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20 February 2024

Minerals and Waste Planning Policy  
1<sup>st</sup> Floor, Invicta House  
Maidstone  
Kent  
M14 1XX

**By email only: [mwlp@kent.gov.uk](mailto:mwlp@kent.gov.uk)**

Dear Sir/Madam,

## **PRE-SUBMISSION DRAFT KENT MINERALS AND WASTE PLAN 2024-2039 – REGULATION 19 CONSULTATION RESPONSE ON BEHALF OF AGGREGATE INDUSTRIES AND BRETT AGGREGATES**

### **1. Introduction and Background Information**

Firstplan is instructed by Aggregate Industries UK Ltd ('AI') and Brett Aggregates Ltd ('Brett') to provide the following response to the Kent Minerals and Waste Local Plan 2024-39 – Pre-Submission Draft ('Pre-Submission Draft MWLP') Regulation 19 consultation, which commenced on 17 January 2024. This response relates to AI and Brett's interest in the safeguarded Robins Wharf, Northfleet.

Firstplan on behalf of AI and Brett previously made representations to the Kent Minerals and Waste Local Plan 2023-38 – Draft Plan (October 2022) via letter dated 2 December 2022. As detailed then, AI and Brett were supportive of the draft Plan in the context of those parts/policies relevant to the Robins Wharf site and operations. The changes proposed by the Pre-Submission Draft make some welcome additional wording changes to Policies previously commented on. For ease of reference, the comments previously provided in December 2022 have been included and updated as relevant to provide the full response on behalf of AI and Brett.

The AI and Brett operations were set out and detailed in the 2 December 2022 letter however for ease this is re-provided below.

AI together with Eurovia own and operate a joint venture known as North Kent Roadstone Limited ('NKR') at Robins Wharf. Eurovia are a specialist highway services contractor. AI/NKR operate a river-fed asphalt plant 'Northfleet Asphalt Plant' which is supplied its material by jetty located to the north-east. The jetty is used together with the neighbouring occupier Brett as an aggregates unloading facility for both crushed rock aggregates and marine sand and gravel. Importation of material by river is permitted on a 24 hr / 7 day a week basis; and production of asphalt and exportation by road is similarly undertaken on a 24 hr / 7 day a week basis.

On the north-western part of the Robins Wharf site, Brett operate as an aggregate processing facility and a ready mixed concrete batching plant. The aggregates processing facility and the ready mixed concrete batching plant operate on a 24 hr / 7 days a week basis. HGVs distributing ready mixed concrete may leave the site any time during these hours, whilst HGVs carrying aggregate from the site are limited to 0700 – 1800 Mondays to Fridays and 0700 – 1300 on Saturdays.

Plans detailing the operations at Robins Wharf are attached at **Appendix 1 (a)** Robins Wharf, Northfleet – AI/North Kent Roadstone Operations (Annotated Google Earth Map) and **Appendix 1 (b)** Robins Wharf, Northfleet – Brett Site Location Plan.

The ability to import significant amounts of crushed rock aggregate and marine sand and gravel via Robins Wharf, both to service the operator’s on-site plant/operations and to service the wider construction industry is key to the sustainable supply of construction materials to the area. The use of water to deliver materials reduces the need for long distance HGV movements and brings with it associated emissions savings and environmental benefits. The wharf and associated minerals infrastructure will be increasingly key in supporting the delivery of planned development in the surrounding area. The safeguarded wharf and associated plant are integral to the business interests of both AI/NKR and Brett and are strategically located both in terms of importation of material (linked to sources of supply) and in terms of exportation to serve the market area. The operators also benefit from security of long term tenure (freehold) of the wharf. It is considered that it would be extremely challenging to replicate the operations (importation of material and on-site plant) elsewhere. It is confirmed that both operators are committed to the on-going long-term operation of Robins Wharf for its safeguarded purpose.

AI/NKR and Brett’s principal concern in responding to the Regulation 19 consultation is in ensuring the continued protection and safeguarding of Robins Wharf for important minerals function.

