

Minerals and Waste Planning Policy Team,
1st Floor
Invicta House
Maidstone
Kent
ME14 1XX

BY EMAIL: mwlp@kent.gov.uk
Also uploaded via the KCC Consultation Portal

29TH February 2024

TAR002/AO

Dear Policy Team,

**RE: Pre-Submission Draft of the Kent Minerals and Waste
Local Plan 2024-39 – Regulation 19 Consultation.**

We write on behalf of Tarmac Cement and Lime Limited with specific regard to the permitted Medway Cement Works at Holborough.

The site of the Medway Cement Works, permitted under implemented planning permission TM/98/785, falls within the control of Tarmac Cement and Lime Limited ('Tarmac') and Lafarge UK Holdings Limited ('Lafarge'). Tarmac and Lafarge are continually reviewing their cement manufacturing capacity and will periodically consider whether alternative development prospects exist for permitted or operational sites. Whilst alternative uses are being considered, that should not be interpreted to preclude the construction of a new cement works at Holborough.

The Council struck out Policy CSM 3 (which safeguards the Medway Cement Works as a strategic site for minerals) as part of the Full Review of the adopted Kent Minerals Local Plan. We support the Council's approach and consider the principle to be sound.

We note the wording inserted at paragraph 5.2.37 provides context for the deletion of CSM 3 and sets out how any alternative proposal at the cement works site should be considered. Reference is made to Policies DM7 and DM8 which, respectively and in summary, relate to safeguarded minerals sites and to safeguarded minerals infrastructure.

Paragraph 5.2.37 also references Policy CSM 5 as relevant. Whilst Policy CSM 5 did previously reference the Medway Cement Works as a safeguarded asset, it no longer does so (amendments to that policy wording having also been affected through the previous KMWLP Full Review). We consider the continued cross-reference within paragraph 5.2.37 to Policy CSM 5 to be an erroneous reference which should be deleted. Whilst it is a matter of soundness (it is not justified to rely upon Policy CSM 5 when that is not relevant to the implementation of that paragraph and thus the provisions of paragraph 5.2.37 are not sound), it is capable of remedy through a minor text amendment. We do, however, **object** to paragraph 5.2.27 in the above context.

We trust that the above provides sufficient basis for amending paragraph 5.2.37. Whilst we anticipate that a minor editorial

DAVID LOCK ASSOCIATES LIMITED

50 North Thirteenth Street
Central Milton Keynes
Buckinghamshire
MK9 3BP

☎ +44 (0) 1908 666276

✉ mail@davidlock.com

🌐 www.davidlock.com

amendment would address the above issue, we wish to retain the right to further contribute to the examination of the plan should that prove necessary.

Please note that the above representation relates only to the Medway Works site.

Yours faithfully,

ARWEL OWEN
PARTNER

Email: aowen@davidlock.com

cc: Tarmac Cement and Lime Ltd
Lafarge UK Holdings Limited