

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

Issue Raised	Representor(s)	KCC Response
Hard Rock Nominated Site - Hermitage Quarry		
<ul style="list-style-type: none"> • Quarrying would cause irreversible loss of ancient woodland and stone resources. The site contains irreplaceable habitat protected under the national planning policy. Oaken Wood is identified as protected ancient woodland of national importance and supports diverse and protected species. • Cumulative impacts with other local development, including loss of amenity and increased traffic. • Request for a clearer, less technical explanation of the proposed development. • Rerouting of Public Rights of Way (PROW) would harm the local area's historic and landscape value. • Quarrying would generate airborne dust, posing health risks to nearby residents. • Loss of ancient woodland would exceed combined losses from HS2 and the Lower 	<p>Kent Residents (x175)</p>	<ul style="list-style-type: none"> • This is recognised in the technical assessment. Part of the site is recognised as ancient woodland, being a Plantation on Ancient Woodland Site (PAWS). A PAWS site is where native trees were cleared and replaced by non-native plantations, in this case a sweet chestnut managed woodland, and is recognised as an irreplaceable habitat including the woodland features as undisturbed soil, ground flora and fungi. It is acknowledged that the development (quarrying for aggregate minerals) would result in the loss of PAWS Any PAWS losses as a consequence of quarrying have to be justified by “wholly exceptional reasons”, together with a suitable compensation strategy. The assessment of whether wholly exceptional reasons exist considers economic, social and environmental matters. This includes the need to plan for a steady and adequate supply of primary land-won aggregates to meet defined markets over the plan period and the socio-economic and environmental benefits that accrue from maintaining a local supply. The Council is satisfied that wholly exceptions reasons exist and a suitable compensation strategy can be demonstrated, and so the DM 2 policy test could be satisfied. A separate report addressing this matter has been prepared. • Cumulative impacts have been considered and acceptable in principle. The matter will be assessed in further detail as part of any planning application stage. • The nominated site is for a hard rock extension to the current quarry workings. The existing site access and aggregate processing area away from the proposed site would remain, restoration and habitat creation is proposed to be progressive behind any permitted extraction area. A suitable compensation strategy is proposed to address the loss of affected Plantation on Ancient Woodland Site (PAWS). Further detail would be provided part of any planning application stage. • The affected PROW would need to be temporarily re-routed and reinstated at end of site restoration Any re-routing would require the support of the Public Rights of Way officer, • Quarrying impacts such as dust and noise (including vibration) are material concerns, and subject to mitigation that can be secured via strengthened development management criteria and future planning conditions. These matters will be considered further at any detailed planning application stage. The strengthened Mineral Sites Plan Development Management criteria would require appropriate mitigation and be in alignment with national government guidance (e.g. Planning Practice Guidance) • Losses of ‘ancient woodland’ at other sites are matters that were/are addressed by the consideration of the planning merits of these other developments. These have significantly different material characteristics that

Thames Crossing (LTC).

- Strong call for alternative sources of aggregate that would not destroy ancient woodland, including Gallagher's racing paddock and land with Gallagher ownership.
- Proposed extension would remove around 80,000 trees and ancient soils, releasing significant greenhouse gases and conflicting with climate commitments.
- Expansion would worsen existing traffic, air quality, and noise issues from nearby housing growth.
- Emphasises the importance of access to nature for mental health and wellbeing. Significant loss of green space is seen as unacceptable in an area already heavily developed and loss of recreational green spaces for walking, cycling, and horse riding.
- Economic benefits to the operator are considered to be outweighed by environmental harm to residents.
- The 2013 quarry approval should not set a precedent due to stronger climate and woodland protections now in place.
- Doubts over claims of effective restoration, as no restored land has been returned to public use.
- Suggestion to create a "Countryside Park" to support employment, wellbeing, and local income.

were/are considered and do not directly concern the assessment of the currently hard rock nominated site.

- The National Planning Policy (NPPF) requires mineral planning authorities (MPA) to plan for the maintenance of aggregate landbanks over the adopted plan period to ensure a steady and adequate supply of aggregates to meet any specific aggregate market. Hard (crushed) rock is one such material. Following 2 call for sites, only the extension to Hermitage Quarry was submitted for consideration, The racing paddock (gallops) is around 8ha and is too small to meet the aggregate need. Other land within their control has previously been worked for minerals and restored.
- The removal of the chestnut coppice tree cover of the PAWS and the translocation of soils could have a carbon loading element on the environment in the short term. The restoration of any quarried area back to woodland and the creation of new woodland on agricultural land could potentially have carbon gains, being a greater carbon sink over the long term.
- Traffic generation is not anticipated to differ from current levels of traffic generation, as the nominated site would be a continuation of the quarrying activity, not an additional activity to current quarrying. As with current operating controls, conditions to control HGV movements (maxima) could be secured via strengthened development management criteria in the Sites Plan and any subsequent planning conditions. The strengthened Mineral Sites Plan Development Management Criteria would require any planning application to assess air quality impacts on the Aylesford Air Quality Management Area (AQMIA) and how impacts would be mitigated.
- With the exception of bridleway MR108 which crosses the site allocation and a byway (unaffected), the land is in private ownership and has no general right of public access. The landowner currently provides access to the community via a number of permissive paths. The bridleway would need to be temporarily relocated and reinstated upon completion of the development, as with the current quarrying activity, the operator advises that the permissive paths are intended to remain accessible being closed as necessary as works progress.
- The economic benefits of quarrying to meet economic needs, along with the environmental and social impacts are central to the consideration of whether the allocation is justified.
- The 2013 planning application for an extension to quarrying was assessed against all material planning concerns at that time. This does not set a precedent for the way the County Council has to discharge its plan making responsibilities. Moreover, in doing so now, it has to consider the current material planning considerations.
- Effective restoration is not measured by the availability of land for public use.
- A countryside park is not being promoted as part of the site's restoration. The restoration scheme would need to deliver the compensation strategy for the loss of the PAWS site, with full details assessed at planning application stage. The promoter has indicated that the access to the permissive paths across the site would remain.

<ul style="list-style-type: none"> • Concern restored land could lose protection and become vulnerable to housing development. • Concerns over inadequate supporting infrastructure (schools, healthcare) alongside development. • Proposes retraining quarry workers for conservation, outreach, or environmental roles. • Urges KCC to act consistently with its climate emergency declaration and biodiversity commitments by removing the site from the plan. • Questions the calculation of the 17.4 million tonne shortfall by 2039, suggesting assumptions may be flawed and the deficit overstated. • Criticises the use of high-quality Kentish Ragstone for decorative and retail purposes rather than conserving it for heritage restoration, arguing profit is prioritised over preservation. • Raises concern about blasting vibrations, potential damage to homes (including visible cracking), possible impacts on property values, and requests investigation into whether quarry blasting contributed to sinkholes recorded in 2020. • Ragstone is a non-renewable resource. 		<ul style="list-style-type: none"> • Land restored post quarrying remains land under private ownership. Restoration and aftercare would be secured through planning conditions/obligations and restoration proposals (as envisaged by the updated development management criteria for the site) do not include built development. Any future proposal for a different use would require separate planning permission and would be assessed against the development plan and other material considerations at that time. • The maintenance of adequate “supporting infrastructure (schools, healthcare) alongside development” is not a specifically relevant consideration as the promoted site, for a quarry operation, would not exert any significant pressure on community facilities. • Any requirement for re-training quarry staff in the event of closure of the existing quarry is a matter for the quarry operator to consider as an employer. This is not a material planning matter for consideration for the site allocation. • In determining whether the site should be allocated, regard has been given to the requirements of planning policy including the impacts on climate change. The KMWLP policy seeks to minimise transportation for minerals with local supply rather than more carbon intensive importation. • The adopted KMWLP identified a need for 17.4mt based upon 2023 aggregate monitoring data. The aggregate monitoring (AM) data for 2024 sales and current reserves indicate that 19.9mt of additional reserves are required over the plan period to 2039. The Local Aggregate Assessment (LAA) 2025 demonstrates how this calculation has been reached. • The extraction of aggregate facilitates the maintenance of supply for the dimension stone and is a key part of a sustainable mineral supply system. The quality of the Hythe Formation shows variation both vertically and laterally along its span in Kent. The Boughton Group of the Hythe Formation has been quarried since Roman times from this part of Kent and has sets (this refers to ordered, parallel or sub-parallel groupings of sedimentary features that share similar orientations, characteristics and origins) of sufficient depth to enable dimension stone to be quarried and used in construction for both new buildings and for the restoration and maintenance of building of special heritage importance. In order to access the sets that can yield dimension stone a significant quantity of material unsuitable for dimension stone has to be extracted. This ‘other’ material is a 50:50 ratio of a loose unconsolidated mudstone called Hassock and layers of limestone that can be used as a highly specified aggregate, as crushed rock. Quarrying to produce the aggregate enables the far less frequent sets of larger size suitable for dimension stone use to be sourced. Essentially aggregate quarrying supports the production of suitable dimension stone supply. • This has been considered as part of the detailed assessment and can be mitigated via strengthened development management criteria and secured via appropriate planning conditions. Further details would be addressed at planning application stage. Vibration and noise from blasting is subject to strictly controlled limitations in terms of peak particle velocities and air overpressure decibel limitations at the existing site. These controls would be carried forward if any planning permission were to be granted. The sink hole that appeared on the M2/M20 corridor in Kent was apparently caused by a combination of intense, prolonged rainfall and the underlying chalk geology of the area. Investigations confirmed that a Dene Hole (an ancient man-made underground chalk chamber) had collapsed after heavy rain washed away the overburden capping it. • The Hythe Formation (Kentish Ragstone) is a natural geological deposit and is therefore finite. The characterises of the limestone make it able to meet a wide range of primary aggregate construction uses, up to and including
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<ul style="list-style-type: none"> • Replanting rates will not compensate for woodland loss. • The site includes irreplaceable assets, including a SSSI, groundwater resources, and Grade 2 agricultural land. 		<p>structural concrete and capable of meeting construction needs of the plan period (to 2039).</p> <ul style="list-style-type: none"> • In order to justify mineral extraction that results in a loss of the PAWS, the test of “wholly exceptional reasons” must be satisfied, and a suitable compensation strategy be provided. The proposal provides for a net gain of some 112ha of new native planting and enhanced management of existing woodland. The total woodland creation and enhancement equate to 154 ha, which would be created compared to the 42ha woodland (including 41ha of PAWS) which is assumed would be lost to facilitate mineral working. This equates to a 266% increase of native mixed species woodland (by creation and enhancement). The strategy also includes the translocation of PAWS soils. The compensation strategy is considered acceptable to satisfy the policy test. • This is considered in the assessment. The SSSI is a geomorphological feature. There is a buffer between the SSSI, and the area proposed to be worked, and therefore there would be no direct impacts. At the planning application stage, a detailed assessment of the potential impacts of blasting, including on the SSSI, will be undertaken and the boundary of the working area will be adjusted as necessary to minimise unacceptable adverse impacts. The development management criteria for this site have been updated in the Pre-Submission Draft Plan to ensure this matter will be properly accounted for. Advice from the Environment Agency will inform safe working controls for water resources. It has advised that only quarrying above the water table using inert materials is acceptable. This can be secured by planning condition and is identified as a proposed development management criteria in the emerging Sites Plan. Any infilling activities would require an EA waste permit to control waste types. The agricultural land is currently used for pasture. Part would be retained, with some used as part of the land for the compensation strategy broad leaf native woodland planting. This, together with phased restoration with native broad leaved woodland species, is considered acceptable to mitigate the impact of further quarrying.
<ul style="list-style-type: none"> • Considers the proposal to be fundamentally incompatible with addressing the climate and biodiversity emergencies. • Argues that the destruction of ancient woodland cannot be adequately mitigated, compensated for, or replaced. Raises moral objections, emphasising intergenerational responsibility to protect ancient woodland. 	<p>General Public (outside Kent) (x242)</p>	<ul style="list-style-type: none"> • The County Council, as the mineral planning authority is required by national planning policy (NPPF) to plan for a steady and adequate supply of primary land-won aggregates to meet defined markets over the plan period. In doing so this would negate increased importation to meet needs and thus reduce carbon emissions that would otherwise be incurred. Progressive restoration and increased overall native species of broad leaf woodland and management, along with the translocation of soils is proposed to satisfy the required ‘suitable compensation scheme’. Allocation is dependent upon a suitable compensation strategy, which provides for a net gain of some 112ha of new native planting and enhanced management of existing woodland. The total woodland creation and enhancement equate to 154 ha, which would be created compared to the 42ha woodland (including 41ha of PAWS) which is assumed would be lost to facilitate mineral working. This equates to a 266% increase of native mixed species woodland (by creation and enhancement). The strategy includes the translocation of PAWS soils. This strategy is considered acceptable to satisfy the policy test. • The policy objective to protect ancient woodland is recognised in the technical assessment. Part of the site is recognised as ancient woodland, being a Plantation on Ancient Woodland Site (PAWS). A PAWS site is where native trees were cleared and replaced by non-native plantations, in this case a sweet chestnut managed woodland, and is recognised as an irreplaceable habitat including the woodland features as undisturbed soil, ground flora and fungi. It is acknowledged that the development (quarrying for aggregate minerals) would result in the loss of PAWS. Any PAWS losses as a consequence of quarrying have to be justified by “wholly exceptional reasons”, together with a suitable compensation strategy. The assessment of whether wholly exceptional reasons exist considers economic, social and environmental matters. This includes the need to plan for a steady and adequate supply of primary land-won aggregates to meet defined markets over the plan period and the socio-economic and environmental benefits that accrue from maintaining a local supply. The Council is satisfied that wholly exceptions reasons exist and a suitable compensation strategy can be demonstrated, and so the DM 2

