Appendix F

Kent Mineral Sites Plan

Hermitage Quarry – Suitability for Allocation Assessment Report

June 2026

CONTENTS

1.0 Introduction

1.1 This report has been prepared to assess whether land south and west of Hermitage Quarry should be proposed for allocation in the Kent Mineral Sites Plan, having regard in particular to the allocation tests in Policy CSM2 (Supply of Land-won Minerals in Kent) of the Kent Minerals and Waste Local Plan 2024-39 (KMWLP), material associated with a consultation on a draft updated Kent Mineral Sites Plan in 2023, and the current technical evidence base. On this basis the report includes a recommendation on whether the site is considered suitable for allocation.

1.2 The wider corporate policy framework has been taken into account in preparing this report, in particular the Council's wider environmental and growth objectives - including those set out, for example, in the Kent Environment Strategy, the Kent and Medway Energy and Low Emissions Strategy, Kent Plan Bee, Kent Plan Tree, Kent and Medway Local Nature Recovery Strategy, and the Kent and Medway Economic Strategy.

2.0 Hermitage Quarry, site, proposal and current evidence base

2.1 The proposed allocation is named "Land to the South and West of Hermitage Quarry", and is nominated for "Extraction of Hard Rock of the Limestone Hythe Formation (Kentish Ragstone)". The site lies within Tonbridge and Malling Borough (northern part of the site) and Maidstone Borough (southern part), and within East Malling and Larkfield Parish and Ditton Parish (in Tonbridge and Malling Borough). The southern part of the site falls within Barming Parish in Maidstone Borough and is approximately three miles north west of Maidstone town centre and near to the residential areas of Barming and Allington (see Figure 1).

2.2 The site covers an area of 96 hectares from within which the promoter (Gallagher Aggregates Ltd (GAL)) suggests an area of up to 49 hectares could be worked subject to planning constraints, with an estimated resource of up to approximately 23 million tonnes of Ragstone Hard Rock, and an estimated output of approximately 0.9 million tonnes per annum.

2.3 The land is currently dominated by sweet chestnut coppice plantation (with an 'ancient woodland' designation) with some agricultural fields and the promoter suggests it would be restored to original levels with inert restoration materials (circa 500,000 tonnes per annum) and returned to mixed native woodland and meadow that would contribute to compensation for the loss of land designated as ancient woodland, and subject to biodiversity net gain requirements.

2.4 Hermitage Quarry is owned by the Gallagher Group, a local business that was founded in 1973. It has expanded to become a significant Kent employer with an annual turnover of over £235 million with Gallagher Aggregates Ltd contributing around £58 million in 2024/25. The quarry is the primary source of Kentish Ragstone which is used for the restoration of heritage sites and in the construction of modern buildings, roads and other infrastructure.

2.5 It is a local business that is well embedded in the local community. It operates the 'Gallagher Academy" at Hermitage Quarry, which includes an apprenticeship and Kent Skills Hub (a permanent facility opened in June 2026) and it is engaged in a wide range of community initiatives.

2.6 Operations at Hermitage Quarry include civil engineering, property development and aggregate production. Hermitage Quarry is the most significant part of its aggregates business. Along with the nearby Blaise Farm quarry (also owned by the Gallagher Group), Hermitage Quarry is the only source of Kentish Ragstone that is still actively quarried, but is of higher quality than the Blaise Farm reserves in respect of its heritage restoration applications, and to maintain the traditional architectural vernacular of areas where the stone has been historically used. KMWLP Policy CSM 9: Building Stone in Kent specifically references Hermitage Quarry for its ability to provide distinctive, high-quality stone suitable to maintain and restore historic buildings across South East England, including the Tower of London, buildings at Knole Estate, Rochester Cathedral and Leeds Castle. Hermitage Quarry houses a specialised masonry and heritage stone facility, which provides Kentish Ragstone for repairing and restoring a wide range of historical landmarks across London, the South East region, and more widely.

2.7 Kentish Ragstone also has wider non-heritage uses, including gabion walls for structural revetment use, RIP RAP used in large infrastructure projects and decorative and landscaping applications.

2.8 The site currently includes various processing plants, to deliver a wide range of aggregates from virgin and recycled sources, a ready-mix concrete plant and a concrete tunnel, which enables heavy plant machinery to be transported between the processing facilities in the original quarry and the newer working areas.

2.9 Hermitage Quarry recycles hardcore materials from twenty-one recycling centres across Kent and it includes an inert landfill site. Once the hard rock has been quarried, the land is restored, including by backfilling, representing a full cycle in land use.

2.10 According to GAL, around 70% of the hard rock that is quarried at Hermitage Quarry is used for housing and associated infrastructure, including roads, commercial and industrial premises and community facilities, such as local schools.

2.11 The entrance to the quarry is via Hermitage Lane (B2246), which itself connects to the A20 London Road and Junction 5 of the M20.

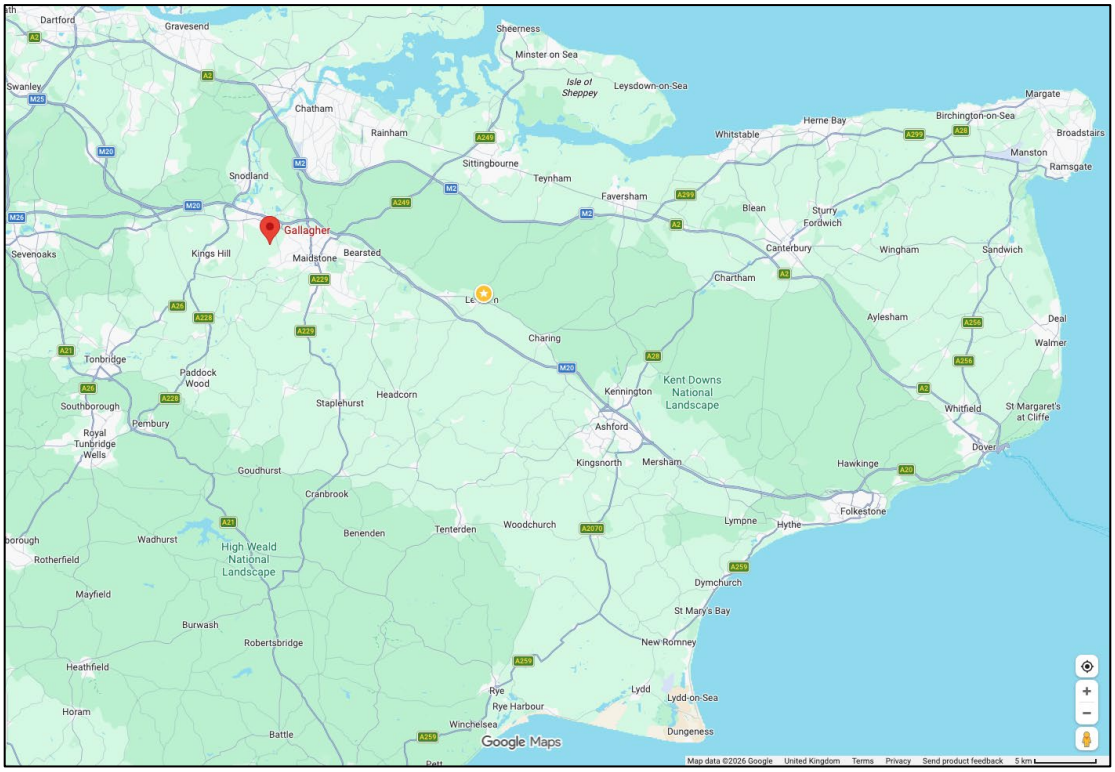

Figure 1: Location of Hermitage Quarry ('Gallagher')

2.12 In 2013, following a public inquiry, the Westerly Extension of the quarry was approved by the Secretary of State, stretching around 79 acres into Oaken Wood including an area of 'Plantation on Ancient Woodland Soils' (PAWS). Despite the loss of PAWS, permission was granted in recognition of the fact that the extension allowed an additional 16.2 million tonnes of ragstone to be quarried at the site, extending its lifespan to between 2034 and 2038, at the time safeguarding and creating jobs for a further 20-25 years.

2.13 Long term demand for aggregates is difficult to quantify, but the South East England Aggregate Working Party (SEEAWP) highlights significant infrastructure projects in the south east that *"could affect aggregate provision"*. These include Heathrow and Gatwick Airport expansions; Rampion 2 Windfarm; Lower Thames Crossing; Ebbsfleet Garden City; and the Oxford-Cambridge Arc.

2.14 Hermitage Quarry accounts for approximately 30% of Kent's total crushed rock sales, with much of the remainder being imported (56.6%) mainly from the South West and East Midlands regions of the UK, and Northern Ireland, Scotland and Norway.

2.15 At the end of 2024, there were 12.13 million tonnes of hard rock reserves at the Hermitage and Blaise Farm Quarries. Based on a six-year sales average of 1.34 million tonnes per year, this suggests around 9 years of reserves remaining (to 2033) which is below the policy requirement to maintain a 10 year landbank.

2.16 The further extension to the south and west would allow extraction of a further potential 23 million tonnes of ragstone, extending the lifespan of the quarry for up to 20-25 additional years. The nominated extension would result in the loss of

additional further PAWS, though the site promoter proposes to compensate this impact. Ultimately the proposal is that the PAWS soils are translocated and the site would be restored to native woodland of greater species diversity than the current Sweet Chestnut plantation.

Evidence Base

2.17 The current work on the Kent Mineral Sites Plan forms part of the wider updating of Kent's minerals and waste planning framework. The existing Kent Mineral Sites Plan was adopted by Kent County Council in 2020 and allocates sites for soft sand and sharp sand and gravel. At the time, there was no need to plan for landwon hard rock. In preparation of the Kent Minerals and Waste Local Plan 2024–2039, (which updated the Kent Minerals and Waste Local Plan 2013-2030), the County Council subsequently identified the need to consider whether the Mineral Sites Plan should also be updated to ensure that sufficient provision could be made for landwon hard rock over the extended plan period. Work on identifying an additional site for hard rock commenced in 2022 as part of that wider plan-making programme.

