

Kent Minerals and Waste Authority Monitoring Report (AMR)

1st April 2022
to 1st March
2023



Kent Minerals and
Waste Local Plan

December 2023

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Abbreviations

AA	Appropriate Assessment
AMR	Authority Monitoring Report (previously referred to as Annual Monitoring Report)
APCr	Air Pollution Control residues
AONB	Area of Outstanding Natural Beauty
BEIS	Department for Business, Energy and Industrial Strategy
C, D&E	Construction, Demolition and Excavation (waste materials arising from this sector)
C&D (Recycling)	Construction & Demolition (Recycling)
C&I	Commercial and Industrial (waste materials arising from this sector)
DEFRA	Department for Environment, Food and Rural Affairs
DLUHC	Department for Levelling Up, Housing and Communities
DTA	Detailed Technical Assessment
EA	Environment Agency
EfW	Energy from Waste (combustion of waste to produce electricity (and heat) by driving a steam turbine, or use of a fuel (syngas) created in gasification or pyrolysis)
EIA	Environmental Impact Assessment
EPR	Early Partial Review
EU	European Union
HRA	Habitat Regulations Assessment
HWRC	Household Waste Recycling Centre
KCC	Kent County Council
KMWLP	Kent Minerals and Waste Local Plan
KJMWMS	Kent Joint Municipal Waste Management Strategy
KWP	Kent Waste Partnership
LAA	Local Aggregate Assessment
LAARate/APR	Local Aggregate Assessment or \Rate Annual Provisional Rate
LACW	Local Authority Collected Waste (mainly that collected from households)
LEP	Local Enterprise Partnership

LNP	Local Nature Partnership
LNR	Local Nature Reserve
LPA	Local Planning Authority
LLW	Low Level Radioactive Waste
MMO	Marine Management Organisation
Mt	Million Tonnes
Mtpa	Million Tonnes Per Annum i.e., Million Tonnes Per Year
MLP	Minerals Local Plan
MPA	Minerals Planning Authority
MRF	Material Recycling Facility
MSW	Municipal Solid Waste
MWDF	Minerals and Waste Development Framework
MWDS	Minerals and Waste Development Scheme
NDA	Nuclear Decommissioning Authority
NPPF	National Planning Policy Framework
NPPW	National Planning Policy for Waste
NNR	National Nature Reserve
NPPG	National Planning Practice Guidance
ONS	Office of National Statistics
PROW	Public Rights of Way
RSPB	Royal Society for the Protection of Birds
SA	Sustainability Appraisal
SEEAWP	South East England Aggregate Working Party
SEWPAG	South East Waste Planning Advisory Group
SPA	Special Protection Area
tpa	Tonnes Per Annum i.e., tonnes per year
UK	United Kingdom
VLLW	Very Low Level Radioactive Waste
WNA	Waste Needs Assessment

WCA	Waste Collection Authority
WDA	Waste Disposal Authority
WDI	Waste Data Interrogator
WPA	Waste Planning Authority

Executive Summary

This Kent Authority Monitoring Report (AMR) covers the financial period 1st April 2022 to the 31st March 2023. This period includes the second public Regulation 18 consultations on the statutorily required 5th year review of the Kent Minerals and Waste Local Plan 2013-2030 (KMWLP). This review work recognised that whilst most of the Plan was still sound, a number of revisions were required to reflect changes in policy since the Plan's adoption in 2016. These included changes to address matters of:

- compliance with updates to the NPPF (2018, 2019, 2021 and 2023),
- adaptation to and mitigation of climate change and low carbon growth,
- low-level radioactive waste management,
- achieving a more circular economy where waste is prevented or reused,
- aggregate supply (Policy CSM 2),
- deletion of a strategic waste site (Policy CSW 5)
- deletion of references (para. 6.3.3) to further management of London's residue non-hazardous waste); and
- a 15-year plan period horizon of 2024-2039.

Given the date in drafting this AMR and the current work in reviewing the Local Plan, this AMR also reports on the results of public consultation on draft changes to the KMWLP proposed in light of the review up to the second Regulation 18 consultation.

The Authority Monitoring Report (AMR) also addresses the following using the best available data:

- The progress of adoption of minerals and waste planning policy in Kent, against the latest Minerals and Waste Development Scheme (MWDS) timetable, up to the end of March 2023;
- Progress against targets related to minerals supply and waste management as set out in the KMWLP using indicator data for Kent; and;
- A summary of the co-operation on plan making activities with other local authorities and prescribed bodies, up to the end of March 2023.

The Key Mineral Findings

Aggregates

Aggregates supply and demand is monitored in detail in the annual Local Aggregates Assessment (LAA). Key messages from the LAA that monitored the period for 2022 are as follows:

The total aggregate mineral sales in Kent during 2022 from all sources (primary and secondary) amounted to some 6.54mt; a slight decrease from 6.79mt in 2021 and an appreciable increase

from the 6.07mt recorded in 2020.

Soft sand reserves as of the end of 2022 have been subjected to further extraction and are now 5.574mt. The over 6.0mt of reserves using 2020 data was found to be an over estimation at that time and the latest landbank figure now stands at 11.73 years. The 'Aggregate Provision Rate' (APR)¹ for soft sand has slightly increased (0.475mtpa) and this will require further reserves as anticipated by the allocation of 3.2mt at Chapel Farm, Lenham in the adopted Kent Mineral Sites Plan (MSP), in order to maintain a steady and adequate level of supply over the anticipated emerging KMWLP period (to 2039). Though a 7-year landbank is estimated to cease in 2036 there would still be reserves available in 2039 for the extraction industry to exploit. This, together with anticipated 'windfall' resources of at least 0.84mt from development allocations in local plans, and the requisite statutory plan reviews every five years (in 2029 and 2034), mitigates against the necessity of seeking to allocate further soft sand allocations in the Kent Mineral Sites Plan at this time.

Landwon sharp sand and gravels remain a depleting resource in Kent. The persistently low APR rate of 0.176mtpa continues to have the effect of apparently maintaining a landbank in the region of 12+ years (now 12.67 and 12.71 in 2021). However, as existing sites 'go offline', supply to meet demand appears to be increasingly met by importation, including by road, that is not captured by annual surveys and so the landbank does not truly represent consumption in Kent. Productive capacity in 2022 remains at 0.75 million tonnes per annum (mtpa) as it was in 2021, lower than the recorded 0.85mtpa in 2020, and the 1.150mtpa in 2018 (unrecorded in 2019). This reflects the declining importance of this sector in maintaining overall supply. Site allocations in the MSP amount to 2.50mt which will, if permitted, make a significant contribution to meeting demand to 2039, with a projected surplus. However, this is considered to be unlikely, given the apparent shift towards importation, mainly from marine resources.

Landwon crushed rock was previously a matter that remained confidential in terms of sales and available reserves; however, the operator has waived confidentiality to ensure that the matter of hard rock supply over the remainder of the adopted Plan period can be fully considered during the review of the KMWLP. The operator had undertaken a re-evaluation of available reserves in 2021 and the resulting landbank, as of the end of 2022 was 14.85mt. Closer examination of the recorded sales between 2017 and 2022 demonstrated a greater than previously reported rate of extraction. The APR for crushed rock has therefore been revised to use the 6-year sales average of 1.24mtpa. This draw down rate will be insufficient over the anticipated Plan period to 2039. Either further allocations in the Mineral Sites Plan or greater importation will be required to maintain a steady and adequate supply of this aggregate type.

Importation of marine won sand and gravels remains an essential part of overall supply; the 2019 fall off in sales was reversed in 2020 and 2021 and in 2022 sales increased back towards historic levels of between 2.0-1.5mt with 1.904mt of recorded sales. Overall productive capacity has increased from 6.34mtpa to 8.21mtpa.

Sales of aggregates **imported to rail depots** continue to remain relatively insignificant in overall supply terms. The **hard rock** rail imports fell in 2021 to below 0.5mtpa, at 0.441mt, and again in 2022 to 0.362mt. However, **hard rock** importation via **wharves** is showing an increasing trend (the 10-year sales average is increasing) though in 2022 it reduced to 1.48mt from an exceptional high of 1.77mt in 2021. **Soft sand** rail sales in 2022 rose to 7,162 tonnes from 2,890 tonnes in 2021, though in overall supply, rail importation of this aggregate can be considered as negligible. **Sharp sands and gravel** rail importation similarly fell from 21,747 tonnes in 2021 to just 725 tonnes in 2022. The 10-year average is some 31,000 tonnes, therefore further monitoring will establish if the 2022 figure is an outlier or an indication of a change in the way the

¹ 'Aggregate Provision Rate' (APR) is determined by a Minerals Planning Authority as the suitable value for estimating the landbank for land-won aggregates. The default APR is the ten-year average sales, but this must be informed by the three-year average sales, adopted Minerals Local Plan requirements and other factors related to demand and supply.

market is being supplied, with wharves becoming more dominant.

Overall **recycled and secondary aggregate** productive capacity remains the same. Sales fell in 2019 and recovered in 2020. They increased in 2021 to almost 1.0mtpa and receded to 0.802mt in 2022. The 10-year sales average is however showing an increasing trend. Data for this sector has been affected by poor survey returns, and supply is considered to have a greater productive capacity than that reported. On this basis, a value for 2022 of 1.834mtpa has been assumed, which is less than a theoretical maximum value of 4.0mtpa.

Brickearth

Discussions with the operator in 2020-21 led to a more 'fine-tuned' understanding of the extraction rate that can reasonably be anticipated over the remaining adopted Plan period. This suggests that available permitted reserves of Brickearth, as of the end of 2022, will last somewhere between 22 and 29 years. This meets the KMWLP requirements of ensuring at least 25 years of permitted reserves are available.

Silica Sand

Kent has two operational silica sand sites, if taken together they meet the KMWLP (and NPPF) requirement of maintaining a stock of at least 10 years of permitted reserves. In 2022 the stock was confirmed to be over 25 years.

Tile clay

Tile clay reserves are in excess of 25 years and meet the NPPF requirements.

Chalk for cement

Reserves for cement manufacture in Kent are entirely contained at the permitted, though undeveloped, safeguarded strategic site at Holborough Cement Works. This meets the NPPF requirement for reserves equal to 25 years of supply to be maintained where substantial new investment in a kiln is required.

Other Chalk

Kent's chalk reserves for agriculture and engineering purposes are not required to meet any prescribed landbank. As previously reported, based on data for chalk reserves and sales in the period 2011- 2014 it was estimated that the permitted reserves dropped to 1.16mt. This gave an indicative permitted landbank of 16.5 years of chalk reserves. Due to poor participation with survey requests, reserves in 2022 can only be estimated. Reserves were estimated as 0.496mt, with an annual estimated extraction rate of only 6,000 tonnes, giving a landbank of over 82 years. At present there appears to be sufficient reserves to meet the market demand in Kent into the foreseeable future. Further monitoring will demonstrate if there is a need to identify further chalk reserves over the remainder of the adopted Plan period, but at present this appears unlikely.

The Key Waste Findings

The recorded arisings of **LACW** in 2022 from the WDI dataset fell by 10.2% to just under 668,104 tonnes compared to 678,893 tonnes in 2021. The 2018/19 available data showed a negative rate of growth of minus 3.5%. This 10% reduction in LACW arisings in 2022 may be an exceptional event and will be a matter to be considered against future monitoring and AMR reports. There is an expectation that arisings will increasingly decouple from population growth, and whilst arisings of **LACW** were predicted to continue to grow over the Plan period, it was

expected to be at a reduced rate. It was forecast that arisings will grow at a rate of 0.2% per annum to stand at around 740,000 tonnes in 2030/31 in the most recent WNA (waste needs assessments). The fall of 10.2% in 2022 (it was 2.4% as reported in the 2020/21 AMR and 3.5% in 2019/20 AMR) suggests the rate of growth applied in this assessment ought to be less than that indicated. However, it should be noted that the varying distribution of arisings across the county brings increased pressure on existing infrastructure in particular parts, and it is these which the Waste Disposal Authority (WDA) is seeking to address.

The **LACW** management profile data for 2022/23 collected by the Waste Disposal Authority provisionally indicates that the waste recycling targets included in the Early Partial Review for the year of 2025/26 (55%) may fall short, given the 39% recycling/composting rate in the 2022/2023 data period. Some 44% recycling/composting was achieved in 2021/2022, therefore there has been a 5% reduction on the previous year. However, the EfW rate has significantly increased by some 8% in 2022/23. This may offset, to some degree, the reduction in recycling/composting, though there are indications that food waste is also falling as a proportion of the total LACW stream. This will have an effect of reducing the compostable proportion of the total collected wastes. In terms of the landfilling target of no more than 2% in 2020/21, this has been surpassed with just 0.17% to landfill in 2022/23. Future monitoring will demonstrate if the reduced recycling/composting rate is a continuing trend that requires policy intervention.

According to the 2022 Environment Agency's WDI, some 4.93 million tonnes of waste (all types) were reported as being managed at Kent waste management facilities in 2022 (the more recent **LACW** data from the County Council's own records are for 2022/23). This compares with around 1.493 million tonnes of Kent's waste that is managed outside the county. This export is more than Kent's imports (1.682mt). Therefore, in terms of a simple balance, Kent is just under net self-sufficiency. However, of the imports, just over 845,000 tonnes came from London, of which circa 40,000 tonnes went to EfW, and around 18,000 tonnes to non-inert landfill² with circa 159,900 tonnes to non-hazardous landfill.

Over the monitoring period there were 2 planning applications that increased available capacity to manage waste. These developments contribute towards a continued shift towards a more sustainable waste management profile.

Kent Minerals and Waste Local Plans

Changes to the KMWLP resulting from the **Early Partial Review** (EPR) were adopted in September 2020. The updates focused on:

- The waste recovery capacity requirements specified in Policies CSW 7 and CSW 8 and deletion of the need for the allocation of specific sites for the disposal of dredgings and for asbestos. These updates mean that production of a separate Waste Sites Plan is no longer justified; and,
- changes to the waste and mineral safeguarding policies made to remove ambiguity in some exemption criteria relating to allocations, and proposals on sites allocated, in Borough and District Local Plans in Kent.

The **Kent Mineral Sites Plan** (MSP) was also progressed to adoption in September 2020 resulting in the allocation of one soft sand site (Chapel Farm, Lenham) and two sharp sand and gravel sites (Moat Farm and Stonecastle Farm in the Tonbridge area).

An **updated Safeguarding Supplementary Planning Document** setting out details of the KMWLP's approach to safeguarding mineral resources and minerals and waste infrastructure was adopted on 18 March 2021.

² It should be noted that the non hazardous waste capacity assessment underpinning the Early Partial Review of the KMWLP projected c55,000tpa of residual non hazardous waste from London which is close to the c50,000 tonnes reported for 2019.

An **updated Statement of Community Involvement**, that sets out how the Council will consult on planning policy and planning applications concerning waste management and minerals supply, was adopted on 18 March 2021.

In the summer of 2021, the Plan reached its fifth year as Kent's adopted strategic and development management policy plan for waste and minerals in the county and so a formal review was commenced. The review recommended that a number of policies, and/or their supporting text, be updated to reflect changes in national and local policy that had arisen since 2016. Updates to the Vision and Strategic Objectives were also recommended. In light of the review, draft updates to the Vision, Strategic Objectives and Policies (and supporting text) were prepared and consulted on between December 2021 and February 2022. Further Regulation 18 public consultations were undertaken in October to November 2022 and June to July 2023 which responded to earlier representation. The timetable for updating the Kent Minerals and Waste Local Plan was updated in September 2022, and further amended in November 2023 and can be found in the Kent Minerals and Waste Development Scheme.

Introduction

1.1 The Kent Minerals and Waste Authority Monitoring Report

The Monitoring of Local Plans is a statutory requirement of all Local Planning Authorities (LPA) (including Minerals and Waste Planning Authorities). The National Planning Policy Framework (NPPF³) requires each LPA to ensure that its Local Plan is based on adequate, up-to-date and relevant evidence regarding the economic, social and environmental characteristics and prospects of the area, while taking into account the relevant market signals.

The Kent Authority Monitoring Reports (AMRs) document the progress made in preparing, reviewing and updating Kent's Minerals and Waste Local Plans against the timetable set out in the Kent Minerals and Waste Development Scheme (MWDS) and monitors their adoption and implementation. The AMR is also used to help identify where changes to policies may be needed. Historically, this monitoring document has been referred to as the Kent Minerals and Waste Annual Monitoring Report. Following recent legislative changes, the document is now referred to as the Kent Minerals and Waste Authority Monitoring Report.

This Kent AMR covers the financial year 2022/2023 (i.e., 1 April 2022 to 31 March 2023) and reports on various matters using best available data including the following:

- The progress made with updates to minerals and waste planning policy in Kent and associated documentation;
- Progress against targets related to minerals supply and waste management as set out in the KMWLP using indicator data for Kent; and
- A summary of co-operation on plan making activities with other local authorities and prescribed bodies.

This AMR covers the period to support the Review of the Kent Minerals and Waste Local Plan work in 2021 and 2022 and to assist those responding to the Regulation 18 consultations in 2022 and 2023. The outcome of the KMWLP Full Review Further Modifications Regulation 18 consultation conducted in the Summer of 2023 will be fully reported in AMR 2023-24.

Given the date in drafting this AMR and the current work in reviewing the Local Plan, this AMR also reports on the results of public consultation on draft changes to the KMWLP proposed in response to the second Regulation 18 consultation.

In accordance with Regulation 35 (1.) of the Town and Country Planning (Local Planning) (England) Regulations 2012⁴, this and previous AMRs are available to view online⁵, and in hard copies, which are available for inspection during normal office hours by appointment with the Minerals and Waste Planning Policy Team.

1.2 Kent Contextual Overview

1.2 Population

The Kent and Medway Growth and Infrastructure Framework (GIF)⁶ provides population and

³ NPPF (2023) Section 3. Plan-making, para. 33 Preparing and reviewing plans, page 11

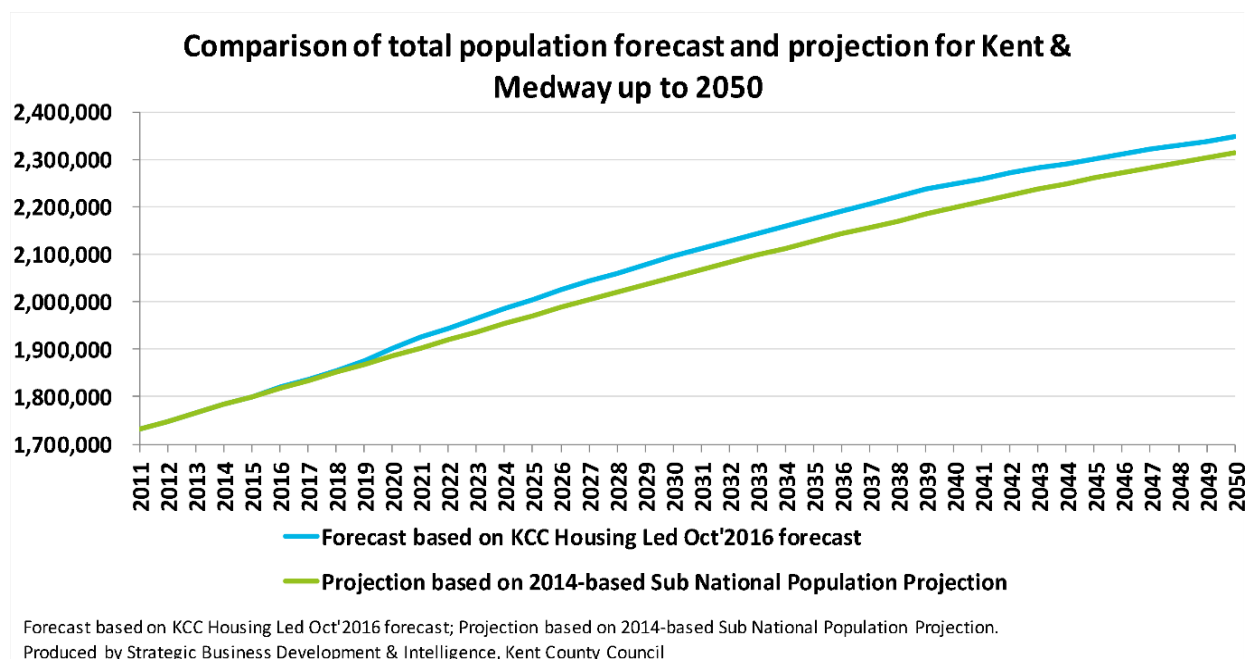
⁴ <https://www.legislation.gov.uk/uksi/2012/767/regulation/35>

⁵ <https://www.kent.gov.uk/about-the-council/strategies-and-policies/environment-waste-and-planning-policies/planning-policies/minerals-and-waste-planning-policy#tab-4>

⁶ <https://www.kent.gov.uk/about-the-council/strategies-and-policies/environment-waste-and-planning-policies/growth-and-infrastructure-framework-gif>

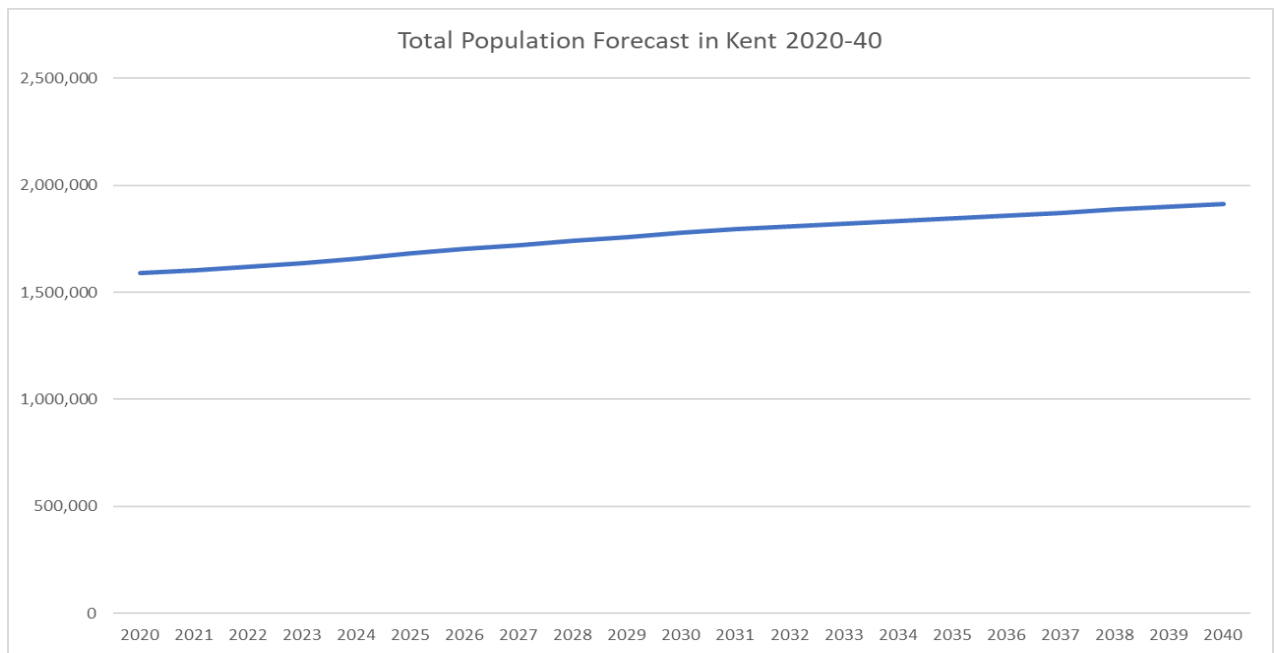
housing projections between 2011 and 2031 for Kent and Medway. In 2011 the population of Kent and Medway was 1,731,400, and it was anticipated that the area would experience 23% growth by 2031, resulting in a population of 2,127,600. Figure 1 below shows the degree of variance between a projection based on the County Council’s housing lead projection (2016 forecast) and that of the slightly lower Sub-National Population Projection which is based on 2014 data. The GIF has not been updated as of 2019. More recent work by the Office of National Statistics (ONS) in 2021⁷ projects Kent’s population (excluding Medway) to be 1,688,100 by 2028 which appears to be in alignment with the GIF projection for 2031. Figure 1 below is taken from the GIF and projects population to 2050.