## **2. Policy Context and Evidence Base**

The National Planning Policy Framework (‘NPPF’) 2023, in the context of ‘Facilitating the sustainable use of minerals’, is clear at Paragraph 216 (e) that planning policies should:

***“safeguard existing, planned and potential sites for: the bulk transport, handling and processing of minerals; the manufacture of concrete and concrete products; and the handling, processing and distribution of substitute, recycled and secondary aggregate material.”***

The Kent Minerals and Waste Local Plan 2013-30 was adopted by Kent County Council (‘KCC’) in July 2016 and partially updated in 2020. Robins Wharf is identified as a ‘Safeguarded Wharf’ on the Policies Map and as “Site G” at Appendix 2. The mapping provided for Site G identifies the split between the two areas operated by Aggregate Industries and Brett respectively.

In terms of evidence base documents, the most recent KCC Local Aggregates Assessment (‘LAA’) 2023 (December 2023) is clear in confirming at paragraph 7.29 that:

***“It is recognised that capacity information will become increasingly important in future years, particularly in relation to wharves and rail depots. The 2017 study by the Minerals Products Association into future aggregate requirements suggests that nationally there could be a decrease in the demand for landwon aggregates over time. However, as the landwon resource depletes (as is currently occurring for sharp sand and gravels within Kent) and is substituted significantly by marine-won aggregates or landwon materials from other locations, productive capacity of importation facilities, both individually and in total, will be increasingly important indicators of the resilience of supply, analogous to landbanks within the landwon sector. Kent still has significant unused capacity in its wharfage, as it appears to be operating at approximately 44% capacity at the end of 2022 (leaving 56% headroom). This is an increase over 2021, possibly due to improved facilities being in place. However, loss of any wharf site will be, largely irreplaceable and so others will need to increase their throughputs to compensate for lost capacity. Ignoring this issue as an unimportant matter neglects the consideration of the difficulties in operating facilities at a higher level of***

*throughputs in a consistent manner. Difficulties such as shipping availability, navigation maintenance, facility repair and renewal considerations all could combine to exert stress on a wharf importation system trying to operate at a higher rate. Safeguarding of the existing wharf infrastructure will therefore remain a central requirement to maintain supply as the landwon sand and gravel sector eventually becomes irrelevant.”*

To add to this, Al and Brett note that importance should also be had to geographical positioning and how the wharf and plant operate in terms of market area. These factors can place a strain on wharf infrastructure and therefore are critical considerations in ensuring these types of facilities remain safeguarded.

The LAA 2023 concludes at paragraph 8.2:

*“The landwon sharp sands and gravels continue to decline as a share of overall supply expressed as sales.*

The LAA at paragraph 8.6 goes on to underscore the point that:

*“The importance of safeguarding wharves (significantly for marine dredged sand and gravel supply that is supplanting landwon resources) and rail depots will remain paramount. All indications are that they will remain a growing important element in maintaining overall primary aggregate supply into the future. This is particularly the case with the landwon sharp sands and gravels that have now, to all intents and purposes, have become of minor importance in overall supply terms in Kent into the future. Marine dredged imports via Kent’s wharves are now of far greater importance for this aggregate type. It may also be the case if further allocations of landwon hard crushed are not secured, and supply has to rely upon imports. As a result, future security of supply of primary aggregate will increasingly be via imports, of which, wharfage remains the dominant importation mode.”*

### **3. Specific Response to the Pre-Submission Draft Kent Minerals and Waste Local Plan**

As detailed the key concern of the operators of the safeguarded Robins Wharf is to ensure the on-going safeguarding of the wharf and associated operations/plant in line with the currently adopted Minerals and Waste Plan and as required by the NPPF. The particular need for and importance of the on-going safeguarding of Robins Wharf specifically (together with on-going safeguarding of the other identified Wharves within the Minerals and Waste Plan area) is underpinned amongst other things by the latest LAA (2023) and the critical issue of ensuring the future security of supply.

Review of the changes proposed by the Pre-Submission Draft MWLP Regulation 19 Consultation Document has been undertaken in the context of the particular interest in Robins Wharf. In this context it is noted that there is no proposed change to the status of the Robins Wharf site from that in existing adopted MWLP. This approach is fully supported by the operators of the Wharf. As confirmed within the Firstplan letter dated 2 December 2022 and as updated following review of the Pre submission Draft MWP the following comments are made:

- **Paragraph 1.2.3** – Continued guidance in terms of the relevance of the Plan to the determination of non-minerals and waste applications and identification of the main policies that will be implemented is supported.
- **Figure 13: Minerals Key Diagram – Sustainable Mineral Supply** – is supported as it continues to identify the safeguarded wharves.
- **Figure 13A: Minerals Key Diagram Inset Map – Sustainable Mineral Supply** – is supported as it continues to identify Robins Wharf as a safeguarded wharf.