2.18 Identification of a site (or sites) commenced with a first 'call for sites' for hard rock in late 2022, following which a single site, land to the south and west of Hermitage Quarry, was nominated by GAL. The Council then carried out consultation in June and July 2023 on the nominated hard rock site, supported by an initial 'RAG' assessment and draft Sustainability Appraisal, and, in light of comments received, subsequently undertook a second call for sites from August to October 2023. Detailed technical assessment of the nominated site commenced, but progress on the Mineral Sites Plan paused while resources were focused on the examination of the Kent Minerals and Waste Local Plan 2024–2039, which was adopted on 13 March 2025. The current stage of work concludes consideration of the nominated Hermitage Quarry extension site against the relevant policy tests, the Regulation 18 consultation responses and the current technical evidence including Sustainability Appraisal, in order to inform a decision on whether the site should proceed as a proposed allocation in an updated Kent Mineral Sites Plan.

2.19 The technical reports and correspondence on which this report is based, are from three main sources, statutory consultees (for example Natural England (NE)), Kent County Planning and Technical Officers (and their technical and planning advisors), and information prepared and submitted in support of the allocation by the Promoter. A list of the main key technical documents which have been referenced in the preparation of this Report are included in Appendix 1.

Key issues emerging from the evidence

<u>Ancient Woodland</u>

2.20 The most important issue in determining whether to allocate the site, is the potential for the extension to cause harm to the area currently (and historically) planted as a Sweet Chestnut Coppice non-native plantation woodland. The formal designation of this land as a Plantation on Ancient Woodland Site (PAWS) means that *"wholly exceptional reasons"* and a *"suitable compensation strategy"* are required to justify

any allocation of a quarry. Establishing that a quarry development would first meet the relevant ancient woodland planning policy tests is the principal consideration to be addressed when assessing the suitability of the site in planning policy terms.

Kentish Ragstone Dimension Stone

2.21 The quarry provides the only UK source of Kentish Ragstone suitable as an essential raw material in the maintenance and repair of nationally significant historic buildings and structures and a as source of material for local vernacular building stone. The conservation of historic buildings should be attributed great weight in accordance with the NPPF (para 213), and is a very significant factor weighing in favour of allocating the extension site to enable a continuation of the supply of this essential material.

Other Considerations

2.22 The land-won hard rock aggregate landbank for Kent is currently approximately nine years. Kent is required to maintain a ten-year landbank for crushed rock for aggregates provision, and the extension to Hermitage Quarry is the only site which has come forward from the "call for sites" from where this continuing need could be met.

2.23 The quarry operators, Gallagher, are a significant local employer in Kent, and without the allocation, jobs currently associated directly and indirectly with the continued operation of the quarry would be lost. The operator estimates the approximate number of jobs at risk to be 140 provided directly by GAL, plus indirect employment opportunities – via circa 400 Kent based companies in GAL's supply chains[1].

2.24 The site has potential to result in environmental harms typically associated with quarry developments, particularly in respect of issues such as landscape, noise, the loss of agricultural land, a right of way and highways.

2.25 A *Natural Capital Report* prepared by the Promoter presents an estimated assessment of the Natural Capital Value of woodland creation, habitat restoration and management and socio-economic impacts for *Land South and West of Hermitage Quarry.* Covering carbon sequestration and storage, recreation and tourism, biodiversity net gain, agricultural biomass, tax impacts and socio-economic impacts the overall Net Natural Capital Gain is estimated in net present value by the Promoter as approximately £144 million. Whilst the natural capital benefits are noted, the monetary value ascribed to these has not at this stage been included within the factors considered to determine whether *"wholly exceptional circumstances"* exist as they have not been independently verified.

[1] BPP Consulting, Socio-economic Impacts Report, April 2026

3.0 Plan Allocation Policy for Sites in Kent

3.1 Policy CSM2 of the KMWLP is the salient policy which must be met in establishing whether a site should be allocated in a Sites Plan. This states, in relation to proposals for crushed rock sites, that:

> *"**Policy CSM 2 Supply of Land-won Minerals in Kent***
>
> *Mineral working will be granted planning permission at sites identified in the Minerals Sites Plan subject to meeting the requirements set out in the relevant site schedule in the Mineral Sites Plan and the development plan.*
>
> ***1. Aggregates***
>
> *Provision will be made for the supply of land-won aggregates as follows…:*
>
> *…• Crushed rock: A landbank of hard crushed rock at least equal to the 10-year landbank (as set out in the latest Local Aggregates Assessment) will be maintained throughout the Plan period.*
>
> *Additional sites required to maintain landbanks of land-won aggregates at the levels stated above will be identified if possible, in the Mineral Sites Plan. A rolling average of ten years' sales data and other relevant information will be used to assess landbank requirements on an on-going basis, and this will be kept under review through the annual production of a Local Aggregates Assessment…*
>
> *6. Selection of Sites for Allocation*
>
> *The criteria that will be taken into account for selecting and screening the suitability of sites for allocation will include:*
>
> - *the requirements for minerals set out above;*
> - *relevant policies set out in Chapter 7: Development Management Policies*
> - *relevant policies in district local plans and neighbourhood plans;*
> - *strategic environmental information, including landscape assessment and Habitat Regulations Assessment (HRA) as appropriate;*
> - *their deliverability; and*
> - *other relevant national planning policy and guidance."*

3.2 The policy makes clear that *"Sites identified in the Minerals Sites Plan are generally where viable mineral resources are known to exist, where landowners are supportive of mineral development taking place and where it is considered that planning applications are likely to be acceptable in principle in planning terms."*

3.3 The Policy (which relates to aggregates) does not directly address the need for the Kentish Ragstone, and the broad approach that should be taken in respect of minerals falling outside the scope of the Policy (and hence not being allocated a Site in the Plan), is set out in paragraph 5.4.2, which states *"…Planning applications for minerals development on non-allocated sites (other than with respect to silica sand, which is provided for under Policy CSM 2 where no allocations are proposed to be made) will be considered having regard to the relevant objectives and policies of the*

development plan as a whole, in particular the need to plan for a steady and adequate supply of mineral."

Policy CSM 2 as the decision framework

3.4 Hermitage Quarry can be assessed against the tests of Policy CSM2, based on the currently available evidence base. Where gaps exist in the evidence base, these are acknowledged in the assessment. Taking each test from part 6 in turn:

Is there a requirement for the mineral?

3.5 The proposed Site would produce two separate and distinct products, crushed rock for use in construction, and a very high value Kentish Ragstone (Dimension Stone), which is a unique source of material for the conservation, restoration and maintenance of historic buildings and structures. The requirement for these two products is addressed separately.

<u>Crushed Rock</u>

3.6 This material makes up the overwhelming majority of the current quarry output.

Hard rock shortfall over the plan period

3.7 As mineral planning authority, KCC has a statutory obligation to prepare planning policy concerned with the supply of minerals. Such policy must be consistent with national planning policy including the requirement to plan for an adequate and steady supply of aggregate minerals over a minimum 15-year period. KMWLP Policy CSM 2 identifies a shortfall of 17.38Mt to maintain provision for the requisite 10 year 'landbank' of crushed rock throughout the Plan period, however the latest LAA indicates that an additional 19.9Mt is required. Therefore, additional sites to maintain the requisite landbank of crushed rock should if possible be identified, with the *"presumption that provision would be made by means of the allocated sites coming forward and providing the mineral required at the appropriate time."* (para 5.4.2)

Whether the site is the only or most appropriate to meet that shortfall?

3.8 KCC has undertaken two "call for sites" consultations in 2022 and 2023 to encourage future mineral sites to be nominated from which to meet the identified need for sources of crushed rock in Kent. However, no other sites have been proposed from where this need could be met once the current reserves at Hermitage Quarry and Blaise Farm Quarry have been exhausted. This is expected to occur approximately around 2033. It is also of note, that two previous calls for sites undertaken when the previous Plan was prepared also failed to identify alternatives, and no other site has been promoted in the period since 2023 since the most recent "call for sites", despite awareness of the need.

3.9 The Promoter has submitted an alternative sites assessment as part of the technical work undertaken in respect of the justification for the proposed allocation, and work has been undertaken by the Council's technical advisors to confirm opportunities for alternative sources of material, neither of which have resulted in the identification of appropriate land-won sources within Kent.

Availability of alternatives

3.10 Recycled aggregate materials, similar to those currently produced at Hermitage Quarry could meet some of the need for some crushed rock. Though as a substitute recycled materials are limited in their application to bulk fill, granular bases, coated (bitumen) roadstone/hot rolled asphalt and highway surface dressings. Ragstone as a primary aggregate can also be used for buried and structural concrete applications that require load bearing and tensile strengths that recycled and secondary aggregate materials cannot provide. The use of recycled and secondary aggregate derived materials for river and sea defences may also be far more limited.

3.11 Without an extension to Hermitage Quarry, Kent (and much of the wider South-East and London) would be more heavily reliant on imports of crushed rock via sea, rail and road once the current reserves are exhausted. The main accessible sources of crushed rock which currently meet demand in the South East, are the South West, East Midlands, and sources outside England and Wales. However, substantial crushed rock reserves currently exist outside Kent (albeit a significant distance away) and there is potential capacity at aggregates railheads and wharves for their importation and onward transportation by HGV to their point of use.

3.12 The latest LAA records hard crushed rock wharf imports of 1.44Mt in 2024 and rail imports of 0.317Mt in 2024, while also recording substantial remaining import capacity, including 8.210Mtpa wharf capacity and 2.225Mtpa rail depot capacity.

3.13 The latest LAA suggests that, in theory, Kent has sufficient railhead and wharf capacity to meet all of Kent's need via these sources. However, no definitive figures currently exist which demonstrate this. Although the decision in respect of the allocation is based upon this assumption being true, in the event spare capacity diminishes over time due to losses of importation facilities, or is currently lower than believed, then the case for allocation would become stronger. Moreover, the LAA cautions that apparent headroom in capacity does not account for practical operational limitations, system complexity and the need to maintain a degree of capacity headroom to enable the importation system to be resilient against future supply shocks and be able to respond to increased needs irrespective of any further land-won allocations.

3.14 The importation of material from outside Kent to meet its identified need is not without associated social, environmental and economic downsides resulting from the extraction and transportation of this material.

3.15 Communities living close to the quarries from which the material is imported would in broad terms be expected to experience similar issues from the extraction of the material itself as those experienced by communities in Kent. In general terms, planning harms would still result, these would merely be displaced to the communities in the alternative locations from where the need for material for use in Kent was met instead.

3.16 Environmental harms resulting from quarrying are generally more nuanced than social harms, and tend to vary more widely depending on the nature of the activity

and the specific environmental constraints of the site. However, environmental harms always result from the transportation of material from a quarry to its point of use, primarily in respect of associated carbon emissions – much more so, where the material is transported the whole of the distance from the quarry to the point of use by HGV. The potential for carbon emissions is addressed in the Carbon Assessment for Potential Extension to Hermitage Quarry report (WSP, June 2026).