<ul style="list-style-type: none"> • States that the proposal would result in the loss of over 50 hectares of irreplaceable ancient woodland. • Highlights that ancient woodland is a vital carbon store and supports significant native biodiversity. • Notes that ancient woodland makes up only 2.5% of England’s land area and is a nationally important heritage asset. • Conflict with Kent County Council’s climate emergency declaration (2019) and commitment to increase tree cover (2022) and undermine national climate and nature policy objectives, including Net Zero by 2050. • Refers to previous impacts from quarrying activity, including felling of mature trees and blasting vibration affecting nearby residents. • Questions whether the need for Kentish ragstone justifies the level of environmental harm, particularly where material is used for aggregate. • Suggests alternative quarrying approaches (such as tunnelling) that could avoid loss of woodland. • States that Oaken Wood is functionally irreplaceable from a conservation perspective. Identifies Oaken Wood as supporting a wide range of protected and priority species, including birds, mammals, reptiles, and invertebrates. 		<p>policy test could be satisfied. A separate report addressing this matter has been prepared.</p> <ul style="list-style-type: none"> • The allocation would result in the loss of up to 41ha of PAWS. The County Council recognises the policy protection afforded to the PAWS site and considers that the NPPF policy requirement for “wholly exceptional reasons” and a suitable compensation strategy exist to justify the allocation of the site. • The impact on carbon and the biodiversity has been considered in the assessment. Allocation is dependent upon a suitable compensation strategy, which provides for some 112ha of new native planting and enhanced management of existing woodland. The total woodland creation and enhancement equate to 154 ha. This equates to a 266% increase of native mixed species woodland (by creation and enhancement). The strategy includes new and managed woodland, habitat creation and habitat management, along with the translocation of soils. This strategy is considered acceptable to satisfy the policy test. • Noted and has been considered in the assessment. • This has been considered in the assessment. The promoter of the site for allocation proposes greater woodland coverage (266%) to mitigate the loss of the PAWS designation. This would have a longer-term beneficial effect on carbon sequestration by woodland. The allocation of the site would facilitate aggregate from a Kent land-won resource, resulting in far less carbon emissions that would occur if an equivalent amount of aggregate were to be imported over the plan period. Importation of aggregate supply would have a greater impact on carbon loading and the Government’s policy for Net Zero by 2050 • Previous and current quarrying activity is controlled by detailed planning permissions that includes conditions to control a wide range of local amenity and environmental matters. This includes controls on blasting (in relation to peak particle velocity and air over pressure limitations) imposed by the Secretary of State, which reflect acceptable conditional mineral planning permission requirements. • Hard (crushed) rock from the Hythe Formation (Kentish Ragstone) is a primary aggregate yielding geological formation that can meet the full spectrum of specified construction uses, including structural concrete. This is not a feature of all primary aggregates nor one that secondary and recycled aggregates can generally meet. The NPPF requires mineral planning authorities to make provision for a steady and adequate supply of land-won aggregates to meet defined market needs. On reviewing the available data on reserves and the projected need against other policy considerations, the allocation is justified. • Underground mining for aggregates is unlikely to be viable, unless they are scaled to meet the requirements at national or international scale. Following the second Call for Sites, no such proposal was advanced. • This is recognised in the technical assessment. The ecological value of Oaken Wood is a material planning consideration and has been considered as part of the assessment. Quarrying activity in the future would be dependent upon a conditional planning permission which would need to demonstrate appropriate compensation and mitigation for biodiversity impacts. The compensation strategy will provide for a net gain of some 112ha of new native planting and enhanced management of existing woodland. The total woodland creation and enhancement equate to 154 ha, which would be created compared to the 42ha woodland (including 41ha of
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<ul style="list-style-type: none"> • Raises concern over significant carbon release from disturbance of ancient woodland soils. • Notes that parts of the site are designated as a Site of Special Scientific Interest (SSSI) and should therefore be protected. • Claims the scale of potential woodland loss could exceed that associated with HS2 and the Lower Thames Crossing combined and represents one of the most significant single threats to ancient woodland in England in recent decades. • Urges the planning authority to apply the National Planning Policy Framework protections for irreplaceable habitats and reject the allocation. 		<p>PAWS) which is assumed would be lost to facilitate mineral working. This equates to a 266% increase of native mixed species woodland (by creation and enhancement). The strategy also includes the translocation of PAWS soils. The compensation strategy is considered acceptable to satisfy the policy test.</p> <ul style="list-style-type: none"> • Carbon release due to the removal of vegetation and disturbance of topsoil that exposes organic matter, giving rise to rapid mineralisation and oxidation would be minimised by a phased approach to both extraction and restoration. The final restoration proposal is to increase woodland coverage, increasing the overall carbon sequestration by woodland in the future. Moreover, the alternative to land-won extraction to meet Kent's needs would be by greater importation. Given that hard rock is geologically distant from Kent, apart from the Hythe Formation in Kent, carbon emissions from importation from Somerset, Leicestershire, Scotland or Norway would be significantly higher. • The Site of Special Scientific Interest (SSSI) is a geomorphological feature associated with the last glaciation event. There is a buffer between the SSSI, and the area proposed to be worked, and therefore no direct impacts. At the planning application stage, a detailed assessment of the potential impacts of blasting, including on the SSSI, will be undertaken and the boundary of the working area will be adjusted as necessary to minimise unacceptable adverse impacts. The development management criteria for this site have been updated in the Pre-Submission Draft Plan to ensure this matter will be properly accounted for. • Noted. The HS2 project results in up to 21 ha of loss and the Lower Thames Crossing project is expected to take a further 8ha, some 29ha in total. The nominated site would result in the loss of some 41ha of Ancient Woodland (PAWS) designation. It is also noted that the land take may be reduced at the detailed design stage. • The NPPF policy test has been applied in the technical assessment for the local plan work. Part of the site is recognised as ancient woodland, being a Plantation on Ancient Woodland Site (PAWS). A PAWS site is where native trees were cleared and replaced by non-native plantations, in this case a sweet chestnut managed woodland, and is recognised as an irreplaceable habitat including the woodland features as undisturbed soil, ground flora and fungi. It is acknowledged that the development (quarrying for aggregate minerals) would result in the loss of PAWS. Any PAWS losses as a consequence of quarrying have to be justified by "wholly exceptional reasons", together with a suitable compensation strategy. The assessment of whether wholly exceptional reasons exist considers economic, social and environmental matters. This includes the need to plan for a steady and adequate supply of primary land-won aggregates to meet defined markets over the plan period and the socio-economic and environmental benefits that accrue from maintaining a local supply. The Council is satisfied that wholly exceptions reasons exist and a suitable compensation strategy can be demonstrated, and so the DM 2 policy test could be satisfied. A separate report addressing this matter has been prepared.
<p>Petition that states:</p> <p><i>"We must not lose any more ancient woodland or farmland, particularly for a quarry extracting stone that we don't need. Ragstone is a poor material to build houses from and it doesn't insulate well. For heritage restoration there are other sources of ragstone.</i></p> <p><i>Once ancient woodland take 400 years to develop its</i></p>	<p>409 (with 6 duplicates) parties signed the petition addressed to former Cabinet Member Susan Carey – submitted via Cllr Stuart Jeffery</p>	<ul style="list-style-type: none"> • The NPPF policy test has been applied in the technical assessment for the local plan work. Part of the site is recognised as ancient woodland, being a Plantation on Ancient Woodland Site (PAWS). A PAWS site is where native trees were cleared and replaced by non-native plantations, in this case a sweet chestnut managed woodland, and is recognised as an irreplaceable habitat including the woodland features as undisturbed soil, ground flora and fungi. It is acknowledged that the development (quarrying for aggregate minerals) would result in the loss of PAWS. Any PAWS losses as a consequence of quarrying have to be justified by "wholly exceptional reasons", together with a suitable compensation strategy. The assessment of whether wholly exceptional reasons exist considers economic, social and environmental matters. This includes the need to plan for a steady and adequate supply of primary land-won aggregates to meet defined markets over the plan period and the socio-economic and environmental benefits that accrue from maintaining a local supply. The Council is satisfied that

<p><i>special biodiversity and once it's gone it's gone. And we desperately need to preserve our farm land for the future."</i></p>		<p>wholly exceptions reasons exist and a suitable compensation strategy can be demonstrated, and so the DM 2 policy test could be satisfied. A separate report addressing this matter has been prepared.</p> <p>The allocation would provide a net gain of some 112ha of new native planting and enhanced management of existing woodland. The total woodland creation and enhancement equate to 154 ha, which would be created compared to the 42ha woodland (including 41ha of PAWS) which is assumed would be lost to facilitate mineral working. This equates to a 266% increase of native mixed species woodland (by creation and enhancement). The strategy also includes the translocation of PAWS soils. The compensation strategy is considered acceptable to satisfy the policy test.</p> <p>Ragstone is a high-quality material used for a number of applications as it is a versatile, high strength limestone. As an aggregate it can be used for high specification concrete mixes such as structural concrete in foundations and general building projects. It also has applications as a road construction sub-base (such as Type 1 or Type 3 sub-base) and as a coated stone (asphalt) material in road construction and maintenance. The angular nature of the crushed rock as a sized aggregate (10-20mm) makes the material suitable for permeable drainage applications and loose 'gravel' areas in pathways and gardens. The larger sized spalls (100-200mm) are used as a heavy fill in gabion baskets for use as retaining walls, slope stabilisation and as 'riprap' coastal defence works.</p> <p>The site would also produce building or masoned dimension stone which is used for building and restoration purposes. These are important in terms of maintaining local traditional architectural vernacular and particularly for heritage conservation uses where Kentish Ragstone has been used in their construction. This includes the cathedrals of Rochester and Canterbury, the Tower of London, the Archbishop's Place in Maidstone and many listed buildings in the county. Whilst Kentish Ragstone is no longer used as a main building material for volume house building, it has an important role to play in new build projects where it is used to reflect the traditional architectural vernacular of the area.</p> <p>It is recognised that ancient woodland is designated as an irreplaceable habitat and this is considered in the detailed assessment work.</p>
<ul style="list-style-type: none"> The proposal is out of touch with the climate and nature crises we currently face. Ancient woodland such as Oaken Wood is an irreplaceable habitat that acts as a vital carbon store and is home to rare and diverse animal and plant life. The extension could threaten over 50 hectares of this precious habitat. This would be a disgraceful act of destruction that no amount of compensatory planting and future landscape restoration could absolve. 	<p>Woodland Trust Campaign (25,473) letters/emails</p>	<ul style="list-style-type: none"> The NPPF policy test has been applied in the technical assessment for the local plan work. Part of the site is recognised as ancient woodland, being a Plantation on Ancient Woodland Site (PAWS). A PAWS site is where native trees were cleared and replaced by non-native plantations, in this case a sweet chestnut managed woodland, and is recognised as an irreplaceable habitat including the woodland features as undisturbed soil, ground flora and fungi. It is acknowledged that the development (quarrying for aggregate minerals) would result in the loss of PAWS. Any PAWS losses as a consequence of quarrying have to be justified by "wholly exceptional reasons", together with a suitable compensation strategy. The assessment of whether wholly exceptional reasons exist considers economic, social and environmental matters. This includes the need to plan for a steady and adequate supply of primary land-won aggregates to meet defined markets over the plan period and the socio-economic and environmental benefits that accrue from maintaining a local supply. The Council is satisfied that wholly exceptions reasons exist and a suitable compensation strategy can be demonstrated, and so the DM 2 policy test could be satisfied. A separate report addressing this matter has been prepared. The allocation would provide a net gain of some 112ha of new native planting and enhanced management of existing woodland. The total woodland creation and enhancement equate to 154 ha, which would be created compared to the 42ha woodland (including 41ha of PAWS) which is assumed would be lost to facilitate mineral working. This equates to a 266% increase of native mixed species woodland (by creation and enhancement). The strategy also includes the translocation of PAWS soils. The compensation strategy is considered acceptable to satisfy the policy test. The allocation would result in the loss of up to 41ha of PAWS, along with the translocation of soils and progressive restoration. The strengthened Mineral Sites Plan Development Management Criteria would require any planning application to detailed restoration proposals to demonstrate that the losses of this priority habitat would be compensated by restoration details including the range of trees and

<ul style="list-style-type: none"> In 2019, Kent County Council recognised the UK's climate and environment emergency. In 2022, it committed to protecting and increasing the county's tree cover. And the Environment Act (2021) has introduced a mandatory Biodiversity Net Gain requirement that will apply from late 2023. Approving the expansion of this scheme would be utterly at odds with these values and requirements. 		<p>shrub sizes of native species to create a vertical design element to the replacement woodland planting, detailed ecological appraisals to enable to enhance the biodiversity of restoration and translocation of ancient woodland soils with ongoing monitoring.</p> <ul style="list-style-type: none"> Construction needs still require primary aggregate supply to meet the full range of specified aggregate applications. Crushed Hard rock from the Hythe Formation can be used for structural concrete applications where other primary aggregates and secondary and recycled aggregates cannot. The NPPF requires Kent as a mineral planning authority to plan for a steady and adequate supply of primary aggregates where there is a distinctive market for the type of aggregate being worked. This negates greater importation into the area and reduces, per tonne of supplied aggregate, the carbon emissions that would otherwise be incurred from their transportation nationally and potentially internationally to meet identified needs. A landwon resource results in reduced carbon impacts and associated HGV movements than importation.
<ul style="list-style-type: none"> A designated Ancient Woodland is under threat from allowing the expansion of Hermitage Quarry as a nominated allocation site pursuant to the draft KMWLP, this would include the loss of 75,000 trees and affect a SSSI. The woodland acts as a vital tool in reducing air pollution and provides a cooling affect. Many local people enjoy the beauty of the 	<p>Friends of Oaken Wood - 84 letters (all duplicates) submitted to former Cabinet Member by Cllr Stuart Jeffrey in March 2026</p>	<ul style="list-style-type: none"> The NPPF policy test has been applied in the technical assessment for the local plan work. Part of the site is recognised as ancient woodland, being a Plantation on Ancient Woodland Site (PAWS). A PAWS site is where native trees were cleared and replaced by non-native plantations, in this case a sweet chestnut managed woodland, and is recognised as an irreplaceable habitat including the woodland features as undisturbed soil, ground flora and fungi. It is acknowledged that the development (quarrying for aggregate minerals) would result in the loss of PAWS. Any PAWS losses as a consequence of quarrying have to be justified by "wholly exceptional reasons", together with a suitable compensation strategy. The assessment of whether wholly exceptional reasons exist considers the relevant economic, social and environmental matters. This includes the need to plan for a steady and adequate supply of primary land-won aggregates to meet defined markets over the plan period and the socio-economic and environmental benefits that accrue from maintaining a local mineral supply. The Council is satisfied that wholly exceptional reasons, and a suitable compensation strategy can be demonstrated, and so the DM 2 policy test could be satisfied. A separate report addressing this matter has been prepared. <p>The allocation would provide a net gain of some 112ha of new native planting and enhanced management of existing woodland. The total woodland creation and enhancement equate to 154 ha, which would be created compared to the 42ha woodland (including 41ha of PAWS) which is assumed would be lost to facilitate mineral working. This equates to a 266% increase of native mixed species woodland (by creation and enhancement). The strategy also includes the translocation of PAWS soils. The compensation strategy is considered acceptable to satisfy the policy test.</p> <p>The Site of Special Scientific Interest (SSSI) is a geomorphological feature associated with the last glacial episode. There is a buffer between the SSSI, and the area proposed to be worked, and therefore there would be no direct impacts. At the planning application stage, a detailed assessment of the potential impacts of blasting, including on the SSSI, will be undertaken and the boundary of the working area will be adjusted as necessary to minimise unacceptable adverse impacts. The development management criteria for this site have been updated in the Pre-Submission Draft Plan to ensure this matter will be properly accounted for.</p> <ul style="list-style-type: none"> The air pollution associated with background levels are reduced by woodland, trees and vegetation capture particulate matter on leaf surfaces and absorb gasses such as nitrogen dioxide (NO2) and carbon dioxide (CO2) sequestration. While some trees would be lost for a temporary period, the area around the site is wooded and so beneficial impacts would still occur and ultimately be greater than they are now as the restoration is designed to increase woodland (with broad leaf native species) coverage. With the exception of bridleway MR108 which crosses the site allocation and a byway (unaffected by the local

<p>woodland and is necessary to the well-being of local people.</p> <ul style="list-style-type: none"> The production of construction aggregate will contribute to environmental problems. 		<p>plan work), the land is in private ownership and has no general right of public access. The landowner currently provides access to the community via a number of permissive paths. The bridleway would need to be temporarily relocated and reinstated upon completion of the development. As with the current quarrying activity, the operator advises that the permissive paths are intended to remain accessible being closed as necessary as works progress.</p> <ul style="list-style-type: none"> Construction needs require primary aggregate supply to meet the full range of specified aggregate applications. Crushed Hard rock from the Hythe Formation can be used for structural concrete applications where other primary aggregates and secondary and recycled aggregates cannot. The NPPF requires KCC as a mineral planning authority to plan for a steady and adequate supply of primary aggregates where there is a distinctive market for the type of aggregate being exploited. This then negates greater importation into the area and reduces, per tonne of supplied aggregate, the carbon emissions that would otherwise be incurred from their transportation nationally and potentially internationally to meet identified needs. Thereby reducing carbon impacts and the associated HGV movements that would be required and be potentially avoided by ensuring continued land-won supply. As with the current mineral activity, detailed planning controls would be put in place to mitigate environmental and amenity impacts to an acceptable level. Further detail of these is provided for in the strengthened development management criteria in the emerging Sites Plan.
<ul style="list-style-type: none"> Significant ecological, environmental, and sustainability impacts. The site is ancient, replanted woodland with priority deciduous habitat present. The woodland biome has taken 400+ years to develop; quarrying would cause irreversible biodiversity loss. Habitat replacement/compensation cannot replicate the original ecosystem and is not guaranteed in the plan. Soil is a living resource and would degrade if stripped and stockpiled. Site provides habitat for turtle doves which have declined by ~93% in the UK since the 1970s due to habitat loss affecting breeding success. The claim of achieving biodiversity net gain (BNG) is considered incorrect. 	<p>Maidstone Green Party</p>	<ul style="list-style-type: none"> Ecological, environmental, and sustainability impacts have been considered in the technical assessment and are considered capable of being satisfactorily compensated and addressed in the strengthened development management criteria and in future planning conditions. Part of the site is recognised as ancient woodland, being a Plantation on Ancient Woodland Site (PAWS). A PAWS site is where native trees were cleared and replaced by non-native plantations, in this case a sweet chestnut managed woodland, and is recognised as an irreplaceable habitat including the woodland features as undisturbed soil, ground flora and fungi. It is acknowledged that the development (quarrying for aggregate minerals) would result in the loss of PAWS. Any PAWS losses as a consequence of quarrying have to be justified by “wholly exceptional reasons”, together with a suitable compensation strategy. The assessment of whether wholly exceptional reasons exist considers economic, social and environmental matters. This includes the need to plan for a steady and adequate supply of primary land-won aggregates to meet defined markets over the plan period and the socio-economic and environmental benefits that accrue from maintaining a local supply. The Council is satisfied that wholly exceptions reasons exist and a suitable compensation strategy can be demonstrated, and so the DM 2 policy test could be satisfied. A separate report addressing this matter has been prepared. Allocation is dependent upon a suitable compensation strategy, which provides for a net gain of some 112ha of new native planting and enhanced management of existing woodland. The total woodland creation and enhancement equate to 154 ha, which would be created compared to the 42ha woodland (including 41ha of PAWS) which is assumed would be lost to facilitate mineral working. This equates to a 266% increase of native mixed species woodland (by creation and enhancement). The strategy includes the translocation of PAWS soils. The overall increase in available woodland in turn would expand available habitat opportunities for other species, including those of ornithological importance. Noted. The compensation scheme would increase overall native woodland coverage.