- **Spatial Vision for Minerals and Waste Kent** – the intent as detailed at part 7 that planning for minerals in Kent will, amongst other things, safeguard all existing, planned, and potential mineral transportation and processing infrastructure (including wharves and rail depots and production facilities) is supported.
- **Strategic Objectives for the Minerals and Waste Local Plan** – the confirmation at part 7 as a strategic objective in the context of ‘Minerals’ to: safeguard existing, planned and potential sites for mineral infrastructure including wharves and rail depots across Kent to enable the on-going transportation of marine dredged aggregates, crushed rock and other minerals as well as other production facilities is supported.
- **Policy CMS6 Safeguarded Wharves and Rail Depots and supporting text at paragraph 5.6** – fully supported, including continued identification of Robins Wharf, Northfleet (both operational sites) and requirements in respect of consultation on non-mineral development at or within 250 m of a safeguarded minerals transportation facility.
- **Policy CMS7 Safeguarding Other Mineral Plant Infrastructure and supporting text** – ongoing policy safeguarding of mineral plant infrastructure on a wharf for the life of the host site is fully supported.
- **Policy DM8 Safeguarding Minerals Management, Transportation, Production & Waste Management Facilities** – is fully supported in detailing the criteria against which planning applications for development that is incompatible with safeguarded facilities will be assessed. This is predicated on supporting text (para 7.6.1) that it is essential to the delivery of the Plan’s mineral and waste strategy that existing facilities used for management of minerals (including wharves and rail depots) are safeguarded for the future. In addition, the additional wording now proposed in the context of early engagement with the MPA at paragraph 7.6.6 is fully consistent with NPPF ‘agent of change’ principle and is a helpful addition to the Policy in championing for early engagement with incompatible development that may come forward in proximity to the safeguarded site.

In response to the Kent Minerals and Waste Local Plan 2023-38 – Draft Plan Regulation 18 consultation Firstplan suggested on behalf of AI and Brett that KCC could take the opportunity either as part of this review or as an update to the SPD to expressly require early (pre-application) engagement with the operator of the safeguarded facility.

It is noted that KCC have not taken this forward in the Pre-Submission Draft MWLP document. The KCC Proposed Submission Document: Consultation Statement January 2024 accompanying the Regulation 19 consultation provides KCC response on this matter; this explains that *“Early engagement in the planning application process is important. Though the process is a voluntary matter, and therefore should not be part of a plan policy. It is more suitably expressed in any review or replacement of the Supplementary Planning Document (SPD) on land-won minerals and minerals and waste management facility safeguarding. The policy’s supporting text can be amended to make this clear.”* Firstplan note the position set out by KCC in terms of this being a ‘voluntary matter’ and are keen to confirm that lack of reference to early engagement with the safeguarded site operator does not raise matters of ‘soundness.’ However, it is considered that there would be scope, and that it would be good planning practice, to recommend in the MWLP itself in supporting text that there should be early engagement in the planning application process with operators of safeguarded wharves or other mineral infrastructure – if it is considered that this cannot be set out in policy.

AI and Brett have various examples of safeguarded sites they operate from where applications for sensitive development have come forward within the vicinity where there has been no engagement at all with them as the operator at pre-application stage. Proposals have then been designed and assessed that do not fully or appropriately take account of the existing site operations (hours of operation, key noise generating activities, HGV movements etc...) or where baseline assessments have not been timed to capture key hours of operation so that the proposals do not then properly consider mitigation requirements.

In this context – whilst not raised as an objection, KCC are requested to consider again taking the opportunity as a matter of clarity and good planning practice, to recommend in supporting text in the MWP that early (pre-application) engagement with the operator of the safeguarded facility is progressed. Clear detailing of this requirement in the Plan itself is considered a key part of safeguarding objectives. The intent being to avoid applications being made which have not appropriately or robustly assessed the safeguarded facility and if required identify early any potential conflicts between the proposed development and the safeguarded uses under the ‘agent of change’ principle and resulting mitigation requirements. Once developments are well advanced and at post submission stage it can be very challenging to re-design leading either to delay for the applicant and/or need to withdraw or critically threatening the safeguarded site and operations it supports.