3.17 Where all the other planning considerations are equal, sourcing material as locally as possible to its final point of use will almost always be environmentally preferable to sourcing material from more remote locations. Sourcing material to be used in Kent, from within Kent, should always be preferred in principle (KMWLP policies CSM12, DM13), where acceptable locations from which to source material exist.

3.18 Sourcing material more remotely (in general terms) also usually results in economic harms when compared with sourcing local material. The greater cost of transportation feeds through into an increase in the price of the product, and jobs associated with the quarrying operations themselves are displaced to other parts of the Country, or abroad, with the resultant economic benefits lost to the local economy.

3.19 In the light of the above, the preferred option to meet need in Kent, would be to extract crushed rock from an extension to Hermitage Quarry (the only identified future source of this material in Kent) in a socially, environmentally and economically acceptable way.

Kentish Ragstone Dimension Stone

3.20 Hermitage Quarry produces a specialist Dimension Stone, which is a very important planning consideration attracting great weight (NPPF 224(f)). The Kentish Ragstone Dimension Stone is crucial for the sensitive repair and maintenance of historic buildings including the UNESCO World Heritage Sites – Tower of London, Palace of Westminster, Westminster Abbey and Canterbury Cathedral, and historic Listed buildings local to Kent including Rochester Cathedral, and Leeds Castle (Maidstone), with a proportion also used in the construction of new buildings. The current planning permission requires an annual minimum of 25,000t of Kentish Ragstone to be supplied, and this would remain the case. At any one time a minimum stockpile of 12,500t of Kentish Ragstone is proposed to be retained for use in emergency works such as sea defences. Monitoring data provided by the Promoter show ten-year average sales of Kentish Ragstone (as a building stone) are 1,740tpa over the past ten years (and there is no reason to expect this to significantly change), with a further approximately 17,000tpa (based on 2025 figures) used in non-heritage uses (overwhelmingly consisting of 6G used in gabion walls for structural/revetment works). However, this demonstrates that supply exceeds demand, and the materials are being retained to meet future supply for restoration projects in accordance with sustainability principles.

3.21 Policy CSM 9 addresses the way planning applications for building stone should be considered in principle. This policy states that "*planning permission will be granted for proposals that are needed to provide a supply of local building stone necessary*

for restoration work associated with the maintenance of historic buildings and structures and new build projects, subject to: 1. Development taking place in appropriate locations where the proposals do not have unacceptable adverse impacts on the local environment; and, 2. There being no other suitable, sustainable sources of the stone available."

3.22 The Inquiry Inspector for the extension currently being worked described the heritage value of the Kentish Ragstone Dimension Stone as follows:

"It has been used in a long list of very prestigious buildings such as the Tower of London, Canterbury Cathedral, Rochester Cathedral, the Guild Hall, the Greenwich Maritime Complex and the precincts of Westminster Abbey, as well as over a thousand listed buildings. It has been used in four of the UK's 12 World Heritage Sites and it is also significant in the character of at least 51 Conservation Areas in Kent." (para 16.9)

"From time to time, new dimension stone is required for the restoration, alteration or extension of these buildings. Whilst alternative materials such as Chilmark Stone have been tried in the past for restoration purposes, they do not match the original ragstone in substance, texture, quality or colour. Nor do they have the same weathering characteristics. Accordingly, English Heritage and those responsible for the upkeep of these historic buildings consider it essential to maintain a supply of Kentish Ragstone for dimension stone purposes." (para 16.10)

<u>Other benefits of the Allocation</u>

3.23 The continued operation of the site would enable retention of the Skills and Training Hub for training on Lower Thames Crossing construction and hard to reach groups and prisons. This is considered a valuable facility for social and economic reasons.

The continued operation of the site would allow the contribution it makes to waste management and recycling in Kent to continue, and of particular note is the sites function as the only facility capable of processing difficult to manage Air Pollution Control residues (APCr) from Energy Recovery Facilities. The continued operation of the site would allow these functions to continue in the future.

The continued operation of the site would allow for the continuation of the secondary aggregates manufacturing facilities, which provide material important to reduce the demand for primary minerals. Without the facility, the overall supply of construction aggregates will reduce, and alternative sources to meet this demand will need to be found.

3.24 The Secretary of State's decision letter following the Inquiry for the current extension stated:

"The Secretary of State agrees with the Inspector that, in the absence of permission for the Westerly Extension, the currently permitted reserves would be exhausted in late 2014 or early 2015, after which time the core of the workforce would no longer be required and there would be a phased downsizing of the remainder. He agrees with the Inspector that it is unlikely that many of these employees would be re-

deployed within the associated Gallagher businesses, and that these other businesses could also be affected by the closure of the quarry. He also agrees with the Inspector that not only would the loss of these jobs be a personal blow to the employees, but that these skilled workers currently make a beneficial contribution to the diversity of the workforce in Kent." (para 24)

"The Secretary of State also agrees with the Inspector that, in the event that permission for the proposed extension was refused and the existing quarry closed by early 2015, crushed rock would have to be imported into Kent by other suppliers, who would not necessarily be subject to the competition currently provided by the appellant, and that this could well increase prices, to the detriment of the local economy." (para 25)

Whether the site is the only or most appropriate to meet this need?

3.25 Hermitage Quarry is the only source of Kentish Ragstone available and suitable for heritage purposes. The KMWLP recognises (para 5.9.1) that "*Only two ragstone quarries have consented reserves at the time of the preparation of this Plan: Hermitage Quarry and Blaise Farm in mid Kent. Although building stone has been produced from both quarries, only Hermitage Quarry has the ability to produce high-quality cut stone from the full sequence of ragstone beds in the Hythe Formation, and it continues to provide building stone for building conservation uses*."

3.26 As well as confirming the lack of any suitable alternative sources at that time (2013), the Inspector's Decision on the Inquiry for the current operational quarry extension also stated that at that time:

"There have been two separate calls for minerals sites as part of the Kent Minerals and Waste Development Framework, but no other ragstone sites have been forthcoming" (para 16.17).

"The lack of any other viable alternative site for ragstone extraction is supported by the Alternative Sites Study carried out by the Applicant…This identified an initial 118 possible sites. 18 were studied in detail and none found to be viable alternative sites to Hermitage and Blaise Farm Quarries." (para 16.18)

"Building stone has been produced in the area for centuries but at present Hermitage Quarry is the only source of good quality Kentish Ragstone for dimension purposes. Policy CSM6 of the emerging Minerals Plan does support bespoke building stone quarries. However, the need to remove large quantities of overburden or other material in order to extract the ragstone is likely to make it uneconomical to operate a bespoke building/dimension stone quarry in this area in the current economic climate." (para 16.32).

"Although there is no separate apportionment for building/dimension stone, there is a substantial need to maintain a supply of specifically Kentish Ragstone for maintenance and restoration of many very notable buildings." (para 16.38)

"There is little prospect of a significant supply from the demolition of existing buildings and also little prospect of any bespoke building/dimension stone quarries being started in the area. Building/dimension stone would however be available from

some of the beds in a ragstone quarry worked primarily for aggregates. Not only are the ragstone beds at Blaise Farm mainly too thin to produce the larger pieces for quoins and copings for restoration work, but they have been tried for some dimension purposes and found unacceptable because of their relatively poor quality. In contrast, the Westerly Extension to Hermitage Quarry would provide good quality deep bed Kentish Ragstone for which there is a well-established need." (para 16.39).

3.27 Evidence gathered by the Promoter has reviewed geological information for the Kentish Ragstone resource and Study Area within which the assessment was undertaken, and this included the 18 sites which were subject to detailed assessment. The geological information built on the findings of an assessment undertaken for the previous planning application for the current quarry extension and evidence available at the time and concludes that there is no comparable deposit/potential to meet the building stone need (for heritage purposes) currently met from Hermitage Quarry.

3.28 KCC's technical advisors have also reviewed the potential for alternative sites to meet the need for Kentish Ragstone (Alternative Ragstone Supplies, WSP, 2026) in the context of the updated information provided by the promoter. The Report highlights some key issues which set the Kentish Ragstone at Hermitage apart from other hypothetical future sources, specifically:

"Hermitage Quarry is the primary source of thick beds of ragstone, suitable for both dimension stone, building stone and other building materials. At Hermitage Quarry, the Hythe Beds are ~30m thick." (para 3.2.5)

"…Although located just 5km west of the Hermitage quarry, and exposing the same geological formations the inquiry [on the previous extension] *noted that Blaise Farm Quarry has much thinner beds of ragstone, a higher proportion of hassock beds to ragstone beds. Moreover, according to evidence presented by stonemasons, stone from Blaise Farm Quarry did not satisfy requirements for quality building stone for restoration of historical buildings…"* (para 3.2.8)

"More recently, this position has been reiterated by the Stone Federation Great Britain, who in a letter to Kent County Council dated 11 July 2024, noted the importance of Kentish Ragstone as a building stone as important for many historic landmarks and highlighted that there is no suitable alternative limestone in existence that could be used in place of Kentish Ragstone for restoration and repair" and that Hermitage Quarry is *'the only source of Kentish Ragstone in the UK.'" (para 3.2.9)*

"It is further considered that up to date evidence provided by Gallagher robustly demonstrates that Hermitage Quarry is likely the only location in Kent that could currently provide a secure and sustainable source of ragstone for building stone (and aggregate) purposes." (para 5.1.3)

3.29 They also advised that further evidence was required in respect of (a) whether building stone quality material is being used for aggregate purposes; and (b) what the anticipated future demand for building stone is, to ensure that the correct 'importance' is attached to Hermitage Quarry as a supplier of restoration stone and

this information was subsequently obtained from GAL after the report was finalised and is referred to in paragraph 3.20 above.

Is the site consistent with relevant development management criteria?

3.30 An Initial (RAG) Assessment[2] of the proposed allocation was undertaken in May 2023. Since then, more detailed assessment has been undertaken through further technical work which forms the evidence base for the Plan. The documents and consultation responses referred to are referenced in Appendix 1.

