

Green Party 

60 Boxley Road
Maidstone
Kent
ME14 2TW

Tel: 01622 808370
Mob: 07970 436029

email: sjeffery@fastmail.co.uk
www.maidstone.greenparty.org.uk

Miss Angela Watts
Planning Applications Group,
Kent County Council,
First Floor, Invicta House,
County Hall
Maidstone,
Kent,
ME14 1XX

Dear KCC Planning Applications Group,

Re: TM/10/TEMP/0025

We wish to object strongly to the planning application made by Gallagher Aggregates Limited (GAL) for the extension of Hermitage Quarry across Ancient Woodland and a Local Wildlife Site.

As supporters of the Save Oaken Wood Action Group we also fully support their campaign and opposing letter to the KCC.

Our concerns fall in to four broad areas: economic, ecological, environmental and archeological.

The economic case for quarrying ragstone and aggregate is poor and has been further undermined by the abolition of the South East Plan, the severe reduction in funding for roads and the general economic climate.

The ecological case is poor with road building contributing to climate change and environmental destruction. Ragstone is not a viable building material and will not meet the requirement of carbon neutral housing due to its poor insulation quality. They do not explore alternatives to quarrying aggregate at Oaken Wood.

The environmental case is undermined by GAL focusing on overturning the designation of ancient woodland, despite all agencies accepting the professional definition. They also attempt to undermine professional opinion as to Oaken Wood's validity as a wildlife site. They make no attempt to understand the impact of removing and replacing the woodland with a fundamentally different wood.

The archeology survey identifies a potentially significant earthwork, yet the planning application takes no consideration of this or how it will deal with other archeology found on the site which could be important given the lack of post medieval ploughing.

Our detailed objections are as follows:

Economic

1. We note that the application was made prior to the abolishment of the South East Plan Regional Spatial Strategy on 6th July 2010. The planning application draws heavily on the SEP for its economic and strategic justification however these are now highly questionable.
2. 4.7 to 4.9 of the Planning Application deal with the regional requirement for crushed rock, which is clearly the essential economic argument put forward by GAL. The lack of a SEP alone calls the argument into question, however with the drastic reductions in funding for road building schemes and the abolishment of the housing targets across Kent, the demand for aggregates is likely to be severely curtailed in the medium term.
3. 4.29 states that there will be “Significant future increases in demand.” For housing. This seems to be based on proposed housing developments within the Thames Gateway project, Ashford and Maidstone Growth Points. The uncertainty of economic growth in both short and medium term suggests that continued growth will not be ‘significant’ in the future and may not be significant in the long term. This lack of economic growth is further substantiated by the peak oil with the associated rising energy costs over the next 5 to 20 years.
4. 4.30 does further noting investment in roads promised by the previous government in April 2010. Since the application road funding has been severely curtailed and there are no government strategies announced to replace this funding at anytime in the future.
5. 4.57 notes the loss of 50 directly employed jobs and a further 70 jobs not directly employed. While the loss of 50 jobs would happen, the application ignores the impact of producing alternative materials on increasing jobs elsewhere.
6. 9.28 states: “Ragstone can only be worked where it is found; it is a valued and finite resource. A need to release new ragstone reserves has been proven. There are existing permitted reserves which are outside of GAL ownership. Whilst these are substantial they are of such poor quality as to be incapable of providing an alternative. An extensive search of the ragstone outcrop has failed to identify a comparable alternative to an extension into Oaken Wood.” However, no need for ragstone has been demonstrated, only a desire to continue to supply ragstone that could be easily replaced by a more sustainable material.
7. The use of ragstone as a building material is shortsighted and finite. Ragstone may be aesthetically pleasing but it is finite resource and a poor insulator. Most new buildings do not use ragstone and there needs to be a shift towards sustainable building materials.

Ecological sustainability

8. 3.36 Claims that “the more hard rock supplied from within the region the closer it is to regional self sufficiency and the more sustainable the mineral supply regime”. This is not a definition of sustainable supply that you will find in any

ecological philosophy as any resource that is single use and non-renewable is not sustainable. Making claim to the quarrying of ragstone and aggregate as sustainable is simply false.

9. 4.49 On alternative sites states: “none were found to provide an acceptable alternative to the proposed extension.” This demonstrates the complete unsustainability of this type of quarrying. By GAL’s own admission there will be a crisis in raw materials in 25 years. Simply providing the quarrying now delays action on finding sustainable alternatives by a generation. Storing this type of problem up for the next generation is unethical and should not be allowed.
10. GAL makes claim in 7.5 to “maximize the use of alternative or recycled materials” within its production methods as part of its overall claim to be a company with sustainable principles. 7.8 to 7.10 deal with the contribution of the mineral industry to climate change claiming that they account for 4mt of CO2 annually. They do not explore the impact of ragstone as a building material and the increased emissions that this causes through poor insulation or the impact on emissions through increased traffic caused by new and widened roads. GAL claim they have little impact on emissions but fail to consider the wider context. It is important to assess the overall impact of the quarrying and what the materials are used for when considering the sustainable principles of the company.
11. GAL suggests that the infill for the quarrying is inert and will not produce methane. GAL do not state what these inert materials are and it seems reasonable to question why these inert materials are not able to be used as aggregate for road building rather than extracting fresh aggregate.