Figure 1: Kent and Medway Population Forecast up to 2050



The more recent Kent County Council (KCC) housing led forecasts of 2021, were based on data that was available up to March 2021, as provided by ONS data (up to mid-year 2020). This work forecasts population from 2020 to 2040, essentially covering the span of the anticipated Full Review of the KMWLP. It forecasts the Kent population (excluding Medway) to be 1,913,100 by 2040. Figure 2 overleaf demonstrates the projected Kent population over the period to 2040. The projections are based on the most recently available mid-year population estimates and a set of underlying demographic assumptions regarding future fertility, mortality, and migration. For the 2022-23 AMR reporting period the demographic data pertaining to population changes and housing trajectories have not been updated since the 2021 forecast data. When becomes available this will be reported in the next AMR report, however it is not anticipated that the population changes will fundamentally alter Kent’s demographic characteristics.

⁷ 2018-Based Subnational Population Projections Strategic Commissioning Statistical Bulletin July 2020; The bulletin presents the 2018-based Subnational Population Projections for Kent as published by the ONS 24 March 2020

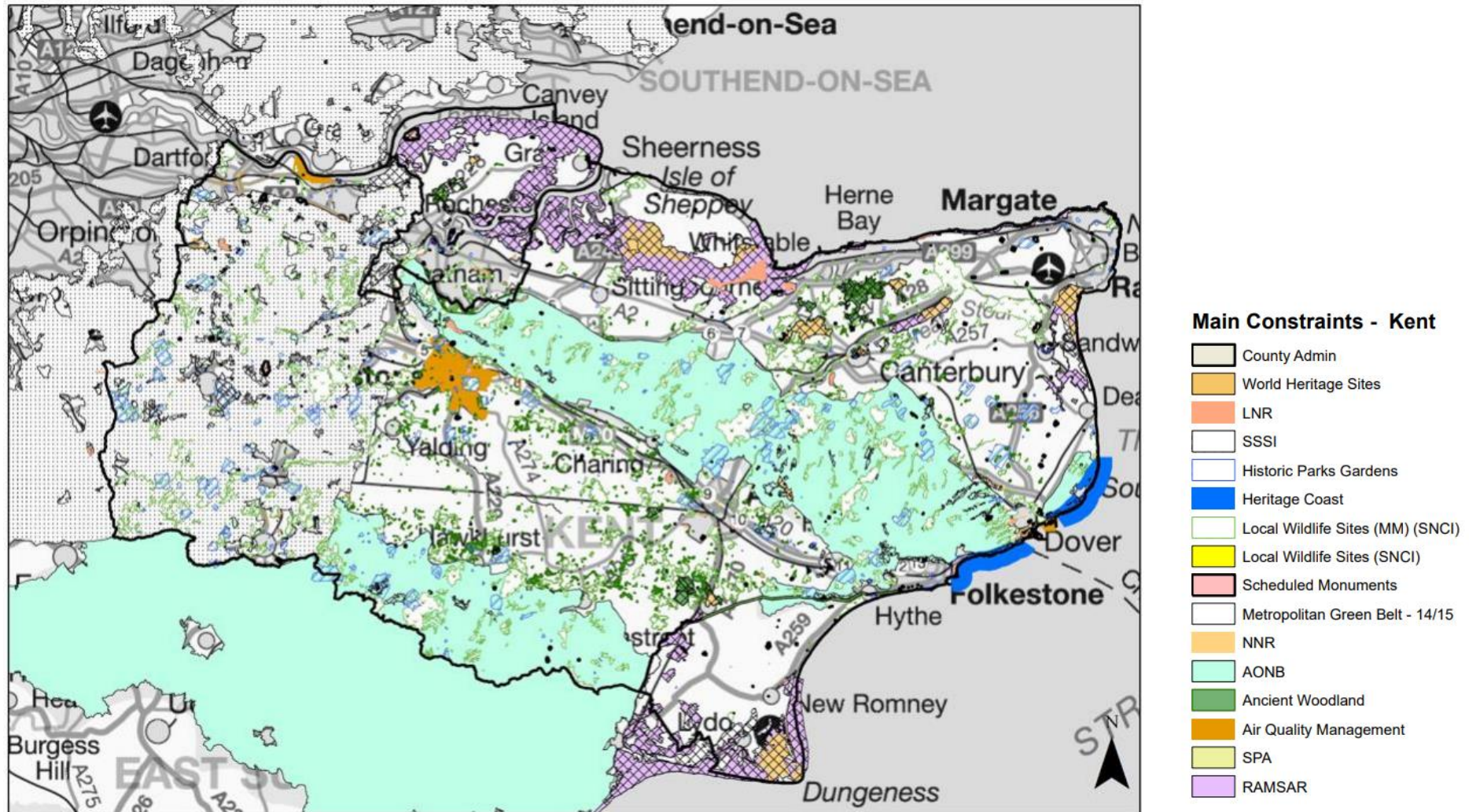
Figure 2: Kent and Medway Population Forecast up to 2040

1.2.2 Environment

The County of Kent is subject to a number of planning and environmental constraints, with some 20% of its area covered by sites that are internationally or nationally important for their nature conservation value, and one third of its area covered by the Kent Downs or High Weald Areas of Outstanding Natural Beauty (AONB). There are significant areas within coastal or fluvial flood plains. In addition, parts of the county's agricultural land are designated as being of best and most versatile agricultural quality.

Figure 3 overleaf shows the key planning and environmental constraints within Kent, including the Medway Unitary Authority and the Ebbsfleet Development Corporation areas, the list is not fully exhaustive, and the fully detailed constraint maps are to be found in the KMWLP.

Figure 3: Planning and Environmental Constraints in Kent (including the Medway Council and the Urban Development Corporation areas)



1.2.3 Economic Minerals in Kent

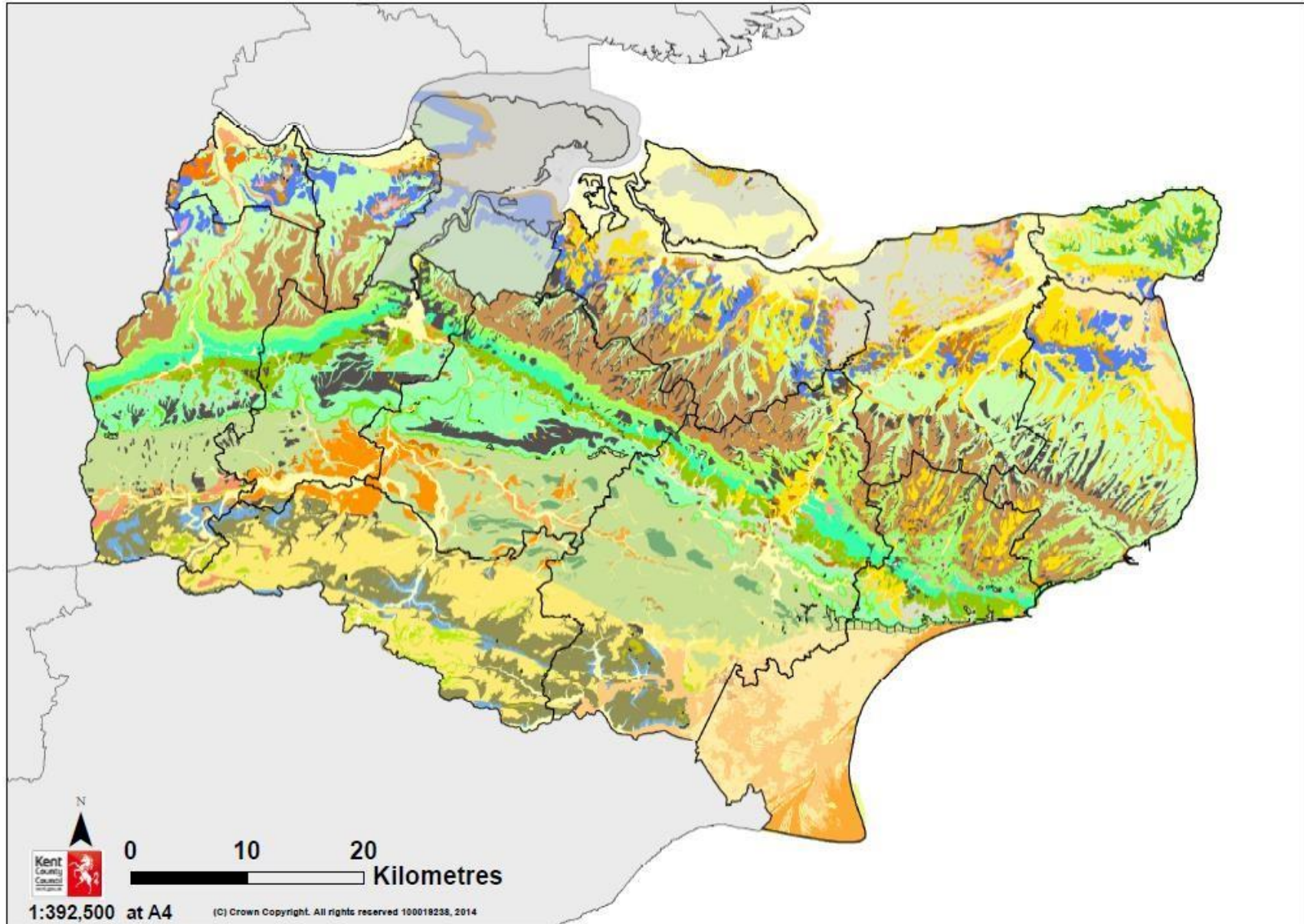
Kent is underlain by several naturally occurring minerals of economic importance including chalk (that is also referred to as 'the Chalk', given that this is its geological nomenclature as it occurs in Kent's stratigraphy), clays (of various types, but essentially similar type deposits), brickearth (a superficial windblown deposit of mainly clay minerals), 'Ragstone' (a significant geological unit of hard limestone rock), and a variety of superficial sand and gravels deposits. There is also a large scale stratigraphically defined unit of sand that gives rise to both construction aggregates (soft sand) and industrial minerals, including high purity or silica sand (the Folkestone Formation).

The construction aggregates (soft sand, sharp sand and gravels and the Ragstone once crushed) are the main types of economically important minerals extracted in Kent at this time. Although brickearth (for stock, or London Stocks, brick manufacture), clay (for tile manufacture and engineering clay) and chalk (for engineering and agricultural lime applications) are also extracted. In addition, there are a number of Wealden sandstones that have, historically, been important in construction, though this is not extensively used today. See Figure 4 for Kent's geology, and geological key overleaf.

Another potential crushed rock resource exists in East Kent, in the form of a Carboniferous Limestone deposit. This potential resource is found at considerable depth below the ground surface (approx.300m) and has not been exploited for aggregate use. The associated energy mineral, coal, was extracted until 1989. This geological unit is not a surface deposit, and its exploitation would require some form of deep mining. Since the end of the associated coal mining in 1989 it appears that any probability of extraction is low and would probably require a national, if not international market, to justify the required capital to effect its exploitation.

To compliment the indigenous landwon aggregate supplies, significant proportions of the aggregate minerals used in Kent are imported via rail and wharf facilities, with these minerals also serving markets in London and the wider south east. Moreover, the recycling or re-use of wastes, particularly from construction, demolition and excavation waste (C, D&E) arisings, makes a significant contribution to Kent's construction aggregate need. Ensuring that appropriate provision is made for landwon, imported and secondary and recycled minerals is a key objective for the County Council as the Mineral Planning Authority (MPA) to meet Kent's current and future objectively assessed needs.

Figure 4: Geology of Kent both Solid and Superficial



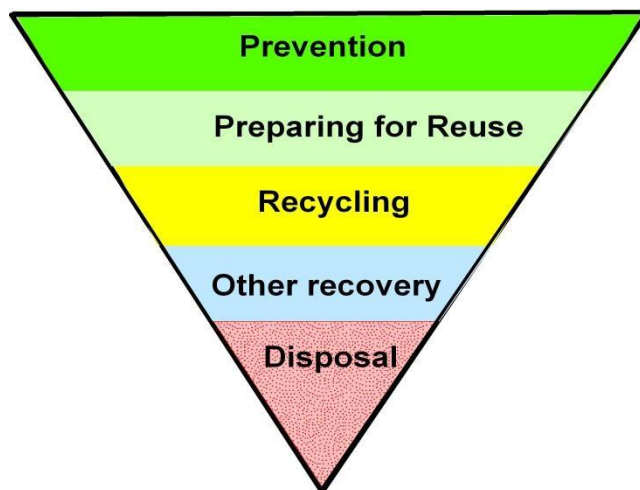
Legend: Geology of Kent

<u>Superficial (Drift) Deposits of Kent</u>	<u>Solid Geology of Kent</u>
 Landslip	 Mineral & Waste Authorities outside KCC
 Blown Sand	 Lenham Beds
 Marine Beach / Tidal Flats	 Bagshot Beds
 Stom Gravel Beach Deposits	 Claygate Beds
 Marine (Estuarine) Alluvium (Clay)	 London Clay
 Marine (Estuarine) Alluvium (Sand (Sand & Gravel))	 Blackheath / Oldhaven Beds
 Calcareous Tufa	 Woolwich Beds
 Alluvium	 Thanet Beds
 Dry Valley & Nailbourne Deposits	 Bullhead Bed
 Peat	 Upper Chalk
 Brickearth	 Middle Chalk
 Undivided Flood Plain Gravel	 Melbourne Rock
 1st Terrace River Gravel	 Lower Chalk (Glaucconitic Marl)
 2nd Terrace River Gravel	 Upper Greensand
 3rd Terrace River Gravel	 Gault Clay
 4th Terrace River Gravel	 Lower Greensand
 5th Terrace River Gravel	 Folkestone Beds
 1st/2nd Terrace River Gravel	 Sandgate Beds
 2nd/3rd Terrace River Gravel	 Hythe Beds
 4th/5th Terrace River Gravel	 Atherfield Clay
 Taplow Gravel	 Weald Clay
 Boyn Hill Gravel	 Sand in Weald Clay (/Sandstone)
 Head	 Large 'Paludina' Limestone
 Coombe Deposits	 Small 'Paludina' Limestone
 Head Brickearth	 'Cyrene' Limestone
 Head Brickearth (Older)	 Clay Ironstone
 Head Brickearth 1st Terrace	 Undifferentiated Clay & Limestone
 Head Gravel	 Hastings Beds
 Plateau Gravel	 Upper Tunbridge Wells Sand
 Clay-with-Flints	 Upper
 Sand in Clay-with-Flints	 Cuxfield Stone
 Disturbed Blackheath Beds	 Lower Grinstead Clay
	 Ardingley Sandstone
	 Lower Tunbridge Wells Sand
	 Tunbridge Wells Sand
	 Clay in Tunbridge Wells Sand
	 Grinstead Clay
	 Wadhurst Clay
	 Sand in Wadhurst Clay
	 Ironstone in Wadhurst Clay
	 Ashdown Beds

1.2.4 Waste

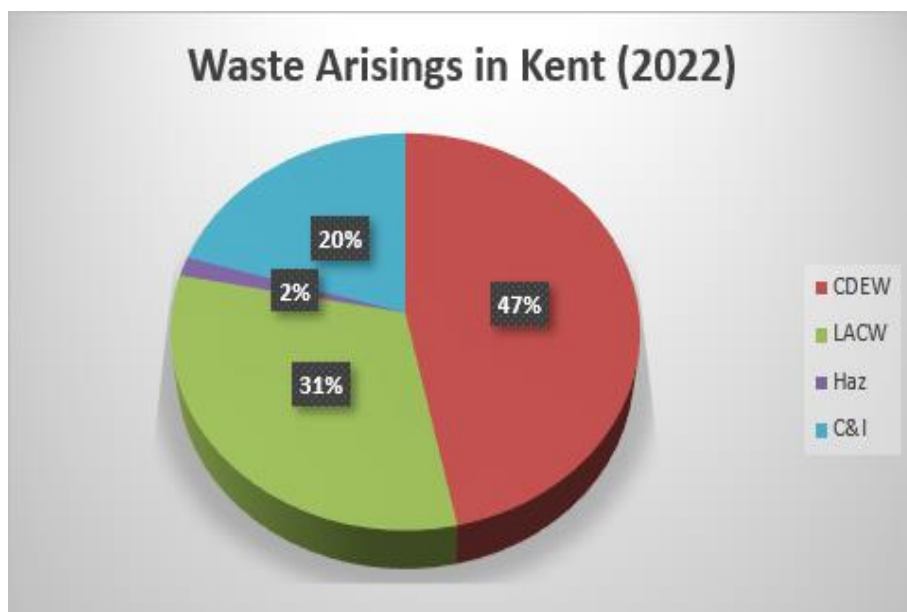
Waste arisings in Kent requires careful management and treatment in an environmentally sustainable manner. Management needs to follow national and local policy requirements including in accordance with the waste hierarchy (see Figure 5 below) and meet the objective of maintaining net self-sufficiency in waste management within Kent. Maintaining net self-sufficiency whilst moving waste up the waste hierarchy are key objectives for the County Council as the Waste Planning Authority (WPA) for Kent and is reflected in the adopted and emerging KMWLP.

Figure 5: The Waste Hierarchy



It is estimated (by the Environment Agency Waste Data Interrogator for calendar year 2022) that around 4.9million tonnes of waste requiring management was produced in Kent in 2022. The majority of this waste is generated within the Construction, Demolition and Excavation (C, D&E) waste stream, with an estimation of just over 2.3Mt. Local Authority Collected Waste which is mainly composed of household waste, represents around 31% of the overall waste produced with Commercial & Industrial waste at some 20% (1.005mt) and hazardous waste making up the difference. The County Council Waste Management Authority’s waste data is based on the financial year 2022/23 and thus has different waste proportions than the WDI records. Figure 6 below shows the 2022 Kent waste arisings (percentages).

Figure 6: Kent Waste Arisings 2022 (WDI Data)



Kent has a range of operational waste management facilities, from non-inert and inert waste landfills to recycling and composting facilities, and energy from waste (EfW) plants providing over a million tonnes of processing capacity. Import and export of waste occurs from, and to, other parts of the country, the south east and London in particular. Wastewater is treated via a network of wastewater and sewage sludge treatment facilities operated by Southern Water.

1.3 The Kent Minerals and Waste Local Plan 2013-30

Kent County Council (KCC) is responsible for waste and minerals planning in the county of Kent. As part of its responsibilities, the County Council is required to prepare planning policy for the production of minerals and management of waste. Such planning policy is set out in the Kent Minerals and Waste Local Plan 2013-30 (as amended by the Early Partial Review 2020) and Kent Mineral Sites Plan 2020.

The KMWLP 2013-30 was adopted in 2016 and set out the County Council's core strategy and policy framework for minerals and waste development in Kent. As amended by the Early Partial Review, which was adopted in 2020, it is a key policy document for the determination of planning applications and appeals in Kent. The KMWLP includes forecasts of future waste capacity and mineral supply requirements.

1.4 Early Partial Review of the Adopted KMWLP 2013-30 Adopted in 2020

As previously reported the modifications of the KMWLP resulting from the Early Partial Review addressed the following two main policy areas:

- a. Waste Management Capacity Provision
 - The provision of future waste management capacity in particular 'Other Recovery' for the management of non-hazardous residual waste; and
 - The need to identify site allocations in a Waste Sites Plan for waste management facilities to deliver the waste strategy of the adopted Plan.

The Partial Review was necessary as coincident with the time of adoption the Plan in 2016, the implementation of significant (between 500,000 to 550,000tpa⁸) permitted 'other recovery' capacity for waste meant the recovery requirements set out in policy (Policy CSW: 7, now Policy CSW: 4) had already been largely met. This initiated an immediate early review of the waste capacity requirements detailed in the Plan.

- b. Minerals and Waste Safeguarding – The approach to safeguarding mineral resources and waste management and minerals supply infrastructure.

As first reported in AMR 2018/19, in addition to there being no requirement for a Waste Sites Plan, the experience of implementing the adopted Plan policies regarding mineral and waste safeguarding had revealed ambiguity in the wording of certain of their exempting criteria which hindered their effectiveness. As has been reported in the previous AMRs, amongst other aims, the intention of these safeguarding policies is to ensure that development on sites for non-mineral or non-waste development (i.e. housing and commercial development) allocated in a Borough or District Local Plan would be exempt from the KMWLP's safeguarding policy provisions *if* the need to safeguard any mineral resource underlying the site, and/or proximate minerals and waste infrastructure, had been assessed and factored into the decision to allocate the site(s).

In practice between 2017 and 2019 there were occasions where the policies had been interpreted as to exclude *any* site allocations in adopted development plans from the safeguarding process, *regardless* of whether minerals and waste safeguarding matters were considered during the site's local plan

⁸ Kent Waste Needs Assessment 2018, Capacity Required for the Management of Residual Non-Hazardous Waste BPP Consulting; Section 3.6, page 15

allocation process. This was not the intention of the policies, nor national policy guidance. This interpretation had the potential to undermine the effectiveness of these policies, unless reviewed and modified. The Early Partial Review provided the opportunity to address both the revised waste capacity requirements and the waste and minerals safeguarding policies. Thus, ensuring that the presumption to safeguard is properly applied equally at local plan preparation as it is when dealing with planning applications.

The Early Partial Review of the KMWLP was adopted by full Council in September 2020. In 2020-21 a process of evidence gathering was initiated in order to prepare the statutory 5-year review of the KMWLP adopted in 2016. For completeness this reviewed those policies changed as a result of the Early Partial Review Plan.

1.5 The Kent Mineral and Waste Local Plan 2024-39

Current progress on the updating of the Kent Minerals and Waste Local Plan, following the required statutory 5-year review of the adopted Plan is reported in section 1.8 below.

1.6 Adopted Mineral Sites Plan 2020

Following Independent Examination into the Kent Minerals Sites Plan in October 2019, the Council subsequently adopted the Mineral Sites Plan in September 2020. The Minerals Sites Plan allocates the following three sites:

- M3: Chapel Farm (West), Lenham – Soft Sand (3.2mt)
- M13: Stonecastle Farm, Hadlow/Whetsted – Sharp Sand and Gravel (1.0mt)
- M10: Moat Farm, Five Oak Green, Capel – Sharp Sand and Gravel (1.5mt)

1.7 Progress Against the Development Scheme

The Local Development Scheme (LDS) sets out the County Council's program for preparing minerals and waste planning documents. The February 2019 LDS timetable was updated in January 2021, in November 2021 again in September 2022 and most recently in November 2023. The updated LDS now reflects progress required for the full review and update of the KMWLP 2013-30 and a separate timetable for the review of the Kent Mineral Sites Plan 2020. Details of which are set out in Tables 1 and 2 below and overleaf.

Table 1: Review and Update of Kent Minerals and Waste Local Plan 2013-30 - Timetable for Key Stages

Stages	Dates
<i>Evidence gathering to inform review</i>	<i>June 2020 – March 2021 (completed)</i>
<i>Consultation with key stakeholders on need for review of policies</i>	<i>January 2021 – May 2021 (completed)</i>
<i>Report outcome of review to Members including recommendations on the need to update policies</i>	<i>September - November 2021 (completed)</i>
<i>Consultation on draft updated policy (Regulation 18)</i>	<i>December 2021 – February 2022 (completed)</i>
<i>Consultation on draft Kent Minerals and Waste Local Plan 2023-38 (Regulation 18)</i>	<i>October 2022 – November 2022 (completed)</i>
<i>Consultation on further proposed changes to the Kent Minerals and Waste Local Plan [now spanning 2024-39]</i>	<i>June-July 2023 (completed)</i>

<i>(Regulation 18)</i>	
Publication of draft updated policy (Regulation 19) for representations on soundness	January – February 2024
Submission to Secretary of State	May 2024
Independent Examination Hearings	July 2024
Inspector's Report	November 2024
Adoption	February 2025

Table 2: Update of the Kent Mineral Sites Plan - Timetable for Key Stages

Stages	Dates
<i>Call for Sites</i>	<i>October 2022 – November 2022 (completed)</i>
Consultation on a Site Nominated for Hard Rock (Regulation 18)	June 2023- July 2023 <i>(completed)</i>
Second Call for Sites	<i>August – October 2023</i>
Publication of draft updated Minerals Sites Plan for representations on soundness (Regulation 19 Pre-submission Draft)	October 2024– November 2024)
Submission to Secretary of State	February 2025
Independent Examination Hearings	March-April 2025
Inspector's Report	August 2025
Adoption	December 2025

1.8 Kent Minerals and Waste Local Plan 2024-39 – Statutory Review

As the Kent Minerals and Waste Local Plan was adopted in 2016, a five-year review of this Plan was required to be commenced in 2021 as previously reported. As stated above, a focused 'Early Partial Review' of the Plan had already taken place and so the limited number of policies updated by the Early Partial Review Plan did not statutorily require review until 2025. However, for completeness, these policies and supporting text in the adopted 2016 Plan and the Early Partial Review Plan have been reviewed, and where necessary updated.

