycling, and leisure, sitting alongside facilities for growing food. Pedestrians, cyclists, and public transport will be priorities helping to establish sustainable travel opportunities with convenient and safe linkages within Heathlands, as well as to surrounding communities and to new community facilities. There will be a sensitive transition between the National Landscape and Heathlands, with a heathland landscape and strong planting in the northern parcels, and landscaped spaces for village greens, parks, commons and naturalistic green spaces throughout. A new rail station will be provided on the Maidstone-Ashford line, as well as two new access connections on to the A20. There will be a new District Centre adjacent to a potential new railway station, including a significant knowledge-based employment offer; two new Local Centres, one as part of the early phases of development, and one as part of later phase, each including an element of employment space; and a minimum of 14 hectares of dedicated new employment land.

Infrastructure requirements include the delivery of an improved or new wastewater treatment facility;

The following requirements are identified for transport connections:

- i) A new rail station will continue be provided on the Maidstone-Ashford rail line,;
- ii) Two new access connections on to the A20 will be provided to the north of the development, forming routes which cross the Maidstone-Ashford rail line to connect with the southern part of the site.
- iii) A highly accessible public transport facility through the site with new bus routes that provide linkages to the new station or existing Lenham Station and between the homes, district and local centres, Lenham secondary school, new schools and other local facilities and adjacent local areas;
- iv) A network of pedestrian and cycle paths throughout the site, linking the district centre and local centres to the housing and employment areas, and beyond to the open countryside and to surrounding settlements including improved access to off-site public rights of way.

The western portion of the site is constrained due to an existing minerals allocation and the existing Lenham Wastewater Treatment facility, and these constraints will be



addressed through phasing and masterplanning with the need for phasing to ensure that the minerals allocation is not compromised.

Lidsing Garden Community

The Lidsing Garden Community proposal provides a large, deliverable development that could come forward from the middle years of the LPR period containing 2000 homes. The site will operate as an urban extension to the Medway urban area, but designed to garden settlement standards. The site contains the opportunity for a significant employment offer as part of the development mix, and the council considers that this is appropriate given the strategic access granted to the M2 via Junction 4. Additionally there is potential to add a new arm to the M2 Junction 4 roundabout which aims to improve how that junction functions, as well as providing a new direct access to the motorway network from North Danes Way. Routes across the site will be significantly improved and a new orbital bus route will benefit the wider community. A new Local centre of not less than 1,500m² of retail, leisure and services will be created and 14 Ha of new employment space will be created, focused on the improved motorway access. A new connection to the M2 at Junction 4 will be created, enabling improved connections across the Capstone Valley and into Medway. A new bus service linking Lordswood, Hempstead and the Medway town centres and serving Boxley and Bredhurst. New half-hourly bus services to be provided between the site and Chatham via North Dane Way. Cycling & walking links throughout the site, and strategically north-south along the Capstone Valley and into the wider Medway area will be created.

Lenham

Approximately 145 new dwellings will be delivered on one allocated site (Tanyard Farm), in addition to six allocations in the Lenham Neighbourhood Plan which will deliver around 1,000 new dwellings.

Two pitches are allocated for Gypsy and Traveller accommodation.

Three existing sites are designated as Economic Development Areas in order to safeguard and maintain employment opportunities in the locality.

One new employment site allocation (Ashford Road) will deliver up to 2,500m² employment space.



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.

Harrietsham

Approximately 100 new dwellings will be delivered at Kielen Manor and land south of A20.

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 the A20 Ashford Road, improvements to Church Road and the provision of additional pedestrian crossing points.

The Plan notes the presence of Mineral Safeguarding Areas and states that development proposals coming forward within those areas will need to comply with minerals safeguarding policies in the KMWLP. The Plan identifies Mineral Safeguarding Areas relevant to 10 proposed development sites, including Heathlands Garden Settlement.

Contribution to Cumulative Effects

Housing and economic development in Maidstone and at junction 8 of the M20 and at Heathlands Garden Community and to a lesser extent at Lenham and Harrietsham will provide housing, employment and services to meet the needs of communities, contributing to their wellbeing. It is likely to increase traffic on the A20, M20 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. Improvements to junction 5 of the M20 and the junction of Hermitage Lane and London Road will improve flow through these junctions. The development of new sites for housing and employment is likely to increase pressures on biodiversity. Greenhouse gas emissions would be increased. Housing development allocations at Oakapple Lane, Barming and East of Hermitage Lane, Maidstone for 687 dwellings would increase traffic on Hermitage Lane.



Relevant mineral site: M3, Hermitage Quarry.

Lenham Neighbourhood Plan 2017-31, Lenham Parish Council, July 2021

Allocates seven potential development sites to accommodate housing in the Lenham area, to the north east and north west of the Chapel Farm mineral site.

Contribution to Cumulative Effects

Proposed housing development at Lenham will help to address the needs of communities, contributing to their wellbeing. It will increase traffic on the A20, potentially in competition with the traffic accessing the minerals site. The likelihood of impacts is unclear as the locations are currently only proposals.

Relevant mineral site: M3

Adopted Local Plan, Ashford Borough Council, February 2019

A total housing target of 13,118 net additional dwellings applies for the Borough between 2018 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 4,872 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 63 hectares of new employment land and a total of 11,100 jobs in the Borough between 2014-30.

A regenerated Ashford Town Centre will significantly expand 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.

Land adjacent to Poppyfields at Charing is proposed for residential development, up to 180 dwellings. This should be accessed directly from the A20.

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.

The Plan notes that the site at Brockman's Lane lies within a Mineral Safeguarding area and requires a mineral assessment to be undertaken to establish whether any prior extraction is required.

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.



Relevant minerals site: M3

Core Strategy, Tonbridge and Malling Borough Council, September 2007

Provision is made for the development of at least 6,375 dwellings in the period 2006-2021. Development will be concentrated within the confines of the urban areas of:

- i) Tonbridge (including Hilden Park);
- ii) The Medway Gap (i.e. the major developed parts of Kings Hill, Leybourne, East Malling, Larkfield, Lunsford Park, Ditton and Aylesford south of the River Medway, Aylesford Forstal, and Snodland);
- iii) The part of the Medway Towns urban area that lies within Tonbridge and Malling Borough (Walderslade).

Development adjoining these urban areas will only be proposed in the LDF, or otherwise permitted, where there is an identified need and there are no suitable sites within the urban areas. Priority will be afforded to the use of previously developed land.

Housing and employment development or redevelopment, conversions and changes of use will be proposed or otherwise permitted within the confines of the following rural settlements which are defined as Rural Service Centres: Borough Green; Hildenborough; East Peckham; West Malling; Hadlow.

Major new housing development will be met at following strategic sites:

- i) Holborough (with permission) – 938 dwellings to be developed between 2006 and 2016;
- ii) Kings Hill (with permission) –1446 dwellings to be developed between 2006 and 2016;
- iii) Leybourne Grange (with permission) – 723 dwellings to be developed between 2008 to 2016;
- iv) Peters Pit (with permission) - 1000 dwellings to be developed mainly in the post 2011 period.

New employment provision will be met at Kings Hill and on vacant sites within the main employment areas as well as through the intensification or redevelopment of existing employment sites.



Contribution to Cumulative Effects

The proposed housing and employment growth within Tonbridge and Malling 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. This is particularly the case with the strategic sites at Holborough, Kings Hill, Leybourne Grange and Peters Pit. Proposed developments in the Medway Gap and at Snodland are likely to increase demand for road space, including on the A20 and M20. This could potentially be in competition for road space with minerals site traffic. 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 site: Hermitage Quarry extension

Local Plan, Tunbridge Wells Borough Council, December 2025

The broad development strategy for Tunbridge Wells borough over the period 2020-2038 is to ensure that a minimum of 12,204 dwellings and 14 hectares of employment (Use Classes B and E) land are developed, together with supporting infrastructure and services.

The Plan provides for the growth of settlements, having regard to their role and function, constraints and opportunities, together with the major, transformational expansion of Paddock Wood (including land at east Capel) following garden settlement principles and providing flood risk solutions.

The Plan also provides for a prestigious new business park to the north of North Farm/Kingstanding Way, Royal Tunbridge Wells, well connected to the improved A21.

The majority of housing growth is located as follows:

- i) Royal Tunbridge Wells: 1278 to 1421 dwellings
- ii) Paddock Wood: 1820 to 1912 dwellings
- iii) Paddock Wood and land east of Capel strategic urban expansion (STR/SS 1): 2374 to 2532 dwellings
- iv) Capel (as part of STR/SS 1): 997 to 1063 dwellings



- v) Cranbrook and Sissinghurst: 453 to 467 dwellings
- vi) Cranbrook: 415 to 429 dwellings
- vii) Pembury: 371 to 399 dwellings

Four employment land allocations are identified, including:

- i) 13.4 ha in Royal Tunbridge Wells
- ii) 4.27 ha at Paddock Wood
- iii) 4.25 ha at Paddock Wood

There is a package of significant transport measures to support the growth at the Strategic Site at Paddock Wood (including land at east Capel), including new road junctions/links, bus links and services and active travel provision (including towards Royal Tunbridge Wells and Tonbridge). There is a further package of measures for Royal Tunbridge Wells and Pembury, including improvements to road junctions/links, bus priority measures, and upgraded and new cycle routes and pedestrian links.

The Council will work with Kent County Council and National Highways to oversee the delivery of strategic and local highway improvements to mitigate and address the impact on the highway network. These measures will be funded by development, although other funding opportunities will be investigated. Mitigation measures include:

- i) part off-line, part on-line Colts Hill Bypass and associated improvements at Badsell Road Roundabout (A228);
- ii) Somerhill Roundabout improvements;
- iii) Traffic management improvements at Five Oak Green village
- iv) Hop Farm Roundabout improvements;
- v) measures along the A228/A264, including junction capacity improvements at Woodsgate Corner and a appropriate junction at the Pembury Road/Halls Hole Road/Blackhurst Lane.

The routes for major and strategic road improvements, including a safeguarded route for an entirely off-line A228 strategic link (Colts Hill bypass) as part of the wider major roads network (to deliver wider economic benefits and links to north east Kent (and potentially the Lower Thames Crossing), and the dualling of the A21 from Kippings Cross to Lamberhurst will be safeguarded.



The Plan notes the need for development proposals in Mineral Safeguarding Areas to comply with the safeguarding policies in the KMWLP. It notes potential mineral constraints at Paddock Wood and Tunbridge Wells Garden Centre.

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, although this may be offset to some degree by measures to encourage sustainable transport use and air quality improvements.

Proposed developments at Paddock Wood have the potential to give rise to impacts on the A228 in combination with mineral sites M10 and M13, although planned improvements to the A228 may help to accommodate the increase in traffic using the road such that adverse impacts on the network are avoided.

Relevant site: M10 Moat Farm, M13 Stonecastle Farm Quarry extension

The London Plan 2021, London Assembly, March 2021

In order to manage London's waste sustainably:

- i) the equivalent of 100 per cent of London's waste should be managed within London (i.e. net self-sufficiency) by 2026
- ii) existing waste management sites should be safeguarded (see Policy SI 9 Safeguarded waste sites)
- iii) the waste management capacity of existing sites should be optimised
- iv) new waste management sites should be provided where required
- v) environmental, social and economic benefits from waste and secondary materials management should be created.

Development Plans should:

- i) plan for identified waste needs
- ii) identify how waste will be reduced, in line with the principles of the Circular Economy and how the remaining quantum of waste will be managed
- iii) allocate sufficient sites, identify suitable areas, and identify waste management facilities to provide the capacity to manage the apportioned tonnages of waste.



An adequate supply of aggregates to support construction in London will be achieved by:

- i) encouraging re-use and recycling of construction, demolition and excavation waste within London, including on-site
- ii) extracting land-won aggregates within London
- iii) importing aggregates to London by sustainable transport modes.

Most aggregates used in the capital come from outside London, including marine sand and gravel and land-won aggregates, principally crushed rock from other regions.

Contribution to Cumulative Effects

The London Plan identifies that most aggregates used in the capital come from outside London, including marine sand and gravel which may come through wharves in Kent. The London Plan requires Boroughs to safeguard existing and future wharf capacity and railheads within London, which will help to reduce the potential for additional pressure on Kent's wharves and road network.

Cumulative impacts in combination with the new site proposed for allocation on Land South and West of Hermitage Quarry and existing sites allocated in the MSP are not likely.



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Sustainability Appraisal Report Non-Technical Summary

Updates to Mineral Sites Plan

Regulation 19 Consultation

Prepared for



Kent County Council

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1.0 EXECUTIVE SUMMARY

- 1.1.1 Axis has been commissioned to undertake a Sustainability Appraisal (SA) in support of the preparation of an update to the Kent Mineral Sites Plan (MSP). This report presents the interim outcomes of this process up to the Regulation 19 stage. The draft update to the MSP considers a new site proposed for allocation in the MSP for hard rock, alongside the three already allocated sites for soft sand and sharp sand and gravel which it is proposed be retained in the updated MSP. The new site is Land South and West of Hermitage Quarry, adjacent to the existing quarry.
- 1.1.2 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 challenges. 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 2.1** of the report. The new site proposed for allocation on Land South and West of Hermitage Quarry and the existing sites allocated in the MSP as a whole have been appraised against this set of sustainability objectives. For the new site proposed for allocation, the findings are set out below, while the findings for the MSP as a whole are set out in the main report which follows this summary.
- 1.1.3 Allocation of Land South and West of Hermitage Quarry would ensure the continued local supply of hard rock as a material to support economic growth, in particular via its use as a construction aggregate. It would provide support for local jobs within the mineral industry and help to avoid increased transport costs for hard rock. It would ensure the continued availability of Kentish ragstone for use in building restoration projects, which has qualities difficult to find in stone from elsewhere.
- 1.1.4 There are some residential dwellings in proximity to the site proposed for allocation and there is the potential for impacts on these nearby residential areas from dust, noise, blasting, visual intrusion and light. Proposed development criteria require appropriate mitigation of impacts in accordance with KMWLP Policy DM 11 Health and Amenity.
- 1.1.5 The southern part of the site is designated as ancient woodland in the form of a Plantation on Ancient Woodland Sites (a sweet chestnut coppice) which would be lost to development, potentially fragmenting the remaining woodland. Ancient



woodland is deemed irreplaceable habitat¹ legally requiring a compensation plan. The ancient woodland soil has biodiversity value and is proposed for translocation as part of the compensation plan. Part of Oaken Wood Local Wildlife Site (LWS) would be lost to development, also potentially fragmenting remaining parts of the woodland. Plans are to restore the site to deciduous native woodland to achieve a net gain in biodiversity. Conditions should be imposed on development so that worked areas are restored soon after completion and without avoidable delay. The agricultural land in the northern part of the site is grade 2 (very good). The soil from this area would be required to be stripped, stockpiled and used for restoration. Any planning application is required to be accompanied by a Soil Resource Plan as per government guidance.

- 1.1.6 Public Right of Way (PROW) path MR108 crosses the site and there are several permissive tracks through Oaken Wood which may be used for recreation by walkers and riders. The PROW would be subject to diversions which, in accordance with KMWLP policy, must preserve the connectivity of routes and made safe for all users. The permissive tracks would also be diverted for the benefit of users.
- 1.1.7 An area Tree Preservation Order covers land to the north of the proposed site, the majority of which has already been lost to extraction. A strip of land along the southern and western borders of the TPO with remaining trees is covered by the proposed working area, therefore trees covered by the TPO would be lost. This would be an adverse impact on amenity in the short to medium term, but restoration to native woodland would reverse this loss in the long term
- 1.1.8 The site is 3.9km from the Kent Downs National Landscape and there will be no significant visual impacts provided the site is worked sequentially with the existing operations. The Maidstone Landscape Character Assessment identifies Oaken Wood as a particular landscape and, although workings from extraction could be screened, this will not be a minor change and will not preserve the continuity of the feature, therefore adverse impacts are likely. It would be difficult to avoid significant impacts on KCC Character Area Mereworth Woodlands, but a well-considered restoration scheme could theoretically result in new native woodland over a period of years post-extraction, restoring the character of the area to some degree.

¹ Defined by The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024



- 1.1.9 The 2022 planning permission amending vehicle numbers for the existing quarry states that there should be a daily maximum combined total of 800 HGV movements a day within a single calendar month, and no higher than 900 on any one day. Proposed development management criteria require HGV levels not to exceed those at the existing site unless it is demonstrated that this will not give rise to unacceptable adverse impacts, therefore impacts on the nearby AQMAs, the local road network and on greenhouse gas emissions are unlikely to increase.
- 1.1.10 There are listed buildings in proximity to the site. While it is possible that extraction at the site could have adverse impacts on one or more of these listed buildings, the separation distances would suggest that any impacts would be minor and proposed development management criteria require mitigation of unacceptable adverse impacts, in accordance with KMWLP policy. There is some potential for palaeolithic interest on the site and any planning application is required to be accompanied by an assessment of the archaeological value of the site and a proposed plan for preserving remains in situ where possible or removing and conserving remains offsite.
- 1.1.11 The site is underlain by principal and secondary bedrock and superficial aquifers. It is classed as having medium and medium-high groundwater vulnerability in the north of the site and high groundwater vulnerability in the south and east of the site and lies within a Source Protection Zone 3. There is the potential for impacts on water, although proposed development management criteria require demonstration that development would not give rise to unacceptable adverse impacts on the water environment, therefore adverse impacts are unlikely.
- 1.1.12 The SA has made a number of recommendations for measures to prevent, reduce and as fully as possible offset any significant adverse effects of an updated MSP that included the new site proposed for allocation on Land South and West of Hermitage Quarry.
- 1.1.13 The SA is required to appraise reasonable alternatives to an updated MSP that included the new site proposed for allocation. No other site for the extraction of hard rock was nominated during the initial Call for Sites undertaken in 2022 and the subsequent second Call for Sites which took place between August and October 2023. Although an assessment has been made of potential sites within Kent, no suitable sites were identified.



- 1.1.14 An alternative to allocating the site on Land South and West of Hermitage Quarry could be to rely instead on imports of hard rock from outside of the county. Importation of hard rock to meet local needs will increase the need for the transport of mineral and associated emissions to air. There is a greater likelihood of negative impacts on air quality and climate change, and negative impacts may be caused on congestion, noise and disturbance, depending on route and distance. The total distance transported is likely to lead to higher emissions overall. Importation of hard rock is also likely to have adverse economic impacts from increased transport costs and loss of jobs within Kent. Kentish ragstone would not be available for use in heritage restoration projects, therefore adverse impacts on the built historic environment are likely.



2.0 NON-TECHNICAL SUMMARY

2.1 Background

- 2.1.1 Axis has been commissioned to undertake a Sustainability Appraisal (SA) in support of the updates being made to the adopted Kent Mineral Sites Plan (MSP). This report presents the outcomes of this process up to Regulation 19 stage. SA is a mechanism for considering and communicating the likely effects of a draft plan, and reasonable alternatives, with a view to avoiding and mitigating adverse effects and maximising positives.

2.2 What is the Plan seeking to achieve?

- 2.2.1 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. Three sites are currently allocated within the adopted MSP for soft sand and sharp sand and gravel.
- 2.2.2 The main objective of the MSP is to ensure that Kent has enough permitted aggregate mineral reserves over the plan period (until 2039) and beyond to meet plan making requirements, which are maintaining a landbank of 7 years for sand and gravel and maintaining a landbank of 10 years for hard (crushed) rock.
- 2.2.3 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 which have since been removed from the KMWLP. The KMWLP identified that the specific sites for minerals developments would be set out in the separate MSP.
- 2.2.4 In 2021, KCC completed a five year review of the KMWLP. This identified the need for updates to the KMWLP including a change to the timeframe covered by the KMWLP, from 2024 to 2039 (previously 2013-30). It became clear that, with this extended timeframe, there are not sufficient permitted reserves in the adopted Mineral Sites Plan to maintain a 10 year landbank for hard rock, as required by national policy, and there is therefore a need to identify new suitable reserves of hard rock in the form of one or more additional site allocations in the Mineral Sites Plan. A Call for Sites was therefore undertaken in October 2022, which resulted in the following additional site being nominated by the site promoter for inclusion in the



MSP - Land to the South and West of Hermitage Quarry. A second Call for Sites took place between August and October 2023, but this did not result in the nomination of any further sites.

2.3 What's the situation now (sustainability baseline)?

2.3.1 The following is a summary of the sustainability baseline characteristics in Kent.

2.3.2 Environmental baseline:

- i) After a gradual rise in the amount of residual waste collected per person in Kent, it has fallen recent years, from 426.4 kg in 2021/22 to 406.5 kg in 2023/24. Less than half (39%) of household waste was reused, recycled or composted in 2022/23 and less than 1% is landfilled. Most of the remainder is incinerated with energy recovery.
- ii) Some 6.58 million tonnes of waste of all kinds (the majority being construction and demolition waste) were reported as being managed at Kent waste management facilities in 2022. This compares with around 1.49 million tonnes of Kent waste managed outside the county. However, this export is more than offset by imports, so taking a simple balance, Kent remains net self-sufficient.
- iii) Construction aggregates (sand, gravel and ragstone) are the main types of economically important minerals extracted in Kent at this time, although brickearth, clay and chalk (for engineering and agricultural lime applications) are also extracted. This is supplemented with imports and recycled aggregates. There is a predicted shortfall of available reserves of hard rock at the maintained 'at least' 10-year level for, and at the end of, the Plan period (2024- 2039).
- iv) 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 9.8% of the county. The county contains c.11% of England's ancient woodland, the largest amount in England.
- v) The Thames Gateway is also acknowledged for its national importance due to 'brownfield' biodiversity.
- vi) 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 built-development or intensive farming, which has reduced and fragmented populations; and the effects of climate change.



- vii) Kent is considered to be the most at risk 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.
- viii) Since 2006 there has been a steady reduction in carbon dioxide emissions, to 3.9 tonnes per capita in 2023. This is slightly lower than UK emission levels of 4.1 tonnes per capita.
- ix) The annual report of the Kent and Medway Air Quality Partnership reports that NO₂ concentrations remain below pre COVID-19 pandemic levels, PM₁₀ and PM_{2.5} concentrations are above the UK average but showing a general decreasing trend, and SO₂ levels closely follow the overall decreasing UK trend.
- x) Kent has the highest number of listed buildings in the South East, and is third highest of all counties in England behind only Devon and Greater London.
- xi) The Kent Downs National Landscape covers nearly a quarter of the County, whilst the High Weald National Landscape is shared with East Sussex.
- xii) Green Belt comprises the majority of Sevenoaks, Tonbridge and Malling and Gravesham Districts, as well as a proportion of Tunbridge Wells and Dartford Boroughs and a small part of Maidstone Borough.
- xiii) There are relatively extensive areas of excellent (grade one) agricultural land in Kent. This land tends to be concentrated in the north of the county, running in a band from Gillingham in the west through to Deal in the east. Pockets can also be found in the area surrounding New Romney, to the west of Maidstone and north east of Ashford. Good or very good quality agricultural land can be found in many parts of Kent.
- xiv) Road traffic has grown fairly steadily over the years, apart from 2020 when COVID-19 particularly affected car traffic. The effect on LGVs and HGVs was less marked, although still showed a decrease. Kent is a major gateway for the movement of international freight through the Channel Tunnel, the ports of Dover, Ramsgate and Sheerness. Road haulage is the dominant means of transport in this sector.
- xv) Pressures on water availability 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. Water stress poses long term risk to housing development, economic growth, tourism and everyday water access for residents. It also threatens the county's rich natural



habitats and biodiversity. The majority of catchments within Kent in 2022 were of moderate ecological status, largely similar to the status in 2019.

