

Comments

Mineral Sites Plan - Pre-submission Draft (11/01/19 to 08/03/19)

Comment by	Mineral Products Association (Respondent - 1040007)
Comment ID	16
Response Date	07/03/19 09:40
Consultation Point	3.1 Sharp Sand and Gravel (View)
Status	Submitted
Submission Type	Web
Version	0.1

Your contact details will be taken from the "My Details" section on your account. Please ensure this is up to date. Anonymous responses will not be accepted.

Are you commenting as a: . Minerals Industry

Do you consider the Kent Mineral Sites Plan to be:

Legally compliant? . Yes

Sound? . No

Do you consider the Kent Mineral Sites Plan to be
unsound because it is not: . Positively prepared
. Justified
. Consistent with national policy

Please give detail below on why you consider the Kent Mineral Sites Plan to be unsound and/or not legally compliant.If you have a positive comment to make on this section, please use this box.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation as there will not normally be a subsequent opportunity to make further representations based on the original representation at this stage. After this stage, further submissions will be only at the request of the Inspector and based on the matters and issues he/she identifies for examination.

We support the identification of the need to provide for minerals and maintain a landbank of reserves over the whole plan period, including maintaining a minimum of 7 years' supply at 2030. However, the sites proposed for allocation would only deliver an estimated 2.5mt, compared to the identified need for 5.75mt, and so leaving a deficit of 3.25mt.

The Site Assessment process identifies a number of sharp sand and gravel sites that could be acceptable in principle and score relatively well on the RAG assessment in both the Initial Assessment and the Detailed Technical Assessment stage. The 7 'Site Options' taken through the Detailed Technical

Assessment are estimated to have a potential yield of 8.8mt (including the 2.5mt from the 2 proposed site allocations).

Under-provision for land-won sand and gravel (reflecting the LAA rate) is not sound or consistent with national policy:

National Policy: It fails to meet NPPF requirement of 'making provision for the land-won and other elements of their Local Aggregate Assessment in their mineral plans.... Such provision should take the form of specific sites, preferred areas and/or areas of search and locational criteria as appropriate;' (para 207c).

Positively prepared: It clearly fails to meet objectively assessed needs, as set out in the Local Aggregates Assessment.

Justified: Planned under-provision for land-won sand and gravel and an assumption that the shortfall in provision will be made-up through increasing supply from marine dredged sources is not the appropriate strategy. While there may be 'surplus' capacity at wharves for increased throughput of marine dredged sand and gravel, increasing throughput will also depend on other factors which do not appear to have been explored such as availability of dredger capacity and suitability of wharf space. The under-provision, allocation of only 2 sites in close proximity to each other in the west of the County, and reliance on marine sources, may also not meet the needs of the county as a whole and neighbouring areas that rely on Kent for supply. Given the Site Assessment identifies a further 6.3mt of potential sharp sand and gravel in the other 'Site Options' taken through to Detailed Technical Assessment, further investigation of acceptability (including through reviewing options for site configuration and mitigation) should be undertaken with additional allocations to meet the identified need.

Please explain in the box below what change(s) you consider necessary to make the Kent Mineral Sites Plan legally compliant and/or sound. Please be as precise as possible.

The Site Options and their Technical Assessments should be re-visited, including more detailed assessment of mitigation measure including site configuration and phasing, with a view to allocating additional sites (that are acceptable in principle) in other parts of the County to meet the objectively assessed need for land-won sand and gravel (demonstrated in the LAA).

Do you consider it necessary to attend and give evidence at any hearing sessions during the examination?

(Please Note: The Planning Inspector will determine whether hearing sessions are required and, if so, the most appropriate procedure to hear those who have indicated that they wish to participate at the hearing sessions during the examination)

Yes, I wish to speak to the Inspector at any hearing sessions

If you wish to participate at the hearing sessions during the examination, please outline why you consider this to be necessary.

The Mineral Products Association represents the minerals industry

Comment by

Mineral Products Association (Respondent - 1040007)

Comment ID	17
Response Date	07/03/19 10:28
Consultation Point	3.2 Soft Sand (View)
Status	Submitted
Submission Type	Web
Version	0.1

Your contact details will be taken from the "My Details" section on your account. Please ensure this is up to date. Anonymous responses will not be accepted.

Are you commenting as a: . Minerals Industry

Do you consider the Kent Mineral Sites Plan to be:

Legally compliant? . Yes

Sound? . No

Do you consider the Kent Mineral Sites Plan to be unsound because it is not: . Justified

Please give detail below on why you consider the Kent Mineral Sites Plan to be unsound and/or not legally compliant. If you have a positive comment to make on this section, please use this box.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation as there will not normally be a subsequent opportunity to make further representations based on the original representation at this stage. After this stage, further submissions will be only at the request of the Inspector and based on the matters and issues he/she identifies for examination.

The reliance on allocating one additional site to meet assessed needs is not an appropriate strategy given:

- . This only provides a 'surplus' above the identified shortfall of 0.7mt (equivalent to just over a year's supply based on the LAA rate);
- . uncertainty the one option will be developed or deliver the estimated yield;
- . potential demand from other parts of the south east (as evidenced in the Duty to Cooperate report KCC/DTC1 and Soft Sand Topic Paper KCC/SP31)
- . lack of evidence of productive capacity and whether the annual rate of production (LAA) can be met through the Plan period (including providing flexibility for an increase in rate, particularly if wider regional supply is considered);
- . acceptability in principle and relatively positive scoring in the Minerals Sites Assessment of the other soft sand site option.

Please explain in the box below what change(s) you consider necessary to make the Kent Mineral Sites Plan legally compliant and/or sound. Please be as precise as possible.

Further detailed consideration of acceptability (including mitigation measures) of the other site option and its allocation in the Plan, to provide flexibility and diversity of supply and to provide an additional resource and reserve to serve wider needs.

Do you consider it necessary to attend and give evidence at any hearing sessions during the examination?

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Yes, I wish to speak to the Inspector at any hearing sessions

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The MPA represents the minerals industry