

From: [Natalie Earl](#)
To: [MWLP - GT](#)
Subject: Pre-Submission Draft of the Kent Minerals and Waste Local Plan 2024-2039 - Regulation 19 Public Consultation January 2024
Date: 29 February 2024 15:04:24
Attachments: [image001.png](#)
[image002.png](#)

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To whom it may concern,

Thank you for the opportunity to comment on the Pre-Submission Draft of the Kent Minerals and Waste Local Plan 2024-2039. Swale Borough Council have the following comments:

1. We are supportive of Policy DM13, especially where it states that “minerals and waste development will be required to demonstrate that emissions associated with road transport movements are minimised as far as practicable and by preference being given to non-road modes of transport.”
2. We are also supportive of point 3 of Policy DM13 where it states that emission control and reduction measures, such as deployment of low emission vehicles and environmentally sustainable vehicle technologies, installation of electric vehicle charging points (where appropriate) and vehicle scheduling to avoid movements in peak hours should be used and that “particular emphasis will be given to such measures where development is proposed within an AQMA or in a location where impacts on an AQMA will result.” This is a particularly pertinent issue for Swale as there have historically been brickearth extraction sites in both Teynham and Newington and both of these settlements also have AQMAs and the HGVs would potentially have to travel through other AQMAs to reach the strategic road network.
3. Paragraph 2.4.5 – The document mentions the available infrastructure for Energy from Waste (EfW) (with such a plant located in Sittingbourne with increased capacity coming online). It also outlines objectives of minimising road miles (page 56 items 1 & 12). With Swale BC household waste being transported from Swale to Allington for recovery, does this practice reflect these objectives when alternative closer options may be available?
4. As the waste disposal authority, KCC have requested Swale BC to tip food and other waste streams at separate locations, despite them being collected on the same vehicle. This decision adds to daily mileage, carbon emissions, unnecessary traffic and costs. Improved infrastructure at the Sittingbourne Waste Transfer Station would allow all waste streams to be deposited at the one site (reflecting principles highlighted in this KCC document).
5. When considering infrastructure at the Church Marshes Waste Transfer Station in Sittingbourne consideration needs to be given to future proofing the site for the future population growth. Is it suitable for both HWRC and transfer station? We would welcome plans being brought forward around how the county council plan on resolving this concern (in good advanced time) as this will be able to inform future decisions that the Borough

council make around its waste collection services.

6. KCC have recently introduced additional control measures at the Church Marshes Waste Transfer Station (WTS) at Sittingbourne to identify contaminated recycling and prevent contamination reaching the material recycling facility. However, although this principle is supported by the waste collection authority, the extent of which this process has been applied seems to be preventing a significant amount of recycling from reaching the recycling facility (52 lorry loads of recycling were rejected at the WTS in January 2024). This consequently reduces recycling rates considerably. This contradicts the principles outlined in this document around implementing the waste hierarchy. The process does not seem to have achieved its objectives of reducing rejections at the MRF/ improving quality at the MRF. Rejection rates at the MRF (material Recycling facility) have not changed much from before the initiative was implemented and contamination rates are similar to pre initiative figures. A target of 55% recycling by 2025 has been set nationally, yet the revised KCC practices have moved us much further away from this target with a significant drop in 2023/24 data compared to 22/23 data. The waste collection authority is actively targeting contamination and a range of measures are in place.

If you would like to discuss any of these comments, please do not hesitate to contact us.

Please can you confirm receipt of this representation.

Kind Regards,

Natalie

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