2.3.3 Social baseline:

- i) Kent will have an estimated population of 1,653,893 in mid-2026. By 2039, the population of Kent is projected to increase to 1,778,618, an increase of c. 7.5%.
- ii) Significant areas within Kent are amongst England's most deprived 30% of local authorities, measured by the Indices of Multiple Deprivation.
- iii) Life expectancy is 9 years lower for men and 7 years lower for women in the most deprived populations in Kent compared to the least deprived populations.
- iv) Mortality rates from cancer and cardiovascular disease have fallen and are better than the England average. Nearly a quarter (23%) of children aged 4-5 are classified as being obese, higher than the average for England (22%). However, estimated levels of adult obesity in Kent (25.6%) are lower than the England average (26.5%) but increasing (an increase of 2.5% since 2016).
- v) Climate change projections highlight an increase in risk to people from flooding and hotter, drier summers leading to public health risks.

2.3.4 Economic baseline:

- i) In 2022, the gross disposable household income in Kent was £24,341 per head, 4.3% above the national average.
- ii) Between 2021 and 2025, the number of active enterprises shrank by 1%, to 68,910, which slightly better than the national average which shrank by 4%.
- iii) The overall employment rate in Kent has risen since the KMWLP was adopted, from 73.8% in 2016 to 75.7% in 2025.
- iv) Apart from slight declines in 2008-2009 and 2022, GVA per head in Kent and Medway has risen steadily in the 21st century. In 2025 it was £29,379 per head, up from £14,029 in 2000, a rise of 109%. However, per capita GVA is lower than for the South East as a whole and for England.
- v) The largest sector for employment in 2024 was wholesale and retail trade at 16.2%, followed by human health and social work at 13.9% and education at 9.4%. The distribution sector generated the highest gross value added in Kent in 2023, a fifth of the total.



2.4 How would the baseline change without an MSP updated to include the new site proposed for allocation?

- 2.4.1 There is a degree of uncertainty about how the baseline might change without the adoption of an MSP updated to include the new site proposed for allocation on Land South and West of Hermitage Quarry. Proposals for development of new mineral sites could still come forward and these will be required to comply with the policies of the KMWLP. This includes development management 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.
- 2.4.2 However, without an MSP updated to include the new site proposed for allocation there will be less certainty that Kent would be able to provide enough hard rock to support the expected future demand for minerals from construction and industry, particularly for the restoration of historic buildings. 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 may have adverse effects on transport networks and air quality and may be difficult to blend in with existing Kentish ragstone used in buildings within the county and beyond. It is unlikely that secondary and recycled aggregates or marine dredged aggregates would meet the specification required.
- 2.4.3 Without an MSP updated to include the new site proposed for allocation, imports from other parts of the country may be required. This could lead to increased carbon dioxide emissions from mineral transport and associated risks to people and communities.
- 2.4.4 The social baseline is unlikely to be significantly affected without the adoption of an MSP updated to include the new site proposed for allocation. Population, levels of deprivation and health are unlikely to be significantly different with or without an MSP updated to include the new site proposed for allocation, although jobs will be lost at the existing operational quarry when the permitted resource is exhausted.

2.5 Characteristics of Areas Likely to be Significantly Affected

- 2.5.1 Areas likely to be affected are in the vicinity of each of the sites either already allocated or proposed for allocation. The characteristics of the four sites are described in the following paragraphs.



- 2.5.2 The proposed extension to Hermitage Quarry is on land designated as either grade 2 agricultural land (very good) or ancient replanted woodland. Some of the land is also designated as a Local Wildlife Site, some contains biodiversity priority habitats and some has local landscape significance. It is underlain by aquifers and has groundwater vulnerability, but low flood risk. There are a number of residential dwellings in proximity to the site and several listed buildings, and there may be below-ground palaeolithic interest. There is a Public Right of Way that crosses the site, and it is adjacent to a SSSI of geomorphological importance. Two AQMAs are fairly close to the site, one adjacent to the existing quarry and one on main roads passing through the Borough including the M20.
- 2.5.3 Site M3 (Chapel Farm) is a previously unworked site rather than an extension to an existing site, situated in countryside to the south east of Lenham between junctions 8 and 9 of the M20. The site is an area of open landscape rising from Lenham Heath Road towards the A20 and is within the setting of the Kent Downs National Landscape. The site is grade 2 agricultural land and is adjacent to ancient woodland, priority habitats with notable species, and three Local Wildlife Sites. Footpaths cross the site. There are a small number of residential dwellings and listed buildings in proximity to the site. The site overlies an aquifer and is partly in a Source Protection Zone 3 for a public water abstraction borehole. It also overlies a length of the River Stour. Sewerage infrastructure crosses the site, and a wastewater treatment works is adjacent. Any planning application must be accompanied by adequate proposals to show the sewerage infrastructure will not be adversely affected.
- 2.5.4 Site M10 (Moat Farm) is an extension to existing operations situated in countryside to the north of Five Oak Green near Tonbridge and the River Medway. It is predominantly arable fields (predominantly grade 3b) surrounded by hedgerows and ditches, potentially with notable species and with an area of ancient woodland to the north of the site. Footpaths cross the site and there is a residential property near the site. It is located in Green Belt and an area of flood risk. The site overlies an aquifer and lies partially within a groundwater source protection zone. The Alder Stream and smaller ditches run through the site.
- 2.5.5 Site M13 (Stonecastle Farm Quarry Extension) is in countryside to the north west of Five Oak Green near Tonbridge, adjacent to the River Medway. It is a large arable field (predominantly grade 3b) with hedgerows within and surrounding the site, adjacent to a Local Wildlife Site and ancient woodland. There are areas of



biodiversity priority habitat within and adjacent to the site which have the potential to contain notable species. A public right of way runs near to the site. The site is within the Green Belt and an area of flood risk and extends into groundwater source protection zones. There is a listed building near to the site access, and a low potential for archaeological or other historic remains onsite.

2.6 Areas of Particular Environmental Importance

2.6.1 Kent contains a number of designated sites of international nature conservation importance. In addition, there are further designated sites outside Kent but within 10km of the county boundary. These sites are listed in the SA Scoping Report. There are two designated sites that are within 10km of the proposed additional mineral site:

- i) North Downs Woodland SAC at 6.2km
- ii) Peters Pit SAC at 6.5km

2.6.2 The importance of each of these sites is described in **Section 4.7**.

2.7 SA Framework and Sustainability Objectives

2.7.1 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 (see **Sections 4.2** and **4.3**). 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 2.1**. The framework was published for consultation in the SA Scoping Report and **Table 2.1** below also incorporates three additional detailed criteria (in italics) following a refresh of baseline data and policy documents following the draft updated MSP Regulation 18 consultation.

Table 2.1 – SA Framework

Sustainability Objectives	Detailed Considerations
1. Biodiversity	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 i) Add to the biodiversity baseline by creating opportunities for targeted habitat creation (which, ideally, contributes to local or landscape scale habitat networks). ii) Avoid hindering plans for biodiversity conservation or enhancement iii) Support increased access to biodiversity iv) Provide a net gain in biodiversity value



	v) <i>Compensate for the loss of irreplaceable habitat</i>
2. Climate change	Address the causes of climate change through reducing emissions of greenhouse gases through energy efficiency and energy generated from renewable sources i) Promote sustainable design and construction of facilities and support wider efforts to reduce the carbon footprint of minerals and waste operations. ii) Promote climate change adaptation
3. Community and well-being	Support efforts to create and sustain sustainable communities, 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 Multiple deprivation. ii) Help to tackle more hidden forms of deprivation and exclusion, such as that which is experienced in urban and coastal areas and particular socio-economic groups within communities. iii) Ensure that the necessary aggregates are available for building, and that the necessary waste infrastructure is in place to support housing and economic growth iv) Ensure that minerals and waste development does not contribute to poor air quality with particular reference to PM2.5 and NOx v) Protect and enhance public rights of way and access vi) Protect local green space vii) Avoid loss of tranquillity
4. Sustainable economic growth	Support economic growth and diversification i) Support the development of a dynamic, diverse and knowledge-based economy that excels in innovation with higher value, lower impact activities ii) Stimulate economic revival and targeted employment generation in deprived areas
5. Flood risk	Reduce the risk of flooding and the resulting detriment to public wellbeing, the economy and the environment i) Ensure that development does not lead to increased flood risk on or off site ii) Seek to mitigate or reduce flood risk through developments that are able to slow water flow and promote groundwater recharge
6. Land	Make efficient use of land and avoid sensitive locations i) Make best use of previously developed land ii) Avoid locations with sensitive geomorphology iii) Seek to safeguard the best and most versatile agricultural land and recognise its economic and other benefits iv) Prevent inappropriate development in the Green Belt v) <i>Restore land quality</i>
7. Landscape and the historic environment	Protect and enhance Kent's countryside and historic environment i) Protect <i>and enhance</i> the integrity of National Landscapes and their setting and other particularly valued or sensitive landscapes ii) Take account of the constraints, opportunities and priorities demonstrated through landscape characterisation assessments and other studies at the landscape scale. iii) Avoid light pollution iv) Protect important heritage assets and their settings, as well as take account of the value of the character of the wider historic environment
8. Transport	Reduce and minimise unsustainable transport patterns and facilitate the transport of minerals and waste by the most sustainable modes possible i) Minimise minerals and waste transport movements and journey lengths; and encourage transport by rail and water. ii) Ensure that minerals and waste transport does not impact on sensitive locations, including locations already experiencing congestion and locations where planned growth or regeneration is reliant on good transport networks.



9. Water	Maintain and improve the water quality of the Kent's rivers, ground waters and coasts, and achieve sustainable water resources management i) Ensure that minerals and waste development seeks to promote the conservation of water resources wherever possible with particular reference to abstraction. ii) Avoid pollution of ground or surface waters, particularly in areas identified as being at risk or sensitive iii) <i>Promote sustainable drainage management</i>
10. Waste	Ensure the sustainable management of waste i) Manage waste in accordance with the waste hierarchy ii) Prevent adverse effects from waste on human health and the environment iii) Ensure waste is managed as near as possible to its place of production

2.8 Likely Significant Effects of an Updated MSP

2.8.1 The SA has appraised the new site proposed for allocation on Land South and West of Hermitage Quarry for the likely impacts on sustainable development policy objectives. It has also reviewed and updated the appraisal of existing allocated sites in the adopted MSP. The methodology and assumptions used in undertaking the appraisal are set out in **Section 6**. The detailed findings of the SA of all the sites are set out in **Appendix C**. These are summarised below for the new site proposed for allocation at Hermitage Quarry and for the MSP as a whole updated to include the new proposed site.

Land South and West of Hermitage Quarry

2.8.2 Allocation of Land South and West of Hermitage Quarry would ensure the continued local supply of hard rock as a material to support economic growth, in particular via its use as a construction aggregate. It would provide support for local jobs within the mineral industry and help to avoid increased transport costs for hard rock. It would ensure the availability of Kentish ragstone for use in building restoration projects, which has qualities difficult to find in stone from elsewhere.

2.8.3 There are residential dwellings in proximity to the site proposed for allocation to the south and west of Hermitage Quarry and there is the potential for impacts on these dwellings from dust, noise, blasting, visual intrusion, light and loss of open space. Proposed development criteria require appropriate mitigation of impacts in accordance with KMWLP Policy DM 11 Health and Amenity.

2.8.4 The southern part of the site is designated as Plantation on Ancient Woodland Sites, which would be lost to development, potentially fragmenting the remaining woodland.



Ancient woodland is deemed irreplaceable habitat² legally requiring a compensation plan and proposed development management criteria include compensation measures. The ancient woodland soil has biodiversity value. Part of Oaken Wood Local Wildlife Site (LWS) would be lost to development, also potentially fragmenting remaining parts of the woodland. Plans are to restore the site to deciduous native woodland and meadow to achieve a net gain in biodiversity. Worked areas should be required to be restored soon after completion and without avoidable delay. The agricultural land in the northern part of the site is grade 2 (very good). The soil from this area would be required to be stripped, stockpiled and used for restoration. Any planning application is required to be accompanied by a Soil Resource Plan as per government guidance³.

- 2.8.5 Public Right of Way path MR108 crosses the site and there are several permissive tracks through Oaken Wood which may be used for recreation by walkers and riders. The Public Right of Way would be subject to diversions which, in accordance with KMWLP policy, must preserve the connectivity of routes and made safe for all users. In addition, the draft Landscape Strategy⁴ proposes the creation of additional paths and therefore there are likely to be long-term benefits.
- 2.8.6 An area Tree Preservation Order covers land to the north of the proposed site, the majority of which has already been lost to extraction. A strip of land along the southern and western borders of the TPO with remaining trees is covered by the proposed working area, therefore trees covered by the TPO would be lost. This would be an adverse impact in the short to medium term, but restoration to native woodland would reverse this loss in the long term.
- 2.8.7 The site is 3.9km from the Kent Downs National Landscape and it is likely that there will be no significant visual impacts provided the site is worked sequentially with the existing operations. The Maidstone Landscape Character Assessment identifies Oaken Wood as a particular landscape and, although workings from extraction could be screened, this will not be a minor change and will not preserve the continuity of the feature, therefore adverse impacts are likely. Significant impacts are likely on

² Defined by *The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024*

³ *Construction Code of Practice for the Sustainable Use of Soils on Construction Sites*, Defra, September 2009

⁴ *Land South and West of Hermitage Quarry: Proposed Landscape Strategy 2024 Draft*, Hill-Wood and Co (Kent) Ltd, 2024



the KCC Character Area Mereworth Woodlands, but could be restored to some degree through restoration.

- 2.8.8 The 2022 planning permission amending vehicle movement numbers for the existing operations states that there should be a daily maximum combined total of 800 HGV movements a day within a single calendar month, and no higher than 900 on any one day. Proposed development management criteria require HGV levels not to exceed those at the existing site unless it is demonstrated that this will not give rise to unacceptable adverse impacts, therefore impacts on the nearby AQMAs, the local road network and on greenhouse gas emissions are unlikely to increase.
- 2.8.9 There are listed buildings in proximity to the site. While it is possible that extraction at the site could have adverse impacts on one or more of these listed buildings, the separation distances would suggest that any impacts would be minor and proposed development management criteria require mitigation of adverse impacts, in accordance with KMWLP policy. There is some potential for palaeolithic interest on the site and any planning application is required to be accompanied by an assessment of the archaeological value of the site and a proposed plan for preserving remains in situ where possible or removing and conserving remains offsite.
- 2.8.10 The site is underlain by principal and secondary bedrock and superficial aquifers. It is classed as having medium and medium-high groundwater vulnerability in the north of the site and high groundwater vulnerability in the south and east of the site and lies within a Source Protection Zone 3. There is the potential for impacts on water, although proposed development management criteria should ensure that unacceptable adverse impacts are avoided.
- 2.8.11 The SA has made a number of recommendations for measures to prevent, reduce and, as fully as possible, offset any significant adverse effects of an MSP updated to include the new site proposed for allocation.

Impacts of an MSP Updated to Include the New Site Proposed for allocation on Land South and West of Hermitage Quarry

- 2.8.12 Each of the sites contain, or are adjacent to, some form of biodiversity asset or biodiversity value and impacts are possible in each case. Planning applications are required to fully assess the impacts on biodiversity, to provide mitigation to ensure



no unacceptable adverse impacts and to provide a net gain in biodiversity. Restoration proposals at three of the sites aim to restore the site to biodiversity habitat which will help to mitigate any potential loss.

- 2.8.13 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.
- 2.8.14 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 of footpaths and loss of tranquillity. However, development management criteria require mitigation to adequately minimise impacts from dust, noise, vibration, light and visual impacts and cumulative impacts are not likely to be significant.
- 2.8.15 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 and by supporting the retention of jobs in the mineral industry within Kent. By facilitating the extraction of primary aggregates, the Minerals Sites Plan is exploiting a non-renewable resource.
- 2.8.16 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.
- 2.8.17 Two of the mineral sites contain soil which is classed as the best and most versatile agricultural land, although restoration to agricultural land is proposed for one of these and therefore the impact on soil quality in the longer term is not likely to be significant for this site, subject to the implementation of a soil resources plan. 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, if they do, that very special circumstances exist to justify the approval of planning permission. Given that the sites will be restored to wetland habitat, lasting cumulative impacts on the Green Belt are not envisaged.
- 2.8.18 There is the potential for the sites to have some impacts on landscape and on the historic environment. However, it will be possible to provide mitigation such that the



significance of impacts is minimised in most instances. However, the new site proposed for allocation at Hermitage Quarry will have impacts on local landscape character that are unlikely to be mitigated. Adverse impacts on the National Landscapes are not likely to be significant.

2.8.19 Minerals sites generate vehicle movements accessing and leaving the sites. The majority of these are HGV movements and additionally staff vehicles will access the sites. For sites M10 and M13 and the new site proposed for allocation, 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 an MSP updated to include the new site proposed for allocation overall is not expected to be great given the predicted number of movements and the context of all traffic movements in the county. Because of the location of the existing sites allocated, and the new site proposed for allocation, it is unlikely that a Minerals Sites Plan that included these sites would 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.

2.8.20 Each of the currently allocated mineral sites have the potential for significant impacts on hydrology/hydrogeology and water quality. The site proposed for allocation at Hermitage Quarry is unlikely to affect hydrology/hydrogeology or quality. Development management criteria for the allocated sites require assessment and mitigation of hydrological impacts and the cumulative impacts from all sites proposed for allocation in the Mineral Sites Plan are not expected to be significant for the county as a whole.

2.9 Recommendations for Mitigation of Impacts

2.9.1 The SA has considered whether there is scope for making recommendations for measures to prevent, reduce and as fully as possible offset any significant adverse effects of the updated MSP. A series of recommendations are made which are summarised in **Section 7.2** and set out in detail in **Appendix C**.



2.10 Reasons for Selecting Alternatives Dealt With

- 2.10.1 The SA is required to appraise reasonable alternatives to an MSP updated to include the new site proposed for allocation on Land South and West of Hermitage Quarry. No other site for the extraction of hard rock was nominated during two Calls for Sites undertaken in 2022 and 2023. Although an assessment has been made of potential alternative sites within Kent, no suitable site has been identified.
- 2.10.2 An alternative to allocating the new site at Hermitage Quarry could be to rely instead on imports of hard rock from outside of the county. This has therefore been appraised by the SA as a reasonable alternative.
- 2.10.3 Importation of hard rock to meet local needs will increase the need for the transport of mineral and associated emissions to air. There is a greater likelihood of negative impacts on air quality and greenhouse gas emissions, and negative impacts may be caused by congestion, noise and disturbance, depending on route and distance. The total distance transported is likely to lead to higher emissions overall. Importation of hard rock is also likely to have adverse economic impacts from increased transport costs and loss of jobs within Kent, although jobs would be supported at quarries outside Kent. Kentish ragstone would not be available for use in heritage restoration projects, therefore adverse impacts on the built historic environment are likely if suitable alternatives cannot be found.
- 2.10.4 Importation from elsewhere may have adverse impacts on communities and the environment in proximity to the sites where extraction takes place, but this is dependent on where the mineral comes from and the conditions at those sites. The control of impacts at those sites is a matter for the relevant Mineral Planning Authorities.

2.11 Methodology

- 2.11.1 The SA is required to undertake an appraisal of an MSP updated to include the new site proposed for allocation on Land South and West of Hermitage Quarry. The new proposed site and associated reasonable alternative have been subject to assessment using the SA framework set out in **Section 2.7** (see **Table 2.1**), making a largely qualitative assessment with reference to available baseline data. Assessment matrices have been drafted and are presented in **Appendix C** and the results are summarised in **Section 7.1**.



- 2.11.2 The SA must also appraise the existing allocated sites as these would also be included in an MSP updated to include the new site proposed for allocation. These sites were appraised in the SA of the currently adopted MSP during its development, the results of which were set out in the SA Report accompanying that Plan, published in November 2020. This appraisal work has been reviewed and updated where appropriate, including to incorporate the more recent additions to the appraisal framework highlighted in **Table 2.1**.
- 2.11.3 In reporting the results of the appraisal, the following symbols have been used to indicate the broad nature of the predicted effect:

Table 2.2 – Effects Symbols

Type of Effect	Symbol
Significant positive effect	++
Some positive effect	+
No effect	0
Some adverse effect	-
Significant adverse effect	- -
Uncertain effect	?

- 2.11.4 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 5** of the main report. These relate to the lack of available data in some instances, lack of operational detail and uncertainties about the scale and nature of some impacts.

2.12 Monitoring Recommendations

- 2.12.1 The sustainability appraisal has developed a set of recommendations for monitoring the predicted and unforeseen impacts of implementation of an MSP updated to include the new site proposed for allocation on Land South and West of Hermitage Quarry. These are set out as a series of indicators related to the sustainability appraisal framework based on the likely and possible impacts of such an updated MSP. The recommended indicators should be incorporated into the Annual Monitoring Report for the KMWLP and are set out in **Section 8**.





Kent Mineral Sites Plan

Hermitage Quarry – Suitability for Allocation Assessment Report

June 2026

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1.0 Introduction

- 1.1 This report has been prepared to assess whether land south and west of Hermitage Quarry should be proposed for allocation in the Kent Mineral Sites Plan, having regard in particular to the allocation tests in Policy CSM2 (Supply of Land-won Minerals in Kent) of the Kent Minerals and Waste Local Plan 2024-39 (KMWLP), material associated with a consultation on a draft updated Kent Mineral Sites Plan in 2023, and the current technical evidence base. On this basis the report includes a recommendation on whether the site is considered suitable for allocation.
- 1.2 The wider corporate policy framework has been taken into account in preparing this report, in particular the Council's wider environmental and growth objectives - including those set out, for example, in the Kent Environment Strategy, the Kent and Medway Energy and Low Emissions Strategy, Kent Plan Bee, Kent Plan Tree, Kent and Medway Local Nature Recovery Strategy, and the Kent and Medway Economic Strategy.

2.0 Hermitage Quarry, site, proposal and current evidence base

- 2.1 The proposed allocation is named "Land to the South and West of Hermitage Quarry", and is nominated for "Extraction of Hard Rock of the Limestone Hythe Formation (Kentish Ragstone)". The site lies within Tonbridge and Malling Borough (northern part of the site) and Maidstone Borough (southern part), and within East Malling and Larkfield Parish and Ditton Parish (in Tonbridge and Malling Borough). The southern part of the site falls within Barming Parish in Maidstone Borough and is approximately three miles north west of Maidstone town centre and near to the residential areas of Barming and Allington (see Figure 1).
- 2.2 The site covers an area of 96 hectares from within which the promoter (Gallagher Aggregates Ltd (GAL)) suggests an area of up to 49 hectares could be worked subject to planning constraints, with an estimated resource of up to approximately 23 million tonnes of Ragstone Hard Rock, and an estimated output of approximately 0.9 million tonnes per annum.
- 2.3 The land is currently dominated by sweet chestnut coppice plantation (with an 'ancient woodland' designation) with some agricultural fields and the promoter suggests it would be restored to original levels with inert restoration materials (circa 500,000 tonnes per annum) and returned to mixed native woodland and meadow that would contribute to compensation for the loss of land designated as ancient woodland, and subject to biodiversity net gain requirements.
- 2.4 Hermitage Quarry is owned by the Gallagher Group, a local business that was founded in 1973. It has expanded to become a significant Kent employer with an annual turnover of over £235 million with Gallagher Aggregates Ltd contributing around £58 million in 2024/25. The quarry is the primary source of Kentish Ragstone which is used for the restoration of heritage sites and in the construction of modern buildings, roads and other infrastructure.

