



Medway Core Strategy Plan Public Examination 2012

Matter 7: Minerals and Waste

**HEARING SESSION ON
19th JUNE 2012 (AM)**

**STATEMENT BY
MEDWAY COUNCIL**



Matter 7: Minerals and Waste

Matter 7a: Is the CS consistent with national policy particularly in relation to safeguarding of mineral resources?

1. National policy is now set out in paragraphs 142-149 of the National Planning Policy Framework (NPPF) and in Technical Guidance to the NPPF, March 2012. Essentially policy seeks to ensure that there is a steady and sustainable supply of primary minerals and substitute materials to meet society's needs.
2. In terms of safeguarding it requires mineral planning authorities to:
 - Define 'Minerals Safeguarding Areas'; and
 - Define 'Minerals Consultation Areas' – based on Minerals Safeguarding Areas.
3. It also requires them to safeguard facilities for the importation, transportation, processing and handling of minerals, including substitute materials.
4. Dealing with this last aspect first, Policy CS22 (last paragraph) in the Core Strategy provides strong safeguarding for such facilities.
5. In terms of secondary or substitute materials the first part of the policy makes provision for the full regional apportionment (0.8 million tonnes) and makes clear that a subsequent DPD will allocate sites.
6. The three naturally occurring mineral types in Medway that have varying degrees of economic potential are:
 - London Clay
 - Chalk
 - River Terrace Sands and GravelsEach is considered in the Core Strategy. National policy does not require safeguarding for London Clay but safeguarding needs to be considered for both chalk and sands and gravels (aggregate).
7. In relation to London Clay (and agricultural and industrial chalk) Policy CS22 makes it clear that this will be considered in the subsequent DPD, even though there is no formal requirement to do so.
8. In relation to sands and gravels the policy makes full provision for the regional apportionment and identifies safeguarding areas in Figure 7.1. However it does not identify or define a Minerals Consultation Area. The reason for this is that the safeguarding area encompasses all known economic deposits of the material and therefore there would be no purpose to a consultation area as it would be identical to the safeguarded area.

9. The last aspect to consider is chalk and the approach taken is clearly spelt out at paragraphs 7.20-7.22 of the Core Strategy. This concludes that there is no need to identify additional chalk resources at this stage.
10. The only possible reason to do so would be in relation to the consented (but not constructed) cement plant at Holborough in Tonbridge and Malling which is adjacent to the Medway boundary. In this case the planning consent covers an area for chalk extraction adjacent to the plant that has sufficient proven reserves to maintain full production for a period of 35 years.
11. Kent County Council (as adjacent minerals authority) is considering a Consultation Area beyond the limits of the consented area and this broadly doubles the possible area for extraction. This is despite the fact that paragraph 146 of the NPPF only requires a permitted stock of “at least” 25 years to support a new cement kiln.
12. If the Kent Consultation Area were to be made into a complete ‘doughnut’ around the consented site then the northern side would extend into Medway. However it is the Council’s view that this is unnecessary for the following reasons:
 - Far more than the required level of reserved material exists within the consented area and the Kent Consultation Area (approximately 80 years equivalent)
 - The adjoining area in Medway lies within the Metropolitan Green Belt and so any possible reserves are most unlikely to be sterilised in any event
 - Completing the ‘doughnut’ referred to would bring it up to the small settlement of Upper Halling
 - The Chalk is a massive geological unit. It forms the North Downs, as it outcrops in Medway, and extends much further afield. Should the cement industry need further reserves in the future there will be numerous options for meeting a requirement in Medway or beyond.
13. Having taken full account of the specific characteristics and needs of all relevant minerals, substitute materials and associated facilities it is considered that the Core Strategy is fully consistent with national policy in relation to safeguarding.

Matter 7b:

Does the CS set out a planning strategy for sustainable waste management that enables sufficient opportunities for the provision of waste management facilities in appropriate locations, including waste recovery, recycling and disposal, focussing on delivering the key objectives in PPS10, including the movement of waste up the waste hierarchy?

14. The Council considers that Policy CS23 in the Core Strategy does set out an appropriate strategy for sustainable waste management but in assessing the approach taken certain points need to be borne in mind.
15. The Core Strategy, with this and other topics, takes a deliberately strategic approach. In particular it refers to general locations as opposed to specific sites. The allocation of sites for specific uses will be considered in a subsequent DPD, as will the need for development management policies, and the text of the Core Strategy makes this clear.
16. Policy CS23 makes reference to two named locations (Medway City Estate and Kingsnorth) for possible facilities dealing with the “reuse, recycling, treatment and transfer” of waste materials. These two broad locations are large in scale and potentially could accommodate significant new capacity, even though the analysis provided does not indicate any significant unmet need. The facilities being promoted are those required to achieve the movement of waste up the waste hierarchy.
17. The policy also allows for the provision of soil treatment facilities, even though there is no demonstrable demand at present.
18. Finally it also allows for the consideration of new landfill or landraising facilities on “potential disposal to land resource areas” and these are illustrated in Figure 7-3. Again there is no expressed demand for such capacity but the Council has taken a very mature view that all aspects of waste management and disposal should be provided for.
19. As is clear from the supporting text the policy reflects a very detailed analysis that encompasses each major waste category, including hazardous and even nuclear wastes.

Matter 7c:

Does it (the Core Strategy) set out the key elements of the waste planning framework for the area, and is it clear about how strategic objectives for the area and the key planning objectives in PPS10 will be delivered?

20. Each of the objectives in PPS10 is listed in the table below along with how they are addressed in the Core Strategy or will be through subsequent activity.

No.	Objective	Core Strategy Response
1.	Help deliver sustainable development through driving waste management up the waste hierarchy, addressing waste as a resource and looking to disposal as the last option, but one which must be adequately catered for	Makes provision for a range of facilities and technologies that will drive waste management up the hierarchy, while also making provision for disposal as a final option
2.	Provide a framework in which communities take more responsibility for their own waste, and enable sufficient and timely provision of waste management facilities to meet the needs of their communities	Largely a matter for the subsequent DPD and associated development management
3.	Help implement the national waste strategy, and supporting targets, are consistent with obligations required under European legislation and support and complement other guidance and legal controls such as those set out in the Waste Management Licensing Regulations 1994	The introduction to the NPPF indicates that the national waste strategy will be replaced by a National Waste Management Plan "in due course". However the Core Strategy takes account of all current targets as expressed in the Waste Planning Policy Statement that remains in force
4.	Help secure the recovery or disposal of waste without endangering human health and without harming the environment, and enable waste to be disposed of in one of the nearest appropriate installations	The proposed strategy reflects a careful assessment of suitable locations and has been strongly influenced by the proximity principle
5.	Reflect the concerns and interests of communities, the needs of waste collection authorities, waste disposal authorities and business, and encourage competitiveness	The strategy has been responsive to all relevant interests as reflected in the various formal consultation stages and the earlier continuous engagement process
6.	Protect green belts but recognise the particular locational needs of some types of waste management facilities when defining detailed green belt boundaries and, in determining planning applications, that these locational needs, together with the wider environmental and economic benefits of sustainable waste management, are material considerations	Green belt covers a relatively small portion of Medway in this context and provision is anyway made elsewhere for these types of facilities

	that should be given significant weight in determining whether proposals should be given planning permission	
7.	Ensure the design and layout of new development supports sustainable waste management	Essentially a matter for the subsequent DPD and the development management process

21. On the basis of this analysis it is considered that the Core Strategy appropriately addresses this issue.