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Subject: Proof reading comments for the Pre-submission Draft Kent Minerals and Waste Local Plan (2024-39)
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Good morning.

EDC are currently finalising their formal comments to the Regulation 19 consultation for the Pre-submission Draft Kent Minerals and Waste Local Plan (2024-39).

As I read through the draft document I thought that I might just note some proof reading level comments to assist as I read. Clearly I realise I may have misunderstood in places so please do excuse my errors. Feel free to ignore comments of course! I haven't particularly been back through these to recheck them.

Please note these are not formal comments from EDC to the Reg 19 consultation. These are informal officer comments only.

GENERAL COMMENT Listing within policies is inconsistent. Some policies have bullets points as 1., 2., 3., etc, others as a), b), c),. CSW19 uses I., II., III. DM 9 and DM 14 have no numbering for lists. The hierarchy between each policy numbering is not consistent where there is more than one list within a policy.

1.3.9 amend '...from Folkestone to river Dart.' To be '...from Folkestone to the River Dart in Devon'. Capital for River and then consistent then with sentence re '...from Felixstowe in Suffolk to near Folkestone.'

Should 1.5.2 and 1.5.1 be swapped over as 1.5.2 clarifies NPPF and NPPW and the title of the section is 'Planning and Permitted Interface' so these documents should be identified straight away after the title?

1.5.1 first bullet – missing the word 'if''seek to establish **if** the development...'

1.5.1 Would it be beneficial to clarify that the bullet point list is only concerning pollution.... 'in respect to pollution the County Council and its partner planning authorities will:' etc.

1.5.1 last bulletwording doesn't work currently? Full sentence (purple) reads "When determining planning applications, local planning authorities establish whether a development should go ahead in the particular location proposed. In arriving at its decision, the County Council and it's partner planning authorities will:...Where any significant issues are identified, we it is recommended that other consents needed, such as environmental permits, be sought in parallel to submission of the planning application

so that any issues can be resolved as early as possible.” Once amended maybe the purple text needs to be added to 1.5.2?

1.5.2 Is not very clearly drafted. It doesn't say that it relates to the determination of planning applications. Can 'and the impact of the use' be changed to something more like 'and identify any resultant pollution impacts from such a use.' I.e. Its not 'impact' singular and 1.5.1 has identified that the discussion is around pollution so clarify that in 1.5.2? If the reference to 'the impact of the use' is not just meant to refer to pollution, but wider, can that be made clear otherwise.

1.5.2 Last sentence. Should this refer to planning permission having been granted? A 'decision' could have refused planning permission? The last part of the sentence, add wording to clarify... 'the planning issues should not be revisited through the permitting regimes operated by pollution control authorities in respect to that same development.'

2.1.5 Last sentence before bullets seems to stop short. 'The SE LEP has identified four strategic priorities which reflect the unique geography, assets and opportunities:' Of? The SE LEP area?

2.2.7 – Grammar needs correcting. 'Whilst the LNRS is not expected to be a constraint to development, they will be an important source of evidence for local planning and public authorities will have a duty to "have regard" to the LNRS.'

2.2.7 Sorry, grammar. Commas. 'At the time of writing, the secondary legislation and statutory guidance relating to LNRS that will provide the detail and instruct the commencement of their development is awaited.'

2.3.15 move 'quarries' after 'Hythe Formation' and before the bracket.

2.3.16 move 'deposits' after 'silica sand' before the bracket.

2.4.3 Restructure sentence? From... 'Areas with clay geology, outside water Source Protection Zones (SPZs) which are not liable to flooding, may be suitable for future landfill.' To maybe... 'Outside of water Source Protection Zones (SPZs) areas with clay geology, which are not liable to flooding, may be suitable for future landfill.'

2.4.4 Sorry I don't understand. 'Some of Kent's mineral workings are used for waste disposal.' Does this mean once mineral extractions have finished. Historic mineral sites? Are subsequently used?

2.4.4 Is the second sentence related to the first sentence?

'Some of Kent's mineral workings are used for waste disposal. At the time of Plan preparation, there are two non-hazardous landfill sites and two hazardous landfill sites.'