The five-year review process included a review of the Plan's Vision and Strategic Objectives, the strategic policies for minerals supply and waste management and the development management policies. The review included consideration of changes in national and local policy. Findings of the review were set out in a report entitled 'Kent Minerals & Waste Local Plan 2013-30 5 Year Review of 2016 adopted Plan' and were reported to the County Council's Environment & Transport Cabinet Committee on the 8th of September 2021 (see link: <https://democracy.kent.gov.uk/ieListDocuments.aspx?CId=831&MIId=8792&Ver=4>)

A red, amber, green 'traffic light' system was used to identify which of the policies required modification. This is explained in the committee report in detail. Table 3 overleaf shows a summary of the outcome of the review work that was conducted in 2021.

Table 3: Summary of Outcome of the statutory review of the adopted KMWLP policies (undertaken 2021)

Policy Number & Title	Update Required
Policy CSM 1: Sustainable development	Yes
Policy CSM 2: Supply of Land- won Minerals in Kent	Yes
Policy CSM 3: Strategic Site for Minerals	No
Policy CSM 4: Non-identified Land-won Mineral Sites	No
Policy CSM 5: Land-won Mineral Safeguarding	No
Policy CSM 6: Safeguarded Wharves and Rail Depots	No
Policy CSM 7: Safeguarded Other Mineral Plant Infrastructure	No
Policy CSM 8: Secondary and Recycled Aggregates	Yes
Policy CSM 9: Building Stone in Kent	Yes
Policy CSM 10: Oil, Gas and Unconventional Hydrocarbons	Yes
Policy CSM 11: Prospecting for Carboniferous Limestone	Yes
Policy CSM 12: Sustainable Transport of Minerals	Yes
Policy CSW 1: Sustainable Development	Yes
Policy CSW 2: Waste Hierarchy and Policy	Yes
Policy CSW 3: Waste Reduction	Yes
Policy CSW 4: Strategy for Waste Management Capacity	Yes
Policy CSW 5: Strategic Site for Waste	No
Policy CSW 6: Location of Built Waste Management Facilities	Yes
Policy CSW 7: Waste Management for Non-hazardous Waste	Yes
Policy CSW 8: Recovery Facilities for Non-Hazardous Waste	Yes
Policy CSW 9: Non inert Waste Landfill in Kent	Yes
Policy CSW 10: Development at Closed Landfill Sites	Yes
Policy CSW 11: Permanent Deposit of Inert Waste	Yes
Policy CSW 12: Identifying Sites for Hazardous Waste	Yes
Policy CSW 13: Remediation of Brownfield Land	No
Policy CSW 14: Disposal of Dredgings	Yes
Policy CSW 15: Wastewater Development	Yes
Policy CSW 16: Safeguarding of Existing Waste Management Facilities	Yes
Policy CSW 17: Nuclear Waste Treatment and Storage Dungeness	Yes
Policy CSW 18: Non-nuclear Radioactive Low-Level Waste (LLW) Management Facilities	Yes
Policy DM 1: Sustainable Design	Yes
Policy DM 2: Environmental and Landscape sites of International National and Local Importance	Yes
Policy DM 3: Ecological Impact Assessment	Yes
Policy DM 4: Green Belt	No
Policy DM 5: Heritage Assets	Yes
Policy DM 6: Historic Environment Assessment	Yes
Policy DM 7: Safeguarding Mineral Resources	No
Policy DM 8: Safeguarding Minerals Management, transportation Production & Waste Management Facilities	No
Policy DM 9: Prior Extraction of Minerals in Advance of Surface Development	Yes
Policy DM 10: Water Environment Policy DM 11: Health and Amenity Policy DM 12: Cumulative Impact	Yes

Policy DM 11: Health and Amenity	Yes
Policy DM 12: Cumulative Impact	Yes
Policy DM 13: Transportation of Minerals and Waste	Yes
Policy DM 14: Public Rights of Way	No
Policy DM 15: Safeguarding of Transportation Infrastructure	No
Policy DM 16: Information Required in Support of an application	Yes
Policy DM 17: Planning Obligations	Yes
Policy DM 18: Land Stability	Yes
Policy DM 19: Restoration, Aftercare and After-use	Yes
Policy DM 20: Ancillary Development	Yes
Policy DM 21: Incidental Mineral Extraction	No
Policy DM 22: Enforcement	Yes

A total of 183 comments were received on the proposed updates to the Kent Minerals and Waste Local Plan 2013-30 from a wide range of stakeholders including:

- Individuals;
- district and borough councils;
- parish councils;
- statutory environmental bodies;
- the waste and minerals industry; and,
- other stakeholder groups and organisations.

The responses received were generally supportive of the proposed approach, particularly in relation to the proposed changes to the Objectives and Vision, the measures to mitigate and adapt to climate change and greater measures to support biodiversity net gain. The main areas of comment were as follows:

General

- The draft refreshed Kent Minerals and Waste Local Plan did not plan for a fifteen-year period as required by the National Planning Policy Framework;

Minerals

- The existing policy allocating a strategic minerals site in the form of a cement works and associated chalk reserve at Holborough should be deleted as this is not justified, due to a lack of need for the facility, and is inconsistent with national policy including on Green Belt;
- planning permission for the allocated strategic minerals site (see above) has been implemented and so the site should be safeguarded;
- calculation of future requirements for soft sand is flawed resulting in under provision because:
 - planned housing growth not taken into account;
 - abnormal low sales years due to Brexit and Covid and demand from areas beyond Kent were not taken into account; and,
 - the site allocated in the Minerals Sites Plan for soft sand will not be developed during the Plan period.
- additional provision for crushed rock should be made as future requirements for crushed rock are higher than forecast and cannot be met from existing sites. The plan should consider that the extracted crushed rock is of differing quality and cannot all be used for 'high specification' uses
- extraction of hydrocarbons should not be allowed as it is inconsistent with the climate change agenda;

Waste

- Changes to policy encouraging development to be consistent with achieving a 'circular economy'⁹ place onerous burdens on developers which will make new development unviable;
- changes should be consistent with emerging revised Kent Waste Disposal Strategy; new sites to manage household waste should be allocated in a Waste Local Plan there is uncertainty over new regulations affecting recycling;
- clarity required regarding management of waste at Dungeness;
- management of radioactive waste at Dungeness risks impacts on human health and the environment. This policy change requires a Habitats Regulations Assessment;

Development Management

- Updated policy concerning Biodiversity Net Gain should be more ambitious (require at least 20% instead of 10%) and guidance should be provided setting out how requirements will be met;

In light of comments that the draft refreshed KMWLP was not consistent with national policy because it did not cover a 15-year period, legal advice was obtained that confirmed the need to extend the period of the Local Plan. It is now proposed that the updated Kent Minerals and Waste Local Plan 2024-2039 will in effect be a replacement plan, rather than a refreshed plan. Initially it was considered appropriate for the Plan to have a period covering 2023 to 2038 (this has been subsequently adjusted to 2024 to 2039 to reflect timescales in preparing a local plan). As a significant change to the emerging Local Plan, this required a further Regulation 18 public consultation which was undertaken between October and November 2022.

In the Spring of 2023, following consideration of the comments relating to the Local Plan period being extended, a further round of modifications to the Local Plan were proposed. These included:

- Changes to Policy CSM 2 and supporting text relating to the quantity of aggregate mineral to be planned for;
- Deletion of Policy CSW 5 that allocates land for an extension to Norwood Quarry, Isle of Sheppey for subsequent filling with hazardous flue ash; and
- Deletion of paragraph 6.3.3 (and associated sub-title) which concerns making specific provision within Kent for the management of residual non-hazardous waste by landfill or energy recovery that arises in London.

This consultation ran from 13 June to the 25 July 2023, which is outside this AMR report timeline of 31st March 2022 to 1 April 2023. The results of which will be reported in the next AMR reporting period. However, it can be reported that with regard to crushed (hard) rock supply, the Kent Minerals and Waste Local Plan expects a 'landbank' of ten years to be maintained throughout the plan period. This means a ten years supply to be provided in 2039 at the end of the anticipated plan period to be consistent with national policy requirements. Current reserves are only forecast to last until 2034 given the significant increase in extraction reported since 2017.

The 6-year sales average is considered the appropriate LAA/APR rate (at 1.240mtpa) to use so new reserves of approximately 17.4mt are required, to be identified, if possible, in the form of an allocation(s) in a revised Minerals Sites Plan.

The supply of soft sand over the anticipated extended Local Plan Period to 2039 is also a point of further consideration. Permitted reserves do not fully deplete over this period, a maintained 7-year landbank is estimated to cease in 2036. This would, ordinarily trigger the need to identify additional

⁹A circular economy is an alternative to a traditional linear economy (make, use, dispose) in which resources are kept in use for as long as possible, extract the maximum value from them whilst in use, then recover and regenerate products and materials at the end of each service life.

resources in the form of allocation(s) in a revised Mineral Sites Plan. However, it is considered that this is not necessary at this time given that there will be at least two statutory plan review cycles before the issue of supply becomes acute for this aggregate mineral. In addition, it is anticipated that 'windfall' reserves of at least 0.84mt may come forward over the extended Plan period due to identified developments in Kent's local plans at the district and borough level. Therefore, both of these factors mitigate from the need to identify additional soft sand allocations at this time.

Legislation requires that an independent 'Sustainability Appraisal' of draft planning policy is undertaken that determines the likely social, economic, and environmental effects of the policies and makes recommendations for changes. A full Sustainability Appraisal (August 2022 (ref: CO04300759)) was prepared. This report supported the last Regulation 18 public consultation conducted in Summer 2023.

1.9 Update to the Kent Mineral Sites Plan

As previously reported, preparation of the update to the Kent Mineral Sites Plan has been conducted in accordance with the timetable set out in the Kent Minerals and Waste Local Development Scheme (see above). The key stages involved in identifying potentially acceptable new site(s) are as follows:

- Call for Sites - two have been conducted, although a second was undertaken in August 2023 outside this AMR reporting period.
- Initial assessment of nominated sites.
- Consultation on Site Options (Regulation 18) which allows a short list of potential sites to be identified.
- Detailed technical assessment of site options on the short list, including Sustainability Appraisal. This assessment process identifies suitable sites for potential allocation in the updated Minerals Sites Plan.

This process follows that used to identify sites in the adopted Kent Mineral Sites Plan 2020. A Scoping Report for the Mineral Site Plan's Sustainability Appraisal forms part of the documents for public consultation.

The initial 'Call for Sites' process involved inviting landowners, operators, and other interested parties to nominate sites which they consider suitable for mineral (in this case hard rock) extraction. This was conducted between October and November 2022. This resulted in one hard (crushed) rock coming forward that would yield potentially up to 20mt of hard rock (Ragstone). Given that only one site was promoted, it was considered appropriate to conduct a second Call for Sites exercise. This was conducted in August to October 2023, outside this AMR reporting period. Detailed technical assessment is being undertaken on the submitted site and the outcome of this and the Mineral Sites Plan work will be reported in the next AMR report.

1.10 Supplementary Planning Document Safeguarding

As previously reported in March 2021, the County Council adopted a revised Supplementary Planning Document on Safeguarding. The revised document explains how the updated policies (DM 7: Safeguarding Mineral Resources and DM 8: Safeguarding Minerals Management, Transportation, Production & Waste Management Facilities) should be interpreted. It included guidance on how the process should be applied at the planning application stage and when land is proposed for allocation in a borough or district local plan where there are minerals and/or waste management safeguarding issues. A number of safeguarding assessments have since been submitted to support planning applications and local plan allocations. A representative sample of this assessments can be found at the following link <https://www.kent.gov.uk/about-the-council/strategies-and-policies/environment-waste-and-planning-policies/planning-policies/minerals-and-waste-planning-policy#tab-2> .

No further updates relating to the Supplementary Planning Document Safeguarding are

considered necessary at this time.

1.11 Statement of Community Involvement

National planning policy and legislation recognises the importance of engaging with local communities to shape the places where they live, work and play. Under the Planning and Compulsory Purchase Act 2004, the Council is required to produce a Statement of Community Involvement (SCI) which sets out how it will involve communities in its planning activities. The Council is expected to tailor its SCI to the specific needs and characteristics of the County and facilitate the involvement of all interested parties.

The Council adopted its first SCI in 2006 and, following changes to the planning process, two separate Addendum documents were published in April 2013 and January 2014. The Town and Country Planning (Local Planning) Regulations were amended to require the SCI to be reviewed at least every five years. As a result, the SCI was reviewed again, and text of a revised document was adopted in 2021.

The revised SCI sets out principles and approaches for involving the community (including those who live in, work in or visit Kent, borough, district, parish and town councils and other organisations which represent key community interests) in:

- The plan making process such as Development Plan Documents (local plans), Supplementary Planning Documents and Neighbourhood Plans, and;
- the consideration of planning applications determined by the County Council.

Plan Monitoring

2.1 Introduction

In accordance with the Localism Act 2011, it is the responsibility of each Local Planning Authority (LPA) to decide what to include in their AMRs, whilst ensuring that they are prepared in accordance with the relevant UK legislation. Note that EU legislation was retained as UK legislation when the UK formally left the European Union on the 31st January 2020.

2.2 Plan Monitoring Indicators

The County Council continues to attach importance to the former national indicators¹⁰ used as the basis for minerals and waste monitoring in previous years. In addition, KCC has developed its own 'local' indicators and continues to monitor and report on these sources of information. Table 4 below sets out the main indicators used in previous AMR documents.

Table 4: Minerals and Waste Annual Monitoring 'Indicators'

Data Indicator	Source	Former National Indicator Number
Production of Primary Land-won Aggregates	Annual Aggregates ¹¹ Monitoring Survey	Core Output Indicator 5A

¹⁰ DCLG (July 2008) National Indicators for Local Authorities and Local Authority Partnerships

¹¹ Co-ordinated and published by South East England Aggregates Working Party (SEEAWP), takes account of the Kent Local Aggregates Assessment prepared by Kent County Council

Production of Secondary/Recycled Aggregates	Annual Aggregates Monitoring Survey	Core Output Indicator 5B
New Mineral Reserves	KCC Planning Permissions	Local Output Indicator 1
Construction Aggregate Landbank	Annual Aggregates Monitoring Survey	Local Output Indicator 1
Other Mineral Landbanks	Annual Aggregates Monitoring Survey	Local Output Indicator 3
Mineral extraction other than aggregates	Mineral extraction in Great Britain 2013 ¹²	Not directly applicable
Wharves and Rail Depots Safeguarding	Annual Aggregates Monitoring Survey	Local Output Indicator 4
Sales of Construction Aggregates at Wharves and Rail Depots	Annual Aggregates Monitoring Survey	Local Output Indicator 5
Additional Capacity at Waste Management Facilities by Type	KCC Planning Permissions/ Environment Agency	Core Output Indicator 6A
Municipal Waste (aka LACW) Management Profile	Defra Waste Datasets	Core Output Indicator 6B
LACW Growth Rate	Defra Waste Datasets	Local Output Indicator 6
Exports and Imports of Waste	Environment Agency Datasets	Local Output Indicator 7
Capacity for Managing Waste in Kent	Environment Agency Datasets/ KCC planning permission and monitoring data	Local Output Indicator 8

3 Mineral Indicators

3.1 Production of Aggregates

The principle aggregate monitoring process is the Local Aggregate Assessment (LAA). This is produced annually on the gathered previous calendar year sales and permitted reserve data supplied by the mineral operators to the County Council, as the Mineral Planning Authority for the area. The LAA documents can be found on the County Council's web page¹³. The latest County Council's LAA addresses the aggregate data for the calendar year 2022. The executive summary is reproduced below to give the main findings of this monitoring process. It should be noted that at the time of writing the LAA, it was subject to comments from the South East England Aggregate Working Party (see

¹² Published in February 2015, the data is for 2013 and has not been updated, is indicative and is supplemented with local enquiry sourced data where possible.

¹³ <https://www.kent.gov.uk/about-the-council/strategies-and-policies/environment-waste-and-planning-policies/planning-policies/minerals-and-waste-planning-policy#tab-4>

Appendix 5).

The executive summary reads:

In the case of both landwon soft sands and the sharp sands and gravel it is considered that the appropriate 'LAA Rate' or 'Annual Provisional Rate (APR)' for Kent remains that of the recorded 10-year sales average. Any estimated increases above this figure are not easily derived due to the inherent limitations in forecast modelling at the county scale. Moreover, the use of the 10- year average as a main determinate for calculating landbanks and future aggregate requirements is in accordance with the National Planning Policy Framework (NPPF). For landwon hard (crushed) rock however the County Council regards the last 6-year sales average to be the appropriate determinate given a set of specific local circumstances.

As in previous LAA reports, this report demonstrates that aggregate supply in Kent is provided by both imports and indigenous landwon materials. However, unlike the sharp sands and gravels, the soft sands (Folkestone formation crustal geological unit) that are predominantly a landwon resource, cannot easily be substituted by recycled or secondary materials. It also appears that little supply can be expected in the short to medium term from marine resources, as this has again demonstrated itself as only a small element of the overall marine won supply. Therefore, Kent will likely remain a significant supplier of landwon soft sands to markets within and, to an extent, beyond Kent. Soft sand reserves have decreased, although the productive capacity is not significantly altered. Sufficient reserves exist to meet the anticipated reviewed and extended Kent Minerals and Waste Local Plan's (KMWLP) 2013-30 requirements in maintaining an at least 7-year landbank to 2036. The anticipated Plan period for the emerging Plan ends in 2039 and there are available reserves at this point. Given a reduced and then flatlined predicted housing trajectory to 2040, and the current economic slowdown being experienced, seeking to identify additional soft sand local plan allocations for a potential shortfall that may become apparent mid to late 2030's is considered premature at this time, particularly when you consider the potential contribution from windfall sites. The position will be reviewed regularly by the LAA process. It is also the case that the statutory required 5-year plan reviews between 2024 (the anticipated start year for the reviewed Plan) to 2039 will afford sufficient time to address any identified shortfall.

With regard to the landwon sharp sands and gravel resource, the evidence continues to demonstrate that these superficial deposits are depleting, the reserves are not being replenished. There is therefore a correspondingly limited potential for Kent to meet the demand from landwon resources of this aggregate type. The apparently extended life of the landbank over the anticipated local plan review period (to 2039) is more a consequence of reduced annual sales depressing the Local Aggregate Assessment Rate/Annual Proportional Rate (LAARate/APR) than that of a landbank meeting needs into the future. The replenishment of 2.50 mt from the Minerals Sites Plan allocations (subject to planning permission) would make a contribution to the need although it is not anticipated that this will reverse the trend towards a greater reliance on importation of this land-won aggregate mineral.

The hard rock supply from the landwon resource in Kent remains significant. The reserves and their depletion rate were subject to confidentiality in the past given the lack of three operational sites. This was waived by the operator to allow for the matter of the supply of this aggregate to be reported in the LAA process and discussed in the public domain more openly. The drawdown acceleration of the reserves due to the high recent rates of extraction over the last 6-years has led to the County Council concluding that additional resources are required to maintain a steady and adequate supply of landwon crushed rock. Potential allocation(s) in a review of the Mineral Sites Plan are being considered. The Kent Minerals and Waste Local Plan 2013-30 (KMWLP) [Early Partial Review 2020] statutory fifth year review is currently being reviewed, subsequent to public consultation, to reflect this position.

Importation of sands and gravels from marine resources showed a marked decline in 2019, a recovery in 2020 that has continued into 2022. This was also a pattern displayed by hard (crushed) rock supply imported to wharves, though a slight decline in 2022 is noted. However, this pattern was not shown by rail depot importation which showed another year of reduction in primary aggregates importation. Rail importation, despite capacity continues to be underutilised, and remains relatively insignificant in overall supply terms, although hard rock is of more prominence than other aggregate types. Available wharf capacity is significant and has not materially altered, however it remains vulnerable to losses as their

locations often coincide with competing regeneration initiatives.

Recycled and secondary aggregates showed a fairly consistent pattern of sales in 2020 at 0.90mt, in 2021 to almost 1.0 mt with a slight decline to 0.84mt in 2022. Hard crushed rock wharf importation was at a record high of 1.77mt in 2021. This has declined only marginally to 1.48mt in 2022. Rail importation of this aggregate type similarly fell back from 0.44mt in 2021 to 0.361mt in 2022. Marine sand and gravel importation is now at 1.90mt in 2022, the highest level since 2014. In 2020 it was 1.44mtpa and in 2021 it was 1.64mtpa, this steady increases potentially demonstrating that the aggregate supply industry is moving towards an importation strategy rather than one based on landwon supply for this aggregate mineral type. Rail importation of sand and gravel has all but ceased, though this may be unrepresentative of future supply given that rail importation of this aggregate mineral has been in the 25-30ktpa since 2015. Importation of soft sand remains a negligible contributor to the overall supply of this aggregate mineral compared to the dominance of the landwon supply in Kent.

It remains the County Council's view that growth predictions in housing, infrastructure delivery and maintenance and the needs of the wider south east area are only indicative at best in terms of forecasting aggregate demand. The data demonstrates that overall construction aggregate demand increased in 2020 and in 2021, although it reduced in 2022, from 6.78mt of sales to 6.54mt. It is considered that any attempt to model changes to aggregate demand based on predictions in housing and infrastructure development would be unreliable. Moreover, housing growth¹ in Kent, based on the Kent local authorities objectively assessed needs are now showing an overall decline to 2040 compared to previous trajectories. Irrespective of what level of growth occurs in the county and within its neighbouring areas that are supplied by Kent, it will necessitate a robust safeguarding regime of the mineral importation facilities if a steady and adequate supply of aggregates to meet the objectively assessed needs is to be maintained.

The LAA 2023 includes a 'dashboard' to tabulate the main trends in aggregate supply and reserve levels. A simplified version of which is included in Table 5 below. Appendix 3 lists all the land-won mineral sites used for landbank calculations in Kent.

