

**TONBRIDGE & MALLING BOROUGH COUNCIL**

**PLANNING and TRANSPORTATION ADVISORY BOARD**

**27 July 2011**

**Report of the Director of Planning, Transport & Leisure**

**Part 1- Public**

**Matters for Recommendation to Cabinet - Non-Key Decision (Decision may be taken by the Cabinet Member)**

**1 KENT MINERALS AND WASTE DEVELOPMENT FRAMEWORK – RESPONSE TO OPTIONS CONSULTATION**

**Summary**

**Kent County Council (KCC) is consulting at the options stage of the Minerals and Waste Development Framework (MWDF). This report recommends a response to KCC on the consultation documents.**

**1.1 Background to the Options Consultation**

- 1.1.1 Kent County Council is the Minerals and Waste Planning Authority and has a responsibility to prepare a Development Framework to set policy and make provision for sites in respect of mineral extraction and waste disposal.
- 1.1.2 The MWDF comprises the Core Strategy, the Minerals Sites Development Plan Document (DPD) and the Waste Sites DPD. The Core Strategy sets out strategic policy options whilst the sites DPDs contain the sites that have been received by KCC during the 'call for sites' exercise.
- 1.1.3 The 'Options' is the second stage of the consultation process. The first stage in the preparation of the Core Strategy was the Issues consultation which took place during the latter months of 2010. The Council submitted a response to KCC during this first stage.
- 1.1.4 The first stage in the preparation for both the Minerals and Waste Sites DPDs was the 'Call for Sites'. This exercise commenced at the end of May 2010 and concluded on 30<sup>th</sup> June 2011. The 'Call for Sites' asked operators and landowners to bring forward suitable sites for minerals and waste development that could be developed between 2012 and 2030. As a result of the deadline for the 'Call for Sites' overlapping the consultation on the Options, there will be a second Options consultation during the Autumn on those sites that have come forward since the current DPDs have been published.

- 1.1.5 The Core Strategy 'Issues' consultation took place during the latter months of 2010. The Issues document was informed by the evidence base which looked at the capacity of existing minerals and waste sites and how this related to identified need. The Council made formal representations on this document. These comments were reported to this Board on 17 November 2010.
- 1.1.6 The purpose of this current (Options) stage differs between the Core Strategy and the Sites DPDs. In the Core Strategy, policy options are presented and where applicable an indication of the preferred option is provided. For the Sites DPDs this is an informative stage only, simply involving the publication of the sites received by KCC during the Call for Sites exercise (up until the publication of the documents in May 2011).
- 1.1.7 The next stage of the Core Strategy preparation process is the 'pre-submission' stage which KCC anticipate being held in November-December 2011. This will be the final consultation stage before the plan is submitted to the Secretary of State for consideration at an Examination in Public, which is to be held in June 2012.
- 1.1.8 There are a few more stages in the preparation of the Sites DPDs. The next stage (following the second Options consultation) will be the Policy Directions Stage which is the *Preferred Options*. This was planned to take place during November/December 2011 but in light of the additional sites that will need to be consulted on during the autumn, this is likely to be delayed until the beginning of 2012. The timetable for the remaining stages may, as a consequence slip. Following the Policy Directions Stage, KCC anticipate producing the Pre-Submission Sites DPDs for consultation during November/December 2012. This will be the final consultation stage before the DPDs are submitted to the Secretary of State for consideration at an Examination in Public which is to be held in June 2013.
- 1.1.9 In April 2011, officers submitted planning details (setting out existing permissions and policy constraints) to KCC on the sites received during the Call for Sites exercise. This information will feed into the decision-making on the Preferred Options.

