



**Statement of Common Ground Between Medway Council
and Kent County Council Concerning Strategic Waste
Management and Minerals Supply Matters**

October 2020 Version reviewed and updated in April 2024

Signed July 2024

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1.0 Introduction and parties involved

1.1 National policy¹ states that: *“Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.”* And *“Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans.”*

1.2 National policy² expects that Local Plans will include ‘non-strategic’ and ‘strategic’ policies, and explains that strategic policies should *“.....set out an overall strategy for the pattern, scale and design quality of places (to ensure outcomes support beauty and placemaking), and make sufficient provision for:.....infrastructure”* including *“...waste management...”* and *“...the provision of minerals...”*.

1.3 National Policy states: *“In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these.”*³

1.4 This document represents a **Statement of Common Ground between Medway Council (MC) and Kent County Council (KCC)** and concerns the strategic matters of waste management and minerals (specifically aggregates) supply to seek to ensure that sufficient waste management and aggregate supply capacity is planned for in each area.

1.5 MC and KCC are neighbouring minerals and waste planning authorities (See Figure 1). Each has responsibility for planning for the future management of waste and supply of minerals in their areas by including relevant strategic policies in their relevant Local Plans.

1.6 KCC completed an Early Partial Review of its Kent Minerals and Waste Local Plan (KMWLP) (plan period to 2030) to amend policies relating to waste management capacity provision and minerals safeguarding. KCC also prepared a Mineral Sites Plan that includes allocations for a soft sand quarry and two sharp sand and gravel quarries. The modifications to the KMWLP and the Kent Mineral Sites Plan were adopted by KCC in September 2020. In light of a statutory five-year review, KCC is preparing and updated Kent Minerals and Waste Local Plan with a plan period of 2024 to 2039. It is anticipated that this Plan will be submitted for independent examination in May 2024. KCC is also seeking to address a predicted shortfall in hard rock provision, this may be addressed through an update to the adopted Mineral Sites Plan, if not the alternative is for greater importation via the County’s wharves and rail depots with the status of being safeguarded mineral importation, handling and transportation infrastructure.

¹ Paragraph 24 and 25 of the National Planning Policy Framework December 2023.

² Paragraph 20 of the National Planning Policy Framework December 2023.

³ Paragraph 27 of the revised National Planning Policy Framework December 2023.

1.7 Medway Council has provided responses to all consultation stages on the Kent Minerals and Waste Local Plan 2024-39. These responses can be found as appendices as follows:

- Appendix 1 – Medway Council Response to Regulation 18 consultation on updated Kent Minerals and Waste Local Plan, January 2022
- Appendix 2 – Medway Council Response to Regulation 18 consultation on 'Further Proposed Changes' to the Kent Minerals and Waste Local Plan, July 2023
- Appendix 3 – Medway Council Representation in response to publication of Regulation 19 'Pre-Submission' updated Kent Minerals and Waste Local Plan 2024-2039, February 2023

In its representation on the Regulation 19 'Pre-Submission' Kent Minerals and Waste Local Plan 2024-2039 MC did not raise any concerns in terms of the soundness of the Plan or its legality.

1.8 MC is preparing planning policies on waste management and minerals supply to be included in the new Medway Local Plan. Consultation on a further 'Regulation 18' Medway Local Plan is timetabled for June 2024. Planning policy for waste management and minerals supply in Medway is currently set out in saved policies prepared by Kent County Council in the 1990's and includes the:

- Kent Waste Local Plan (1998); and
- Kent Minerals planning policies concerning:
 - Construction Aggregates (1993);
 - Brickearth (1986);
 - Chalk and Clay (1997); and,
 - Oil and Gas (1997).⁴

1.9 KCC and MC are both members of the South East England Aggregates Working Party (SEEAWP). SEEAWP is a technical advisory group of mineral planning authorities and other relevant organisations covering the South East and is responsible for producing comprehensive data on aggregate demand and supply in the south east. In line with national Planning Practice Guidance, SEEAWP was an additional signatory to the original version of this Statement of Common Ground (SCG) in 2020. No comments were made by SEEAWP when considering the original version of this SCG and this update does not involve any material changes to the sections concerning planning for aggregates. The 2024 SCG was reported to SEEAWP at its meeting on the 7th May 2024 for its consideration.

⁴ Available at <https://www.medway.gov.uk/downloads/download/31/developmen>.

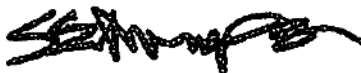
2.0 Agreement between the parties

2.1 This statement is agreed by MC's Chief Planning Officer and KCC's Head of Planning Applications.



16 July 2024

Dave Harris, Chief Planning Officer, Medway Council



19 July 2024

Sharon Thompson, Head of Planning Applications, Kent County Council

Insofar as this SCG relates to matters on aggregates, the South East England Aggregates Working Party is an additional signatory to the original version (2020) of this Statement of Common Ground:



9 July 2024

Tony Cook, [Chair], South East England Aggregates Working Party

3.0 Strategic Geography

3.1 Medway and Kent are neighbouring counties in the south east of England (see Figure 1). Medway formed part of the county of Kent until 1998 when it became a unitary authority. There are good road connections between the two areas, in particular the M2.

Waste management

3.2 Waste management data shows that an amount of waste produced in Medway is managed in Kent and an amount of waste produced in Kent is managed in Medway. Table 1 below shows the amounts of waste that travelled between the Plan areas in 2018, 2019, 2020, 2021 and 2022.

