

**MATTER 7: MINERALS AND WASTE****a) Is the CS consistent with national policy, particularly in relation to safeguarding of mineral resources?**

3.1 The Brett Group made two submissions, which are grouped together as submission 08. In relation to this question, the Brett Group seeks to rely on the following sections of the submissions by Richard Ford (RF) and David Jarvis Associates (DJA):

- para 7.13 of RF
- para 7.14 of RF
- para 7.18 of RF
- CS22 of RF
- para 3.23 on page 4 of DJA
- para 7.17 on page 12 of DJA
- CS22 on page 12 of DJA, para 8.20 on page 14 of DJA
- para 10.72 of page 14 of DJA

3.2 It is considered that the CS is not in accordance with national policy in relation to the safeguarding of mineral resources and in particular with the policies of the National Planning Policy Framework.

3.3 Paragraph 142 of the National Planning Policy Framework advises that minerals are essential to support sustainable economic growth and quality of life. By contrast, mineral planning is barely referred to in the Core Strategy Spatial Vision. The spatial vision simply refers to the gateway function of Medway for the importation of minerals and other materials.

3.4 Given that the Core Strategy is the main LDF document dealing with mineral development, it is considered that this important issue warrants further attention in the spatial vision. It is submitted that the spatial vision should refer to the need for mineral supply, the important role of marine dredged minerals in meeting that supply and the importance of maintaining and developing the capacity of mineral handling and processing plants.

3.5 Section 143 of the National Planning Policy Framework lists matters that local authorities should seek to address in preparing local plans. The fourth bullet point (see 2.6 above) deals with:

- the safeguarding of existing, planned and potential wharfage and associated storage, handling and processing facilities for the bulk transport of minerals;
- the safeguarding of existing planned and potential sites for concrete batching, the manufacture of coated materials and the handling and processing of secondary, recycled and substitute aggregate materials.

3.6 Cliffe Works includes, *inter alia*, a wharf, a rail head, aggregate processing, concrete batching and block manufacturing and is a site of regional significance.

3.7 Kent County Council recommended that policy CS22 should be amended to include a reference to planned and potential sites. As outlined in the Schedule of Proposed Minor Amendments to the Publication Draft, Medway Council specifically avoided revising policy CS22 of the Core Strategy. It is submitted that in order to comply with the requirements of

the National Planning Policy Framework, policy CS22 should be revised to refer to planned and potential, as well as existing, mineral railheads, wharfage and associated handling and processing facilities.

- 3.8 Such a change is particularly important given the existing and potential strategic importance of Cliffe Works for the importation, processing and handling of marine the processing of concrete and blocks. As outlined above, this site is of regional importance for the importation of mineral and has the added benefit of a railhead. This supports the RSS policy to increase reliance on marine dredged mineral and is in accordance with the RSS policy to promote intermodal freight.
- 3.9 The LCA, which is part of the evidence base for the Core Strategy and is incorporated into the Core Strategy by policy CS7, is overly restrictive regarding the potential for developing Cliffe Works. Any proposal for the development, expansion or intensification of the use of Cliffe Works would be within the existing site boundary, would not encroach on the adjoining designated nature conservation sites and would be the subject of a planning application and an appropriate assessment, if required.

### **Conclusion**

- 3.10 **It is submitted that it is unnecessary and premature to restrict the future development of Cliffe as a regionally important, strategic site via the LCA and policy CS7 of the Core Strategy.**