## **1.2 Consultation Matters – Timing of Consultation**

- 1.2.1 The Options is the second stage of the plan-making process for the three DPDs. This means that a considerable amount of work has already been undertaken by KCC in advancing the documents. Currently the wider planning policy framework is in a state of flux, with the draft National Planning Policy Framework due for publication at the end of July and the South East Plan proposed for abolition through the Localism Bill.
- 1.2.2 ***Proposed Response*** – The current timetable for the MWDF plan-making process is questioned in light of the uncertainty over the wider current planning policy framework. It may be wise, in the interest of producing a sound and robust suite of DPDs, to delay to the preparation process until at least the National Planning

Policy Framework (NPPF) has been produced and the implications for minerals and waste planning have been fully assessed. It is anticipated that this would not delay the process significantly and would have the benefit of ensuring that the DPDs are in conformity with national policy guidance, a key 'Test of Soundness' for preparing plans.

### 1.3 Consultation Matters – Core Strategy

1.3.1 The Core Strategy is an important document in the MWDF. It will identify the overall need for and make provision for the amount of waste treatment, mineral extraction and recycling that will be required in the County up to the end of 2030. It will also identify the spatial pattern for minerals and waste development and identify broad areas showing where new facilities and sites are needed. It will safeguard existing mineral importation facilities at wharves and rail sidings. In terms of the plan-making process, decisions on the sites that will feature in the Minerals and Waste Sites DPD will be influenced by the policies in the Core Strategy. For these reasons, it is important that the Council makes full and detailed representations on the options presented in the current consultation document.

#### Suggestions for Strategic Sites for Minerals

1.3.2 The Core Strategy contains the vision, objectives and strategic policies for minerals and waste planning in for the period up to 2030. The first option (Option 1) relates to the identification of a strategic site for minerals development. KCC's preferred option is the consented cement works and its associated mineral reserve at Medway Works, Holborough (Option 1A). This preferred option would accord with national minerals policy requirements and would represent the only opportunity to re-establish cement manufacture in Kent.

1.3.3 **Proposed Response** – There are no objections to Medway Works, Holborough being identified as a strategic site in the Core Strategy (Option 1A) because it enjoys the benefit of a planning permission. However, the option identifies that the design and layout will need to be revised and planning permission sought for amendments prior to construction of the facility. To provide assurance that the revised proposal will not harm the local environs and community of nearby Snodland, the option should clearly state that the local impacts of the revised proposal will need to be equal or less than those of the permitted scheme. This would include matters such as the impact on the landscape in terms of the scale and massing of the development and the impact on the highways network.

#### Suggestions for Strategic Sites for Waste

1.3.4 Strategic sites for waste are suggested, one of which is the existing operational composting facility at Blaise Farm, West Malling. However KCC has not identified a preferred option. This is because the waste facility needs to have the capacity to accommodate and treat flu ash from the Allington Energy from Waste plant. Norwood Farm, Sheppey currently accommodates the incinerator flu ash and if a

suitable solution for the treatment of this 'flu ash' becomes apparent, it is likely that KCC will support Norwood Farm as a strategic waste site in the Core Strategy.