Table 1: Movements of Inert and Non-Hazardous Waste between Kent and Medway 2018 to 2022 (tonnes)

	Inert					Non- Hazardous				
	2018	2019	2020	2021	2022	2018	2019	2020	2021	2022
From Medway to Kent	47,902	111,542	31,070	50,216	16,452	29,794	31,487	69,134	68,032	73,351
From Kent to Medway	<80,704	<241,880	<199,262 ⁵	193,077	216,016	94,686	70,572	62,487	73,253	72,024

Table 2: Hazardous Waste Movements between Kent and Medway 2018 to 2022 (tonnes)

	2018	2019	2020	2021	2022
From Medway to Kent	2,667	2,260	1,741	2,365	2,469
From Kent to Medway	4,452	5,269	4,645	4,464	5,719

3.3 The South East Waste Planning Advisory Group (SEWPAG) Statement of Common Ground (March 2020) includes guidelines which indicate when movements of waste become 'strategic', that is when one authority is significantly reliant on another authority for the management of waste arising in its area. These guidelines are used to highlight when express agreement between member waste planning authorities on the continued movement of waste between them may be sought. These guidelines are as follows:

- Inert waste: 10,000 tonnes

⁵ Less than symbol '<' used because a tonnage of inert waste attributed to Kent reported as going to Commissioners Road Recovery to Land facility was reattributed to Medway in the C,D &E waste stream specific report of the Medway Waste Needs Assessment 2024.

- Non hazardous: waste: 5,000 tonnes
- Hazardous waste: 100 tonnes

3.4 Movements between the signatory authority areas for 2018, 2019, 2020, 2021 and 2022 that exceed these guidelines are set out in Appendix 1 on a site by site basis.

3.5 This Statement of Common Ground confirms that, subject to the comments in paragraph 3.6 and 3.7, both authorities are content for such movements to continue in future as there are no known planning reasons (in terms of planning policy and site specific conditions on planning permissions) why they may not continue.

Table 3 sets out the quantity of non hazardous waste identified as coming from Kent managed at facilities in Medway that may be subject to redevelopment should Chatham Docks be allocated in the forthcoming Medway Local Plan⁶. Therefore, these movements may not continue beyond the redevelopment of the Docks, should they be allocated.

Table 3: Management of Waste Arising in Kent at Facilities in Chatham Docks (tonnes)

	2018	2019	2020	2021	2022
From Kent to Chatham Dock sites	18,227	11,588	15,638	17,587	25,753

3.6 In the event that the existing waste facilities at Chatham Docks are lost, it should be noted that:

- Policy in the emerging Medway Local Plan will expect equivalent compensatory capacity to be identified elsewhere; and,
- there is equivalent⁷ surplus capacity in Kent capable of managing any 'diverted' waste; and,
- there is outline permission for equivalent 'other recovery' capacity in Medway that may also be developed to manage any diverted waste.

Sites with a finite lifespan

3.7 In addition to the above, the tonnages of waste shown in Table 4 below went to sites with a particular finite lifespan (deposit to land) that means the availability of their capacity may not necessarily be relied upon for a Plan period of 15 years. However, the annual tonnages deposited to land are relatively low and, particularly in the case of non-inert waste can be expected to decline significantly meaning that the lifespan of related site will extend and there will be opportunities beyond Medway and Kent (which are currently utilised) for the management of this waste.

⁶ Note that there is also an issue of expiry of leases in 2025.

⁷ In terms of the waste hierarchy.

Opportunities for the permanent deposit of inert waste are widespread including for use in engineering operations and restoration of mineral workings.

Table 4: Management of Waste at Facilities with Finite Lifespan (tonnes)

Note: Amber entries exceed strategic significance screening guidelines

		2018		2019		2020		2021		2022	
		From Kent to Medway	From Medway to Kent	From Kent to Medway	From Medway to Kent	From Kent to Medway	From Medway to Kent	From Kent to Medway	From Medway to Kent	From Kent to Medway	From Medway to Kent
Non Hazardous	Non Hazardous Landfill	0	5,198	0	3,881	0	773	0	0	0	0
Inert/C+D	Deposit to land for Recovery	14,700	10,474	<153,560	67,975	<87,320	19,778	104,720	2,429	175,440	640
	Inert Landfill	20,479	27,002	72,073	26,940	42,125	9,987	79,430	41,014	14,344	4,266
	Lagoon	0	0	0	0	58,530	0	0	0	0	0
	Non Hazardous Landfill	0	1,068	0	0	0	0	0	501	0	0

Minerals Supply⁸

3.7 The key economic minerals found within Kent are:

- Aggregate minerals:
 - Sharp sand and gravel
 - Soft sand
 - Crushed Rock
- Silica sand
- Chalk
- Brickearth
- Oil and gas

3.8 The supply of large quantities of marine dredged aggregate via wharves in Medway and Kent is of strategic importance. In Kent marine dredged aggregate is supplied into wharves in Ramsgate and north Kent ports. Medway's five wharves are also of regional importance, reporting 1.893Mt of marine-won sand and gravel sales in 2022. Crushed rock is also imported to the wharves in both Kent and Medway. The wharves in Kent and Medway have a combined capacity of around 10.6⁹Mtpa and are currently operating with approximately 4.5Mtpa of spare capacity offering significant ability to increase production in response to market demand. However, it should be noted that Kent's wharf distribution serves many different market areas than Medway's which serve, primarily, a north Kent market area and wider into

⁸ Information regarding aggregate in Kent and Medway is taken from the authorities' Local Aggregate Assessments which utilise data up to and including that from 2022

⁹ Medway wharf capacity = 4.3 Mtpa; Kent wharf capacity = 6.3Mtpa

London and beyond. Therefore, the available apparently unused maximum capacity in Kent and Medway should be seen as not necessarily being widely distributed and matched to market demands in the north Kent area.