- 2.5 It is a local business that is well embedded in the local community. It operates the ‘Gallagher Academy’ at Hermitage Quarry, which includes an apprenticeship and Kent Skills Hub (a permanent facility opened in June 2026) and it is engaged in a wide range of community initiatives.
- 2.6 Operations at Hermitage Quarry include civil engineering, property development and aggregate production. Hermitage Quarry is the most significant part of its aggregates business. Along with the nearby Blaise Farm quarry (also owned by the Gallagher Group), Hermitage Quarry is the only source of Kentish Ragstone that is still actively quarried, but is of higher quality than the Blaise Farm reserves in respect of its heritage restoration applications, and to maintain the traditional architectural vernacular of areas where the stone has been historically used. KMWLP Policy CSM 9: Building Stone in Kent specifically references Hermitage Quarry for its ability to provide distinctive, high-quality stone suitable to maintain and restore historic buildings across South East England, including the Tower of London, buildings at Knole Estate, Rochester Cathedral and Leeds Castle. Hermitage Quarry houses a specialised masonry and heritage stone facility, which provides Kentish Ragstone for repairing and restoring a wide range of historical landmarks across London, the South East region, and more widely.
- 2.7 Kentish Ragstone also has wider non-heritage uses, including gabion walls for structural revetment use, RIP RAP used in large infrastructure projects and decorative and landscaping applications.
- 2.8 The site currently includes various processing plants, to deliver a wide range of aggregates from virgin and recycled sources, a ready-mix concrete plant and a concrete tunnel, which enables heavy plant machinery to be transported between the processing facilities in the original quarry and the newer working areas.
- 2.9 Hermitage Quarry recycles hardcore materials from twenty-one recycling centres across Kent and it includes an inert landfill site. Once the hard rock has been quarried, the land is restored, including by backfilling, representing a full cycle in land use.
- 2.10 According to GAL, around 70% of the hard rock that is quarried at Hermitage Quarry is used for housing and associated infrastructure, including roads, commercial and industrial premises and community facilities, such as local schools.
- 2.11 The entrance to the quarry is via Hermitage Lane (B2246), which itself connects to the A20 London Road and Junction 5 of the M20.

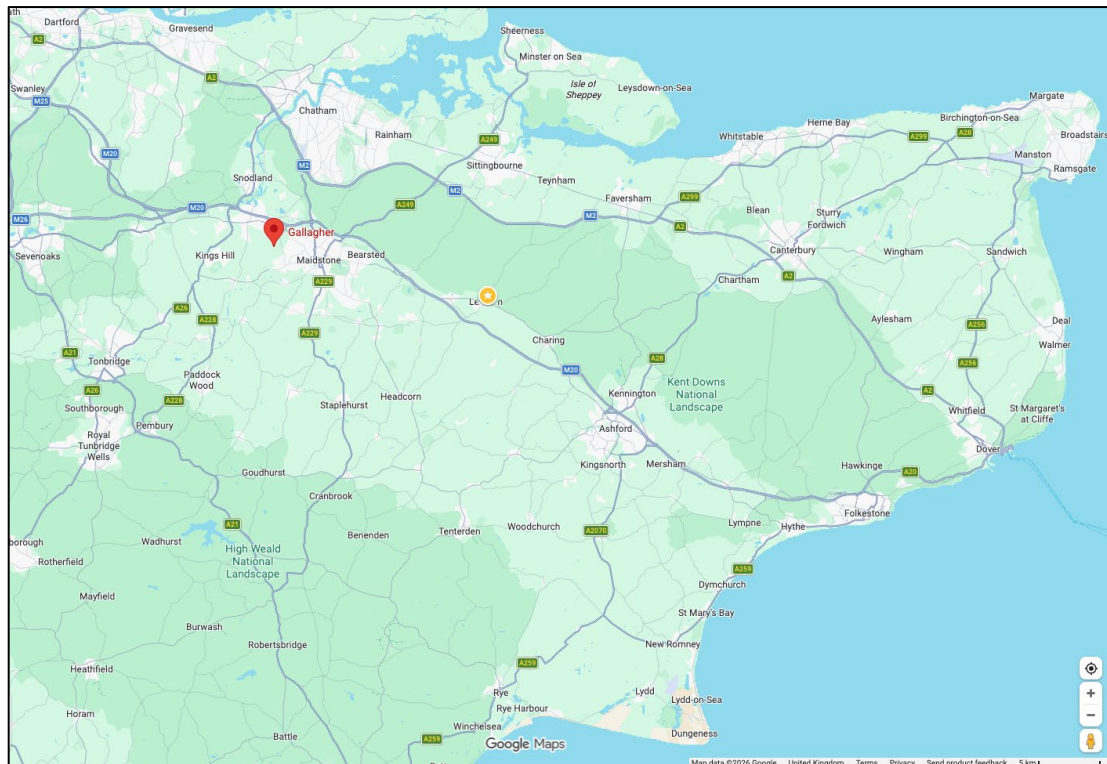


Figure 1: Location of Hermitage Quarry ('Gallagher')

- 2.12 In 2013, following a public inquiry, the Westerly Extension of the quarry was approved by the Secretary of State, stretching around 79 acres into Oaken Wood including an area of 'Plantation on Ancient Woodland Soils' (PAWS). Despite the loss of PAWS, permission was granted in recognition of the fact that the extension allowed an additional 16.2 million tonnes of ragstone to be quarried at the site, extending its lifespan to between 2034 and 2038, at the time safeguarding and creating jobs for a further 20-25 years.
- 2.13 Long term demand for aggregates is difficult to quantify, but the South East England Aggregate Working Party (SEAWP) highlights significant infrastructure projects in the south east that *"could affect aggregate provision"*. These include Heathrow and Gatwick Airport expansions; Rampion 2 Windfarm; Lower Thames Crossing; Ebbsfleet Garden City; and the Oxford-Cambridge Arc.
- 2.14 Hermitage Quarry accounts for approximately 30% of Kent's total crushed rock sales, with much of the remainder being imported (56.6%) mainly from the South West and East Midlands regions of the UK, and Northern Ireland, Scotland and Norway.
- 2.15 At the end of 2024, there were 12.13 million tonnes of hard rock reserves at the Hermitage and Blaise Farm Quarries. Based on a six-year sales average of 1.34 million tonnes per year, this suggests around 9 years of reserves remaining (to 2033) which is below the policy requirement to maintain a 10 year landbank.
- 2.16 The further extension to the south and west would allow extraction of a further potential 23 million tonnes of ragstone, extending the lifespan of the quarry for up to 20-25 additional years. The nominated extension would result in the loss of

additional further PAWS, though the site promoter proposes to compensate this impact. Ultimately the proposal is that the PAWS soils are translocated and the site would be restored to native woodland of greater species diversity than the current Sweet Chestnut plantation.

Evidence Base

- 2.17 The current work on the Kent Mineral Sites Plan forms part of the wider updating of Kent's minerals and waste planning framework. The existing Kent Mineral Sites Plan was adopted by Kent County Council in 2020 and allocates sites for soft sand and sharp sand and gravel. At the time, there was no need to plan for landwon hard rock. In preparation of the Kent Minerals and Waste Local Plan 2024–2039, (which updated the Kent Minerals and Waste Local Plan 2013-2030), the County Council subsequently identified the need to consider whether the Mineral Sites Plan should also be updated to ensure that sufficient provision could be made for landwon hard rock over the extended plan period. Work on identifying an additional site for hard rock commenced in 2022 as part of that wider plan-making programme.
- 2.18 Identification of a site (or sites) commenced with a first 'call for sites' for hard rock in late 2022, following which a single site, land to the south and west of Hermitage Quarry, was nominated by GAL. The Council then carried out consultation in June and July 2023 on the nominated hard rock site, supported by an initial 'RAG' assessment and draft Sustainability Appraisal, and, in light of comments received, subsequently undertook a second call for sites from August to October 2023. Detailed technical assessment of the nominated site commenced, but progress on the Mineral Sites Plan paused while resources were focused on the examination of the Kent Minerals and Waste Local Plan 2024–2039, which was adopted on 13 March 2025. The current stage of work concludes consideration of the nominated Hermitage Quarry extension site against the relevant policy tests, the Regulation 18 consultation responses and the current technical evidence including Sustainability Appraisal, in order to inform a decision on whether the site should proceed as a proposed allocation in an updated Kent Mineral Sites Plan.
- 2.19 The technical reports and correspondence on which this report is based, are from three main sources, statutory consultees (for example Natural England (NE)), Kent County Planning and Technical Officers (and their technical and planning advisors), and information prepared and submitted in support of the allocation by the Promoter. A list of the main key technical documents which have been referenced in the preparation of this Report are included in Appendix 1.

Key issues emerging from the evidence

Ancient Woodland

- 2.20 The most important issue in determining whether to allocate the site, is the potential for the extension to cause harm to the area currently (and historically) planted as a Sweet Chestnut Coppice non-native plantation woodland. The formal designation of this land as a Plantation on Ancient Woodland Site (PAWS) means that "*wholly exceptional reasons*" and a "*suitable compensation strategy*" are required to justify

any allocation of a quarry. Establishing that a quarry development would first meet the relevant ancient woodland planning policy tests is the principal consideration to be addressed when assessing the suitability of the site in planning policy terms.

Kentish Ragstone Dimension Stone

- 2.21 The quarry provides the only UK source of Kentish Ragstone suitable as an essential raw material in the maintenance and repair of nationally significant historic buildings and structures and as a source of material for local vernacular building stone. The conservation of historic buildings should be attributed great weight in accordance with the NPPF (para 213), and is a very significant factor weighing in favour of allocating the extension site to enable a continuation of the supply of this essential material.

Other Considerations

- 2.22 The land-won hard rock aggregate landbank for Kent is currently approximately nine years. Kent is required to maintain a ten-year landbank for crushed rock for aggregates provision, and the extension to Hermitage Quarry is the only site which has come forward from the “call for sites” from where this continuing need could be met.
- 2.23 The quarry operators, Gallagher, are a significant local employer in Kent, and without the allocation, jobs currently associated directly and indirectly with the continued operation of the quarry would be lost. The operator estimates the approximate number of jobs at risk to be 140 provided directly by GAL, plus indirect employment opportunities – via circa 400 Kent based companies in GAL’s supply chains¹.
- 2.24 The site has potential to result in environmental harms typically associated with quarry developments, particularly in respect of issues such as landscape, noise, the loss of agricultural land, a right of way and highways.
- 2.25 A *Natural Capital Report* prepared by the Promoter presents an estimated assessment of the Natural Capital Value of woodland creation, habitat restoration and management and socio-economic impacts for *Land South and West of Hermitage Quarry*. Covering carbon sequestration and storage, recreation and tourism, biodiversity net gain, agricultural biomass, tax impacts and socio-economic impacts the overall Net Natural Capital Gain is estimated in net present value by the Promoter as approximately £144 million. Whilst the natural capital benefits are noted, the monetary value ascribed to these has not at this stage been included within the factors considered to determine whether “*wholly exceptional circumstances*” exist as they have not been independently verified.

¹ BPP Consulting, Socio-economic Impacts Report, April 2026
Project: Kent Mineral Sites Plan
Report: Hermitage Quarry Suitability for Allocation Assessment Report
Version: Final
Date: June 2026

3.0 Plan Allocation Policy for Sites in Kent

- 3.1 Policy CSM2 of the KMWLP is the salient policy which must be met in establishing whether a site should be allocated in a Sites Plan. This states, in relation to proposals for crushed rock sites, that:

“Policy CSM 2 Supply of Land-won Minerals in Kent

Mineral working 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.

1. Aggregates

Provision will be made for the supply of land-won aggregates as follows...:

... • Crushed rock: A landbank of hard crushed rock at least equal to the 10-year landbank (as set out in the latest Local Aggregates Assessment) will be maintained throughout the Plan period.

Additional sites required to maintain landbanks of land-won aggregates at the levels stated above will be identified if possible, in the Mineral Sites Plan. A rolling average of ten years' sales data and other relevant information will be used to assess landbank requirements on an on-going basis, and this will be kept under review through the annual production of a Local Aggregates Assessment...

6. Selection of Sites for Allocation

The criteria that will be taken into account for selecting and screening the suitability of sites for allocation will include:

- the requirements for minerals set out above;*
- relevant policies set out in Chapter 7: Development Management Policies*
- relevant policies in district local plans and neighbourhood plans;*
- strategic environmental information, including landscape assessment and Habitat Regulations Assessment (HRA) as appropriate;*
- their deliverability; and*
- other relevant national planning policy and guidance.”*

- 3.2 The policy makes clear that *“Sites identified in the Minerals Sites Plan are generally where viable mineral resources are known to exist, where landowners are supportive of mineral development taking place and where it is considered that planning applications are likely to be acceptable in principle in planning terms.”*
- 3.3 The Policy (which relates to aggregates) does not directly address the need for the Kentish Ragstone, and the broad approach that should be taken in respect of minerals falling outside the scope of the Policy (and hence not being allocated a Site in the Plan), is set out in paragraph 5.4.2, which states *“...Planning applications for minerals development on non-allocated sites (other than with respect to silica sand, which is provided for under Policy CSM 2 where no allocations are proposed to be made) will be considered having regard to the relevant objectives and policies of the*

development plan as a whole, in particular the need to plan for a steady and adequate supply of mineral.”

Policy CSM 2 as the decision framework

- 3.4 Hermitage Quarry can be assessed against the tests of Policy CSM2, based on the currently available evidence base. Where gaps exist in the evidence base, these are acknowledged in the assessment. Taking each test from part 6 in turn:

Is there a requirement for the mineral?

- 3.5 The proposed Site would produce two separate and distinct products, crushed rock for use in construction, and a very high value Kentish Ragstone (Dimension Stone), which is a unique source of material for the conservation, restoration and maintenance of historic buildings and structures. The requirement for these two products is addressed separately.

Crushed Rock

- 3.6 This material makes up the overwhelming majority of the current quarry output.
Hard rock shortfall over the plan period
- 3.7 As mineral planning authority, KCC has a statutory obligation to prepare planning policy concerned with the supply of minerals. Such policy must be consistent with national planning policy including the requirement to plan for an adequate and steady supply of aggregate minerals over a minimum 15-year period. KMWLP Policy CSM 2 identifies a shortfall of 17.38Mt to maintain provision for the requisite 10 year ‘landbank’ of crushed rock throughout the Plan period, however the latest LAA indicates that an additional 19.9Mt is required. Therefore, additional sites to maintain the requisite landbank of crushed rock should if possible be identified, with the *“presumption that provision would be made by means of the allocated sites coming forward and providing the mineral required at the appropriate time.”* (para 5.4.2)

Whether the site is the only or most appropriate to meet that shortfall?

- 3.8 KCC has undertaken two “call for sites” consultations in 2022 and 2023 to encourage future mineral sites to be nominated from which to meet the identified need for sources of crushed rock in Kent. However, no other sites have been proposed from where this need could be met once the current reserves at Hermitage Quarry and Blaise Farm Quarry have been exhausted. This is expected to occur approximately around 2033. It is also of note, that two previous calls for sites undertaken when the previous Plan was prepared also failed to identify alternatives, and no other site has been promoted in the period since 2023 since the most recent “call for sites”, despite awareness of the need.
- 3.9 The Promoter has submitted an alternative sites assessment as part of the technical work undertaken in respect of the justification for the proposed allocation, and work has been undertaken by the Council’s technical advisors to confirm opportunities for alternative sources of material, neither of which have resulted in the identification of appropriate land-won sources within Kent.

Availability of alternatives

- 3.10 Recycled aggregate materials, similar to those currently produced at Hermitage Quarry could meet some of the need for some crushed rock. Though as a substitute recycled materials are limited in their application to bulk fill, granular bases, coated (bitumen) roadstone/hot rolled asphalt and highway surface dressings. Ragstone as a primary aggregate can also be used for buried and structural concrete applications that require load bearing and tensile strengths that recycled and secondary aggregate materials cannot provide. The use of recycled and secondary aggregate derived materials for river and sea defences may also be far more limited.
- 3.11 Without an extension to Hermitage Quarry, Kent (and much of the wider South-East and London) would be more heavily reliant on imports of crushed rock via sea, rail and road once the current reserves are exhausted. The main accessible sources of crushed rock which currently meet demand in the South East, are the South West, East Midlands, and sources outside England and Wales. However, substantial crushed rock reserves currently exist outside Kent (albeit a significant distance away) and there is potential capacity at aggregates railheads and wharves for their importation and onward transportation by HGV to their point of use.
- 3.12 The latest LAA records hard crushed rock wharf imports of 1.44Mt in 2024 and rail imports of 0.317Mt in 2024, while also recording substantial remaining import capacity, including 8.210Mtpa wharf capacity and 2.225Mtpa rail depot capacity.
- 3.13 The latest LAA suggests that, in theory, Kent has sufficient railhead and wharf capacity to meet all of Kent's need via these sources. However, no definitive figures currently exist which demonstrate this. Although the decision in respect of the allocation is based upon this assumption being true, in the event spare capacity diminishes over time due to losses of importation facilities, or is currently lower than believed, then the case for allocation would become stronger. Moreover, the LAA cautions that apparent headroom in capacity does not account for practical operational limitations, system complexity and the need to maintain a degree of capacity headroom to enable the importation system to be resilient against future supply shocks and be able to respond to increased needs irrespective of any further land-won allocations.
- 3.14 The importation of material from outside Kent to meet its identified need is not without associated social, environmental and economic downsides resulting from the extraction and transportation of this material.
- 3.15 Communities living close to the quarries from which the material is imported would in broad terms be expected to experience similar issues from the extraction of the material itself as those experienced by communities in Kent. In general terms, planning harms would still result, these would merely be displaced to the communities in the alternative locations from where the need for material for use in Kent was met instead.
- 3.16 Environmental harms resulting from quarrying are generally more nuanced than social harms, and tend to vary more widely depending on the nature of the activity

and the specific environmental constraints of the site. However, environmental harms always result from the transportation of material from a quarry to its point of use, primarily in respect of associated carbon emissions – much more so, where the material is transported the whole of the distance from the quarry to the point of use by HGV. The potential for carbon emissions is addressed in the Carbon Assessment for Potential Extension to Hermitage Quarry report (WSP, June 2026).

- 3.17 Where all the other planning considerations are equal, sourcing material as locally as possible to its final point of use will almost always be environmentally preferable to sourcing material from more remote locations. Sourcing material to be used in Kent, from within Kent, should always be preferred in principle (KMWLP policies CSM12, DM13), where acceptable locations from which to source material exist.
- 3.18 Sourcing material more remotely (in general terms) also usually results in economic harms when compared with sourcing local material. The greater cost of transportation feeds through into an increase in the price of the product, and jobs associated with the quarrying operations themselves are displaced to other parts of the Country, or abroad, with the resultant economic benefits lost to the local economy.
- 3.19 In the light of the above, the preferred option to meet need in Kent, would be to extract crushed rock from an extension to Hermitage Quarry (the only identified future source of this material in Kent) in a socially, environmentally and economically acceptable way.

Kentish Ragstone Dimension Stone

- 3.20 Hermitage Quarry produces a specialist Dimension Stone, which is a very important planning consideration attracting great weight (NPPF 224(f)). The Kentish Ragstone Dimension Stone is crucial for the sensitive repair and maintenance of historic buildings including the UNESCO World Heritage Sites – Tower of London, Palace of Westminster, Westminster Abbey and Canterbury Cathedral, and historic Listed buildings local to Kent including Rochester Cathedral, and Leeds Castle (Maidstone), with a proportion also used in the construction of new buildings. The current planning permission requires an annual minimum of 25,000t of Kentish Ragstone to be supplied, and this would remain the case. At any one time a minimum stockpile of 12,500t of Kentish Ragstone is proposed to be retained for use in emergency works such as sea defences. Monitoring data provided by the Promoter show ten-year average sales of Kentish Ragstone (as a building stone) are 1,740tpa over the past ten years (and there is no reason to expect this to significantly change), with a further approximately 17,000tpa (based on 2025 figures) used in non-heritage uses (overwhelmingly consisting of 6G used in gabion walls for structural/revetment works). However, this demonstrates that supply exceeds demand, and the materials are being retained to meet future supply for restoration projects in accordance with sustainability principles.
- 3.21 Policy CSM 9 addresses the way planning applications for building stone should be considered in principle. This policy states that *“planning permission will be granted for proposals that are needed to provide a supply of local building stone necessary*

for restoration work associated with the maintenance of historic buildings and structures and new build projects, subject to: 1. Development taking place in appropriate locations where the proposals do not have unacceptable adverse impacts on the local environment; and, 2. There being no other suitable, sustainable sources of the stone available.”

- 3.22 The Inquiry Inspector for the extension currently being worked described the heritage value of the Kentish Ragstone Dimension Stone as follows:

“It has been used in a long list of very prestigious buildings such as the Tower of London, Canterbury Cathedral, Rochester Cathedral, the Guild Hall, the Greenwich Maritime Complex and the precincts of Westminster Abbey, as well as over a thousand listed buildings. It has been used in four of the UK’s 12 World Heritage Sites and it is also significant in the character of at least 51 Conservation Areas in Kent.”
(para 16.9)

“From time to time, new dimension stone is required for the restoration, alteration or extension of these buildings. Whilst alternative materials such as Chilmark Stone have been tried in the past for restoration purposes, they do not match the original ragstone in substance, texture, quality or colour. Nor do they have the same weathering characteristics. Accordingly, English Heritage and those responsible for the upkeep of these historic buildings consider it essential to maintain a supply of Kentish Ragstone for dimension stone purposes.” (para 16.10)

Other benefits of the Allocation

- 3.23 The continued operation of the site would enable retention of the Skills and Training Hub for training on Lower Thames Crossing construction and hard to reach groups and prisons. This is considered a valuable facility for social and economic reasons.

The continued operation of the site would allow the contribution it makes to waste management and recycling in Kent to continue, and of particular note is the sites function as the only facility capable of processing difficult to manage Air Pollution Control residues (APCr) from Energy Recovery Facilities. The continued operation of the site would allow these functions to continue in the future.

The continued operation of the site would allow for the continuation of the secondary aggregates manufacturing facilities, which provide material important to reduce the demand for primary minerals. Without the facility, the overall supply of construction aggregates will reduce, and alternative sources to meet this demand will need to be found.