<ul style="list-style-type: none"> • Land is under Countryside Stewardship (Higher Tier) and borders a Site of Special Scientific Interest (SSSI) • It is in high groundwater vulnerability and is within a drinking water protected zone. • Classified as Grade 2 agricultural land. 		<ul style="list-style-type: none"> • The Site of Special Scientific Interest (SSSI) is a geomorphological feature representing a landform associated with the Pleistocene glacial retreat. There is a buffer between the SSSI, and the area proposed to be worked, and therefore there would be no direct impacts. At the planning application stage, a detailed assessment of the potential impacts of blasting, including on the SSSI, will be undertaken and the boundary of the working area will be adjusted as necessary to minimise unacceptable adverse impacts. The development management criteria for this site have been updated in the Pre-Submission Draft Plan to ensure this matter will be properly accounted for. • Water resource protection is material planning concern. The Environment Agency have stated that mineral extraction should only occur above the water table, this would be a conditional requirement of any detailed planning application. The strengthened Mineral Sites Plan Development Management Criteria also addresses water resources in that any mineral development must be in compliance with the Environment Agency's approach to the management and protection of groundwater resources. Infilling operations to effect restoration would have to adhere to waste management permitting requirements to prevent pollution, particularly to ground waters. Only inert materials would be permissible by the Environment Agency in its role as the waste permitting authority. This is a matter typically addressed at any detailed planning application stage. Controls would be secured via development management criteria and planning conditions. • The agricultural land grade of the relatively small non-woodland areas is considered to be Grade 2 (Very good) to Grade 3 (Good to Moderate). The intention is to use these areas for compensatory broadleaf woodland planting to compensate for the loss of ancient woodland (PAWS) soils. Fundamentally it is not the intention to 'lose' any soils as their retention and management would be a normal part of any detailed restoration scheme normal to mineral development. The details of which would be subject of consideration at any detailed planning application stage as set out the Pre-Submission Draft Plan's strengthened development management criteria.
<ul style="list-style-type: none"> • The national planning policy framework (NPPF) has changed significantly since 2013, with stronger policies on climate change, biodiversity and ancient woodland protection. • Planning policy makes no distinction between Oaken Wood and other ancient woodlands, contrary to the applicant's suggestion. • Alternative site options have not been considered, which is a core requirement of sound spatial planning. • The proposal would result in the loss of designated ancient woodland, including around 80,000 trees and ancient soils, releasing significant greenhouse gases. 	<p>Cllr Clive English (Maidstone Borough Council)</p>	<ul style="list-style-type: none"> • The NPPF 2024 has significantly changed since the 2012/13 versions, particularly regarding the protection for ancient woodlands, climate change and mandatory net gain for biodiversity interests. The revised policy considerations have been addressed in the technical assessment, against policy requirements for the maintenance of a steady and adequate supply of aggregate minerals to meet defined market needs. The assessment work supports the case to allocate the site and that wholly exceptional reasons, and a suitable compensation scheme exist to satisfy NPPF policy. Furthermore, in maintaining local supply of this aggregate material would have a climate change benefit of negating the increased carbon emissions associated with increased aggregate importation. • Oaken Wood is correctly identified as a PAWS (Planted Ancient Woodland Sites) and Local Wildlife Site and has been assessed on that basis. • For a site to be allocated it has to be deliverable. In response to the two Call for Sites exercises, only the extension to Hermitage Quarry was promoted. In terms of potential alternatives to meet the identified need, the County Council also reviewed the sites that had been previously examined by the Planning Inspectorate and considered the impact of substituting land-won aggregate hard rock supply with greater importation over wharves and rail depots. • The intention is to retain the PAWS soil characteristics as much as possible by translocation with progressive restoration. Moreover, this would be supplemented with increased broad leaf native species woodland coverage with an overall increased area for woodland plantation progressively with a phased restoration of the quarried area. Such that in the long term a net gain in woodland coverage and species diversity would occur.

<ul style="list-style-type: none"> • Development would harm legally protected species and impact groundwater, worsening existing water resource pressures. • Potential impacts on groundwater, traffic, noise, and air quality have not been adequately assessed. • Claims about landscape restoration are uncertain, and restored land could become vulnerable to future housing development once woodland protection is removed. 		<ul style="list-style-type: none"> • The promoted site's maximum depth of extraction is intended to be above recorded groundwater level and in accordance with advice from Environment Agency, the strengthened Mineral Sites Plan Development Management Criteria also addresses water resources in that any mineral development must be in compliance with the Environment Agency's approach to the management and protection of groundwater resources. Infilling the quarried void would be subject to the Environment Agency's waste management permitting requirements to prevent pollution by controlling what waste inputs are permitted. • These aspects have been considered in sufficient detail for the plan making stage. Further details would be necessary at planning application stage and will be informed by strengthened development management criteria in the Local Plan. Mineral Sites Plan Development Management Criteria also addresses health and amenity in that any application shall be accompanied by a lighting, noise, air quality, vibration and blasting assessments and contain appropriate mitigation, while following any national Government guidance (e.g. Planning Practice Guidance). • This is not a relevant consideration for plan making. Future uses of any restored land would require planning permission and detailed assessment at that time. A restored quarry site is not considered brownfield. It is noted that the previously restored land at the Hermitage site has not been released for other development.
<ul style="list-style-type: none"> • Over the past six years, Barming has experienced significant residential development, including 414 homes in Barming and over 1,200 homes along Hermitage Lane. Barming is considered unable to accommodate further development without worsening existing impacts. Note that Tonbridge and Malling BC's failure to meet housing needs has shifted development pressure onto Northwest Maidstone. This displacement has exacerbated environmental and infrastructure pressures in the area. • This development has resulted in substantial loss of green space. • Residents are experiencing reduced quality of life due to increased traffic congestion and pollution. • KCC are requested to commission a detailed report on all alternative crushed rock sites. 	<p>Cllr Fay Gooch (Maidstone Borough Council)</p>	<ul style="list-style-type: none"> • The County Council is aware of the local development pressure, particularly on the road infrastructure and has considered this in its assessment of the proposed hard rock allocation site. It has concluded that continuation of the level of extraction and thus HGV numbers on the local infrastructure is acceptable, with impacts being addressed in the strengthened Mineral Sites Plan Development Management Criteria that would require a detailed transport assessment to demonstrate compliance with the adopted Kent Minerals and Waste Local Plan Policy DM 13. Moreover, any planning permission would secure any required mitigations by the imposition of appropriate planning permission conditions. • With the exception of bridleway MR108 which crosses the site allocation and a byway (unaffected), the land is in private ownership and has no general right of public access. The landowner currently provides access to the community via a number of permissive paths. The bridleway would need to be temporarily relocated and reinstated upon completion of the development; the strengthened Mineral Sites Plan Development Management Criteria that would require a proposal to demonstrate screening to mitigate impacts and the maintenance of connectivity with the surrounding network. Moreover, as with the current quarrying activity, the operator advises that the permissive paths are intended to remain accessible being closed as necessary as works progress. • Noted. Traffic impacts have been assessed and considered acceptable at current level, subject to the need for conditions at any planning permission following any planning application stage for HGV limitations to alleviate flows during peak times. • Alternatives to meeting the identified aggregate need have been considered. For a site to be allocated it has to be deliverable. In response to the two Call for Sites exercises, only the extension to Hermitage Quarry was promoted. In terms of potential alternatives to meet the identified need, the County Council has also reviewed the

		sites that had been previously examined by the Planning Inspectorate and considered the impact of substituting land-won aggregate hard rock supply with greater importation over wharves and rail depots.
<ul style="list-style-type: none"> Recommend raising a Linesearch before U Dig enquiry to positively identify the asset owner of the powerlines. 	National Grid	<ul style="list-style-type: none"> Noted.
<ul style="list-style-type: none"> In terms of traffic movements, the allocation should be a continuation of, and not additional to the current permitted workings. KCC is satisfied that the current planning permission conditions are being adhered to and the adherence is not raising any concerns. The supporting evidence is suitably up-to-date, relevant and robust. Planning permission conditions should cover all activities at the site and the operational working plans/ travel plans etc, plan for and achieve. 	National Highways	<ul style="list-style-type: none"> The site promoter intends to work the proposed allocation as a continuation of current operations, with similar operational controls. No intensification is proposed. Controls would be secured via strengthened development management criteria and planning conditions. The current planning permission conditions are effective in controlling the impacts of the current operations at Hermitage Quarry. These would be reviewed as part of any planning application. The County Highway Authority raises no objection, subject to imposition of similar conditions to limit HGV movements during peak times. It is satisfied that there is no need for further sensitivity testing for potential highways or development scenarios to be undertaken as part of the local plan work. These are matters to be addressed at any planning application stage and will need to address the strengthened development management criteria in the emerging Sites Plan
<ul style="list-style-type: none"> Policy CSM 2 supports the review of the Plan and the extension of the Plan Period to 2039 and the policy to maintain a landbank of at least 7 years supply for sharp sand and gravel as long as resources and reserves allow. With maintained landbanks of at least 7 years for soft sand and at least 10 years for hard rock throughout the Plan. The 10-year average of sharp sand and gravel sales on the Draft Review Plan appears low. 10-year average reported in LAA 2022 is 186,150 tonnes but the sales figures represented in Table 2 of the LAA says 228,544tpa. A minimum 7-year landbank to be maintained would be 1.6mt which would be inadequate by 2027 if the potential yield in the allocated sites is not realised or by 2038. If not the minimum landbank would not be maintained at the end of the Plan period. The level of provision, based on the LAA (2022) rate would be 5.016mt, giving a larger shortfall of 2.962mt. Taking into account the potential yield rather than the reverse, the surplus reported in the Plan then becomes a shortfall of 0.462mt. Soft sand, the 10-year figure for soft sand used in the Plan is higher than that in the LAA 2022 (0.456mtpa). the resulting requirement over the Plan period would be 10.032mt. A minimum 7-years landbank to be maintained would be 3.2mt. By 2029 the reserves 	Mineral Products Association (MPA)	<ul style="list-style-type: none"> Policy CSM2 of the adopted KMWLP 2024-39 sets out the aggregate need requirements, with allocations in the Mineral Sites Plan. The policy allows for the update of requirements based on the most recent LAA data. The LAA2025 (2024 data) demonstrates that over the KMWLP period there will be a 1.6mt surplus of sharp sands and gravel, given current landbanks and the injection of 2.5mt from the Mineral Site Plan allocations. For Soft Sands there will be a technical shortfall of reserves available for a maintained 7-year landbank (3.399mt). This will occur in 2035 given anticipated replenishments from the Chapel Farm allocation in the Mineral Sites Plan and windfall reserves from non-mineral development estimated as at least 0.84mt. Given that there are two local plan reviews for the KMWLP before 2035, the Inspector who examined the KMWLP in 2024/25 accepted that no further soft sand allocation is required at this time.

<p>would be below the minimum landbank requirement should the allocated sites not be delivered, or by 2036 if they are.</p> <ul style="list-style-type: none"> • Hard Rock, support the use of the 6-year average of sales based on the most up-to-date information as an indicator of future demand and market for the material, given indications that demand has increased recently and is likely to continue at these levels. The LAA 2022 acknowledges that construction demand has been increasing and Kent plays an important role in supplying the South East, indicating the importance of ensuring adequate provision is made and landbanks are maintained where possible. The LAA indicates that demand has increased recently and is likely to continue to at these levels. There is support for the revised assessment of needs for additional hard rock reserves and the proposed allocation of land to the South and West of Hermitage Quarry as an extension as a necessary measure to address the shortfall in rock reserves in Kent. The minimum landbank required to be maintained is 12.4mt (equivalent to 10-years supply). As forecasts for 2024 reserves are 13.6mt, the minimum landbank would not be maintained beyond 2025. Therefore, reserves would be completely exhausted by 2035 without new reserves being permitted. The allocation is essential to provide certainty for investment in a planning application which will enable KCC to maintain the hard rock landbank until the end of the Plan period (15mt at 2039) and comply with the NPPF. Importing hard rock from elsewhere will entail higher carbon emissions. Reliance on imports would also have minimal local economic and social benefit. 		<ul style="list-style-type: none"> • The MPA support for further hard (crushed) rock provision by allocation of the promoted site in the MSP is noted. The LAA2025 (2024 data) has updated the 6-year sales average, the available landbank of this specific aggregate mineral and the required amount of potential new reserves to meet the NPPF needs over the Plan period, this now being 19.9mt.
<ul style="list-style-type: none"> • Argues that alternative sites were not adequately considered before nominating Hermitage Quarry. Suggests alternatives such as importing hard rock from outside the county and calls for a thorough assessment of other potential sites within Kent. 	<p>CPRE</p>	<ul style="list-style-type: none"> • For a site to be allocated it has to be deliverable. In response to the two Call for Sites exercises, only the extension to Hermitage Quarry was promoted. In terms of potential alternatives to meet the identified need, the County Council has also reviewed the sites that had been previously examined by the Planning Inspectorate and considered the impact of substituting land-won aggregate hard rock supply with greater importation over wharves and rail depots. <p>Importation of additional hard rock supply via wharves and rail depots would result in additional carbon emissions as a consequence of transporting the quarried materials over extended distances, such as from Scotland, Wales, the Mendips and internationally. Moreover, given the pattern of dispersal of the importation points there could be additional HGV road miles required to transport the imported aggregate to established markets. In addition, increased hard rock aggregate importation to take the place of Kent land-won provision would take up available importation capacity headroom that is necessary as it allows for flexibility within the system. The effect of an increase of some 1.0+mtpa of hard rock importation, along with the potential need to increase national aggregate supply overall, given the Mineral Product Association's recognition of a need for some 4 billion tonnes of aggregates between 2022 and 2035, could potentially adversely impact the resilience of Kent's importation system to maintain stability and its ability to address supply shocks. Maintaining the land-won resource where</p>

