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HEARING STATEMENT MATTER 2 KENT MINERALS AND WASTE LOCAL PLAN EIP

On Behalf of
Borough Green Sand Pits Ltd

August 2024

1.0 This Hearing Statement should be read in companion to the extensive Representations made to the Kent Minerals and Waste Local Plan as through it has progressed through its various stages.

2.0 Question 20- Does the Spatial Vision adequately address biodiversity and climate change impacts?

2.1 The current Kent Minerals and Waste Local Plan was adopted in 2020; however, its Examination took place in Autumn 2019.

2.2 On 23 May 2019 Kent County Council officially recognised the UK Climate Emergency and stated:

Through the framework of the Energy and Low Emissions Strategy, we will facilitate the setting and agreement of a target of net zero emissions by 2050 for Kent and Medway.

2.3 Whilst the climate change emergency was recognised prior to the current Local Plan being Examined or adopted the Local Plan was at an advanced stage and modifications to the Plan to recognise the emerging position were not undertaken.

2.4 Consequently, since the adoption of the Plan in 2020 there have been significant developments at a County level in relation to tackling climate change.

2.5 In 2020 Kent County Council published the Kent and Medway Energy and Low Emissions Strategy alongside Medway and the 12 District and Borough Councils. The Low Emissions Strategy sets out how the Authorities will respond to the UK climate emergency, reduce fuel poverty and eliminate poor air quality whilst supporting clean, sustainable economic recovery across the county.

2.6 There are 10no. 'Priorities' included in the Strategy, of particular note is Priority 6 which relates to 'Transport, Travel and Digital Connectivity' and sets out the matters of tackling poor air quality and achieving a safe and effective transport network as being a key challenge for Kent and Medway.

2.7 In the commentary around Priority 6, the Strategy states that congestion continues to be a problem with average journey times on A-roads up by 6% since 2015. A short term high level activity included in the strategy is the need to develop and expand sustainable travel policies that can reduce car use and business miles.

2.8 In spite of the above, the Spatial Vision included in the Kent Minerals and Waste Local Plan has not substantively changed from that within the adopted Local Plan. The Spatial Vision includes 12no. objectives, of which 4no. are general objectives, 4no. are specific to minerals development and 4no. specific to waste development. Reference to the Low Emissions Strategy is included within the introductory section of the Kent Minerals and Waste Local Plan; however, is not referenced further within the Spatial Vision.

2.9 The Spatial Vision does reference climate change within both the general objectives and those specific to minerals and waste development. However, it does not incorporate the need to incorporate climate change principles into the overall spatial strategy. For example, mineral site allocations made no consideration of the impact of spatial

distribution upon climate change. Allocating sites which are more distant from the markets they serve increases road mileage, congestion on local roads, and results in detriment to air quality.

- 2.10 Considering the impact of minerals and waste development on climate change should be a fundamental element of the Spatial Vision and underly not only specific development proposals but also the principles of how sites are allocated.

3.0 Question 22- How would the Plan's Policies be effective in meeting Objective 1 in terms of progressing to a low carbon economy?

- 3.1 Objective 1 states the Plan will encourage the use of sustainable, low carbon modes of transport for moving minerals and waste long distances and minimise road miles.
- 3.2 As above, in order to reduce road miles it is important to consider the overall spatial distribution of minerals sites. Our Representations are specifically focused upon the supply of soft sand. Soft Sand in Kent supplies a wide market across the south east and it is acknowledged that supply from Kent also serves East Sussex, West Sussex and Essex. The spatial distribution of minerals sites is therefore important in minimising and reducing road miles travelled.
- 3.3 The Kent Minerals and Waste Local Plan Review does not consider the impact of allocating only 1no. new site in Lenham for soft sand in respect of the increased road miles to transport the mineral to the wider market. Further, the mineral would need to be transported over 10km on the A20 before reaching the motorway. The A20 already suffers congestion which is exacerbated when Operation Brock is implemented. This would detrimentally impact upon congestion and local air quality.
- 3.4 Existing quarries in West Kent which are closer to the motorway network, and to the markets in North and West Kent, East and West Sussex and Essex are soon to be exhausted. Consequently there will be an increased reliance on the minerals being transported from the only new allocated site at Lenham.
- 3.5 Reducing road miles travelled by minerals is the quickest, easiest and most effective way of reducing carbon emissions and moving towards a low carbon economy in the immediate term.