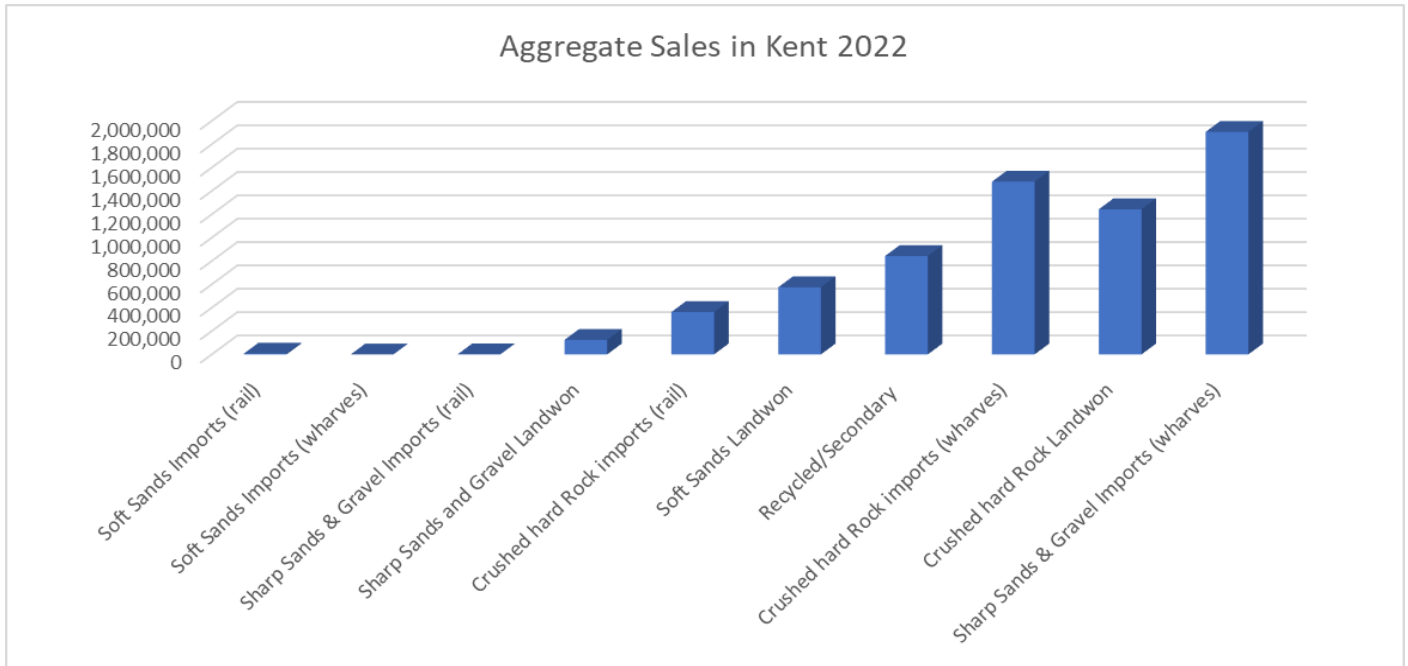
Table 5: LAA Derived Aggregate Monitoring Data 2022

Aggregate type	2022 Sales	10-year Average	Reserves	Commentary
Soft Sand (landwon)	0.574mt	0.475mtpa ↑	5.574mt ↓	Reserves have decreased from 6.22mt to 5.574mt, this and the slightly increased 10-year average requires the 3.2mt of allocated Mineral Site Plan resources over the Plan period to maintain supply over the emerging Plan period to 2039. In 2036 it is estimated that the maintained 7-year landbank (3.325mt) is no longer available, however windfall reserves estimated as at least 0.84mt may be available together with at least two statutory Plan review periods mitigates against identifying further allocations at this time.
Sharp Sand and Gravel (landwon)	0.124mt	0.176mtpa ↓	2.23mt ↓	Landwon reserves continue to be depleted and are not being replenished. The data gives the impression that the NPPF landbank requirements and supply are being met, however this is as a result of sales decreasing and depleting reserves. Importation is steady, supplanting the landwon element of sand and gravel supply overall.

Crushed Rock (landwon)	1.242mt	1.240mtpa (6-year sales average) ↑	14.85mt ↓	The 10-year sales average (LAARate/APR) is no longer considered appropriate given corrected sales data since 2017. With sales in excess of 1.0mtpa since that year, this justifies the use of a 6 year average (1.240mtpa). Reserves are being depleted and not replenished requiring further reserves to be identified to maintain supply to 203. If possible, as allocation(s) in the Kent Mineral Sites Plan.
Recycled /Secondary Aggregates	0.802mt	0.837mtpa ↑	N/A	Productive capacity remains significant (considered to be in the order of 4.0mtpa). Sales increased markedly again in 2021, and slightly fell back in 2022. The 10-year average is increasing. The sector is gaining in importance in overall supply, though it appears to be limited to approximately a 0.8-1.0mtpa range. This may be due to relatively poor participation with the annual aggregate surveys.
Imports marine dredged sand and gravel (wharves)	1.906mt	1.66mtpa (stable)	8.21mtpa is the reported productive capacity.	The predominantly marine originated imports via wharfage increased in 2022, as it did in 2021. There is underused importation capacity (as reported).
Imports marine crushed rock (wharfs)	1.479mt	0.989mtpa ↑	8.21mtpa is the reported productive capacity.	Sales fell in 2019 (reducing the 10-year sales average to 0.71mt) they rebounded to 1.12mt in 2020. In 2021 a significant increase to 1.77mt was recorded, this fell back in 2022 to 1.479mt, though wharf importation remains a significant part of the overall supply of this aggregate type that has high specification applications.
Rail Imports (Sand and Gravel)	725 tonnes	31,069 tonnes ↓	N/A	Rail importation continues to remain relatively insignificant in overall supply terms for sand and gravel in Kent.
Rail Imports (Soft Sand)	7,162 tonnes	6,684 tonnes ↓		Soft sand importation remains insignificant in overall supply. However, sales increased markedly in 2019 and 2020, with limited increases in recorded sales in 2021. In 2022 sales decreased though not by a significant margin.
Rail Imports (Crushed Rock)	0.362 tonnes	0.446mtpa ↑		The crushed hard rock importation 10-year average slightly increased in 2021 and again in 2022, though remains close to the 0.5mtpa range, that has been the case since 2018. Though not as significant as landwon supply or via wharf importation, rail importation has the advantage of being located further into Kent than coastal wharves and has potentially significant unused capacity.

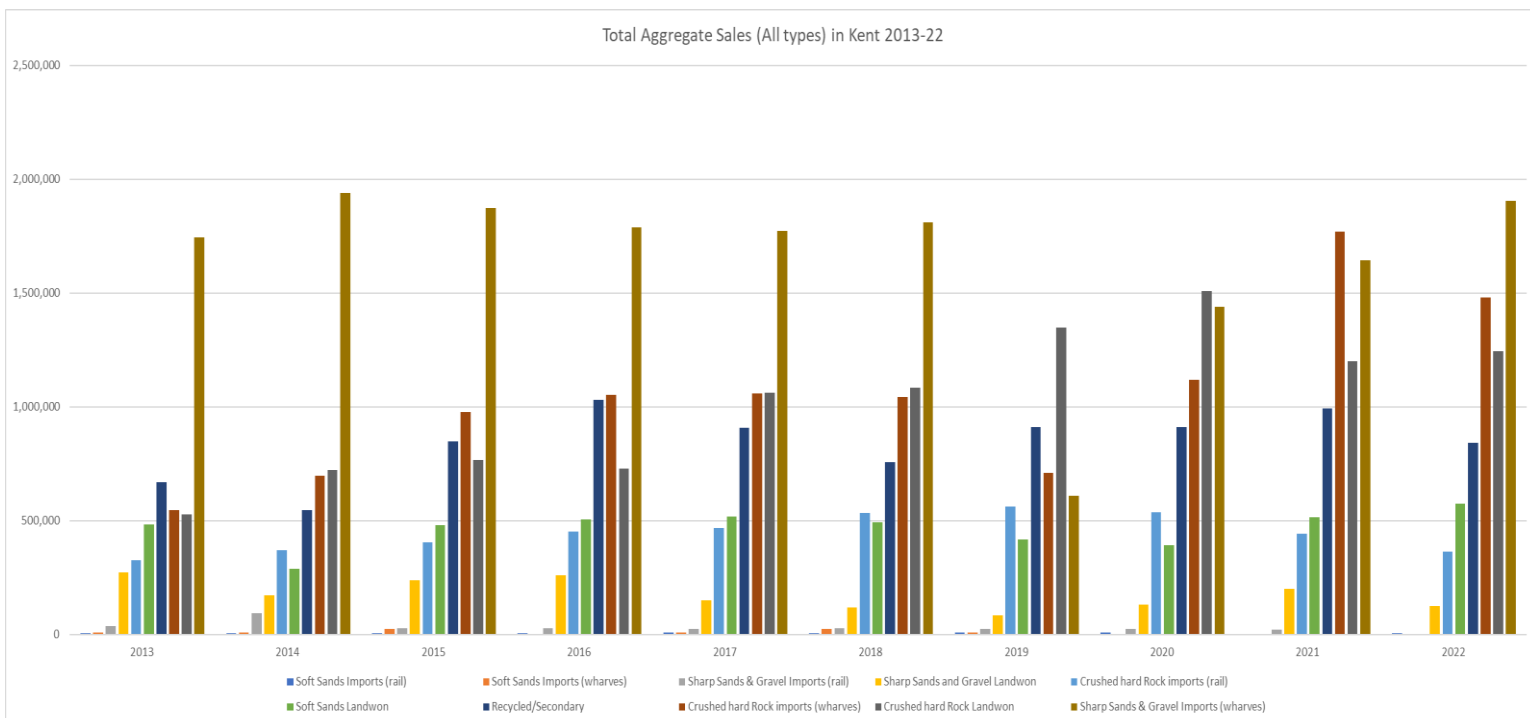
The graphical representation of the 2022 aggregate sales data is demonstrated below in Figure 7.

Figure 7: Total Aggregate Production (Sales) in Kent during 2022 (in tonnes)



The 2022 sales data clearly shows that importation via wharves of both hard rock and marine dredged sand and gravel are remaining the dominant elements of supply, with the landwon hard (crushed) rock and recycled/secondary aggregates being important, but of a lower magnitude. Although the landwon hard rock sales data revisions show that the landwon supply is more significant than previously reported. Landwon sand and gravel and imports via rail depots are insignificant. Soft sand importation is almost absent, the landwon component is the only realistic supply available to meet needs. When the sales of 2022 are compared to those that have occurred since 2013 the ten-year trends can be observed. Figure 8 shows this graphically.

Figure 8: Total Aggregate Production (Sales) in Kent during 2013-2022 (Million tonnes)



The uncertainty caused by the UK exiting the European Union (EU) clearly shows up in aggregate imports, particularly in the sand and gravel (predominantly marine origin) and hard crushed rock in 2019. This was reversed in 2020 and increased again in 2021. In 2022 imports grew again from sharp sand and gravel at wharves. What remains significant is that, except for landwon soft sands, primary aggregate importation is becoming the dominant mode of supply for sand and gravel and crushed rock aggregates. However, the Kent landwon hard rock component remains significant it is not dominant in overall supply of this aggregate type. Landwon sharp sands and gravel continued their relative decline, being essentially replaced by increased importation, particularly via wharves. The recycled/secondary aggregate supply gained prominence in 2021 and in 2022 it slightly reduced in recorded sales. It appears that approaching 1.0mtpa in recorded sales is the 'stable' level of secondary/recycled aggregate supply.

The LAA is based on an understanding of sales and permitted reserves, to establish how a local plan needs to respond to the need to maintain landbanks through any respective plan period. It is recognised that an understanding of consumption that occurs in a mineral planning authority area is less well understood and in order to address this, national periodic aggregate monitoring is undertaken. The most recent was undertaken by the British Geological Survey (BGS) in 2019. This was reported in AMR 2019-20. Data on consumption since is not available, although it is not anticipated that this would have markedly changed since the 2019 BGS data compilation. The key findings of the 2019 BGS survey demonstrate that Kent largely meets its own aggregate needs in consumption and plays an important role in supplying crushed rock to Surrey and East Sussex, Brighton and Hove. The next full BGS survey will be conducted in 2024 and the results of which will inform LAA 2024 and AMR 2023-24.

4 Landwon Other (Non-Aggregate) Mineral Landbanks

Permitted reserves and production rates for other (non-aggregate) minerals are not required to be monitored in the same way as construction aggregates. The County Council conducted its own extensive Non-Aggregates Mineral Surveys in 2008 and 2011 as part of the evidence gathering for the KMWLP 2013-30. Updates using the latest figures (where provided) are included in this AMR for the 2022/23 period.

Moreover, unlike the Annual Monitoring surveys conducted by SEEAWP, the County Council's own surveys do not benefit from the support of trade associations and as such they do not necessarily achieve a full response rate. The information obtained for this AMR (and previous AMR reports) has therefore been combined with estimates of reserves and production rates drawn from previous survey returns, planning applications and other publicly available documents.

4.1 Brick and Tile making from Clay or Brickearth

The NPPF requires MPAs to maintain landbanks of brickclay (therefore it is reasonable to include brickearth) of at least 25 years and to take account of the need for provision of brick clay from a number of different sources to enable appropriate blends to be made. This requirement is reflected in Policy CSM 2 of the adopted KMWLP (as Partially Reviewed) 2020.

As has been reported in earlier AMR reports, brickwork closures in previous years have had a substantial impact on the brick manufacturing capacity in Kent and on the distance that material extracted from currently consented sites travels within the county. Whilst there is a brickwork utilising brickearth (Smeed Dean Works, Sittingbourne currently operated by Wienerberger (UK) Ltd) there are currently no operational brickworks in Kent which use purely clay deposits as a raw material in brick manufacture.

However, there is a tile manufacturer (Babylon Tile Works) in the Weald of Kent south of Maidstone, which makes Kent peg tiles from clay reserves adjacent to the works. The permitted

reserves at this site more than meet the KMWLP requirements for supplies of brick clay (at least 25 years). The previous planning permission required extraction to cease by April 2022 and for Kent peg tile manufacture to cease a year later. A new planning permission was granted in October 2019 to extend the life of the site for at least a further 25 years. No data on sales and reserves were available in the 2022-2023 AMR reporting period. However, it is reasonable to assume the majority of reserves remain unused as production is sporadic and small scale.

Brickearth has historically been an important mineral in Kent for stock brick manufacture (also called London Stock Bricks or London Stocks), that significantly characterises Victorian structures in Kent and in many parts of London. At present, only one operator, Wienberger (UK) Ltd, has an active brickwork that uses brickearth to produce stock brick products at the Smeed Deen Works in Sittingbourne. Current reserves come from one site at Paradise Farm (that has significant reserves) in the Sittingbourne area. The life of the permitted reserves has been reconsidered against anticipated extraction rates in 2021-22. This revised the position reported in AMR2018/19, that stated that the available reserves were potentially 21-22 years which was below the 25-year KMWLP requirement. In 2023 the operator confirmed the available reserves would last between 22-29 years if extraction occurred each year. This is not always the case, with some years there being no extraction. It is reasonable to conclude that the available reserves meet the policy requirements of the KMWLP and the NPPF (2023) at this time. Table 6 below illustrates the anticipated remaining lifespans of the permitted reserves left in Kent at this time.

Table 6: Clay and Brickearth Landbanks at Active Brick and Tile Works

Works	Operator	Source	Estimated Length of Supply
Babylon Tile Works, Maidstone (Kent peg tile manufacturer)	V&M Gash	Weald Clay	Estimated as being over 25 years of reserves remaining, production small scale and sporadic
Orchard Farm, Sittingbourne	Wienberger Ltd	Brickearth	Extraction ceased in 2020 and restoration required to be completed by mid-2023
Paradise Farm, Sittingbourne	Wienberger Ltd	Brickearth	Between 22 -29 years as of March 2023
Pluckley Quarry, Ashford ¹⁴	Pluckley Brick Company	Weald Clay	Over 25 years supply (site apparently abandoned in 2022 and for sale for potential residential development)

4.2 Silica Sand

Both soft and silica sands are extracted from the Folkestone Formation. The latter is in its particularly pure form, free of iron rich gain coating minerals (such as Hematite) that give it the characteristic 'buff' colouration when used in mortar production. Being free of 'contaminants' it can be used in a range of industrial applications where a pure or near pure source of silicon dioxide (quartz) is required.

National planning policy on silica sand requires Mineral Planning Authorities to plan for a steady and adequate supply (of industrial minerals) by the provision of a stock of permitted reserves of silica sand. This should be of at least 10 years of reserves for individual existing sites and for at least 15 years of reserves for sites where significant new capital is required for the establishment of a new facility. This requirement is reflected in Policy CSM 2 of the adopted KMWLP (as Partially Reviewed in 2020). The emerging changes to the KMWLP do not alter this part of the

¹⁴ Pluckley Brickworks ceased to operate in 2016, and the plant site is subject to a planning allocation for residential development (Ref. 18/01402/AS), however clay extraction for production outside the County continued into at least 2021-22.

policy.

In the past, Aylesford Quarry Sand Pit, near Maidstone was identified as a site with substantial reserves of silica sand. However, production ceased in 2012 and remaining reserves are substantially below the water table and no longer considered viable to extract. Nepicar Sand Pit and Addington Quarry (Wrotham) are now regarded as sites that produce silica sand in Kent. Nepicar Sand Pit was considered as nearing the end of its productive life for silica sand, although further evaluation of reserves in 2021 demonstrates that there are reserves present. In 2022 significant silica sand reserves have been identified at this site. The estimated timespan of supply at these sites, as indicated in Table 6, calculated from 2022 sales rates (where they occurred) and reserves. Both sites meet the KMWLP requirement of a 10-year minimum permitted reserves for existing sites. Whilst Ightham Sandpit, Borough Green Road, Ightham is included in the table, it has minimal silica sand reserves remaining. This site has historically been considered one that has produced silica sand for aerated (cellular concrete) blocks, although other materials such as PFA have increasingly (up to 80%) been used in the production process. This has not negated sand requirements and it appears importation is now meeting this need. Table 7 below illustrates the anticipated remaining lifespans of the permitted silica sand reserves left in Kent at this time.

Table 7: Landbanks at Silica Sand Quarries in Kent

Site	Operator	Estimated Length of Supply
Addington (Wrotham) Quarry, Addington, West Malling	Fern Aggregates	Over 25 years
Nepicar Sand Quarry, Wrotham Heath, Nr Sevenoaks	Nepicar Sand Ltd	Potentially over 25 years
Ightham Sandpit, Borough Green Road, Ightham Sevenoaks	H&H UK Ltd	Limited reserves remaining

4.3 Chalk and Clay

4.3.1 Chalk for Cement Production

The requirement for Chalk and Clay for cement manufacture is reflected in Policy CSM 3 of the adopted KMWLP with the identification of the strategic Site for Minerals, this being the Medway Cement Works at Holborough in the River Medway Valley (that is partially within the area of the unitary authority of Medway). The mineral resources at this site are sufficient for at least 25 years of cement manufacture. As this site has been granted planning permission, as part of the update to the adopted KMWLP, it is proposed that the allocation be deleted as the reserve is safeguarded by the Plan's safeguarding policies.

There are currently no active cement quarries in Kent, the consented reserves of chalk and clay for cement manufacture at the permitted, but not yet built, Holborough Cement Works will address this requirement when it becomes an operational site, as detailed in Table 8 below.

Table 8: Chalk and Clay Landbanks at Cement Works in Kent

Site	Operator	Estimated Length of Supply
Holborough Cement Works	Lafarge Cement UK	Not yet constructed though planning consent implemented, supply sufficient at planned consumption rate for over 25 years

4.3.2 Chalk for Agricultural and Engineering Uses

Chalk is used in agriculture and civil engineering in Kent, as well as being used as a constituent

in the production of bricks, tiles and cement and some other processes such as pharmaceutical production and pigmentation (paper, paints.). Chalk for civil engineering and agricultural use is not covered specifically in current national minerals policy guidance. However, the general advice on maintaining a sufficient supply of minerals, as set out in part 17, paragraph 215 of the NPPF (2023), remains pertinent to the planning of all mineral types. This requirement is reflected in Policy CSM 2 of the KMWLP: Supply of Land-won Minerals in Kent. The permitted reserves, that are required to enable an adequate supply to be maintained through the plan period, are monitored for AMR reporting purposes. However, this has not always resulted in comprehensive participation, as experienced again in the 2022/23 reporting period. In the absence of more reliable data, the current position in Kent for chalk used in agricultural and engineering applications can be extrapolated using past data on reserves and extraction rates as set out in Table 9 below.

Table 9: Agricultural and Engineering Chalk Landbank in Kent in 2022-23

Average sales (2022-23) per annum rate estimated.	Total Estimated reserves at end of 2022	Landbank Life
6,000tpa	0.496 million tonnes	82+ years

The average estimated data above shows that Kent has a potential agricultural and engineering chalk landbank equal to over 82 years. Essentially the same that was reported in 2021/22, and as over 100 years in 2019/20. These estimations are considered as only indicative rather than absolute, as poor participation in survey requests has prevented an accurate picture of the extraction average and landbank life. In 2020 the effects on demand due to Covid-19 mitigation measures (lockdowns), had a significant impact on the overall extraction rate average, however it is not thought that this has materially increased in 2022/23. Further monitoring will be required to establish if the past extraction rates in the order of 70,000tpa as seen in 2018/19 returns.

The adopted Plan seeks provision to 2030, with the Review KMWLP period to 2039. Therefore, there is the possibility that there is an insufficient permitted landbank to maintain a supply of chalk for these purposes over the anticipated Plan period. Particularly if extraction rates again rise to the high historic levels of 70,000tpa. However, as has been demonstrated in past AMR reports, sales can be highly variable from year to year. In terms of the Full Review of the KMWLP, and subsequent statutory reviews of this Plan, monitoring will continue and inform future need.

4.4 Engineering Clay

As previously reported Kent has freestanding clay working permissions with significant deposits of consented clay. However, only one of these sites remains active currently. The reserves in other sites have not been worked for many years or are dormant 'Interim Development Order'¹⁵ sites and therefore cannot be realistically included in the current landbank.

Whilst this AMR cannot report on sales from individual sites due to commercial confidentiality, it can be reported that an average of 27,400tpa of clay from land-won sources was sold in the years between 2000-2009, for which data was available. In 2014 there was activity to supply 25,000 tonnes of sea defence engineering clay (via a temporary permission now expired), and some 64,000 tonnes of materials for construction material manufacture. In 2020 sales activity data demonstrated a hiatus in extraction. In 2021 it was reported that the engineering clay reserves were only sufficient for the capping purposes of the associated hazardous waste facility site where the clay (London Clay) is extracted from (Isle of Sheppey). In 2023 this position has

¹⁵ Interim Development Order sites are those with permissions granted between 1943-48 that were successfully registered by Kent County Council as the responsible Mineral Planning Authority in accordance with the Planning and Compensation Act 1991

been reaffirmed by the operator.

Given the NPPF does not require specific landbanks to be maintained, the likely reserves in existence in 2022/23 and the lack of any meaningful sales to general market, there is likely to be sufficient capacity to meet future needs.

5. Waste Indicators

5.1 Local Authority Collected Waste Arisings by Management Type

Waste data in the form of the WDI from the Environment Agency is reported in calendar year, and not in the AMR financial year. The most recent data is for 2022. The County Council's own waste monitoring is for the financial year 2022/23 relating to LACW alone. The Local Authority Collected Waste (LACW) arising in Kent in the 2020/21 AMR period was reported by Defra as being 678,893 tonnes. This represents a decrease of 2.4% on the 2019/20 AMR period value, which itself represented a fall of 3.5% on the previous year. The 2022/23 tonnage proportions by management type and the percentage change from the previous monitoring year (based on actual tonnage) are set out in Table 10 below. Data shows that LACW sent to landfill is just 0.167% of all collected waste. In the 2021/22 report period this was 2% of collected waste and is a significant positive change in diverting waste up the waste hierarchy away from disposal to land. The recycling and composting rate in 2022/23 has fallen to 39% as compared to 44 % in the 2021/22 AMR period. However, this is partly offset by changes to energy from waste which has increased, at 59% up from the 54% recorded in 2021/22. The lack of 'sent for treatment' data in 2022/23 may be distorting the percentages, albeit marginally.

Table 10: Collected LACW Arising in Kent by Management Type, 2022/2023

Management Type	Tonnes	Percentage of Total Collected LACW	Change from 2021/22
Recycling / Composting	260,138	38.98%	298,702 (a decrease of 38,564 tonnes which equates to a fall of 12.91% on 2021/22 value)
Energy Recovery (EfW)	396,138	59.30%	365,640 (an increase of 30,498 tonnes which equates to an increase of 7.69% on 2022 value)
Treatment	10,373	1.55%	No comparable data
Landfill	1,120	0.167%	14,551 (a decrease of 13,431 tonnes which equates to a fall of 92% on 2022 value)
Total	668,104	100%	678,893 tonnes A decrease of 10,789 tonnes (10.16%) on 2022 value

The Government's Resources and Waste Strategy for England (2018) set out how material resources will be preserved by minimising waste, promoting resource efficiency and moving towards a circular economy. It combines actions to be taken now with firm commitments for the coming years and gives a clear longer-term policy direction in line with the 25 Year Environment Plan. The objectives include a target to recycle 65% of municipal waste by 2035 with no more than 10% ending up in landfill, for zero avoidable waste by 2050 and a requirement for all food waste to be collected separately and eliminate food waste to landfill by 2030.

The Government's Net Zero Strategy: Build Back Greener published in October 2021 gave a commitment to funding the separate collection of food waste from all households by 2025 and stated a target date of 2028 for the diversion of virtually all biodegradable waste from landfill.

The Kent Joint Municipal Waste Management Strategy (KJMWMS) was adopted by the collection and disposal authorities of Kent (working together through the Kent Waste Partnership) in 2007. The Strategy was refreshed in 2018/19 and is due to be reviewed again in 2022, though to date this has not occurred. The work of the Partnership has been taken on by the Kent Resource Partnership (KRP) and the following targets for household waste adopted:

- Recycling/composting rates at least 50% by 2020/21; and
- landfilling no more than 2% by 2020/21.