Notwithstanding the above, the commitment made by KCC that they propose to assess this as part of a review/replacement of the SPD is welcomed.

- **Chapter 9 – Adopted Policies Maps** – on-going identification of Robins Wharf as a safeguarded wharf and identified as ‘Site G’ is fully supported.

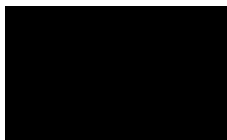
#### **4. Conclusions and Test of Soundness**

AI and Brett support the continued identification of their site as a Safeguarded Wharf on the Minerals Key Diagram and Policies Map. They also support the wording of the policies and objectives as referenced above. These are consistent with the policy approach found sound in respect of the currently adopted Minerals and Waste Plan and there has been no material change in the interim in terms of relevant NPPF requirements or other considerations which would support any different approach being taken in the Pre-Submission Draft MWLP.

AI and Brett on this basis confirm their support for the Pre-Submission Draft MWLP and consider it complies with the National Planning Policy Framework (NPPF) tests of soundness in terms of being ‘justified’, ‘effective’, ‘positively prepared’, and particularly with regard to the requirement to be ‘consistent with national policy’.

Should you require any further information or clarification of the response made please do not hesitate to get in contact. In addition, it is confirmed that if there are any changes to the above policies or the Local Plan Map proposed during the course of the Examination in Public relevant to the matters raised, then our clients wish to reserve the right to make further representations.