### **Strategy for Minerals and Waste Sites**

- 1.3.5 The other policies in the Core Strategy focus on the strategies for planning for the various forms of minerals and waste. The options presented for minerals have been informed by the apportionment of land-won aggregates set out in the 'Proposed Changes' to Policy M3 in the South East Plan and have taken into account the capacity of existing reserves. Essentially the options presented focus on whether additional sites should be identified reflecting the current availability and identified need. In terms of Waste, KCC has identified that there is variation across the county in the location of existing management facilities (para. 2.5.4). It states that *'North and Mid Kent are relatively well served by facilities for transfer, treatment and recovery of Municipal Solid Waste, but East Kent is less well served. Providing a balanced and accessible network of facilities is an objective of the MWDF.'*
- 1.3.6 **Proposed Response** – The Strategy for minerals planning should be underpinned by the principle of making best use first, in an effective and efficient way, of existing reserves to meet the identified need during the plan period before consideration is given to identifying new sites. This should feature in the Spatial Vision and the strategic objectives. This principle will help to ensure that the *'naturally and historically rich and sensitive environment of the Plan area'* is protected for future generations to enjoy, an important element of the draft Spatial Vision. It will also enable responsible longer-term planning for minerals by ensuring reserves are only allocated and worked when a need is identified and the capacity of existing sites can not meet the need. It is important to appreciate that whilst the plan has a timeframe of up to 2030, it would be short-sighted to not have one eye on the period beyond the endpoint of the MWDF.
- 1.3.7 With this in mind the Council supports Option 3A of not identifying any crushed rock sites as the landbank for crushed rock is more than sufficient for the plan period and beyond (taking into account an extra 10% for flexibility). This option is supported by the results of the Sustainability Appraisal and also the responses to the Core Strategy 'Issues' document. The Council made a similar representation at the Issues stage.
- 1.3.8 The draft Spatial Vision and objectives for planning for waste management facilities is supported. It is important, in the interest of sustainability, that waste is handled close to where it is produced to reduce transport costs and impacts. It therefore makes sense as a matter of general approach to focus on achieving a balanced and accessible network of facilities across Kent by plugging the gaps, especially in East Kent, where significant growth in the Ashford area is planned for. However, the strategy should build in sufficient flexibility to enable local

variations to such an approach if they are justified by significant efficiencies and where proposals can support local sustainable waste management strategies.

### **Options for Provision for Municipal Solid Waste (MSW)**

- 1.3.9 The options for planning for municipal waste are based on whether a high growth (Option 12A) or low growth forecast (Option 12B) is used. KCC has indicated that the preferred option is to use the low growth forecast (Option 12B) for municipal solid waste arisings over the plan period. This decision is based on the fact that KCC has long term waste management contracts in place for the management of its MSW, most significantly including the contract with the Energy from Waste (EfW) plant at Allington, which include contingency measures for the management of MSW should there be unanticipated increase in the generation of MSW in the county.
- 1.3.10 **Proposed Response** – The Council can conditionally support Option 12B for the provision for Municipal Solid Waste. This support is conditional because the option is not the most cautious of the two and whilst there are reassurances that existing contracts include contingency measures, it is not possible to confidently predict the scale of unanticipated increases in the generation of MSW in the county. There are also other external factors including National and European Legislation that will have an impact, although this is likely to support the preferred option, with pressure to reduce the amount of waste produced and increase the amount that is reused and recycled.
- 1.3.11 This support is therefore based upon the condition that the preferred option, if it becomes policy, is kept under detailed review on an annual basis. This review process should include an up-to-date analysis and report on the growth and development management strategies in the districts throughout the county as identified in Local Development Frameworks. The level of development identified in these documents will be a significant factor in the likely amount of MSW arisings in the future and it therefore needs to be closely monitored.

### **Options regarding Additional Composting and Recycling Capacity Required for MSW**

- 1.3.12 The options are based on whether a low level (Option 13A) or high level forecast (Option 13B) is used. KCC has indicated that Option 13A – low level forecast is the preferred option because it is unlikely that the higher end of the composting range will be needed given that the Allington EfW plant will take 40% of Kent's MSW throughout the plan period. This option means that the plan must make provision for additional capacity for small volumes of composting of MSW (47,000 tonnes).
- 1.3.13 **Proposed Response** – The Council can conditionally support Option 13A for the provision of additional composting and recycling capacity required for MSW. This support is conditional on additional capacity focusing on plugging the gaps in

current provision for waste management in East Kent, as identified in the draft Spatial Vision for the Core Strategy.

