

Sevenoaks Town Council's response to Kent County Council's Proposed Main Modifications to the Kent Minerals and Waste Local Plan 2024-39 – as approved by the Planning & Environment Committee on 18th October 2024

The proposed changes to the Kent Minerals and Waste Local Plan (KMWLP) are mostly technical, partly in response to changes in the National Planning Policy Framework (NPPF), and changes in terminology, such as from Areas of Outstanding Natural Beauty (AONBs) to 'National Landscapes'. Sevenoaks Town Council has no comment on these changes.

However some of the changes affect the balance between priorities for quarrying versus protection of nature, and the achievement of national objectives for waste management.

As the plan spells out:

"Government introduced legal requirements (before the last election) to drive waste up the hierarchy including the following:

- *plans must be in place detailing measures to ensure 65 per cent of municipal waste, including household waste and household like waste from commercial and industrial sources, is recycled by 2035*
- *the volume of residual waste per person which is not reused or recycled must be halved by 2042 from 2019 levels*
- *by 2050, avoidable waste must be eliminated by recycling or reusing any waste which possibly can be reused or recycled."*

It is not clear how Kent will meet these nationally set objectives.

Modification MM4 sets out the objectives for waste management operations as a recycling rate of 50% (minimum) and a landfill target of 2% (maximum). No clear indication is given on the role of Energy from Waste, which has helped Kent minimise landfill waste streams, but without forcing up genuine recycling. To hit national recycling requirements it would seem necessary to set objectives for local recycling operations above the current 50%, and to move it in the direction of 65% within five years. A clear policy on Energy from Waste is also needed because this is now the most polluting, and greenhouse gas intensive, of all forms of UK electricity generation.

Modification MM24 covers recycling of Construction, Demolition and Excavation Waste (CDEW). The high rates of recycling achieved are very welcome, as they reduce the need for primary quarrying. However, the policy suggests that Ash from Energy from Waste incineration is likely to increase as a stream within CDEW. This would be regrettable as Energy from Waste (EfW) generates toxic pollution from burning plastic, as well as high levels of greenhouse gases.

Modification MM35 outlines future approaches to waste hierarchy. It aims to increase recycling, as well as reduction and reuse of waste. But it omits any mention of Energy from Waste. There should be a target to limit, and then reduce conversion of waste to CO2 through EfW.

Modification MM38 changes the criteria and wording for allowing permitted quarrying from schemes 'which do not give rise to significant adverse impacts on nature' to schemes 'which do not give rise to unacceptable adverse impacts'. It is not clear whether this is a weakening of the protection of nature - but a change from 'significant' to 'unacceptable' would appear to create room for more projects to be permitted.

Modification MM48 appears to reframe the criteria for avoiding damage to landscape sites of International, National and Local importance. Under the new rules there appears to be additional scope for 'compensating' the impact of quarrying schemes where 'there is no alternative'. This is potentially dangerous in a countryside where nature is depleted - and the scope for genuine 'compensation' for major projects is very limited.

Finally, Sevenoaks Town Council recommends that Kent County Council (KCC) introduce measures to ensure that the Districts who are delivering waste to them for disposal are doing so while meeting both KCC's and the government's requirements.