3.9 Land-won mineral resources in Kent are important for the supply of soft sand and hard rock (though imports of hard rock appear to be increasing) but the available sharp sand and gravel resource is depleting and is significantly reducing in overall supply importance.

3.10 Current reserves of soft sand (5.5Mt) in Kent give a simple landbank of 9.6 years based on 2022 sales of 0.574Mt. Based on the 'LAA Rate' of 0.475Mt (the 10-year sales average), the maintained 7-year 'NPPF' landbank is 10.45Mt. The Kent Mineral Sites Plan allocates a soft sand quarry (Chapel Farm, Lenham) with a reserve of 3.2Mt which, when taken with existing reserves allows for a 7 year landbank to be maintained until 2036.

3.11 Within Medway the key economic minerals are:

- Sharp sand and gravel
- Chalk
- Brickearth

3.12 Currently, sand and gravel is the only land-won aggregate actively being extracted in Medway.

3.13 There are two permitted sand and gravel quarries in Medway:

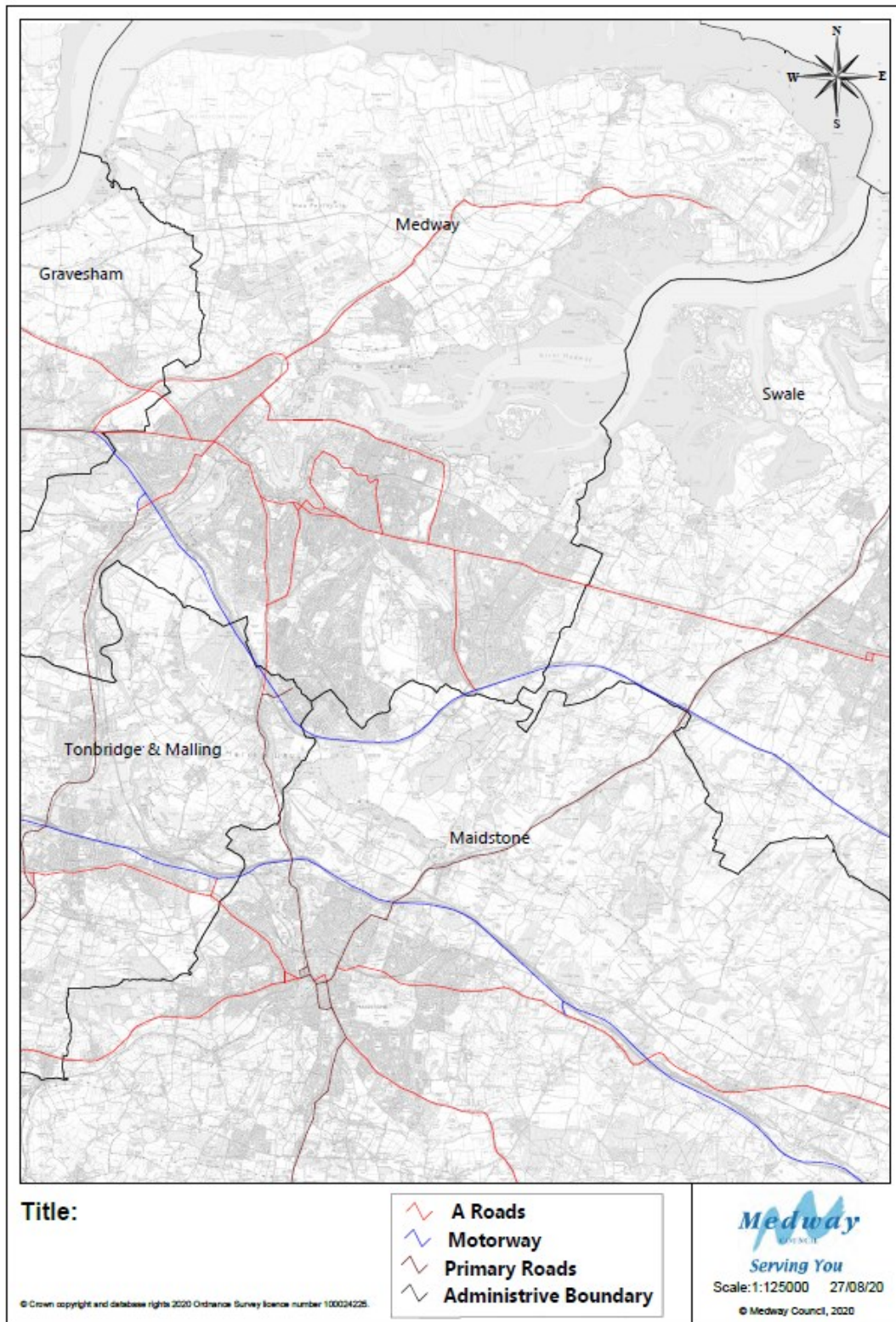
- Kingsnorth Quarry, near Hoo and
- Perry's Farm, Isle of Grain (currently inactive), .

