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Our ref: KMWLP Reg 19 Consultation

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By email only to: mwlp@kent.gov.uk

Dear Sir/Madam

PRE-SUBMISSION DRAFT KENT MINERALS AND WASTE PLAN 2024-2039 – REGULATION 19 RESPONSE ON BEHALF OF GALLAGHER AGGREGATES LIMITED

I am pleased to respond on behalf of Gallagher Aggregates Ltd to Kent County Council's (KCC) consultation on their Pre-Submission Draft of the Kent Minerals and Waste Local Plan 2024-2039 (Draft KMWLP).

Gallagher Aggregates (GAL) was established in 1988 and today is a leading supplier of aggregates, concrete and value-added materials across Kent and the wider South-East of England. GAL is part of the Gallagher Group which was founded in 1973 and is one of Kent's largest and most well-known family businesses. The Group has grown organically since then, now providing a wide range of integrated services to support the economy, local communities and environment including Gallagher Groundworks and Civils, a leading groundworks and civil engineering contractor across the South-East of England working in both the public and private sectors and Gallagher Property, a comprehensive land acquisition and site remediation/development service provider for commercial and mixed-use schemes.

Draft KMWLP Spatial Vision and Objectives

GAL broadly supports the overarching Draft KMWLP Spatial Vision and Objectives for minerals and waste in Kent and GAL are pleased to be in the position to make an ongoing, significant contribution to the delivery of both, now and in the future, in Kent and beyond.

As the sole operator of the only two hard rock quarries in Kent (Blaise Farm and Hermitage Quarry) GAL produce up to 1.5 million tonnes of hard rock a year towards meeting demand for construction and maintenance products and eliminating the need for the equivalent amount of non-indigenous materials to be imported into the County and the South-East of England from outside Kent. The prime location of Hermitage Quarry within the County and in relation to the Primary Road Network, coupled with measures including 'backloading' of their core fleet, the co-location of facilities (such as the concrete batching plant) and the switching of their fixed plant to 100% renewable energy, means that they are supporting the need arising from growth in Kent, whilst minimising road miles and reducing carbon emissions.

GAL is part of a family business which was established over 50 years ago. They fully support the Draft KMWLP objective that minerals and waste developments should contribute to the social and economic fabric of their communities through employment, education and recreational opportunities. GAL can demonstrate their longstanding commitment to delivering these very benefits over many years, including through direct and indirect employment, financial support to community projects and charities, skills and

training and careers open days for students, as well as the provision of an extensive network of permissive routes around the Gallagher Estate which GAL have made available for the public to use and enjoy.

GAL fully support the objective to ensure that minerals and waste sites are sensitive to both their surrounding environment and communities and to minimise their impact on them. GAL has a proven track record in demonstrating high operational standards at both quarries in compliance with planning consents and their Environmental Management Accreditation which commits GAL to measuring and improving the Business' environmental impact.

GAL fully support the objective to ensure that waste is managed and minerals are supplied in a manner which is consistent with the achievement of a more circular economy, in line with national planning and waste management policies. GAL's aggregates recycling facility contributes up to 0.5mtpa of recycled aggregates to KCC's annual production target and GAL currently divert 30,000t of hazardous wastes away from landfill into their Manufactured Aggregates plant to create a lightweight manufactured aggregate which can replace natural aggregates in some construction applications. Both facilities are co-located at their Hermitage Quarry. GAL fully support the role of recycled and secondary materials in supplementing the supply of primary aggregates, at the same time recognising that such products have their limitations and will not provide a suitable substitute for all primary raw materials. Such is the case at Hermitage Quarry where the premium limestone resources and masonry stone cannot be substituted by recycled and secondary materials. The impact on the minerals and waste circular economy in Kent would be very significant without Hermitage Quarry, having instead to import hard rock equivalent to current outputs, import hard rock to substitute recycled materials, divert inert waste to other landfill sites on dedicated haulage (rather than via 'back-loading') and divert hazardous wastes to landfill rather than these being incorporated into GAL's manufactured aggregates.

GAL fully support the objective to enable the extraction of building stone minerals for heritage building products which is consistent with national policy. This objective is particularly pertinent given that Hermitage Quarry provides the only viable future source of indigenous rock in Kent and the South-East of England, this Kentish Ragstone being unique to Kent with no comparable alternative material for the construction and maintenance of historic buildings of national and local importance. Kentish Ragstone is critical to the ongoing protection and enhancement of England's historic built environment from the UNESCO World Heritage Site - Palace of Westminster and Westminster Abbey including Saint Margaret's Church - to Kent's own listed buildings and new builds. GAL is required by planning consent to make available annually a prescribed minimum tonnage of building stone. Having grown their masonry business both in terms of specialist equipment and specialist skills, GAL have first-hand knowledge and experience of the investment needed for the quarrying and production of building stone to be a viable prospect.

GAL fully support and themselves have a proven track record in delivering on the objective to restore mineral sites to the highest possible standard to sustainable after-uses that benefit the Kent community and provide opportunities for biodiversity enhancements in line with the requirements for net gain. Of note is GAL's "Our Roots in the Community" project which involves the community in the planting of trees as part of GAL's commitment to high quality restoration following their quarrying activities.

