

From: [Stuart Jeffery](#)
To: [MWLP - GT](#)
Subject: Submission to R19 consultation
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Dear KCC,

Below is Maidstone Green Party's submission to your Minerals and Waste Local Plan R19 consultation.

Stuart

Cllr Stuart Jeffery (Green Party - Bridge Ward)
Green Independent Alliance
Maidstone Borough Council

Key points:

- <!--[if !supportLists]-->1. <!--[endif]-->Hard rock availability is not an absolute requirement of the plan, Essex doesn't have any and therefore no sites are in their plan.
- <!--[if !supportLists]-->2. <!--[endif]-->The term ragstone should not be used in place of 'hard rock' as it suggests that no other hard rock is available when the document is clear that other rock types are available.
- <!--[if !supportLists]-->3. <!--[endif]-->Ragstone is a finite and precious resource used for heritage restoration. It should not be used for crushed aggregate.
- <!--[if !supportLists]-->4. <!--[endif]-->No ancient woodland should be put at risk for quarrying, ancient woodland is irreplaceable and must not be destroyed.

Detailed points:

The document refers to ragstone as the only form of crushed aggregate that can be used for crushed aggregate. While it may be the only form available in Kent, other forms of aggregate from outside of Kent are available. The document should just refer to crushed rock rather than ragstone, particularly as 5.11 acknowledges the potential for other forms of hard stone.

1.3.18 states 'Principles of Clean Growth (growing our economy whilst reducing greenhouse gas emissions), must be factored into all planning and development policies and decisions, whilst not becoming a barrier to new development.' We object to this statement. It down plays the catastrophic emergency that is unfolding with the climate and further damage to the climate should be a barrier to new development.

1.3.19 KCC have so far failed to provide any form of integrated transport and currently refuse to liaise with Maidstone Borough Council through the Joint Transportation Board.

2.2.5 “The BOAs [Biodiversity Opportunity Areas] are not constraints to development. They are areas where minerals and waste sites will best be able to support the strategic aims for biodiversity conservation in Kent.”

This is quite wrong. Mineral extraction and waste sites negatively impact on biodiversity and should be constraints for development.

3.0.4 “Deliver sustainable solutions to the minerals and waste needs of Kent” and “deliver a sustainable, steady and adequate supply of land- won minerals including aggregates” – using non-renewable sources cannot be considered sustainable as they are, by definition, finite.

“Safeguard economic mineral resources for future generations” – the only way to safeguard mineral resources is not to use them. This statement is clearly contradictory.

There needs to be a full “circular economy” with no landfill or incineration.

5.0.1 “[minerals] are a finite natural resource, and can only be worked where they are found, it is important to make the best use of them to secure their long-term conservation” – There is a clear lack of understanding here, as they are finite they cannot be conserved if they are being extracted.

“sustainable economic growth” is impossible. You can’t have ever ending economic growth on a finite planet. The strategy should recognise this and focus on sustainability only.

5.2.9 There are significant concerns about the environmental effects of marine dredged aggregates which should be properly understood before this source of mineral is allowed to continue to be used.

5.2.27 The need for crushed aggregate should not be simply defined by the volume that a private company has managed to sell, it should be defined by need.

5.9.2 Highlights the importance of Ragstone for heritage restoration. Currently just 1% of the ragstone is used for this with 98% being crushed for aggregate. Given the importance of the heritage need it seems madness to crush almost all the ragstone rather than preserving the supply for heritage use. With just a 10 year supply horizon defined in the document, it is clear that buildings such as the Tower of London, will not have a supply of stone for restoration for the future.

This need demonstrated the utter madness of continuing to extract this vital and limited stone for use as crushed aggregate.

5.10 There should be no new licences for extraction of fossil fuels, i.e. no exploration either. Unconventional hydrocarbon extraction is particularly damaging and must not be

allowed. The climate is collapsing, we have to stop making it worse.

Policy DM2 suggests that mineral sites will not be agreed on “ancient woodland and ancient or veteran trees will not be granted planning permission or identified in updates to the Minerals Sites Plan and any Waste Sites Plan unless the need for, and the benefits of the development in that location clearly outweigh any loss, justified by wholly exceptional reasons, and a suitable compensation strategy is in place.”

Given that ancient woodland takes 400 years to achieve, i.e. it is irreplaceable (as stated by the NPPF) it is difficult to understand why KCC think there is a potential for a “suitable compensation strategy”. In particular soil relocation has been shown to be pointless and ineffective.

6.6 Identifies the need for HWRCs yet it fails to mention how these will be accessed or what an appropriate level of provision is. There needs to be consideration for households without access to a car.

7.1 Sustainable design policies should: Not just minimise greenhouse gases but should be carbon neutral; they should be considered within the overall carbon budget as defined by the Tyndall Research Centre; and they should demonstrate 20% BNG.