- 3.24 The Secretary of State’s decision letter following the Inquiry for the current extension stated:

“The Secretary of State agrees with the Inspector that, in the absence of permission for the Westerly Extension, the currently permitted reserves would be exhausted in late 2014 or early 2015, after which time the core of the workforce would no longer be required and there would be a phased downsizing of the remainder. He agrees with the Inspector that it is unlikely that many of these employees would be re-

deployed within the associated Gallagher businesses, and that these other businesses could also be affected by the closure of the quarry. He also agrees with the Inspector that not only would the loss of these jobs be a personal blow to the employees, but that these skilled workers currently make a beneficial contribution to the diversity of the workforce in Kent.” (para 24)

“The Secretary of State also agrees with the Inspector that, in the event that permission for the proposed extension was refused and the existing quarry closed by early 2015, crushed rock would have to be imported into Kent by other suppliers, who would not necessarily be subject to the competition currently provided by the appellant, and that this could well increase prices, to the detriment of the local economy.” (para 25)

Whether the site is the only or most appropriate to meet this need?

- 3.25 Hermitage Quarry is the only source of Kentish Ragstone available and suitable for heritage purposes. The KMWLP recognises (para 5.9.1) that *“Only two ragstone quarries have consented reserves at the time of the preparation of this Plan: Hermitage Quarry and Blaise Farm in mid Kent. Although building stone has been produced from both quarries, only Hermitage Quarry has the ability to produce high-quality cut stone from the full sequence of ragstone beds in the Hythe Formation, and it continues to provide building stone for building conservation uses.”*

- 3.26 As well as confirming the lack of any suitable alternative sources at that time (2013), the Inspector’s Decision on the Inquiry for the current operational quarry extension also stated that at that time:

“There have been two separate calls for minerals sites as part of the Kent Minerals and Waste Development Framework, but no other ragstone sites have been forthcoming” (para 16.17).

“The lack of any other viable alternative site for ragstone extraction is supported by the Alternative Sites Study carried out by the Applicant...This identified an initial 118 possible sites. 18 were studied in detail and none found to be viable alternative sites to Hermitage and Blaise Farm Quarries.” (para 16.18)

“Building stone has been produced in the area for centuries but at present Hermitage Quarry is the only source of good quality Kentish Ragstone for dimension purposes. Policy CSM6 of the emerging Minerals Plan does support bespoke building stone quarries. However, the need to remove large quantities of overburden or other material in order to extract the ragstone is likely to make it uneconomical to operate a bespoke building/dimension stone quarry in this area in the current economic climate.” (para 16.32).

“Although there is no separate apportionment for building/dimension stone, there is a substantial need to maintain a supply of specifically Kentish Ragstone for maintenance and restoration of many very notable buildings.” (para 16.38)

“There is little prospect of a significant supply from the demolition of existing buildings and also little prospect of any bespoke building/dimension stone quarries being started in the area. Building/dimension stone would however be available from

some of the beds in a ragstone quarry worked primarily for aggregates. Not only are the ragstone beds at Blaise Farm mainly too thin to produce the larger pieces for quoins and copings for restoration work, but they have been tried for some dimension purposes and found unacceptable because of their relatively poor quality. In contrast, the Westerly Extension to Hermitage Quarry would provide good quality deep bed Kentish Ragstone for which there is a well-established need.” (para 16.39).

3.27 Evidence gathered by the Promoter has reviewed geological information for the Kentish Ragstone resource and Study Area within which the assessment was undertaken, and this included the 18 sites which were subject to detailed assessment. The geological information built on the findings of an assessment undertaken for the previous planning application for the current quarry extension and evidence available at the time and concludes that there is no comparable deposit/potential to meet the building stone need (for heritage purposes) currently met from Hermitage Quarry.

3.28 KCC’s technical advisors have also reviewed the potential for alternative sites to meet the need for Kentish Ragstone (Alternative Ragstone Supplies, WSP, 2026) in the context of the updated information provided by the promoter. The Report highlights some key issues which set the Kentish Ragstone at Hermitage apart from other hypothetical future sources, specifically:

“Hermitage Quarry is the primary source of thick beds of ragstone, suitable for both dimension stone, building stone and other building materials. At Hermitage Quarry, the Hythe Beds are ~30m thick.” (para 3.2.5)

“...Although located just 5km west of the Hermitage quarry, and exposing the same geological formations the inquiry [on the previous extension] noted that Blaise Farm Quarry has much thinner beds of ragstone, a higher proportion of hassock beds to ragstone beds. Moreover, according to evidence presented by stonemasons, stone from Blaise Farm Quarry did not satisfy requirements for quality building stone for restoration of historical buildings...” (para 3.2.8)

“More recently, this position has been reiterated by the Stone Federation Great Britain, who in a letter to Kent County Council dated 11 July 2024, noted the importance of Kentish Ragstone as a building stone as important for many historic landmarks and highlighted that there is no suitable alternative limestone in existence that could be used in place of Kentish Ragstone for restoration and repair” and that Hermitage Quarry is ‘the only source of Kentish Ragstone in the UK.’” (para 3.2.9)

“It is further considered that up to date evidence provided by Gallagher robustly demonstrates that Hermitage Quarry is likely the only location in Kent that could currently provide a secure and sustainable source of ragstone for building stone (and aggregate) purposes.” (para 5.1.3)

3.29 They also advised that further evidence was required in respect of (a) whether building stone quality material is being used for aggregate purposes; and (b) what the anticipated future demand for building stone is, to ensure that the correct ‘importance’ is attached to Hermitage Quarry as a supplier of restoration stone and

this information was subsequently obtained from GAL after the report was finalised and is referred to in paragraph 3.20 above.

Is the site consistent with relevant development management criteria?

- 3.30 An Initial (RAG) Assessment² of the proposed allocation was undertaken in May 2023. Since then, more detailed assessment has been undertaken through further technical work which forms the evidence base for the Plan. The documents and consultation responses referred to are referenced in Appendix 1.

Biodiversity - PAWS - irreplaceable habitat

- 3.31 A significant part of the site is designated as PAWS. Ancient Woodland is defined by Natural England as an area of land that has been wooded continuously since at least 1600 AD. It includes plantations on ancient woodland sites (PAWS), replanted with conifer or broadleaved trees, that retain ancient woodland features, such as undisturbed soil, ground flora and fungi. PAWS, although a habitat with significant human intervention in the form of plantation woodland, have maintained a continuous link between the ancient woodland present in the past by maintaining tree cover without a period of conversion to another land use type (such as arable, pasture etc).
- 3.32 A large proportion of the Site is within Oaken Wood, Barming Local Wildlife Site which has been designated for the large block of ancient broadleaved woodland (the majority of which has been converted to chestnut coppice and is actively managed) and the more recent woodland at East Malling Heath on the western side of the LWS. Some ancient woodland indicator plant species have been recorded within the LWS, and the citation states the LWS is important for birds and invertebrates and also includes a pond on the southern boundary.
- 3.33 The Woodland Trust has an Ancient Tree Inventory, which notes the presence of a “Notable Tree” (oak *Quercus* sp.) within the Site at grid reference TQ71005519 that has a diameter at breast height of 4.5m. However, the record also notes that the tree was located on private land and not visible from public access. As the woodland within the Site is publicly accessible, it may be that the accuracy of the grid reference provided for the notable tree is relatively low, and therefore the notable tree is not actually located within the proposed Site Allocation. There are also two large trees potentially affected at the entrance to Luckhurst Farm. Surveys undertaken by Ecology Solutions in 2023 indicate that there are no ancient/veteran trees within the proposed Site Allocation, and this would need to be confirmed.
- 3.34 Some trees within the proposed allocation wrapping around the southern and western boundary of the site currently being quarried are protected woodland covered by a woodland TPO. The TPO itself does not present an insuperable obstacle to development because reg.14(a)(vii) of the Town and Country Planning (Tree

2 Initial (RAG) Assessment of the Suitability of Nominated Land to the South and West of Hermitage Quarry for Hard Rock, KCC, May 2023

Preservation) Regulations 2012 permits the cutting down, topping, lopping or uprooting of a tree protected by a TPO “*insofar as such work is necessary to implement a planning permission*”. However, it would be necessary to consider the following at the planning application stage:

- a. The reasons why these trees are protected;
- b. The extent to which those trees will be harmed by the development of the Site; and
- c. The extent to which the objectives of the TPO would therefore be compromised by any such development.

3.35 In summary, the salient constraints to quarrying of the Site are the presence of PAWS, and a secondary constraint is the presence of Oaken Wood LWS. In particular the presence of PAWS, make development of the site incompatible with planning policy unless there are wholly exceptional reasons as to why the development should go ahead and a suitable compensation strategy exists. These issues are address later in this report. Further advice has been sought from the Council’s technical advisors and internal ecology specialists, including the Hermitage Quarry – Environmental Support Ecology Report (WSP, 2026).

Health, amenity, air quality and recreation

- 3.36 It is usual for quarrying development to have potential for impacts on health, amenity, air quality and recreation unless the impacts are not appropriately mitigated. With regard to the proposed allocation, this issue is considered below.
- 3.37 WSP conclude in their Health Impact Assessment (Technical Note) (June 2026) that *“...with the continued implementation of operational controls and the introduction of new mitigations, health impacts associated with the proposed allocation of additional land at Hermitage Quarry for the extraction of ragstone is unlikely to pose any significant health risks to the local population. Notwithstanding this, it is expected that any planning application for future development at the Nominated Site would be accompanied by quantitative assessments to demonstrate how impacts on human health, particularly from dust, emissions, noise and vibration, will be managed to acceptable levels. Such quantitative assessments would inform site-specific management plans, and feed into a comprehensive HIA to accompany the planning application.”*
- 3.38 WSP conclude in their Air Quality Assessment (Technical Note) (June 2026) that *“Whilst the expansion of Hermitage Quarry could present some air quality challenges, notably through potential loss of amenity associated with the reduction in distance between the quarry and receptors increasing the effectiveness of the dust deposition pathway, it is unlikely to add to loss of amenity which cannot be addressed through further mitigation measures. An assessment of the extent of loss of amenity will likely form the basis for any air quality assessment going forward. It is likely that the primary outcome of the assessment would be an overhaul to the existing DMP to*

make use of best available techniques and dust management advice which has been updated in the time since the original DMP was published.”³

“With the information available at the time of writing, potential dust release through quarry activities is unlikely to give rise to any significant impacts to human or ecological health. Further ecological surveying and air quality monitoring will be required to thoroughly assess any potential risk of impacts before human and ecological health can be screened from further consideration.”

“Similarly, detailed design information would be required to inform the screening for an assessment of potential odour impacts.”

“Overall, this study has not identified any major constraints related to air quality that would likely result in an unacceptable impact at a sensitive location and present a ‘showstopper’ for future development of the Nominated Site. Following further detailed assessment and the implementation of necessary mitigation it is likely that the Nominated Site will be able to operate in accordance with Local Policy DM11 and the relevant sections of the NPPF.”

- 3.39 In relation to potential noise impacts, WSP state in their Technical Note (June 2026) that *“...it is noted that Hermitage Quarry is currently controlled by a robust set of planning conditions covering all amenity matters – including air quality, noise and vibration – and it is understood that Gallagher has been operating well within the environmental limits currently imposed upon them. In this regard, should the Nominated Site be taken forward for development, it is acknowledged that robust noise and vibration assessments would be required, demonstrating that Gallagher could continue to operate within acceptable national standards and parameters in respect of all amenity matters.”*
- 3.40 With appropriate mitigation, an EIA accompanying a planning application would be likely to demonstrate policy compliance.
- 3.41 Following review of the 2023 initial RAG assessment, and technical information submitted since, it is considered that, insofar as impacts on amenity are concerned, it can be concluded that there are no insuperable obstacles to the allocation of the site in the Sites Plan.

Landscape and visual effects

- 3.42 The RAG Assessment concluded that the Site *“is considered to have a minor adverse visual impact on the landscape.”*

The subsequent Landscape and Visual Technical Note prepared by WSP (June 2026) concludes that *“The scale of the Proposed Development is such that when considered cumulatively, in the context of the existing quarry workings to the east, the quarry would cover a total area of some 150ha, with an overall width in excess of 2km from east to west.”* and that the proposals *“demonstrate a committed approach to phased working, advance planting and long-term restoration in order to mitigate adverse impacts to the landscape from the proposed mineral working. From a visual*

³ DMP = Dust Management Plan

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perspective, adverse impacts would largely be confined to receptors in close proximity to the site boundary. There is extensive woodland cover within the wider study area which would be considered to provide adequate visual screening from the proposed mineral working area. Visual impacts on nearby residential receptors and users of public rights of way could also potentially be reduced through retained woodland buffers, advance planting, bunding and phased working, which would all be subject to detailed design and delivery. The site lies outside the Kent Downs National Landscape, and due to distance, landform and woodland cover, no significant effects on the setting of the designation are anticipated.”

- 3.43 The Site is currently crossed by powerlines and the Promoter is in discussions regarding the potential for diversion or underground cabling. However, due to the early stage of the negotiations this should be given no weight in the decision, and continued existence of overhead powerlines on site or off should be assumed.
- 3.44 With appropriate mitigation, an EIA accompanying a planning application would be likely to demonstrate policy compliance.
- 3.45 Following review of the RAG, and technical information submitted since, it is considered that, insofar as impacts on visual amenity and landscape concerned, it can be concluded that there are no insuperable obstacles to the allocation of the site in the Sites Plan.

Access, transport and highway implications

- 3.46 Hermitage Quarry has good access to the Strategic Highway Network, and schemes are coming forward at Coldharbour Roundabout and in terms of the Whitepost Field link road which will further improve access, but the route is very sensitive at peak times. The local area has also seen a good deal of housing development over the past few years and more will likely come forward in the future.
- 3.47 Any planning application would need to be accompanied by a Transport Assessment undertaken in line with prevailing government guidance, which encompasses M20 junction 5. Overall, there are moderate issues with access to the Primary Route Network and Secondary Route Network. The identified impacts could be mitigated through planning obligations which could include a cap on HGV movements during peak traffic periods.
- 3.48 Since production of the RAG Assessment, highways advice has been updated to state *“...that the area has been subject to development and construction pressures and further development may come forward subject to planning permission/ progress with the T&M Local Plan/ further mitigations being identified and implemented by the sites generating the trips. This would be useful bearing in mind the significant political sensitivities in the area. The key highways mitigation here is to continue with a robust cap on HGV movements, particularly for the peaks.”*
- 3.49 With appropriate mitigation, an EIA accompanying a planning application would be likely to demonstrate policy compliance.
- 3.50 Following review of the RAG, and technical information submitted since, it is considered that, insofar as access, transport and highway implications are concerned,

it can be concluded that there are no insuperable obstacles to the allocation of the site in the Sites Plan.

Hydrology and hydrogeology

- 3.51 The Environment Agency were consulted on the Draft Mineral Sites Plan. The site is located within Zone 3 (Zone III) of a SPZ, total catchment area. The site is located within a principal aquifer. Part of the site is located within a high groundwater vulnerability area. The site is located within Flood Zone 1, low probability of flooding.
- 3.52 The site could have a minor adverse impact on groundwater SPZs or water resources in the absence of low-level mitigation (e.g. working above the water table).
- 3.53 With appropriate mitigation, an EIA accompanying a planning application would be likely to demonstrate policy compliance.
- 3.54 Following review of the RAG, and technical information submitted since, it is considered that, insofar as hydrology and hydrogeology matters are concerned, it can be concluded that there are no insuperable obstacles to the allocation of the site in the Sites Plan.

Services (Electricity Pylons)

- 3.55 As stated previously in respect of landscape, the site is crossed by overhead power lines supported by a pylon which could require major mitigation through rerouting if the resource within the identified area is to be fully worked out.
- 3.56 Initial correspondence between the Promoter and the network provider has intimated that it is possible to divert these lines subject to a detailed feasibility/viability assessment. To assess viability the cost will need to be weighed against the benefit of removing the powerlines.
- 3.57 Although enquiries have been made, the Promoter has not received a definitive answer as to the stand-off required should the powerlines remain *in situ*.
- 3.58 If the pylons need to remain in place, yields from the Site would be lower than estimated due to the need to maintain unworked stand-offs, however a reduced yield would not impact on the merits of allocating the Site in principle.
- 3.59 With appropriate mitigation, an EIA accompanying a planning application would be likely to demonstrate policy compliance.
- 3.60 Insofar as the existence of overhead power lines is concerned, it can be concluded that there are no insuperable obstacles to the allocation of the site in the Sites Plan.

Geology (Geological SSSI – Oaken Wood)

- 3.61 Oaken Wood geological SSSI is located to the southwest of the site boundary. NE recommend appropriate stand-offs to the Oaken Wood geological SSSI are maintained to ensure no impacts. These are proposed with the original proposed boundary for the allocation having been revised and updated to include a greater stand-off. The stand-offs would be finalised at the application stage.

- 3.62 With appropriate mitigation, an EIA accompanying a planning application would be likely to demonstrate policy compliance.
- 3.63 There are no insuperable obstacles to the allocation of the site in the Sites Plan.

Historic Environment

- 3.64 The proposed allocation is located in an area which has not been subject to formal archaeological investigations. As such the Historic Environment Record (HER) does not necessarily reflect a true picture of the archaeological resource surviving on this site. From current information it can be suggested that this is an area of potential for prehistoric remains, including early prehistoric remains, in view of the presence of Medway 5th Terrace Gravels and Hythe Beds fissures which have potential for deposits of geoarchaeological interest and Palaeolithic remains. This area could also have been utilised in the later prehistoric period by farms, small holdings or small communities. The HER does record discovery of Neolithic flints close to Manor Farm and within the proposed extension site.
- 3.65 Overall, there are no designated heritage assets within the proposed extension area. There are designated heritage assets around the site but nothing immediately adjacent. In terms of significant remains, there is potential for significant geo-archaeological and Palaeolithic remains.
- 3.66 Although there are no designated heritage assets within the application site there is potential for significant archaeology and there is also a possible 19th century shooting box, which might merit preservation *in situ*. Specialist geo-archaeological and Palaeolithic assessments are essential as part of an assessment of the historic environment through an EIA process that would accompany a planning application.
- 3.67 With appropriate mitigation, an EIA accompanying a planning application would be likely to demonstrate policy compliance.
- 3.68 Insofar as historic environment considerations are concerned, it can be concluded that there are no insuperable obstacles to the allocation of the site in the Sites Plan.

Soil Quality (excluding areas designated PAWS)

- 3.69 Parts of the site contain best and most versatile land which would be moderately impacted by the development. However, opportunities for mitigation and restoration exist.
- 3.70 NPPF para 187b) recognises that the economic and other benefits associated with the best and most versatile agricultural land should be recognised. Paragraph 188 states that *“Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework”*, and associated footnote 65 states that *“Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.”* Natural England state in their consultation response that *“it is particularly important that restoration and aftercare preserve the long-term potential of the land as a national, high quality resource. Where alternative afteruses*

(such as forestry and some forms of amenity, including nature conservation) are proposed on the best and most versatile agricultural land, the methods used in restoration and aftercare should enable the land to retain its longer-term capability, thus remaining a high quality resource for the future.”

- 3.71 With appropriate mitigation, an EIA accompanying a planning application would be likely to demonstrate policy compliance, or at least accord with the development plan when read as a whole.
- 3.72 Insofar as soil quality is concerned, it can be concluded that there are no insuperable obstacles to the allocation of the site in the Sites Plan.

Public Rights of Way

- 3.73 Public Bridleway MR108 runs through the site, which provides both a strategic link across the wider area, and is also an important leisure route for walkers, cyclists and equestrians. There are also a number of permissive paths on the site. There is significant equestrian use in the area and the nature of Bridleway use (cyclist and equestrian) is of a more “unpredictable” nature and therefore any proposals regarding the route must be particularly well managed. This includes any construction period as well as operational, as there would be likely be a significant impact on the PROW network in the area during both construction and operation. The acceptable diversion of the bridleway will be necessary and will need to be agreed with the PROW and Access Service as the Highway Authority for Public Rights of Way.
- 3.74 The proposed allocation may result in some adverse impacts on existing open space and leisure interests. However, the significance of such potential adverse effects can (and should) be mitigated through the continued application of rigorous on-site operational controls (to minimise the site’s impacts on the locality’s wider amenity). Furthermore, other mitigations, such as the provision of permissive footpaths across Gallagher owned land and/ or the formal temporary/ permanent diversion of an affected Bridleway, are likely to ensure that the local population’s enjoyment of open space and leisure are not significantly adversely affected.
- 3.75 With appropriate mitigation, an EIA accompanying a planning application would be likely to demonstrate policy compliance.

- 3.76 Insofar as public rights of way are concerned, it can be concluded that there are no insuperable obstacles to the allocation of the site in the Sites Plan.

Restoration, aftercare and after-use

- 3.77 The site is proposed to be progressively restored to original levels using on-site (hassock) and imported inert materials from consented waste management activities on the existing quarry site. Woodland restoration would deliver new species-rich native woodland with the translocated ancient soils retaining seeds and bulbs to encourage redevelopment of woodland ground flora. Similar translocation of soils took place for the current quarry extension, with woodland ground flora starting to be seen in the new native woodland required by the Secretary of State as

compensatory habitat. Restored woodland would be managed to establish a varied age profile, providing a variety of niches for wildlife in the area.

- 3.78 A compensation strategy would seek to protect any ancient value in the soils (see section 5) and aim to deliver a significantly higher value native broadleaved woodland to replace the existing non-native monoculture. Compensation areas would be established ahead of time, such that species would not be left without habitat. The development is expected to deliver a significant net gain in area of woodland habitat.
- 3.79 With appropriate design and mitigation, an EIA accompanying a planning application would be likely to demonstrate policy compliance.
- 3.80 Following review of the RAG, and technical information submitted since, it is considered that, insofar as restoration, aftercare and after-use matters are concerned it can be concluded that there are no insuperable obstacles to the allocation of the site in the Sites Plan.

Climate Change and Carbon Impacts

- 3.81 Climate Change and Carbon impacts were assessed in the Carbon Assessment for Potential Extension to Hermitage Quarry report (WSP, June 2026).
- 3.82 The transport assessment found that there is a significant carbon impact from importing crushed hard rock into Kent. Transport emissions were highest for Scenario 2 (Norway) (636,037 tonnes of carbon dioxide equivalent (tCO₂e) over 15 years) and lowest for Scenario 1 (Somerset) (198,804 tCO₂e over 15 years). The results showed that whilst the mode of transport has a significant impact on the emissions, since the transport distances were drastically smaller in rail freight transport, it became a key factor in the determination of transport emissions.
- 3.83 The PAWS assessment shows that the proposed extension of the Hermitage quarry with the proposed restoration woodland would result in an overall positive impact on carbon sequestration, with a change in sequestration of approximately -2,615 tCO₂e between the 'Do Nothing' and 'Do Something' scenarios. This positive impact is due to the change in woodland from a managed plantation with a rotation period to a restored woodland which is assumed to be left undisturbed.
- 3.84 The assessment indicates that reusing hassock as a secondary aggregate in place of imported primary aggregate could offer a net carbon benefit, primarily by reducing transport-related emissions. If approximately 200,000 tonnes of hassock currently disposed of each year were instead used locally within Kent, this could avoid an estimated 3,000-9,000 tonnes of CO₂e annually, depending on the source of primary aggregate displaced. Further assessment was recommended to quantify the embodied carbon impacts of hassock processing and to identify appropriate end uses where its substitution potential can be maximised.
- 3.85 With appropriate mitigation, an EIA accompanying a planning application would be likely to demonstrate policy compliance.