Yours faithfully,



VILNA WALSH  
Director

cc. Jo Baker - Aggregate Industries UK Ltd  
Richard Ford - Brett Aggregates

## Appendices 1(A) and 1(B)

Robins Wharf, Northfleet – Aggregate Industries/North Kent Roadstone Operations

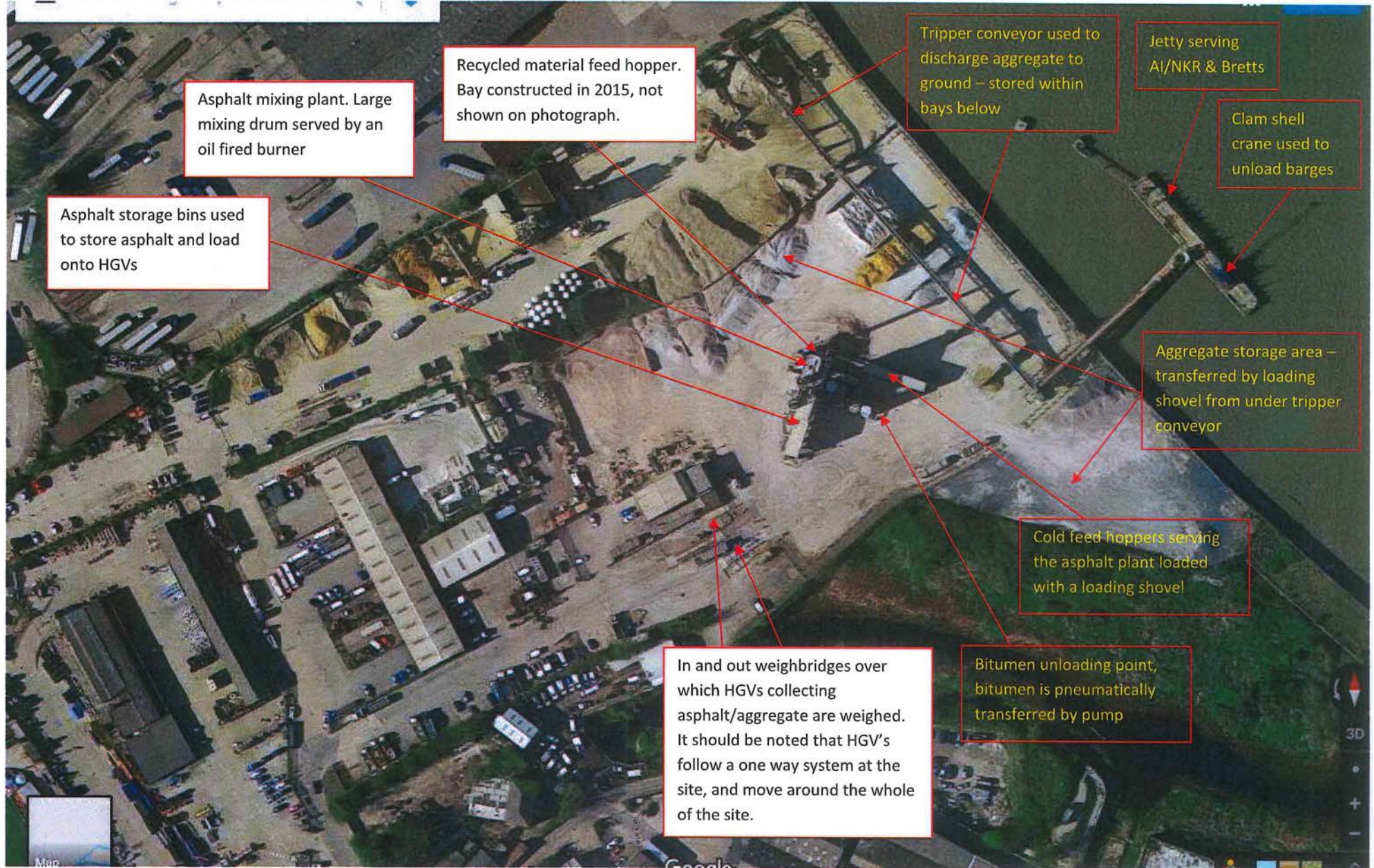


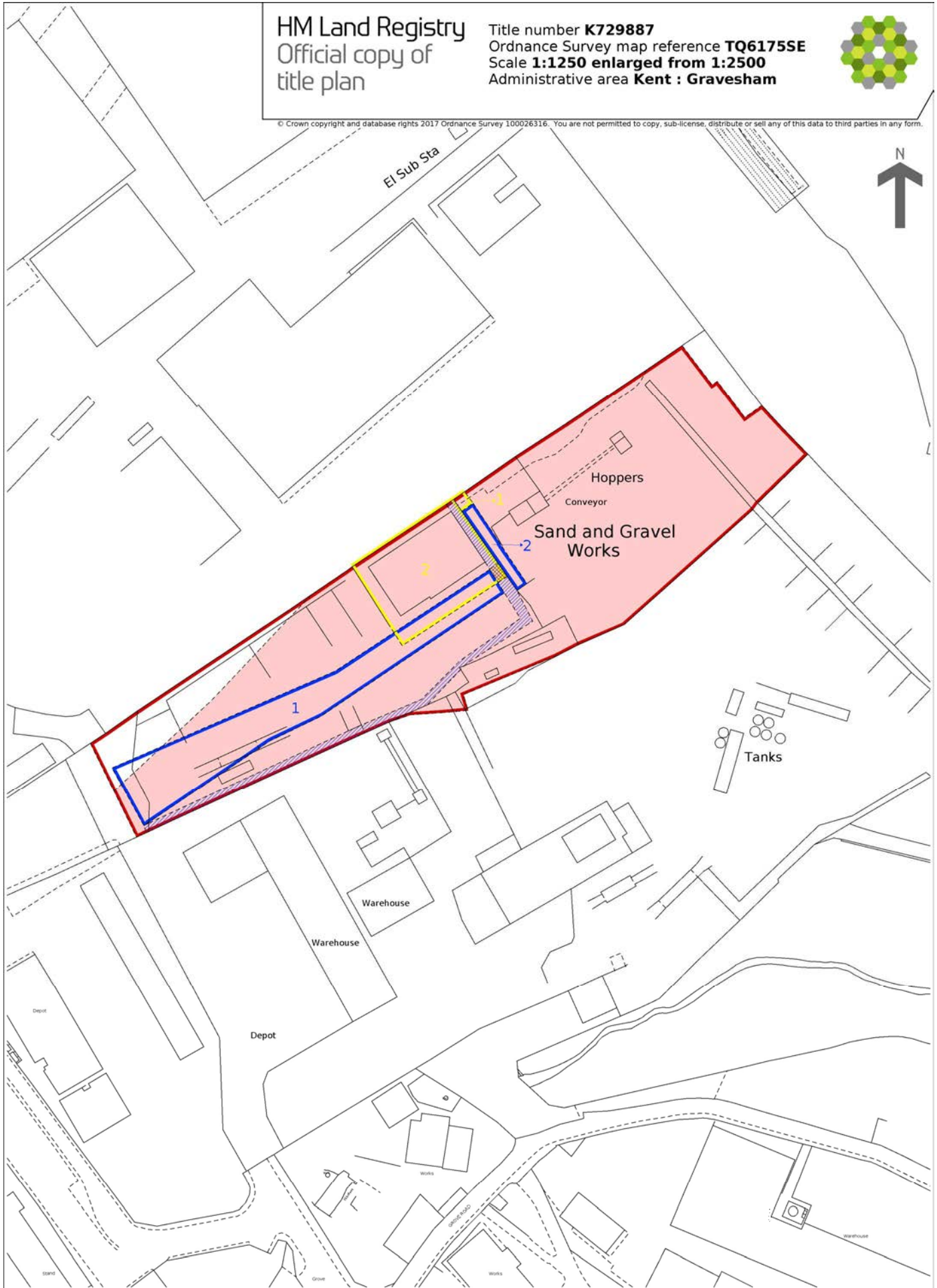
Image courtesy of Google

HM Land Registry  
Official copy of  
title plan

Title number **K729887**  
Ordnance Survey map reference **TQ6175SE**  
Scale **1:1250 enlarged from 1:2500**  
Administrative area **Kent : Gravesham**



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## Section A - Personal Information

**Q1. Please tell us in what capacity you are completing this form:**

Please select one option.

- |                                     |  |
|-------------------------------------|--|
| <input type="checkbox"/>            | As an individual                           |
| <input checked="" type="checkbox"/> | On behalf of someone else                  |
| <input type="checkbox"/>            | On behalf of an organisation / affiliation |

**Q1a. Please tell us your name or the person you are responding on behalf of:**

Please provide a first and last name. Please write in below.

Aggregate Industries UK Ltd and Brett Aggregates Ltd – c/o Firstplan Ltd

**Q1b. Please tell us the name of your organisation / affiliation (if relevant):**

Please write in below.

Ms Vilna Walsh – Firstplan Ltd

**Q1c. Please provide details of who should be contacted regarding this response:**

Please include an address, phone number and email address in the box below.

Firstplan Ltd

Broadwall House

21 Broadwall

London

SE1 9PL

[vwalsh@firstplan.co.uk](mailto:vwalsh@firstplan.co.uk)

02030967000

## Section B - Representation

You will need to complete questions 2 and 3 for each part of the plan that you wish to comment on. Please duplicate these questions as many times as required to cover each part of the plan you wish to comment on.