Environmental

12. 5.5 acknowledges that PPS9: “*Ancient woodland is a valuable biodiversity resource both for its diversity of species and for its longevity as woodland. Once lost it cannot be recreated.*” Kent County Council and Kent Wildlife Trust (KWT) are clear in their statements that Oaken Wood is classified as ‘ancient woodland’, yet GAL in point 5.9 questions the validity of the term ‘ancient woodland’ and whether Oaken Wood meet the criteria.
13. 5.29 states as part of GAL’s argument against the ancient woodland designation: “Within the 42ha the Vascular Plant Survey identified 350 plant species of which only 5% (18) were AWI listed in the 2006 guidance. That amounts to one AWI for every 2.2ha.” Their use of statistics is at best inappropriate as just considering this statistic could mean that all 18 are found in each hectare. It is also worth noting that KWT found 4.4 per ha on average.
14. The archeological consultants, Oxford Archeology also confirm that “The majority of Oaken Wood therefore meets the Natural England definition as a plantation on an ancient woodland site.” 6.1.8
15. We think it wrong for GAL to argue that Oaken Wood is not ancient woodland in the planning application. The designation is not for GAL to decide, but for Natural England. Unless the designation of ancient woodland is rescinded outside, and in advance of the planning application and not due to lobbying by developers, the

designation should be considered as agreed for the purpose of planning decisions.

16. In 5.19 there are claims that KWT did not properly assess Oaken Wood as a Local Wildlife Site when it gave it that status. However in 9.29 they state "Oaken wood is a Local Wildlife Site designated due to its size and the presence of ancient woodland." It is clear that GAL are confused about this designation too and fail to accept KWT's professional opinion.
17. Environment Statement appendices 3 to 13 were produced by KWT, yet Gallagher Group are listed as a corporate sponsor of KWT. This conflict of interest is not noted in the planning application and GAL should commission further wildlife surveys to ensure that there can be no concerns about the independence of the report.
18. Even assuming the wildlife surveys are correct, there is a complete disregard to the immediate impact on the fauna in Oaken Wood that the quarrying will have. Simply replacing the coppice with indigenous species will not mitigate for the disruption to the species living in the wood and it will not provide a similar home once the area is replanted.

Archeological

19. The desk based survey has identified what is likely to be a late prehistoric or Roman enclosure (OA 102 and 103) . The fact that this monument was identified using LiDAR (a technique which charts topographic variation) necessarily means that the monument is extant as earthworks. This is unusual in Kent and potentially significant. It also suggests that the monument and any associated features could be well preserved. In fact GAL's own desk based assessment makes the point that the area has not undergone significant mediaeval and post medieval ploughing (4.1.1) as has affected much of Kent's archaeological remains.
20. We question the desk based studies assessment of the moderate potential for late prehistoric and roman when that same study says

'One feature that stands out prominently on the plots of the LiDAR data is the possible enclosure OA 102/103, located on a natural hillock between two gullies in the southern part of Oaken Wood. The curvilinear bank defining the west edge (OA 102) is visible on the ground as an earthwork up to c 0.60m high and c 30m long, placed at the top of a relatively steep slope to the west.

and

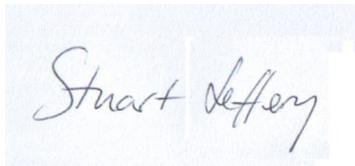
'The two features thus appear to form a roughly oval enclosure c 130m long by up to c 100m wide, which takes advantage of natural topography. The origin and function of this enclosure is uncertain: it is perhaps unlikely to be of Medieval or Post-Medieval origin but it is possibly of Later Prehistoric or Romano-British origin as its form and size are closer to enclosures of the latter periods rather than the former.

21. This favours a prehistoric or Roman date for the enclosure. There has been no effort to understand the nature of the monument or its significance. Given this information we feel that Environmental Impact Assessment has not provided adequate information on the significance of the archaeological remains identified using LiDAR.
22. As no other archaeological methods have been used, the potential for archaeological relics that do not exist as earthworks (in fact the vast majority of archaeological relics) remains. It is entirely possible that archaeological remains associated with the monument structure are present but the Impact Assessment has made no effort to discover presence or absence.
23. Finally, the planning application does not mention how archeology will be dealt with should it be found. This is of deep concern to us.

Summary

The application suggests that it is the haddock and by-product of the ragstone crushing that make Hermitage Quarry and therefore Oaken Wood quarry economically viable, i.e. it is the products for cement and aggregate that are profitable, rather than the ragstone. The application suggests that Blaise quarry could supply ragstone for historic restoration and given that ragstone is not required for new buildings, there seems little requirement to cite the quarry on Oaken Wood.

We therefore urge you to refuse this planning application.



Stuart Jeffery
Coordinator for Maidstone Greens – 60 Boxley Road, Maidstone, Kent ME14 2TW



Keith Taylor
Green Party MEP for the South East Region – Suite LG1, 344-354 Gray's Inn Road,
London WC1X 8BP

pp. Hazel Dawe

Hazel Dawe
Chair, Kent Green Party – 27 Audley Avenue, Tonbridge, Kent TN9 1XF