Locations

3.14 The permitted reserve of sand and gravel in Medway was 0.372 Mt and the landbank, calculated using the 3- year average sales, was 5.2 years at the end of 2022. Due to production at the Kingsnorth Quarry site only commencing in 2017 the 10-year average sales is equivalent to the 3 year average sales.

3.15 The demand for aggregate in Medway is anticipated to increase and this will most likely be met by increased sales of marine dredged aggregate.

Figure 1: Location of Medway and Kent



4.0 Strategic Matters and Areas of Agreement - Waste

Net self-sufficiency

4.1 When applied to waste planning, net self-sufficiency is a principle that means an authority plans to provide waste management facilities with sufficient capacity to manage an amount of waste equivalent to that which is predicted to arise within its area over its Plan period. The use of the term 'net' means that it is irrespective of imports and exports. This approach is intended to ensure that sufficient waste management capacity is provided across a collective area (aka region) consistent with National Planning Policy for Waste¹⁰.

4.2 The approach of net self-sufficiency in the south east was originally set out in the now revoked South East Plan and is now enshrined in the SEWPAG Statement of Common Ground¹¹ to which MC and KCC are signatories. Importantly the SCG allows for individual authorities to deviate from adhering to the net self-sufficiency principle if certain conditions prevail, providing agreement is reached with affected authorities on a one-to-one basis. An extract from the SCG concerning net self-sufficiency is set out in Appendix 2 and the key section regarding deviation from adherence to it, is reproduced below:

*" **The Parties agree that provision for unmet requirements from other authority areas may be included in a waste local plan but any provision for facilities to accommodate waste from other authorities that cannot or do not intend to achieve net self-sufficiency will be a matter for discussion and agreement between authorities and is outside the terms of this SCG.**"*

4.3 Currently a capacity gap exists in Medway for the management of non-hazardous residual waste by landfill. Given the limitations concerning current and future availability of non-hazardous waste landfill capacity in Medway, MC intends to depart from adhering to the principle of net self-sufficiency in the preparation of its waste planning policies but only insofar as the planning for future non-hazardous landfill is concerned. This is on the understanding that such an arrangement will still see Medway waste move up the waste hierarchy.

Waste movements

4.4 Section 3.0 (and Appendix 1) shows that waste is transported between Medway and Kent. Both authorities recognise that cross-boundary movement is typical of the way in which waste is managed, as it is subject to market forces, generally having little regard to administrative boundaries. This is recognised in National Planning Policy for Waste that expects waste planning authorities to: *"plan for the disposal of waste and the recovery of mixed municipal waste in line with the proximity principle, recognising that new facilities will need to serve catchment areas large enough to secure the economic viability of the plant;"*.

¹⁰ NPPW states: "Waste planning authorities should prepare Local Plans which identify sufficient opportunities to meet **the identified needs of their area** for the management of waste streams." (para 3)

¹¹ Statement of Common Ground between the Waste Planning Authorities of South East of England, SEWPAG March 2020

4.5 Both authorities confirm that there are no planning reasons why the quantum of movements, as set out in Section 3.0, cannot continue into the future. In the event that capacity is lost at Chatham Docks and existing deposit to land capacity is depleted, both authorities can confirm that any compensatory capacity, that is utilised in Medway or Kent, will not be subject to controls on sources of waste and so cross boundary movements will not be hindered.

Waste Recovery Capacity

4.6 The Kent Waste and Minerals Local Plan aims to safeguard existing capacity so that Kent remains net self-sufficient while providing for a reducing amount of waste coming from London through the Plan period. It also seeks to encourage the development of additional capacity that will move waste up the hierarchy.

4.7 Waste facilities at Chatham Docks in Medway currently provide significant 'other recovery' capacity, however if the facilities were to be redeveloped this is unlikely to mean Medway is no longer net self-sufficient in other recovery capacity for non-hazardous waste for the following reasons:

- i. Any redevelopment may not actually occur during the plan period;
- ii. planning permission would only be granted if it could be demonstrated that either compensatory capacity is to be provided elsewhere, or that the capacity is no longer needed due to capacity requirements being met elsewhere;
- iii. the quantity of waste arising requiring 'other recovery' in Medway is significantly less than that provided by facilities at Chatham Docks; and,
- iv. outline planning permission¹² has been granted for an energy recovery facility in Medway (Medway One) with capacity that would compensate for the loss of capacity at Chatham Docks.

4.8 Furthermore, MC is committed to planning positively for the development of waste management capacity that supports the movement of Medway waste up the waste hierarchy through its emerging Local Plan and intends to take a similar approach to safeguarding existing capacity and the encouragement of capacity that moves waste up the hierarchy. However, it also recognises that given current arrangements, the development of recovery capacity within Medway dedicated to serve the needs of Medway alone may not prove to be viable. In the event that other recovery capacity is not developed within Medway, which is equivalent to waste arising in Medway requiring recovery, MC therefore expects surplus recovery capacity in Kent and elsewhere to meet Medway's needs and this is accepted by KCC. Both MC and KCC will continue to monitor the situation via the production of their respective annual Authority Monitoring Report.

¹² Planning application - MC/21/0979 Kingsnorth Power Station, Power Station Access Road, Hoo St Werburgh, Rochester

Waste Recycling Capacity

4.9 While there is no apparent shortfall in recycling capacity in Kent, there may be an emerging need for specialist Materials Recovery Facility (MRF) capacity to meet future national policy requirements for increased recycling of Local Authority Collected Waste (LACW). In this context it is noted that Medway Council has granted planning permission for the development of a MRF with 100,000 tpa of capacity that would offer ample capacity to meet Kent's LACW recycle separation needs as well as that of Medway's.