Biodiversity - PAWS - irreplaceable habitat

3.31 A significant part of the site is designated as PAWS. Ancient Woodland is defined by Natural England as an area of land that has been wooded continuously since at least 1600 AD. It includes plantations on ancient woodland sites (PAWS), replanted with conifer or broadleaved trees, that retain ancient woodland features, such as undisturbed soil, ground flora and fungi. PAWS, although a habitat with significant human intervention in the form of plantation woodland, have maintained a continuous link between the ancient woodland present in the past by maintaining tree cover without a period of conversion to another land use type (such as arable, pasture etc).

3.32 A large proportion of the Site is within Oaken Wood, Barming Local Wildlife Site which has been designated for the large block of ancient broadleaved woodland (the majority of which has been converted to chestnut coppice and is actively managed) and the more recent woodland at East Malling Heath on the western side of the LWS. Some ancient woodland indicator plant species have been recorded within the LWS, and the citation states the LWS is important for birds and invertebrates and also includes a pond on the southern boundary.

3.33 The Woodland Trust has an Ancient Tree Inventory, which notes the presence of a "Notable Tree" (oak *Quercus* sp.) within the Site at grid reference TQ71005519 that has a diameter at breast height of 4.5m. However, the record also notes that the tree was located on private land and not visible from public access. As the woodland within the Site is publicly accessible, it may be that the accuracy of the grid reference provided for the notable tree is relatively low, and therefore the notable tree is not actually located within the proposed Site Allocation. There are also two large trees potentially affected at the entrance to Luckhurst Farm. Surveys undertaken by Ecology Solutions in 2023 indicate that there are no ancient/veteran trees within the proposed Site Allocation, and this would need to be confirmed.

3.34 Some trees within the proposed allocation wrapping around the southern and western boundary of the site currently being quarried are protected woodland covered by a woodland TPO. The TPO itself does not present an insuperable obstacle to development because reg.14(a)(vii) of the Town and Country Planning (Tree

2 Initial (RAG) Assessment of the Suitability of Nominated Land to the South and West of Hermitage Quarry for Hard Rock, KCC, May 2023

Preservation) Regulations 2012 permits the cutting down, topping, lopping or uprooting of a tree protected by a TPO *"insofar as such work is necessary to implement a planning permission"*. However, it would be necessary to consider the following at the planning application stage:

a. The reasons why these trees are protected;
b. The extent to which those trees will be harmed by the development of the Site; and
c. The extent to which the objectives of the TPO would therefore be compromised by any such development.

3.35 In summary, the salient constraints to quarrying of the Site are the presence of PAWS, and a secondary constraint is the presence of Oaken Wood LWS. In particular the presence of PAWS, make development of the site incompatible with planning policy unless there are wholly exceptional reasons as to why the development should go ahead and a suitable compensation strategy exists. These issues are address later in this report. Further advice has been sought from the Council's technical advisors and internal ecology specialists, including the Hermitage Quarry – Environmental Support Ecology Report (WSP, 2026).

Health, amenity, air quality and recreation

3.36 It is usual for quarrying development to have potential for impacts on health, amenity, air quality and recreation unless the impacts are not appropriately mitigated. With regard to the proposed allocation, this issue is considered below.

3.37 WSP conclude in their Health Impact Assessment (Technical Note) (June 2026) that *"…with the continued implementation of operational controls and the introduction of new mitigations, health impacts associated with the proposed allocation of additional land at Hermitage Quarry for the extraction of ragstone is unlikely to pose any significant health risks to the local population. Notwithstanding this, it is expected that any planning application for future development at the Nominated Site would be accompanied by quantitative assessments to demonstrate how impacts on human health, particularly from dust, emissions, noise and vibration, will be managed to acceptable levels. Such quantitative assessments would inform site-specific management plans, and feed into a comprehensive HIA to accompany the planning application."*

3.38 WSP conclude in their Air Quality Assessment (Technical Note) (June 2026) that *"Whilst the expansion of Hermitage Quarry could present some air quality challenges, notably through potential loss of amenity associated with the reduction in distance between the quarry and receptors increasing the effectiveness of the dust deposition pathway, it is unlikely to add to loss of amenity which cannot be addressed through further mitigation measures. An assessment of the extent of loss of amenity will likely form the basis for any air quality assessment going forward. It is likely that the primary outcome of the assessment would be an overhaul to the existing DMP to*

make use of best available techniques and dust management advice which has been updated in the time since the original DMP was published."[3]

"With the information available at the time of writing, potential dust release through quarry activities is unlikely to give rise to any significant impacts to human or ecological health. Further ecological surveying and air quality monitoring will be required to thoroughly assess any potential risk of impacts before human and ecological health can be screened from further consideration."

"Similarly, detailed design information would be required to inform the screening for an assessment of potential odour impacts."

"Overall, this study has not identified any major constraints related to air quality that would likely result in an unacceptable impact at a sensitive location and present a 'showstopper' for future development of the Nominated Site. Following further detailed assessment and the implementation of necessary mitigation it is likely that the Nominated Site will be able to operate in accordance with Local Policy DM11 and the relevant sections of the NPPF."

3.39 In relation to potential noise impacts, WSP state in their Technical Note (June 2026) that *"…it is noted that Hermitage Quarry is currently controlled by a robust set of planning conditions covering all amenity matters – including air quality, noise and vibration – and it is understood that Gallagher has been operating well within the environmental limits currently imposed upon them. In this regard, should the Nominated Site be taken forward for development, it is acknowledged that robust noise and vibration assessments would be required, demonstrating that Gallagher could continue to operate within acceptable national standards and parameters in respect of all amenity matters."*

3.40 With appropriate mitigation, an EIA accompanying a planning application would be likely to demonstrate policy compliance.

3.41 Following review of the 2023 initial RAG assessment, and technical information submitted since, it is considered that, insofar as impacts on amenity are concerned, it can be concluded that there are no insuperable obstacles to the allocation of the site in the Sites Plan.

<u>Landscape and visual effects</u>

3.42 The RAG Assessment concluded that the Site *"is considered to have a minor adverse visual impact on the landscape."*

The subsequent Landscape and Visual Technical Note prepared by WSP (June 2026) concludes that *"The scale of the Proposed Development is such that when considered cumulatively, in the context of the existing quarry workings to the east, the quarry would cover a total area of some 150ha, with an overall width in excess of 2km from east to west."* and that the proposals *"demonstrate a committed approach to phased working, advance planting and long-term restoration in order to mitigate adverse impacts to the landscape from the proposed mineral working. From a visual*

[3] DMP = Dust Management Plan

perspective, adverse impacts would largely be confined to receptors in close proximity to the site boundary. There is extensive woodland cover within the wider study area which would be considered to provide adequate visual screening from the proposed mineral working area. Visual impacts on nearby residential receptors and users of public rights of way could also potentially be reduced through retained woodland buffers, advance planting, bunding and phased working, which would all be subject to detailed design and delivery. The site lies outside the Kent Downs National Landscape, and due to distance, landform and woodland cover, no significant effects on the setting of the designation are anticipated."

3.43 The Site is currently crossed by powerlines and the Promoter is in discussions regarding the potential for diversion or underground cabling. However, due to the early stage of the negotiations this should be given no weight in the decision, and continued existence of overhead powerlines on site or off should be assumed.

3.44 With appropriate mitigation, an EIA accompanying a planning application would be likely to demonstrate policy compliance.

3.45 Following review of the RAG, and technical information submitted since, it is considered that, insofar as impacts on visual amenity and landscape concerned, it can be concluded that there are no insuperable obstacles to the allocation of the site in the Sites Plan.

Access, transport and highway implications

3.46 Hermitage Quarry has good access to the Strategic Highway Network, and schemes are coming forward at Coldharbour Roundabout and in terms of the Whitepost Field link road which will further improve access, but the route is very sensitive at peak times. The local area has also seen a good deal of housing development over the past few years and more will likely come forward in the future.

3.47 Any planning application would need to be accompanied by a Transport Assessment undertaken in line with prevailing government guidance, which encompasses M20 junction 5. Overall, there are moderate issues with access to the Primary Route Network and Secondary Route Network. The identified impacts could be mitigated through planning obligations which could include a cap on HGV movements during peak traffic periods.

3.48 Since production of the RAG Assessment, highways advice has been updated to state *"…that the area has been subject to development and construction pressures and further development may come forward subject to planning permission/ progress with the T&M Local Plan/ further mitigations being identified and implemented by the sites generating the trips. This would be useful bearing in mind the significant political sensitivities in the area. The key highways mitigation here is to continue with a robust cap on HGV movements, particularly for the peaks."*

3.49 With appropriate mitigation, an EIA accompanying a planning application would be likely to demonstrate policy compliance.

3.50 Following review of the RAG, and technical information submitted since, it is considered that, insofar as access, transport and highway implications are concerned,

it can be concluded that there are no insuperable obstacles to the allocation of the site in the Sites Plan.

Hydrology and hydrogeology

3.51 The Environment Agency were consulted on the Draft Mineral Sites Plan. The site is located within Zone 3 (Zone III) of a SPZ, total catchment area. The site is located within a principal aquifer. Part of the site is located within a high groundwater vulnerability area. The site is located within Flood Zone 1, low probability of flooding.

3.52 The site could have a minor adverse impact on groundwater SPZs or water resources in the absence of low-level mitigation (e.g. working above the water table).

3.53 With appropriate mitigation, an EIA accompanying a planning application would be likely to demonstrate policy compliance.

3.54 Following review of the RAG, and technical information submitted since, it is considered that, insofar as hydrology and hydrogeology matters are concerned, it can be concluded that there are no insuperable obstacles to the allocation of the site in the Sites Plan.

Services (Electricity Pylons)

3.55 As stated previously in respect of landscape, the site is crossed by overhead power lines supported by a pylon which could require major mitigation through rerouting if the resource within the identified area is to be fully worked out.

3.56 Initial correspondence between the Promoter and the network provider has intimated that it is possible to divert these lines subject to a detailed feasibility/viability assessment. To assess viability the cost will need to be weighed against the benefit of removing the powerlines.

3.57 Although enquiries have been made, the Promoter has not received a definitive answer as to the stand-off required should the powerlines remain *in situ*.

3.58 If the pylons need to remain in place, yields from the Site would be lower than estimated due to the need to maintain unworked stand-offs, however a reduced yield would not impact on the merits of allocating the Site in principle.

3.59 With appropriate mitigation, an EIA accompanying a planning application would be likely to demonstrate policy compliance.

3.60 Insofar as the existence of overhead power lines is concerned, it can be concluded that there are no insuperable obstacles to the allocation of the site in the Sites Plan.