If you would rather not provide feedback on a specific part, please state 'no comment' and move on to the next question.

**Q2. Which part of the draft Kent Minerals and Waste Local Plan 2024-39 or element of its preparation does this representation relate to? Please be specific in terms of paragraph numbers and document title.** Please tell us in the box below.

Refer to attached document (Firstplan letter dated 20.02.2024 ref: 16365/VW/ta) for full representation:

- Paragraph 1.2.3

**Q2a. Do you consider this part of the draft Kent Minerals and Waste Local Plan 2024-39 or element of its preparation to be legally compliant? Select one option.**

X	Yes
	No
	Don't know

**Q2b. Do you consider this part of the draft Kent Minerals and Waste Local Plan 2024-39 or element of its preparation to be sound? Select one option.**

X	Yes
	No
	Don't know

The Inspector must be satisfied that the Local Plan meets four soundness requirements: is 'positively prepared', is 'justified', 'effective' and 'consistent with national policy'. In the [Guidance on making a Representation](#) document you will find explanations on each of these four requirements and how they need to be met.

**Q2c. If you consider the draft Kent Minerals and Waste Local Plan 2024-39 to be unsound, please select the reason for this:** Please select all that apply.

<input type="checkbox"/>	Positively prepared
<input type="checkbox"/>	Justified
<input type="checkbox"/>	Effective
<input type="checkbox"/>	Consistent with national policy

On the following pages, please explain why you think this part of the Plan is unsound or not legally compliant, and set out any changes you feel should be made to this part of the Plan to make the Plan sound and legally compliant.