### **Recycling/Composting Capacity for Commercial & Industrial (C&I) Wastes**

- 1.3.14 The options are based on whether a low forecast (32,000 tonnes per annum (tpa)) (Option 14A) or high forecast (311,000 tpa) (Option 14B) is used. KCC has indicated that Option 14B – high forecast is the preferred option. The justification is that very little C&I waste is incinerated; the costs of landfill are increasing; a possible ban (European Regulations) on the landfill of some wastes and the eventual closure of existing landfill sites. All these factors combined mean that there will be demand for alternative solutions for C&I waste. The Core Strategy states that new data has resulted in a recalculation of the high forecast and the total figure for MSW and C&I required is 260,000tpa.
- 1.3.15 **Proposed Response** – The rationale for calculating the requirements for recycling/composting needs to be transparent and robust. It is a little disconcerting that the requirement for the high forecast has changed during the preparation of the Options document by over 30%. Nevertheless, Option 14B would help to deliver draft strategic objective 11 of reducing the amount of Kent’s non-hazardous waste being disposed of in landfills, which is also an important element of the draft Spatial Vision for the Core Strategy. On this basis conditional support is provided for Option 14B. This support is conditional upon KCC being able to effectively demonstrate that the evidence base is robust and that the preferred location for additional capacity is East Kent in view of the lack of facilities there as identified in para.6.3.17 and reflected in the draft Spatial Vision.

### **Additional Landfill Space for Kent’s Non-Hazardous Wastes, Non-Radioactive Wastes**

- 1.3.16 Option 15 relates to additional landfill space for Kent’s non-hazardous wastes. KCC has indicated that the need to identify land for possible use for non-hazardous waste landfill in Kent would appear to be unjustified and unrealistic. This is because of the void space available in consented landfills and the encouragement, through policies in the MWDF, for the treatment of C&I wastes, including new capacity for EfW plants.
- 1.3.17 **Proposed Response** – The Council can support the policy of not identifying new landfill void space for non-hazardous waste. The evidence presented, along with the strategy of treating waste (driven by European and National policy) justifies this as a sound and robust policy direction.
- 1.3.18 Option 16 does not impact on Tonbridge and Malling Borough. It relates to temporary storage and management of low level nuclear waste and very low level nuclear waste at Dungeness.

## **Delivery Strategy and Development Management Policies**

- 1.3.19 The structure of the remainder of the Core Strategy differs from the first half. Instead of providing alternative options it sets out draft policies on delivery and development management.
- 1.3.20 **Proposed Response** – The current stage of the plan-making process is the Options Stage. If, at this stage, the Core Strategy is to include policies on delivery and development control and management, alternative options should be presented. This is not the case. Instead draft policies feature in the document, which is the purpose of the next stage of the plan-making process. It is therefore not possible to respond to these sections of the Core Strategy because all the options are not available. Furthermore, it seems premature to prepare development control and management policies because the draft National Planning Policy Framework (NPPF) has not been published yet. There is a possibility that some matters identified in the Core Strategy will be addressed in the NPPF, whilst some matters may not be considered appropriate for local minerals and waste plans. With this in mind, it is considered that the sections on delivery and development control and management should be reviewed in light of the NPPF when it is published. In the interest of ensuring stakeholders are given the chance to consider available options for these matters, these sections could possibly be published again in the autumn, reflecting the impact of the NPPF and setting out genuine choices on each issue.

## **1.4 Consultation Matters - Minerals Sites Development Plan Document (DPD)**

- 1.4.1 This document differs in its purpose to the Core Strategy, in that it has been published for informative purposes only. It essentially contains all the Minerals sites (up until the publication of the document in May this year) received by KCC during the 'Call for Sites' exercise. KCC are seeking initial views and opinions from members of the public and stakeholders on the sites put forward.