Table 10 demonstrates that in 2022/23, Kent remains below the recycling/composting policy target of 50% by 2020/21 set out in Policy CSW 4: Strategy for Waste Management Capacity in the KMWLP. There is no KMWLP recycling/composting policy target for 2022/23. However, the landfill diversion target was surpassed some two years earlier than anticipated, which targeted 2% of LACW (as residual waste) to landfill by 2025/26, as in 2023 this has been reduced to 0.167%.

Figures 9 and 10 illustrate the past trends in the management of the LACW between 2010-11 and 2020-21, both in tonnes (Figure 9) below and percentages (Figure 10) overleaf.

Figure 9: Collected LACW by Management Method 2010-11 to 2020-21 AMR Periods

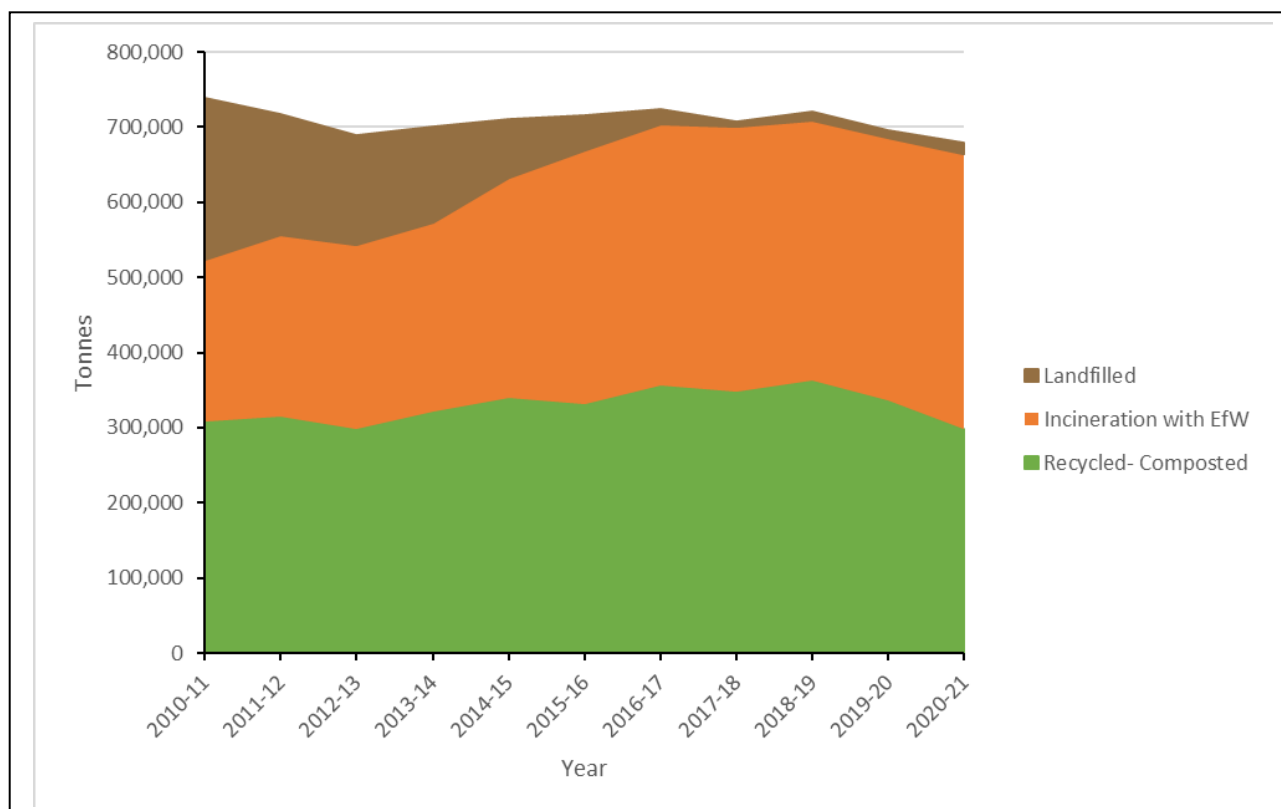
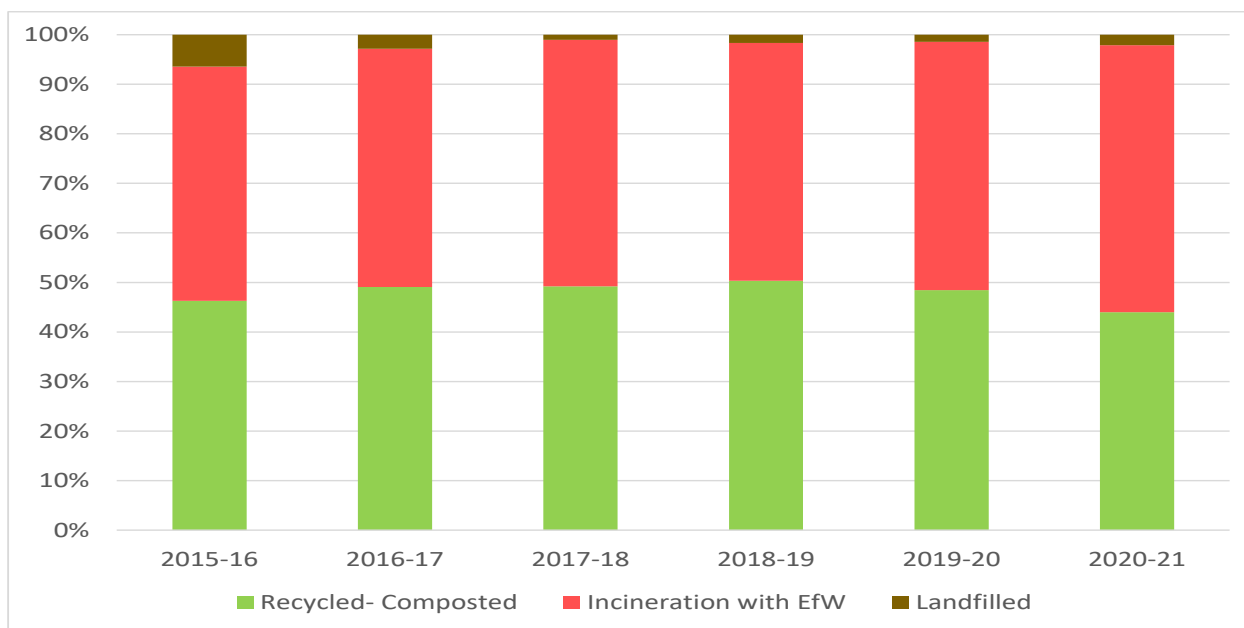


Figure 10: Collected LACW by Management Method 2015-16 to 2020-21 in Percentages



During the period between AMR 2018/19 and 2022/23, overall LACW arisings have fallen. There has been a continuing decline in the proportion sent to landfill (6.5% in 2015-16 to 2.1% in 2020-21 and 0.167% in 2022/23). Recycling and composting being taken in combination increased from 46.3% in 2015-16 to a peak at 50.32% in 2018/19 and then reducing to 44% in 2020-21 and 39% in 2022/23. It should be noted that the combined recycling/composting rate can fluctuate annually due to variations in green waste production which is in turn heavily influenced by annual changes in climatic conditions. Food waste, as a compostable component, has been monitored by the County Council’s Waste Management Authority, and has been found to be reducing year on year. This may be a reflection of the current economic climate of the UK, leading to lower wastage of domestic food waste and reducing the overall compostable proportion of the LACW stream. Legislation is in place for separate collections of food with weekly waste collections across the UK by 2026. Once this is achieved the compostable fractions and their proportionality will be able to be more determined. It should be noted that the recovery activity as a proportion of the managed LACW wastes has increased, a possible indication that less compostable material, as an overall proportion, is being collected at this time. Figures 11a below and 11b overleaf illustrate the 2022/23 data graphically.

Figure 11a: Collected LACW by Management Method 2022/23 in Tonnes

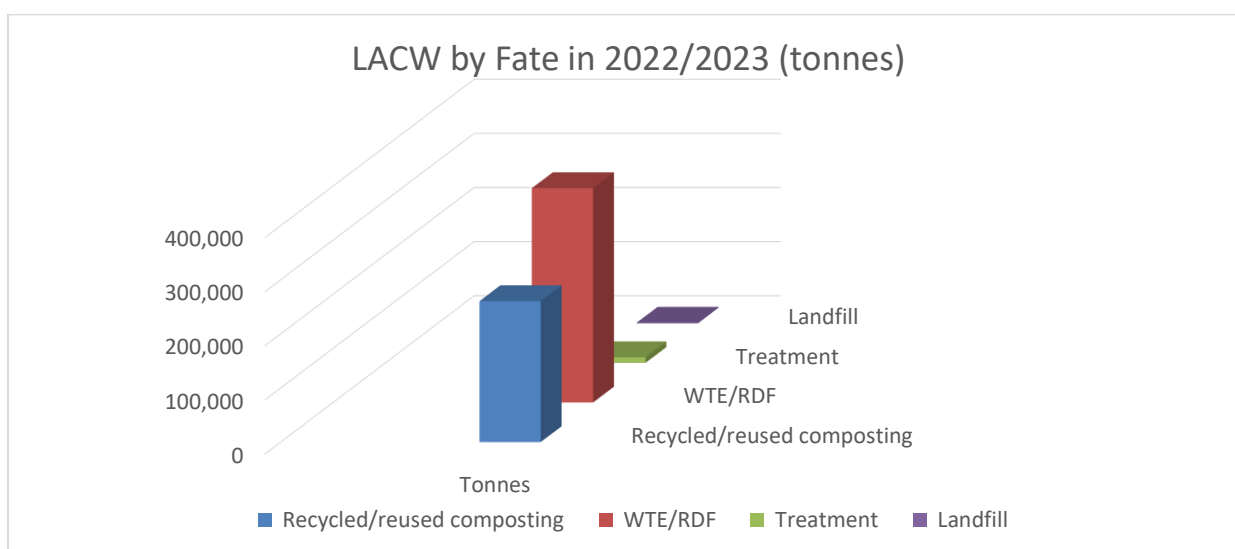
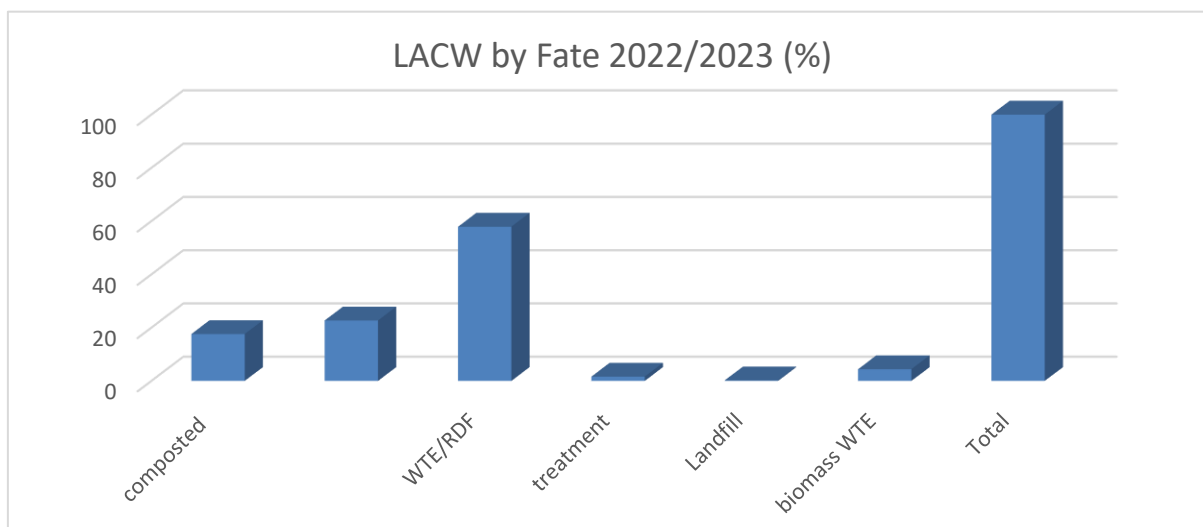


Figure 11b: Collected LACW by Management Method 2022/23 in Percentages



5.2 Waste Generation Growth Rates

5.2.1 Local Authority Collected Waste (LACW)

As shown in Table 10 (page 37), the amount of collected LACW in 2021-22 decreased from 695,636 tonnes as reported in 2019-20 to 678,893 tonnes, a decrease of 2.4%. In 2022/2023 a reported 668,104 tonnes was collected continuing this decrease. The trend of decreasing waste generation by the LACW sector appears to be maintained. Housing growth in Kent is projected to continue to increase to 12,000 units per annum until 2025, then reduce to 10,000 units per annum in 2030-31 before stabilising at some 8,000+ units per annum to 2040. Therefore, LACW tonnage is expected to rise even in the face of per household reductions that may be achieved due to minimisation measures, and anticipated decoupling of rising household expenditure and waste production. The actual amount of LACW increases, if indeed realised, will be a matter for future AMR reports to identify.

Kent County Council as the Waste Disposal Authority (WDA) has undertaken an infrastructure review to determine the potential additional management capacity which may be required. This covered both Waste Transfer Station (WTS) facilities as well as Household Waste Recycling Centers (HWRCs). The need for at least 5 new or improved WTS facilities across the County up to 2030 has been identified as shown in Table 11 below.

Table 11: WTS Projects

WTS Sites	Project Type	Serves (District)
Folkestone WTS	New (additional)	Folkestone
Ebbsfleet WTS	New (additional)	Gravesham, Dartford
Sevenoaks WTS	Replacement	Sevenoaks
Sittingbourne WTS	Extension	Swale
Tunbridge Wells WTS	Replacement	Tunbridge Wells, Tonbridge and Malling

In addition to WTS facilities, depending upon growth, a number of existing HWRC sites may need additional capacity. KCC would seek Developer Contributions to help support these projects, as there is a direct link between demand on management facilities and housing growth. Regular capacity assessments are undertaken to update the findings of the infrastructure review, with projects identified as required.

5.2.2 Commercial and Industrial Waste (C&I)

Commercial waste is defined in the KMWLP as waste from premises used mainly for trade, business, sport, recreation or entertainment, as defined under Section 5.75(7) of the Environmental Protection Act 1990¹⁶. For example, it is likely to include timber, metal, paints, textiles, chemicals, oils and food waste, as well as paper, card, plastic and glass. While industrial waste is waste from any of the following activities/premises: factory/manufacturing, provision of transport services (land, water and air), purpose of connection of the supply of gas, water, electricity, provision of sewerage services, provision of postal or telecommunication services.

Annual data on the amount of C&I wastes produced in Kent is not routinely available. Work undertaken by BPP Consulting¹⁷ to support the Early Partial Review in 2020 estimated that arisings in 2015 were just under 1.2mt which by 2031 could rise to some 1.4mt. In line with national Planning Practice Guidance (Paragraph: 032 Reference ID: 28-032-20141016 Revision date: 16 10 2014) it was assumed that there will be positive growth.

Table 12 below sets out the growth rates applied over the period 2016-2031 to generate the updated C&I waste forecasts used to inform the Early Partial Review of the Plan. This has been applied to the revised baseline value obtained for 2020 and extended to encompass the proposed extended KMWLP period to 2039.

Table 12: Forecast arisings of C&I Waste in Kent (tonnes per annum)

	2021	2026	2031	2036	2041
Growth Factor Applied	0.07	0.05	0.05	0.05	0.05
WNA Forecast using 2015 Baseline underpinning adopted plan	1,274,082	1,338,702	1,407,630	n/a	n/a
Forecast C&I arisings with Updated 2020 Baseline	1,107,943	1,164,136	1,224,076	1,287,102	1,353,372

By using the Environment Agency's (EA) Waste Data Interrogator (WDI) for 2022 and taking away the known LACW arisings (2022) in Kent a figure for the C&I waste arisings can be derived as an indicative figure of some of 1.005mt. This is slightly lower than the 2020 estimations conducted for the Early Partial Review of the Plan in 2020. This may be due to different assumptions of what constitutes C&I wastes. Further monitoring will demonstrate if this waste sector is reducing through time, rather than growing as estimated in 2020.

5.2.3 Construction Demolition & Excavation Waste (C, D&E)

The adopted Kent Minerals and Waste Local Plan (KMWLP) defines C, D& E waste as follows:

"This is a waste arising from any development, redevelopment, or demolition of existing schemes. It includes vegetation and soils from land clearance, demolition waste, discarded materials and off-cuts from building sites, road schemes and landscaping projects. It is mostly made up of stone, concrete, rubble and soils but may include timber, metal and glass."

¹⁶ <http://www.legislation.gov.uk/ukpga/1990/43/contents>

¹⁷ See Kent Waste Needs Assessment (WNA) 2017, Commercial & Industrial Waste Generated in Kent Management Requirements, November 2017, Version 1.2

It remains the case that the most recent comprehensive national study on inert C, D&E waste arisings was conducted in 2005 for the former DCLG, now Department for Levelling Up, Housing and Communities. This data was disaggregated to estimate the waste arisings in Kent alone, based upon the relative populations of Kent and Medway. This method generated an estimate of 2.6mt of inert C, D&E waste that arose in Kent in 2005.

An updated estimate of the arisings of the C, D&E wastes in Kent was produced applying a revised national methodology and this generated an estimate for 2020 of 2.5mt. Projecting forward arisings, a zero-growth rate was adopted in line with national Planning Practice Guidance (Paragraph: 033 Reference ID: 28-032-20141016 Revision date: 16 10 2014).

This work found that, when considering the consented capacity (that has not changed significantly in 2022-23) to manage the predicted CD& E arisings following a preferred management profile, there was sufficient capacity available over the adopted Plan period, when the waste needs assessments as set out in Table 13 below.

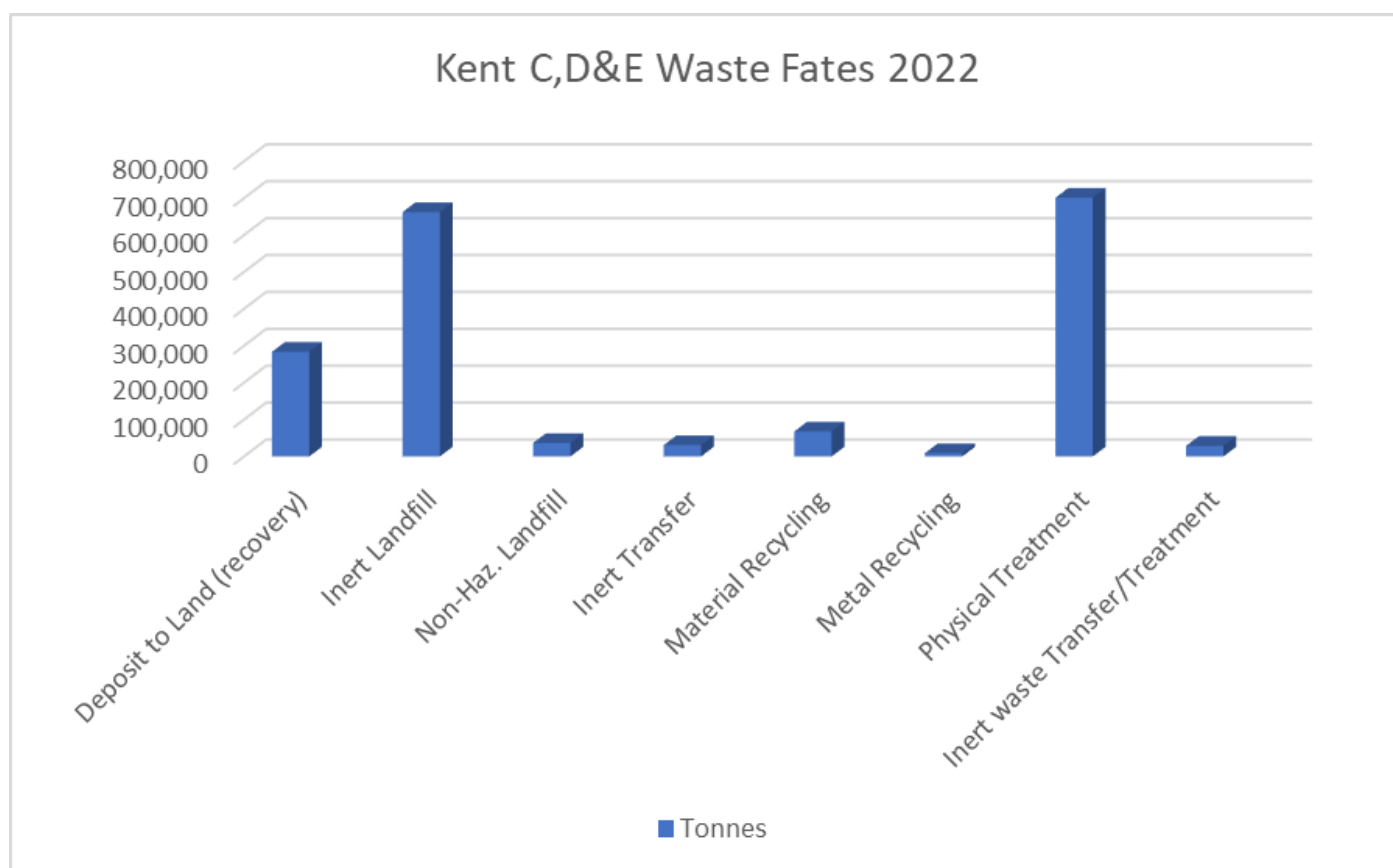
Table 13: Kent C, D&E Waste Management Requirements against Existing Capacity 2019

Management Route	Peak Annual or Cumulative (for permanent deposit /landfill) Requirement to 2038 (tonnes)	Capacity Assessed as available	Comment
INERT COMPONENT			
Inert Recycled Aggregate	1.4M	3.9Mtpa	KMWLP states "5.8.2 The consented secondary and recycled aggregates processing capacity within Kent currently exceeds 2.7Mtpa, 0.63 Mtpa of which is identified as temporary capacity." Para 5.8.3 includes a commitment to maintain productive capacity of at least 2.7 million tonnes per annum throughout the Plan period via Policy CSM 8. No additional capacity required.
Permanent Deposit to Land (Inert CDEW)	11.8 million t = 7.86Mm ³ at 1.5t/m ³	inert void of just over 5.7M tonnes but does not include operations permitted as recovery to land	KMWLP states " 6.11.2 The <i>Needs Assessment</i> shows that Kent has existing permitted inert waste landfill capacity that is more than sufficient to meet Kent's need for the plan period. " However, this refreshed review suggests that void may not be as plentiful as previously assessed. Moreover, the current assessment of available void is highly dependent on minerals being worked at the rate required to create the void needed. Depending upon the above, additional capacity may be required.
NON-INERT COMPONENT			
Separated for recycling	352,554	>2.4Mtpa	No additional capacity required.
Non-Inert (EfW)	125,912	44ktpa (surplus)	MVV Biomass Plant at Ridham has capacity c 170,000tpa. So, it suggests a capacity surplus of c44ktpa. No additional capacity required.
Non-Inert Landfill	150,581t - 150,581m ³ as 1:1 assumed with trommel fines	1.6Mm ³ of non-haz void	Given the surplus of EfW capacity in Kent, the remaining landfill capacity of c1.6Mm ³ at Shelford Landfill is not required to meet a predicted need for the future management of LACW & C&I waste. Therefore, non-inert residues from C, D & E waste may be accommodated. No additional capacity required.

The capacity needs assessment work in 2019 demonstrated that additional consented capacity was not required. Policy CSW 11: Permanent Deposit of Inert Waste, was modified in the Early Partial Review Plan 2020 to make more explicit reference to the possible role that the deposit of inert waste for beneficial use including engineering operations can make to managing inert excavation waste, providing it does not have an adverse effect on the availability of material for progressive restoration of Kent's mineral workings within the vicinity. This was intended to encourage such schemes to come forward, ensuring that sufficient permanent deposit to land capacity remains for inert waste for the Plan period.