Policies CSM 2 - Supply of Land-won Minerals in Kent and CSM 4 - Non-identified Land-won Mineral Sites

GAL is pleased to note the continued statement of the fact that the only resource exploited commercially to supply crushed rock in the County is from the Hythe Formation (Kentish Ragstone) which is restricted to a narrow band crossing Kent from east to west and that only two ragstone quarries have consented reserves: Hermitage Quarry and Blaise Farm Quarry in mid Kent – both of which are operated by GAL.

GAL supports the Policy CSM 2 approach to determining the shortfall and scale of provision of hard rock to be made throughout the Draft KMWLP period 2024-2039. In accordance with national planning policy (NPPF¹) and guidance (PPG) the identified requirement takes account of the significant increase in the sales pattern of land won crushed rock from the two sites since 2017 which is expected to be sustained.

¹ Department for Levelling Up, Housing and Communities, December 2023

The approach is consistent with the NPPF and PPG which states that such other relevant information should be considered in addition to a rolling average of ten years' sales data when planning for aggregate minerals.

In accordance with the NPPF (para 2019 (c)), KCC is required to plan for a steady and adequate supply of aggregates by *c) making provision for the land-won and other elements of their Local Aggregate Assessment within their mineral plans...Such provision should take the form of specific sites, preferred areas and/or areas of search and locational criteria as appropriate*. Furthermore, planning policies are to aim to *source minerals supplies indigenously* (NPPF para 216 b)). As such GAL agrees that additional sites to maintain the requisite landbanks of land-won aggregates should if possible be identified in the Mineral Sites Plan, with the *presumption that provision will be made by means of the allocated sites coming forward and providing the mineral required at the appropriate time* (KMWLP para 5.4.2). A site allocation should be supported by adequate and proportionate evidence.

GAL is confident that the identified shortfall can be met by allocating new hard (crushed rock) reserves in an updated Mineral Sites Plan sufficient to ensure an adequate and steady supply is maintained throughout the Plan period 2024-2039. GAL endorse the statement in para 5.2.35 that any allocation would need to be acceptable in planning terms and subject to detailed examination. GAL will continue to participate in due process to promote their Nominated Site – “Land South and West of Hermitage Quarry” for allocation in the Mineral Sites Plan as this would be the only option for maintaining future, indigenous land-won supplies of hard rock from within Kent, to serve Kent and the wider South-East of England. GAL maintain that this will enable ongoing, sustainable supply which it cannot be relied upon or assumed will or can be provided from elsewhere or by other means.

GAL notes the provision in the Draft KMWLP Policy CSM 4 for ‘non-identified land-won mineral sites’ to be put forward for consideration where these would be needed to ensure the steady and adequate supply of aggregates in accordance with national planning policy in the event, for example, that an allocation in the Mineral Sites Plan does not come forward as anticipated. However, as set out in national policy, the starting point for the Development Plan is to make provision for the deliverable, sustainable means of meeting the area’s objectively assessed needs in a way which gives certainty to businesses and communities. Such need for certainty is particularly pertinent given that no sites, other than GAL’s, have been Nominated through KCC’s recent Call for Sites process which is evidence that a sustainable, future supply of hard crushed rock cannot be assumed to be available, let alone relied upon, from elsewhere in the County. Furthermore, such need for certainty is of utmost importance as the unique Kentish Ragstone is critical to the ongoing protection and enhancement of the historic environment, nationally and locally.

[Policies relating to the safeguarding of mineral resources, minerals and waste management sites and infrastructure, in particular Policies CSM 5 & 7; Policy CSW 16; and Policies DM7 & 8.](#)

GAL supports the safeguarding of finite, economic mineral resources in accordance with national planning policy. Minerals can only be worked where they are found; commercial hard rock production is confined to the Kentish Ragstone reserves which are unique to Kent and supplied from the only two hard rock quarries in the County and the wider South-East of England which are both operated by GAL. It is vital that not only the current reserves but also the viable potential future reserves are safeguarded from development that could compromise their future availability.

Similarly, GAL supports the safeguarding of existing minerals and waste management sites and facilities in accordance with national policy. Alongside the production of premium rock and masonry stone at GAL’s Hermitage Quarry, the co-location of facilities including inert landfill voidspace, processing plant, aggregates recycling, ready mix concrete batching, manufactured aggregates plant, masonry stone cutting sheds and saws and an HGV workshop enables GAL to reduce road miles and associated carbon emissions, harness opportunities for product innovation and recycle and blend construction products which would otherwise be diverted to landfill, to support the circular economy. It is vital that management sites and infrastructure are safeguarded to prevent any compromise to the delivery of ongoing benefits associated with such a multi-faceted minerals and waste hub and its contribution to facilitating the achievement of a more circular economy.

Lastly, GAL notes and supports the Mineral Products Association response in suggesting amendments to the wording of policies relating to the supply of land won minerals in Kent and the safeguarding of mineral resources and minerals and waste sites and infrastructure to ensure that these policies are 'sound'.

Please do contact me should you require any further information or clarification on this response. GAL reserve the right to make further representations should there be any material changes to the policies in the Draft KMWLP during independent examination of the Plan.

Yours sincerely



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