- 3.86 Insofar as climate change and carbon impact matters are concerned, it can be concluded that there are no insuperable obstacles to the allocation of the site in the Sites Plan.

Cumulative effects

- 3.87 The cumulative impacts of activity at the site with existing development may have some impact on the environment and community that will require low level mitigation.
- 3.88 It should be noted that new housing is being built in proximity to the existing quarry which demonstrates the cumulative impacts can be managed in principle using effective mitigation, and, while this matter does not represent an insuperable obstacle to allocation, this will need further assessment at the planning application stage.
- 3.89 With appropriate mitigation, an EIA accompanying a planning application would be likely to demonstrate policy compliance.
- 3.90 There are no insuperable obstacles to the allocation of the site in the Sites Plan.

Conclusion

- 3.91 Except for the loss of designated PAWS (including the potential for the presence of a very limited number of ancient/veteran trees to be confirmed or otherwise by further survey), all the issues addressed above, are considered to be possible to manage acceptably in principle, and could be addressed through an EIA process at the planning application stage.
- 3.92 The loss of PAWS and the planning considerations relating to this are considered, with reference to national and development plan policy, in section 5.

4.0 Is the proposed allocation consistent with relevant district local plan / neighbourhood plan policies?

- 4.1 Assessments have been undertaken of the consistency of the proposed allocation with the relevant adopted and emerging local planning policy frameworks for Maidstone Borough Council and Tonbridge and Malling Borough Council. Those assessments have been taken into account in considering whether the allocation would satisfy the requirements of Policy CSM2. They identify a number of policy tensions and matters requiring careful control, particularly in relation to ancient woodland, biodiversity, landscape, public rights of way, amenity and transport. However, they do not identify any conflict which, in itself, would prevent the allocation from being taken forward, provided that the site specific development criteria in the Mineral Sites Plan and the relevant development management policies are applied.
- 4.2 Overall, the proposed allocation is considered to be broadly consistent with local planning policy. That conclusion is necessarily subject to the specific policy tests relating to irreplaceable habitat being satisfied as discussed in section 5.0, including the need to demonstrate wholly exceptional reasons and a suitable compensation strategy, and to the more detailed assessment of environmental effects at planning application stage. In particular, the allocation would not remove the need for any future planning application to be supported by a full Environmental Impact Assessment and to demonstrate compliance with the development plan as a whole.

Kentish Ragstone

- 4.3 There is a significant amount of local planning policy relevant to the requirement for, and use of, building stone for heritage and conservation purposes.
- 4.4 The adopted Maidstone Local Plan (MLP) describes the way in which the underlying geology has provided locally distinctive materials including the widespread use of ragstone in the local vernacular and historic environment (Policy LPRSP14 (B): Historic Environment para 7.164 and 'Landscapes of Local Value', paras 6 and 7).
- 4.5 Policy LPRSP15 – Principles of Good Design sets out criteria to be met to create high quality design including: *"2. Respond positively to, and where possible enhance, the local, natural, or historic character of the area."*, *"3...making use of vernacular materials where appropriate. For housing schemes vernacular materials should be used on a high proportion of buildings, particularly in key/prominent locations."*
- 4.6 The MLP includes a policy requirement for the retention of Ragstone walls and several site allocations are required to incorporate the use of vernacular materials as a key component in achieving a high standard of design and sustainability
- 4.7 MLP para 9.112 states that the Council *"...strives to improve design build quality and has done work to support this through the production and use of documents such as Maidstone Building for Life 12 - 2018) and the Kent Design Guide.*
- 4.8 In advising how a development could be designed to achieve a local or distinctive identity 'Building for Life' recommends *"The use of Kent ragstone for buildings and walls is a key characteristic of the area and there is great scope for using vernacular*

details such as this in modern ways to reinforce local character. It also recommends that “Ignoring local traditions or character without robust justification.” and “Using materials that do not support the character and identity of the area.” should be avoided.

- 4.9 The ‘value of good design’ section of the *Kent Design Guide* refers specifically to Ragstone as a Kent vernacular building material stating that “...*new buildings should use materials which blend in with this rich tapestry of materials and colours.*”

The adopted Tonbridge and Malling Borough Council (TMBC) ‘Core Strategy’ also aims “*To ensure that new development and other actions result in a high-quality environment...by... maintaining or enhancing local distinctiveness.*”

- 4.10 The TMBC ‘Managing Development and The Environment Development Plan Document’ makes numerous references to the Kent Design Supplementary Planning Document and discusses how local distinctiveness may be shaped by “*..the quality of the built environment in terms of the design of key buildings both modern and historic, the use of local building styles and materials...*”

- 4.11 The emerging policy Draft TMBC Local Plan 2024 – 2042, November 2025 says in para 4.4 that “*The design of new and refurbished buildings will respect our diverse local character and heritage and will have become examples of high-quality design for West Kent.*”

- 4.12 Objective 2 is to “*Protect and enhance the built and natural environment through high-quality design that respects valued landscapes and heritage,...*”

- 4.13 Chapter 9 – Design Quality seeks to “*Ensure that new buildings and spaces complement the rich character of the borough and create inclusive, attractive and healthy places which reinforce local distinctiveness.*”

- 4.14 Emerging Policy D1: Achieving High Quality Design supports developments which are “*Locally distinctive, respond cohesively and create a positive sense of place by demonstrating a thorough understanding of the context and character of an area including...townscape...and materials...*” and that are “*Visually attractive and demonstrate a well-considered design response....and use of local, traditional and high quality materials.*”

Any policy conflicts e.g. landscape, biodiversity, access, amenity, rural development, settlement pattern

- 4.15 Whilst there are issues that will require assessment and mitigation through EIA at the planning application stage, no fundamental conflicts arise, as set out in section 3.

Are any conflicts material to the allocation decision

- 4.16 There is a very obvious tension between the designation of the site as PAWS, and the need for a continuing supply of Kentish Ragstone for heritage purposes. This is a binary issue, with either one or other priority losing out. Both the preservation of our heritage and the protection of PAWS attract great weight as planning considerations.

Strategic Environmental Assessment

- 4.17 A Sustainability Appraisal, incorporating the requirements of Strategic Environmental Assessment, has been prepared to support the updated Mineral Sites Plan. The appraisal considers the proposed allocation of land to the south and west of Hermitage Quarry, alongside the existing allocated sites proposed to be retained, and also assesses the reasonable alternative of not allocating the site and relying instead on imports of hard rock from outside Kent. The appraisal identifies positive effects from the proposed allocation, including continued local supply of hard rock, support for local employment and the continued availability of Kentish Ragstone for building conservation and heritage restoration. It also notes that reliance on imports would be likely to increase transport distances, emissions and costs, and would not provide a continuing local source of Kentish Ragstone.
- 4.18 The Sustainability Appraisal also identifies potential adverse effects, particularly in relation to the loss of land designated as Plantation on Ancient Woodland Site, impacts on Oaken Wood Local Wildlife Site, local landscape character, Public Right of Way MR108 and potential amenity, air quality, water, soil and heritage effects. The SA recommendations can be addressed through site specific requirements for phased working, progressive restoration and aftercare, ancient woodland soil translocation, native woodland and meadow restoration, biodiversity net gain, public rights of way diversion and reinstatement, landscape mitigation and detailed assessment at planning application stage. Where effects cannot be fully mitigated, most notably in relation to PAWS, they have been considered separately through the assessment of wholly exceptional reasons, the suitability of the compensation strategy and the overall planning balance.

5.0 Is the Site deliverable?

Land ownership/control

- 5.1 The whole of the proposed allocation, and a significant area of surrounding land is within the control of the Promoter. Further information has been submitted which establishes that sufficient suitable land exists to deliver a suitable compensation strategy for the loss of PAWS. This would be delivered from within the wider landholding and, if necessary, in other locations.

Practicality of working the site

- 5.2 The pylons currently crossing the land are a constraint upon future quarrying operations which is addressed earlier in the report. Whilst representing a potential constraint on the total yield of material recovered from the site, the existence of the pylons does not give rise to a situation where the future quarry operations would be prevented altogether.

Deliverability of restoration and other mitigation

- 5.3 The deliverability of an appropriate site restoration has been considered, as is addressed elsewhere in this report. Overall, it is considered that the restoration scheme is appropriate, and sufficient land exists within the wider landholding, or can be obtained, to deliver a suitable compensation strategy to meet the test of planning policy for land designated as PAWS.

Whether the site is sufficiently deliverable to justify being relied upon as an allocation in the Sites Plan

- 5.4 Planning permission would be required before any proposal to extract the minerals from the land could proceed. A future planning application for extraction of the minerals, will require a full EIA, through which process a detailed assessment of environmental impacts and measures for their mitigation will be undertaken. The decision on whether a quarry is appropriate will be taken at that time, based on the technical and other information available to the decision maker (currently KCC Planning Committee). However, at this time, overall, it is considered that the site is likely to be sufficiently deliverable to warrant its allocation in the Plan.

6.0 Overall Planning Balance

Introduction

6.1 Salient matters for consideration in the planning balance are set out below:

- The impact on PAWS designated land.
- Other environmental harms which might result from the development.
- The future need for Kentish Ragstone for heritage restoration purposes.
- The future need for crushed rock for aggregates purposes.
- The likely benefits of the site in respect of direct jobs and benefits to the wider economy.
- The wider benefits of the continuation of the waste management activities.

6.2 Before addressing a planning balance, it should be noted that because the majority of the site is designated as PAWS, specific planning tests must first be met before wider considerations are taken into account.

6.3 NE advice in respect of the PAWS designation provided in the context of current planning policy is:

“Given the significant direct and indirect impacts to the natural environment that the proposed nominated site at Hermitage Quarry is likely to have, we recommend that the Council should undertake a comprehensive and independent consideration of whether there are alternative sites or sources of material which will avoid or result in lesser environmental effects. This assessment should include alternative sites, including those outside of the County boundary and alternative sources such as recycled material. This assessment should include landscape, nature and geological conservation and soil considerations in addition to the socio-economic impacts.”

6.4 In light of this advice an appropriate review was undertaken, and forms part of the evidence base upon which this report, is based. Key documents are included in the list in Appendix 1.

Impact on Ancient Woodland

6.5 In order to be able to weigh the site in the planning balance for allocation or otherwise at all, it is first necessary to address the PAWS designation to which most of the proposed allocation is subject. This test has been strengthened in the NPPF since the current extension was approved in 2013. The current test is set out in para 193c of the NPPF, and states:

“When determining planning applications, local planning authorities shall apply the following principles:.....development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons⁷⁰ and a suitable compensation strategy exists.”

Footnote 70 gives examples of “wholly exceptional reasons”, going some way to define wholly exceptional reasons as follows:

“For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills) where the public benefit would clearly outweigh the loss or deterioration of habitat.”

- 6.6 KMWLP Policy DM 2 Environmental and Landscape Sites of International, National and Local Importance, states:

“Proposals for minerals and/or waste development will be required to ensure that they are not likely to cause significant harm to the integrity, character, appearance and function, biodiversity and geodiversity interests of sites of international, national and local importance, such that these proposals accord with the avoid, mitigate, compensate hierarchy...

...Minerals and/or waste proposals located within or considered likely to cause loss or deterioration of irreplaceable habitat such as Ancient Woodland and ancient or veteran trees will not be granted planning permission or identified in updates to the Minerals Sites Plan and any Waste Sites Plan unless the need for, and the benefits of the development in that location clearly outweigh any loss, justified by wholly exceptional reasons, and a suitable compensation strategy is in place.”

- 6.7 Both tests are essentially the same in respect of how the PAWS designation should be treated when development is proposed (including in respect of a Plan allocation).

- 6.8 The test has a number of aspects which should be considered as follows: Firstly, whether the development would result in the loss or deterioration of the ancient woodland or veteran trees and then secondly, are there wholly exceptional reasons for the development and is a suitable compensation strategy in place? These are considered below for the mineral working site proposed for allocation on land south and west of Hermitage Quarry.

- 6.9 Government Guidance on Ancient woodland, ancient trees and veteran trees: advice for making planning decisions (Standing Advice produced by NE and the Forestry Commission) also contains advice on the correct approach and is a material consideration for Local Planning Authorities. This states that when making planning decisions:

“You should refuse planning permission if development will result in the loss or deterioration of ancient woodland, ancient trees and veteran trees unless both of the following applies:

- there are wholly exceptional reasons*
- there’s a suitable compensation strategy in place (this must not be a part of considerations of wholly exceptional reasons)*

Ancient woodland, ancient trees and veteran trees are irreplaceable. Therefore, you should not consider proposed compensation measures as part of your assessment of the merits of the development proposal...

...You should decide on the weight given to ancient woodland and ancient and veteran trees in planning decisions on a case-by-case basis. You should do this by taking account of the NPPF and relevant development plan policies.

If you decide to grant planning permission that results in unavoidable loss or deterioration where wholly exceptional reasons are demonstrated, you should use planning conditions or obligations to make sure the developer:

- *avoids damage*
- *mitigates against damage*
- *compensates for loss or damage (use as a last resort)*

Where a proposal involves the loss or deterioration of ancient woodland or ancient or veteran trees you should not take account of the existing condition of the ancient woodland or ancient or veteran tree when you assess the merits of the development proposal. Its existing condition is not a reason to give permission for development. A woodland or tree in poor condition can be improved with good management.

Proposals can partially compensate for loss or damage of ancient woodland with measures to:

- *improve and restore plantations on ancient woodland sites*
- *improve the management of nearby ancient woodland sites and connecting them better to semi-natural habitat*
- *improve the condition of important features of ancient woodland*
- *improve access for management purposes*

Proposals can partially compensate for loss or damage to wood pasture by restoring semi-natural open habitat, managed by grazing, with open grown trees."

In light of the above the ancient woodland policy tests are considered below.

Would the development result in the loss or deterioration of the PAWS and Soils?

Method of soils translocation

- 6.10 The proposed method of soil translocation as set out by the Site Promoter is as follows:

"Sweet Chestnut Plantation would be removed, and the woodland soils within Land South and West of Hermitage Quarry would be treated as ancient. Soils would be recovered by mechanical means, drawing on the experience of work undertaken for the Westerly Extension as well as other examples nationally, including work for HS2 and other case studies discussed [in a Report Appendix]. A detailed programme of soil translocation and woodland restoration would be devised to account for the phased removal and restoration."

Assessment of Loss or Deterioration of the Soils

- 6.11 As a result of translocating the soils, disturbance would be expected to result through their mechanical excavation, loading, transportation, and deposit at the receptor site.
- 6.12 The Inspector's Report on the previous Inquiry stated:
- "The Woodland Management Plan includes the translocation of the ancient woodland soils, along with some old coppice stools and their associated bryophytes.*

They would be moved from one phase to another as part of the restoration scheme that is designed to create native woodland. With recent improvements in techniques, similar translocation schemes have been carried out elsewhere in the area and achieved reasonably good results, although time will tell if they retain those ancient woodland indicator species that have so far survived. Regardless of the relatively poor quality PAWS and the results achievable through translocation, this would not be the restoration of the PAWS lost to the scheme.” (para 16.49)

“As recorded above, there are some species of biodiversity interest in the present non-native sweet chestnut woodland. Nevertheless, restoration to native woodland should, in the longer term, considerably increase the species richness with habitat enhancement for dormice, reptiles, badgers, birds, invertebrates and amphibians, as well as greater lichen and bryophyte diversity. However, also as noted above, the ancient woodland indicator species may not translocate very well and those that did survive would be very slow to spread because of their inherently poor colonising abilities.” (para 16.60)

- 6.13 Once in place at the receptor site, the soils would be actively maintained and managed, to encourage the establishment of broad-leaved native woodland. The management of the land would be secured as a requirement of appropriate planning conditions/legal agreements attached to any future planning permission.
- 6.14 If it were concluded that there is no loss or deterioration of the soils in respect of their value as PAWS in a development scenario where the soils are translocated and actively managed for ecological benefit, when compared with the environmental baseline – then the remaining ancient woodland policy tests would not be invoked, and the site allocation would be acceptable in principle from this perspective. However, given that some deterioration in the quality of the soils will inevitably result from the translocation exercise, it is considered that this test is not met and the remaining elements of the planning policy test first need to be satisfied, specifically, are there “*wholly exceptional reasons*” which justify this, **and** “*does a suitable compensation strategy exist.*” This is considered below.

Wholly Exceptional Reasons

- 6.15 There are other potential sources of crushed rock aggregate, and the capacity of Kent’s wharf and rail infrastructure could potentially support additional imports. However, there is no clear alternative source of the Kentish Ragstone which is used as a building stone. Calls for Sites for both the previous iteration of the Plan and the current one, together with geological reports and alternative site searches conducted by the Promoter and the Council’s professional advisors (Alternative Ragstone Supplies (WSP, June 2026)) have not identified any potential alternative sources of this essential material. Without the future development of Hermitage Quarry there would therefore be no continuing suitable source of Kentish Ragstone, and there would be no source of crushed rock suitable for the majority of uses for which it is required in Kent.
- 6.16 The need for the continued extraction of Kentish Ragstone for restoration of historic buildings including UNESCO designated buildings, and the fact that no viable

alternative sources are currently known to exist is considered a wholly exceptional reason for the purposes of the policy test, and aligns with the limited examples given in Footnote 70 of the NPPF.

- 6.17 The Kentish Ragstone cannot be extracted in isolation, and relies on the associated extraction of crushed rock to facilitate this. As a result, wider benefits also result which add further weight in respect of the “*wholly exceptional reasons*” which justify the plan allocation.
- 6.18 The proposed allocation would result in a supply of approximately 23Mt of crushed rock for aggregates purposes. The minerals would be used in construction projects of benefit to wider society including for applications such as the construction of roads (including for example the Lower Thames Crossing), schools and hospitals. When taken as a whole these benefits are considered to constitute “*infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills) where the public benefit would clearly outweigh the loss or deterioration of habitat.*” as set out in NPPF footnote 70.
- 6.19 The proposed allocation would also result in benefits in respect of direct jobs protected (estimated at 140, plus indirect job opportunities arising from the estimated 400 companies associated with the local supply chain), as well as benefits to the wider economy including the skills training hub, and local supplier contracts.
- 6.20 The NPPF states that when determining planning applications ‘great weight’ should be given to the benefits of mineral extraction (para 224), including to the economy, with similar advice confirming that ‘significant weight’ should be placed on the need to support economic growth through the planning system (para 85).
- 6.21 The continued operation of the site would allow the contribution it makes to waste management and recycling in Kent to continue. The site processes CD&E wastes to produce a recycled aggregate (GAL is understood to produce approximately 250,000tpa currently but has capacity to produce up to 0.5 mtpa), and also use Air Pollution Control Residue waste from EfW plants (GAL is understood to process approximately 30,000tpa currently) mixed with quarry fines (the Hassock) to manufacture a lightweight material certified by the EA for use as a (non-waste) aggregate. The continued operation of the site would allow these functions to continue in the future. These benefits are considered to attract significant weight.
- 6.22 The continued operation of the site would also result in climate change and carbon benefits, due to removing the need to import potentially up to 23Mt of crushed rock into Kent from more remote locations. The carbon emissions from the transportation of this material would be significant, and its avoidance would accord with NPPF (para 161) in supporting the transition to net zero by 2050, and contribute to achieving radical reductions in greenhouse gas emissions. This benefit is considered to attract significant weight.
- 6.23 The continued operation of the site would allow for the continuation of the secondary aggregates manufacturing facilities, which provide material important to reduce the demand for primary minerals. Without the facility, the overall supply of

construction aggregates will reduce, and alternative sources to meet this demand will need to be found. This benefit is considered to attract significant weight.

Does a suitable compensation strategy exist?

- 6.24 When the current quarry extension was granted planning permission a very substantial package of mitigation/compensation measures were proposed. In qualitative terms this represented more than a 2:1 replacement of the area of Sweet Chestnut Plantation Woodland designated as PAWS which was lost. The compensation measures proposed previously are summarised in the table below:

Table 6.1 2013 PAWS Compensation Measures

Item	Area (ha)	Gains (cumulative, ha)
Removal of woodland to facilitate proposed development	-31	-
Native woodland restoration within application site	+33	2
New native woodland planted and managed	+26.6	28.6
Recently planted woodland to be managed	+4.3	32.9
Existing woodland to be managed	+41.8	74.7
TOTAL GAIN		74.7ha

- 6.25 In addition the formation of a 9Ha 'Habitat Creation Field' to the south-west of the site was initially proposed to receive the soil resources from early quarrying phases. A revision was made to the proposed phasing such that this soil would instead be used in the restoration of the existing quarry, and that the Habitat Creation Field would be formed at a very early stage and used principally as the site for the translocation of reptiles from the Application Site.
- 6.26 In respect of the proposed site, the Promoter has confirmed that they are willing to compensate to at least the same level of habitat creation as agreed as part of the previous permission.
- 6.27 This proposed compensation would include the following:
1. 49ha of woodland creation within the extraction area.
 2. 48ha of habitat management/creation within GAL's landownership.
 3. At least 57ha of habitat creation/management of woodland currently outside of GAL's ownership.
- 6.28 Currently point 2 includes the creation of traditional orchard and, while traditional orchards benefit biodiversity, it is not considered appropriate compensation for the

loss of PAWS. However, the Promoter has confirmed that if traditional orchard is not suitable, further off-site land can be secured at the planning application stage.

- 6.29 In addition, it is likely that there will be a need for mitigation for protected species (including birds, dormouse, reptiles and invertebrates), which would require detailed survey, mitigation and licensing through the EIA process for a planning application. As part of any future proposal it is possible the traditional orchard area could be used as part of a species mitigation strategy. Therefore, there may be a need to retain that area for use as part of wider plans for mitigation.
- 6.30 Compensation in respect of the LWS could take a similar approach to that discussed regarding PAWS ecological feature, with an emphasis on the reduction of habitat fragmentation within retained habitats, and the creation of new woodland habitats. It is unlikely that newly created habitats would be able to support a range of taxa similar to that which would be lost for a number of years. However, creating habitats years in advance of the potential loss of the LWS habitats, could potentially provide areas fauna could be translocated into prior to the commencement.
- 6.31 Overall, the proposed compensation strategy would provide gains (area/%) at least equivalent to that of the 'Westerly Extension', which was previously permitted by the Secretary of State for new native woodland and managed existing woodland. In addition, the strategy proposes a qualitative gain to be achieved by replacing non-native plantation with native woodland, The total net compensation would provide a gain of +112 hectares which consists of new native woodland planting and enhanced management of existing woodland. This excludes the 42 ha of woodland to be lost to mineral working). The total woodland creation and enhancement equate to 154 ha, which would be created compared to the 42 ha woodland (41ha of PAWS) which is assumed would be lost to facilitate mineral working. This equates to a 266% increase of native mixed species woodland (by creation and enhancement).
- 6.32 In respect of the potential Hermitage Quarry plan allocation, it is considered that the Promoter has demonstrated that the minimum area of habitat creation, restoration and/or active management required for a suitable compensation strategy can be implemented as part of any future application. Further details of the compensation strategy would be provided as part of any planning application process, in accordance with the principles included in the updated development management criteria in the Pre-Submission Draft Sites Plan. At plan making stage, a proportionate approach is required as to the level of detail needed to satisfy NPPF policy test. In principle it is considered that this would therefore represent a "suitable compensation strategy" for the proposed loss of PAWS as required by planning policy tests.