<ul style="list-style-type: none"> • The site contains ancient woodland, which is irreplaceable and should be protected under NPPF paras 209, 180(c) and 211(b)). • Quarrying would adversely affect designated LWS and a SSSI. It would also result in the loss of Priority Habitat deciduous woodland. • The site includes Best and Most Versatile agricultural land, which should be safeguarded for food security and environmental benefits. • Development would negatively impact existing PROW, reducing connectivity and user experience (NPPF para 100). • The quarry would harm the setting of the Area of Outstanding Natural Beauty (AONB) (NPPF para 174(b)). • Nearby listed buildings would be adversely affected 		<p>possible will ensure, as far as feasible, that the mineral importation system can continue to operate efficiently.</p> <ul style="list-style-type: none"> • The NPPF policy test has been applied in the technical assessment for the local plan work, which recognises part of the site as PAWS and a Local Wildlife Site. A PAWS site is where native trees were cleared and replaced by non-native plantations, in this case a sweet chestnut managed woodland, and is recognised as an irreplaceable habitat including the woodland features as undisturbed soil, ground flora and fungi. It is acknowledged that the development (quarrying for aggregate minerals) would result in the loss of PAWS. Any PAWS losses as a consequence of quarrying have to be justified by “wholly exceptional reasons”, together with a suitable compensation strategy. The assessment of whether wholly exceptional reasons exist considers economic, social and environmental matters. This includes the need to plan for a steady and adequate supply of primary land-won aggregates to meet defined markets over the plan period and the socio-economic and environmental benefits that accrue from maintaining a local supply. The Council is satisfied that wholly exceptions reasons exist and a suitable compensation strategy can be demonstrated, and so the DM 2 policy test could be satisfied. A separate report addressing this matter has been prepared. <p>The allocation would provide a net gain of some 112ha of new native planting and enhanced management of existing woodland. The total woodland creation and enhancement equate to 154 ha, which would be created compared to the 42ha woodland (including 41ha of PAWS) which is assumed would be lost to facilitate mineral working. This equates to a 266% increase of native mixed species woodland (by creation and enhancement). The strategy also includes the translocation of PAWS soils. The compensation strategy is considered acceptable to satisfy the policy test.</p> <ul style="list-style-type: none"> • The Oaken Wood SSSI is a geomorphological feature associated with the Pleistocene glacial retreat. There is a buffer between the SSSI, and the area proposed to be worked, and therefore there would be no direct impacts. At the planning application stage, a detailed assessment of the potential impacts of blasting, including on the SSSI, will be undertaken and the boundary of the working area will be adjusted as necessary to minimise unacceptable adverse impacts. The development management criteria for this site have been updated in the Pre-Submission Draft Plan to ensure this matter will be properly accounted for. The intention by the nominee is to restore the site progressively, translocating the soils and further increasing woodland coverage. • The agricultural land grade of the relatively small non-woodland areas is considered to be Grade 2 (Very good) to Grade 3 (Good to Moderate). The intention is to use these areas for native broadleaf woodland planting as part of the compensation strategy for the loss of ancient woodland (PAWS) soils. Fundamentally it is not the intention to ‘lose’ any soils as their retention and management would be a normal part of any detailed restoration scheme normal to mineral development. The details of which would be the subject of consideration at any detailed planning application stage as set out the Pre-Submission Draft Plan’s strengthened development management criteria • The Public Right of Way Authority has raised no objection in principle to the temporary diversion of the affected PROW. Mineral Sites Plan Development Management Criteria that would require a proposal to demonstrate screening to mitigate impacts and the maintenance of connectivity with the surrounding network. Moreover, as with the current quarrying activity, the operator advises that the permissive paths are intended to remain accessible being closed as necessary as works progress. • This potential impact on the setting of the National Landscape (formerly AONB) has been considered in the technical assessment and the indirect impact upon the National Landscape is considered acceptable. • This has been considered in the technical assessment. The indirect impact heritage assets are considered acceptable.
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<p>by quarry operations.</p> <ul style="list-style-type: none"> The local community would experience increased traffic, noise and air pollution, reducing quality of life. Emphasises that planning decisions should minimise harm to the countryside and promote sustainable development (NPPF paras 33 and 34). 		<ul style="list-style-type: none"> This is considered in the technical assessment work. As a continuation of the quarrying operation at Hermitage Quarry, the traffic generation (HGV movements) is intended to continue not intensify as a consequence of working the nominated site. The Highway Authority has advised that Hermitage Lane has sufficient capacity to accommodate the continuation of quarry operations, subject to the reimposition of controls to limit HGVs during peak periods. This can be addressed via development management criteria and secured via planning condition. This has been considered in the technical assessment work. The NPPF requires planning authorities to balance the economic, environmental and social material considerations when making planning decisions or preparing local plans.
<ul style="list-style-type: none"> Strongly objects to the proposed Hermitage Quarry extension due to the loss and deterioration of ancient woodland. The extension would result in a nationally significant loss of ancient woodland and irreplaceable habitats. Ancient woodland is irreplaceable, covering only 2.5% of England's land area, and has high policy protection due to its ecological, cultural, historical, and landscape value. Mitigation and compensation cannot replace ancient woodland. National and local policy offer strong protection, including NPPF paragraph 180, KCC Policy DM 2, the Kent Tree Strategy, and borough-level policies in Maidstone and Tonbridge & Malling. Quarrying would cause serious indirect impacts through pollution, disturbance, and habitat fragmentation, leading to biodiversity loss. There is a risk of direct loss and damage to ancient and veteran trees, including harm to root systems and changes to environmental conditions; veteran trees are recorded in the Ancient Tree Inventory. The proposal would result in the loss of important carbon stores, undermining the UK's net-zero climate commitments, as ancient woodland stores more carbon per hectare than other woodland types. 	<p>Woodland Trust</p>	<ul style="list-style-type: none"> This is recognised in the technical assessment. The NPPF policy test and local plan policy requirements have been applied for the Mineral Sites Plan work, which recognises part of the site as PAWS and a Local Wildlife Site. A PAWS site is where native trees were cleared and replaced by non-native plantations, in this case a sweet chestnut managed woodland, and is recognised as an irreplaceable habitat including the woodland features as undisturbed soil, ground flora and fungi. It is acknowledged that the development (quarrying for aggregate minerals) would result in the loss of PAWS. Any PAWS losses as a consequence of quarrying have to be justified by "wholly exceptional reasons", together with a suitable compensation strategy. The assessment of whether wholly exceptional reasons exist considers economic, social and environmental matters. This includes the need to plan for a steady and adequate supply of primary land-won aggregates to meet defined markets over the plan period and the socio-economic and environmental benefits that accrue from maintaining a local supply. The Council is satisfied that wholly exceptions reasons exist and a suitable compensation strategy can be demonstrated, and so the DM 2 policy test could be satisfied. A separate report addressing this matter has been prepared. The allocation would provide a net gain of some 112ha of new native planting and enhanced management of existing woodland. The total woodland creation and enhancement equate to 154 ha, which would be created compared to the 42ha woodland (including 41ha of PAWS) which is assumed would be lost to facilitate mineral working. This equates to a 266% increase of native mixed species woodland (by creation and enhancement). The strategy also includes the translocation of PAWS soils. The compensation strategy is considered acceptable to satisfy the DM 2 policy test of the KMWLP 2024-39. Quarrying impacts such as dust and noise (including vibration) are material concerns and subject to mitigation that can be secured via strengthened development management criteria and future planning conditions. These matters will be considered further at any detailed planning application stage. The Woodland Trust's Ancient Tree Inventory does not record any veteran trees on site. It recognises one notable oak as a mature tree. A Tree Preservation Order (TPO) is present on part of the site. This was put into force to maintain the sweet chestnut coppice woodland. Any effects on trees subject to a TPO would be assessed through the planning application process and controlled through any permission and associated conditions. The allocation of the site would facilitate aggregate from a Kent land-won resource, resulting in far less carbon emissions (the principal pollutant) that would occur if an equivalent amount of aggregate were to be imported over the plan period. Importation of aggregate supply would have a greater impact on carbon loading and the Government's policy for Net Zero by 2050. The impact of the phased extraction and restoration of the proposed quarry would have an impact on carbon soil release and from the temporary loss of tree cover. The compensation

<ul style="list-style-type: none"> • Almost 25,000 people, including many Kent residents, have objected to the proposal. 		<p>package includes a commitment to have a 266% increase of native mixed species woodland (by creation and enhancement). This would, over time increase the carbon sequestration by natural organic processes.</p> <ul style="list-style-type: none"> • This is understood by the Kent County Council mineral planning authority. Though the law restricts any decision by the County Council to the material planning considerations in evaluating whether the allocation of any site in a local plan complies with the relevant adopted local and national planning policies.
<ul style="list-style-type: none"> • UK Government legislation and policy now require stronger protection of the natural environment in planning decisions. • Considers that the perceived benefits of allocating the site do not constitute wholly exceptional circumstances to justify the loss of irreplaceable ancient woodland. Objects to the site's allocation would further degrade the Oaken Wood Local Wildlife Site (LWS). Oaken Wood supports a range of protected and red-list species, increasing concern over biodiversity loss. The perceived planning benefits are not considered to outweigh the loss of the LWS and its ecological value. • Oaken Wood is also designated as a SSSI for its geological importance. Appropriate weight must therefore be given to potential harm to the SSSI. • It is proposed that the Biodiversity Net Gain (BNG) objective be replaced with habitat-specific compensation where irreplaceable habitats are lost. Following losses from HS2, Kent Wildlife Trust recommends a 30:1 compensation planting ratio become a policy requirement for any future development involving ancient woodland. 	Kent Wildlife Trust	<ul style="list-style-type: none"> • This is recognised in the technical assessment. The NPPF policy test and local plan policy requirements have been applied for the Mineral Sites Plan work, which recognises part of the site as PAWS and a Local Wildlife Site. A PAWS site is where native trees were cleared and replaced by non-native plantations, in this case a sweet chestnut managed woodland, and is recognised as an irreplaceable habitat including the woodland features as undisturbed soil, ground flora and fungi. It is acknowledged that the development (quarrying for aggregate minerals) would result in the loss of PAWS. Any PAWS losses as a consequence of quarrying have to be justified by "wholly exceptional reasons", together with a suitable compensation strategy. The assessment of whether wholly exceptional reasons exist considers economic, social and environmental matters. This includes the need to plan for a steady and adequate supply of primary land-won aggregates to meet defined markets over the plan period and the socio-economic and environmental benefits that accrue from maintaining a local supply. The Council is satisfied that wholly exceptions reasons exist and a suitable compensation strategy can be demonstrated, and so the DM 2 policy test could be satisfied. A separate report addressing this matter has been prepared. • Allocation is dependent upon a suitable compensation strategy, which provides for a net gain of some 112ha of new native planting and enhanced management of existing woodland. The total woodland creation and enhancement equate to 154 ha, which would be created compared to the 42ha woodland (including 41ha of PAWS) which is assumed would be lost to facilitate mineral working. This equates to a 266% increase of native mixed species woodland (by creation and enhancement). The strategy also includes the translocation of PAWS soils. The compensation strategy is considered acceptable to satisfy the policy test. • This is considered in the assessment. The SSSI is a geomorphological feature. There is a buffer between the SSSI, and the area proposed to be worked, and therefore there would be no direct impacts. At the planning application stage, a detailed assessment of the potential impacts of blasting, including on the SSSI, will be undertaken and the boundary of the working area will be adjusted as necessary to minimise unacceptable adverse impacts. The development management criteria for this site have been updated in the Pre-Submission Draft Plan to ensure this matter will be properly accounted for. • There is no prescriptive ratio for habitat replacement, each proposal having to be considered on a case-by-case basis. The 30:1 ratio for the HS2 project cannot be used a proxy for all development. The individual characteristics of sites and proposals need to be considered independently.
<ul style="list-style-type: none"> • Serious concern over the loss of a large area of irreplaceable ancient woodland and its associated wildlife. Reports indicate the presence of rare, 	RSPB	<ul style="list-style-type: none"> • The NPPF policy test and local plan policy requirements have been applied for the Mineral Sites Plan work, which recognises part of the site as PAWS. A PAWS site is where native trees were cleared and replaced by non-native plantations, in this case a sweet chestnut managed woodland, and is recognised as an irreplaceable habitat

<p>protected, and declining species on the site, including:</p> <ul style="list-style-type: none"> ○ Woodcock ○ Spotted Flycatcher ○ Stag Beetle ○ Dormouse <ul style="list-style-type: none"> • Due to the ecological importance of the site, it is recommended that Oaken Wood be removed from the Kent Mineral Sites Plan (MSP). 		<p>including the woodland features as undisturbed soil, ground flora and fungi. It is acknowledged that the development (quarrying for aggregate minerals) would result in the loss of PAWS. Any PAWS losses as a consequence of quarrying have to be justified by “wholly exceptional reasons”, together with a suitable compensation strategy. The assessment of whether wholly exceptional reasons exist considers economic, social and environmental matters. This includes the need to plan for a steady and adequate supply of primary land-won aggregates to meet defined markets over the plan period and the socio-economic and environmental benefits that accrue from maintaining a local supply. The Council is satisfied that wholly exceptions reasons exist and a suitable compensation strategy can be demonstrated, and so the DM 2 policy test could be satisfied. A separate report addressing this matter has been prepared.</p> <ul style="list-style-type: none"> • The allocation would provide a net gain of some 112ha of new native planting and enhanced management of existing woodland. The total woodland creation and enhancement equate to 154 ha, which would be created compared to the 42ha woodland (including 41ha of PAWS) which is assumed would be lost to facilitate mineral working. This equates to a 266% increase of native mixed species woodland (by creation and enhancement). The strategy also includes the translocation of PAWS soils. The compensation strategy is considered acceptable to satisfy the policy test. The increase habitat area would provide opportunities for other woodland species that are considered important for bito conservation, including protected ornithological species. <p>At present the site is not part of the adopted Kent Mineral Sites Plan (MSP) and its potential allocation is the subject of detailed technical assessment.</p>
<ul style="list-style-type: none"> • The inclusion of the nominated hard rock site is estimated to cause direct loss and deterioration of at least 45 hectares of ancient woodland. The loss of irreplaceable habitat is not adequately acknowledged or assessed in the draft Plan or supporting documents. NPPF paragraph 180(c) states that development resulting in the degradation of ancient woodland should only be permitted in exceptional circumstances. • A substantial compensation strategy would be required, although compensation should be treated as a last resort. Mitigation measures would be necessary to ensure no impacts on retained ancient woodland. Where impacts cannot be fully mitigated, additional compensation for loss and deterioration would need to be agreed. • Alternative provision should be explored outside the local authority area through the Duty to Cooperate and increased use of alternative materials. 	<p>Forestry Commission</p>	<ul style="list-style-type: none"> • This is recognised in the technical assessment. The NPPF policy test and local plan policy requirements have been applied for the Mineral Sites Plan work, which recognises part of the site as PAWS and Local Wildlife Site. A PAWS site is where native trees were cleared and replaced by non-native plantations, in this case a sweet chestnut managed woodland, and is recognised as an irreplaceable habitat including the woodland features as undisturbed soil, ground flora and fungi. It is acknowledged that the development (quarrying for aggregate minerals) would result in the loss of PAWS. Any PAWS losses as a consequence of quarrying have to be justified by “wholly exceptional reasons”, together with a suitable compensation strategy. The assessment of whether wholly exceptional reasons exist considers economic, social and environmental matters. This includes the need to plan for a steady and adequate supply of primary land-won aggregates to meet defined markets over the plan period and the socio-economic and environmental benefits that accrue from maintaining a local supply. The Council is satisfied that wholly exceptions reasons exist and a suitable compensation strategy can be demonstrated, and so the DM 2 policy test could be satisfied. A separate report addressing this matter has been prepared. • Allocation is dependent upon a suitable compensation strategy, that provides for a net gain of some 112ha of new native planting and enhanced management of existing woodland. The total woodland creation and enhancement equate to 154 ha, which would be created compared to the 42ha woodland (including 41ha of PAWS) which is assumed would be lost to facilitate mineral working. This equates to a 266% increase of native mixed species woodland (by creation and enhancement). The strategy also includes the translocation of PAWS soils. The compensation strategy is considered acceptable to satisfy the policy test. • For a site to be allocated it has to be deliverable. In response to the two Call for Sites exercises, only the extension to Hermitage Quarry was promoted. In terms of potential alternatives to meet the identified need, the County Council has also reviewed the sites previously examined by the Planning Inspectorate when it granted planning permission for the current quarrying site, along with the impact of substituting land-won aggregate hard rock supply with greater importation over wharves and rail depots. <p>The NPPF requires Mineral Planning Authorities to plan for a steady and adequate supply of land-won aggregate minerals in its area to meet defined needs of specific markets. Hard (crushed) rock from the Hythe Formation</p>

		<p>(Limestone-Kentish Ragstone) is a primary aggregate yielding geological formation that can meet the full spectrum of specified construction uses, including structural concrete. This is not a feature of all primary aggregates nor one that secondary and recycled aggregates can generally meet.</p>
<ul style="list-style-type: none"> • Objects to the proposed quarry extension due to direct loss of priority habitat and biodiversity, and impacts on the Oaken Wood LWS with impacts that cannot be adequately justified or mitigated. • NPPF paragraph 180(d), which states that development leading to the loss or deterioration of irreplaceable habitats should be refused unless wholly exceptional reasons exist, alongside a suitable compensation strategy. Further argues that approval of the extension would lead to an unacceptable loss of irreplaceable habitat and biodiversity. • Notes that 34 hectares of ancient woodland were lost during a previous quarry extension, and the current nomination could result in approximately 63 hectares being impacted in total. 	<p>Buglife</p>	<ul style="list-style-type: none"> • This is recognised in the technical assessment. The NPPF policy test and local plan policy requirements have been applied for the Mineral Sites Plan work, which recognises part of the site as PAWS and a Local Wildlife Site. A PAWS site is where native trees were cleared and replaced by non-native plantations, in this case a sweet chestnut managed woodland, and is recognised as an irreplaceable habitat including the woodland features as undisturbed soil, ground flora and fungi. It is acknowledged that the development (quarrying for aggregate minerals) would result in the loss of PAWS. Any PAWS losses as a consequence of quarrying have to be justified by “wholly exceptional reasons”, together with a suitable compensation strategy. The assessment of whether wholly exceptional reasons exist considers economic, social and environmental matters. This includes the need to plan for a steady and adequate supply of primary land-won aggregates to meet defined markets over the plan period and the socio-economic and environmental benefits that accrue from maintaining a local supply. The Council is satisfied that wholly exceptions reasons exist and a suitable compensation strategy can be demonstrated, and so the DM 2 policy test could be satisfied. A separate report addressing this matter has been prepared. • Allocation is dependent upon a suitable compensation strategy, that provides for a net gain of some 112ha of new native planting and enhanced management of existing woodland. The total woodland creation and enhancement equate to 154 ha, which would be created compared to the 42ha woodland (including 41ha of PAWS) which is assumed would be lost to facilitate mineral working. This equates to a 266% increase of native mixed species woodland (by creation and enhancement). The strategy also includes the translocation of PAWS soils. The compensation strategy is considered acceptable to satisfy the policy test. • Planning permission for the current working area of Hermitage Quarry was granted by a Planning Inspector at a public inquiry having been satisfied that the need for the mineral development outweighed the policy protection for the woodland.
<ul style="list-style-type: none"> • Concerns were partly addressed by Gallagher maintaining public access to woodland areas outside the quarry boundary. • Further expansion into the woodland would reduce informal public access. The extension would directly impact the PROW network. Emphasis is placed on securing suitable diversions for affected equestrian PROWs (MR496, KM13 and MR108). • Maintaining onward connectivity to surrounding routes (MR617, MR618, MR619, KM333, KM6 and KM7) is considered essential. • The area is highly valued by horse riders west of Maidstone as a rare opportunity for off-road riding. Protection of access for horse riders and other users is seen as critical. 	<p>British Horse Society</p>	<ul style="list-style-type: none"> • Noted. • The impact upon public right of ways has been considered. The affected bridleway will require a suitable temporary diversion. The details of which are a matter for any detailed planning application stage. • Noted. • Noted.