5.0 Strategic Matters and Areas of Agreement – Aggregates

5.1 The most recent assessment of Kent's need to supply soft sand and sharp sand and gravel is set out in the Regulation 19 Pre-Submission Draft of the KMWLP 2024-39 and is based solely on the average of the previous 10-year sales of the aggregate minerals from sites in Kent.

Soft Sand

5.2 Kent has historically supplied soft sand to Medway and so it is considered that Medway's unmet requirements for soft sand are captured within Kent's 10 year average sales value for soft sand. Medway's demand for soft sand has therefore been taken account of by KCC in the adopted KMWLP 2013-30 and Kent Mineral Sites Plan and the emerging KMWLP 2024-39.

Sharp Sand and Gravel

5.3 The adopted KMWLP 2013-30 and Kent Mineral Sites Plan ensure ongoing supplies of land-won sharp sand and gravel but only for as long as resources allow, which reflects the fact that land won supplies in Kent are severely limited and opportunities for additional supplies are heavily constrained. In light of this, and due to the proximity of the Kingsnorth quarry in Medway to Kent, it is likely that sales from this site have contributed and will continue to contribute to meeting demand in Kent and so offset requirements from sites in Kent. In any event, it is noted that KCC has not relied on Kingsnorth when planning to meet its needs. MC is committed to plan positively for the steady and adequate supply of aggregate through its emerging Local Plan so that the needs of local and regional markets are met. MC proposes to identify areas of search for sharp sand and gravel supply in its Local Plan.

5.4 Both MC and KCC will continue to monitor the situation via the production of their respective annual Local Aggregates Assessments. Data for 2022, published in the most recent Local Aggregates Assessments, notes that reserves at quarries in Kent and Medway have continued to decline while sales of marine sand and gravel from wharves have increased.

6.0 Additional Strategic Matters

Safeguarding

6.1 Each authority will seek to safeguard waste management and minerals supply capacity in its own area through robust planning policies. The KMWLP 2013-30 and Pre-Submission KMWLP 2024-39 include a presumption against granting permission for other forms of development which could result in reductions in physical or operational waste and minerals capacity (either by reductions in numbers and size of sites or by reduction in site throughput or restrictions on operation). MC intend to adopt a similar approach. Where development is proposed that might result in a reduction in capacity, the contribution the affected capacity makes to meeting the needs of other areas will also be taken into account.

6.2 Marine won aggregate is landed at wharves in both Medway and Kent and this material is used interchangeably to meet the needs of Medway and Kent. Both authorities recognise that as landwon sources of sand and gravel have been depleted there is greater reliance on marine won aggregate and this reliance will increase. In addition, wharves in Kent and Medway are used to import crushed rock to supply local and wider regional needs. In light of their importance, KCC and MC will safeguard mineral wharves in their areas to ensure the import of marine won aggregate and crushed rock can continue. Any wharves engaged in waste material importation, that can have a bearing on the supply of recycled and secondary aggregate supply, would also be safeguarded as waste management capacity infrastructure.

6.3 Railheads are also used to supply mineral into Kent and, historically, into Medway. These railheads make an important contribution to ensuring a steady and adequate supply, mainly of aggregate. Both authorities will safeguard railheads to ensure that the import of mineral by rail into the area can continue. All rail depots engaged in waste material importation, that can have a bearing on the supply of recycled and secondary aggregate supply, are also safeguarded as waste management capacity infrastructure.

6.4 Common ground on other matters between MC and KCC relating to waste management is set out in the Statement of Common Ground between the Waste Planning Authorities of the South East of England, March 2020. This includes the following:

- Principle of planning for some inert excavation waste from London;
- implementation of the waste hierarchy;
- provision of capacity within waste local plans; and,
- recognition of waste industry influence on delivery of actual capacity.

6.5 MC and KCC are also party to the following Joint Position Statements:

- Non-hazardous landfill in the South East of England, SEWPAG, March 2019
- Permanent Deposit of Inert Waste to Land in the South East of England, SEWPAG, November 2019
- South East Mineral Planning Authorities' Soft Sand Position Statement, 2023

7.0 Cooperation Activities

7.1 Activities undertaken when in the process of addressing the strategic cross-boundary matter of waste management and minerals supply, whilst cooperating, are summarised as follows:

- Input to draft proposals for planning policy concerning waste management and minerals supply in each other's area;
- input into the preparation of each authorities' annual Local Aggregates Assessments
- membership of the South East Waste Planning Advisory Group and signatories to related joint SCG and joint position statements;
- membership of the South East England Aggregates Working Party; and,
- ad-hoc exchange of information (via correspondence and meetings) related to the monitoring of waste movements and management capacity.

8.0 Governance and Future Arrangements

8.1 The parties to this Statement have worked together in an ongoing and constructive manner. MC and KCC will continue to cooperate and work together in a meaningful way and on an ongoing basis to ensure the effective strategic planning for waste management and minerals supply within their areas. Officers of each party to this Statement will continue to liaise through correspondence and meetings as and when required (including via meetings of SEWPAG and SEEAWP).

8.2 The parties will review this SCG at least every 12 months and establish whether it requires updating. Specific matters likely to prompt updates of this SCG include the following:

- Main modifications to the submitted updated KMWLP (2024-2039) resulting from its independent examination (anticipated in late 2024)
- Regulation 19 Publication of the draft new Medway Local Plan in 2025.
- Main modifications to the submitted new Medway Local Plan resulting from its independent examination (anticipated in 2025)
- Any evidence indicating significant changes in the management requirements of waste produced within their respective areas and minerals movements between the two authority areas.