### **Minerals Site Assessment Criteria**

- 1.4.2 Prior to the list of sites, the DPD sets out the criteria that will be used during the decision-making on which sites will be taken forward and feature in the Preferred Options document which is anticipated to be produced in the early part of 2012.
- 1.4.3 The list of criteria is long and full and includes:
- general site information
  - showstoppers (eg planning permission already exists for alternative use)
  - planning policy designations
  - other land use constraints (eg nearest dwelling and school)

- operational constraints (eg width of public highway)
  - opportunities (distance to other waste/mineral sites)
  - mineral opportunities (eg geology of site)
  - water (eg ground water vulnerability)
- 1.4.4 **Proposed Response** – The assessment criteria is very extensive and covers most of the important matters. However it is not complete and certain criteria needs to be corrected.
- 1.4.5 Sites of Nature Conservation Interest (SNCI). This term (SNCI) is no longer used and such sites are now known as Local Wildlife Sites (LWS). This needs to be corrected.
- 1.4.6 The designation list under the heading ‘Constraints’ is incomplete. No reference is made to Regionally Important Geological Sites (RIGS) or Biodiversity Opportunity Areas (BOAs) (as identified in the Kent Biodiversity Action Plan). Consideration needs to be given to these designations when assessing sites. In addition key elements of green infrastructure, for example publicly accessible open spaces, protected in statutory Development Plan Documents should also form part of the assessment criteria because the loss of these could weaken existing green networks and result in a deficiency of supply for the local community.
- 1.4.7 Under ‘Operational Constraints’ the proximity and capacity of the nearest highway should be assessed. This could potentially feature under ‘Opportunities’ as well.
- 1.4.8 The assessment of the sites should not just focus on the performance of each site against the individual criterion listed in the DPD. The wider cumulative impacts also need to be taken into account, especially if there are a few sites located close to each other which are likely to use the same infrastructure, eg highway network. The outcome of the cumulative impact assessment, along with the assessment result for all the sites, should be published alongside the Preferred Options document as evidence for the decision-making process.
- 1.4.9 It is considered that the linkages between the Sites DPD and the over-arching Core Strategy are insufficient. KCC has indicated a clear way forward on many mineral (and waste) matters, for example East Kent being the preferred location for additional waste sites. There is also a clearly defined spatial vision and draft strategic objectives. The assessment stage should therefore build-in a process whereby each promoted site is systematically assessed against the draft spatial strategy vision, draft strategic objectives and, where applicable, preferred option (where indicated). This could take the form of a spreadsheet where conformity of the sites with each of the above elements is demonstrated by a simple tick. This would be a transparent way of demonstrating if and how the sites would help deliver the strategy for minerals and waste planning during the plan period.



1.4.10 Finally, it is considered that qualitative assessment criteria should be included. Under the heading 'Other Land Use Constraints' the criteria focus on distances to homes and community facilities. However, it does not reflect on the density and scale of nearby development which would affect the degree sensitivity. The issue of the openness of an area and the value of this to communities possibly living at a distance from the site is considered important. With this in mind, one of the criteria should be proximity to nearest settlement. This is also important because of the issue of noise which could be a significant factor.

### **Minerals Sites**

- 1.4.11 The rest of the DPD sets out all those sites that had been received by KCC during the 'Call for Sites' exercise (up until the publication of the plan). Additional sites have come forward since the Options documents were produced and these will be published in the autumn for public comment.
- 1.4.12 Annex A sets out all of the minerals sites received by KCC which fall within Tonbridge and Malling Borough. The list also includes two sites that fall just beyond the borough boundary (in Maidstone and Tunbridge Wells).
- 1.4.13 Annex B sets out a table of information supplied by officers of the Council to KCC outlining important planning information eg existing permissions and Local Development Framework and/or Saved Policy constraints.
- 1.4.14 **Proposed Response** – There are several minerals sites promoted in and adjoining the Borough of Tonbridge and Malling. These cluster in the Borough Green area and along and across the border of the borough with Maidstone and Tunbridge Wells. As a result, it is important that the cumulative impacts of these sites is assessed and documented at the next stage (Preferred Options) in the plan-making process.
- 1.4.15 The Council is specifically concerned about the promoted sites of land adjacent to Platt Industrial Estate (site ref 6) and Celcon Works (site ref 9). Both of these lie within the Metropolitan Green Belt and are close to the settlements of Borough Green and Platt, particularly the site adjacent to Platt Industrial Estate. The extent of the site promoted at the Celcon Works overlaps land safeguarded for the Borough Green and Platt By-pass, which is an adopted scheme of the Highway Authority and identified in the Council's adopted Development Land Allocations DPD. According to the assessment criteria in the Minerals DPD, this policy designation is a 'showstopper' for this site. In addition, there are concerns over the impact on the open setting of Borough Green and Platt of these large scale proposals and the resultant impact this would have on the residential amenity of the local communities. Given the scale of existing minerals operations in the local area, there are serious concerns over the cumulative impacts of additional sites on the highway network, pedestrian safety, the integrity of houses and other buildings along the main routes that would be used by HGVs, and the general amenity and quality of life of Borough Green and Platt by residents.