**Q2d. If you consider the draft Kent Minerals and Waste Local Plan 2024-39 to be unsound and/or not legally compliant, please explain why in the box below.** Please be precise and give as much detail as possible.

n/a
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**Q3. Please explain in the box below what change(s) you consider necessary to make the draft Kent Minerals and Waste Local Plan 2024-39 legally compliant and/or sound.**

Please be precise as possible and explain why this change(s) would make the draft Local Plan legally compliant and sound. Please also include in your response any suggested revised wording you feel is necessary.

n/a
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Refer to attached document (Firstplan letter dated 20.02.2024 ref: 16365/VW/ta) for full representation:

- Figure 13: Minerals Key Diagram

**Q2a. Do you consider this part of the draft Kent Minerals and Waste Local Plan 2024-39 or element of its preparation to be legally compliant? Select one option.**

X	Yes
	No
	Don't know

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	Positively prepared
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<input type="checkbox"/>	Effective
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Refer to attached document (Firstplan letter dated 20.02.2024 ref: 16365/VW/ta) for full representation:

- Figure 13A: Minerals Key Diagram Inset Map – Sustainable Mineral Supply

**Q2a. Do you consider this part of the draft Kent Minerals and Waste Local Plan 2024-39 or element of its preparation to be legally compliant? Select one option.**

X	Yes
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	Don't know

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Refer to attached document (Firstplan letter dated 20.02.2024 ref: 16365/VW/ta) for full representation:

- Spatial Vision for Minerals and Waste Kent

**Q2a. Do you consider this part of the draft Kent Minerals and Waste Local Plan 2024-39 or element of its preparation to be legally compliant? Select one option.**

<input checked="" type="checkbox"/>	Yes
<input type="checkbox"/>	No
<input type="checkbox"/>	Don't know

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Refer to attached document (Firstplan letter dated 20.02.2024 ref: 16365/VW/ta) for full representation:

- Strategic Objectives for the Minerals and Waste Local Plan

**Q2a. Do you consider this part of the draft Kent Minerals and Waste Local Plan 2024-39 or element of its preparation to be legally compliant?** Select one option.

X	Yes
	No
	Don't know

**Q2b. Do you consider this part of the draft Kent Minerals and Waste Local Plan 2024-39 or element of its preparation to be sound?** Select one option.

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n/a

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Refer to attached document (Firstplan letter dated 20.02.2024 ref: 16365/VW/ta) for full representation:

- Policy CMS6 Safeguarded Wharves and Rail Depots and supporting text at paragraph 5.6

**Q2a. Do you consider this part of the draft Kent Minerals and Waste Local Plan 2024-39 or element of its preparation to be legally compliant? Select one option.**

X	Yes
	No
	Don't know

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Consistent with national policy

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Refer to attached document (Firstplan letter dated 20.02.2024 ref: 16365/VW/ta) for full representation:

- Policy CMS7 Safeguarding Other Mineral Plant Infrastructure and supporting text at paragraphs 5.7 (5.7.1 and 5.7.2)

**Q2a. Do you consider this part of the draft Kent Minerals and Waste Local Plan 2024-39 or element of its preparation to be legally compliant? Select one option.**

X	Yes
	No
	Don't know

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	No
	Don't know

The Inspector must be satisfied that the Local Plan meets four soundness requirements: is 'positively prepared', is 'justified', 'effective' and 'consistent with national policy'. In the [Guidance on making a Representation](#) document you will find explanations on each of these four requirements and how they need to be met.

**Q2c. If you consider the draft Kent Minerals and Waste Local Plan 2024-39 to be unsound, please select the reason for this: Please select all that apply.**

	Positively prepared
	Justified
	Effective
	Consistent with national policy

On the following pages, please explain why you think this part of the Plan is unsound or not legally compliant, and set out any changes you feel should be made to this part of the Plan to make the Plan sound and legally compliant.

**Q2d. If you consider the draft Kent Minerals and Waste Local Plan 2024-39 to be unsound and/or not legally compliant, please explain why in the box below. Please be precise and give as much detail as possible.**

n/a

**Q3. Please explain in the box below what change(s) you consider necessary to make the draft Kent Minerals and Waste Local Plan 2024-39 legally compliant and/or sound.**

Please be precise as possible and explain why this change(s) would make the draft Local Plan legally compliant and sound. Please also include in your response any suggested revised wording you feel is necessary.

n/a

**Q2. Which part of the draft Kent Minerals and Waste Local Plan 2024-39 or element of its preparation does this representation relate to? Please be specific in terms of paragraph numbers and document title.** Please tell us in the box below.

