**Kent Mineral Sites Plan 2026**

**Regulation 19 Pre-Submission Draft**

**Response on behalf of Save Capel ("SC")**

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This representation is made by the Save Capel Executive on behalf of SC's members and supporters, in the context of Save Capel's wider engagement with development pressures affecting Capel parish, including its ongoing dealings with Tunbridge Wells Borough Council ("TWBC") on the Early Review of the TWBC Local Plan. Our comments relate to the Pre-Submission Draft Kent Mineral Sites Plan July 2026 ("the Plan") and, in particular, the allocation at Land at Moat Farm, Capel ("Moat Farm"). Paragraph and page references are to those in the Regulation 19 Clean Untracked Version, July 2026.

SC submitted a representation on the Regulation 19 Pre-Submission Draft of the Kent Minerals and Waste Local Plan 2024-39 ("KMWLP") on 29 February 2024 ("SC's 2024 Response"), which addressed the reliance placed by Policy CSM 2 on the Stonecastle Farm Quarry Extension and Moat Farm allocations. SC notes that the KMWLP was subsequently examined, and the Inspector's Report of February 2025 considered this matter directly (Report, paragraphs 45-46), concluding that there was "no evidence that these sites would not be delivered" and that the sites "were found sound following the examination of the [Sites Plan] in [2020]". SC does not seek to re-run that argument in the same terms. This representation instead focuses on matters that are specific to the Sites Plan review now underway, and on evidence and circumstances that have arisen, or would benefit from updating, since February 2024.

## 1) Whether "no substantive changes" to the Moat Farm allocation is itself justified and effective

The Plan states, at the "Have Your Say" section, that "there are no substantive changes proposed to the sites allocated in the current Kent Mineral Sites Plan which was adopted in September 2020." SC notes that a statutory review under Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 is intended to test whether policies remain up to date, not simply to confirm them. SC is concerned that carrying the Moat Farm allocation forward without a substantive reassessment is not justified or effective unless supported by up-to-date evidence on:

- Deliverability — whether any planning application has been submitted, or is imminent, for either Moat Farm or the Stonecastle Farm Quarry Extension since the 2020 Sites Plan was adopted, and the operator's current intentions;
- The continued relevance of the estimated 1,500,000 tonne yield for Moat Farm and 1,000,000 tonne yield for Stonecastle, given the Plan's own acknowledgement (paragraph 3.6) that reserves at the end of 2025 (2.09mt) and the Plan requirement to 2039 (3.02mt) have both moved since the figures relied upon in the KMWLP examination; and
- Whether the Environment Agency's evidence base in respect of contamination in the vicinity of the site (referred to in SC's 2024 Response in connection with Hammer Dyke) and the compliance status of the historic landfill at Stonecastle has been updated for this review.

SC requests that the Council confirms, or make available, the evidence that has actually been reconsidered for this allocation as part of the five-year review, distinct from evidence simply carried over from 2018-2020, so that this can be tested through the examination.

## 2) Traffic — cumulative impact through Capel parish

SC wishes to expand upon a point made in its 2024 Response. Stonecastle Farm Quarry itself lies within Hadlow, Tonbridge and Malling, and is not within Capel parish. However, the Development Management Criteria for both sites confirm that Moat Farm traffic must be routed via the existing Stonecastle Farm Quarry access onto Whetsted Road (page 22: "Mineral must be removed from the site via the Stonecastle Farm site to the north such that access onto the highway network is achieved using the existing and approved access for the Stonecastle Farm Quarry"). Whetsted, and the approach roads serving this shared access, lie within Capel parish. The two allocations therefore function, for traffic purposes, as a single generating unit routed entirely through Capel, regardless of the fact that only one of the two sites is physically located there.