Geology (Geological SSSI – Oaken Wood)

3.61 Oaken Wood geological SSSI is located to the southwest of the site boundary. NE recommend appropriate stand-offs to the Oaken Wood geological SSSI are maintained to ensure no impacts. These are proposed with the original proposed boundary for the allocation having been revised and updated to include a greater stand-off. The stand-offs would be finalised at the application stage.

3.62 With appropriate mitigation, an EIA accompanying a planning application would be likely to demonstrate policy compliance.

3.63 There are no insuperable obstacles to the allocation of the site in the Sites Plan.

Historic Environment

3.64 The proposed allocation is located in an area which has not been subject to formal archaeological investigations. As such the Historic Environment Record (HER) does not necessarily reflect a true picture of the archaeological resource surviving on this site. From current information it can be suggested that this is an area of potential for prehistoric remains, including early prehistoric remains, in view of the presence of Medway 5th Terrace Gravels and Hythe Beds fissures which have potential for deposits of geoarchaeological interest and Palaeolithic remains. This area could also have been utilised in the later prehistoric period by farms, small holdings or small communities. The HER does record discovery of Neolithic flints close to Manor Farm and within the proposed extension site.

3.65 Overall, there are no designated heritage assets within the proposed extension area. There are designated heritage assets around the site but nothing immediately adjacent. In terms of significant remains, there is potential for significant geo-archaeological and Palaeolithic remains.

3.66 Although there are no designated heritage assets within the application site there is potential for significant archaeology and there is also a possible 19th century shooting box, which might merit preservation *in situ*. Specialist geo-archaeological and Palaeolithic assessments are essential as part of an assessment of the historic environment through an EIA process that would accompany a planning application.

3.67 With appropriate mitigation, an EIA accompanying a planning application would be likely to demonstrate policy compliance.

3.68 Insofar as historic environment considerations are concerned, it can be concluded that there are no insuperable obstacles to the allocation of the site in the Sites Plan.

Soil Quality (excluding areas designated PAWS)

3.69 Parts of the site contain best and most versatile land which would be moderately impacted by the development. However, opportunities for mitigation and restoration exist.

3.70 NPPF para 187b) recognises that the economic and other benefits associated with the best and most versatile agricultural land should be recognised. Paragraph 188 states that *"Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework",* and associated footnote 65 states that *"Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality."* Natural England state in their consultation response that *"it is particularly important that restoration and aftercare preserve the long-term potential of the land as a national, high quality resource. Where alternative afteruses*

(such as forestry and some forms of amenity, including nature conservation) are proposed on the best and most versatile agricultural land, the methods used in restoration and aftercare should enable the land to retain its longer-term capability, thus remaining a high quality resource for the future."

3.71 With appropriate mitigation, an EIA accompanying a planning application would be likely to demonstrate policy compliance, or at least accord with the development plan when read as a whole.

3.72 Insofar as soil quality is concerned, it can be concluded that there are no insuperable obstacles to the allocation of the site in the Sites Plan.

Public Rights of Way

3.73 Public Bridleway MR108 runs through the site, which provides both a strategic link across the wider area, and is also an important leisure route for walkers, cyclists and equestrians. There are also a number of permissive paths on the site. There is significant equestrian use in the area and the nature of Bridleway use (cyclist and equestrian) is of a more "unpredictable" nature and therefore any proposals regarding the route must be particularly well managed. This includes any construction period as well as operational, as there would be likely be a significant impact on the PROW network in the area during both construction and operation. The acceptable diversion of the bridleway will be necessary and will need to be agreed with the PROW and Access Service as the Highway Authority for Public Rights of Way.

3.74 The proposed allocation may result in some adverse impacts on existing open space and leisure interests. However, the significance of such potential adverse effects can (and should) be mitigated through the continued application of rigorous on-site operational controls (to minimise the site's impacts on the locality's wider amenity). Furthermore, other mitigations, such as the provision of permissive footpaths across Gallagher owned land and/ or the formal temporary/ permanent diversion of an affected Bridleway, are likely to ensure that the local population's enjoyment of open space and leisure are not significantly adversely affected.

3.75 With appropriate mitigation, an EIA accompanying a planning application would be likely to demonstrate policy compliance.

3.76 Insofar as public rights of way are concerned, it can be concluded that there are no insuperable obstacles to the allocation of the site in the Sites Plan.

Restoration, aftercare and after-use

3.77 The site is proposed to be progressively restored to original levels using on-site (hassock) and imported inert materials from consented waste management activities on the existing quarry site. Woodland restoration would deliver new species-rich native woodland with the translocated ancient soils retaining seeds and bulbs to encourage redevelopment of woodland ground flora. Similar translocation of soils took place for the current quarry extension, with woodland ground flora starting to be seen in the new native woodland required by the Secretary of State as

compensatory habitat. Restored woodland would be managed to establish a varied age profile, providing a variety of niches for wildlife in the area.

3.78 A compensation strategy would seek to protect any ancient value in the soils (see section 5) and aim to deliver a significantly higher value native broadleaved woodland to replace the existing non-native monoculture. Compensation areas would be established ahead of time, such that species would not be left without habitat. The development is expected to deliver a significant net gain in area of woodland habitat.

3.79 With appropriate design and mitigation, an EIA accompanying a planning application would be likely to demonstrate policy compliance.

3.80 Following review of the RAG, and technical information submitted since, it is considered that, insofar as restoration, aftercare and after-use matters are concerned it can be concluded that there are no insuperable obstacles to the allocation of the site in the Sites Plan.

Climate Change and Carbon Impacts

3.81 Climate Change and Carbon impacts were assessed in the Carbon Assessment for Potential Extension to Hermitage Quarry report (WSP, June 2026).

3.82 The transport assessment found that there is a significant carbon impact from importing crushed hard rock into Kent. Transport emissions were highest for Scenario 2 (Norway) (636,037 tonnes of carbon dioxide equivalent (tCO_2e) over 15 years) and lowest for Scenario 1 (Somerset) (198,804 tCO_2e over 15 years). The results showed that whilst the mode of transport has a significant impact on the emissions, since the transport distances were drastically smaller in rail freight transport, it became a key factor in the determination of transport emissions.

3.83 The PAWS assessment shows that the proposed extension of the Hermitage quarry with the proposed restoration woodland would result in an overall positive impact on carbon sequestration, with a change in sequestration of approximately -2,615 tCO_2e between the 'Do Nothing' and 'Do Something' scenarios. This positive impact is due to the change in woodland from a managed plantation with a rotation period to a restored woodland which is assumed to be left undisturbed.

3.84 The assessment indicates that reusing hassock as a secondary aggregate in place of imported primary aggregate could offer a net carbon benefit, primarily by reducing transport-related emissions. If approximately 200,000 tonnes of hassock currently disposed of each year were instead used locally within Kent, this could avoid an estimated 3,000-9,000 tonnes of CO_2e annually, depending on the source of primary aggregate displaced. Further assessment was recommended to quantify the embodied carbon impacts of hassock processing and to identify appropriate end uses where its substitution potential can be maximised.

3.85 With appropriate mitigation, an EIA accompanying a planning application would be likely to demonstrate policy compliance.

3.86 Insofar as climate change and carbon impact matters are concerned, it can be concluded that there are no insuperable obstacles to the allocation of the site in the Sites Plan.

Cumulative effects

3.87 The cumulative impacts of activity at the site with existing development may have some impact on the environment and community that will require low level mitigation.

3.88 It should be noted that new housing is being built in proximity to the existing quarry which demonstrates the cumulative impacts can be managed in principle using effective mitigation, and, while this matter does not represent an insuperable obstacle to allocation, this will need further assessment at the planning application stage.

3.89 With appropriate mitigation, an EIA accompanying a planning application would be likely to demonstrate policy compliance.

3.90 There are no insuperable obstacles to the allocation of the site in the Sites Plan.

Conclusion

3.91 Except for the loss of designated PAWS (including the potential for the presence of a very limited number of ancient/veteran trees to be confirmed or otherwise by further survey), all the issues addressed above, are considered to be possible to manage acceptably in principle, and could be addressed through an EIA process at the planning application stage.

3.92 The loss of PAWS and the planning considerations relating to this are considered, with reference to national and development plan policy, in section 5.

4.0 Is the proposed allocation consistent with relevant district local plan / neighbourhood plan policies?

4.1 Assessments have been undertaken of the consistency of the proposed allocation with the relevant adopted and emerging local planning policy frameworks for Maidstone Borough Council and Tonbridge and Malling Borough Council. Those assessments have been taken into account in considering whether the allocation would satisfy the requirements of Policy CSM2. They identify a number of policy tensions and matters requiring careful control, particularly in relation to ancient woodland, biodiversity, landscape, public rights of way, amenity and transport. However, they do not identify any conflict which, in itself, would prevent the allocation from being taken forward, provided that the site specific development criteria in the Mineral Sites Plan and the relevant development management policies are applied.

4.2 Overall, the proposed allocation is considered to be broadly consistent with local planning policy. That conclusion is necessarily subject to the specific policy tests relating to irreplaceable habitat being satisfied as discussed in section 5.0, including the need to demonstrate wholly exceptional reasons and a suitable compensation strategy, and to the more detailed assessment of environmental effects at planning application stage. In particular, the allocation would not remove the need for any future planning application to be supported by a full Environmental Impact Assessment and to demonstrate compliance with the development plan as a whole.

<u>Kentish Ragstone</u>

4.3 There is a significant amount of local planning policy relevant to the requirement for, and use of, building stone for heritage and conservation purposes.

4.4 The adopted Maidstone Local Plan (MLP) describes the way in which the underlying geology has provided locally distinctive materials including the widespread use of ragstone in the local vernacular and historic environment (Policy LPRSP14 (B): Historic Environment para 7.164 and 'Landscapes of Local Value', paras 6 and 7).

4.5 Policy LPRSP15 – Principles of Good Design sets out criteria to be met to create high quality design including: "2. *Respond positively to, and where possible enhance, the local, natural, or historic character of the area.", "*3…*making use of vernacular materials where appropriate. For housing schemes vernacular materials should be used on a high proportion of buildings, particularly in key/prominent locations."*

4.6 The MLP includes a policy requirement for the retention of Ragstone walls and several site allocations are required to incorporate the use of vernacular materials as a key component in achieving a high standard of design and sustainability

4.7 MLP para 9.112 states that the Council "…*strives to improve design build quality and has done work to support this through the production and use of documents such as Maidstone Building for Life 12 - 2018) and the Kent Design Guide.*

4.8 In advising how a development could be designed to achieve a local or distinctive identity 'Building for Life' recommends "*The use of Kent ragstone for buildings and walls is a key characteristic of the area and there is great scope for using vernacular*

details such as this in modern ways to reinforce local character. It also recommends that *"Ignoring local traditions or character without robust justification."* and *"Using materials that do not support the character and identity of the area."* should be avoided.