Appendix 1 - Reported movements of waste between Medway and Kent in 2018-2023 in excess of SEWPAG guidelines on strategic movements

N.B. Italicised values less than guidelines, but included for completeness

Table A1 Non Hazardous Waste >c5,000t (Source: Environment Agency Waste Data Interrogator)

Facility WPA	Facility Name	Operator	Exports from Medway to Kent					Exports from Kent to Medway				
			2018	2019	2020	2021	2022	2018	2019	2020	2021	2022
Kent	Kemsley Generating Station	Enfinium K3 CHP Operations Ltd	0	0	51,273	48,989	50,056	N/A	N/A	N/A	N/A	N/A
	East Kent RDF Facility	Veolia Environmental Services (UK) Plc	8,932	10,823	0	4,627 ¹³	4,726	N/A	N/A	N/A	N/A	N/A
	Greatness Quarry Landfill	Enovert South Ltd	5,198	0	0	0	0	N/A	N/A	N/A	N/A	N/A
	Ridham Composting	Countrystyle Recycling Ltd	4,673	0	0	0	0	N/A	N/A	N/A	N/A	N/A
Medway	Berth 6, Chatham Dockyard	Street Fuel Ltd	N/A	N/A	N/A	N/A	N/A	16,867	10,615	13,007	14,808	18,586
	Capstone HWRC	Medway Norse Ltd	N/A	N/A	N/A	N/A	N/A	6,699	6,311	4,211	4,344	3,743
	Kingsnorth Industrial Estate	Composting Facility Services	N/A	N/A	N/A	N/A	N/A	0	5,533	9,730	6,280	4,799
	Cuxton HWRC	Medway Norse Ltd	N/A	N/A	N/A	N/A	N/A	8,745	7,509	2,455	985	0
	Hoath Way HWRC	Medway Norse Ltd	N/A	N/A	N/A	N/A	N/A	5,836	5,542	4,010	714	0
	Pelican Reach (Plot L)	Viridor Waste Kent Ltd	N/A	N/A	N/A	N/A	N/A	22,869	28,376	20,735	33,232	28,483
	Building 63, Chatham Docks	Chatham Freight Station Ltd	N/A	N/A	N/A	N/A	N/A	1,359	973	2,631	2,585	5,835
	Unit 7, Templemarsh Estate	Countrystyle Recycling Ltd	N/A	N/A	N/A	N/A	N/A	23,728	3,827	0 ¹⁴	-	-
Whitewall Road	European Metal Recycling Ltd	N/A	N/A	N/A	N/A	N/A	0	0	5,033	8,964	7,788	

¹³ Site converted from East Kent RDF Facility to East Kent Waste Transfer Station in 2021.

¹⁴ Site closed in 2020

Table A2 Inert Waste > c10,000 t (Source: Environment Agency Waste Data Interrogator)*N.B. Italicised values less than guidelines, but included for completeness*

Facility WPA	Facility Name	Operator	Exports from Medway to Kent					Exports from Kent to Medway				
			2018	2019	2020	2021	2022	2018	2019	2020	2021	2022
Kent	Borough Green Landfill ¹⁵	Robert Body Haulage Ltd	27,002	26,940	9,987	41,014	4,266	N/A	N/A	N/A	N/A	N/A
	Allington Depot	Hanson Quarry Products	0	13,826	0	-	-	N/A	N/A	N/A	N/A	N/A
	Twyford & Klondyke	S Walsh & Sons Ltd	0	67,007	19,625	2,405	-	N/A	N/A	N/A	N/A	N/A
Medway	Commissioners Road Recovery Operation	Medway Preservation & Development Ltd	N/A	N/A	N/A	N/A	N/A	14,700	<153,560 ₁₆	<87,320	<104,720	<175,440
	Manor Farm Barn Landfill ¹⁷ & Recovery Operation	Downland Trading (Kent) Ltd	N/A	N/A	N/A	N/A	N/A	20,479	72,073	42,125	79,430	14,344
	Redham Meade	Boskalis Westminster Ltd	N/A	N/A	N/A	N/A	N/A	0	0	58,530	-	-
	Unit 7, Templemarsh Estate	Countrystyle Recycling Ltd	N/A	N/A	N/A	N/A	N/A	8,245	0 ¹⁸	-	-	-
	Unit 1, Templemarsh Estate	Kent Soils And Composts Ltd	N/A	N/A	N/A	N/A	N/A	24,269	0 ¹⁹	-	-	-
	Unit 5t5 Temple Boat Yard	Saward Tipping Services Ltd	N/A	N/A	N/A	N/A	N/A	-	4,512	7,376	6,800	12,532

¹⁵ 2019 EA data suggests 830k tonnes void capacity remaining

¹⁶ Less than symbol '<' used as a tonnage of inert waste attributed to Kent reported as going to Commissioners Road Recovery to Landfill facility was reattributed to Medway in the C,D &E waste stream specific report.