Since the adoption of the Early Partial Review Plan in 2020, further data on the CD & E waste arisings in Kent are available for 2022 within the EA's WDI. Figure 12 below demonstrates that the change to the policy may be having the effect of diverting inert waste to land recovery. Whilst inert landfill of the inert wastes remains high, this is assumed to be elements that cannot be otherwise recycled/reused or recovered.

Figure 12: Kent C, D&E Waste arisings by Fate 2022 in tonnes



5.2.4 Hazardous Waste

Policy CSW 12 contained in the adopted plan seeks to ensure sufficient capacity is provided in Kent to maintain net self-sufficiency in the management of hazardous waste throughout the Plan period to 2030. It should be noted however that there is no national policy expectation for net self-sufficiency in this waste stream alone to be achieved at Plan area level. Hazardous waste arises from households, commercial and industrial, and from the incineration (with or without energy recovery) and the process of managing residual wastes from these waste streams.

In 2020, the total amount of hazardous waste consigned through the EA's Hazardous Waste Interrogator (HWI) as arising in Kent was circa 172,000 tonnes. This compares with

circa 146,000 tonnes consigned into Kent facilities for management (including Kent waste). Given the potential for omission, the WDI has also been interrogated to find that some 199,173 tonnes of hazardous waste arising from Kent was shown as managed through permitted sites reporting through the WDI. This compares with 168,091 tonnes managed at permitted sites within Kent. The 2022 HWDI indicated that this increased to 185,935 tonnes. The available HWI 2022 data indicates that Kent had the following tonnes of hazardous wastes managed in Kent (including Kent's arisings) as set out in Table 14. Some 186,645 tonnes of Kent's hazardous wastes were managed in Kent in 2022, a marginal increase over 2021.

Table 14: Total Kent Hazardous Waste Arising Managed by Fate 2022

Waste Fate Hazardous Wastes	Tonnes Managed in UK
Incineration with energy recovery	135
Incineration without energy recovery	2,165
Landfill	24,201
Long Term Storage	694
Recovery	78,297
Rejected	169
Transfer	30,842
Treatment	50,142
Total	186,645

Comparing this data to how arisings were managed in Kent a picture of the Kent relative self-sufficiency for hazardous waste arisings can be assessed. This is set out in Table 15 below.

Table 15: Total Kent Hazardous. Waste Arising by Fate 2022 is managed in UK and in Kent

Waste Fate Hazardous Wastes	Kent Waste Managed In UK	Kent Waste Managed in Kent	% of Kent Waste managed in Kent
Incineration with energy recovery	135	1,478	90.86%
Incineration without energy recovery	2,165	0	0%
Landfill	24,201	11,388	47.5%
Long Term Storage	694	0	0%
Recovery	78,297	23,197	29.62%
Rejected	169	97	57.39%
Transfer	8,542	15,038	56.80%
Treatment	50,142	8,290	16.53%
Total	185,645	59,487	32%

The overall amount of hazardous waste since 2020 has reduced. The degree to which Kent was net self-sufficient was at 34.1% (overall) in 2021 and data for 2022 demonstrates that there has only been a slight reduction in hazardous waste self-sufficiency at 32%. Moreover, the arguable low degree of self-sufficiency in managing the area's hazardous waste arisings can be explained by specialised nature of this waste stream that the facilities dealing with this waste tend to have a broad catchment area in order to operate viably. In addition, once established they have a limiting effect on other facilities coming forward in any one administrative area.

5.2.5 Air Pollution Control (APCr) Hazardous Wastes

During the course of incinerating waste, flue gases are generated that require treatment. This is achieved through the addition of catalysts such as ammonia. This process generates a solid residue known as APCr which has in the past required onward management as a hazardous waste. Defra's strategy for the management of hazardous waste (2010) sought to ensure that hazardous waste moves up the waste hierarchy, while ensuring that the Best Overall Environmental Option (BOEO) is secured for hazardous waste. It specifically addressed the landfilling of waste such as APCr which required seeking a relaxation of waste acceptance criteria of hazardous waste landfill from the European Commission. It was stated that this arrangement would be phased out noting that continued landfilling of hazardous waste is contrary to proper application of the waste hierarchy and acts as a disincentive to alternative treatment. The Government's commitment to moving hazardous waste up the hierarchy was reiterated in the Resources & Waste Strategy for England released in 2018.

In 2020, APCr arisings continued to be landfilled at Norwood Quarry, albeit at a reduced rate as Allington APCr was managed through treatment methods as well. At the end of 2020, the remaining void at the consented landfill at Norwood Quarry stood at 98,187m³, with less than 19,000 tonnes of the total circa 37,000 tonnes produced at Allington having been landfilled there. It should be noted that conditional planning permission was granted to allow residues from facilities other than Allington EfW to be accepted at Norwood Quarry. Given the above, the necessity of the strategic allocation was kept under review, and Policy CSW 5 was modified during the Early Partial Review of the KMWLP in 2020 to ensure that if the allocated extension was consented, the site can be restored to the approved final landform should landfilling of APCr cease.

At the time the Allington EfW plant was consented (2000), it was recognised that there was a need for a reliable management route for the resulting APCr and that this was met through the provision of dedicated hazardous waste landfill capacity at Norwood Quarry on the Isle of Sheppey. Given the ongoing production of APCr at Allington, the void at the landfill is forecast to be exhausted during the current adopted Plan period. In addition, further incineration capacity has been consented and is operational within Kent, generating more APCr requiring management. Hence Policy CSW 5 made provision for an extension to Norwood Quarry to ensure sufficient capacity is provided for Kent produced APCr over the Plan period. This was the position against the backdrop of the Kent MWLP objective of maintaining net self-sufficiency for hazardous waste management throughout the Plan period as set out in the adopted version of the KMWL Plan (as amended by the Early Partial Review) 2020. Nonetheless, it is now proposed to delete Policy CSW 5 as part of the current full Plan review, as its retention no longer accords the planning policy guidance and the Government's Resources & Waste Strategy for England 2018. In particular as emerging recovery technology will negate future landfill reliance in this waste's management.

5.3 Exports and Imports of Waste in Kent

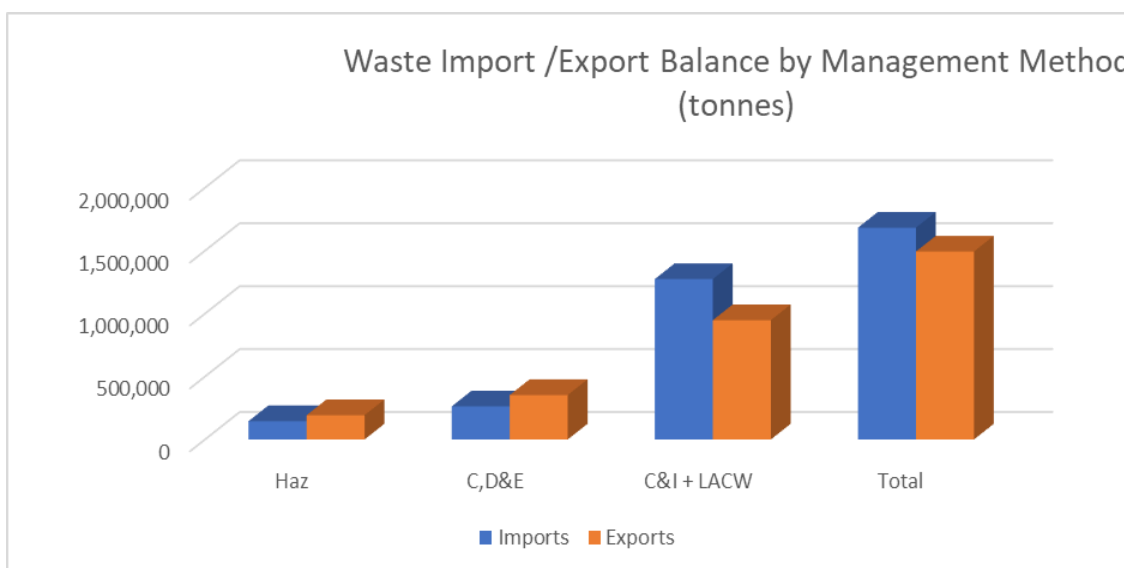
Information concerning the quantities, origins and destinations of waste managed at permitted sites is published annually in arrears by the Environment Agency in their Waste Data Interrogator (WDI 2022 Waste Received). Table 16 overleaf, shows the tonnages of Kent waste managed in permitted facilities within Kent and outside, and the tonnages of waste managed in Kent, whether from within Kent or outside of the county. The data covers C&I and LACW aggregated together, C, D &E and hazardous wastes.

Table 16: Tonnages of Kent waste managed in permitted facilities within Kent and outside, and tonnages of other waste managed at Kent facilities 2022

Aspect	Flow	Total
Kent waste managed	Kent waste exported for management	-1,493,453
	Kent waste managed in Kent	4,939,6692
Managed in Kent	Waste imported into Kent	1,682,824

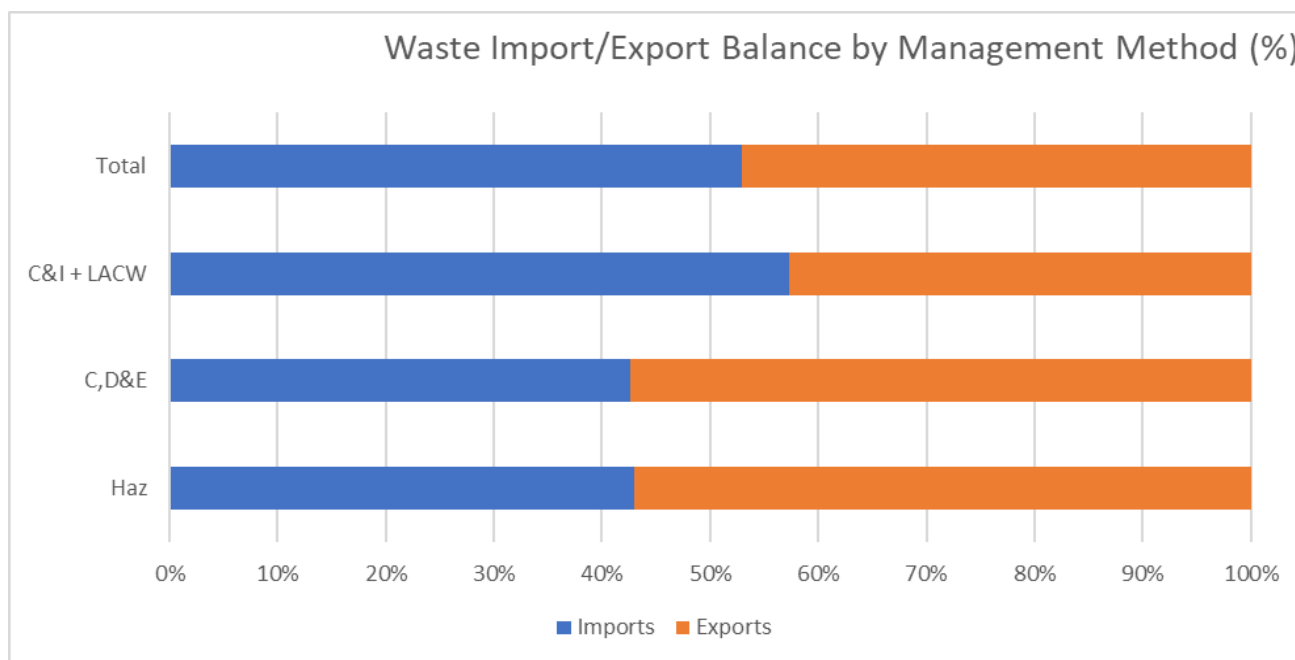
The bottom two lines of Table 16 above show that some 6.58 million tonnes of waste were reported as being managed at Kent waste management facilities in 2022. This compares with around 1.49 million tonnes being exported to be managed outside the county (top line of Table 16). As shown in the Table 16, this export is lower than the imports of waste for management from outside Kent so taking a simple balance, Kent’s net overall self-sufficiency appears to be¹⁸ imbalanced with slightly greater amounts being imported than exported. Though this is statistically the case, the degree of imbalance has improved since the AMR report for 2021-22 when 2.767mt of waste was imported and 1.845mt were exported, a ratio of 1:1.499 to the current ratio (2022) of 1:1.3 exports to imports. Figure 13a below and 13b overleaf graphically displays the 2022 import and export balance by management method and waste type (where known) that make up the overall tonnages set out above in Table 16 above.

Figure 13a: Waste Import and Export Balance in Kent 2022 by management method and waste type where known (tonnes)



¹⁸ This presents a crude approximation for annual monitoring purposes. Net self-sufficiency is actually a measure of arisings against consented capacity.

Figure 13b: Waste Import and Export Balance in Kent 2022 by management method and waste type where known (%)



Of the imports, just over 700,000 tonnes came from London, of which some 40,160 tonnes of non-hazardous residual waste arises from EfW incineration in 2022 and around 190,163 tonnes to non-inert landfill. In the long term, this movement is not consistent with the Plan’s provision for management of a reducing amount of waste from London. Moreover, while it should be noted that the non-hazardous waste capacity assessment¹⁹ that underpinned the Early Partial Review of the KMWLP in 2020 projected circa 55,000tpa of residual non-hazardous waste from London; the WDI data now shows this was exceeded in 2022 to 77,200 tonnes. It may be largely as a result of the Kemsley K3 EfW plant and the Ridham Dock Biomass Plant coming on stream and are now attracting greater waste inputs from London or out of county. Moreover, some 159,000 tonnes of waste went to permanent deposit to land as non-inert waste landfill and 18,000 tonnes of inert waste in 2022, giving a total of circa 177,000 tonnes. This compares favorably with a predicted requirement of up to 300,000tpa from London in previous waste needs assessment.

As a consequence of the updated Waste Needs Assessment of 2018 finding a projected shortfall in capacity for the management of inert waste and a surplus of EfW capacity, which is likely being utilised by London’s waste, it is clear that Kent can plan for a reducing provision for the management of London's waste over time. The data in 2022 appears to conflict with this to some extent, though this is a consequence of permitted capacity being more fully utilised, not that London’s wastes are set to be managed on an exportation strategy into the southeast area and Kent. Indeed, the Greater London Authority’s adopted London Plan 2011 is aiming at making London a zero-waste city, with a target by 2026 for no biodegradable or recyclable waste being sent to landfill (outside London) and by 2030 65% of London’s LACW is to be recycled. By 2031, the aim being to manage 100% equivalent of London’s waste. Kent’s Plan therefore is not in need of reversing the policy to reduce the amount of management provision for non-hazardous wastes from London. Certain specialist hazardous wastes, such as asbestos wastes, are expected to continue to be exported into Kent and the wider south east area. A list of permitted waste management facilities in Kent is set out in a separate list published alongside the AMR on the KCC website.

¹⁹ Kent Waste Needs Assessment 2018 Capacity Requirement for the Management of Residual Non Hazardous Waste September 2018 BPP Consulting

6. Summary of Monitoring the Delivery of the adopted KMWLP Strategy

In order to ensure that the monitoring of the adopted KMWLP (as amended by the Early Partial Review 2020) is based on up-to-date and relevant evidence, the County Council has monitored the KMWLP indicators for both waste capacity needs and for providing a steady and adequate supply of minerals. The relevant indicators are shown in the Kent Minerals and Waste Local Plan 2013-30 Monitoring Schedule: Sustainable Development Policies (see Section 8 Managing and Monitoring the delivery of the Strategy of the KMWLP).

Since the adoption of Minerals Sites Plan in 2020, recent monitoring data for aggregates in 2022 demonstrates that the aggregate landbank requirements included in Policy CSM2: Supply of land-won Minerals is no longer up to date. This is unsurprising as the rates of supply and level of reserves have changed since the Plan's partial review in 2020. However, the adopted policy recognises this and has inherent flexibility by stating:

*“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**”.*

In addition, the policy requirement to maintain an at least equivalent landbank of 7 years for sharp sand and gravels is caveated with “*while resources allow*”. Assessment of other relevant land-won mineral supply indicators undertaken to establish policy effectiveness show that the Plan's policies are still generally adequate for delivering the mineral supply strategy.

In addition, recent aggregate monitoring has again reaffirmed that the mineral transportation infrastructure safeguarding (wharfs and railheads) policy indicators are demonstrating that a review of these policies is unnecessary (CSM 6: Safeguarded Wharves and Rail Depots and CSM 7: Safeguarding Other Mineral Plant Infrastructure) as they remain effective in their safeguarding role.

The previously conducted early monitoring of the Plan's effectiveness in allowing for future waste management requirements indicated that several policies required review in that the policy requirements were no longer based on relevant data. As stated earlier, this was addressed by the Early Partial Review of several waste policies in 2020. Current 2022 monitoring again demonstrates the effectiveness of these policies in the Plan, save for a limited number of changes including a further reduction in the need to address London's wastes into the future.

The need to maintain overall net self-sufficiency in waste management (plus a reducing amount of London's waste) is part of the adopted Plan's overarching waste strategy. Import and export data (Table 16) demonstrates that in 2022 the balance was above the 10% of the indicator's trigger, at 11.3%. However, the greater inputs may be a consequence of available permitted capacity being taken up, as anticipated as London's drive to a net zero waste position is yet to be attained.

The data for LACW shows that the recycling/composting diversion targets in Policy CSW 4 of the adopted KMWL Plan (as amended by the Early Partial Review 2020) are yet to be met. These being 50% in 2021/22, no target for 2022/23 and then into the future at 2025/26 and 2030/31. The reason for this may well be due to less composable food waste entering the LACW stream as a proportion overall. The County Council's waste authority collection data on compostable materials is showing a proportional reduction year on year, with food waste significantly declining. This may be as a consequence of the current economic pressures of high inflation and low overall growth the UK is experiencing leading to less food being bought and less being 'wasted'. Legislation is in place for separate collections of food with weekly collections across the UK by 2026. Once this has been fully achieved, greater resolution in terms of the compostable elements of the LACW stream will be discernable to inform if any policy target modification is required. However, the landfill diversion target of less than 2% has been substantially exceeded in 2022/23. This demonstrates that overall, the LACW stream is being diverted from disposal to

higher elements of the waste hierarchy, including greater recovery, as the policy is designed to effect.

Ensuring the effectiveness of safeguarding policy requires Mineral Safeguarding Area (MSA) boundaries to be reviewed to ensure that where changes can be evidentially justified the MSA boundaries are updated. This is being addressed in the emerging KMWLP.

The available monitoring data indicates that the policies of the adopted Plan are considered generally effective. As a result of the statutory 5-year review, a degree of modification is proposed to policy and explanatory text to increase their relevance with regard to carbon neutrality, the circular economy, biodiversity and other changes arising from national policy. This, along with a 15-year plan horizon is set out in the emerging KMWLP 2024-39. Regulation 18 consultations for a modified KMWLP in this regard took place between 2021 and 2023.

7. Duty to Co-operate Activity

The AMR prepared by the Local Planning Authority (LPA) must contain details of the co-operation undertaken with other LPAs and the prescribed Duty to Co-operate (DtC) bodies²⁰. The Duty applies to all LPAs, councils and prescribed bodies and requires that they actively co-operate with each other to maximise the effectiveness with which development plans are prepared and implemented.

Whilst published outside of this AMR period, the Regulation 19 Public Consultation for the Pre-submission Draft of the Kent Minerals and Waste Local Plan 2024-39 sets out the details of the cooperative activity undertaken by the County Council for this AMR period and beyond. It can be viewed, amongst other documents, via the following link:

www.kent.gov.uk/mineralsandwaste .

In addition, Appendix 4 sets out the local plan allocations in Kent District and Borough Local Plans that have been subject to safeguarding assessment and that are exempt from further mineral or waste safeguarding consideration.

8. Conclusion and Next Steps

8.1 Mineral Indicator Monitoring

The **total aggregate** mineral sales in Kent during 2022 from all sources amounted to some 6.53mt up from the 6.47mt recorded in 2021. This was not a significant increase on the previous year. The reason for this may have been related to ongoing market concern due to the low growth in the economy since the uncertainty surrounding leaving the European Union in 2020. Limited growth in the economy, together with periods of no growth and persistent and relatively high inflation may have resulted in limited increases in aggregate demand. Continued monitoring will demonstrate whether sectors are changing and the implications for maintaining the overall supply.

The shift away from landwon supply to imports, with particular reference to the **sharp sands and gravels** continues. The landwon **sharp sand and gravels** continued to decrease from 0.20mt in 2021 to 0.12mt in 2022. Landwon **crushed rock** has showed historic significant extraction with 1.51mt being recorded in 2020. In 2021 this slightly decreased to 1.20mt and increased to 1.24mt in 2022. The data demonstrating that above 1.0mtpa level of extraction is the stable level of landwon sales. **Hard rock importation** fell back to 1.84mt in 2022, lower than the 2.21mt recorded in 2021. **Landwon sales of crushed rock were** historically confidential and did not allow for actual sales figures to be reported. They were assumed to be 0.78mtpa. This confidentiality has been waived by the operator allowing the sales and available reserves to be

²⁰ According to Regulation 34 (6) of The Town and Country Planning (Local Planning) (England) Regulations 2012

reported. The exact nature and quantity of the reserves (two sites Hermitage Quarry and Blaise Farm) were a matter of discussion with the operator in 2021-22. That and further aggregate monitoring has demonstrated that the total reserves of the landwon hard crushed rock at the end of 2022 was 14.85mt.

The **sharp sands and gravels importation (marine resources)** showed a significant contraction in 2019 (0.633mt), and then a marked recovery in 2020 (1.442mt) and again in 2021 at 1.644mt. They continued to increase with a recoded high of 1.906mt in 2022. The uncertainties in demand in 2019 appear to have been an 'exceptional event' and historic demand levels quickly re-established themselves and are now increasing. This may well be demonstrating that **landwon sharp sands and gravel supply** is being supplanted by importation. However, this illustrates the necessity for the safeguarding of wharf and rail depot capacity. This will be imperative to maintain the NPPF's requirement of a 'steady and adequate supply' of **sharp sand and gravel** to meet market requirements into the future.

The permitted reserves of **soft sand** at the end of 2022 were 5.574mt. The 10-year sales average trend is slightly increasing and the productive capacity has apparently decreased from 0.225mtpa to 1.045mtpa in 2022. The total **soft sand** requirements are 10.45mt. Reserves at the end of 2022 were 5.574mt and are forecast to be 5.099mt at the beginning of the Plan period (2024) (assuming a reduction at the 10-year sales average rate). This results in a shortfall of 2.15mt in the required landbank to the end of 2039 assuming the **soft sand** allocation in the Kent Minerals Sites Plan at Chapel Farm (West), Lenham (3.2mt) has come forward during the plan period to replenish the landbank. This could allow a 7-year landbank (of 3.324mt) to be maintained until 2036, resulting in a deficit estimated to be 2.15mt in 2039.

However, the estimate of available reserves and sales rates will likely change over time and there is the potential for the maintained **soft sand** landbank requirement to increase or decrease over time. As the landbank will be around 17.5 years at the start of the plan period (taking account of the Chapel Farm allocation being factored into the landbank), any increase in depletion rates will be revealed by annual aggregate monitoring well ahead of the landbank decreasing below 7 years, as anticipated in 2036. Moreover, it is anticipated that 'windfall' reserves of at least 0.84mt will come forward during the Plan period, reducing the attenuation of available supply during the latter Plan period to 2039. The requirement to review the policy of the Plan in five-year cycles enables the matter to be reassessed well ahead of any identified supply constriction and so it is considered that further allocation(s) of **soft sand**, at this time, are not justified.

In respect of **crushed rock**, the available reserves, coupled with a need to plan for the anticipated extended Plan period to 2039, would, by end of the Plan, result in a deficit of 17.38mt. This indicates that the sources of supply (two sites) are not sufficient to secure the ability of Kent to maintain a 10-year landbank of **crushed rock** over the life of the Kent MWLP 2024-39, as reflected in proposed Further Proposed Changes to KMWLP Policy CSM 2: Supply of Landwon Minerals in Kent. Further reserves will need to be secured either via an allocation or importation as the monitoring indicates that a 10-year landbank will only be maintained until an estimated 2034.

Secondary and recycled aggregate sales in 2022 decreased to 0.801mt from a historic high of 1.04mt in 2021. The 10-year sales average has increased from 0.81mtpa to 0.894mt. The **secondary and recycled aggregates**, however, have a probable long-term trend around the 0.80-1.00mtpa level and may now be showing a stable role in overall supply terms into the future. Given the 4.0mtpa available permitted capacity there is scope for increased production. Therefore, the market share of **secondary and recycled aggregate** of overall aggregate supply could significantly expand in response to economic trends as well as any further legislative changes to encourage their use.