4.9 The 'value of good design' section of the *Kent Design Guide* refers specifically to Ragstone as a Kent vernacular building material stating that "*…new buildings should use materials which blend in with this rich tapestry of materials and colours."*

The adopted Tonbridge and Malling Borough Council (TMBC) 'Core Strategy' also aims "*To ensure that new development and other actions result in a high-quality environment…by… maintaining or enhancing local distinctiveness."*

4.10 The TMBC 'Managing Development and The Environment Development Plan Document' makes numerous references to the Kent Design Supplementary Planning Document and discusses how local distinctiveness may be shaped by "*..the quality of the built environment in terms of the design of key buildings both modern and historic, the use of local building styles and materials…"*

4.11 The emerging policy Draft TMBC Local Plan 2024 – 2042, November 2025 says in para 4.4 that "*The design of new and refurbished buildings will respect our diverse local character and heritage and will have become examples of high-quality design for West Kent."*

4.12 Objective 2 is to "*Protect and enhance the built and natural environment through high-quality design that respects valued landscapes and heritage,…"*

4.13 Chapter 9 – Design Quality seeks to "E*nsure that new buildings and spaces complement the rich character of the borough and create inclusive, attractive and healthy places which reinforce local distinctiveness."*

4.14 Emerging Policy D1: Achieving High Quality Design supports developments which are "*Locally distinctive, respond cohesively and create a positive sense of place by demonstrating a thorough understanding of the context and character of an area including…townscape…and materials…"* and that are *"Visually attractive and demonstrate a well-considered design response….and use of local, traditional and high quality materials.*

<u>Any policy conflicts e.g. landscape, biodiversity, access, amenity, rural development, settlement pattern</u>

4.15 Whilst there are issues that will require assessment and mitigation through EIA at the planning application stage, no fundamental conflicts arise, as set out in section 3.

<u>Are any conflicts material to the allocation decision</u>

4.16 There is a very obvious tension between the designation of the site as PAWS, and the need for a continuing supply of Kentish Ragstone for heritage purposes. This is a binary issue, with either one or other priority losing out. Both the preservation of our heritage and the protection of PAWS attract great weight as planning considerations.

Strategic Environmental Assessment

4.17 A Sustainability Appraisal, incorporating the requirements of Strategic Environmental Assessment, has been prepared to support the updated Mineral Sites Plan. The appraisal considers the proposed allocation of land to the south and west of Hermitage Quarry, alongside the existing allocated sites proposed to be retained, and also assesses the reasonable alternative of not allocating the site and relying instead on imports of hard rock from outside Kent. The appraisal identifies positive effects from the proposed allocation, including continued local supply of hard rock, support for local employment and the continued availability of Kentish Ragstone for building conservation and heritage restoration. It also notes that reliance on imports would be likely to increase transport distances, emissions and costs, and would not provide a continuing local source of Kentish Ragstone.

4.18 The Sustainability Appraisal also identifies potential adverse effects, particularly in relation to the loss of land designated as Plantation on Ancient Woodland Site, impacts on Oaken Wood Local Wildlife Site, local landscape character, Public Right of Way MR108 and potential amenity, air quality, water, soil and heritage effects. The SA recommendations can be addressed through site specific requirements for phased working, progressive restoration and aftercare, ancient woodland soil translocation, native woodland and meadow restoration, biodiversity net gain, public rights of way diversion and reinstatement, landscape mitigation and detailed assessment at planning application stage. Where effects cannot be fully mitigated, most notably in relation to PAWS, they have been considered separately through the assessment of wholly exceptional reasons, the suitability of the compensation strategy and the overall planning balance.

5.0 Is the Site deliverable?

Land ownership/control

5.1 The whole of the proposed allocation, and a significant area of surrounding land is within the control of the Promoter. Further information has been submitted which establishes that sufficient suitable land exists to deliver a suitable compensation strategy for the loss of PAWS. This would be delivered from within the wider landholding and, if necessary, in other locations.

Practicality of working the site

5.2 The pylons currently crossing the land are a constraint upon future quarrying operations which is addressed earlier in the report. Whilst representing a potential constraint on the total yield of material recovered from the site , the existence of the pylons does not give rise to a situation where the future quarry operations would be prevented altogether.

Deliverability of restoration and other mitigation

5.3 The deliverability of an appropriate site restoration has been considered, as is addressed elsewhere in this report. Overall, it is considered that the restoration scheme is appropriate, and sufficient land exists within the wider landholding, or can be obtained, to deliver a suitable compensation strategy to meet the test of planning policy for land designated as PAWS.

Whether the site is sufficiently deliverable to justify being relied upon as an allocation in the Sites Plan

5.4 Planning permission would be required before any proposal to extract the minerals from the land could proceed. A future planning application for extraction of the minerals, will require a full EIA, through which process a detailed assessment of environmental impacts and measures for their mitigation will be undertaken. The decision on whether a quarry is appropriate will be taken at that time, based on the technical and other information available to the decision maker (currently KCC Planning Committee). However, at this time, overall, it is considered that the site is likely to be sufficiently deliverable to warrant its allocation in the Plan.

6.0 Overall Planning Balance

Introduction

6.1 Salient matters for consideration in the planning balance are set out below:

- The impact on PAWS designated land.
- Other environmental harms which might result from the development.
- The future need for Kentish Ragstone for heritage restoration purposes.
- The future need for crushed rock for aggregates purposes.
- The likely benefits of the site in respect of direct jobs and benefits to the wider economy.
- The wider benefits of the continuation of the waste management activities.

6.2 Before addressing a planning balance, it should be noted that because the majority of the site is designated as PAWS, specific planning tests must first be met before wider considerations are taken into account.

6.3 NE advice in respect of the PAWS designation provided in the context of current planning policy is:

"Given the significant direct and indirect impacts to the natural environment that the proposed nominated site at Hermitage Quarry is likely to have, we recommend that the Council should undertake a comprehensive and independent consideration of whether there are alternative sites or sources of material which will avoid or result in lesser environmental effects. This assessment should include alternative sites, including those outside of the County boundary and alternative sources such as recycled material. This assessment should include landscape, nature and geological conservation and soil considerations in addition to the socio-economic impacts."

6.4 In light of this advice an appropriate review was undertaken, and forms part of the evidence base upon which this report, is based. Key documents are included in the list in Appendix 1.

Impact on Ancient Woodland

6.5 In order to be able to weigh the site in the planning balance for allocation or otherwise at all, it is first necessary to address the PAWS designation to which most of the proposed allocation is subject. This test has been strengthened in the NPPF since the current extension was approved in 2013. The current test is set out in para 193c of the NPPF, and states:

"When determining planning applications, local planning authorities shall apply the following principles:…..development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons[70] and a suitable compensation strategy exists."

Footnote 70 gives examples of *"wholly exceptional reasons"*, going some way to define wholly exceptional reasons as follows:

"For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills) where the public benefit would clearly outweigh the loss or deterioration of habitat."

6.6 KMWLP Policy DM 2 Environmental and Landscape Sites of International, National and Local Importance, states:

"Proposals for minerals and/or waste development will be required to ensure that they are not likely to cause significant harm to the integrity, character, appearance and function, biodiversity and geodiversity interests of sites of international, national and local importance, such that these proposals accord with the avoid, mitigate, compensate hierarchy…

…Minerals and/or waste proposals located within or considered likely to cause loss or deterioration of irreplaceable habitat such as Ancient Woodland and ancient or veteran trees will not be granted planning permission or identified in updates to the Minerals Sites Plan and any Waste Sites Plan unless the need for, and the benefits of the development in that location clearly outweigh any loss, justified by wholly exceptional reasons, and a suitable compensation strategy is in place."

6.7 Both tests are essentially the same in respect of how the PAWS designation should be treated when development is proposed (including in respect of a Plan allocation).

6.8 The test has a number of aspects which should be considered as follows: Firstly, whether the development would result in the loss or deterioration of the ancient woodland or veteran trees and then secondly, are there wholly exceptional reasons for the development and is a suitable compensation strategy in place? These are considered below for the mineral working site proposed for allocation on land south and west of Hermitage Quarry.

6.9 Government Guidance on Ancient woodland, ancient trees and veteran trees: advice for making planning decisions (Standing Advice produced by NE and the Forestry Commission) also contains advice on the correct approach and is a material consideration for Local Planning Authorities. This states that when making planning decisions:

"You should refuse planning permission if development will result in the loss or deterioration of ancient woodland, ancient trees and veteran trees unless both of the following applies:

- *there are wholly exceptional reasons*
- *there's a suitable compensation strategy in place (this must not be a part of considerations of wholly exceptional reasons)*

Ancient woodland, ancient trees and veteran trees are irreplaceable. Therefore, you should not consider proposed compensation measures as part of your assessment of the merits of the development proposal…

…You should decide on the weight given to ancient woodland and ancient and veteran trees in planning decisions on a case-by-case basis. You should do this by taking account of the NPPF and relevant development plan policies.

If you decide to grant planning permission that results in unavoidable loss or deterioration where wholly exceptional reasons are demonstrated, you should use planning conditions or obligations to make sure the developer:

- *avoids damage*
- *mitigates against damage*
- *compensates for loss or damage (use as a last resort)*

Where a proposal involves the loss or deterioration of ancient woodland or ancient or veteran trees you should not take account of the existing condition of the ancient woodland or ancient or veteran tree when you assess the merits of the development proposal. Its existing condition is not a reason to give permission for development. A woodland or tree in poor condition can be improved with good management.

Proposals can partially compensate for loss or damage of ancient woodland with measures to:

- *improve and restore plantations on ancient woodland sites*
- *improve the management of nearby ancient woodland sites and connecting them better to semi-natural habitat*
- *improve the condition of important features of ancient woodland*
- *improve access for management purposes*

Proposals can partially compensate for loss or damage to wood pasture by restoring semi-natural open habitat, managed by grazing, with open grown trees."

In light of the above the ancient woodland policy tests are considered below.

Would the development result in the loss or deterioration of the PAWS and Soils?