¹⁷ 2019 EA data suggests 682k tonnes void capacity remaining

¹⁸ Site closed in 2020

¹⁹ Site closed and relocated operation to Kent

Table A3 Hazardous Waste >100t (Source: Environment Agency Waste Data Interrogator)*N.B. Italicised values less than guidelines, but included for completeness*

Facility WPA	Facility Name	Operator	Exports from Medway to Kent					Exports from Kent to Medway				
			2018	2019	2020	2021	2022	2018	2019	2020	2021	2022
Kent	Manor Way Business Park	Ace Car Breakers	1,537	1,210	976	1,329	1,604	N/A	N/A	N/A	N/A	N/A
	Sittingbourne WEEE Recycling Facility	Sweep Kuusakoski Ltd	1,023	938	663	791	707	N/A	N/A	N/A	N/A	N/A
	Aylesford Metals Recycling Facility	London Mining Associates Ltd	-	4	2	102	8	N/A	N/A	N/A	N/A	N/A
Medway	Capstone HWRC	Medway Norse Ltd	N/A	N/A	N/A	N/A	N/A	195	181	152	126	117
	Cuxton HWRC	Medway Norse Ltd	N/A	N/A	N/A	N/A	N/A	245	212	82	37	-
	Hoath Way HWRC	Medway Norse Ltd	N/A	N/A	N/A	N/A	N/A	161	166	130	33	-
	Kingsnorth Oil Treatment Plant	Slicker Recycling Ltd	N/A	N/A	N/A	N/A	N/A	2,596	3,793	3,099	338	4,058
	Rochester Clinical Waste Treatment Facility	Tradebe Healthcare National Ltd	N/A	N/A	N/A	N/A	N/A	1,186	619	1,094	383	674
	Whitewall Road	European Metal Recycling Ltd	N/A	N/A	N/A	N/A	N/A	-	61	17	120	187

Appendix 2 – Extract from the SEWPAG Statement of Common Ground concerning net self sufficiency

2.1 **The Parties agree** that they will plan for net self-sufficiency which assumes that within each waste local plan area the planning authority or authorities will plan for the management of an amount of waste which is equivalent to the amount arising in that plan area. For the avoidance of doubt, **the Parties agree** that they will plan on the basis that no provision has to be made in their waste local plans to meet the needs of any other waste local plan area which are basing their waste policies on achieving the principle of net self-sufficiency.

2.2 **The Parties accept** that when using this principle to test policy, it may not be possible to meet this requirement for all waste streams, particularly where a specialist facility is required to manage specialist waste streams such as hazardous waste.

2.3 **The Parties agree** that they will therefore prepare plans which provide for the development of facilities that will manage waste produced within, and beyond, their areas based on net self-sufficiency and in accordance with the waste hierarchy.

2.4 **The Parties recognise that** there may be cases where, despite assessing reasonable options, some waste will not be planned to be managed within a waste plan area because of difficulty in delivering sufficient recovery⁵ or disposal capacity (E.g. Due to certain designations e.g. Green Belt, AoNB, National Park (see sections below)). **The Parties agree** that provision for unmet requirements from other authority areas may be included in a waste local plan but any provision for facilities to accommodate waste from other authorities that cannot or do not intend to achieve net self-sufficiency will be a matter for discussion and agreement between authorities and is outside the terms of this SCG.

2.5 **The Parties note** that, despite assessing reasonable options, there may be some kinds of waste requiring specialist treatment that cannot be managed within their own plan area, either in the short term or within the relevant plan period. These may include hazardous wastes and radioactive wastes. Where provision for the management of these wastes will be planned for in a different waste planning authority area, this will need to be considered between the relevant authorities. **The Parties agree** that provision for some kinds of wastes, including hazardous and radioactive waste, from other authority areas may be included in a waste local plan but that any provision for facilities to accommodate this waste from other authorities that cannot or do not intend to achieve net self-sufficiency will be a matter for discussion and agreement between authorities and is outside the terms of this SCG.

Appendix 1 – Medway Council Response to Regulation 18 consultation on updated Kent Minerals and Waste Local Plan, January 2022

Chloe Palmer - GT GC

From: bull, andrew <andrew.bull@medway.gov.uk>
Sent: 08 February 2022 18:40
To: MWLP - GT
Cc: smith, catherine
Subject: RE: Kent Minerals and Waste Local Plan 2013-30 Full Review 2021

Hi Alice

Kent Minerals and Waste Local Plan 2013-30 Full Review, Regulation 18 Public Consultation

Thank you consulting Medway Council on an update to the Kent Minerals and Waste Local Plan 2013-30. This response has been made on behalf of Medway Council's Planning Service.

It is understood that the proposed revisions will not change Kent's waste management and minerals supply in future. The proposed revisions respond to government legislation and policy since the plan was adopted in 2016.

A Statement of Common Ground (SoCG) between Medway Council and Kent County Council concerning strategic waste management and minerals supply was agreed in October 2020. Medway Council is preparing planning policies on waste management and minerals supply to be included in the new Local Plan. The SoCG will need to be updated as part of our ongoing engagement through the Duty to Cooperate.

Regards
Andrew

Andrew Bull MRTPI | Strategic Infrastructure Planner | Planning Service | Medway Council | **01634 331417** | Gun Wharf, Dock Road, Chatham, ME4 4TR



Appendix 2 – Medway Council Response to Regulation 18 consultation on ‘Further Proposed Changes’ to the Kent Minerals and Waste Local Plan, July 2023

Version 1

Date: 10 August 2023



Minerals and Waste Planning Policy
Team
Kent County Council

Planning Service
Culture and Community
Regeneration, Culture and Environment
Medway Council
Gun Wharf
Dock Road
Chatham
Kent
ME4 4TR
Telephone: 01634 306000

By email only

Dear Sir / Madam

Consultation draft of the revised Kent Minerals & Waste Local Plan

Thank you for the opportunity to comment on the consultation draft of the revised Kent Minerals & Waste Local Plan (KMWLP) and the nominated extension to Hermitage Quarry for potential inclusion in the Kent Mineral Sites Plan.