- 1.4.16 In addition to sites in the borough, there is also concern about two particular sites just across the border in Tunbridge Wells, namely Woodfalls Farm, Gravelly Ways, Laddingford (site ref 4) and land north and south of Hammer Dyke (site ref 49). The concerns focus on the potentially harmful impacts on: the ecology of the area (Woodfalls Farm is located adjacent to two Local Wildlife Sites); access and enjoyment of the countryside (there is a network of public rights of way through the land north and south of Hammer Dyke); and the local highway network and its capacity and durability to carry and withstand regular HGV movements.
- 1.4.17 The assessment criteria in the Options DPD should be corrected and supplemented by these planning considerations highlighted by the Borough Council that reflect serious concerns about the particular sites identified. These matters relating to the promoted sites as set out in Annex B should be taken fully into account during the assessment process. It is also important that the decision-making on the minerals sites takes into account the views of affected local communities, including parish councils.

## **1.5 Consultation Matters - Waste Sites Development Plan Document (DPD)**

- 1.5.1 The purpose and format of the Waste Sites DPD is the same as the Minerals DPD whilst the assessment criteria are almost identical.

### **Waste Sites Assessment Criteria**

- 1.5.2 **Proposed Response** – The Council’s comments on the assessment criteria for the Minerals Sites DPD are equally applicable to the Waste Sites DPD (Please see above).

### **Waste Sites**

- 1.5.3 Annex C sets out all of the waste sites received by KCC during the ‘Call for Sites’ exercise which fall within Tonbridge and Malling Borough.
- 1.5.4 Annex D sets out a table of information supplied by officers to KCC outlining important planning information eg existing permissions and Local Development Framework and/or Saved Policy constraints.
- 1.5.5 **Proposed Response** - There are several waste sites promoted in and adjoining the Borough of Tonbridge and Malling. These are clustered in the north-west rural area and along the border of the borough with Tunbridge Wells and Maidstone. As a result, it is important that the cumulative impacts of these sites is assessed and documented at the next stage (Preferred Options) in the plan-making process.
- 1.5.6 In light of the Spatial Vision and indicated preferred options in the Core Strategy, the waste management and treatment sites promoted in the borough should all be critically reviewed. The Core Strategy indicates that north and mid-Kent are relatively well served by facilities for transfer, treatment and recovery of MSW (most notably with the EfW facility at Allington and the composting plant at Blaise

Farm), but east Kent is less well served. The Spatial Vision aims to achieve a balanced and accessible network of facilities across Kent by plugging gaps in current provision, especially in east Kent. This means that EfW sites 13 (Allington - expansion), 55 (Ightham Sandpit Gasification Plant), 61 (SCA Packaging, New Hythe, Aylesford – Integrated Waste Management Plant) and composting sites 23 (Blaise Farm – renewable energy electricity generation installation) and 13 (Allington Waste Management Facility) are potentially in conflict with that overall objective. Consequently they should be reviewed in that context. However, other local and site specific planning considerations, that may lend some support to individual proposals, must also be taken into account, together with a detailed examination of any contribution to evolving local sustainable waste strategies. Therefore, further detailed analysis is required, which will also need to take account of similar assessment criteria already advanced in this report in respect of potential Minerals sites (see paragraph 1.4.15)