Method of soils translocation

6.10 The proposed method of soil translocation as set out by the Site Promoter is as follows:

"Sweet Chestnut Plantation would be removed, and the woodland soils within Land South and West of Hermitage Quarry would be treated as ancient. Soils would be recovered by mechanical means, drawing on the experience of work undertaken for the Westerly Extension as well as other examples nationally, including work for HS2 and other case studies discussed [in a Report Appendix]*. A detailed programme of soil translocation and woodland restoration would be devised to account for the phased removal and restoration."*

Assessment of Loss or Deterioration of the Soils

6.11 As a result of translocating the soils, disturbance would be expected to result through their mechanical excavation, loading, transportation, and deposit at the receptor site.

6.12 The Inspector's Report on the previous Inquiry stated:

"The Woodland Management Plan includes the translocation of the ancient woodland soils, along with some old coppice stools and their associated bryophytes.

They would be moved from one phase to another as part of the restoration scheme that is designed to create native woodland. With recent improvements in techniques, similar translocation schemes have been carried out elsewhere in the area and achieved reasonably good results, although time will tell if they retain those ancient woodland indicator species that have so far survived. Regardless of the relatively poor quality PAWS and the results achievable through translocation, this would not be the restoration of the PAWS lost to the scheme." (para 16.49)

"As recorded above, there are some species of biodiversity interest in the present non-native sweet chestnut woodland. Nevertheless, restoration to native woodland should, in the longer term, considerably increase the species richness with habitat enhancement for dormice, reptiles, badgers, birds, invertebrates and amphibians, as well as greater lichen and bryophyte diversity. However, also as noted above, the ancient woodland indicator species may not translocate very well and those that did survive would be very slow to spread because of their inherently poor colonising abilities." (para 16.60)

6.13 Once in place at the receptor site, the soils would be actively maintained and managed, to encourage the establishment of broad-leaved native woodland. The management of the land would be secured as a requirement of appropriate planning conditions/legal agreements attached to any future planning permission.

6.14 If it were concluded that there is no loss or deterioration of the soils in respect of their value as PAWS in a development scenario where the soils are translocated and actively managed for ecological benefit, when compared with the environmental baseline – then the remaining ancient woodland policy tests would not be invoked, and the site allocation would be acceptable in principle from this perspective. However, given that some deterioration in the quality of the soils will inevitably result from the translocation exercise, it is considered that this test is not met and the remaining elements of the planning policy test first need to be satisfied, specifically, are there *"wholly exceptional reasons"* which justify this, **and** *"does a suitable compensation strategy exist."* This is considered below.

Wholly Exceptional Reasons

6.15 There are other potential sources of crushed rock aggregate, and the capacity of Kent's wharf and rail infrastructure could potentially support additional imports. However, there is no clear alternative source of the Kentish Ragstone which is used as a building stone. Calls for Sites for both the previous iteration of the Plan and the current one, together with geological reports and alternative site searches conducted by the Promoter and the Council's professional advisors (Alternative Ragstone Supplies (WSP, June 2026)) have not identified any potential alternative sources of this essential material. Without the future development of Hermitage Quarry there would therefore be no continuing suitable source of Kentish Ragstone, and there would be no source of crushed rock suitable for the majority of uses for which it is required in Kent.

6.16 The need for the continued extraction of Kentish Ragstone for restoration of historic buildings including UNESCO designated buildings, and the fact that no viable

alternative sources are currently known to exist is considered a wholly exceptional reason for the purposes of the policy test, and aligns with the limited examples given in Footnote 70 of the NPPF.

6.17 The Kentish Ragstone cannot be extracted in isolation, and relies on the associated extraction of crushed rock to facilitate this. As a result, wider benefits also result which add further weight in respect of the *"wholly exceptional reasons"* which justify the plan allocation.

6.18 The proposed allocation would result in a supply of approximately 23Mt of crushed rock for aggregates purposes. The minerals would be used in construction projects of benefit to wider society including for applications such as the construction of roads (including for example the Lower Thames Crossing), schools and hospitals. When taken as a whole these benefits are considered to constitute "*infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills) where the public benefit would clearly outweigh the loss or deterioration of habitat."* as set out in NPPF footnote 70.

6.19 The proposed allocation would also result in benefits in respect of direct jobs protected (estimated at 140, plus indirect job opportunities arising from the estimated 400 companies associated with the local supply chain), as well as benefits to the wider economy including the skills training hub, and local supplier contracts.

6.20 The NPPF states that when determining planning applications 'great weight' should be given to the benefits of mineral extraction (para 224), including to the economy, with similar advice confirming that 'significant weight' should be placed on the need to support economic growth through the planning system (para 85).

6.21 The continued operation of the site would allow the contribution it makes to waste management and recycling in Kent to continue. The site processes CD&E wastes to produce a recycled aggregate (GAL is understood to produce approximately 250,000tpa currently but has capacity to produce up to 0.5 mtpa), and also use Air Pollution Control Residue waste from EfW plants (GAL is understood to process approximately 30,000tpa currently) mixed with quarry fines (the Hassock) to manufacture a lightweight material certified by the EA for use as a (non-waste) aggregate. The continued operation of the site would allow these functions to continue in the future. These benefits are considered to attract significant weight.

6.22 The continued operation of the site would also result in climate change and carbon benefits, due to removing the need to import potentially up to 23Mt of crushed rock into Kent from more remote locations. The carbon emissions from the transportation of this material would be significant, and its avoidance would accord with NPPF (para 161) in supporting the transition to net zero by 2050, and contribute to achieving radical reductions in greenhouse gas emissions. This benefit is considered to attract significant weight.

6.23 The continued operation of the site would allow for the continuation of the secondary aggregates manufacturing facilities, which provide material important to reduce the demand for primary minerals. Without the facility, the overall supply of

construction aggregates will reduce, and alternative sources to meet this demand will need to be found. This benefit is considered to attract significant weight.

Does a suitable compensation strategy exist?

6.24 When the current quarry extension was granted planning permission a very substantial package of mitigation/compensation measures were proposed. In qualitative terms this represented more than a 2:1 replacement of the area of Sweet Chestnut Plantation Woodland designated as PAWS which was lost. The compensation measures proposed previously are summarised in the table below:

Table 6.1 2013 PAWS Compensation Measures

Item	Area (ha)	Gains (cumulative, ha)
Removal of woodland to facilitate proposed development	-31	-
Native woodland restoration within application site	+33	2
New native woodland planted and managed	+26.6	28.6
Recently planted woodland to be managed	+4.3	32.9
Existing woodland to be managed	+41.8	74.7
TOTAL GAIN		**74.7ha**

6.25 In addition the formation of a 9Ha 'Habitat Creation Field' to the south-west of the site was initially proposed to receive the soil resources from early quarrying phases. A revision was made to the proposed phasing such that this soil would instead be used in the restoration of the existing quarry, and that the Habitat Creation Field would be formed at a very early stage and used principally as the site for the translocation of reptiles from the Application Site.

6.26 In respect of the proposed site, the Promoter has confirmed that they are willing to compensate to at least the same level of habitat creation as agreed as part of the previous permission.

6.27 This proposed compensation would include the following:

1. 49ha of woodland creation within the extraction area.
2. 48ha of habitat management/creation within GAL's landownership.
3. At least 57ha of habitat creation/management of woodland currently outside of GAL's ownership.

6.28 Currently point 2 includes the creation of traditional orchard and, while traditional orchards benefit biodiversity, it is not considered appropriate compensation for the

loss of PAWS. However, the Promoter has confirmed that if traditional orchard is not suitable, further off-site land can be secured at the planning application stage.

6.29 In addition, it is likely that there will be a need for mitigation for protected species (including birds, dormouse, reptiles and invertebrates), which would require detailed survey, mitigation and licensing through the EIA process for a planning application. As part of any future proposal it is possible the traditional orchard area could be used as part of a species mitigation strategy. Therefore, there may be a need to retain that area for use as part of wider plans for mitigation.

6.30 Compensation in respect of the LWS could take a similar approach to that discussed regarding PAWS ecological feature, with an emphasis on the reduction of habitat fragmentation within retained habitats, and the creation of new woodland habitats. It is unlikely that newly created habitats would be able to support a range of taxa similar to that which would be lost for a number of years. However, creating habitats years in advance of the potential loss of the LWS habitats, could potentially provide areas fauna could be translocated into prior to the commencement.

6.31 Overall, the proposed compensation strategy would provide gains (area/%) at least equivalent to that of the 'Westerly Extension', which was previously permitted by the Secretary of State for new native woodland and managed existing woodland. In addition, the strategy proposes a qualitative gain to be achieved by replacing non-native plantation with native woodland, The total net compensation would provide a gain of +112 hectares which consists of new native woodland planting and enhanced management of existing woodland. This excludes the 42 ha of woodland to be lost to mineral working). The total woodland creation and enhancement equate to 154 ha, which would be created compared to the 42 ha woodland (41ha of PAWS) which is assumed would be lost to facilitate mineral working. This equates to a 266% increase of native mixed species woodland (by creation and enhancement).

6.32 In respect of the potential Hermitage Quarry plan allocation, it is considered that the Promoter has demonstrated that the minimum area of habitat creation, restoration and/or active management required for a suitable compensation strategy can be implemented as part of any future application. Further details of the compensation strategy would be provided as part of any planning application process, in accordance with the principles included in the updated development management criteria in the Pre-Submission Draft Sites Plan. At plan making stage, a proportionate approach is required as to the level of detail needed to satisfy NPPF policy test. In principle it is considered that this would therefore represent a "suitable compensation strategy" for the proposed loss of PAWS as required by planning policy tests.

Planning Balance

6.33 The benefits of developing a site in this location, as set out earlier, which are considered to constitute "wholly exceptional circumstances" for the purposes of the policy tests in respect of PAWS would all weigh in favour of the allocation. However, a number of harms would also result from the proposal, which weigh against it in the

planning balance. These are addressed earlier in Section 3 of this report, and the weightings these harms are attributed in the planning balance are set out below.

6.34 The allocation of the site would result in the loss of a significant area of sweet chestnut coppice plantation designated as PAWS, which is considered an irreplaceable habitat under NPPF para 193(c). Although other land will be provided and managed as part of the proposed compensation strategy, the loss of this habitat is considered to attract great weight.

6.35 The allocation of the site is likely to result in amenity impacts, particularly as a result of blasting as the means by which the crushed rock would be recovered. However, with mitigation these adverse impacts could be managed within acceptable levels. The overall impacts in respect of amenity and health are therefore considered to attract limited weight.

