



Sustainability Appraisal Report

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

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.

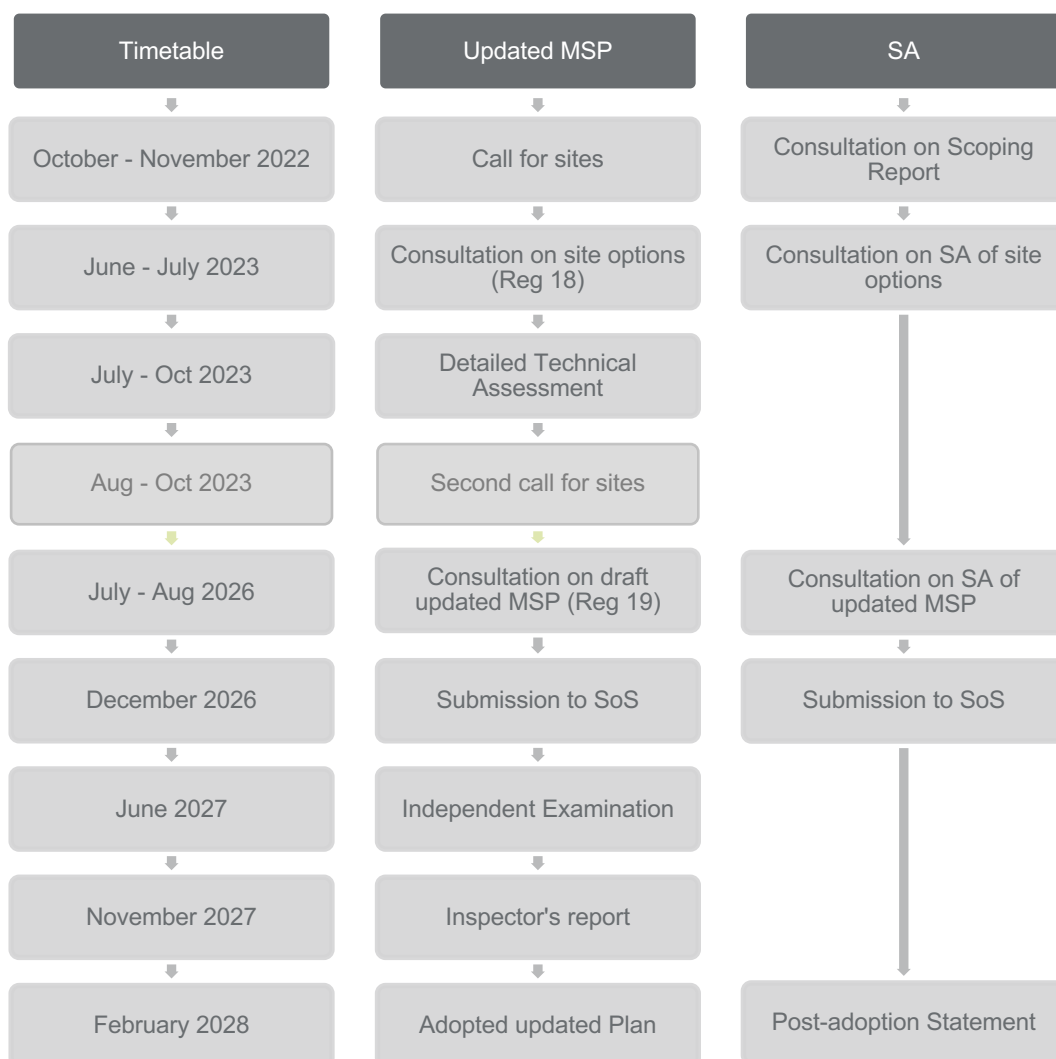
Table 3.2 – Requirements of SEA Directive and Compliance of SA Report

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).	
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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	<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>+</td><td>+</td><td>H</td><td>D</td><td>N</td></tr></table> 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.	Short	Med	Long	Prob	Dir/Ind	Rev?	0	+	+	H	D	N
Short	Med	Long	Prob	Dir/Ind	Rev?								
0	+	+	H	D	N								

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. 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.					
2. Climate change	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	Short	Med	Long	Prob	Dir/Ind	Rev?
	0	0	0	H		
No impact on sustainable waste management objectives.						

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.