Planning Balance

- 6.33 The benefits of developing a site in this location, as set out earlier, which are considered to constitute "wholly exceptional circumstances" for the purposes of the policy tests in respect of PAWS would all weigh in favour of the allocation. However, a number of harms would also result from the proposal, which weigh against it in the

planning balance. These are addressed earlier in Section 3 of this report, and the weightings these harms are attributed in the planning balance are set out below.

- 6.34 The allocation of the site would result in the loss of a significant area of sweet chestnut coppice plantation designated as PAWS, which is considered an irreplaceable habitat under NPPF para 193(c). Although other land will be provided and managed as part of the proposed compensation strategy, the loss of this habitat is considered to attract great weight.
- 6.35 The allocation of the site is likely to result in amenity impacts, particularly as a result of blasting as the means by which the crushed rock would be recovered. However, with mitigation these adverse impacts could be managed within acceptable levels. The overall impacts in respect of amenity and health are therefore considered to attract limited weight.
- 6.36 The allocation of the site would result in minor adverse visual impacts, although the Site as a whole is relatively well screened. The overall impacts in respect of visual impact and landscape character are therefore considered to attract limited weight.
- 6.37 Hermitage Quarry has good access to the Strategic Highway Network, and although there are moderate issues with access to the Primary Route Network and Secondary Route Network, these impacts could be mitigated through planning obligations which could include a cap on HGV movements during peak traffic periods. The overall impacts in respect of highways are therefore considered to attract limited weight.
- 6.38 The site could have a minor adverse impact on groundwater SPZs or water resources in the absence of low-level mitigation, but the potential hydrogeological impacts are highly likely to be acceptably managed, when addressed through EIA. The overall impacts in respect of hydrology and hydrogeology are therefore considered to attract very limited weight.
- 6.39 There are no designated heritage assets within the proposed extension area. There are designated heritage assets around the site but nothing immediately adjacent. In terms of significant remains, there is potential for significant geo-archaeological and Palaeolithic remains (which can be managed through planning conditions), and there is also a possible 19th century shooting box, which might merit preservation *in situ*. The overall impacts in respect of archaeology and cultural heritage are therefore considered to attract moderate weight.
- 6.40 The site is near to an AQMA or may have adverse impacts on air quality, however technical assessment has shown that any impacts are likely to be possible to manage within acceptable levels. The overall impacts in respect of air quality are therefore considered to attract limited weight.
- 6.41 Small parts of the site contain best and most versatile land which would be impacted by the development. Opportunities for mitigation and restoration exist, but the land

could not be restored to the same agricultural grade. The overall impacts in respect of agricultural land, although a limited area, are therefore considered to attract moderate weight.

- 6.42 The site would impact upon Public Bridleway MR108 which runs through the site, which provides both a strategic link across the wider area, and also an important leisure route for walkers, cyclists and equestrians. There are also a number of permissive paths on the site. However, the bridleway would be subject to diversion and so the overall impacts in respect of rights of way and recreation, once properly mitigated are considered to attract limited weight.
- 6.43 While the conclusions of this report are based on the current NPPF, KMWLP 2024–39, current LAA, current SA and updated technical evidence, the Secretary of State’s Decision Letter (13 July 2013) for the Appeal on the previous extension to Hermitage Quarry, provides important context. In particular, the Secretary of State concluded that the planning benefits of the proposal as a whole “*clearly outweighed*” the adverse impacts, stating in paragraph 36:
- “The Secretary of State concludes that the proposed Westerly Extension would comply with the Development Plan, except to a limited extent in terms of landscape and tranquillity considerations. He considers that it would also prolong the limited effects on nearby residents’ amenities. However, he considers that the very considerable need for both crushed rock aggregates and dimension stone, together with the eventual biodiversity improvements, and the ongoing socioeconomic benefits, would clearly outweigh the loss of the ancient woodland and the other adverse effects of the development in this case; and therefore that the loss of ancient woodland would not be contrary to Development Plan policy.”*
- 6.44 It is important to note that the test for the acceptability of harm to PAWS designations has strengthened from a requirement that the benefits “clearly outweigh” the harm, to a requirement that “*wholly exceptional circumstances*” exist. However, his letter acknowledges that there is a “*very considerable*” need for both dimension stone and crushed rock aggregates, biodiversity improvements would result, and that the socioeconomic benefits weighed in favour of the proposed extension at that time.
- 6.45 It is considered that the overall planning considerations as summarised in this Report are broadly similar to that which existed at the time of the Secretary of State’s 2013 decision, and that the planning benefits of the current proposed extension, when taken as a whole, should be considered “*wholly exceptional circumstances*” which justify the proposed Plan Allocation.

Other ecological benefits

- 6.46 The strategy would result in ecological benefits over the retention of sweet chestnut coppice plantation, but these were excluded from the consideration of exceptional circumstances and planning balance, because in policy terms, the retention of PAWS is required in principle. The sweet chestnut plantation is dense and of lower

ecological value than native woodland as proposed in the compensation strategy, and opportunities to require the land to be managed for ecological benefit in the future will secure valuable additional habitats through progressive restoration.

- 6.47 A compensation strategy would seek to protect any ancient value in the soils and aim to deliver a significantly higher value native broadleaved woodland to replace the existing non-native monoculture. Compensation areas would be established ahead of time, such that species would not be left without habitat. The development is expected to deliver a significant net gain in area of woodland habitat.

Overall Conclusion

- 6.48 There is a very strong argument for allocation of the site on the basis of the need for Kentish Ragstone for heritage restoration purposes. This, and the other benefits that would flow from the associated extraction of the crushed rock needed to maintain a steady and adequate supply are considered to be wholly exceptional circumstances for the purposes of policy tests in relation to the PAWS designation.
- 6.49 There is also a very strong argument not to allocate the site, on the basis that it is designated as PAWS, which in planning policy terms is considered irreplaceable as a habitat and should be avoided. However, it is a significant factor that no alternative sources where suitable dimension stone could be quarried are currently known to exist, despite considerable efforts to identify these.
- 6.50 Overall, wholly exceptional reasons exist which justify the allocation of the site, sufficient information has been provided to demonstrate that a suitable compensation strategy for the PAWS lost is capable of being secured, and the planning benefits of the allocation clearly outweigh the harms in the subsequent planning balance. Allocation of the site in the plan is therefore considered to be sound based upon the current information available. However, due to the significance of the issues in respect of the preservation of PAWS and the conservation of our heritage, it is right that this is fully tested through a plan examination process. Careful thought will need to be given to further evidence and stakeholder feedback received as part of this further process, and appropriate changes made to the overall approach should these be required.

Appendix 1 – Document Reference List

- National Planning Policy Framework (as updated Feb 2025)
- [Kent Minerals and Waste Local Plan 2024-39](#)
- Inspector's Report for Appeal V/1/2158341 (11 March 2013)
- Secretary of State for Department of Communities and Local Government, Decision Letter, Hermitage Quarry, Hermitage Lane, Aylesford, Application Ref. TM/10/2158341 11.07.13
- KCC Initial (RAG) Assessment of the Suitability of Nominated Land to the South and West of Hermitage Quarry for Hard Rock (May 2023)
- Consultation Statement (Regulation 18 outcomes summary).
- Sustainability Appraisal
- Kent Local Aggregate Assessment 2025 (2015-24 data), June 2026
- GAL original response to Call for Sites with details of Land to the South and West of Hermitage Quarry
- [Draft Site Identification and Selection Methodology, September 2022](#)
- [Draft Kent Mineral Sites Plan including details of nominated hard rock site, May 2023](#)
- Nomination of Land South and West of Hermitage Quarry for Allocation - Socio-Economic Impact Assessment, BPP Consulting, June 2026
- Hermitage Quarry – Environmental Support – Ecology, WSP, June 2026
- Alternative Ragstone Supplies, WSP, June 2026
- Minerals Sites Plan: Hermitage Quarry Landscape and Visual Technical Note, WSP, June 2026
- Carbon Assessment for Potential Extension of Hermitage Quarry, WSP, June 2026
- Hermitage Quarry Air Quality Review, WSP, June 2026
- Health Impact Assessment, WSP, June 2026
- Gallagher Aggregates Limited (GAL) 'Case for Continuation' (June 2026), and its appendices:
 - A Gallagher Presentation - Introduction and Overview. Gallagher Aggregates, June 2026
 - B Aggregates Need & Supply – Planning Context. Hearnshaw Planning, January 2026
 - C Premium Limestone and Kentish Ragstone Masonry – Planning Context. Hearnshaw Planning, January 2026
 - D Gallagher Aggregates Example Markets and Projects. Gallagher Aggregates, March 2026
 - E Ecological Assessment. Ecology Solutions Limited, March 2024
 - F Biodiversity Net Gain Assessment/Hazel Dormice. Ecology Solutions Limited, March 2024
 - G Biodiversity Net Gain Assessment/Hazel Dormice. Ecology Solutions Limited, October 2024
 - H Annual Report to Management Advisory Group (Westerly Extension). Red Ecology, November 2025

Project: Kent Mineral Sites Plan

Report: Hermitage Quarry Suitability for Allocation Assessment Report

Version: Final

Date: June 2026

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- I Technical Note: Ecology Statement – Research and Case Studies. Red Ecology, February 2026
- J Wessex Archaeology – Ecology Note (Summary of reports included as Appendices K, L and U). Ecology Solutions Limited, March 2024
- K Geoarchaeological Borehole Survey Interim Report. Ecology Solutions Limited, March 2024
- L Interim Report on the Geochemical Analysis. Ecology Solutions Limited, March 2024
- M Alternative Sites Study – Kent
 - Main Document and Appendix A: Detailed Assessment for Sites (A/25&30 Pikey Lane and East Malling Heath; Site D/51-Ditton South; Site E/55-Small Profts West; Site H/94 Langley Park; Site I/101 Stoneacre Farm; Site J/106 Leeds South East; Site K/107-Burberry Lane Site O/115-Chegworth; and Dwg.GAL-HQ-23-11-B showing site locations. Hearnshaw Planning/Gallagher Aggregates, January 2024
 - Geological Information. Hearnshaw Planning/Gallagher Aggregates, February 2024
- N Qualitative Assessment of Premium Crushed Rock. Gallagher Aggregates, November 2023
- O Carbon Footprint Study for Freightng Aggregates. Carbon Footprint, January 2024
- P GHG Emissions Savings Analysis for Reduction Measures used Hermitage Quarry. Carbon Footprint, January 2024
- Q Review of Kent Planning Policies – Embodied Carbon and Sustainability Considerations. DHA Consulting, December 2023
- R Gallagher Aggregates - Social Value Overview. Gallagher Group, Collins McHugh Limited, March 2026 (Amended Apr 2026).
- S Natural Capital Report. Savills, May 2024
- T Proposed Landscape Strategy 2024 Draft. Hill-Wood and Co. April 2024
- U Archaeological Desk Based Assessment. Wessex Archaeology, March 2024
- V Transport Technical Note including Air Quality/Environmental Aspects. Stantec, December 2023
- W Services and Utilities. Feedback from communications with UK Power Networks (UKPN)
- X Initial review of proposed extension on land to the South and West of Hermitage Quarry in relation to blast vibrations. Blast Log Ltd, December 2023
- Y1 Proposed Site Allocation Plan. Gallagher Aggregates GAL-HQ-26-10
- Y2 Existing Condition Plan Gallagher Aggregates GAL-HQ-26-20 and Indicative Quarry Phasing Nos 1-4 Gallagher Aggregates GAL-HQ-26-21 to 24
- Z Hermitage Quarry – Completed Restoration Areas. Gallagher Aggregates GAL-HQ-26-06

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EQIA Submission – ID Number

Section A

EQIA Title

Kent Mineral Sites Plan

Responsible Officer

Bryan Geake - GT GC

Approved by (Note: approval of this EqIA must be completed within the EqIA App)

Sharon Thompson - GT GC

Type of Activity

Service Change

No

Service Redesign

No

Project/Programme

No

Commissioning/Procurement

No

Strategy/Policy

Strategy/Policy

Details of other Service Activity

No

Accountability and Responsibility

Directorate

Growth Environment and Transport

Responsible Service

Growth and Communities

Responsible Head of Service

Sharon Thompson - GT GC

Responsible Director

Stephanie Holt-Castle - GT GC

Aims and Objectives

The County Council is required by planning legislation to produce a development plan (commonly known as a Local Plan) for the sustainable delivery of mineral resources and the management of waste. The Kent Minerals and Waste Local Plan 2024-39 (KMWLP) was adopted in March 2025, as the full review of the Early Partial Review of the KMWLP 2013-30. This 2025 plan sets out the vision and strategy to ensure the sustainable supply of minerals and the management of waste. Both of which play an important role in sustainable communities and providing the infrastructure that society requires. Of particular consequence of the full review of the KMWLP was the finding that insufficient reserves of hard (crushed) rock aggregate are available to ensure a steady and adequate supply of this specific aggregate type to 2029.

The County Council, as plan making authority is required by the National Planning Policy Framework (NPPF) to assess whether plans are in need of updating at least once every 5 years, the Council having reviewed the KMWLP has also a responsibility to review the adopted Mineral Sites Plan 2020. This is a cojoined process of the assessment of a potential allocation for a hard (crushed) rock site in the reviewed Mineral Sites Plan to meet identified requirements to 2039. To address this matter the County Council proposes to allocate such a site with sufficient potential reserves to meet the identified hard (crushed) rock aggregate needs in the reviewed Mineral Sites Plan.

This will address national planning policy requirements, as set out in the NPPF for aggregate supply while being fully compliant with the NPPF's provisions relating to biodiversity conservation, biodiversity net gain targets (where appropriate), carbon neutrality targets and the advancement of the principle of the circular economy and overall sustainable economic growth by having a positive, proactive and flexible approach to development.

In doing so, it must be certain that the outcome of such a plan does not have inherent adverse impacts on persons with a protected characteristic. As part of the formal plan formulation process the promoted site that is now considered suitable for allocation in a plan has been the subject of a public consultation in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Section B – Evidence

Do you have data related to the protected groups of the people impacted by this activity?

Yes

It is possible to get the data in a timely and cost effective way?

Yes

Is there national evidence/data that you can use?

Yes

Have you consulted with stakeholders?

Yes

Who have you involved, consulted and engaged with?

The community had the opportunity to comment on initial changes to the Plan via a public consultation under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 conducted in June-July 2023.

The Council used a variety of communication methods as set out in the County Council's adopted Statement of Community Involvement. All relevant groups within the county were engaged without bias to any one definable group within the community as a whole. Accessible documents were available and material was available in hard copy.

In addition to local communities, all statutory consultees have been consulted; they include, where relevant:

- Parish Councils
- Kent Borough and District Councils
- Environment Agency
- Natural England
- Historic England
- Highways England
- Health and Safety Executive,
- Health Protection Agency (Public Health England)
- Campaign to Protect Rural England
- Civil Aviation Authority ((Head of Aerodromes Standards Department),
- Kent Wildlife Trust
- Gardens Trust
- Ministry of Defence
- Network Rail
- The respective water authority (e.g., South East Water)

- UK Power Networks
- Sports England
- Ramblers Association
- Mineral operators and their agents

No response to the public consultation identified an adverse impact upon those within the community with a protected characteristic.

Has there been a previous Equality Analysis (EQIA) in the last 3 years?

Yes

Do you have evidence that can help you understand the potential impact of your activity?

Yes

Section C – Impact

Who may be impacted by the activity?

Service Users/clients

No

Staff

No

Residents/Communities/Citizens

Residents/communities/citizens

Are there any positive impacts for all or any of the protected groups as a result of the activity that you are doing?

Yes

Details of Positive Impacts

It is considered that the positive impacts and the benefits of mineral development are felt on a Kent wide geographical basis, and the positive impacts are spatial to Kent, and therefore the impacts will be unlikely to be seen in relation to any identified protected group to a lesser or greater extent than the general population.

In considering the allocation of a further hard (crushed) rock site it will ensure that the required level of supply of this specific aggregate over the remaining Plan period will be maintained. This will help to ensure that the community is not subjected to impacts that would otherwise occur if greater aggregate importation were to occur, these being increased carbon loading on the wider environment and increased costs of the supply of construction materials. Moreover, in ensuring the steady and adequate local supply of aggregate minerals will facilitate the maintenance of the infrastructure and the efficient use of Kent's resources for the required new level of development to the benefit of all defined groups of the general population of Kent.

The Mineral Sites Plan is required to accord with the national planning policy requirement over the Plan's period to maintain the landbank of this specific aggregate type, thus limiting the Plan's effect on adverse anthropocentric climate change through not incurring greater carbon emissions associated with greater importation to meet construction needs, this will be to the benefit of all defined groups of the general population of Kent.

Negative impacts and Mitigating Actions

19.Negative Impacts and Mitigating actions for Age

Are there negative impacts for age?
No. Note: If Question 19a is "No", Questions 19b,c,d will state "Not Applicable" when submission goes for approval
Details of negative impacts for Age
Not Completed
Mitigating Actions for Age
Not Completed
Responsible Officer for Mitigating Actions – Age
Not Completed
20. Negative impacts and Mitigating actions for Disability
Are there negative impacts for Disability?
No. Note: If Question 20a is "No", Questions 20b,c,d will state "Not Applicable" when submission goes for approval
Details of Negative Impacts for Disability
Not Completed
Mitigating actions for Disability
Not Completed
Responsible Officer for Disability
Not Completed
21. Negative Impacts and Mitigating actions for Sex
Are there negative impacts for Sex
No. Note: If Question 21a is "No", Questions 21b,c,d will state "Not Applicable" when submission goes for approval
Details of negative impacts for Sex
Not Completed
Mitigating actions for Sex
Not Completed
Responsible Officer for Sex
Not Completed
22. Negative Impacts and Mitigating actions for Gender identity/transgender
Are there negative impacts for Gender identity/transgender
No. Note: If Question 22a is "No", Questions 22b,c,d will state "Not Applicable" when submission goes for approval
Negative impacts for Gender identity/transgender
Not Completed
Mitigating actions for Gender identity/transgender
Not Completed
Responsible Officer for mitigating actions for Gender identity/transgender
Not Completed
23. Negative impacts and Mitigating actions for Race
Are there negative impacts for Race
No. Note: If Question 23a is "No", Questions 23b,c,d will state "Not Applicable" when submission goes for approval
Negative impacts for Race
Not Completed
Mitigating actions for Race
Not Completed
Responsible Officer for mitigating actions for Race
Not Completed
24. Negative impacts and Mitigating actions for Religion and belief

Are there negative impacts for Religion and belief
No. Note: If Question 24a is "No", Questions 24b,c,d will state "Not Applicable" when submission goes for approval
Negative impacts for Religion and belief
Not Completed
Mitigating actions for Religion and belief
Not Completed
Responsible Officer for mitigating actions for Religion and Belief
Not Completed
25. Negative impacts and Mitigating actions for Sexual Orientation
Are there negative impacts for Sexual Orientation
No. Note: If Question 25a is "No", Questions 25b,c,d will state "Not Applicable" when submission goes for approval
Negative impacts for Sexual Orientation
Not Completed
Mitigating actions for Sexual Orientation
Not Completed
Responsible Officer for mitigating actions for Sexual Orientation
Not Completed
26. Negative impacts and Mitigating actions for Pregnancy and Maternity
Are there negative impacts for Pregnancy and Maternity
No. Note: If Question 26a is "No", Questions 26b,c,d will state "Not Applicable" when submission goes for approval
Negative impacts for Pregnancy and Maternity
Not Completed
Mitigating actions for Pregnancy and Maternity
Not Completed
Responsible Officer for mitigating actions for Pregnancy and Maternity
Not Completed
27. Negative impacts and Mitigating actions for Marriage and Civil Partnerships
Are there negative impacts for Marriage and Civil Partnerships
No. Note: If Question 27a is "No", Questions 27b,c,d will state "Not Applicable" when submission goes for approval
Negative impacts for Marriage and Civil Partnerships
Not Completed
Mitigating actions for Marriage and Civil Partnerships
Not Completed
Responsible Officer for Marriage and Civil Partnerships
Not Completed
28. Negative impacts and Mitigating actions for Carer's responsibilities
Are there negative impacts for Carer's responsibilities
No. Note: If Question 28a is "No", Questions 28b,c,d will state "Not Applicable" when submission goes for approval
Negative impacts for Carer's responsibilities
Not Completed
Mitigating actions for Carer's responsibilities
Not Completed
Responsible Officer for Carer's responsibilities
Not Completed

From: Peter Osborne Cabinet Member for Highways and Transport
Simon Jones, Corporate Director of Growth, Environment and Transport

To: Growth, Environment & Transport Cabinet Committee Meeting – 7th July 2026.

Subject: Procurement and award of contract/s for Soft Landscape Urban Grass, Shrubs & Hedges

Key decision – 26/00038

Classification: Unrestricted

Past Pathway of Paper: N/A

Future Pathway of Paper: Cabinet Member Decision

Electoral Division: Canterbury, Dartford, Gravesham, Maidstone, Thanet, Tonbridge and Malling, Tunbridge Wells, Sevenoaks, Swale, Folkestone and Hythe

Summary:

The Highway Urban Grass, Shrub and Hedge Maintenance Contract expire on the 28th February 2027. A new contract will be required to be procured prior to the end date. This contract will allow for the prescribed services to be delivered for an initial 60-month(5year) period with potential extensions of up to 36-months (3-years). A Key Decision is required to award the contract/s for this service as the value of the contract over the term, including optional extensions exceeds £1m.

Recommendation(s):

The Cabinet Committee is asked to consider and endorse or make recommendations to the Cabinet Member for Highways and Transport on the proposed decision as set out in Appendix A.

1. Introduction

- 1.1 The current contract (SC19071) is operating under a 13-month extension, which commenced on 1st February 2026 and will expire on 28 February 2027.
- 1.2 While the contract includes an option to extend for a further 23 months, the projected spend during this period would exceed the originally advertised and approved contract value, rendering further extension commercially and procedurally unviable.
- 1.3 There are therefore no further extension options, and a new contract is required to be in place for 1st March 2027.
- 1.4 The service is currently delivered through a two-lot geographical model:

- Lot 1 (West): formerly delivered by Countrymans Contractors Limited (SC19071/1)
 - Lot 2 (East): delivered by Sage Enviro Limited (SC19071/2)
- 1.5 However, Countrymans Contractors Limited entered into administration on 10th July 2025 and as result the services in Lot 1 have been delivered by quotations and variations to existing contracts to ensure continuity.
- 1.6 The two-lot model has provided resilience and flexibility to the service and has been validated by recent market engagement feedback.
- 1.7 The Council has a legal duty to keep roads and pavements clear of vegetation for the safe passage of highway users. In order to ensure the Council meets its statutory obligations the service will need to be re-commissioned.
- 1.8 The main service areas comprise of:
- Six Programmed Urban Grass Cutting visits
 - One Shrub bed maintenance visit
 - One Hedge maintenance visit
 - Conservation Verge and Wildflower programmed maintenance visits
 - Other programmed activities

2. Options considered and dismissed, and associated risk

2.1 Other options considered were:

- **Further extension of current contract.** Agreeing a contract extension would exceed the previously approved contract value, rendering further extension commercially and procedurally unviable.
- **Allow contracts to elapse and not procure and award new contracts.** This would mean KCC would not be meeting its legal duty to keep roads and pavements clear of vegetation to maintain safe passage for highways users.
- **Procure on a countywide basis.** This would discriminate against SME's and reduce resilience.
- **Procure on multiple lots.** This approach has a higher risk of best value not being achieved.