The permitted **clay** and **brickearth** sites with remaining reserves in Kent have a combined landbank of 25-30 years, given a re-estimation of the expected yearly drawdown sales rate.

Kent has two operational **silica sand** sites, and the combined reserves meet the national policy requirement of maintaining a stock of permitted reserves of at least 10 years at established existing sites. One **silica sand** site (not one of the above) has been declared by the owner as containing un-viable reserves of **silica sand** and this was confirmed at the Examination of the KMWLP in 2015 and the Plan's subsequent adoption in 2016.

Kent's **chalk** reserves for cement manufacture are entirely contained at the strategic site at Holborough Cement works. Though not constructed, the implemented planning permission has sufficient supply at the planned extraction rate for 25 years. This meets the NPPF requirement where substantial new investment in a kiln is required.

Kent's **chalk** reserves for agriculture and engineering purposes are not required to meet any prescribed landbank level in the NPPF. The total reserves were estimated at over a million tonnes in 2019. More recent monitoring in 2021 has revealed this as an overestimate. In 2022 some 0.49 million tonnes constituted the permitted available reserves remaining in Kent.

Based on data for **chalk** reserves and sales in the period 2011- 2014 (that used a per annum proxy of 70,000tpa and a reserve of 1.516mt in 2014), it was found that by 2019 the estimated permitted reserves had dropped to 1.16mt. This gave an indicative permitted landbank of 16.57 years of **chalk** reserves in 2019. However, though available reserves have fallen to just 0.49 million tonnes, extraction was recorded in 2020 to be a mere 6,324 tonnes, giving a 100-year landbank. In 2021 this had slightly fallen to an 81+ year landbank. The 2022 sales data is incomplete and is estimated as a notional 6,000 tonnes. This would give a landbank life of 82 years. These estimated and actual recorded data conclusions demonstrate that the sector is highly variable in its response to market needs. The poor participation in AMR 2023 survey data complicates the conclusion of what quantities of reserves are needed to supply sufficient quantities of this mineral, as required by the NPPF. The adopted KMWLP is being reviewed and has an anticipated period to 2039. It is possible that further **chalk** reserves may be needed to meet this level of demand towards the end of the anticipated Plan period, however, on current data, it is not clear that this is a reliable conclusion. Further monitoring will demonstrate what is occurring in terms of this mineral's market and if further provision is necessary before the end of the anticipated Plan period.

8.2 Waste Indicator Monitoring

Arising of **LACW** in 2022/22 fell by 10.16% to just under 668,104 tonnes. This is generally consistent with 2018/19 which showed a negative rate of growth of minus 3.5%. While Kent's population is set on a growth path, there is an expectation that arisings will increasingly decouple from population growth, and while arisings of **LACW** are predicted to continue to grow over the Plan period, it was thought that this would be on a reduced rate. The forecast was that arisings would grow at a rate of 0.2% per annum to stand at around 740,000 tonnes in 2030/31 in the most recent WNA (waste needs assessments). The fall of 10.16% in 2022/23 suggest the rate of growth applied may need to be reassessed. However, it should be noted that the varying distribution of arisings across the county brings increased pressure on existing infrastructure in particular parts, and it is these which the Waste Disposal Authority (WDA) is seeking to address.

The **LACW** management profile data for 2022/23 shows that the waste recycling targets included in the Early Partial Review for the first milestone year of 2020/21 (there were none for 2021/22 and 2022/23) were not met in the recycling /composting category at 38.98%. This is thought to be due to a lowering of the compostable fraction (food waste in particular) in the overall collected **LACW** stream. This changes the proportionality of what can be compostable. The next horizon target date is 2025/26 with a recycling/composting target of 55%. Increased EfW recovery as a proportion of the total is a trend identified since 2018/19 and this is continuing. However, the remainder to landfill target of 2% was exceeded with 0.167% meeting this fate. The remainder of **LACW** managed through incineration via EfW is at 59.3% of the total.

Some 6.58 million tonnes of waste were reported as being managed at Kent waste management

facilities in 2022, some 0.42million tonnes lower than in 2021/22. This compares with around 1.49 million tonnes of Kent waste managed outside the county. This export is smaller than the waste imports (1.68 million tonnes), so taking a simple balance, Kent is not currently displaying a net self-sufficiency. Of the imports, just over 845,000 tonnes came from London, of which circa 40,000 tonnes went to EfW, and around 18,000 tonnes to non-inert landfill²¹ with circa 159,000 tonnes to non-hazardous landfill. These tonnages have increased since 2021/22. Further monitoring of changes from London will demonstrate if any policy change is required, given that it is still anticipated that waste inputs from London will decline over time as the adopted London Plan 2011 drive for net-self-sufficiency effects a reduction of imports into Kent.

Over the monitoring period there were numerous minor waste planning applications determined for such matters as temporary relaxation of hours of working, waste water site infrastructure changes, site access changes and variation of operating conditions. Only two applications were determined over the relevant period that changed Kent's waste management capacity with any significance. They included increased composting capacity from 245,000 to 290,000 tonnes per annum at an established site and the establishment of a new facility to process 150,000 tonnes per annum of **C,D & E** inert wastes to give rise to recycled aggregate products. These developments contribute towards a continued shift towards a more sustainable waste management profile.

²¹ It should be noted that the non hazardous waste capacity assessment underpinning the Early Partial Review of the KMWLP projected c55,000tpa of residual non-hazardous waste from London, which is close to the c50,000 tonnes reported for 2019.

Appendix 1: Permitted Quarries in Kent 2022

Site	Operator	Aggregate			Status
		Sand & Gravel	Soft Sand	Hard Rock	
Hermitage Quarry, Maidstone	Gallagher Aggregates Ltd	-	-	Yes	Active
Blaise Farm Quarry, West Malling	Hanson Aggregates Ltd	-	-	Yes	Active
Stone Castle Farm, Whetsted	Tarmac Ltd	Yes	-	-	Inactive
Lydd Quarry, Lydd	Brett Aggregates Ltd	Yes	-	-	Active ²²
Allens Bank, Lydd	Brett Aggregates Ltd	Yes	-	-	Inactive
Conningbrook Quarry	Brett Aggregates Ltd	Yes	-	-	closed
Denge Quarry, Lydd	Cemex UK	Yes	-	-	Active
Joyce Green Quarry, Dartford	Ingrebourne Valley Ltd	Yes	-	-	Inactive ²³
Aylesford Quarry, Aylesford	Aylesford Heritage Ltd	-	Yes	-	Active ²⁴
Addington Sand Pit (Wrotham Quarry)	Fern Aggregates	-	Yes	-	Active
Borough Green Sand Pit, Sevenoaks	Borough Green Sandpits Ltd	-	Yes	-	Active
Burleigh Farm, Charing	Brett Aggregates Ltd	-	Yes	-	Active ²⁵
Charing Quarry, Charing	Brett Aggregates Ltd	-	Yes	-	Inactive
Ightham sandpit (H&H Celcon)	H&H Celcon	-	Yes	-	Inactive
Lenham Quarry, Maidstone	Brett Aggregates Ltd	-	Yes	-	Active
Nepicar Sand Quarry, Wrotham	Nepicar Sand Ltd	-	Yes	-	Active
Greatness Farm, Sevenoaks ²⁶	Tarmac Ltd	-	Yes	-	Active

²² Extraction has moved into East Sussex, the processing of material and some reserves are within Kent in 2020

²³ Planning permissions to erect a new plan site and to extend the life of the extraction site until 2024 were granted planning permission subject to pre-commencement conditions in 2018, site is inactive as of 2022

²⁴ No off-site sales in 2018 of soft sand though actively extracting a sand and gravel-based material (Hoggin) for construction fill purposes

²⁵ Inactive in 2018, early 2019 became active

²⁶ The site also produces sharp sand and gravel, though predominantly soft sands from the Folkestone Formation

Appendix 2: Safeguarded Wharves and Rail Transportation Depots 2023

Site Name	Current Operator	Site Code in KMWLP 2013-30	Activity
Allington Rail Depot	Hanson UK	A	Inactive in 2020 for aggregate importation
Sevington Rail Depot	Brett Aggregates (UK) Ltd	B	Inactive for aggregate importation currently
Hothfield Works Rail Depot	Tarmac	C	Active
East Peckham Rail Depot	J. Clubb	D	Active for aggregate imports, PFA importation now occurring
Ridham Dock	Brett Aggregates (UK) Ltd & Tarmac	E	Active
Johnsons Wharf	Tarmac Ltd	F	Active
Robin's Wharf, Northfleet	Aggregate Industries (UK) & Brett Aggregates (UK) Ltd	G	Active
Clubbs Marine Terminal	J. Clubb	H	Active
East Quay, Whitstable	Brett Aggregates (UK) Ltd	J	Active
Red Lion Wharf	Stema Shipping Ltd	K	Active

Ramsgate Port	Brett Aggregates (UK) Ltd & Tarmac	L	Active
Dunkirk Jetty, Dover Western Docks ²⁷	Brett Aggregates (UK) Ltd	M	Re-activated now confirmed that the Western Docks redevelopment area will not intrude over this wharf site
Wharf 42, Northfleet (including Northfleet Cement Works)	Lafarge UK	N	No active for aggregate importation in 2023
Sheerness	Aggregate Industries	O	Inactive for marine aggregate importation
Northfleet Wharf	Cemex UK	P	Active
Old Sun Wharf	Fleetmix Ltd	Q	Inactive for marine aggregate importation

Appendix 3: List of Mineral sites that are included in Landbank Calculations in 2023

The table below sets out the permitted land-won mineral working sites in Kent included in landbank calculations that inform the policy modifications of the Full Review of the Kent Minerals and Waste Local Plan 2013-30 (as amended by the Early Partial Review 2020). Sites that have been inactive for more than 10 years are not included in the landbank calculations, though those that have been active during this period and are now being restored have been included; sites that were inactive or closed in 2022-23 are shown in *italics*.

Sites	Predominant Aggregate Type	Operator Details
1. Aggregate Minerals		
Hard Rock Hythe Formation (Ragstone)		
Hermitage Quarry, Maidstone	Crushed Rock	Gallagher Aggregates Ltd, Gallagher Group
Blaise Farm, West Malling	Crushed Rock	Gallagher Aggregates Ltd, Gallagher Group
River Terrace Alluvial and Sub-Alluvial Sand and Gravel		
<i>Stonecastle Farm, Whetsted</i>	<i>Sand and Gravel ('Sandstone' or 'Siltstone' sand and gravel)</i>	<i>Tarmac Ltd</i>
<i>East Peckham Quarry, East Peckham</i>	<i>Sand and Gravel ('Sandstone' or 'Siltstone' sand and gravel)</i>	<i>J.Clubb Ltd</i>
<i>Faversham Quarries, Faversham</i>	<i>Sharp sand and gravel</i>	<i>Brett Aggregates Ltd</i>
<i>Conningbrook Quarry, Ashford</i>	<i>Sharp sand and gravel</i>	<i>Brett Aggregates Ltd</i>
<i>Highstead Quarry, Chislet</i>	<i>Sharp sand and gravel</i>	<i>Brett Aggregates Ltd</i>
<i>Darenth & Joyce Green Quarry, (Darenth Court) Dartford</i>	Sharp (flint) sand and gravel	<i>J.Clubb Ltd</i>
Joyce Green Quarry, Dartford	Sharp (flint) sand and gravel	Ingerbourne Valley Ltd
Storm Beach Sand and Gravel		
Lydd Quarry (Scotney Court Farm), Lydd	Sharp (flint) sand and gravel	Brett Aggregates Ltd
Denge Quarry, Lydd	Sharp (flint) sand and gravel	Cemex UK
<i>Allens Bank, Lydd</i>	<i>Sharp (flint) sand and gravel</i>	<i>Brett Aggregates Ltd</i>
Folkstone Formation Soft Sand		
<i>Aylesford Quarry, Aylesford</i>	<i>Building Sand</i>	<i>Aylesford Heritage Ltd</i>
Borough Green Sandpit, Wrotham	Building Sand	Borough Green Sandpits Ltd
Charing Quarry-Burleigh Farm Extension, Charing	Building Sand	Brett Aggregates Ltd

Lenham Quarry, Lenham	Building Sand	Brett Aggregates Ltd
<i>Ightham Sand Pit, Sevenoaks</i>	<i>Building Sand</i>	<i>H&H (UK) Ltd</i>
Wrotham Quarry (Addington Sand Pit), Wrotham	Building Sand	Fern Aggregates, Ferns Group UK
2. Industrial Minerals		
Silica (Industrial) Sand		
Nepicar Sand Pit, Wrotham	Silica Sand	Nepicar Sand Ltd
Wrotham Quarry (Addington Sand Pit), Wrotham	Silica Sand	Fern Aggregates, Ferns Group UK
<i>Ightham Sandpit</i>	<i>Silica Sand</i>	<i>H & H UK Ltd</i>
Brickearth and Brickclay		
Babylon Tileworks, Tonbridge	Clay	Mr. M Gash
<i>Orchard Farm, Sittingbourne</i>	<i>Brickearth</i>	<i>Wienerberger UK Ltd</i>
Paradise Farm, Sittingbourne	Brickearth	Wienerberger UK Ltd
Clay (engineering)		
Norwood Quarry, Isle of Sheppey	Clay	FCC Environmental (UK) Ltd
Chalk (cement)		
<i>Medway Works , Holborough</i>	<i>High purity chalk for cement</i>	<i>LaFarge Cement UK</i>
Chalk (agricultural and use in other construction and industrial applications)		
<i>Darenth road Quarry, Dartford</i>	<i>Chalk</i>	<i>J. Clubb Ltd</i>
Pinden Quarry, Dartford	Chalk	Pinden Ltd
Beacon Hill Quarry, Ashford	Chalk	JKS Group Ltd
Crundale Quarry, Ashford	Chalk	Mr. C Peach
Hegdale Quarry, Ashford	Chalk	R H Ovenden Ltd
Rowling Quarry, Dover	Chalk	R H Ovenden Ltd

Appendix 4: Safeguarding Considerations - Local Plan allocations in Kent

The table below sets out the adopted local plan allocations for development that have been the subject of safeguarding considerations and, for the period of the local plan in question, are exempt from further mineral or waste consideration against the exemption criteria of the following Kent Minerals and Waste Local Plan (KMWLP) policies:

- **Policy DM 7: Safeguarding Mineral Resources**
- **Policy DM 8: Safeguarding Mineral Management, Transportation, Production & Waste Management Facilities**

Or, conversely those that contain development allocations that are still subject to the presumption to safeguard land-won minerals, mineral importation, handling and transportation and waste management facilities as set out in the following KMWLP policies:

- **Policy CSM 5: Land-won Mineral Safeguarding**
- **Policy CSM 6: Safeguarded Wharves and Rail Depots**
- **Policy CSM 7: Safeguarding Other Mineral Plant Infrastructure**
- **Policy CSW 16: Safeguarding of Existing Waste Management Facilities**

Administrative Area and Local Plan	Allocation Exemption Justification (where relevant)	Within Urban Area	Exempt Allocations	Safeguarded Minerals and/or Waste Management and Minerals Mineral Management, Transportation, Production Facilities and other Relevant Information
Ashford Borough Council Ashford Local Plan to 2030 (adopted 2019)				The area has significant and important deposits of the Folkestone Formation. Other important safeguarded land-won minerals present are Limestone-Hythe Formation and the Sandgate Formation. The area also has some Sub-Alluvial River Terrace Deposits and Brickearth (Other Areas-Ashford, Canterbury, Dover, Folkestone and Hythe). In addition, the area has specialist building stone minerals including the Tunbridge Wells Sand Formation, Wadhurst Clay Formation, Ashdown Formation, and Paulinda Limestone. In addition, there are important safeguarded mineral importation (Site B: Sevington Rail Depot, Site C: Hothfield Works),

				handling, processing infrastructure and safeguarded waste management facilities in the area
Allocations that lie either within an existing built-up area or are existing allocations in the previous Development Plan and were therefore exempt from safeguarding by virtue of criterion 7 of Policy DM 7 of the KMWLP		Y	S1	River Terrace deposits
		Y	S7	Sub-Alluvial River Terrace deposits
		Y	S8	Sandstone (Sandgate Formation)
		Y	S9	Sandstone (Sandgate Formation)
		Y	S10	Sub-Alluvial River Terrace deposits
		Y	S11	Sub-Alluvial River Terrace deposits
		Y	S11a	River Terrace deposits
			S15	Sub-Alluvial River Terrace deposits
			S16	Sub-alluvial river terrace deposits and Limestone (Hythe Formation – Kentish Ragstone)
			S17	Sub-alluvial river terrace deposits and Sandstone (Sandgate Formation and Folkestone Formation)
			S19	Sandstone (Folkestone Formation)
			S20	Sub-Alluvial River Terrace deposits and Sandstone (Sandgate Formation and Folkestone Formation)
			S21	Sub-Alluvial River Terrace deposits and Limestone (Hythe Formation – Kentish Ragstone)
		Y	S22	Sub-Alluvial River Terrace deposits
		Y	S23	Sub-Alluvial River Terrace deposits and Sandstone (Sandgate Formation and Folkestone Formation)
			S24	Sandstone (Wadhurst Clay Formation)
		Y	S26	Sandstone (Wadhurst Clay Formation)
			S29	Sub-Alluvial River Terrace deposits
			S32	Sub-Alluvial River Terrace deposits
			S37	River terrace deposits
	Y	S38	Sandstone (Folkestone Formation)	
Due to the nature of the particular mineral			S4	Limestone (Wealden Clay

being safeguarded and the availability/ demand for these resources, the sites were allocated without the need for a prior Minerals Assessment, exemption criteria 1, 2 or 5 of Policy DM 7 of the KWMLP applied			Formation)
		S25	Sandstone (Wadhurst Clay Formation)
		S30	Limestone Hythe Formation (Kentish Ragstone)
		S43	Sandstone (Tunbridge Wells Sand Formation)
		S51	Limestone Hythe Formation (Kentish Ragstone)
		S59	Limestone Hythe Formation (Kentish Ragstone)
		S60	Tunbridge Wells Sandstone Formation
		S4	Limestone (Wealden Clay Formation)
		S25	Sandstone (Wadhurst Clay Formation)
		S30	Limestone Hythe Formation (Kentish Ragstone)
		S43	Sandstone (Tunbridge Wells Sand Formation)
		S51	Limestone Hythe Formation (Kentish Ragstone)
Given the small size of the allocations themselves and/or the proportion of the allocation covered by the MSA, the sites were allocated without the need for a prior Minerals Assessment based on exemption criteria 1 or 2 of Policy DM 7 of the KMWLP		S5	Sub-Alluvial River Terrace deposits
		S14*	Sub-Alluvial River Terrace deposits *In proposed allocation S14 (Park Farm South East), the MSA covers the area of the allocation that lies within the 100 year floodplain and therefore would lie outside the developable footprint of the proposed dwellings there.
		S28	Sub-Alluvial River Terrace deposits
		S35	Sub-Alluvial River Terrace deposits
		S44	Sandstone (Folkestone Formation)
		S56	Sub-Alluvial River Terrace deposits
		S61**	Sandstone Ashdown Formation **Proposed allocation S61 just clips the MSA, the

				boundary of which is coterminous with the Ancient Woodland that bounds S61 to the north
	Given the accepted strategic importance of the site for non-mineral development, the parties agreed that the presumption to safeguard the landwon mineral from sterilisation could be set aside by exemption criteria 3 or 5 of Policy DM7 of the KMWLP		S2	Sandstone (Folkestone Formation)
	Given the small scale of the site, the parties agree that this may be adequately addressed by inserting an additional clause into policy S34 as follows: - <i>'Prior to the grant of planning permission for non-minerals development at the site, the applicant shall prepare and submit a Minerals Assessment to establish whether any prior extraction of Minerals should take place in advance of residential development'</i>		S34	Sandstone (Folkestone Formation)
	Given the site was not expected to come forward for housing development until the adjoining site [S14] is developed out, it was reasonable to expect a Minerals Assessment in advance of a grant of planning permission for the residential development to be undertaken to satisfy Policy DM7 of the KMWLP.		S45	Sub-Alluvial River Terrace deposits

	<p>Therefore, the parties agree that this may be adequately addressed by inserting an additional clause into policy S45 as follows:</p> <p>-</p> <p><i>‘Prior to the grant of planning permission for non-minerals development at the site, the applicant shall prepare and submit a Minerals Assessment to establish whether any prior extraction of Minerals should take place in advance of residential development’</i></p>			
	<p>The parties agreed that, on balance, the weight of material considerations including the potential impact on housing land supply and the potential impact from excavation activities on the commercial operations at the Banyan Retreat premises, the presumption to safeguard the landwon mineral from sterilisation could be set aside by exemption criteria 3 or 5 of Policy DM 7 of the KMWLP</p>		S47	Sandstone (Folkestone formation)
	<p>The parties agreed that, on balance, the weight of material considerations including the potential impact on housing land supply the presumption to safeguard the landwon mineral from sterilisation could be set aside by exemption criteria 3</p>		S48	Sandstone (Folkestone Formation) plus small part as sub-alluvial river terrace deposits

	or 5 of Policy DM 7 of the KMWLP.			
	The parties agreed that, on balance, the weight of material considerations including the potential impact on housing land supply and the potential impact from excavation activities on the commercial operations at the Banyan Retreat premises, the presumption to safeguard the landwon mineral from sterilisation could be set aside by exemption criteria 3 or 5 of Policy DM 7 of the KMWLP.		S49	Sandstone (Folkestone Formation)
	The size of the residential allocation makes this an important, strategic allocation for the rural part of the borough. The relatively small scale of the potential mineral deposit and its location adjacent to existing residential properties means that, on balance, the parties agreed the weight of material considerations including the potential impact on housing land supply and the potential impact from excavation activities on the residential amenity of neighbouring residential occupiers, the presumption to safeguard the landwon mineral from sterilisation could be set aside by exemption criteria 3 or 5 of Policy DM 7 of the KMWLP.		S55	Sub-Alluvial River Terrace deposits
Administrative	Allocation	Within	Exempt	Safeguarded Minerals

Area and Local Plan	Exemption Justification (where relevant)	Urban Area	Allocations	and/or Waste Management and Minerals Mineral Management, Transportation, Production Facilities and other Relevant Information
<p>Canterbury City Council</p> <p>Canterbury District Local Plan (adopted July 2017)</p>	<p>The adopted Local Plan has both land-won safeguarded minerals and minerals and waste management safeguarded infrastructures within its area</p>		None	<p>The presence of any safeguarded minerals and/or safeguarded facilities were not formally considered when the allocations of the plan were formulated, examined and adopted. Therefore, any development proposals arising in the Plan's allocations that have safeguarding issues are not exempt by any criteria of Policy DM 7 or DM 8 of the Kent Minerals and Waste Local Plan 2013-30 (as partially Reviewed 2020)</p>
<p>New Canterbury Local Plan to 2040</p>	<p>This is Local Plan is in its early stages of formulation with consultations on preferred options for growth, town center strategies, housing and communities, employment and local economy, local facilities, transport, historic and natural environment and sustainability appraisal</p>		N/A	<p>Both local authorities are in early discussions to consider potential safeguarding issues. Safeguarded resources relate to Brickearth (Other Areas-Ashford, Canterbury, Dover, Folkestone and Hythe) and Sub-Alluvial River Terrace deposits. The area also has safeguarded waste management infrastructure (non haz-landfill) and important safeguarded mineral importation (Site J: East Quay, Whitstable) facilities</p>

