

Dear County Councillor,

Regulation 19 Pre-Submission Plan and Updated Kent Minerals & Waste Development Scheme

I am writing to you in advance of the County Council meeting on 16 July when you will be receiving the report of the Growth, Environment & Transport Cabinet Committee from 7 July 2026, when it was recommended that your draft Regulation 19 Pre-Submission Plan be subject to a period of public consultation for six weeks (July – September 2026).

CPRE Kent is particularly concerned about the proposed allocation of land at Hermitage Quarry, as set out below.

In addition, we would like to draw to your attention that land safeguarded in your Kent Minerals and Waste Local Plan 2024-39 for Ragstone (Limestone Hythe Formation) is at threat of being sterilised by a proposed outline planning application for 1,300 dwellings and associated works on land east of Kiln Barn Road and west of Hermitage Lane, Aylesford (within the Borough of Tonbridge & Malling) – planning application 24/00372.

The allocation of land within your Minerals Sites Plan will result in the loss of Ancient Woodland; and somewhat perversely, residential development on Hermitage Lane will prevent future extraction of Ragstone.

Clearly, a more joined-up approach is needed in order that the County can fulfil its minerals requirements and Tonbridge and Malling Borough Council can meet its housing need, without either having deleterious impacts.

As you may be aware, CPRE Kent objected to the extension of Hermitage Quarry in response to KCC's 2023 Regulation 18 consultation on the draft Kent Mineral Sites Plan.

Specifically, we objected to inclusion of Hermitage Quarry, as a hard rock (Kentish Ragstone) site option on the following grounds:

1. lack of alternatives given consideration before nominating Hermitage Quarry
2. adverse impact on ancient woodland and loss of Priority Habitat deciduous woodland
3. adverse impact on LWS and designed SSSI
4. loss of Best and Most Versatile Agricultural Land
5. adverse impact on PRow
6. adverse impact on a designated Landscape Character Area and setting of the AONB
7. adverse impact on nearby Listed Buildings

The Kent branch of the Campaign to protect Rural England exists to protect the beauty, tranquillity and diversity of the Kent countryside

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8. adverse impact on designated Air Quality Management Areas and residential amenity

I have attached our comments in full.

CPRE Kent remains of the view that there are a significant number of Ragstone quarry sites known to KCC which could be allocated instead, without resulting in harm to Ancient Woodland.

As you know, Ancient Woodland is defined as any area of woodland which has been continuously wooded, since at least 1600AD.

Ancient Woodlands comprise areas that have taken hundreds of years to establish, are home to irreplaceable habitats, wildlife and soils; as well as playing an important role in terms of our recreation, health and wellbeing; and have cultural, historic and landscape value too.

At your meeting on 16 July 2026 we would ask that you:

1. defer consultation on the current Regulation 19 pre-submission of your draft Mineral Sites Plan, to enable deletion of the proposed Hermitage Quarry allocation and to continue the search for an alternative hard rock site; and
2. endorse the comments made by your Minerals and Waste Planning Policy Team on planning application 24/00372 regarding sterilisation of supplies of Ragstone with the identified Minerals Safeguarding Area, prior to the next meeting of the Tonbridge & Malling planning committee on 23 July 2026.

Yours Faithfully,

Andrea Griffiths

Director, CPRE Kent

cc Sharon Thompson (KCC), Bryan Geake (KCC), Robin Gilbert (TMBC), James Bailey (TMBC)