3. Procurement Strategy

3.1 To obtain a greater understanding of the market, the service team undertook a Market Engagement exercise in November 2025. A preliminary Market Engagement Notice was published on the 27th of November 2025, with a Market engagement Questionnaire released on the Kent Business Portal

3.2 Key points drawn from the market engagement were:

- Contractors are familiar with the specification and scope of works
- The contract size is suitable and accessible for SMEs

- A five-year initial term is preferred
 - The current 2 lot arrangement was seen positively by the majority of contractors.
 - Two lots provide better value for money, as smaller lots would not attract sufficient market interest due to low spend
- 3.3 To ensure resilience within the contracts and to meet market requirements it is proposed therefore to award two separate contracts within the east and west of the County with an initial term of 5 years with the option to extend up to 3 years.
- 3.4 Any decision to extend the contract will be linked to performance and contract compliance.
- 3.5 The proposed lot structure is:
- **Lot 1 (West)** – Dartford, Gravesham, Sevenoaks, Tonbridge & Malling and Tunbridge Wells
 - **Lot 2 (East)** – Maidstone, Swale, Canterbury and Thanet, Folkestone and Hythe
- 3.6 This service in Dover and Ashford is currently delivered by the District Councils. The contract will include provisions to incorporate these areas should service delivery arrangements change during the contract term.
- 3.7 To ensure the Council achieves best value while providing tenderers with clarity regarding contract terms and duration, it is proposed that the contract is divided into two lots.
- 3.8 There will be opportunities to review and refine the tender to accommodate Local Government Reorganisation changes where possible. Additionally, specific contractual clauses will be included to address Local Government Reorganisation, enabling future service restructuring while maintaining service resilience.
- 3.9 The Selection Questionnaire stage has been completed and those companies that passed the minimum threshold have been sent the invitation to tender (ITT). The procurement timetable is as follows:

Task	Date
ITT Period	29 th June 2026 – 14 th August 2026
ITT – Mid Bid reviews	July 2026
ITT Evaluation / Moderation	17 th August 2026 – 28 th August 2026
Tender Clarification Meetings	2 nd September 2026 – 18 th September 2026
Invitation to Submit Final Tenders (ISFT)	5 th October 2026 – 16 th October 2026
Contract award, internal governance, standstill period, notices etc...	2 nd November 2026 – 20 th November 2026
Mobilisation period	30 th November 2026 onwards (3 months)
Contract start	1 st March 2027

4. Financial Implications

- 4.1 Contracts have been linked to the GM87 indices over the course of the contract, so prices have kept pace with inflation. A competitive procurement process will be undertaken, with the contract(s) awarded to the Most Advantageous Tender.
- 4.2 The overall spend on this contract for programmed works is estimated at £15.23m over the course of the contract or £1.91m per year. This spend is currently funded through the highway's soft landscape revenue budget.

To allow for inflation, ad-hoc works, potential service transfers from District Councils, increases in workload and the varying nature of services, the published contract value will be set at £22.5 million over the life of the contract. This provides necessary contractual and governance headroom to manage change and support contract longevity, reducing the risk of early termination due to value constraints.

- 4.3 The funding for this work is contained within the revenue budget of the Highways Asset Management - Soft Landscaping team. Until such time as tender prices are returned it is unknown if there will be any pressure on this budget.

5. Legal implications

- 5.1 The Council has a legal duty to keep roads and pavements clear of vegetation for safe passage of highway users.
- 5.2 This contract allows the Council to minimise its liabilities in relation to claims.
- 5.3 The award of any contracts will be in full compliance with all relevant procurement regulation.
- 5.4 Contract provisions will include novation and variation clauses to enable flexibility in response to Local Government Reorganisation.

6. Equalities implications

- 6.1 An Equalities Impact Assessment has been carried out, and no implications have been identified at this early stage. This will be continually reviewed as the programme continues and has been attached in Appendix B.
- 6.2 The initial screening identified that a Data Projection Impact Assessment will not be necessary as no personal data is collected for this commission.

7. Policy Framework

- 6.1 The procurement of the Highway Urban Grass, Shrub and Hedge Maintenance Contract aligns with the Reforming Kent Strategic Statement by delivering a safe, resident-focused frontline service, supporting efficient and financially sustainable operations, enhancing local environments and biodiversity, and

ensuring long-term resilience and value for money within KCC's statutory highway responsibilities.

6.2 This commission is detailed within the following plans:

- Highways and Transportation Operational Delivery Plan 26/27

8. Other corporate implications

8.1 The decision to award contracts for the maintenance of urban grass, shrubs and hedges has no significant impact in other areas of the Council's work.

9. Conclusions

9.1 The Highway Urban Grass, Shrub and Hedge service is essential to the Council's statutory highway maintenance responsibilities.

9.2 The Highway Urban Grass, Shrub and Hedge contract ends on 28 February 2027 and so a new contract will need to be in place to ensure uninterrupted service delivery.

9. Recommendation:

The Cabinet Committee is asked to consider and endorse or make recommendations to the Cabinet Member for Highways and Transport on the proposed decision as set out in Appendix A.

10. Background Documents

Appendix A – Record of Decision

Appendix B – Equalities Impact Assessment

11. Contact details

Report Authors: Helen Rowe Interim Head of Highways (Assets) 03000 413971 helen.rowe@kent.gov.uk Robin Hadley Soft Landscape Asset Manager 03000 413647 robin.hadley@kent.gov.uk	Relevant Director: Andrew Loosemore Director of Highways and Transport 03000 411652 Andrew.loosemore@kent.gov.uk

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KENT COUNTY COUNCIL – PROPOSED RECORD OF DECISION

DECISION TO BE TAKEN BY:

Peter Osborne, Cabinet Member for Highways and Transport

DECISION NUMBER:

26-00038

Executive Decision – Key**26-00038 – Procurement and award of contract(s) for Soft Landscape
Urban Grass, Shrubs & Hedges**

Decision:

As Cabinet Member for Highways & Transport, I agree to:

1. **APPROVAL** to procure and award a new Highways Urban Grass, Shrubs and Hedges Maintenance contract for up to five years with an opportunity to extend this for up to three further years,
 2. **DELEGATE** authority to the Director of Highways and Transport to take relevant actions to facilitate the required procurement activity,
 3. **DELEGATE** authority to the Corporate Director of Growth, Environment and Transport, in consultation with the Cabinet Member for Highways and Transport to take relevant actions including but not limited to awarding, finalising the terms of and entering into the relevant contracts or other legal agreements, as necessary, to implement the decision and
 4. **DELEGATE** authority to the Corporate Director of Growth, Environment and Transport, in consultation with the Cabinet Member for Highways and Transport, to award extensions of the contract in accordance with the relevant clauses within the contract.
-

Reasons for decision:

The Council has a statutory duty to maintain a safe highway for all users, which includes ensuring highway vegetation does not cause a hazard or obstruction for motorists and pedestrians.

To ensure this duty is met, the Soft Landscape Highways Team have in place the Highways Urban Grass, Shrubs & Hedges Maintenance Contract. The service is currently split across the county into 2 lots: Lot 1 – West & Lot 2 – East.

At present, these services are covered under existing contractual arrangements, which expire in February 2027. The services will need to be commissioned externally to ensure the Council meets its statutory obligations.

Financial implications:

The proposed contract term is 5 years with the option to extend for up to a further 3 years.

The overall spend for this contract for programmed works is estimated at £15.23 million over the contracts full term, equating to £1.91 million per year. This spend is currently funded through the highway's soft landscape revenue budget which allowing for future inflation, will be sufficient.

Due to uncertainty around inflationary pressures, ad hoc works, potential service transfers from District Councils, and possible increases in contract throughput, the published contract value will be set at £22.5 million over the life of the contract, including optional extensions.

Legal implications:

The Council has a legal duty to keep roads and pavements clear of vegetation for safe passage of highway users. The award of any contracts will be in full compliance with all relevant procurement regulation.

Equalities implications:

An Equalities Impact Assessment has been carried out, and no implications have been identified at this early stage.

Data Protection implications:

There is no processing of personal data carried out as part of this contract therefore no DPIA has been carried out.

Cabinet Committee recommendations and other consultation:

The proposed decision is being considered by Members of the Growth, Environment and Transport Cabinet Committee at their meeting on 7th July.

Any alternatives considered and rejected:

- **Further extension of current contract.** Agreeing a contract extension would exceed the previously approved contract value, rendering further extension commercially and procedurally unviable.
- **Allow contracts to elapse and not procure and award new contracts.** This would mean KCC would not be meeting its legal duty to keep roads and pavements clear of vegetation to maintain safe passage for highways users.
- **Procure on a countywide basis.** This would discriminate against SME's and reduce resilience.
- **Procure on multiple lots.** This approach has a higher risk of best value not being achieved.

Any interest declared when the decision was taken and any dispensation granted by the Proper Officer:

.....
Signed

.....
Date

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EQIA Submission – ID Number

Section A

EQIA Title

Highway Urban Grass Shrub and Hedge Maintenance Contract Ref CN250567

Responsible Officer

Robin Hadley - GT TRA

Approved by (Note: approval of this EqIA must be completed within the EqIA App)

Helen Rowe - GT TRA

Type of Activity

Service Change

No

Service Redesign

No

Project/Programme

No

Commissioning/Procurement

Commissioning/Procurement

Strategy/Policy

No

Details of other Service Activity

No

Accountability and Responsibility

Directorate

Growth Environment and Transport

Responsible Service

Highways

Responsible Head of Service

Helen Rowe - GT TRA

Responsible Director

Andrew Loosemore - GT TRA

Aims and Objectives

The Council has a legal duty to keep roads and pavements clear of vegetation for the safe passage of highway users. The main service areas comprise of urban grass, shrub and hedge cutting to contribute to visual amenity.

The main activities required under this contract comprise:

- Six Programmed Urban Grass Cutting visits
- One Shrub bed maintenance visit
- One Hedge maintenance visit
- Conservation Verge and Wildflower programmed maintenance visits
- Other programmed activities

The Urban Grass, Shrub & Hedge maintenance provision is required to meet a 'Duty of Care' to highway users and comply with the Highways Act 1980. It minimises liabilities to highway users, property and infrastructure.

It contributes to KCC's strategic objectives through:

1. Fewer people killed or seriously injured on Kent's roads.
2. Customer satisfaction by providing 'the right services in the right way for the right people'
3. Cost effective statutory and discretionary services by commissioning well and being commercially astute.
4. Growth and economic prosperity through an efficient highway and transport infrastructure.
5. People can travel safely, efficiently and pleasantly to employment, education, social and cultural opportunities.
6. Maximising lifespan and minimising lifecycle costs of the highway and its assets and improving maintainability by embedding asset management principles into everything we do
7. Maximise inward investment into Kent.
8. Retaining a motivated workforce with high levels of job satisfaction.

The overall aim of the procurement is to guarantee service delivery and continue to meet KCC's obligations as the Highway Authority with sound grounding in asset management principals.

H&T delivers services that are used by most, if not all, residents in Kent and those who travel through it.

Our primary focus is to ensure everyone can travel as safely as possible on our highway network.

The intended beneficiaries are the travelling public in Kent such as residents, communities and businesses, now and in the future as the highway infrastructure is maintained to a safe standard and improved wherever possible.

Outcome

- No major change - no potential for discrimination and all opportunities to promote equality have been taken. I have found the Adverse Equality Impact Rating to be: Low

Section B – Evidence

Do you have data related to the protected groups of the people impacted by this activity?

Yes

It is possible to get the data in a timely and cost effective way?

Yes

Is there national evidence/data that you can use?

No

Have you consulted with stakeholders?

Not Applicable

Who have you involved, consulted and engaged with?

The service being procured is for compliance with Kent County Council's 'Duty of Care' to highway users and Statutory obligation under the Highways Act 1980.

Information relating to the potential impact of the works are contained in the Highways Customer Service Module(CSM) where all enquiries relating to the service have been logged since the early 2000's.

Has there been a previous Equality Analysis (EQIA) in the last 3 years?

No

Do you have evidence that can help you understand the potential impact of your activity?

Yes

Section C – Impact

Who may be impacted by the activity?

Service Users/clients

Service users/clients

Staff

Staff/Volunteers

Residents/Communities/Citizens

Residents/communities/citizens

Are there any positive impacts for all or any of the protected groups as a result of the activity that you

are doing?
Yes
Details of Positive Impacts
The positive effects of maintaining the asset impact the whole population.
Positive impacts include:
1. Unrestricted access for protected characteristics of age and disability
2. Increased Highway safety for all groups as a result of less trip hazards/obstructions/visibility issues
3. Increased biodiversity for all groups through the management of roadside nature reserves
4. Highway infrastructure/assets not degraded by soft landscape asset resulting in a safer highway which provides positive impacts for all groups. (streetlights/signage/visibility/street cleansing)
Negative impacts and Mitigating Actions
19. Negative Impacts and Mitigating actions for Age
Are there negative impacts for age?
No
Details of negative impacts for Age
Not Applicable
Mitigating Actions for Age
Not Applicable
Responsible Officer for Mitigating Actions – Age
Not Applicable
20. Negative impacts and Mitigating actions for Disability
Are there negative impacts for Disability?
No
Details of Negative Impacts for Disability
Not Applicable
Mitigating actions for Disability
Not Applicable
Responsible Officer for Disability
Not Applicable
21. Negative Impacts and Mitigating actions for Sex
Are there negative impacts for Sex
No
Details of negative impacts for Sex
Not Applicable
Mitigating actions for Sex
Not Applicable
Responsible Officer for Sex
Not Applicable
22. Negative Impacts and Mitigating actions for Gender identity/transgender
Are there negative impacts for Gender identity/transgender
No
Negative impacts for Gender identity/transgender
Not Applicable
Mitigating actions for Gender identity/transgender

Not Applicable
Responsible Officer for mitigating actions for Gender identity/transgender
Not Applicable
23. Negative impacts and Mitigating actions for Race
Are there negative impacts for Race
No
Negative impacts for Race
Not Applicable
Mitigating actions for Race
Not Applicable
Responsible Officer for mitigating actions for Race
Not Applicable
24. Negative impacts and Mitigating actions for Religion and belief
Are there negative impacts for Religion and belief
No
Negative impacts for Religion and belief
Not Applicable
Mitigating actions for Religion and belief
Not Applicable
Responsible Officer for mitigating actions for Religion and Belief
Not Applicable
25. Negative impacts and Mitigating actions for Sexual Orientation
Are there negative impacts for Sexual Orientation
No
Negative impacts for Sexual Orientation
Not Applicable
Mitigating actions for Sexual Orientation
Not Applicable
Responsible Officer for mitigating actions for Sexual Orientation
Not Applicable
26. Negative impacts and Mitigating actions for Pregnancy and Maternity
Are there negative impacts for Pregnancy and Maternity
No
Negative impacts for Pregnancy and Maternity
Not Applicable
Mitigating actions for Pregnancy and Maternity
Not Applicable
Responsible Officer for mitigating actions for Pregnancy and Maternity
Not Applicable
27. Negative impacts and Mitigating actions for Marriage and Civil Partnerships
Are there negative impacts for Marriage and Civil Partnerships
No
Negative impacts for Marriage and Civil Partnerships
Not Applicable
Mitigating actions for Marriage and Civil Partnerships
Not Applicable
Responsible Officer for Marriage and Civil Partnerships
Not Applicable
28. Negative impacts and Mitigating actions for Carer's responsibilities
Are there negative impacts for Carer's responsibilities

No
Negative impacts for Carer's responsibilities
Not Applicable
Mitigating actions for Carer's responsibilities
Not Applicable
Responsible Officer for Carer's responsibilities
Not Applicable

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From: Peter Osborne, Cabinet Member for Highways and Transport
Simon Jones, Corporate Director for Growth, Environment and Transport

To: Growth, Environment and Transport Cabinet Committee - 7 July

Subject: Decision Number: 26/00035 Dover Border Access Improvement Project

Key decision: Yes

Classification: Part 1 – Main Report - Unrestricted
Part 2 – Exempt (Appendices C and D) – Section 12A of the Local Government Act paragraphs 3 and 5.

Past Pathway of report: None

Future Pathway of report: Cabinet Member Decision

Electoral Division: Dover Town – James Defriend
Dover Town – Albert Thorp

Is the decision eligible for call-in - Yes

Summary: The Dover Border Access Improvement Project (DBAIP) aims to deliver improved capacity and sequencing of the outbound border controls for traffic headed to Europe through the juxta-posed border. The benefit of the project is the potential reduced requirement for traffic management on the highway network external to the Port. This will help support local journeys, the quality of life for residents and support local businesses and the visitor economy. The project will be funded by a government grant once government makes a final decision, made to Kent County Council from the Levelling Up Fund and provided as a subsidy to Dover Harbour Board who will also contribute their own investment towards total project costs.

Recommendation(s):

The Cabinet Committee is asked to consider and endorse or make recommendations to the Cabinet Member for Highways and Transport on the proposed decision as set out in Appendix A.

1. Introduction

- 1.1 Kent County Council (KCC) submitted a successful bid in August 2022 to the Levelling Up Fund round 2 (LUF2), for the purpose of improving Port of Dover border controls to reduce on-highway congestion, queuing and the need for traffic management. Details on the basis for that bid were provided to the Environment and Transport Cabinet Committee (ETCC) in September 2022. The proposal is known as the Dover Border Access Improvement Project

(DBAIP), having previously been reported to ETCC under the name “Dover Access Improvements”.

- 1.2 The proposal is seeking to utilise a £20m grant from the Levelling Up Fund (LUF) to support delivery of the project that will be constructed by the Port of Dover’s contractors. The remainder of project cost further to the grant will be met by the Dover Harbour Board. The LUF grant funding was originally planned to be provided to KCC at the beginning of the 2025/26 financial year, however this was delayed whilst further project design and development occurred.
- 1.3 Dover District is classed as a Level 1 (1 being the highest rating for need) Priority Area in the Levelling Up Fund. In January 2023 the government announced that the bid had been successful with funding allocated to the project subject to business case development and due diligence.
- 1.4 Since January 2023, the Dover Harbour Board developed the detail of the proposed changes within the Port and has worked with KCC to develop the business case for those. Following completion of government departmental assurance processes, it will take a final decision to award the funding to KCC to enable the Port to complete design, procurement and deliver the scheme.
- 1.5 The decision will be implemented if the DfT takes a final decision at board level to award the grant and enter a funding agreement with KCC and the Dover Harbour Board. This will require DfT to make a final decision at a ministerial level. This will then enable KCC to receive funding from the DfT and manage the release of funds to the Dover Harbour Board based upon the roles, responsibilities and governance processes established in the Grant Funding Agreement.

2. Purpose of the Dover Border Access Improvement Project

- 2.1 The Dover Border Access Improvement Project (DBAIP) aims to deliver a series of improvements to border infrastructure to fulfil the objectives below.
 - 2.1.1 Increased Port Capacity: Providing more space for vehicles held within the Port will reduce the number of vehicles required to wait on the external road network.
 - 2.1.2 Increased Port Throughput: Speeding up the overall throughput in the Port will allow more vehicles to be processed each hour, this will mean queues take longer to build and can be cleared faster.
 - 2.1.3 Meeting Border Regulations: The outbound control checks at the Port currently do not meet the requirements of the Treaty of Le Touquet and an exceptional arrangement is in place. The project will mean that the Treaty obligations are fully met by the UK.
- 2.2 The project's impact on traffic throughput at the Port aims to enable a reduced likelihood of traffic management such as the Dover Traffic Access Protocol (TAP) and some incidence of Operation Brock. It should be noted however, that given the volume of traffic that uses the Port and other potential external factors that can affect traffic throughput (such as strikes, adverse weather in the Channel etc), this project may not eradicate the need for traffic management controls. For these more extreme events, the resilience of the network should nonetheless increase due to the project, potentially reducing the duration of TAP and Brock if they do occur and therefore reducing delays for vehicles headed to Europe.
- 2.3 The business case sets out a clear range of benefits arising from the reduced traffic disruption. Substantial quantified and qualitative evidence has been collected over time that enables conclusions that the DBAIP has a strong potential to improve journeys to essential services, both for private and public transport.
- 2.4 Harm to the visitor economy from travel disruption could be reduced, helping visitors to have an easier, less disrupted journey to Dover. Local journeys within Dover and the east Kent area would also benefit, helping to reduce delay and ensure that people can get to their jobs, appointments, schools on time. The local economy should therefore be able to benefit from this project, better functioning to serve local customers and trade. Negative environmental impacts associated with congestion should also be reduced and the cost of running Operation Brock could also fall as if it is activated less.
- 2.5 The benefits of the project mean it can help deliver against the Levelling Up Fund key focus areas of boosting productivity, pay, jobs and living standards; spreading opportunities and improving public services; and restoring a sense of community, local pride and belonging.

3. Delivering the Dover Border Access Improvement Project

- 3.1 The planned improvement works to border infrastructure and routing pathways for vehicles through the Port can all be undertaken within the Port of Dover estate with no need for planning permission and will be managed and contracted out by the Dover Harbour Board. The Dover Harbour Board anticipates that much of the work can be undertaken offline from the existing operational environment which should minimise disruption during construction. The time frame for delivering the works is estimated to be a three year construction programme.
- 3.2 KCC's role in the DBAIP is owing to the government's Levelling Up Fund criteria at the time of bidding in 2022 – specifically, those criteria allowed only Local Transport Authorities, such as KCC, to bid for transport proposals up to a value of £50m. As the bidding authority and in keeping with the Levelling Up Fund mechanism, the DfT requires that funding must be awarded to KCC who will take responsibility for commissioning the Dover Harbour Board to fulfil the objectives of the investment.
- 3.3 This will therefore require KCC to enter into a tripartite agreement with both the DfT and the Dover Harbour Board, with the Dover Harbour Board effectively the supplier to KCC (who will act as client) for the delivery of the project. The DfT are party to the agreement due to the need to establish conditions for the drawdown of funding by KCC, reporting requirements to it by KCC and the Dover Harbour Board, and to retain government oversight and assurance over how its funding is used through governance mechanisms set out in the agreement.

4. Options considered and dismissed

- 4.1 The possibility for awarding the grant directly to the Dover Harbour Board was considered; however, as set out in paragraph 4.2 above, due to the conditions for Levelling-Up Funding and precedents set with other awards across the country, the DfT requires that the grant be paid to the bidding authority.
- 4.2 The option not to progress the project following the successful bid was also discarded due to the significant benefits the project will deliver locally and nationally. Additionally, there is no match funding required from KCC as the investment from DfT and the Dover Harbour Board is sufficient to deliver the project.