<ul style="list-style-type: none"> • Early planning with the quarry operator is encouraged to safeguard recreation and access provision. 		<ul style="list-style-type: none"> • Noted.
<ul style="list-style-type: none"> • The proposal threatens over 50 hectares of irreplaceable protected ancient woodland, which is vital for biodiversity complexity, ecological value, and cultural significance. Loss of this habitat would damage biodiversity and limit scientific understanding of complex ecosystems. • The loss of ancient woodland is irreversible, and compensatory planting cannot replicate its ecological complexity. • The County Council recognised a climate and environmental emergency in 2019 and committed to increasing tree cover in 2022; the proposed extension conflicts with these commitments and weaken climate change action. • The Environment Act (2021) introduced mandatory Biodiversity Net Gain (BNG) from late 2023, which the proposal is seen to undermine. • Ancient woodland provides essential ecosystem services, including carbon sequestration, air and water purification and flood mitigation. • Protecting Oaken Wood is considered essential for scientific research, sustainable living, and for future generations to use as a reference for such study. 	<p>EcoSentience (on behalf of residents)</p>	<ul style="list-style-type: none"> • This is recognised in the technical assessment. The NPPF policy test and local plan policy requirements have been applied for the Mineral Sites Plan work, which recognises part of the site as PAWS and a Local Wildlife Site. A PAWS site is where native trees were cleared and replaced by non-native plantations, in this case a sweet chestnut managed woodland, and is recognised as an irreplaceable habitat including the woodland features as undisturbed soil, ground flora and fungi. It is acknowledged that the development (quarrying for aggregate minerals) would result in the loss of PAWS. Any PAWS losses as a consequence of quarrying have to be justified by “wholly exceptional reasons”, together with a suitable compensation strategy. The assessment of whether wholly exceptional reasons exist considers economic, social and environmental matters. This includes the need to plan for a steady and adequate supply of primary land-won aggregates to meet defined markets over the plan period and the socio-economic and environmental benefits that accrue from maintaining a local supply. The Council is satisfied that wholly exceptions reasons exist and a suitable compensation strategy can be demonstrated, and so the DM 2 policy test could be satisfied. A separate report addressing this matter has been prepared. • Allocation is dependent upon a suitable compensation strategy, that provides for a net gain of some 112ha of new native planting and enhanced management of existing woodland. The total woodland creation and enhancement equate to 154 ha, which would be created compared to the 42ha woodland (including 41ha of PAWS) which is assumed would be lost to facilitate mineral working. This equates to a 266% increase of native mixed species woodland (by creation and enhancement. The strategy also includes the translocation of PAWS soils. The compensation strategy is considered acceptable to satisfy the policy test. • The intention is to progressively restore the site and increase the overall woodland (to a 266% increase of native mixed species woodland (y creation and enhancement) coverage with native broad leaf species (the current PAWS designated Ancient Woodland area is predominantly chestnut coppice woodland, which is actively managed). This would deliver new habitats as part of the progressive restoration of the site as well as increasing the carbon sequestration from a net increase in broad leaf native species woodland coverage. • Biodiversity Net Gain (BNG) is a mandatory requirement for planning permission. Mitigation of impacts on biodiversity on the non-PAWS part of the site will be subject to BNG. • Proposed native woodland compensation includes increased woodland coverage that will assist carbon sequestration from the air and water purification and flood mitigation (as in the woodlands acting as a sustainable drainage system rather than allowing simple run off in heavy rainfall events) to be increased overall. • Noted
<ul style="list-style-type: none"> • Construction methods using local materials are environmentally friendly than importing materials. • Reduces stress on road and rail infrastructure by 	<p>Local Residents (in support) (x396)</p>	<ul style="list-style-type: none"> • Noted, importation increases carbon emissions and has an economic cost compared to more local supply as land-won in Kent. • Importation via wharves and rail depots would also require potential increases in HGV mileage to distribute the

<p>avoiding the wholesale importation of building materials into Kent.</p> <ul style="list-style-type: none"> • The quarry acts as a valuable local asset, providing local employment opportunities and skills. • Maintains the tradition of quarrying and building with Ragstone. • GAL support the local community through charity work and sponsorship at Maidstone Hospital. • The proposal is a sustainable solution for meeting the hard rock requirements in the South East. • Kentish Ragstone is vital for the restoration of the County's heritage assets. • GAL have a proven track record of successful ecological restoration. • Use of a brownfield site to meet South England's hard rock requirements without disturbing the Green Belt. 		<p>aggregate materials than maintaining land-won supply. Though this is a complex matter that cannot be easily predicted given the uneven distribution of aggregate importation points and construction market activities.</p> <ul style="list-style-type: none"> • Noted. • Noted, Kentish Ragstone is a local resource that is represented in the built vernacular of the area and beyond, including important heritage structures such as the Archbishops Palace (Maidstone), Rochester Castle, Tower of London etc. • Noted. • This estimation of Kent's hard (crushed) rock need as aggregate is based on sales patterns and available land-banks of permitted reserves. This includes the quantity that is exported out of Kent into the wider Southeast. • Noted, the Boughton Group of the Hythe Formation, that the nominated site is located upon is able to supply dimension stone of sufficient size and quality to be used in the maintenance and restoration of Kent's heritage assets and those beyond Kent such as the Tower of London. • The land nominated for mineral development is not 'brown field' land, as it has not been previously developed, though managed as a chestnut coppice woodland. Green Belt designated land can be used for mineral development where it would not compromise the function of the designation, including maintaining 'openness' of the area. • This consideration does not apply to the nominated site as it lies outside the designated Green Belt.
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Statutory Consultees

<ul style="list-style-type: none"> • East Sussex does not have hard rock quarries and relies on imports. The development of additional hard rock extraction in Kent is supported in principle, as it could help with the supply to East Sussex. • The potential for rail exports from Hermitage Quarry is noted as preferable to reduce carbon emissions. • Amendments to KMWLP Policy CSM2 relating to quantity of aggregate mineral and addition of nominated hard rock site to Kent Mineral Sites Plan. There are no hard rock quarries or provision for land-won hard rock in the East Sussex, South Downs and Brighton & Hove (ESSDB&H) Waste and Minerals Local Plan as there are no geological resources in the Plan Area. Hard rock, often in the form of crushed rock, is currently imported to the ESSDB&H Plan Area via rail heads and wharves. The Collation of the Results of the 2023 Aggregate Minerals Survey for Great Britain (2025) states that of the 568,000t of 	<p>East Sussex County Council</p>	<ul style="list-style-type: none"> • The calculation of need for further land-won hard rock takes account of any export patterns from Kent to neighbouring areas with different geologies. • Noted, the lack of rail connectivity is a feature of the nominated site, though this would not exclude rail transshipment from rail depots if this were viable commercially. • Noted, the 10-20% supply of hard rock from Kent to East Sussex will have been captured in the sales that informed the annual provisional rate (APR) as detailed in the Local Aggregate Assessment (LAA).
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<p>hard rock consumed in the ESSDB&H Plan Area, 10-20% is supplied from Kent.</p>		
<ul style="list-style-type: none"> No comments 	<p>West Sussex County Council</p>	<ul style="list-style-type: none"> Noted
<ul style="list-style-type: none"> Support the nomination of an additional hard rock site as the site would help reduce reliance on hard rock imports. 	<p>Surrey County Council</p>	<ul style="list-style-type: none"> Noted
<ul style="list-style-type: none"> The Sustainability Appraisal (SA) identifies that the site overlies aquifers within Source Protection Zone 3 and is an area of groundwater vulnerability. Protection of potable water supply is a significant concern, particularly in relation to planned growth in Tonbridge and Malling, and any risk to water supply should be avoided. The SA notes that the 2022 planning permission limits HGV movements to: <ul style="list-style-type: none"> A daily maximum combined total of 800 HGV movements within a single calendar month A maximum of 900 HGV movements on any one day Since that permission, there has been substantial additional residential development in the area, including: <ul style="list-style-type: none"> Around 300 dwellings off Oak Apple Lane near Hermitage Quarry Approximately 1,900 dwellings granted or under consideration in Tonbridge and Malling The County Council is requested to reconsider the cumulative traffic impacts arising from the nominated quarry site in light of this additional development. The consultee confirms that earlier consultation comments remain relevant. Continued significant concern is expressed regarding the nomination/allocation of land south and west of Hermitage Quarry for hard rock extraction, due to: <ul style="list-style-type: none"> Potential loss of priority habitat Loss of ancient woodland 	<p>Tonbridge and Malling Borough Council</p>	<ul style="list-style-type: none"> Noted. The promoted site's maximum depth of extraction is intended to be above recorded groundwater level and in accordance with advice from Environment Agency. Infilling the quarried void would be subject to the Environment Agency's waste management permitting requirements to prevent pollution by controlling what waste inputs are permitted. The EA would require that the quarrying operations and restoration of the site safeguard water resources in the underlying aquifer. This could be secured via planning condition and strengthened development management criteria. No objection in principle has been raised to the allocation. HGV movements would be the subject of any detailed planning application. The promoter's intention is to maintain current levels of output, which would result in a continuation of current HGV movement controls, including peak hour restrictions. These would be secured by strengthened development management criteria in the Sites Plan and planning conditions. Noted. The County Council is aware of the local development pressure and has considered this in its overall assessment. Continuation of the level of extraction on this has been assessed as acceptable, with impacts being addressed in strengthened development management criteria and secured by planning conditions. Cumulative impacts have been considered and are acceptable in principle. The matter will be assessed in further detail as part of any planning application. Noted. This is recognised in the technical assessment. Part of the site is recognised as ancient woodland, being a Plantation on Ancient Woodland Site (PAWS) and a Local Wildlife Site. A PAWS site is where native trees were cleared and replaced by non-native plantations, in this case a sweet chestnut managed woodland, and is recognised as an irreplaceable habitat including the woodland features as undisturbed soil, ground flora and

<ul style="list-style-type: none"> ○ Adverse impacts on biodiversity • In accordance with NPPF 2024 paragraphs 192 and 193, it is considered that wholly exceptional reasons have not been demonstrated to justify allocation of the site. • KCC is encouraged to continue exploring alternative, more suitable sites, including: <ul style="list-style-type: none"> ○ Further engagement with landowners ○ Undertaking an additional call for sites exercise • Note that the RAG Assessment identifies the following Amber and Red-Amber issues: <ul style="list-style-type: none"> ○ Nature Conservation and Geodiversity (Red-Amber) - Site is within or could have unacceptable adverse impact on national designations where there is no persuasive evidence that the benefits of the development outweigh the impacts. Site is within or could have unacceptable adverse impact on local designations where there is no evidence the impacts can be mitigated or compensated such that there is net benefit. The site is considered to have a significant adverse effect on national designations. ○ Air Quality (Amber) - The site is near to an AQMA or may have adverse impacts on air quality that is capable of mitigation. ○ Soil Quality (Amber) - Small parts of the site contain best and most versatile land which would be moderately impacted by the development. ○ Public Rights of Way (Red-Amber) - The site is likely to cause major adverse impact upon the PRow network, but this could be satisfactorily diverted and/or extensively mitigated. 		<p>fungi. It is acknowledged that the development (quarrying for aggregate minerals) would result in the loss of PAWS. Any PAWS losses as a consequence of quarrying have to be justified by “wholly exceptional reasons”, together with a suitable compensation strategy. The assessment of whether wholly exceptional reasons exist considers economic, social and environmental matters. This includes the need to plan for a steady and adequate supply of primary land-won aggregates to meet defined markets over the plan period and the socio-economic and environmental benefits that accrue from maintaining a local supply. The Council is satisfied that wholly exceptions reasons exist and a suitable compensation strategy can be demonstrated, and so the DM 2 policy test could be satisfied. A separate report addressing this matter has been prepared.</p> <ul style="list-style-type: none"> • The compensation would provide a net gain of some 112ha of new native planting and enhanced management of existing woodland. The total woodland creation and enhancement equate to 154 ha, which would be created compared to the 42ha woodland (including 41ha of PAWS) which is assumed would be lost to facilitate mineral working. This equates to a 266% increase of native mixed species woodland (by creation and enhancement). The strategy also includes the translocation of PAWS soils. The compensation strategy is considered acceptable to satisfy the policy test. • For a site to be allocated it has to be deliverable. In response to the two Call for Sites exercises, only the extension to Hermitage Quarry was promoted. In terms of potential alternatives to meet the identified need, the County Council has also reviewed the sites that had been previously examined by the Planning Inspectorate and considered the impact of substituting land-won aggregate hard rock supply with greater importation over wharves and rail depots. • Noted. The initial RAG assessment work has been considered further as part of the detailed technical assessment work. In principle the impacts identified are considered acceptable, subject to strengthened development management criteria and controls via future planning conditions. The Council is satisfied that the policy test of wholly exceptional reasons and a suitable compensation strategy as set out above satisfy the policy test,
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<ul style="list-style-type: none"> ○ Transport (Amber) - There are moderate issues with access to the Primary Route Network and Secondary Route Network. The identified impacts could be mitigated through planning obligations. ○ Services and Utilities (Red-Amber) - The site contains services or utilities which could require major mitigation through rerouting, or the location of cables/pipes hampers the ability to maximise yield from the site. ○ Health and Amenity (Red-Amber) - The site could cause major adverse impact to health and amenity from blasting in the absence of a high levels of mitigation as demonstrated. The site could cause a major impact to adjacent land uses. ● Tonbridge and Malling Borough Council (TMBC) requests further information, including: An ecological and biodiversity assessment, an arboricultural survey and Natural England's comments, if available 		<ul style="list-style-type: none"> ● As a statutory consultee Natural England's comment will be available as background evidence in any Regulation 19 public consultation. The detailed preliminary ecological survey work undertaken by the promoter of the nominated site is entitled Ecological Assessment. Ecology Solutions Limited, March 2024, and will be present as a background document in any Regulation 19 public consultation. As will the County Council's consultant's ecological assessment entitled HERMITAGE QUARRY ENVIRONMENTAL SUPPORT Ecology June 2026 by WSP. In addition, any planning application would have to include further detailed ecological appraisals to support the applicant's proposal that would be widely consulted upon including with Tonbridge and Malling Borough Council and Natural England. Details regarding the development of the site would have to accord with the strengthened Mineral Sites Plan Development Management Criteria on biodiversity. This includes a strategy to compensate losses in ancient woodland, details of BNG on areas outside PAWS ancient woodland designation, mitigation buffer zones and translocation of replacement ancient woodland soils and ongoing monitoring requirements.
<ul style="list-style-type: none"> ● Original Hermitage Quarry has already seen several extensions over the last 2 decades- the last one in 2013 resulting in 14% loss of Oaken Wood ancient woodland. ● As per para 186c) of the NPPF, the ancient woodland should be protected, and development should be refused unless there are wholly acceptable reasons and a suitable compensation strategy. 	<p>Maidstone Borough Council (MBC)</p>	<ul style="list-style-type: none"> ● Noted. The Secretary of State considered and authorised the loss of earlier parts of Oaken Wood. The KWWLP 2024-2039 recognises the need for further hard rock. ● This is recognised in the technical assessment. The NPPF policy test and local plan policy requirements have been applied for the Mineral Sites Plan work, which recognises part of the site as PAWS and a Local Wildlife Site. A PAWS site is where native trees were cleared and replaced by non-native plantations, in this case a sweet chestnut managed woodland, and is recognised as an irreplaceable habitat including the woodland features as undisturbed soil, ground flora and fungi. It is acknowledged that the development (quarrying for aggregate minerals) would result in the loss of PAWS. Any PAWS losses as a consequence of quarrying have to be justified by "wholly exceptional reasons", together with a suitable compensation strategy. The assessment of whether wholly exceptional reasons exist considers economic, social and environmental matters. This includes the need to plan for a steady and adequate supply of primary land-won aggregates to meet defined markets over the plan period and the socio-economic and environmental benefits that accrue from maintaining a local supply. The Council is satisfied that wholly exceptions reasons exist and a suitable compensation strategy can be demonstrated, and so the DM 2 policy test could be satisfied. A separate report addressing this matter has been prepared.