Further Proposed Changes to the KMWLP

As an immediate neighbouring authority, Medway Council has a close interest in the evolution of Kent's mineral and waste planning policy. As a former part of the administrative county of Kent, Medway Council is still applying many of the policies contained in plans previously adopted by Kent County Council relating to the management of waste and supply of minerals, including the Kent Waste Local Plan 1998, these having been saved by the Secretary of State at the Medway Council's request.

It is noted that the principal areas addressed by the KMWLP consultation document are as follows:

1. Changes to Policy CSM 2, and associated supporting text, relating to the quantity of aggregate mineral to be planned for.
2. Deletion of Policy CSW 5 that allocates land for an extension to Norwood Quarry, Isle of Sheppey for subsequent filling with hazardous flue ash.
3. 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.

It is also noted that you have received specialist support from BPP Consulting, whose services Medway Council is also using in supporting the development of minerals and waste planning policies to be included in its Local Plan.

Proposed change to Policy CSM 2

Medway Council notes that these changes have been made in light of more recent aggregate sales and supply data and the intention to change the plan period. This approach seems sensible and Medway Council has no further comment to make on this matter.

Version 1

Proposed change to Policy CSW 6

Medway Council notes that the proposed change has been made in light of more current information around the need for additional capacity to manage hazardous flue ash, and that information contained in the updated report on Hazardous Waste Management Requirements, found that this type of waste, previously managed through landfill at the Norwood Quarry site, is now largely being managed through means other than landfill. Medway Council also notes that removal of the policy does not necessarily prevent the development of additional landfill capacity should it be needed, but merely removes the presumption towards its provision. Medway Council also notes that provision for hazardous waste, such as APCr is a matter not limited by Plan area net self sufficiency objectives, and therefore provision may be planned for in a manner that takes account of regional, or even national, provision. In that context, the most recent assessment of hazardous waste management requirements in Medway produced for Medway Council by BPP Consulting, indicates Medway is a net importer of hazardous waste and is thus making provision for 'larger than local' needs in that respect.

Medway Council has a particular interest in the planning of provision of capacity for the management of air pollution control residues in that it has recently granted outline planning consent for a potential Energy from Waste plant at the Medway One development in Kingsnorth, which does not as yet have an identified outlet for its APCr should it be developed. However, the Medway Council is committed to supporting the waste hierarchy and therefore would expect any prospective operator to manage residues in accordance with the hierarchy with disposal to landfill being the least preferred option, even if such capacity is relatively local. Medway Council intends to include a policy reflecting this position in its revised Local Plan, which in turn would be reflected in any assessment of proposals for the management of APCr associated with the Medway One development.

Proposed 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

Medway Council understands and supports the intention of these changes, which is to ensure the KMWLP aligns with the London Plan aspiration and the SEWPAG Statement of Common Ground (SCG) to which it is a signatory. However, Medway Council notes that it is may not be able to adhere to the SCG's aspiration of all WPAs achieving net self sufficiency, and would therefore wish to be assured that the change proposed by Kent County Council, does not signal an intention to move away from the provision of capacity which would meet other WPA areas' (in particular those within the South East such as Medway) needs, where this is justified as being an appropriate solution.

Kent Mineral Sites Plan

I also confirm Medway Council has no specific comments on the current consultation relating to the Kent Mineral Sites Plan.

Yours faithfully

Andrew Bull

Andrew Bull MRTPI
Principal Planner (Spatial Data & Infrastructure)

Page 2 of 2

Appendix 3 – Medway Council Representation in response to publication of Regulation 19 ‘Pre-Submission’ updated Kent Minerals and Waste Local Plan 2024-2039, February 2023



Planning Service

Medway Council
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ME4 4TR

Our Ref:
Your Ref:
Tel:
E-mail: andrew.bull@medway.gov.uk

28 February 2024

Minerals and Waste Planning Policy Team
Kent County Council

By email: MWLP@kent.gov.uk

Dear Sir/Madam

Kent Minerals & Waste Local Plan 2024-2039 - Proposed Submission Draft

Thank you for the opportunity to comment on the Proposed Submission Draft revised Kent Minerals & Waste Local Plan (KMWLP).

As a neighbouring authority, Medway Council has a close interest in Kent's mineral and waste planning policy. As a former part of the administrative county of Kent, Medway Council is still applying many of the policies contained in plans previously adopted by Kent County Council relating to the management of waste and supply of minerals, including the Kent Waste Local Plan 1998, these having been saved by the Secretary of State at the Medway Council's request.

Following comments made on earlier drafts of the updates to the KMWLP, I am pleased to confirm that Medway does not wish to make any comments on the soundness or legality of the Proposed Submission Draft version of the Plan.

As noted in Appendix 7 of the Duty to Cooperate report, a Statement of Common Ground (SCG) exists between Medway Council and Kent County Council on waste and minerals planning matters and this to be updated. Medway Council is currently updating its waste needs assessment and will be in a position to update the SCG as soon as this has been completed.

I can also confirm that Medway Council will be consulting on a revised Draft Medway Local Plan later this year and Kent County Council will be notified in due course.

Yours faithfully,

ACBull

Andrew Bull MRTPI
Principal Planner (Spatial Data & Infrastructure)

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