5. Financial Implications

- 5.1 KCC will not provide any additional funding to the project aside from the grant received from DfT. The Port takes all risk and financial liability on any increase in cost over the budget of the proposal.
- 5.2 No spend of the grant funding will be incurred until Dover Harbour Board have completed a series of commencement conditions specified within the Grant Funding Agreement. Once conditions have been met, Dover Harbour Board will

be able to claim cost reimbursement, subject to evidence. No more than 90% of the grant will be payable until the project is completed and no more than 48.19% of the total project cost will be covered by the grant where the cost of the project falls below the estimated total cost.

- 5.3 KCC's role, specified in the Grant Funding Agreement is for administrating and managing the claims process for Dover Harbour Board to receive reimbursement for cost of works. Costs to KCC for providing this role will be claimed from a 'Council Administration Sum', additional to the £20m Grant. The agreement specifies that this sum will be £405,000 and was determined based on an estimate of time and resources KCC would need to spend, building in contingency including for inflation in resource costs and rates.
- 5.4 KCC will therefore be at risk for costs of administrating the grant exceeding what funding it receives from DfT to undertake that role. This risk is considered to be very low owing to the current forecast of costs, supplier quotes to KCC for supporting it in its role, the additional Levelling Up Fund capacity and capability funding KCC received for 2026/27 and 2027/28 (sums of £78,692 and £62,500 respectively) and the contingency available. Furthermore, DfT have provided written assurances that it would lead activity on particular matters which may further mitigate the costs to KCC.
- 5.5 In the event that the DfT has reason to recover spend from the Port, KCC will not be obliged to pay any of the £20m funding back to DfT until it is in receipt of it from the Port. This ensures that KCC would not be in financial deficit on the grant award due to its role in the funding of the scheme.
- 5.6 The current forecast profile of grant to be received by KCC is shown in the table below. The expected spend profile will be established at completion of the pre-commencement conditions as part of the Dover Harbour Board's cost plan.

Year	2026/27	2027/28	Total
Grant fund forecast (£k)	£10m	£10m	£20m

- 5.7 KCC's previous work has been covered by previous Levelling Up Fund capability and capacity grants.

6. Legal implications

- 6.1 Owing to the set up of the Levelling Up Fund, which awards funding to local authorities to level up their communities, KCC is required to be the recipient of the grant funding from government. KCC will commission the Dover Harbour Board to implement the project at the Port of Dover. KCC must sign a tripartite Grant Funding Agreement with the DfT and the Dover Harbour Board to secure and defray the grant.
- 6.2 Given the Levelling Up Fund grant constitutes a subsidy under the Subsidy Control Act 2022, it has been subject to an assessment considering how it is consistent with the subsidy control principles within the Act. A decision by KCC to sign the agreement will therefore be a decision (along with the government who will also be party to the agreement and be providing the subsidy) that the

subsidy complies with the Act's subsidy control principles. KCC's summary of the assessment sets out that it has concluded that the proposed subsidy would be compliant with the control principles of the Act. KCC's summary is contained in Appendix C which is exempt from disclosure under LGA 72 Schedule 12A paragraph 3.

- 6.3 KCC officers have taken legal advice concerning the Grant Funding Agreement and planned subsidy, the detail of which is contained in Appendix D which is exempt from disclosure under LGA 72 Schedule 12A paragraph 5.
- 6.4 KCC is subject to the Public Sector Equality Duty (PSED) under the Equality Act 2010 and must actively consider how its decisions and services affect people with protected characteristics. The implications are covered in section 7.

7. Equalities implications

- 7.1 An Equality Impact Assessment (attached as Appendix B) was carried out to assure KCC that its public sector equality duty could be fulfilled. The assessment indicates that 'there are no concerns at this stage which indicate the possibility of inequalities or negative impacts'. No key issues were found in the assessment and therefore no mitigation has been included.

8. Governance

- 8.1 KCC has agreed with the Department for Transport and Dover Harbour Board a governance structure. KCC will provide audit and assurance of expense claims by the Dover Harbour Board.
- 8.2 The Dover Harbour Board will project manage the remaining design, procurement and contracting of construction of the project, reporting to a KCC programme board on a regular basis, with the opportunity for escalation to a Project Board which the DfT will sit on. This will enable KCC to monitor progress, evaluate outcomes, and agree with the Dover Harbour Board any necessary change control or issues escalation to the Project Board.

9. Conclusions

- 9.1 Completion of the Key Decision will secure a large and transformative investment in the Port of Dover to deliver our aim for reduced highways disruption associated with international traffic flows and to support the levelling up of Kent. A more resilient road network that enables less disruption to both local journeys and cross-border traffic. The scale of the benefits, the assurances concerning the immediate financial risks associated with administering the commission and defrayment of funds to the Dover Harbour Board have been considered. The funding award, which will constitute a subsidy, has been determined as compliant with the Subsidy Control Principles of the Subsidy Control Act 2022.

10. Recommendation(s)

The Cabinet Committee is asked to consider and endorse or make recommendations to the Cabinet Member for Highways and Transport on the proposed decision as set out in Appendix A.

11. Background Documents

9.2 The following background documents are included as Appendices to this report:

Appendix A: Record of Decision

Appendix B: Equalities Impact Assessment

Appendix C: KCC Summary of Subsidy Assessment - **Exempt**

Appendix D: Legal advice concerning subsidy award and funding agreement - **Exempt**

12. Contact details

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Relevant Director:

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Director of Highways and Transportation

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KENT COUNTY COUNCIL – PROPOSED RECORD OF DECISION

DECISION TAKEN BY:

Peter Osborne, Cabinet Member for Highways and Transport

DECISION NO:

26-00035

For publication *[Do not include information which is exempt from publication under schedule 12a of the Local Government Act 1972]*

Key decision: YES / NO

- Expenditure over £1m
- Significant in terms of its effects on a significant proportion of the community living or working within two or more electoral divisions

Subject Matter / Title of Decision

Dover Border Access Improvement Project (DBAIP)

Decision:

The Cabinet Member for Highways and Transport agree, subject to the Department for Transport (DfT) confirming the grant funding agreement to:

- APPROVE the acceptance of £20m DfT grant funding for the Dover Border Access Improvement Project and entering into necessary arrangements to facilitate and support the Dover Border Access Improvement Project;
- APPROVE entry into the required funding agreement with the Department for Transport and Dover Harbour Board for the receipt, management and deployment of central government grant funding, constituting a subsidy under the Subsidy Control Act 2022, of £20m for the implementation of the Dover Border Access Improvement Project
- DELEGATE authority to the Corporate Director of Growth, Environment & Transport to take relevant actions, including but not limited to negotiating, finalising and entering into contracts and other legal agreements, as necessary to implement the decision.

Reason(s) for decision:

The decision is needed to deliver improvements for Dover constituents and any others more widely impacted by traffic management associated with the Port of Dover, by obtaining Levelling Up Funding to increase capacity and throughput of the Port, and by ensuring it meets border regulations.

DfT is providing the grant funding for the Dover Border Access Improvement Project, and its decision-making process has completed so that funds can be awarded to KCC.

Background

Dover is a Levelling Up Fund priority 1 area – the highest classification in the UK. Kent County Council (KCC) as the Local Transport Authority bid for funding in 2022, with an award announced by government in January 2023, subject to business case and subsidy assessment.

While the grant was provisionally proposed at £45m, we have – working with DfT and Port of Dover – established that similar benefits can now be achieved with a significantly reduced grant of £20m. This saving of public money has been enabled by: (i) leveraging the benefits of the extensive work

which the port (aided by central government) has undertaken to prepare for the EU Entry/Exit System including the extensive redevelopment of the Western Docks and (ii) significant development of the proposals by the port aimed at substantially reducing costs more generally in several areas.

The scheme is designed to add capacity and throughput in the Port which could reduce the need for Dover TAP and Brock by up to 80% and thereby remove congestion on the public highway network. This will support the resilience of the Kent transport network and be a positive outcome for the wider economy.

The decision will be implemented once the government takes a final decision to award the grant and enter a funding agreement with KCC and the Dover Harbour Board. This will then enable KCC to receive funding from the DfT and manage the release of funds based upon the roles, responsibilities and governance processes established in the Grant Funding Agreement.

How the proposed decision supports the Council Strategy Reforming Kent 2025-2028

Objective 3: Seek fair funding from Government which properly recognises Kent's unique needs.

This objective specifically cites the pressure of international Heavy Goods Vehicle (HGV) traffic on the Kent road network as one of the unique needs of the county. Securing the Levelling Up Fund (LUF) grant will represent a success in securing further funding to address this challenge in Kent.

Objective 5: Support local businesses to attract investment and create job opportunities for people in Kent.

This objective specifically cites the ambition to support projects such as the Port of Dover 2050 masterplan. The Dover Board Access Improvement Project (DBAIP) project seeks to use LUF grant funds to guarantee and accelerate delivery of improvements the Dover Harbour Board has set out to deliver over the longer term as part of its masterplan. This will help to reduce the negative externalities created by the Port which will help to attract investment and create job opportunities in Kent, especially in Dover which experiences the most acute impacts of traffic congestion due to queues extending out of the Port.

Financial Implications

The decision will release £20m to KCC from the government.

The £20m is the limit of the funding the government and KCC will release to Dover Harbour Board per the terms of the Grant Funding Agreement.

The Grant Funding Agreement will absolve KCC of any financial liability with respect to Dover Harbour Board's undertaking.

As the accountable body, KCC will carry limited liabilities to the DfT should KCC commit an Event of Default per the Grant Funding Agreement.

KCC will receive funding of £405,000 from the DfT to support its administration costs of the grant, in addition to LUF capability and capacity grant funding of £78,692 in 2026/27 and £62,500 in 2027/28. Officers consider this funding sufficient to cover KCC's likely costs.

The Dover Harbour Board will provide funding for the remaining investment necessary to deliver the project.

Legal Implications

Owing to the set up of the Levelling Up Fund, which awards funding to local authorities to level up their communities, KCC is required to be the recipient of the grant funding from government. KCC will commission the Dover Harbour Board to implement the project at the Port of Dover. KCC must sign a tripartite Grant Funding Agreement with the DfT and the Dover Harbour Board to secure and defray the grant.

Given the Levelling Up Fund grant constitutes a subsidy under the Subsidy Control Act 2022, it has been subject to an assessment considering how it is consistent with the subsidy control principles within the Act. A decision by KCC to sign the agreement will therefore be a decision (along with the government who will also be party to the agreement and be providing the subsidy) that the subsidy complies with the Act's subsidy control principles. KCC's summary of the assessment sets out that it has concluded that the proposed subsidy would be compliant with the control principles of the Act. KCC's summary is contained in Appendix C which is exempt from disclosure under LGA 72 Schedule 12A paragraph 3.

KCC officers have taken legal advice concerning the Grant Funding Agreement and planned subsidy, the detail of which is contained in Appendix D which is exempt from disclosure under LGA 72 Schedule 12A paragraph 5.

KCC is subject to the Public Sector Equality Duty (PSED) under the Equality Act 2010 and must actively consider how its decisions and services affect people with protected characteristics..

Equalities implications

An Equality Impact Assessment (attached as Appendix B) was carried out to assure KCC that its public sector equality duty could be fulfilled. The assessment indicates that 'there are no concerns at this stage which indicate the possibility of inequalities or negative impacts. No key issues were found in the assessment and therefore no mitigation has been included.

Cabinet Committee recommendations and other consultation:

[TBC]

Any alternatives considered and rejected:

The possibility for awarding the grant directly to the Dover Harbour Board was considered; however, due to the conditions for Levelling-Up Funding and precedents set with other awards across the country, the DfT requires that the grant be paid to the bidding authority.

The option not to progress the project following the successful bid was also discarded due to the significant benefits the project will deliver locally and nationally. Additionally, there is no match funding required from KCC as the investment from DfT and the Dover Harbour Board is sufficient to deliver the project.

Any interest declared when the decision was taken and any dispensation granted by the Proper Officer: [TBC]

.....
signed

.....
date

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**Kent County Council
Equality Impact Assessment (EqIA)**

Directorate/ Service: Transportation in Highways, Transport and Waste

Name of decision, policy, procedure, project or service: Kent County Council's decision to accept Levelling Up Funding for the Dover Border Access Improvement Project (DBAIP).

Responsible Owner/ Senior Officer: Joseph Ratcliffe

Version: 1

Author: Mark Welch

Introduction: This is an assessment of the impact of a decision to accept government grant funding for the DBAIP, to deliver improvements to the Port of Dover border controls to increase throughput and reduce disruptions. These changes aim to result in reduced traffic management and queuing on the public highway which has adverse impacts on residents, businesses and visitors to Dover and the wider area.

Summary and recommendations of equality analysis/impact assessment.

Context

KCC submitted a successful bid in August 2022 to the Levelling Up Fund round 2, for the purpose of improving Port of Dover border controls to reduce on-highway congestion, queuing, and the need for traffic management. Details on the basis for that bid were provided to the ETCC in September 2022 the proposal is known as the Dover Border Access Improvement Project (DBAIP), having previously been reported to ETCC under the name "Dover Access Improvements". The proposal is seeking to utilise a £20m grant from the Levelling Up Fund.

Dover District is classed as a Level 1 (1 being the highest rating for need) Priority Area in the Levelling Up Fund. In January 2023 the government announced that the bid has been successful, and funding would be awarded subject to business case development and due diligence by KCC.

Summary of equality impact

This EqlA is for KCC's decision to accept government grant funding from the Levelling Up Fund to deliver the DBAIP. The adverse impacts experienced across a large swathe of Dover and more widely from traffic management required for the Port of Dover means that it is anticipated that delivery of the DBAIP will lead to positive impacts on protected groups, by reducing the likelihood of the need for traffic management. These findings are supported by Social Distribution Impacts analysis reported to government as part of the DBAIP Full Business Case.

Adverse Equality Impact Rating Low

Approval by:

Responsible Owner

Name: Joseph Ratcliffe
Job Title: Transport Strategy Manager

Date: 30.05.2026

Head of Service

Name: Tim Read
Job Title: Head of Transportation

Date: 30.05.2026

Assessment

Protected Group	Please provide a brief commentary on your findings. Fuller analysis should be undertaken in Part 2.			
	High negative impact	Medium negative impact	Low negative impact	High/Medium/Low Positive Impact Evidence
Age	None	None	None	Overall, by reducing the likelihood of traffic management requirements associated with the Port of Dover generated traffic, both users of the Port and local communities should experience reduced disruptions and delays which otherwise have an adverse effect on their quality of life. Our Social Distributional Impacts analysis accident assessment also concludes that the DBAIP is anticipated to have a Slight Beneficial impact on children below 16 years and a neutral impact on those above the age of 70, by improving the management and flow of traffic. Past disruptions have reported significant impacts on school coach parties. Overall, we conclude a medium positive impact on this group.
Disability	None	None	None	As above, this group could benefit from having less disrupted and delayed journeys on the public road network and through the Port. Past disruptions have reported significant impacts on users

				including those with specific and sensitive needs including those with particular disabilities. We conclude a medium positive impact on this group.
Sex	None	None	None	As above. There is nothing about this particular protected group that drives a different conclusion to the above answer for the previous protected group, although sex is likely to be a less distinguishing factor concerning the extent to which people are affected by traffic delays and disruption that the project aims to reduce. We conclude a low positive impact on this group.
Gender identity/ Transgender	None	None	None	As above. There is nothing about this particular protected group that drives a different conclusion to the above answer for the previous protected group. There is a very small proportion of people in this protected group in Dover which means the probability that the group would experience benefit from the project is reduced. We conclude a low positive impact on this group.
Race	None	None	None	As above. There is nothing about this particular protected group that drives a different conclusion to the above answer for the previous protected group. We conclude a low positive impact on this

				group.
Religion and Belief	None	None	None	As above. There is nothing about this particular protected group that drives a different conclusion to the above answer for the previous protected group. We conclude a low positive impact on this group.
Sexual Orientation	None	None	None	As above. There is nothing about this particular protected group that drives a different conclusion to the above answer for the previous protected group. We conclude a low positive impact on this group.
Pregnancy and Maternity	None	None	None	As above, this group could benefit from having less disrupted and delayed journeys on the public road network and through the Port. Past disruptions have reported significant impacts on users including those with specific and sensitive needs including those in pregnancy and maternity stage following birth. We conclude a medium positive impact on this group.
Marriage and Civil Partnerships	None	None	None	As above. There is nothing about this particular protected group that drives a different conclusion to the above answer for the previous protected group, although sex is likely to be a less

				distinguishing factor concerning the extent to which people are affected by traffic delays and disruption that the project aims to reduce. We conclude a low positive impact on this group.
Carer's Responsibilities	None	None	None	As above, this group could benefit from having less disrupted and delayed journeys on the public road network and through the Port. Past disruptions have reported significant impacts on users including those with specific and sensitive needs including those with carer responsibilities who could find it more difficult to reach those they are responsible or are travelling with those they care for. Owing to the potential volume of carers in Dover given national and Kent wide trends, we conclude a medium positive impact on this group.

Equality Analysis /Impact Assessment data and evidence

Protected groups

It is anticipated that no protected characteristic groups will be negatively impacted by KCC's decision to receive government grant funding to commission delivery of the DBAIP project. The below evidence and data have been used to support reaching this conclusion, covered in further detail at the end of this note.

Information and Data used to carry out your assessment

As of 2025, the estimated population of Kent is 1,610,300¹. Going forward the population growth for Kent is expected to rise due to natural increase (more births than deaths) and more people moving into Kent than leaving.

Analysis of 2021 census data about equality and diversity in Kent was undertaken to better understand the demographics of the Kent population and the impact of KCC's decision will have. This information has been reviewed in relation to the updated Proposal to Government following the close of the consultation.

The focus has been placed on Dover residents. It is important to note that users of the Port (thereby vehicle occupants) would also be beneficiaries of the DBAIP. No published demographic data is available on the UK passport holders passing through the Port, or for non-UK-passport holders. Nonetheless, given millions of people pass through the Port each year for a range of reasons from logistics, business trips to leisure and vacations, it is reasonable to assume all the protected groups will be represented by the vehicle occupants and stand to receive positive impacts from the DBAIP.

Equality and diversity data from Kent Analytics District Profiles and Census 2021 shows that:

- The total population in Dover was 119,800.
- Within Dover district there were 58,300 males and 61,500 females – 48.7% and 51.3% as a proportion of the total district population.
- Dover has above average proportions of its total population of male and females over the age of 55, compared to the Kent average, with all age groups below the age of 55 being below the Kent average for males and females.
- 94.9% of Dover residents are White, compared to 5.1% Black and Minority Ethnic (BAME) residents.
- Concerning religion, 49.6% of Dover residents are Christians, with 42.4% having no religion. Other faiths included 0.5% being Buddhist, 0.6% Hindu, 0.1% Jewish, 0.6% Muslim, 0.1% Sikh, 0.6% other religion, and 5.5% not answering this Census question.
- Concerning disability, 22,834 residents stated they have a disability out of 96,132 that answered, equating to a proportion of 23.8%.

¹ [Population data - Kent County Council](#)

- Concerning gender identity, in Dover 336 people stated in the Census that they have a gender identity different from their sex registered at birth, equating to 0.004% of those that answered this part of the Census.
- On sexual orientation, of the total population 3% stated they were Lesbian, Gay, Bisexual or Other (LGB+). The proportion is significantly higher than average amongst lower age groups of with 16- to 24-year-olds having a proportion of 6.8%, whilst above the age of 45 years, the proportion was always lower than the District average, with the proportion declining as age increases.
- Regarding marriage and civil partnership, 46% of Dover residents were in a marriage of civil partnership, and 33.1% never having been so. Of the remainder, 7% were widowed or a surviving civil partnership partner, whilst 2.5% were separated by still in the legal partnership. The remainder – 11%, were divorced.
- Carers statistics are not reported in Census. Carers can be both registered and unregistered and paid and unpaid. The organisation Carers UK estimated that by 2022 the number of carers in the UK had reached 10.6 million, equivalent to 1 in 5 people. In Dover that would equate to 23,282. The Kent Public Health Observatory reports that in 2021, 135,893 people were providing unpaid care in Kent.

Analysis

There are clearly high proportions of Dover's population that would fall into some of the protected groups and therefore which would have a higher likelihood of experiencing the beneficial impacts arising from the DBAIP.

JUDGEMENT

- **Protected groups are likely to experience benefit from the DBAIP. No adverse impacts are likely to arise** – therefore no significant potential for discrimination and all opportunities to promote equality have been taken.

Internal Action Required

YES/NO

From: Peter Osborne – Cabinet Member for Highways & Transport
Simon Jones – Corporate Director of Growth, Environment & Transport

To: Growth, Environment and Transport Cabinet Committee – 7 July 2026

Subject: Levelling Up Fund Round 2 – Dover Border Access Improvement Project (DBAIP)

Key decision: Yes

Classification: Part 2 – Exempt (Appendices C&D) – Section 12A of the Local Government Act 1972 refers (paragraphs 3 and 5).

Past Pathway of report: None

Future Pathway of report: Cabinet Member Decision

Electoral Division: Dover Town – James Defriend
Dover Town – Albert Thorp

Is the decision eligible for call-in – Yes

1. Introduction

- 1.1 The proposed decision has been developed considering a range of specialist legal advice set out in the exempt appendices due to legal sensitivity.
- 1.2 The information from the appendices is summarised at high level in the main unrestricted report.
- 1.3 Members are asked to consider the proposal, together with the appendices, which contain supporting detail relevant to the decision.

2. Appendices

Appendix C: KCC Summary of Subsidy Assessment - **Exempt**

Appendix D: Legal advice concerning subsidy award and funding agreement – **Exempt**

3. Contact details

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By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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of the Local Government Act 1972.

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Future	Wednesday, September 9, 2026	Adaption Update	Report
Future	Wednesday, September 9, 2026	Environment Plan Update	Report
Future	Wednesday, September 9, 2026	KD-Cyclopark Lease Agreement	Key Decision
Future	Wednesday, September 9, 2026	KD-Current IAA Payments to Districts and Continuous Recycling Improvements	Key Decision
Future	Wednesday, September 9, 2026	KD-Adoption of K&M Local Growth Plan	Key Decision
Future	Wednesday, September 9, 2026	(26-00034) KCC Energy Plan	Key Decision
Future	Wednesday, September 9, 2026	Southern Water: Progression Update 6 monthly	Report
Future	Tuesday, November 10, 2026	Charging for Non-Statutory SUDS for Minor Applications	Report
Future	Tuesday, November 10, 2026	Plan Sea Update (Pre-Consultation)	Report
Future	Tuesday, November 10, 2026	25 Year Water Resourcing Plan	Report
Future	Tuesday, November 10, 2026	Environment Agency	Report
Future		Consolidated Grant (inc BSIP and Active Travel)	Report
Future		Grow in Kent Update	Report
		Kent & Medway Spatial Development Strategy	Report
Future		KD-Regional Energy Strategic Plan	Key Decision
Future		KD-HAMP (Highway Asset Management Plan)	Key Decision
Future		KD-Southern Water Joint Working	Key Decision
Future		KD-LGR-Approach to County Wide Services	Key Decision
Future		KD-Otterpool Garden Town	Key Decision
Future		KD-Street Lighting Term Services Contract Extension	Key Decision

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