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Mike Taylor, Chairman Borough Green Parish Council

The current Kent Mineral Plan shows existing reserves of Soft Sand will be exhausted well within the plan period that runs to 2039, with a shortfall of 2.15 million tonnes. This is based on an averaged annual usage over the past 10 years with a 18% increase giving 568,000 tonnes per annum (0.568Mt/pa)

This rate of use with a starting reserve of 7.714 million tonnes will result in a shortfall over the plan period of 2.5mt. KCC as the Minerals Authority hope that soft sand excavations at Chapel Farm at Lenham will be commenced in 2027, yielding a further 3.2 million tonnes. This will address the supply shortfall resulting in a theoretical surplus of 0.7mt.

But there are several important Risk Factors to be taken into account:

1. It is unknown what proportion of soft sand will be building sand, and how much silica, which cannot be used for building purposes. That can only be established during excavation.
2. The Kent Mineral calculation of future Soft Sand requirement is based on a modest increase of 18% based on known usage between 2013 & 2022. During that same period TMBC built out an average of 445 homes per annum (TMBC Draft Local Plan 2025). New Government Housing targets raise that target to 1109 per annum, a 149% increase, and the same order of magnitude increase is happening across the South East, with some Boroughs getting even higher housing targets.
3. Housing Planning Authorities assume that a greenfield mineral site can begin producing immediately approval is granted. A Mineral Authority knows that is not the case - it takes significant amounts of time to install infrastructure such as roads weighbridges, screening plant and offices, and to remove overburden. But even more important is the time taken from the first hole in the ground to excavate access roads, benches, and fully productive working faces.
4. Leaving High Rise building out of the equation, the predominant method of construction in the UK is bricks and mortar. There have been some inroads with timber construction, and several systems of lightweight blocks using solvent based adhesives, but these are minor.
5. Soft sand is a low cost product, and is uneconomical to transport much beyond a local area. Whilst in theory it could be imported from elsewhere in the country by rail, railfreight is already severely constrained by overused infrastructure.
6. Building demand is not restricted to the South East - it is happening right across the country, and local demand elsewhere will mean meaningful imports of soft sand are not likely.
7. Whilst some soft sand reserves are safeguarded from development until mineral applications come forward, there are many known soft sand sites that are at high risk of sterilisation by housing development. This is a particular problem north and east of Platt and Borough Green where significant reserves are available with simple extension of existing mineral workings. It is known that Senior KCC Officers have expressed their concerns to Landowners. The Park Farm Quarry has an extant permission for sand extraction until 2042.

BGSP North is 13.67 ha, Park Farm 10ha, and Nepicar House (safeguarded) on the A20 6ha, a total of nearly 30 ha, slightly larger than Chapel Farm, and based on the Brett Aggregates/David Jarvis yield figures for Chapel Farm,

Borough Green could also yield some 3million tonnes of soft sand, and could start doing that **TODAY**. That can immediately address the risk of expected shortfall

In conclusion, it is absolutely clear that the expected increases in house-building and sand usage will lead to a failure in reserves far sooner than currently estimated, and this loss will be accelerated by sterilising known and available sources with housing development.

I think KCC are being dangerously optimistic in their statement in 5.2.25 below when they say:

" At no time over the Plan period will the supply of soft sand be exhausted ". This statement does not take into account the expected huge increase in house-building and subsequent soft sand demand.

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Extract Kent Minerals Sites Plan 2024 - 2039

Soft Sand

5.2.23 The annual position of soft sand in the County is reported in the Council's Local Aggregate Assessment. Between 2013 and 2022 sales of soft (building) sand from Kent's quarries have increased from around 483,200 tonnes in 2013 to around 574,700 tonnes in 2022. The average 10 years sales of soft sand has also increased slightly, and as of 2022 is 475,038 tonnes per annum (0.475mtpa). If demand were at this level for the rest of the Plan period (2024 to 2039 with a 7-year landbank of 3.325mt maintained at the end of the Plan period) the requirement (based on the 10-year sales average) would be 10.45mt.

5.2.24 Permitted reserves at the end of 2022 were recorded at 5.574mt. The available reserves at commencement of year 2024 are estimated at 5.099mt. The allocation (one site at Chapel Farm, Lenham) of 3.2mt of potentially replenishing resource is identified in the Kent Mineral Sites Plan 2020 and is expected to come forward during the Plan period. Should this site be granted planning permission this would provide a total of 8.299mt of reserves over the Plan period, excluding any windfall sites. This results in an estimated shortfall of 2.15mt in the maintained 7-year landbank to the end of 2039.

5.2.25 Assuming the Chapel Farm allocation comes forward as expected without any windfall sites, this indicates a 7-year landbank (of 3.325mt) to be maintained until around 2036. The estimate of available reserves and sales rates will likely change over time and there is the potential for the maintained 7-year landbank requirement to increase or decrease over time. At no time over the Plan period will the supply of soft sand be exhausted (based on current sales rolling averages and permitted reserves plus potential reserves from the Chapel Farm allocation). In addition, following the Plan's adoption, there is a subsequent statutory requirement to review the Plan every five years which provides future staged opportunities to assess if further monitored supply requirements justify any allocation of additional sites in an updated Mineral Sites Plan. Any allocation would need to be acceptable in planning terms and subject to detailed examination.

5.2.26 It should be noted that there can be a lack of clarity in geology between soft sand and silica sand as they occur in the ground as part of the same geological deposit. In light of this, it is necessary, in consultation with the operators, to determine the degree to which sites identified as supplying soft sand and/or silica sand may supply both materials. This can affect the aggregate monitoring data.

5.2.27 In conclusion, based on 2022 aggregate monitoring data, the position for land-won soft sand is as follows: Soft sand: at least 8.299mt of actual and potential reserves (comprising currently permitted reserves estimated at the commencement of 2024 as 5.099mt plus 3.2mt of resources from the allocated site), and a 7-year landbank of at least 3.325mt. Should the allocated site come forward, this would result in a theoretical shortfall of 2.15mt over the Plan period, though no exhaustion of available reserves during the plan period to 2039 is indicated and no account is taken of windfall sites. In addition, following the Plan's adoption, there is a subsequent statutory requirement to review the Plan every five years which provides future staged opportunities to assess if further monitored supply requirements justify any allocation of additional sites.

Figure 2 - Revised Soft Sand Site Plan Requirements

10-year average figure x Years covered by the plan (18 years, 2019 to 2030 plus 7-year landbank) - Existing Permitted Reserves (estimated when the plan period commences in our case 2019) = Requirement tonnage to be provided over the Sites Plan period

Estimated permitted reserves have been calculated as follows:

Reserves as of end of 2017 = 8.85

Available reserves by the end of 2019 would be reduced by 2 years equivalent extraction (using the 10-year sales average of 0.568mt for 2018 and 2019 extraction)

Available reserves at end of 2019 = $8.85 - (2 \times 0.568\text{mt}) = 7.714\text{mt}$

Therefore:

$(0.568 \times 18) - 7.714 = \text{Overall Plan of 2.51mt requirement (rounded 2.5mt)}$

Attached. Kent Mineral Sites Plan

KMWLP Safeguarding Supplementary Planning Document

KMWLP TMBC Safeguarding Map

Brett Agg/David Jarvis Non-Technical Summary Chapel Farm Lenham