6.36 The allocation of the site would result in minor adverse visual impacts, although the Site as a whole is relatively well screened. The overall impacts in respect of visual impact and landscape character are therefore considered to attract limited weight.

6.37 Hermitage Quarry has good access to the Strategic Highway Network, and although there are moderate issues with access to the Primary Route Network and Secondary Route Network, these impacts could be mitigated through planning obligations which could include a cap on HGV movements during peak traffic periods. The overall impacts in respect of highways are therefore considered to attract limited weight.

6.38 The site could have a minor adverse impact on groundwater SPZs or water resources in the absence of low-level mitigation, but the potential hydrogeological impacts are highly likely to be acceptably managed, when addressed through EIA. The overall impacts in respect of hydrology and hydrogeology are therefore considered to attract very limited weight.

6.39 There are no designated heritage assets within the proposed extension area. There are designated heritage assets around the site but nothing immediately adjacent. In terms of significant remains, there is potential for significant geo-archaeological and Palaeolithic remains (which can be managed through planning conditions), and there is also a possible 19th century shooting box, which might merit preservation *in situ*. The overall impacts in respect of archaeology and cultural heritage are therefore considered to attract moderate weight.

6.40 The site is near to an AQMA or may have adverse impacts on air quality, however technical assessment has shown that any impacts are likely to be possible to manage within acceptable levels. The overall impacts in respect of air quality are therefore considered to attract limited weight.

6.41 Small parts of the site contain best and most versatile land which would be impacted by the development. Opportunities for mitigation and restoration exist, but the land

could not be restored to the same agricultural grade. The overall impacts in respect of agricultural land, although a limited area, are therefore considered to attract moderate weight.

6.42 The site would impact upon Public Bridleway MR108 which runs through the site, which provides both a strategic link across the wider area, and also an important leisure route for walkers, cyclists and equestrians. There are also a number of permissive paths on the site. However, the bridleway would be subject to diversion and so the overall impacts in respect of rights of way and recreation, once properly mitigated are considered to attract limited weight.

6.43 While the conclusions of this report are based on the current NPPF, KMWLP 2024–39, current LAA, current SA and updated technical evidence, the Secretary of State's Decision Letter (13 July 2013) for the Appeal on the previous extension to Hermitage Quarry, provides important context. In particular, the Secretary of State concluded that the planning benefits of the proposal as a whole *"clearly outweighed"* the adverse impacts, stating in paragraph 36:

"The Secretary of State concludes that the proposed Westerly Extension would comply with the Development Plan, except to a limited extent in terms of landscape and tranquillity considerations. He considers that it would also prolong the limited effects on nearby residents' amenities. However, he considers that the very considerable need for both crushed rock aggregates and dimension stone, together with the eventual biodiversity improvements, and the ongoing socioeconomic benefits, would clearly outweigh the loss of the ancient woodland and the other adverse effects of the development in this case; and therefore that the loss of ancient woodland would not be contrary to Development Plan policy."

6.44 It is important to note that the test for the acceptability of harm to PAWS designations has strengthened from a requirement that the benefits "clearly outweigh" the harm, to a requirement that *"wholly exceptional circumstances"* exist. However, his letter acknowledges that there is a *"very considerable"* need for both dimension stone and crushed rock aggregates, biodiversity improvements would result, and that the socioeconomic benefits weighed in favour of the proposed extension at that time.

6.45 It is considered that the overall planning considerations as summarised in this Report are broadly similar to that which existed at the time of the Secretary of State's 2013 decision, and that the planning benefits of the current proposed extension, when taken as a whole, should be considered *"wholly exceptional circumstances"* which justify the proposed Plan Allocation.

<u>Other ecological benefits</u>

6.46 The strategy would result in ecological benefits over the retention of sweet chestnut coppice plantation, but these were excluded from the consideration of exceptional circumstances and planning balance, because in policy terms, the retention of PAWS is required in principle. The sweet chestnut plantation is dense and of lower

ecological value than native woodland as proposed in the compensation strategy, and opportunities to require the land to be managed for ecological benefit in the future will secure valuable additional habitats through progressive restoration.

6.47 A compensation strategy would seek to protect any ancient value in the soils and aim to deliver a significantly higher value native broadleaved woodland to replace the existing non-native monoculture. Compensation areas would be established ahead of time, such that species would not be left without habitat. The development is expected to deliver a significant net gain in area of woodland habitat.

Overall Conclusion

6.48 There is a very strong argument for allocation of the site on the basis of the need for Kentish Ragstone for heritage restoration purposes. This, and the other benefits that would flow from the associated extraction of the crushed rock needed to maintain a steady and adequate supply are considered to be wholly exceptional circumstances for the purposes of policy tests in relation to the PAWS designation.

6.49 There is also a very strong argument not to allocate the site, on the basis that it is designated as PAWS, which in planning policy terms is considered irreplaceable as a habitat and should be avoided. However, it is a significant factor that no alternative sources where suitable dimension stone could be quarried are currently known to exist, despite considerable efforts to identify these.

6.50 Overall, wholly exceptional reasons exist which justify the allocation of the site, sufficient information has been provided to demonstrate that a suitable compensation strategy for the PAWS lost is capable of being secured, and the planning benefits of the allocation clearly outweigh the harms in the subsequent planning balance. Allocation of the site in the plan is therefore considered to be sound based upon the current information available. However, due to the significance of the issues in respect of the preservation of PAWS and the conservation of our heritage, it is right that this is fully tested through a plan examination process. Careful thought will need to be given to further evidence and stakeholder feedback received as part of this further process, and appropriate changes made to the overall approach should these be required.

Appendix 1 – Document Reference List

- National Planning Policy Framework (as updated Feb 2025)
- Kent Minerals and Waste Local Plan 2024-39
- Inspector's Report for Appeal V/1/2158341 (11 March 2013)
- Secretary of State for Department of Communities and Local Government, Decision Letter, Hermitage Quarry, Hermitage Lane, Aylesford, Application Ref. TM/10/2158341 11.07.13
- KCC Initial (RAG) Assessment of the Suitability of Nominated Land to the South and West of Hermitage Quarry for Hard Rock (May 2023)
- Consultation Statement (Regulation 18 outcomes summary).
- Sustainability Appraisal
- Kent Local Aggregate Assessment 2025 (2015-24 data), June 2026
- GAL original response to Call for Sites with details of Land to the South and West of Hermitage Quarry
- Draft Site Identification and Selection Methodology, September 2022
- Draft Kent Mineral Sites Plan including details of nominated hard rock site, May 2023
- Nomination of Land South and West of Hermitage Quarry for Allocation - Socio-Economic Impact Assessment, BPP Consulting, June 2026
- Hermitage Quarry – Environmental Support – Ecology, WSP, June 2026
- Alternative Ragstone Supplies, WSP, June 2026
- Minerals Sites Plan: Hermitage Quarry Landscape and Visual Technical Note, WSP, June 2026
- Carbon Assessment for Potential Extension of Hermitage Quarry, WSP, June 2026
- Hermitage Quarry Air Quality Review, WSP, June 2026
- Health Impact Assessment, WSP, June 2026
- Gallagher Aggregates Limited (GAL) 'Case for Continuation' (June 2026), and its appendices:
  - A Gallagher Presentation - Introduction and Overview. Gallagher Aggregates, June 2026
  - B Aggregates Need & Supply – Planning Context. Hearnshaw Planning, January 2026
  - C Premium Limestone and Kentish Ragstone Masonry – Planning Context. Hearnshaw Planning, January 2026
  - D Gallagher Aggregates Example Markets and Projects. Gallagher Aggregates, March 2026
  - E Ecological Assessment. Ecology Solutions Limited, March 2024
  - F Biodiversity Net Gain Assessment/Hazel Dormice. Ecology Solutions Limited, March 2024
  - G Biodiversity Net Gain Assessment/Hazel Dormice. Ecology Solutions Limited, October 2024
  - H Annual Report to Management Advisory Group (Westerly Extension). Red Ecology, November 2025

I Technical Note: Ecology Statement – Research and Case Studies. Red Ecology, February 2026

J Wessex Archaeology – Ecology Note (Summary of reports included as Appendices K, L and U). Ecology Solutions Limited, March 2024

K Geoarchaeological Borehole Survey Interim Report. Ecology Solutions Limited, March 2024

L Interim Report on the Geochemical Analysis. Ecology Solutions Limited, March 2024

M Alternative Sites Study – Kent

- Main Document and Appendix A: Detailed Assessment for Sites (A/25&30 Pikey Lane and East Malling Heath; Site D/51-Ditton South; Site E/55-Small Profts West; Site H/94 Langley Park; Site I/101 Stoneacre Farm; Site J/106 Leeds South East; Site K/107-Burberry Lane Site O/115-Chegworth; and Dwg.GAL-HQ-23-11-B showing site locations. Hearnshaw Planning/Gallagher Aggregates, January 2024
- Geological Information. Hearnshaw Planning/Gallagher Aggregates, February 2024

N Qualitative Assessment of Premium Crushed Rock. Gallagher Aggregates, November 2023

O Carbon Footprint Study for Freighting Aggregates. Carbon Footprint, January 2024

P GHG Emissions Savings Analysis for Reduction Measures used Hermitage Quarry. Carbon Footprint, January 2024

Q Review of Kent Planning Policies – Embodied Carbon and Sustainability Considerations. DHA Consulting, December 2023

R Gallagher Aggregates - Social Value Overview. Gallagher Group, Collins McHugh Limited, March 2026 (Amended Apr 2026).

S Natural Capital Report. Savills, May 2024

T Proposed Landscape Strategy 2024 Draft. Hill-Wood and Co. April 2024

U Archaeological Desk Based Assessment. Wessex Archaeology, March 2024

V Transport Technical Note including Air Quality/Environmental Aspects. Stantec, December 2023

W Services and Utilities. Feedback from communications with UK Power Networks (UKPN)

X Initial review of proposed extension on land to the South and West of Hermitage Quarry in relation to blast vibrations. Blast Log Ltd, December 2023

Y1 Proposed Site Allocation Plan. Gallagher Aggregates GAL-HQ-26-10

Y2 Existing Condition Plan Gallagher Aggregates GAL-HQ-26-20 and Indicative Quarry Phasing Nos 1-4 Gallagher Aggregates GAL-HQ-26-21 to 24

Z Hermitage Quarry – Completed Restoration Areas. Gallagher Aggregates GAL-HQ-26-06