

# BOROUGH GREEN SANDPITS & LANDFILL SITES REPORT

ADOPTED Borough Green Parish Council 1st October 2018 Minute Item.....114 (ii)

Signed..... Clerk to Borough Green PC

Tonbridge & Malling Borough Council's Local Plan depends largely on building 3000 houses on Metropolitan Greenbelt and the Kent Downs Area of Outstanding Natural Beauty land to the north of Borough Green Village, TMBC's justification for development on MGB/AONB land is their Local Plan Building Block Provision of Infrastructure in the form of a "Relief Road" stretching from Darkhill Roundabout on the A25 to the West, and the A20 at Nepicar in the East.

They have made some commitment to ensuring the Relief Road is in place during to housing development, and we will be insisting on an ironclad agreement between multiple landowners to fund that road.

However, we believe there are significant obstacles to be overcome, many of which mean that the 1720 houses and the Relief Road cannot be achieved within the timeframe of this Local Plan prior to 2031, and therefore render the plan unsound.

1. **Ightham Sandpit** requires a huge amount of contamination remediation, estimated at 200,000 tonnes plus.
2. **Borough Green Sandpit** has significant reserves still to be exploited, most notably in the land north of the existing workings and the M26.
3. **Park Farm Claypit** has extant sand and clay extraction permission until 2042.
- 4 **Nepicar Sandpit** has extant extraction permissions until 2028, plus infill. It also has legal problems over access to residential properties that could add a further 10-20 years to the scheme.
5. **H+H Celcon** has HGV number restrictions - remediation access to Ightham Sandpit will severely impact the viability of the Block Factory.
6. **Borough Green Sandpit and Nepicar Sandpit** have HGV number restrictions that will inhibit faster extraction and subsequent landfill.
7. **Ightham Sandpit, Borough Green sandpit and Park Farm Claypit**, and the Nepicar pit each separately block the site north to south, the route of the Relief Road through the site. Each needs to be substantially completed before the Relief road and the MGB justification can be realised.
8. **HGV movements** to finish excavation and landfill the sites will have a severe impact on traffic levels and the AQMA that the scheme purports to be resolving.
9. **Landfill space nationally** is severely constrained, and recycling in landfill sites is a crucially important element.
10. **Building Sand** is a nationally Strategic Mineral, and particularly important to housebuilding at this time. **Current reserves run out in 2023.**
11. There is no evidence to suggest that even if HGV numbers were unrestricted, that the market could receive the volumes of sand involved, nor supply the necessary infill material, even if recycling were abandoned. It must be borne in mind that no local Quarry or Sandpit has ever completed extraction and restoration within the first permitted time frame, they always apply for re-extensions, and many of these estimates are based of pre-recycling policies.