- 1.5.7 In light of the void space in consented landfills, European and National legislation on landfill and the direction it is heading, and the encouragement of the treatment of C&I waste in the Core Strategy (especially in east Kent), the inert infill sites promoted in the borough should be rejected. KCC has indicated that, for the aforementioned reasons, there is no justification for identifying land for possible use for non-hazardous waste landfill. This means that sites 17 (Moat Farm, Five Oak Green), 24 (Land North of Addington), 50 (Ightham Sand Pit) and 70 (Stonecastle Farm Quarry Lake, Five-Oak Green) should not be carried forward to the Policy Directions stage because their allocation would be contrary to the overarching strategy for waste planning in Kent.
- 1.5.8 The assessment criteria in the Options DPD should be corrected and supplemented by the criteria suggested above in respect of Minerals sites and that the planning matters relating to the promoted sites as set out in Annex D are taken into account during the assessment process.
- 1.5.9 The Council considers it is important that the decision-making on the waste sites takes into account the views of affected local communities, including parish councils.

## **1.6 Legal Implications**

- 1.6.1 Producing the Minerals and Waste Development Framework is a statutory requirement. Once KCC formally adopts the suite of Development Plan Documents (DPDs), the allocations in the M & W DPDs will need to feature on the Council's Local Development Framework Proposals Map, for information.

## **1.7 Financial and Value for Money Considerations**

- 1.7.1 At this stage in the consultation process on the MWDF there are no financial or value for money considerations.

## **1.8 Risk Assessment**

1.8.1 The consultation is an opportunity for the Council to help shape the decision-making for the Core Strategy Pre-Submission document and the Policy Directions (Preferred Options) for the Waste and Minerals Sites DPDs. If a representation is not made at this stage, there is the risk that the concerns and priorities of this Council and the potential impact on local communities will not be fully considered during the preparation of the next stage in the plan-making process for the MWDF.

## 1.9 Equality Impact Assessment

1.9.1 See 'Screening for equality impacts' table at end of report

## 1.10 Policy Considerations

1.10.1 No policy considerations.

## 1.11 Recommendations

1.11.1 The views on Kent County Council's MWDF Core Strategy (Strategy and Policy Directions Consultation (May 2011)), Minerals Sites DPD (Options Consultation (May 2011)) and Waste Sites DPD (Options Consultation (May 2011)) as set out in this report be transmitted to Kent County Council in response to its consultation.

The Director of Planning, Transport & Leisure confirms that the proposals contained in the recommendation(s), if approved, will fall within the Council's Budget and Policy Framework.

Background papers:

contact: Nigel De Wit

Minerals and Waste Core Strategy – Strategy and Policy Directions Consultation (May 2011)  
 Waste Sites Development Plan Document – Options Consultation (May 2011)  
 Mineral Sites Development Plan Document – Options Consultation (May 2011)

Steve Humphrey  
 Director of Planning, Transport & Leisure

<b>Screening for equality impacts:</b>		
<b>Question</b>	<b>Answer</b>	<b>Explanation of impacts</b>
a. Does the decision being made or recommended through this paper have potential to cause adverse impact or discriminate against different groups in the community?	No	

<b>Screening for equality impacts:</b>		
<b>Question</b>	<b>Answer</b>	<b>Explanation of impacts</b>
b. Does the decision being made or recommended through this paper make a positive contribution to promoting equality?	No	
c. What steps are you taking to mitigate, reduce, avoid or minimise the impacts identified above?		

*In submitting this report, the Chief Officer doing so is confirming that they have given due regard to the equality impacts of the decision being considered, as noted in the table above.*