<ul style="list-style-type: none"> • A larger part of Oaken Wood is LWS of which its importance is recognised in the NPPF and Maidstone Local Plan Review 2021-38. • The nominated extension is in close proximity to Oaken Wood SSSI which was designated due to its key geomorphological interest. MBC is concerned that the extraction of hard rock may lead to the deterioration of the geomorphological site. 		<ul style="list-style-type: none"> • Allocation is dependent upon a suitable compensation strategy, that provides for a net gain of some 112ha of new native planting and enhanced management of existing woodland. The total woodland creation and enhancement equate to 154 ha, which would be created compared to the 42ha woodland (including 41ha of PAWS) which is assumed would be lost to facilitate mineral working. This equates to a 266% increase of native mixed species woodland (by creation and enhancement). The strategy also includes the translocation of PAWS soils. The compensation strategy is considered acceptable to satisfy the policy test. • The Site of Special Scientific Interest (SSSI) is a geomorphological feature. There is a buffer between the SSSI, and the area proposed to be worked, and therefore there would no direct impacts. At the planning application stage, a detailed assessment of the potential impacts of blasting, including on the SSSI, will be undertaken and the boundary of the working area will be adjusted as necessary to minimise unacceptable adverse impacts. The development management criteria for this site have been updated in the Pre-Submission Draft Plan to ensure this matter will be properly accounted for.
<ul style="list-style-type: none"> • Considered too distant to have any strategic impact on Tunbridge Wells Borough in terms of environment, landscape, traffic, or noise and dust. • Tunbridge Wells Borough Council is not aware of any direct impacts from the existing quarry operations. • Concern is raised that the Nature Conservation and Geodiversity rating in the initial RAG Assessment should be upgraded from Red-Amber to Red. 	Tunbridge Wells Borough Council	<ul style="list-style-type: none"> • Noted. • Noted. • Noted. The initial RAG assessment work has been considered further as part of the detailed technical assessment work. In principle the impacts identified are considered acceptable, subject to development management criteria and controls via future planning conditions. The Council is satisfied that the policy test of wholly exceptional reasons and a suitable compensation strategy as set out above satisfy the policy test,
<ul style="list-style-type: none"> • Disagrees with the proposed changes to the requirements for hard rock. • Notes the proposed allocation but does not wish to comment on the suitability of the nominated hard rock site at this stage. • Notes the indicative development management criteria but does not wish to comment at this stage. 	Gravesham Borough Council	<ul style="list-style-type: none"> • KMWLP Policy CSM2 details the aggregate landbanks and mineral requirements as needed for the Plan period to 2024-39. The methodology was the subject of the Plan's examination. The policy allows for the update of requirements based on the most recent LAA data. The LAA2025 (2024 data) demonstrates that over the KMWLP period there will be some 19.9mt shortfall of hard rock for aggregate production to 2039. The evidence supporting the need for any allocation is derived from the Aggregate Mineral (AM) survey that is undertaken annually and demonstrates available reserves and sales. The data is used to inform if further allocations is required over the Plan period. • Noted. • Noted.
<ul style="list-style-type: none"> • Concern raised about negative impacts on both the environment and local quality of life. 	Barming Parish Council	<ul style="list-style-type: none"> • Noted. In principle the impacts arising from the continuation of quarry operations at the site are considered acceptable, subject to the relevant strengthened development management criteria and tailored planning conditions. The operator's intention would be to continue operations at the current extraction rate, which is mitigated by current planning conditions.

<ul style="list-style-type: none"> • Quarry expansion would destroy valuable natural habitats, including the loss of around 80,000 trees. • Destruction of undisturbed woodland soils would release significant greenhouse gases, worsening the climate emergency acknowledged by KCC in May 2019. • Oaken Wood provides a sustainable supply of timber for construction and agriculture, along with unique habitats that cannot be replaced once lost. • The proposal would further reduce green space already being lost to housing development along Hermitage Lane and the A20 corridor. • Finds it unacceptable that no alternative hard rock quarry sites have been explored. • Acknowledges the economic and employment benefits of quarry expansion but considers environmental harm to be substantial. 		<ul style="list-style-type: none"> • Allocation is dependent upon a suitable compensation strategy, that provides for a net gain of some 112ha of new native planting and enhanced management of existing woodland. The total woodland creation and enhancement equate to 154 ha, which would be created compared to the 42ha woodland (including 41ha of PAWS) which is assumed would be lost to facilitate mineral working. This equates to a 266% increase of native mixed species woodland (by creation and enhancement). The strategy also includes the translocation of PAWS soils. The compensation strategy is considered acceptable to satisfy the policy test. • The removal of the chestnut coppice tree cover of the PAWS and the translocation of soils could have a carbon loading element on the environment in the short term. The County Council has concluded that the NPPF “wholly exceptional reasons” test in regard to the PAWS designation has been met. The restoration of any quarried area back to woodland and the creation of new woodland on agricultural land could potentially have carbon gains, being a greater carbon sink over the long term. Moreover, the allocation of the site would facilitate aggregate from a Kent land-won resource, resulting in far less carbon emissions that would occur if an equivalent amount of aggregate were to be imported over the plan period. Importation of aggregate supply would have a greater impact on carbon loading and the Government’s policy for Net Zero by 2050 • Allocation is dependent upon a suitable compensation strategy, that provides for a net gain of some 112ha of new native planting and enhanced management of existing woodland. The total woodland creation and enhancement equate to 154 ha, which would be created compared to the 42ha woodland (including 41ha of PAWS) which is assumed would be lost to facilitate mineral working. This equates to a 266% increase of native mixed species woodland (by creation and enhancement). The strategy also includes the translocation of PAWS soils. The compensation strategy is considered acceptable to satisfy the policy test. • The impact from housing development at other locations is noted, although not directly relevant to the mineral considerations. With the exception of bridleway MR108 which crosses the site allocation and a byway (unaffected), the land is in private ownership and has no general right of public access. The landowner currently provides access to the community via a number of permissive paths. The bridleway would need to be temporarily relocated and reinstated upon completion of the development, as with the current quarrying activity, the operator advises that the permissive paths are intended to remain accessible being closed as necessary as works progress. • For a site to be allocated it has to be deliverable. In response to the two Call for Sites exercises, only the extension to Hermitage Quarry was promoted. In terms of potential alternatives to meet the identified need, the County Council also reviewed the sites that had been previously examined by the Planning Inspectorate and considered the impact of substituting land-won aggregate hard rock supply with greater importation over wharves and rail depots. • The environmental impact is material planning considerations, significantly the loss of ancient woodland of a PAWS designation. A PAWS site is where native trees were cleared and replaced by non-native plantations, in this case a sweet chestnut managed woodland, and is recognised as an irreplaceable habitat including the woodland features as undisturbed soil, ground flora and fungi. It is acknowledged that the development (quarrying for aggregate minerals) would result in the loss of PAWS. Any PAWS losses as a consequence of quarrying have to be justified by “wholly exceptional reasons”, together with a suitable compensation strategy. The assessment of whether wholly exceptional reasons exist considers the economic, social and environmental matters. This includes the need to plan for a steady and adequate supply of primary land-won aggregates to meet defined markets over the plan period and the socio-economic and environmental benefits that accrue from maintaining a local supply. The Council is satisfied that wholly exceptions reasons exist and a suitable compensation strategy can be demonstrated, and so the DM 2 policy test could be satisfied. A separate report addressing this matter has been prepared.
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<ul style="list-style-type: none"> • Requests that KCC explore alternative, more sustainable development options that minimise impacts on the environment and community. 		<ul style="list-style-type: none"> • In response to the two Call for Sites exercises, only the extension to Hermitage Quarry was promoted by an operator/landowner. In terms of potential alternatives to meet the identified need, the County Council also reviewed the sites that had been previously examined by the Planning Inspectorate and considered the impact of substituting land-won aggregate hard rock supply with greater importation over wharves and rail depots.
<ul style="list-style-type: none"> • The proposal would result in further loss of ancient woodland due to ragstone quarrying. • Quarrying could extend close to properties at Sweets Land and Easterfields, causing noise disturbance and vibration from blasting. • The development would lead to loss of countryside in the Medway Gap, an area already under pressure from housing development. • Public bridleway MR108 would be affected, impacting an important off-road route used by nearby riding stables. There is a strong need to protect off-road riding routes, which are limited in the area. • A full assessment of existing flora and fauna the biodiversity should be undertaken before any decision is made, including the impacts on these characteristics from quarrying activities. • A complete historic and archaeological survey should be carried out. • Particular attention should be given to identifying and protecting especially old trees within the ancient woodland. • Evidence is requested to demonstrate successful reinstatement of woodland topsoil following previous 	<p>East Malling and Larkfield Parish Council</p>	<ul style="list-style-type: none"> • This is recognised in the technical assessment. Part of the site is recognised as ancient woodland, being a Plantation on Ancient Woodland Site (PAWS). A PAWS site is where native trees were cleared and replaced by non-native plantations, in this case a sweet chestnut managed woodland, and is recognised as an irreplaceable habitat including the woodland features as undisturbed soil, ground flora and fungi. It is acknowledged that the development (quarrying for aggregate minerals) would result in the loss of PAWS. Any PAWS losses as a consequence of quarrying have to be justified by “wholly exceptional reasons”, together with a suitable compensation strategy. The assessment of whether wholly exceptional reasons exist considers economic, social and environmental matters. This includes the need to plan for a steady and adequate supply of primary land-won aggregates to meet defined markets over the plan period and the socio-economic and environmental benefits that accrue from maintaining a local supply. The Council is satisfied that wholly exceptions reasons exist and a suitable compensation strategy can be demonstrated, and so the DM 2 policy test could be satisfied. A separate report addressing this matter has been prepared. • Quarrying impacts such as dust and noise (including vibration) are material concerns and subject to mitigation that can be secured via strengthened development management criteria and future planning conditions- These matters will be considered further at any detailed planning application stage. • The nominated site for quarry operations would be progressively restored to woodland. • Noted. The PROW would need to be temporally diverted and reinstated at end of site restoration. Any re-routing would require the support of the Public Rights of Way officer. • Sufficient detail has been considered at the plan making stage to establish that the development is acceptable in principle. Furthermore, detailed assessment would be required at the planning application stage. • Archaeological assessment has been undertaken in consultation with English Heritage. Detailed assessment conducted by Wessex Archaeology found that the site had limited potential. At planning application stage, further detailed assessment on archaeology and any heritage assets would be required in accordance with the Mineral Sites Plan Development Management Criteria, with mitigation secured by planning condition. • The Woodland Trust’s Ancient Tree Inventory does not record any veteran trees on site. It recognises one notable oak as a mature tree. A Tree Preservation Order (TPO) is present on part of the site. This was put into force to maintain the sweet chestnut coppice woodland. Any effects on trees subject to a TPO would be assessed through the planning application process and controlled through any permission and associated conditions. • The Secretary of State’s earlier decision on the compensation package which involved the translocation of soils is

<p>quarrying, to prove the feasibility of restoration.</p>		<p>now showing signs of success. However, the precise compensation details would be part of any detailed planning application, with woodland habitat creation as compensation secured through strengthened development management criteria and planning conditions,</p>
<ul style="list-style-type: none"> • Questions whether KCC is the appropriate body to judge the site's merits, arguing approval should wait for Planning Inspectorate consideration. • Any diversion of existing PROW) must be to newly established, permanent routes. Calls for legally enforceable, permanent commitments from the site owner to existing and newly established paths and dedicate a significant proportion of reinstated land for community use. • Powerline diversion proposals must consider scientific evidence on potential long-term health impacts of living near overhead powerlines. Rerouted paths could increase risk to residents living near the new alignment. • Blast vibration reports are criticised for: <ul style="list-style-type: none"> ○ Not showing precise blast locations ○ Lacking clear descriptions of weather conditions during blasting ○ Missing scales on particle velocity graphs ○ Having unclear y-axis labelling • Concerns raised about whether KCC has sufficient expertise when reviewing blast monitoring data and ensuring compliance with KCC's <i>Guidance on blasting ragstone quarries in Kent (May 2021)</i>. Air overpressure impacts could increase by up to 18 dB for homes in Teston. 	<p>Teston Parish Council</p>	<ul style="list-style-type: none"> • As the Mineral Planning Authority, the County Council is required to prepare a Mineral Sites Plan that is independently examined by the Planning Inspectorate. • Public rights of way (PROW) are required to be maintained and reinstated by law. Other than the bridleway through the site, the land is private and the public has accessibility through permissive paths. This is intended to continue. • If required, the diversion of the power lines would be assessed against the statutory processes, including health impacts on local communities. • Noted – this is a matter for any detailed planning application stage to demonstrate in accordance with the strengthened Mineral Sites Plan Development Management Criteria and Government guidance on the control and monitoring of blasting in quarry operations. Moreover, quarrying impacts such as vibration are material concerns, and subject to mitigation that can be secured via strengthened development management criteria and future planning conditions. These matters will be considered further at any detailed planning application and in accordance with best practice and guidance. Assessment is undertaken by experienced planning officers, with input from technical advisors as necessary. • The guidance contained in <i>Guidance on blasting ragstone quarries in Kent (May 2021)</i> focusses on minimising environmental impacts and protecting neighbours through regulated, monitored blasting schedules. The key practices include managing vibration, controlling airborne noise and utilising specific blasting sequences to reduce impacts, particularly to local residents.
<ul style="list-style-type: none"> • Objects the proposal as it is viewed as out of touch with the climate crisis, the irreplaceability of ancient woodland, and the rare/diverse species that inhabit Oaken Wood 	<p>Fawkham Parish Council</p>	<ul style="list-style-type: none"> • The County Council, as the Mineral Planning Authority (MPA) is required by the NPPF to have planning policies to ensure a steady and adequate supply of aggregate minerals to meet specific market demands. In Kent this includes aggregate formed from hard (crushed) rock. • This concern is recognised in the technical assessment. Part of the site is recognised as ancient woodland, being a Plantation on Ancient Woodland Site (PAWS). A PAWS site is where native trees were cleared and replaced by non-native plantations, in this case a sweet chestnut managed woodland, and is recognised as an irreplaceable habitat including the woodland features as undisturbed soil, ground flora and fungi. It is acknowledged that the development (quarrying for aggregate minerals) would result in the loss of PAWS. Any PAWS losses as a consequence of quarrying have to be justified by “wholly exceptional reasons”, together with a suitable compensation strategy. The assessment of whether wholly exceptional reasons exist considers economic, social and environmental matters. This includes the need to plan for a steady and adequate supply of primary land-won aggregates to meet defined markets over the plan period and the socio-economic and environmental benefits that accrue from maintaining a local supply. The Council is satisfied that wholly exceptions

		reasons exist and a suitable compensation strategy can be demonstrated, and so the DM 2 policy test could be satisfied. A separate report addressing this matter has been prepared.
<ul style="list-style-type: none"> Hermitage Quarry site has good access to the Strategic Highway Network, and schemes are coming forward at Coldharbour Roundabout and in terms of the Whitepost Field link road which will further improve access, but the route is very sensitive at peak times. The local area has seen considerable new housing development over the past few years, and more is anticipated. Suggest an Amber category would be more appropriate with conditions to cap HGV movements during peak traffic periods. 	KCC Highways	<ul style="list-style-type: none"> Noted
<ul style="list-style-type: none"> Public Bridleway MR108 runs through the site, raising concerns about impacts on a key strategic link across the wider area. Although PROW diversions are mentioned, no details are provided on the proposed legal mechanisms. Any diversion would need to be formally agreed with the PROW and Access Service as the Highway Authority for PROW. 	KCC PROW	<ul style="list-style-type: none"> Noted
<ul style="list-style-type: none"> Any future allocation/ application/consent is clear that the works/traffic movements represent a continuation of, rather than being in any way additional to, current operations. The conditions cover all activities at the site and the operational working plans/ travel plans etc, plan for and achieve what realistically can be by way of sustainable travel, and minimising single use one-way trips if vehicles could reasonably perform multiple tasks and hence be loaded for inward and outward movements. The supporting evidence is considered suitably up-to-date, relevant and robust. This should include not only including WEBTAG commitments but also appropriately covering/ having narrative in relation to other material factors. For example, in addition to the schemes you mention at Coldharbour Roundabout and the Whitepost Field link road, the A20 London Road/ Coldharbour Road junction has been improved by KCC but is likely to be subject to further works assuming the Costco proposals come forward. Therefore, at least having sensitivity testing of "known knowns" would assist to see if there are any 	National Highways	<ul style="list-style-type: none"> The County Council highways authority remains of the view that sufficient highway capacity exists to allow the continuation of present levels of generated HGV traffic. The site has good access to the Strategic Highway Network, and schemes are coming forward at Coldharbour Roundabout and in terms of the Whitepost Field link road which will further improve access. However, the route is very sensitive at peak times, the local area attracted housing development over the past few years, and more is anticipated in the future. It may be appropriate to cap HGV movements during peak traffic periods with any planning permission conditions. It is not considered necessary that further sensitivity testing for additional potential highways or development scenarios should be undertaken to inform the County Council Highway Authority view that continued quarrying at the Hermitage Quarry site may be acceptable. The key highways mitigation here is to continue with a robust cap on HGV movements, particularly for the peaks. Costco is still a pre app and they will need to present us with evidence as to their impact and potential mitigation. Coldharbour roundabout and A20/ London Road Coldharbour junction are the same scheme which was completed last year.