SC is concerned that the Transport criteria for both sites, while requiring a detailed transport assessment under Policy DM 13, do not require that assessment to address cumulative traffic effects arising from:

- The combined HGV movements of Stonecastle Farm Quarry Extension and Moat Farm together (notwithstanding that the sites are to be worked sequentially and not concurrently, the shared access route through Capel would experience sustained HGV traffic across the combined working life of both sites); and
- The separate, and substantial, housing development already committed and further proposed through the emerging TWBC Local Plan Early Review at East Capel and land to the west of Paddock Wood, which will materially increase both the volume of local traffic and the number of vulnerable road users (pedestrians, cyclists, school traffic) using the same local road network in the Capel/Five Oak Green/Whetsted area over a similar timeframe.

SC does not consider that a transport assessment prepared solely by reference to the mineral traffic in isolation, without regard to this cumulative housing-led traffic growth in the same parish over the same plan period, would be effective or would properly reflect the requirements of Policy DM 13 or paragraph 115 of the NPPF (assessing cumulative impacts on transport networks). SC requests that the Development Management Criteria for both the Stonecastle Farm Quarry Extension and Moat Farm allocations be amended to require the transport assessment to consider cumulative impacts with committed and proposed housing development in Capel parish, including the TWBC Local Plan Early Review, and that this be treated as a matter for examination given its direct relevance to soundness.

SC further notes that the Plan gives no indicative estimate of HGV movements associated with the Moat Farm allocation, in contrast to the approach taken for the Hermitage Quarry allocation, where HGV movements are explicitly tied to "lawfully permitted movement levels for the existing site" (page 36). Taking the county-wide 10-year average annual sales figure for sharp sand and gravel relied upon elsewhere in the Plan (0.176 million tonnes per annum) as a proxy for output while Moat Farm is the active site under the sequential working requirement, and assuming an average payload of approximately 20 tonnes per HGV and a 250-day working year, this equates to in the order of 35 laden HGV movements leaving the site per working day, and a similar number of empty return movements, giving approximately 70 additional HGV movements per working day through the shared access at Whetsted while the site is operational. SC considers that an estimate of this order should be provided by the Council, or required at allocation stage, so that the scale of the traffic impact through Capel parish can be tested through the examination rather than deferred in its entirety to a future planning application.

## 3) Water environment and restoration at Moat Farm — welcomed, and to be secured

SC welcomes the explicit recognition in the Moat Farm Development Management Criteria that the site "overlies the gravel aquifer and near the edge of an SPZ3 for a public water abstraction borehole" and the requirement for wet working to avoid dewatering, together with the statement that restoration should not involve raising ground levels above existing levels, given the adverse impact this would have on flood risk, with wetland restoration preferred instead. These points reflect concerns SC raised in its 2024 Response regarding groundwater and flood risk in the vicinity of Hartlake and the wider Medway floodplain.

SC requests that these criteria be secured, not merely stated, at the plan-making stage: specifically, that the wet-working requirement and the prohibition on raising ground levels are carried through into any future planning permission by condition or planning obligation, and that the water quality monitoring regime to be "agreed with the Environment Agency and South East Water" is required to commence prior to any extraction, with results reported publicly on a regular basis given the sensitivity of the SPZ3 designation and the proximity of Hammer Dyke.

## Conclusion

SC considers that the Plan can be made sound in respect of the Moat Farm (and, so far as its shared access is concerned, the Stonecastle Farm Quarry Extension) allocation by: (a) the Council publishing the updated evidence that has actually informed the decision to carry the allocation forward without change; (b) amending the Transport Development Management Criteria for both sites to require assessment of cumulative traffic impacts with housing development in Capel parish, including the TWBC Local Plan Early Review; and (c) securing the water environment and restoration safeguards referred to above by condition or planning obligation rather than supporting text alone.

Consistent with its 2024 Response, SC wishes to participate in any further stages of the Plan's examination, including any hearings as directed by the Inspector, and wishes to be kept informed of its progression through to potential adoption.

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*Submitted by the Save Capel Executive*
*5 October 2026*