

KENT MINERALS AND WASTE CORE STRATEGY ISSUES CONSULTATION (SEPT' 2010)

TONBRIDGE AND MALLING BOROUGH COUNCIL'S (TMBC's) REPRESENTATION

Issue	TMBC Response
General – Climate Change	
<p>Q. Are there any other ways that planning for minerals and waste could contribute to meeting the climate change challenge?</p>	<p>The extraction and transportation of minerals and waste is quite carbon intensive. The policy should be focussed on reducing the need for winning additional reserves by encouraging the recycling of existing materials, particularly on construction sites. With the significant majority of development taking place on previously developed land often involving redevelopment of existing buildings - in accordance with national planning policy - there must be considerable potential for this to take place.</p> <p>Protocols for minimising waste during redevelopment projects such as the ICE Demolition Protocol should be promoted as good practice. Policy CC2 in TMBC's Managing Development and the Environment Development Plan Document (MDE DPD) promotes this approach at the local level.</p>
General – Transportation	
<p>Q. Are there any other ways that future minerals and waste developments can minimise transportation impacts upon local communities?</p>	<p>The response to this question is very similar to the response to the question on Climate Change (see above). To help minimise transportation impacts the strategy needs to prioritise reducing the need for newly won minerals for construction by requiring the use of recycled materials from or near to development sites. If developers are required to recycle construction materials on-site, by following Protocols such as the ICE Demolition Protocol, then the need for trips by HGVs carrying materials to sites will be reduced. This will benefit local communities, whose lives have in the past been disrupted by HGV movements, through noise, dust and risk to pedestrian safety.</p>
General – Restoration and After-use of Minerals and Waste Sites	
<p>Q. Quarry restoration options must be considered at an early stage in the plan making process and only sites that can</p>	<p>Agree. This stance is a good one to take. However, it is important to appreciate that for some communities the most important aspirations to them are accessibility to affordable homes, employment opportunities etc which are clearly not traditional 'green' restoration options. This does not necessarily mean that pursuing</p>

<p>deliver innovative sustainable restoration solutions that assist both biodiversity and community aspirations will be acceptable. Do you agree with this stance?</p>	<p>community aspirations such as these will mean that biodiversity objectives are sacrificed. Provided the wide range of environmental, economic and social issues are identified and addressed at the conception stage of any restoration proposal these objectives do not have to be mutually exclusive.</p>
<p>General – Impacts on Kent’s Environmental Assets</p>	
<p>Q. Should there be a hierarchy of protection of nationally/internationally designated areas as well as locally important environmental assets, with the highest level of protection being given to international and nationally designated areas?</p>	<p>There is no compelling reason why the protection of environmental assets should be set in a hierarchy. They each have value, just at different scales for different reasons. Just because an asset has local value it should not be more susceptible than an area of international importance – this could potentially reduce the biodiversity value of a site. What is important is that irreplaceable assets, e.g. ancient woodland, should be afforded high protection because once they are gone they are lost forever. In this respect, if it is evident that no mitigation measures can be introduced to replace (like-for-like) an environmental asset under threat of loss, then that particular asset should enjoy the highest level of protection.</p>
<p>General – Need for Strategic Sites for Minerals/Waste</p>	
<p>Q. Should the MWDF Core Strategy identify strategic sites for minerals/waste?</p>	<p>At this stage there is insufficient evidence to answer this question. The identification of strategic sites needs to be evidence based. The need for strategic waste sites should be informed by and be compatible with the Kent Waste Strategy.</p>
<p>General – Timing of Consultation</p>	
<p>General Comments</p>	<p>The timing of this consultation is questioned given the recent change of Government and the emergence of the Localism Bill and the White Paper- Local Growth: realising every place’s potential. The key message from central government is that planning, whether it is for homes, employment or minerals and waste is best done at the local level. At present, for some districts in the County where there are no, or only a few adopted Local Development Framework DPDs in place, there is uncertainty as to what levels of growth will be acceptable, although it is clear that whatever decision is made it is at least evidence based. It may be sometime before each district, in consultation with local stakeholders, reaches an agreed position on the exact level of growth. This situation is common place in other districts across the country. A further complication is that there is likely to be little harmony between the timeframe for the MWDF and the LDFs produced by the districts.</p> <p>It is therefore very difficult to make clear judgements on the need for additional sites for construction aggregates during the plan period. Given that the need for aggregates such as crushed rock, sand and gravel is inextricably linked to the demands of the construction industry - as highlighted by para. 4.1.12 in</p>

	<p>the consultation document - surely the best way forward is to delay the production of the MWDF until a clearer picture emerges from the districts of the scale of development that is likely to take place during the plan period. Otherwise, one outcome could be that the MWDF allocates a site for quarrying when it transpires in the near future that there is no demonstrable need.</p> <p>The need to reconsider the timetable for progressing the MWDF is further underlined by paragraph 3.23 in the Government's recently published White Paper – 'Local Growth: realising every place's potential'. It states: '<i>...the supply of aggregate minerals and planning for waste will become the responsibility of the Planning Inspectorate's recently announced Major Infrastructure Planning Uni.</i>' At this stage the implications of this statement for planning for minerals and waste at the local level are not entirely clear and questions need to be asked of central government. During this time of change , surely it would be wise to stall progression of the MWDF until details of the Government's proposals for planning are at least more clearly defined and there is certainty over the future of MWDFs.</p>
Minerals	
<p>Crushed Rock Supply:</p> <p>Q. The landbank for crushed rock (ragstone) appears to be more than sufficient for the plan period. However there have been concerns raised by operators about the quality of the largest consented ragstone deposit. In view of this:</p> <p>Should further areas for ragstone working be identified and allocated in the minerals and waste Development Plan Documents if there is no need to do so to meet national policy requirements?</p>	<p>Paragraph 4.1.19 identifies that the permitted reserves (at Hermitage Quarry and Blaise Farm Quarry) are well in excess of 30 mt, which is double what Kent need to plan for (theoretically) during the plan period. On this basis, further areas of ragstone working should not be identified during the lifetime of the DPD because there is demonstrably no need. The operators should be required to substantiate their concerns with evidence, otherwise there is no reason to identify additional areas. It is important to appreciate that planning for the winning of minerals will not cease at the end of the plan period (2030). It would therefore be irresponsible to identify and work additional areas now until existing reserves have been effectively won. This issue can be kept under continual assessment through annual monitoring of the performance of the MWDF. The results in the Annual Monitoring Report should form the basis for decisions on whether a review is needed of the MWDF and if additional areas need to be identified.</p> <p>Please Note: The approach outlined above is equally applicable to the need for sites for other minerals.</p>