<p>Dartford Borough Council</p> <p>Core Strategy (adopted 2011)</p> <p>Development Policies Plan (adopted 2017)</p> <p>Stone Neighbourhood Development Plan (adopted July 2022)</p>	<p>The adopted Core Strategy area plan has both land-won safeguarded minerals and minerals and waste management safeguarded infrastructures within its area</p> <p>The adopted Development Policies Plan addresses development management matters unrelated to any minerals and waste safeguarding</p> <p>The neighbourhood plan addresses the urban planning issues as they apply to the settlement of Stone, and is unrelated to any minerals and waste safeguarding requirements in the wider borough area</p>		<p>None</p> <p>None</p> <p>N/A</p>	<p>The County and Borough planning authorities are in discussion to ensure that future local plans for the area will ensure that minerals and waste safeguarding requirements are addressed in allocation assessment. The borough area has River Terrace and Sub-Alluvial River Terrace deposits and safeguarded waste management capacity (including hazardous landfill) infrastructure and important mineral importation (Site F: Johnsons Wharf) facilities</p>
<p>Dover District Council</p> <p>Core Strategy (adopted 2010)</p> <p>Land Allocations Plan (adopted 2015)</p>	<p>The adopted Core Strategy area plan has both land-won safeguarded minerals and minerals and waste management safeguarded infrastructures within its area. The strategic allocation at Dover western Docks affects a mineral importation facility</p> <p>The adopted Land Allocations Plan identifies development areas within the</p>		<p>None</p> <p>None</p>	<p>The presence of any safeguarded minerals and/or safeguarded facilities were not formally considered when the allocations of the plan were formulated, examined and adopted. Therefore, any development proposals arising in the 2010 and more specifically the 2015 Land Allocations Plan's allocations that have safeguarding issues are not exempt by any criteria of Policy DM 7 or DM 8 of the Kent Minerals and Waste Local Plan 2013-30</p>

<p>Worth Neighbourhood Plan (adopted 2015)</p> <p>Ash Neighbourhood Plan (adopted 2021)</p> <p>Review of the adopted Core Strategy for a Local Plan to 2040</p>	<p>defined urban limits of the settlements of the district. The impact on land-won minerals is therefore irrelevant as they are, where they occur, are exempt. With regard to any waste management facility, such as Dover Waste Recycling facility, the plan does not explicitly consider safeguarding exemptions</p> <p>The neighbourhood plan addresses the urban planning issues as they apply to the settlement of Worth, and is unrelated to any minerals and waste safeguarding requirements in the wider borough area</p> <p>The neighbourhood plan addresses the urban planning issues as they apply to the settlement of Ash, and is unrelated to any minerals and waste safeguarding requirements in the wider borough area</p> <p>Regulation 18 Public Consultation in early 2021</p>		<p>N/A</p> <p>N/A</p> <p>NA</p>	<p>(as partially Reviewed 2020)</p> <p>The District and County planning authorities have been in discussion to ensure that the future local plan for the area (the emerging Dover Local Plan to 2040) will ensure that minerals and waste safeguarding requirements are addressed in allocation assessment. The district area has River Terrace, Brickearth (Other Areas-Ashford, Canterbury, Dover, Folkestone and Hythe) and Storm beach gravel and safeguarded waste management infrastructure and important safeguarded mineral importation facilities (Site M: Dunkirk Jetty, Dover Western Docks)</p>
<p>Folkestone and Hythe District Council</p> <p>Folkestone and Hythe & Places and Policies (adopted 2020)</p>	<p>The adopted Folkestone and Hythe & Places and Policies plan has both land-won safeguarded minerals and minerals and waste management safeguarded infrastructures within</p>	<p>None</p>		<p>The area has significant and important deposits of the Folkestone Formation and highly protected land designations (in addition to land-won mineral safeguarding) containing Storm beach deposits. Other important safeguarded land-won</p>

<p>Core Strategy Review 2022 (adopted 2022)</p>	<p>its area.</p> <p>The adopted Core Strategy addresses the future (to 2037) strategic needs of the area. In so doing it defines several strategic allocations. New Garden Settlement of Otterpool in the North Downs Area as both land-won safeguarded minerals and minerals and waste management safeguarded infrastructures within its area</p>	<p>None</p>		<p>minerals are Limestone-Hythe Formation and the Sandgate Formation. The area also has some Sub-Alluvial River Terrace Deposits and Brickearth (Other Areas-Ashford, Canterbury, Dover, Folkestone and Hythe). The area has important safeguarded waste management capacity infrastructure</p> <p>Though not an allocation exempt from the presumption to safeguard the land-won minerals and waste management capacity features according to policies CSM 5, 6 and CSW 16, the County Planning Authority and the District Planning Authority are in discussion regarding safeguarding considerations.</p>
<p>Gravesham Borough Council</p> <p>Gravesham Local Plan Core Strategy (adopted 2014) and Gravesham Local Plan Core Strategy-Policies Map (adopted 2014)</p>	<p>This plan identifies several key 'opportunity' areas that are key to the regeneration of the area's waterfront to the river Thames (Northfleet Embankment). These areas have several important mineral importation wharfs that are safeguarded. Reference is made to retention of the mineral importation activity at Red Lion Wharf (sub-area 1.8) and the recognition of bulk aggregates importation being permitted at Wharf 42 (sub-are 1.5), Old Sun Wharf (sub-area 1.10) is not recognised as a 'potential' and thus</p>	<p>None [the formal process of infrastructure assessment and exemption testing with Policy DM 8 did not occur in 2014] though the matter was considered at the Examination in Public in 2015 of the KMWLP</p>	<p>Y</p>	<p>The rural area of the Borough contains safeguarded land-won minerals. Significantly the Sub-Alluvial River Terrace Deposits and River Terrace Deposits that mainly occur in the protected Stone and Higham marshes areas to the east of the defined urban area. Therefore, the main element of safeguarding within the Borough area are mineral importation infrastructure. The matter of their safeguarding, in terms of their allocation in the local plan as being prior to the adoption of the KMWLP was considered by the Inspector into the KMWLP in 2015. It was stated:</p> <p><i>166. An additional site "Old</i></p>

	<p>protected wharf in Policy CS03.</p>		<p><i>Sun Wharf</i> is to be added to the list under MM5/9A. Though there is no wharf on this site at present, permission has in the past been granted for the construction of a maritime jetty for the importation of sand and stone by river. That permission expired in February 2015 without the jetty having been constructed. Nonetheless, the site must be regarded as having potential under the provisions of the NPPF. It would not be sound to exclude it. Another site "Red Lion Wharf" is retained in the list, despite reservations from some representors. That wharf has permission for full port operational use and is only conditioned for aggregate use. It too falls within the NPPF expectations of safeguarding; and similarly, it would not be sound to exclude it.</p> <p>1.67. Both sites lie within a key regeneration site identified in Gravesham Borough Council's Core Strategy (Policy CS03). I recognise that their safeguarding could have implications for the successful implementation of the regeneration strategy. But "new" Policy DM 8 [MM7/3A] (consistent with the proposed modification to "new" Policy DM 7 in relation</p>
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<p>Local Plan Review</p>	<p>The Plan has, as required by the NPPF, commenced its statutory review process. Policy CS03 is not listed as requiring 'no modification'</p>	<p>N/A</p>	<p><i>to minerals safeguarding) includes an exception to the general presumption of safeguarding from incompatible development in the case of a site that has been allocated in the adopted development plan. Thus, the safeguarding of these sites will not be prejudicial to the regeneration strategy.</i></p> <p>All the mineral importation wharfs in the borough area remain safeguarded (Site G: Robins Wharf, Site H: Clubbs Marine Terminal, Site K: Red Lion Wharf, Site N: Wharf 42, Northfleet, Site P: Northfleet Wharf and Site Q: Old Sun Wharf) and subject to adopted safeguarding policy of the KMWLP at this time.</p>
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Maidstone Borough Council				
Maidstone Borough Local Plan 2011-2031 (adopted 2017)	<p>The plan identifies several allocations that are coincident with safeguarded land-won minerals that occur in the borough. A Joint Position Statement (JPS) was drafted but not concluded between the authorities, but was overridden by the Inspector into the plan's Independent Examination (ongoing in 2016) to exempt all allocations that were coincident with the safeguarded Limestone-Hythe Formation and Sandgate Formation from further mineral safeguarding consideration</p>	<p>Allocations where exemption applies are: H1 (2), (11), (17), (30), (31), (32), (33), (34), (35), (37), (45), (46), (47), (48), (51), (65), H2 (2), RMX (1), RMX (4), EMP1 (2), EMP1 (5)</p>		<p>The area contains important safeguarded deposits of aggregate forming minerals. Including Sub-Alluvial River Terrace Deposits and River Terrace Deposits, the Folkestone Formation (including an allocation in the KMSP), Limestone-Hythe Formation and the Sandgate Formation. In addition, the area has specialist building stone mineral Paulinda Limestone. There is also important mineral importation (Site A: Allington Rail Depot) handling, processing and transportation and safeguarded waste management facilities in the area</p>
North Loose Neighbourhood Plan 2015-2031 (adopted 2016)	<p>The neighbourhood plan addresses the urban planning issues as they apply to the settlement of North Loose, and is unrelated to any minerals and waste safeguarding requirements in the wider borough area</p>	N/A		
Staplehurst Neighbourhood Plan 2016-2031 (adopted 2020)	<p>The neighbourhood plan addresses the urban/rural planning issues as they apply to the settlement of Staplehurst, and is unrelated to any</p>	N/A		

<p>Loose Neighbourhood Plan 2018-2031 (adopted 2019)</p>	<p>minerals and waste safeguarding requirements in the wider borough area</p> <p>The neighbourhood plan addresses the urban/rural planning issues as they apply to the settlement of Loose, and is unrelated to any minerals and waste safeguarding requirements in the wider borough area</p>	<p>N/A</p>		
<p>Marden Neighbourhood Plan 2017-2031 (adopted 2020)</p>	<p>The neighbourhood plan addresses the urban/rural planning issues as they apply to the settlement of Marden, and is unrelated to any minerals and waste safeguarding requirements in the wider borough area</p>	<p>N/A</p>		
<p>Boughton Monchelsea Neighbourhood Plan (adopted 2021)</p>	<p>The neighbourhood plan addresses the urban/rural planning issues as they apply to the settlement of Boughton Monchelsea, and is unrelated to any minerals and waste safeguarding requirements in the wider borough area</p>	<p>N/A</p>		
<p>Lenham Neighbourhood Plan 2017-2031 (adopted 2021)</p>	<p>The neighbourhood plan addresses the urban/rural planning issues as they apply to the settlement of Lenham, and is unrelated to any minerals and waste safeguarding requirements in the wider borough area</p>	<p>N/A</p>		

<p>Otham Neighbourhood Plan 2020-2035 (adopted 2021)</p> <p>Local Plan Review 2022</p>	<p>The neighbourhood plan addresses the urban planning issues as they apply to the settlement of Otham, and is unrelated to any minerals and waste safeguarding requirements in the wider borough area</p> <p>Regulation 19 Submission Plan consultation has been completed. The plan identifies significant growth in the proximity of Lenham and affects both permitted reserves of aggregates (Folkestone Formation) an allocation in the Kent Mineral Sites Plan (KMSP) and for further supply of this mineral and safeguarded deposits of this mineral in the locality</p>	<p>N/A</p> <p>None. A Statement of Common Ground (SoCG) is being finalised to ensure that the local Plan allocation does not compromise the supply of this important mineral from permitted reserves, the allocation in the KMSP and safeguard deposits</p>	
<p>Sevenoaks District Council</p> <p>Core Strategy (adopted 2011)</p> <p>Allocations and Development Management Plan (adopted 2015) to be read alongside the Interactive Policies Map</p>	<p>The plan sets of the spatial vision and objectives for the issues facing the district. The plan is silent on minerals and waste safeguarding matters</p> <p>The plan sets out the policy background for allocations for development to occur in the district area to deliver the Core Strategy. The plan is silent on minerals and waste safeguarding matters</p>	<p>N/A</p> <p>None</p>	<p>The area contains important safeguarded deposits of aggregate forming minerals. Including Sub-Alluvial River Terrace Deposits and River Terrace Deposits, the Folkestone Formation, Limestone-Hythe Formation. In addition, the area has specialist building stone minerals including the Upper Tunbridge Wells Sand Formation, Ashdown Formation, Ardingly Sandstone and Cuckfield Stone Bed. In addition, there are important safeguarded mineral quarrying handling, processing and waste management (non haz-</p>

<p>An emerging new Local Plan is currently being progressed with an updating of the necessary evidence base (July 2022)</p>	<p>A SoCG was prepared and concluded in 2019. To ensure that minerals and infrastructure assessments were to be required as part of any subsequent planning application where minerals or waste management safeguarding issues had been identified. This will be updated once the emerging Local Plan has been progressed such that allocations and their safeguarding issues are identified accordingly</p>			landfill) facilities in the area
<p>Sevenoaks Town Neighbourhood Plan (unadopted 2022)</p>	<p>The neighbourhood plan will address the urban planning issues as they apply to the settlement of Sevenoaks, and is unrelated to any minerals and waste safeguarding requirements in the wider borough area</p>	N/A		
<p>Swale Borough Council</p> <p>Swale Borough Local Plan (adopted 2017)</p>	<p>The plan sets out the policies for the strategy to deliver sustainable development in Swale to 2031. In doing so it not only sets out the core objectives in growth terms but also the allocations for development. Where they are coincident with any safeguarded minerals the policy makes reference to the need to address</p>	None		<p>The area contains important safeguarded deposits of aggregate forming minerals. Including Sub-Alluvial River Terrace Deposits and Brickearth. In addition, there are important mineral quarrying and waste management safeguarded facilities in the area, including hazardous landfill, recycling and recovery operations. In addition, safeguarded mineral importation (Site O: Sheerness, Site E: Ridham Dock) and processing infrastructure is present</p>

<p>Swale Local Plan Review (Issues and Options consultation 2021)</p>	<p>the matter with a Minerals Assessment</p> <p>The review is anticipated to plan to 2038. The Issues and Options consultation identified, where relevant, the need to undertake MA to establish if the proposed allocation can be exempt from further mineral safeguarding.</p> <p>A further consultation (under Regulation 19) is anticipated in 2022.</p>	<p>N/A</p>		
<p>Thanet District Council</p> <p>Thanet District Council Local Plan (adopted 2020)</p> <p>Thanet Local Plan Update (2022)</p>	<p>The plan sets out the policy background for allocations for development to occur in the district area to deliver the sustainable development to 2031. The plan is silent on minerals and waste safeguarding matters</p> <p>Partial update of the Local Plan in progress with a view to publish a draft plan in 2022</p>	<p>None</p> <p>N/A</p>		<p>The district area has almost no safeguarded mineral deposits, that which exists (Sub-Alluvial River Terrace Deposits) is entirely within the defined urban area at Birchington and is therefore exempt from land-won mineral safeguarding considerations. The area has important safeguarded mineral importation processing and transportation infrastructure (Site L: Ramsgate Port) and a number of important waste management sites that collectively make up a significant component of the County's waste safeguarded recycling and recovery capacity</p>
<p>Tonbridge and Malling Borough Council</p> <p>Core Strategy (adopted in 2007) to be read alongside the Local Plan</p>	<p>The Core Strategy sets out the vision and core policies to create the sustainable</p>	<p>None</p>		<p>The Borough area contains important safeguarded deposits of aggregate forming minerals. Including Sub-Alluvial River Terrace Deposits and River Terrace</p>

<p>Proposals Map</p> <p>Development Land Allocations (Supplementary Planning Document adopted 2008)</p> <p>Tonbridge Central Area Action Plan (adopted 2008)</p> <p>Managing Development and the Environment (Development Plan Document adopted 2008)</p>	<p>communities in the borough to 2022. It acknowledges the policies of the KMWLP. It sets out the locations of strategic sites required by the vision, minerals and waste safeguarding is not considered</p> <p>The document sets out the allocations for development to realise the Core Strategy. It sets out the locations of the allocation sites required by the Core Strategy vision, minerals and waste safeguarding is not considered</p> <p>The action plan addresses the urban planning issues as they apply to the settlement of Tonbridge (Central Area), and is unrelated to any minerals and waste safeguarding requirements in the wider borough area</p> <p>The document sets out the development management policies that would be applicable to the determination of any planning applications at the allocated sites. The document is silent on minerals and waste safeguarding requirements</p>	<p>None</p> <p>None</p> <p>None</p>		<p>Deposits (including one allocation in the KMSP), the Folkestone Formation, Limestone-Hythe Formation and the Sandgate Formation. In addition, there are important mineral handling, processing and transportation (Site D : East Peckham rail depot) and waste management safeguarded facilities in the area.</p>
<p>Tunbridge Wells Borough Council</p>				<p>The Borough area contains</p>

Local Plan (adopted 2006) and Local Plan Proposals Maps	The plan set out the policies for growth and conservation of the Borough. Now largely superseded by the more recent plan documents. The document is silent on minerals and waste safeguarding requirements	None	safeguarded deposits of aggregate forming minerals, including Sub-Alluvial River Terrace Deposits and River Terrace Deposits (including an allocation in the KMSP). Significant to the borough area is the very extensive coverage of safeguarded specialist building stone minerals including, and predominantly, the Upper Tunbridge Wells Sand Formation, and to a lesser extent the Tunbridge Wells Sand Formation, Ashdown Formation, Ardingly Sandstone, Wadhurst Clay, Pauldina Limestone and the Cuckfield Stone Bed. In addition, there are important mineral quarrying (Stonecastle Farm Quarry at Hadlow) and waste management (such as the North Farm Waste Recycling Facility) safeguarded facilities in the area.
Core Strategy (adopted 2010) to be read alongside the Local Plan Proposals Maps	The plan sets out where development will occur that is concurrent with the overarching principles of what the area needs to develop sustainably, according to a spatial vision and the strategic objectives as set out in the document. The document is silent on minerals and waste safeguarding requirements	N/A	
Site Allocations Local Plan (adopted 2016)	The plan details the specific locations of site allocations for development and how they were evidentially assessed for appropriate suitability and arrived at. The document is silent on minerals and waste safeguarding requirements	None	
New Local Plan (unadopted)	This plan has a timeline to 2038 and has reached Independent Examination stage in 2022. Adoption is anticipated in early 2023. The plan, like earlier plan documents sets out the special vision and policy framework to enable the areas	None. A comprehensive SoCG was agreed between the authorities that expanded upon the minerals and waste safeguarding matters as relevant to the	

<p>Neighbourhood Plans</p> <ul style="list-style-type: none"> • Benenden • Brenchley and Matfield • Capel • Cranbrook and Sissinghurst • Goudhurst • Hawkhurst • Horsmonden • Lamberhurst • Pembury • Sandhurst 	<p>sustainable growth to be realised. The plan does acknowledge the existence of the KMWLP and the need to address minerals and waste safeguarding where relevant in the area at, or proximate to, specific allocations where relevant when applications are being determined</p> <p>The various neighbourhood plans address the urban/rural planning issues as they apply to the settlements detailed, and are unrelated to any minerals and waste safeguarding requirements in the wider borough area</p>	<p>borough area.</p> <p>N/A</p>		
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Appendix 5: Letter from SEEAWP Secretariate: Local Aggregate Assessments 2022 (data)**SEEAWP**

South East England Aggregates Working Party

Technical Secretary: Richard Read BA. MRTPI19 December
2023**Address:** c/o Spatial Planning, Hampshire 2050 Hampshire County
Council, 3rd Floor, EII Court South, Winchester, Hampshire,
SO23 8UHDear SEEAWP
member**Tel:** 07786977547 **Email:** readplanning@btinternet.com**Draft Local
Aggregate
Assessments
2022****South East England MPAs**

Via Email

Thank you for
referring your
authority's draft

Local Aggregate Assessment (LAA) to SEEAWP.

The LAAs were considered by SEEAWP on the 7th December 2023 and the abstract from the draft Minute is below.

Some general points were discussed about the LAAs and these are mentioned in the draft Minute. It is left to individual MPAs to consider these as appropriate.

There are some points concerning the consideration of aggregates' imports and exports in an MPA's LAAs. As next year data from the National Collation of AM 2023 Surveys should be available MPAs could be in a better position to consider these then.

I look forward to receiving the final version of the LAA so the SEEAWP secretariat has an up to date record. Additionally, DLUHC would like to receive a copy of this, preferably at the end of the year, so please send them a copy as well.

Yours sincerely,

Richard Read
SEEAWP Technical Secretary

Abstract from the draft Minute for the SEEAWP meeting 7th December 2023

3	<p>Draft Local Aggregate Assessments</p> <p>The Secretary explained that under the new SEEAWP procedure for LAAs, critical metrics were made available earlier than usual, although the Secretariat was only aware of few conversations between mineral planning authorities (MPAs) and the industry.</p> <p>The Secretary invited any MPAs who had made changes to the submitted draft LAAs to explain these.</p> <p>SC explained that an alteration to the Joint Central & Eastern Berkshire (JCEB) LAA has been made to remove some data which turned out to be in Buckinghamshire. The Secretary asked if the changes would affect the current draft AR and confirmed these were correct.</p> <p>PR explained that contact was made by industry on the initial figures, although this was found to be an operator error, so no changes were made.</p> <p>BG explained that the total sand and gravel (S&G) reserves have been updated slightly and the recently circulated dashboard is slightly different to the initial dashboard.</p> <p>IB explained that the recycled aggregate figure has been updated based on the Waste Data Interrogator (WDI) for 2022.</p> <p>RS confirmed that some comments had been received and addressed. Secondary/Recycled Aggregate (S/RA) figures were not included as the return rate was not good. Like Medway, new figures are being calculated from the Environment Agency's WDI 2022. RS raised an issue about soft sand in hot rolled asphalt.</p> <p>The Secretary added that from his research only a small amount of sand is used for asphalt although much more is used in concrete²⁸.</p> <p>The Secretary invited members to raise any specific concerns or issues with LAAs, but there were no comments.</p> <p>The Chair invited David Payne to provide some general comments.</p> <p>DP raised a question on Aggregate Provision Rates (APRs). East Sussex have modified their Plan and includes a definition of demand, the PPG uses 10-year average. Although, looking at sales does not fully equate to demand. Reviewing all the LAAs there is a mixture of approaches to demand. DP thinks that meeting demand should be highlighted in each LAA.</p> <p>DP highlighted that some APRs have declined because of sales. However, if sales are dropping, other data may not have changed and so an explanation of the rationale would be appreciated. An example of Central & Eastern Berkshire was provided.</p> <p>DP added that some LAAs say there is no evidence to change the APR.</p> <p>DP thinks the graphs in the Oxfordshire LAA are helpful.</p> <p>DP explained that assumptions made in the West Sussex LAA provide a range of scenarios, which was helpful. However, looking at the Mineral Factsheet, DP could not</p>
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figure how the scenarios have been worked out. It was noted that this also applied to Surrey who had applied the same approach.

RS replied that he would contact DP to explain the West Sussex approach on completion of the LAA.

The Chair highlighted that demand is a forward looking metric and the consumption and sales data are backward looking. Thoughts on demand should be articulated.

BB has struggled to work out how the consumption figures have been calculated and feels more comfortable using other sources of data.

The Secretary explained that sales and consumption figures in AM 2019 are presented by 'sub-region' - although the British Geological Survey's (BGS) definition is not helpful. Moreover, the data arises from a matrix that BGS create and make available to MPAs but the data is not very reliable. Moreover, consumption might not equal demand, for example in Leicestershire, crushed rock demand would be the sales figure rather than consumption.

PA outlined that the 4 yearly survey considers both imports and exports into a sub region and PA challenged members to provide a better calculation method. PA also thought that Aggregate Monitoring (AM) 2019 had a response rate in the 90% which is high. The Aggregate Monitoring Survey (AMS) is included in the PPG for LAAs to consider. PA does not agree with LAAs ignoring the AMS data.

The Secretary qualified the point of data reliability. The response rate reported in AM2019 is a general one and sales data response relating to destinations was evidently lower. Some tables clearly show some sales as not allocated a destination. Nevertheless, MPAs should consider this information when preparing LAAs and though not wholly reliable, he agreed with PA that it's the only information of this type available.

BB asked if large amounts of imports are being taken from other areas should MPAs be considering these when estimating APRs when they have already been considered in the exporting MPA's APR (i.e. double counting)?

PA considered this a very good point and it relates to Statements of Common Ground. The draft AR refers to some MPAs needing to plan for neighbouring MPA's requirements. Where MPAs are supporting others with aggregate this needs to be built into their APRs.

IB believes the Medway crushed rock consumption figures originating from Kent do not seem to match up with other evidence. IB feels these figures are more reflective of sales.

SM suggested that mineral plans need to build in some flexibility in supply.

The Secretary agreed to write to each MPA to advise them of SEEAWP's comments on the LAAs. (Action 2)