<p>cumulative issues. Whether and who might need to mitigate them would be separate matter.</p>		
<p>Draws attention to the following policies from the South East Inshore Marine Plans:</p> <ul style="list-style-type: none"> • SE-INF-1: Supports land-based infrastructure that facilitates marine activity. • SE-INF-2: Alternative development at existing safeguarded landing facilities will not be supported. • SE-DD-1: Other activities will not be supported in areas of authorised dredging unless compatible with dredging activity. • SE-DD-2: Developments causing significant adverse impacts on licensed disposal areas are discouraged. • SE-DD-3: Disposal of dredged material must demonstrate compliance with the waste hierarchy. • SE-PS-1: Supports proposals compatible with current and future sustainable port and harbour activity. • SE-PS-4: Supports proposals that promote sustainable coastal or short-sea shipping as alternatives to road, rail or air transport. • SE-HER-1: Proposals should conserve and enhance heritage assets. Where harm is unavoidable, mitigation must be demonstrated, and public benefits must outweigh harm. • SE-EMP-1: Supports proposals that increase marine-related employment, particularly where they create jobs in deprived areas. • SE-CC-1: Supports developments that enhance habitats, flood defence or carbon sequestration. Where adverse impacts occur, proposals must avoid, minimise, mitigate, or compensate and deliver environmental net gains. • SE-CC-2: Requires proposals to demonstrate long-term resilience to climate and coastal change. • SE-CC-3: Proposals likely to cause significant adverse impacts on coastal change should not be supported. 	<p>Marine Management Organisation (MMO)</p>	<ul style="list-style-type: none"> • Noted. The majority of the MMO policy comments relate to the now adopted KMWLP 2024-39 and its established policy framework.
<ul style="list-style-type: none"> • An initial assessment indicates that development south and west of Hermitage Quarry would have only limited minor adverse impacts on nearby heritage assets. • If the site were allocated, a more detailed archaeological and heritage impact assessment would be required before any development takes place. • KCC's Heritage Team is considered well placed to advise on these matters. Additional advice should also be sought from conservation officers at 	<p>Historic England</p>	<ul style="list-style-type: none"> • Noted. • This would be a requirement as part of any planning application process. Archaeological assessment has been undertaken by the County Council and in consultation with English Heritage. Detailed assessment conducted by Wessex Archaeology found that the site had limited potential. If any planning application were made, further detailed assessment on archaeology and any heritage assets would be required and any mitigation secured by condition. • The County Council, in its heritage conservation responsibilities regards further supplies of appropriately sized and graded dimension stone from the Hythe Formation as important for the continuation or the conservation and preservation of historic structures in Kent and beyond constructed of Kentish Ragstone. Both Tonbridge & Malling

<p>Tonbridge & Malling Borough Council (TMBC) and Maidstone Borough Council (MBC).</p>		<p>Borough Council (TMBC) and Maidstone Borough Council (MBC) have been consulted and have not raised any matters that contradict the County Council's Conservation Officer's view.</p>
<ul style="list-style-type: none"> Oaken Wood Site of Special Scientific Interest (SSSI) it is unclear if the nominated site boundary overlaps the SSSI, direct and indirect impacts are likely to result from the development of the nominated site NE would expect the County Council to fully exhaust all alternative means of delivery of the identified hard rock requirements including the use of recycled materials in meeting the identified needs set out in the NPPF at Section 17, para 210 and 211. The NPPF para.180 b) states that development within or outside a SSSI that is likely to cause an adverse effect (individually or in combination with other developments) should normally be refused, the only exception where the benefits in the location clearly outweigh the reason for SSSI status and the broader SSSI network. Policy DM 2 of the adopted KMWP provides strong SSSI protection. If the County Council is minded to proceed a detailed assessment of any direct and non-direct impacts on the features of the SSSI and the SSSI network should be tested through the SA. The proposed nominated site would coincide with an area of replanted ancient woodland. This is irreplaceable ancient woodland habitat and is afforded strong policy protection by NPPF Section 180 c) that requires development that would result in the loss or deterioration of irreplaceable habitats (such as this is) should be refused unless there are wholly exceptional reasons and a suitable compensatory strategy. Policy DM 2 strategy of the adopted KMWP provides strong protection. Ancient woodland soils even where replanted have the same level of protection as they contain the ancient woodland features, such as undisturbed soil, ground flora and fungi and have the same protection as ancient semi-natural woodland mainly made up of trees and shrubs native to the site, usually arising 	<p>Natural England</p>	<ul style="list-style-type: none"> The SSSI is a geomorphological feature that demonstrates a Pleistocene "ridge and trough" topography and is beyond the area that would be subject to quarrying operations. There is a buffer between the SSSI, and the area proposed to be worked, and therefore no direct impacts. At the planning application stage, a detailed assessment of the potential impacts of blasting, including on the SSSI, will be undertaken and the boundary of the working area will be adjusted as necessary to minimise unacceptable adverse impacts. The development management criteria for this site have been updated in the Pre-Submission Draft Plan to ensure this matter will be properly accounted for. The substitution of the nominated site hard rock supply with recycled materials will not provide the required primary aggregate needs identified in the KMWLP. The NPPF (2024) requires land-banks of primary aggregate to be maintained to meet identified needs of a specified type which have a distinct market. Crushed rock requires a defined landbank to meet the requirements for a set of distinct construction markets that include high specification structural concrete uses, that recycled/secondary materials cannot meet. The site is a practical, deliverable indigenous source of hard rock in particular because it is contiguous with existing quarry infrastructure. Other aggregate sources and import infrastructure exist but do not provide the same level of supply certainty. There is no clear acceptable alternative source of Ragstone for heritage purposes. The NPPF (2024) Section 193 b) does not specify between habitat/ecological SSSI and those that relate to geomorphological SSSI. The reference to KMWLP Policy DM 2 indicates that NE is concerned for the habitat/ecological SSSI. This is not the case in proximity to the nominated site. The proximate SSSI is a geomorphological feature designated in 1985, as it demonstrates a rare Pleistocene "ridge and trough" topography and is outside the area that would be subject to quarrying operations. Therefore, the nominated hard rock site does not affect this feature directly. Indirect effects would be limited to any potential for hard rock quarry operations, potentially from blasting. However, these are highly specified and regulated in terms of what are acceptable limits for peak particle velocities at sensitive receptors outside the quarry boundaries. If quarry operations were conducted in the nominated site area residential property, as sensitive receptors, would be closer than the SSSI feature and therefore, maintenance of appropriate blasting limitations to prevent adverse impacts at these receptors would ensure that the physical state of the geomorphological SSSI would not be impacted in a way that would cause its deterioration, or on any definable geomorphological SSSI network. This matter has been addressed in the SA. The Plan's development management criteria have been updated to address this matter further. Part of the site is recognised as ancient woodland, being a Plantation on Ancient Woodland Site (PAWS. A PAWS site is where native trees were cleared and replaced by non-native plantations, in this case a sweet chestnut managed woodland, and is recognised as an irreplaceable habitat including the woodland features as undisturbed soil, ground flora and fungi. It is acknowledged that the development (quarrying for aggregate minerals) would result in the loss of PAWS. Any PAWS losses as a consequence of quarrying have to be justified by "wholly exceptional reasons", together with a suitable compensation strategy. The assessment of whether wholly exceptional reasons exist considers economic, social and environmental matters. This includes the need to plan for a steady and adequate supply of primary land-won aggregates to meet defined markets over the plan period and the socio-economic and environmental benefits that accrue from maintaining a local supply. The Council is satisfied that wholly exceptions reasons exist and a suitable compensation strategy can be demonstrated, and so the DM 2 policy test could be satisfied. A separate report ('Hermitage Quarry Suitability for Allocation Assessment Report') addressing this matter has been prepared. <p>Progressive restoration and increased overall native species of broad leaf woodland and management, along with the translocation of soils is proposed to demonstrate that a required 'suitable compensation strategy' could</p>

<p>from natural regeneration. If the County Council is minded to proceed to a detailed assessment of any direct and indirect impacts along with methods for avoidance and mitigation should be part of the Plan and be tested through SA and the draft development management criteria.</p> <ul style="list-style-type: none"> • The Kent Downs Area of Outstanding Beauty (KDAOB) could have their setting affected given the scale of the proposed nominated site. Para. 176 of the NPPF gives great weight to the conserving and enhancing landscape and scenic beauty in National Parks, and AONB (now designated as National Landscapes) designated areas. KMWLP Policy DM 2 similarly affords great weight to be given to conserving the landscape so designated and scenic beauty. The policy also addresses the need to ensure that the setting of this landscape designation. If the County Council is minded to proceed with the allocation of the site, a detailed landscape assessment of the impact, and any mitigation measures proposed, should be provided as part of the future iterations of the Plan and tested through the SA. • The area's soil should be given appropriate weight when considering the nominated site. These are valued as a finite multi-functional resource (as demonstrated in the Natural Environment White Paper: The Natural Choice: securing the value of nature, Defra June 2011) this should be reflected in the Plan. This vision sets out the need to protect soils as an essential part of life, the environment being made up of air, biodiversity, soil and water. Soil safeguarding is essential for securing a range of important ecosystem services and functions, including food production, carbon storage and climate regulation, water filtration, flood management and supporting biodiversity and wildlife including the protection of 'best and most versatile' agricultural land. The NPPF in para. 170,171 and 204 reflect these concerns by stating that when planning authorities are considering land use change, the permanency of the impact on soils is an important consideration. This includes safeguarding the long-term capability of best and most versatile agricultural land (Grades 1,2 and 3). • In summary NE is concerned with the nature and 		<p>be prepared at the application stage. Any allocation is dependent upon demonstrating a suitable compensation strategy could be provided, that provides for a net gain of some 112ha of new native planting and enhanced management of existing woodland. The total proposed native woodland creation and enhancement equate to some 154 ha, which would be created compared to the 42ha of non-native woodland (including 41ha of PAWS) which is assumed would be lost to facilitate mineral working. This equates to a 266% increase of native mixed species woodland (by creation and enhancement). The strategy includes the translocation of PAWS soils. The proposed measures are considered acceptable to demonstrate the policy test can be satisfied and has been considered by the Plan's accompanying SA. Details of how a planning application could demonstrate a suitable compensation strategy is expanded upon in the Pre-Submission Draft Plan's strengthened development management criteria.</p> <ul style="list-style-type: none"> • Since the Regulation 18 consultation, further landscape and visual assessment has been undertaken to inform the Council's consideration of the nominated site. The site is not located within the Kent Downs National Landscape, and the designation lies approximately 4km to the north-west of the site. The assessment has considered the potential for indirect effects on the setting of the National Landscape, including through desk-based visibility analysis. It concludes that, having regard to distance, intervening landform and woodland cover, there is no meaningful visibility between the proposed working area and elevated receptors within the Kent Downs National Landscape, and that significant effects on the setting of the designation are not anticipated. <p>The Council therefore considers that the proposed allocation would not result in unacceptable adverse effects on the Kent Downs National Landscape. Any future planning application would nevertheless need to be supported by a detailed Landscape and Visual Impact Assessment and would be required to demonstrate appropriate mitigation, including phased working, retention of woodland buffers, advance planting, bunding where necessary, and progressive restoration. This matter has been assessed by the SA. The Plan's development management criteria have been updated to address this matter further.</p> <ul style="list-style-type: none"> • During the excavation phases of the development soil loss will occur, however this will be temporary as the proposed restoration to mainly native broad leaf woodland requires soil and soil health to be maintained. The use of ancient woodland soils translocation as part of this process would be an appropriate part of the restoration methodology and help ensure that overall soil losses are minimised. Prior to excavation other soils would be stripped and stockpiled for use as part of the restoration. <p>The impact on agricultural soils has been considered as part of the assessment. The agricultural land grade of the relatively small non-woodland areas is considered to be Grade 2 (Very good) to Grade 3 (Good to Moderate). The intention is to use these areas for compensatory broadleaf woodland planting to compensate for the loss of ancient woodland (PAWS) soils. Fundamentally it is not the intention to 'lose' any soil as their retention and management would be part of any detailed restoration scheme. The details of which would be the subject of consideration at any planning application stage and informed by the Plans strengthened development management criteria.</p>
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<p>scale of the impacts that the nominated site would have and regards the SA may have underestimated these impacts. Ancient woodland habitat is an irreplaceable characteristic; it is not possible to compensate for direct loss of this habitat. It is therefore recommended to the County Council that undertake comprehensive and independent consideration of whether there are alternative sites or sources of material that will avoid or result in lessor overall environmental impacts. Such an assessment should include landscape, nature and geological conservation and soil considerations in addition to the socio-economic impacts of progressing with the nominated site. Once undertaken and if the County Council considers there are exceptional circumstances to justify the allocation and the site proceeds to an allocation in the Plan the SA and Development Management policies should be updated to reflect the results of the impact assessment and any mitigation and compensation measures proposed (whilst acknowledging that it is not possible to compensate for the loss of irreplaceable woodland habitat. As this would accord with the 'avoid, mitigate, compensate' hierarchy element of the NPPF.</p>		<ul style="list-style-type: none"> The detailed technical assessment has considered the relevant environmental, social and economic elements relating to the potential allocation of the nominated site. This includes internal and external specialist advice and consultation with statutory consultees and relevant interested parties and the wider public. This included a detailed re-appraisal of the exercise conducted in the past to identify suitable sites within the Hythe Formation that can yield both the required grade of construction aggregate and the necessary dimension stone for heritage conservation uses. The Council conducted two Call for Sites exercises to ensure the opportunity for other landowners and mineral operators to come forward with any suitable alternative site. None have. The only reasonable alternative to continued hard rock land-won supply in Kent (as the NPPF requires landbanks to be specifically maintained for) at this time is to allow increased importation of hard rock and accept the increased carbon emissions that this would entail and reduced certainty associated with this supply option. Recycled aggregate materials would not have the essential primary aggregate characteristics to be a suitable substitute. The irreplaceability of ancient woodland habitat is understood by the County Council and, taking account of the conclusions in the Hermitage Quarry Suitability for Allocation Assessment Report, it is of the view that at this in principle, plan making stage the "wholly exceptional circumstances" and "suitable compensation strategy" NPPF (2024) tests to have been met. This does not mean that the County Council is unaware that there would be impacts on both the ancient woodland, even with soils translocation efforts, or impacts on the setting of the Kent Downs National Landscape. However, the County Council is of the view that landscape impacts can be minimised and mitigated by progressive restoration of any quarried area and a suitable compensation strategy can be demonstrated including by the creation of on and off-site woodland habitats. The Plan's development management criteria have been extensively updated to ensure these matters would be addressed in further detail at the planning application stage.
<p>Groundwater and Contaminated Land</p> <ul style="list-style-type: none"> The proposed hard rock site is adjacent to an existing quarry/inert landfill at Hermitage Lane. Additional groundwater risk assessments would be required to support any future planning application. The Sustainability Appraisal (SA) and RAG assessment acknowledge groundwater risks, but precautionary measures would still be expected. Any restoration involving landfilling should be restricted to inert waste only, consistent with current environmental permitting. The Environment Agency would object in principle to non-inert waste disposal due to: <ul style="list-style-type: none"> The site's location on a principal aquifer The likelihood that non-inert waste would require long-term site 	<p>Environment Agency</p>	<ul style="list-style-type: none"> Noted. Noted, this will be addressed at the detailed planning application stage and would be required to be in accordance with the strengthened Mineral Sites Plan Development Management Criteria for water resources. The promoted site's maximum depth of extraction is intended to be above recorded groundwater level and in accordance with advice from Environment Agency. Infilling the quarried void would be subject to the Environment Agency's waste management permitting requirements to prevent pollution by controlling what waste inputs are permitted. Noted, inert wastes are currently used in the restoration of the existing quarried void. It is the stated intention of the promoter of the nominated site that this would continue in any extended area. Noted, any detailed planning application stage would have to detail how landfill operations were to be conducted and pollution risk mitigated to satisfy the Environment Agency to be in accordance with the strengthened Mineral Sites Plan Development Management Criteria for water resources. Noted. It is not the stated intention of the promoter of the nominated site to depart from the use of inert material inputs for restoration purposes.