Is it because the landfill sites are in historic mineral workings sites? Its not clear currently how these flow together?

2.4.5 the first sentence refers to EfW but EfW isn't explained until the second sentence.

2.4.5 Grammar. 'It has additional capacity not contracted to the County Council available for Local Authority Collected Waste (LACW) MSW from outside Kent.' Redraft? 'It has additional capacity available for Local Authority Collected Waste (LACW) MSW from outside Kent, over that contracted to the County Council, or....'

2.4.8 'Figures 16a and 16B shows the location of key existing ?? facilities.'

Page 62 5.2.8 Second sentence finishes without being complete.

5.2.9 The newly imported sentence needs splitting into 2 sentences.

Heading above 5.2.17 – 'Landwon' needs to be hyphenated to be consistent with the title above 5.2.10. Same within text of 5.2.17.

5.2.17 Second sentence. Change second 'which' to 'that' ?

5.2.25 Comma after 'aggregates'. New insert 'landwon' needs a hyphen for consistency.

5.2.26. Ditto 'landwon'.

5.2.30 Remove comma after 'ground,'

5.11.2 Refers to 'results of the survey'....what 'survey'?....not particularly clear the link to 5.11.1 'prospecting'. In 5.11.2 maybe add ' details of the results of the survey, following prospecting, and implications...'

5.12.1 Last sentence not so clear. Missing some text? 'Policy CSM 12 encourages an increase in sustainable transport modes for minerals and encourages the development of new mineral importation facilities or ??? redevelopment of?? re-establishment of?? facilities that have fallen out of use.

6.2.4 'case by case' needs hyphens?

Policy CSW3 – half way down ... 'New development' – Is this still related to the 'major development above'? or is this non-major development? (I assume so but could be clearer.)

6.3.1 Not make sense? 'The purpose in adopting the principle of net self-sufficiency is not to restrict the movement of waste as such restriction of waste catchment areas could have an adverse effect upon the viability of the development of new waste management facilities that may be needed to provide additional capacity for the management of Kent's waste arisings in accordance with the waste hierarchy.'

6.3.2 Add word 'and'. 'To assess the future needs for waste management capacity in Kent, net self-sufficiency has been studied for the individual waste streams of inert, non-inert (also called non-hazardous) wastes.

CSW6 – a. not capital 'D'

CSW6 Grammar?

Planning permission will be granted for proposals that:

- h. for energy producing facilities - sites are in proximity to **existing or planned** potential heat users.
- i. for facilities that may involve prominent structures (including chimney stacks) - the ability of the landscape to accommodate the structure (including any associated emission plume) after mitigation.
- j. for facilities involving operations that may give rise to bioaerosols (e.g. composting) to locate at least 250m away from any potentially sensitive receptors.

6.8.2 and 6.8.3 and 6.8.5 Just needs consistency? ...this section does have parenthesis around 'other recovery' in some places but not others – including in the title 6.8 and the policy wording.

6.8.4 hyphen for 'non-organic' ?

CSW8 b) is 'shall' the right word?

CSW8 e) non biogenic needs a hyphen for consistency with the pre-amble.

6.9.1 'non inert' some places is hyphenated and some places not. Needs consistency and in Policy CSW9.

CWS9 – 'waste hierarchy statement' needs to be capitalised?

CSW9 point 1. Are 'can be' the right words? 'has been'? Point 2 – needs 'and' at the end?

7.1.1 last sentence finishes short 'Emissions arising from construction include those embedded in the materials used in the development, and low carbon materials should therefore be used.' In new construction?

7. Development Management Policies

7.1.3 says 'development above a certain size' and diverts the reader to a footnote - why not say 'major development' the same as CSW3 pre-amble/policy – then the footnote can be the same as for CSW3.

Policy DM4 change 'NPPF' to 'National Planning Policy Framework'.

Policy DM9 – not sure is this is intended to be a list of items or not? 'provided that:...' would denote it was but the points then have no numbering etc? But it might be that there is just one point so it shouldn't be a list form but just a continuous sentence? Not clear.

Policy DM 14 – list points need numbering. Also should each point being finished with '..., and'

Kindest regards
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