Refer to attached document (Firstplan letter dated 20.02.2024 ref: 16365/VW/ta) for full representation:

- Policy DM8 Safeguarding Minerals Management, Transportation, Production & Waste Management Facilities and supporting text at paragraphs 7.6 (7.6.1 -7.6.6)

**Q2a. Do you consider this part of the draft Kent Minerals and Waste Local Plan 2024-39 or element of its preparation to be legally compliant?** Select one option.

X	Yes
	No
	Don't know

**Q2b. Do you consider this part of the draft Kent Minerals and Waste Local Plan 2024-39 or element of its preparation to be sound?** Select one option.

X	Yes
	No

Don't know

The Inspector must be satisfied that the Local Plan meets four soundness requirements: is 'positively prepared', is 'justified', 'effective' and 'consistent with national policy'. In the [Guidance on making a Representation](#) document you will find explanations on each of these four requirements and how they need to be met.

**Q2c. If you consider the draft Kent Minerals and Waste Local Plan 2024-39 to be unsound, please select the reason for this:** Please select all that apply.

- Positively prepared
- Justified
- Effective
- Consistent with national policy

On the following pages, please explain why you think this part of the Plan is unsound or not legally compliant, and set out any changes you feel should be made to this part of the Plan to make the Plan sound and legally compliant.

**Q2d. If you consider the draft Kent Minerals and Waste Local Plan 2024-39 to be unsound and/or not legally compliant, please explain why in the box below.** Please be precise and give as much detail as possible.

n/a

**Q3. Please explain in the box below what change(s) you consider necessary to make the draft Kent Minerals and Waste Local Plan 2024-39 legally compliant and/or sound.**

Please be precise as possible and explain why this change(s) would make the draft Local Plan legally compliant and sound. Please also include in your response any suggested revised wording you feel is necessary.

n/a

**Q2. Which part of the draft Kent Minerals and Waste Local Plan 2024-39 or element of its preparation does this representation relate to? Please be**

**specific in terms of paragraph numbers and document title.** Please tell us in the box below.

Refer to attached document (Firstplan letter dated 20.02.2024 ref: 16365/VW/ta) for full representation:

- Chapter 9 – Adopted Policies Maps – Robins Wharf Site G

**Q2a. Do you consider this part of the draft Kent Minerals and Waste Local Plan 2024-39 or element of its preparation to be legally compliant? Select one option.**

X	Yes
	No
	Don't know

**Q2b. Do you consider this part of the draft Kent Minerals and Waste Local Plan 2024-39 or element of its preparation to be sound? Select one option.**

X	Yes
	No
	Don't know

The Inspector must be satisfied that the Local Plan meets four soundness requirements: is 'positively prepared', is 'justified', 'effective' and 'consistent with national policy'. In the [Guidance on making a Representation](#) document you will find explanations on each of these four requirements and how they need to be met.

**Q2c. If you consider the draft Kent Minerals and Waste Local Plan 2024-39 to be unsound, please select the reason for this: Please select all that apply.**

	Positively prepared
	Justified
	Effective



Consistent with national policy

On the following pages, please explain why you think this part of the Plan is unsound or not legally compliant, and set out any changes you feel should be made to this part of the Plan to make the Plan sound and legally compliant.

**Q2d. If you consider the draft Kent Minerals and Waste Local Plan 2024-39 to be unsound and/or not legally compliant, please explain why in the box below. Please be precise and give as much detail as possible.**

n/a

**Q3. Please explain in the box below what change(s) you consider necessary to make the draft Kent Minerals and Waste Local Plan 2024-39 legally compliant and/or sound.**

Please be precise as possible and explain why this change(s) would make the draft Local Plan legally compliant and sound. Please also include in your response any suggested revised wording you feel is necessary.

n/a

**Q4. If you support the draft Kent Minerals and Waste Local Plan 2024-39, and wish to make any comments to that affect, please use the box below.**

Refer to attached document (Firstplan letter dated 20.02.2024 ref: 16365/VW/ta) for full representation.

The Planning Inspector will determine whether hearing sessions are required. If they are, he/she will also decide the most appropriate procedure to hear from those who have indicated that they wish to participate at the hearing sessions during the examination.

**Q5. Do you consider it necessary to attend and give evidence at any hearing sessions during the examination? Select one option.**

- Yes, I wish to speak to the Inspector at any hearing sessions
- No, I wish to communicate through written representations

Don't know

**Q5a. If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary in the box below:**

n/a

Thank you for taking the time to complete this form.