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KeepKent.Green is encouraged and pleased to see that KCC Pre -Submission Draft of the Kent Minerals and Waste Local Plan 2024 -Regulation 19 has considered further polices from its previous plan. Particularly the addition to Policy DM2, Policy DM 3 seeks to protect Kent's important biodiversity assets. Recognising Biodiversity net gain is maximised, while a statutory target of at least 10% biodiversity net gain for all development has been introduced, it is encouraging to note that the planners ambitions are aligned with Kent Nature Partnership of at least 20% to be achieved.

Is maintaining Stonecastle Farm Quarry and Mote Farm sites within the Pre – Submission Draft Minerals and Waste Local Plan 2024-2039 Justified?

One reason why maintaining Stonecastle Farm Quarry and Mote Farm sites within the Pre-Submission Draft Minerals and Waste Local Plan may not be justified is the potential environmental impact. Quarries and sand extraction sites can have significant negative effects on the surrounding ecosystems. They can lead to habitat destruction, loss of biodiversity, and disruption of local water sources. Given the increasing focus on sustainability and environmental conservation, it may not be justified to allocate land for activities that have such detrimental consequences.

Additionally, there may be alternative sources of sharp sand available that could be accessed without damaging or disrupting the natural environment. It would be more justifiable to explore these alternatives and prioritise sustainable practices rather than continuing to allocate land for quarrying purposes.

Furthermore, the economic benefits of maintaining these sites may not outweigh the potential long-term costs. While quarrying and sand extraction can provide short-term employment opportunities and contribute to the local



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economy, they are finite resources. Once the sites are depleted, there may be limited long-term economic benefits, especially compared to the potential opportunities that could arise from investing in renewable energy or other sustainable industries.

Overall, the potential environmental damage, availability of alternative sources, and limited long-term economic benefits may make it difficult to justify maintaining Stonecastle Farm Quarry and Mote Farm sites within the Minerals and Waste Local Plan. It would be more appropriate to prioritise sustainable practices and consider alternative options that have less negative impacts on the environment and offer more long-term benefits.

1. The Stonecastle Farm Quarry has been inactive for over 15 years, which exceeds the 10-year threshold for inclusion in land bank calculations. Therefore, it should not be included in the calculations.
2. The existing Stonecastle Farm Quarry, along with the Stonecastle Farm extension and Mote Farm sites, have been safeguarded for mineral extraction for 60 years. This demonstrates a long-term commitment to utilising these sites for their intended purpose.
3. The mineral extraction lease between the Landowner and Operator is either due to expire or has already expired. This indicates that the current agreement for mineral extraction may no longer be valid or in effect.
4. The proposed site M:13 has a 24-year lease that commenced in 2002 and is set to expire in 2026. This lease will soon come to an end, raising questions about the future use of this site for mineral extraction.
5. The Stonecastle Farm Quarry has a history of extensive landfill and quarrying



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activities for over 35 years. However, these activities ceased in 2008 due to the low-grade and financially unviable quality of the mineral, Sharp Sand, and Gravel. This further supports the argument that the quarry should not be included in land bank calculations.

6. Operations briefly resumed in 2018, but only for clearing trees, hedges, and vegetation, as well as removing noncompliant machinery and processing plant machinery. No mineral extraction has occurred since 2007, indicating that the site is not actively being used for its intended purpose.

7. The Landfill sites associated with Stonecastle Farm Quarry have been found to be noncompliant by the Environment Agency. This includes excessive leachate levels and unventilated methane gas, which poses environmental concerns. Enforcement action has been implemented against the operator, further highlighting the unsuitability of including the quarry in land bank calculations .

Although Policy DM7 addresses Safeguarding Mineral Resources and discusses permissions for non mineral development an inclusion / provision to allow the safeguarded land to return to its original agricultural use (where applicable) should be considered along with further aftercare conditions. this is captured in Policy DM19 Does this allow operators to get around key landscape, biodiversity and aftercare responsibilities of which has happened at Stonecastle Farm Quarry previously.

Policy DM 10

Water Environment-

Deterioration of water quality River Medway and Ground Water Protection Zone The Aquifer and Springs at Hartlake



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There are several pieces of evidence that indicate pollution at Hartlake Aquifers. Some of the key evidence includes:

1. **Water quality testing:** Regular water quality testing conducted in the area has revealed the presence of various pollutants in Hartlake Aquifers. These tests measure parameters such as chemical concentrations, turbidity, pH levels, and the presence of heavy metals and contaminants. The results often show elevated levels of pollutants, indicating pollution in the aquifers.
2. **Contaminant sources:** There are known sources of pollution in the vicinity of Hartlake Aquifers. These sources include industrial facilities, agricultural activities, and urban areas with inadequate wastewater treatment systems. These activities contribute to the release of pollutants such as pesticides, herbicides, fertilizers, heavy metals, and industrial waste into the aquifers.
3. **Declining groundwater quality:** Over time, the quality of groundwater in Hartlake Aquifers has shown a decline. Studies have indicated an increase in the concentration of pollutants and a decrease in overall water quality. This decline is often attributed to pollution from various sources that have contaminated the aquifers.
4. **Health issues in nearby communities:** Communities living near Hartlake Aquifers have reported health issues that can be linked to polluted water sources. These health problems include gastrointestinal illnesses, skin conditions, and respiratory issues. Such health impacts provide evidence of pollution in the aquifers, as contaminated water can affect human health when consumed or used for daily activities.
5. **Impact on aquatic ecosystems:** Aquatic ecosystems in and around Hartlake



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Aquifers have shown signs of pollution impacts. Studies have highlighted a decrease in biodiversity, changes in species composition, and reduced overall health of aquatic organisms. These ecological changes are often indicators of pollution, as pollutants can directly harm aquatic life and disrupt the balance of ecosystems.

Overall, the combination of water quality testing, identification of contaminant sources, declining groundwater quality, health issues in nearby communities, and impacts on aquatic ecosystems provide substantial evidence of pollution in Hartlake Aquifers.

Medway Catchment Partnership (www.Medwaypartnership.irq.uk) Details Hammer Dyke which runs through and Stonecastle Farm Quarry highlights some issues including-

Flooding
Water Quality
Aquatic Ecology

2019 the Environment Agency discovered at Hammer Dyke high levels of Mercury and its compounds as well high levels of Polybrominated Diphenyl (PBDE) there is evidence linked with land disturbance as well as landfill sites.

2018/2019 the quarry operator moved substantial quantities of Soil, removed many mature trees, shrubs and hedgerows to widen and extend an existing haul road.



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In view of further evidence since the last KCC Waste and Minerals Review as well as additional Flood Risk Assessment's of the neighbouring areas from TMBC and TWBC and the expiration of KCC Flood Risk Management Strategy Report 2017-2023 we would hope to see some inclusion of a review of latest SFRA, Landfill, Restoration and Aftercare and Water Quality polices to provide necessary assurances that these issues are not overlooked at any planning application stage.