<p>management.</p> <ul style="list-style-type: none"> • Landfill proposals are opposed where risk assessments show unacceptable risks, particularly: <ul style="list-style-type: none"> ○ Below the water table ○ Within groundwater Source Protection Zones (SPZ2 or SPZ3) ○ On or within a principal aquifer ○ Concerns are raised that quarrying, or restoration could affect northward groundwater flow within the aquifer. ○ A Hydrogeological Risk Assessment (HRA) would be required where groundwater resources could be impacted. • If unacceptable risks cannot be mitigated, the Environment Agency would object or seek restrictive planning conditions. • Any physical disturbance, lowering of groundwater levels, or interception of groundwater flow would need to provide protection equivalent to that required for licensable abstractions. <p>Fisheries, Biodiversity and Geomorphology</p> <ul style="list-style-type: none"> • Previous concerns remain that the plan's language is unclear and does not define what constitutes "unacceptable impacts". • Ancient woodland is an irreplaceable habitat and cannot be genuinely compensated for. 		<ul style="list-style-type: none"> • Noted. Any planning application would have to accord with these water resource protection criteria and be compliant with Policy DM 10: Water Environment of the adopted Kent Minerals and Waste Local Plan 2024-39. The Environment Agency would be consulted upon at any detailed planning application stage. • Noted. • Noted. • Unacceptable impacts on environmental assets (habitats, geomorphological features etc) will be more precisely defined through consultation with statutory consultees at the detailed planning application stage. • Part of the site is recognised as ancient woodland, being a Plantation on Ancient Woodland Site (PAWS. A PAWS site is where native trees were cleared and replaced by non-native plantations, in this case a sweet chestnut managed woodland, and is recognised as an irreplaceable habitat including the woodland features as undisturbed soil, ground flora and fungi. It is acknowledged that the development (quarrying for aggregate minerals) would result in the loss of PAWS. Any PAWS losses as a consequence of quarrying have to be justified by "wholly exceptional reasons", together with a suitable compensation strategy. The assessment of whether wholly exceptional reasons exist considers economic, social and environmental matters. This includes the need to plan for a steady and adequate supply of primary land-won aggregates to meet defined markets over the plan period and the socio-economic and environmental benefits that accrue from maintaining a local supply. The Council is satisfied that wholly exceptions reasons exist and a suitable compensation strategy can be demonstrated, and so the DM 2 policy test could be satisfied. A separate report addressing this matter has been prepared. <p>Progressive restoration and increased overall native species of broad leaf woodland and management, along with the translocation of soils is proposed to satisfy the required 'suitable compensation scheme'. Any allocation is dependent upon a suitable compensation strategy, which provides for a net gain of some 112ha of new native planting and enhanced management of existing woodland. The total native woodland creation and enhancement equate to some 154 ha, which would be created compared to the 42ha of non-native woodland (including 41ha of PAWS) which is assumed would be lost to facilitate mineral working. This equates to a 266% increase of native mixed species woodland (by creation and enhancement). The strategy includes the translocation of</p>
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<ul style="list-style-type: none"> The current RAG conservation assessment is disputed and should be rated Red, given: <ul style="list-style-type: none"> The size of Oaken Wood The scale and significance of potential impacts Loss of ancient woodland at this scale would be of national significance. It is unclear how such losses could be reconciled with the legal requirement to achieve Biodiversity Net Gain (from November 2023). <p>Flood Risk</p> <ul style="list-style-type: none"> Any planning application for the site would need to be supported by a detailed Flood Risk Assessment. The assessment should identify appropriate measures to minimise and/or mitigate flood risk. 		<p>PAWS soils. This strategy is considered acceptable to satisfy the policy test and has been considered by the Plan's accompanying SA. Details of how a planning application could demonstrate a suitable compensation strategy is expanded upon in the Pre-Submission Draft Plan's strengthened development management criteria.</p> <ul style="list-style-type: none"> The initial RAG assessment work has been considered further as part of the detailed technical assessment work. This is recognised in the technical assessment. Part of the site is recognised as ancient woodland, being a Plantation on Ancient Woodland Site (PAWS) and a Local Wildlife Site. A PAWS site is where native trees were cleared and replaced by non-native plantations, in this case a chestnut managed woodland and is recognised as an irreplaceable habitat. PAWS losses as a consequence of quarrying have to be justified by a "wholly exceptional reasons" test, and a suitable compensation strategy, where the need for the development (quarrying for aggregate minerals) justifies the identified loss. In assessing the proposal, policy consideration is also required to balance the economic, social and environmental matters. This includes the need to plan for a steady and adequate supply of primary land-won aggregates to meet defined markets over the plan period. The Council is satisfied that wholly exceptional reasons exist and a suitable compensation strategy can be demonstrated, satisfying the policy test. <p>Allocation is dependent upon a suitable compensation strategy, which provides for a net gain of some 112ha of new native planting and enhanced management of existing woodland. The total woodland creation and enhancement equate to 154 ha, which would be created compared to the 42ha woodland (including 41ha of PAWS) which is assumed would be lost to facilitate mineral working. This equates to a 266% increase of native mixed species woodland (by creation and enhancement). The proposals include the translocation of PAWS soils. Taken together it is considered that this demonstrates a suitable compensation strategy could be achieved to satisfy the policy test.</p> <ul style="list-style-type: none"> Biodiversity Net Gain (BNG) is a mandatory requirement for planning permission. As the site affects an irreplaceable habitat a compensation strategy is required, to which BNG does not contribute. The comments regarding flood risk are noted and would be addressed at the detailed planning application stage.
<p>Sharp Sand and Gravel Allocated Site - Stonecastle Farm Quarry</p>		
<ul style="list-style-type: none"> Disagrees with the proposed changes to the requirements for sharp sand and gravel. Unclear about the evidence supporting the new wording in paragraph 2.14 regarding sharp sand and gravel. 	<p>Gravesham Borough Council</p>	<ul style="list-style-type: none"> KMWLP Policy CSM 2 details the landbank and aggregate requirements for the Plan period to 2024-39. The methodology was the subject of the Plan's examination. The policy allows for the update of requirements based on the most recent LAA data. The LAA 2025 (2024 data) demonstrates that over the KMWLP period there will be a 1.6mt surplus of sharp sands and gravel given current landbanks and the injection of 2.5mt from the Mineral Sites Plan allocations. The evidence supporting the need for any allocation is derived from the Aggregate Mineral (AM) survey that is undertaken annually and demonstrates available reserves and sales. The data is used to inform if further allocations is required over the Plan period.

<ul style="list-style-type: none"> • The proposed changes indicate a shortfall in supply over the Plan period, leading to increased reliance on importation. • Suggests incorporating a mechanism for monitoring and early review of the need for additional allocations, similar to the approach for soft sand. 		<ul style="list-style-type: none"> • There will be a surplus over the entire Plan period of sharp sand and gravel given available data from AM 2025 (2024 data) • The process for assessing need for sharp sand and gravel is the same as soft sand and is achieved with the AM data and the LAA process.
<ul style="list-style-type: none"> • Active lobbying has taken place regarding Stonecastle Farm due to concerns about additional disruption from the quarry extension. • There is a strong need for mitigation measures to reduce impacts on the local community. Mitigation should include the provision of public open space for walkers and horse riders, and potentially cyclists. It is strongly recommended that such mitigation is made a formal condition of any further quarrying permission. • Former quarry areas could be made accessible for recreation while quarrying continues elsewhere. • Mitigation measures should be delivered within a specified and early timeframe. • The local area is poorly served by higher-status PROW. • An off-road bridleway network would help offset safety risks and inconvenience caused by increased HGV traffic on the A228 and surrounding roads. 	British Horse Society	<ul style="list-style-type: none"> • The site is an allocated site in the Kent Mineral Sites Plan (MSP), having been found sound at the previous local plan examination. The review of this plan does not seek to de-allocate the site. All public access via defined bridle ways and designated PROW will have to be maintained during any mineral activity. Any directly affected PROW would need to be temporarily re-routed and reinstated as part of an agreed restoration plan. Any re-routing would require the support of the Public Rights of Way officer. These matters would be assessed via a detailed planning application and secured via condition.
Soft Sand Allocation - Chapel Farm		
<ul style="list-style-type: none"> • Soft Sand Provision: Soft sand is a strategic cross-boundary matter. • East Sussex relies on imports for soft sand, and the SDNPA will respond to the Kent Plans. ESCC endorses the response from the SDNPA. 	East Sussex County Council	<ul style="list-style-type: none"> • Noted, soft sand (Folkestone Formation) is a strategic land-won mineral that is not readily substituted and thus its extraction has significant potential for protected landscape impacts. • Noted.
<ul style="list-style-type: none"> • Disagrees with the proposed changes to the requirements for soft sand. 	Gravesham Borough Council	<ul style="list-style-type: none"> • KMWLP Policy CSM2 details the landbank and aggregate requirements as needed for the Plan period to 2024-39. The methodology was the subject of the Plan's examination. The policy allows for the update of requirements based on the most recent LAA data. With the allocation of 3.2mt of further soft sand, and based on the 2024 data, there will be sufficient sand to meet the NPPF 7-year landbank to 2035 (assuming windfall of some 0.84mt from Otterpool new settlement as a prior extraction to safeguard mineral resources). By 2035 there will have been several plan review cycles that would inform the County Council if further allocation were required. At no time to 2039 will supplies be exhausted

<p>The provision of soft sand is a strategic issue for the South East Mineral Planning Authorities (MPAs). The soft sand resource in Kent and the SDNPA is contained within the Folkestone Formation, which extends across several counties. The ability to identify soft sand resources is constrained by the SDNP designation.</p> <ul style="list-style-type: none"> • The primary purpose is to conserve and enhance the natural beauty, wildlife, and cultural heritage. Promote opportunities for public understanding and enjoyment of the National Park's special qualities. Foster the social and economic wellbeing of local communities within the National Park. • Paragraph 176: Emphasises the importance of conserving and enhancing landscape and scenic beauty in National Parks. • Paragraph 177: States that major development in National Parks should be refused unless there are exceptional circumstances and it is in the public interest. <p>Soft Sand (SS) Position Statement (2019):</p> <ul style="list-style-type: none"> ○ High Reserves in Kent: Kent has one of the highest reserves and sales of soft sand in the South East. Need for Additional Sites: Additional sites need to be allocated and permitted to ensure a steady and adequate supply. Soft Sand (SS) Statement of Common Ground (SoGC) [July 2022]: ○ Safeguarding Resources: SS resources will be safeguarded in MWLP. Provision Outside Designated Areas: Provision for landbanks of SS should be made outside the SDNP and AONBs as far as practical. ○ Regional Supply: Any surplus in Kent is acknowledged as having potential to meet a wider regional need. ○ Despite the allocation at Chapel Farm West, Lenham, there is still a shortfall of 2.15 million tonnes of SS. ○ LAA: KCC needs to use their LAA to assess demand, including from other areas like East Sussex. <ul style="list-style-type: none"> • Call for Additional Sites: Encourages exploring opportunities for additional Soft Sand sites outside designated areas to meet regional needs. • Draws attention to the strengthening of National Park 	<p>South Downs National Park</p>	<ul style="list-style-type: none"> • This is agreed, the Folkestone Formation is of a strategic nature to the Southeast England Mineral Planning Authorities (SEEMPAs) and the South Downs National Park (SDNP) is a potential constraint to future supply. • Paragraphs. 176 and 177 relate to the KMWLP 2024-39 now adopted. • The Soft Sand Position Statement 2019 is still of relevance, though the latest LAA 2025 with data to the end of 2024 demonstrates the Kent position on the 7-year maintained soft sand landbank. This is estimated to technically cease in 2035, 4 years short of the end of the KMWLP period of 2039. However, by 2035 the KMWLP will be in its second statutory review cycle since adoption in 2025. Therefore, the potential need to allocate additional sites for maintaining sufficient supply to meet the NPPF maintained 7-year landbank requirement at the end of the plan period (2039) will have been factored into several reviews of the Kent MSP. The Planning Inspectorate accepted this approach and that there was no requirement to allocate further sites at this time. • The LAA monitoring report is predicated by aggregate monitoring (AM) data and the most recent 2024 data, in conjunction with anticipated safeguarding windfall supplies of potentially 1.0mt, demonstrates that a 7-year landbank will continue to 2035 and no exhaustion by 2039. • Accuracy over reserves and landbanks is a matter detailed in the most recent LAA2025 that uses data to the end
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<p>purposes through Section 245 of the Levelling Up and Regeneration Act 2023, updates to the National Planning Policy Framework, updates to the South East Soft Sand Position Statement, and adoption of the East Sussex, South Downs, and Brighton & Hove Waste and Minerals Revised Policies Document.</p>		<p>of 2024. This demonstrates that the Kent position on the 7-year maintained soft sand landbank is estimated to technically cease in 2035 - 4 years short of the end of the KMWLP period to 2039. This matter was considered at the examination for the KMWLP which was adopted in 2025 and found that there was no requirement to allocate further soft sand sites at this time. The potential need for further soft sand site allocation to meet identified needs will be addressed in future reviews of the MSP. The Council is currently considering a planning application for the allocated site at Chapel Farm.</p>
<ul style="list-style-type: none"> • The Further Changes Consultation states that the Minerals Planning Authority (MPA) will have a 10.73-year landbank at the start of the plan period. • Questions the accuracy of landbank data, citing past errors in reserve re-evaluations between the 2021 and 2022 Local Aggregate Assessments. • Permitted reserve figures are considered imprecise as they rely on annual operator reporting. • Commercial confidentiality prevents independent verification of reserve data. • There are concerns operators may under- or mis-report reserves to avoid highlighting planning breaches or reducing site value. • Recent figures show the 3-year sales average (0.468mt) now exceeds the 10-year average (0.456mt). • Soft sand supply has worsened since the previous Local Plan consultation (Oct–Dec 2022). • A 4% increase in year-on-year sales (2021–2022) has been recorded. • The existing landbank has reduced significantly between consultations, increasing the projected shortfall by the end of the plan period. • No public evidence confirms that Chapel Farm will come forward earlier than its anticipated start date (before 2034). • If sales averages remain consistent, the MPA may be unable to demonstrate a 7-year landbank by 2027/28. • This could create a gap between 2027/28 and 2034 with no compliant landbank. • The soft sand supply strategy is therefore heavily reliant on Chapel Farm coming forward on time. 	<p>Invicta Planning Ltd</p>	<ul style="list-style-type: none"> • Accuracy over reserves and landbanks is a matter detailed in the most recent LAA2025 that uses data to the end of 2024. This demonstrates that the Kent position on the 7-year maintained soft sand landbank is estimated to technically cease in 2035 - 4 years short of the end of the KMWLP period to 2039. This matter was considered at the examination for the KMWLP which was adopted in 2025 and found that there was no requirement to allocate further soft sand sites at this time. The potential need for further soft sand site allocation to meet identified needs will be addressed in future reviews of the MSP. The Council is currently considering a planning application for the allocated site at Chapel Farm.

<ul style="list-style-type: none"> If Chapel Farm is brought forward earlier, it would indicate higher demand and potential exhaustion of other reserves. This raises further concerns that existing reserve figures or reported sales averages may significantly underestimate actual demand. 		
Sharp Sand and Gravel Allocated Site - Moat Farm		
<ul style="list-style-type: none"> Sharp sand and gravel, Para 2.4- 10-year average of sharp sand and gravel sales on the Draft Review Plan appears low. The 10-year average reported in LAA 2022 is 186,150t but the sales figures represented in Table 2 of the LAA says 228,544tpa. A minimum 7-year landbank to be maintained would be 1.6mt which would be inadequate by 2027 if the potential yield in the allocated sites is not realised or by 2038 if it is. Therefore, if not maintained, the minimum landbank would not be maintained at the end of the Plan period. The level of provision, based on the LAA (2022) rate would be 5.016mt, giving a larger shortfall of 2.962mt. Taking into account the potential yield rather than the reverse, the surplus reported in the Plan then becomes a shortfall of 0.462mt. 	Mineral Products Association	<ul style="list-style-type: none"> Para 2.4 of Policy CSM2 of the now adopted KMWLP 2024-39 details the permitted landbanks and the necessary requirements, as potential new reserves, from allocation of sites in a Mineral Sites Plan. The policy allows for the update of requirements based on the most recent LAA data. The LAA2025 (2024 data) demonstrates that over the KMWLP period there will be a 1.6mt surplus of sharp sands and gravel given current landbanks and the injection of 2.5mt from the MSP allocations. There will be no shortfall over the projected Plan period to 2039.
<ul style="list-style-type: none"> Active lobbying has taken place regarding Moat Farm due to concerns about additional disruption from the quarry extension. There is a strong need for mitigation measures to reduce impacts on the local community. Mitigation should include the provision of public open space for walkers and horse riders, and potentially cyclists. Former quarry areas could be made accessible for recreation while quarrying continues elsewhere. It is strongly recommended that such mitigation is made a formal condition of any further quarrying permission. Mitigation measures should be delivered within a specified and early timeframe. The local area is poorly served by higher-status PROW. An off-road bridleway network would help offset 	British Horse Society	<ul style="list-style-type: none"> The site is an allocated site in the Kent Mineral Sites Plan (MSP) 2020, having been found sound at the previous local plan examination. The review of this Plan does not seek to de-allocate the site. All public access via defined bridle ways and designated PROW will have to be maintained during any mineral activity at this allocated site. Further details will be assessed at detailed planning application stage.

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