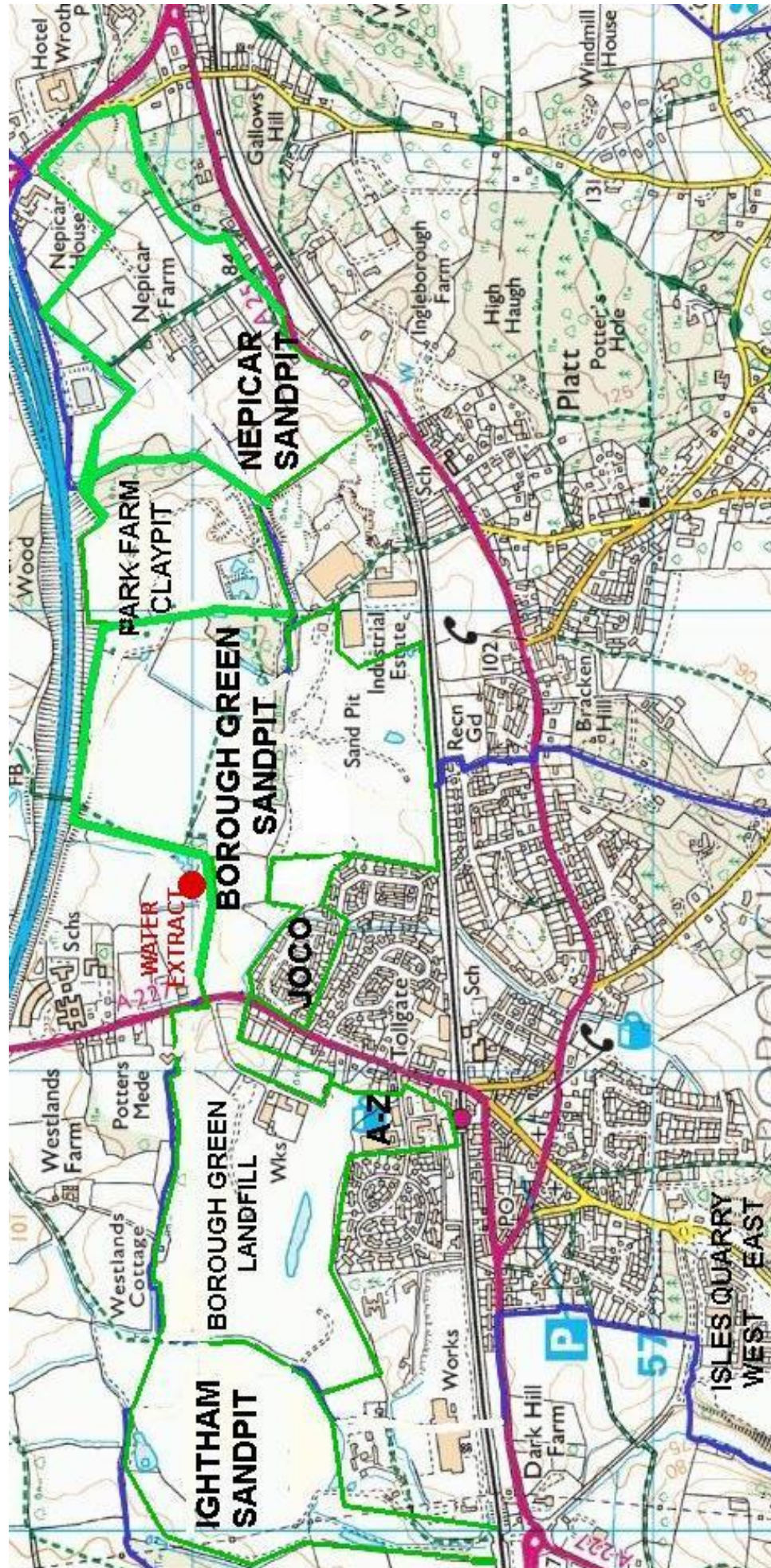
**IGHTHAM SANDPIT** Rear of H+H Celcon Factory Contaminated landfill  
**BOROUGH GREEN LANDFILL** ( Wrotham Rd, Part Historic Landfill still operating today)  
**BOROUGH GREEN SANDPIT** (Off Platt Ind Est, Maidstone Rd, Part Historic Landfill still operating)  
**PARK FARM QUARRY (CLAYPIT)** North of Borough Green Sandpit  
**NEPICAR SANDPIT** East of Platt Ind Est, on Maidstone Rd Platt

**JOCO PIT** (Wrotham Rd, now Tolsey Mead and Eaglestone Close)  
**ISLES QUARRY WEST** (off Darkhill Road, now Hazelbourne Ave, Isles Quarry Rd, Bangays Way)  
**A-Z Site** (Off Fairfield Rd, Formerly Novellos and A-Z factories, now Talbot Way and Pearsall Way)

These last three sites are not within the Borough Green Garden City proposal, but we need to learn from the mistakes made during and since development of these completed sites, to ensure the lessons learned are carried forward and the BGGC proposal protects the new residents, water supplies and the surrounding area.

We need more robust Local Plan Policies on Construction on Historic Landfill Sites, Contamination Remediation, and Developer Viability, and these are discussed at greater length in the attached Landfill Report.



[illegible]



## IGHTHAM SANDPIT

**North East of the H+H Celcon Plant, and owned by them.**

This land was excavated for sand by Kent White Brick from the 1950s, probably finishing about 1990. The land was then operated by H+H Celcon Ltd under TM/87/346.

Landfill was carried out from 1991 to 2000, ostensibly using hassock from Stangate and Isles Quarries, but very little is known about where the fill really came from, and the EA and KCC seem unaware of any landfill permission or monitoring. However, there are strong suspicions, supported by anecdotal evidence, that the fill came from the BP Isle of Grain terminal, and the Greenwich Gas Works, when these sites were decommissioned and decontaminated.

This supposition is strongly supported by the 2006 ES Addendum, a study carried out for the Celcon2 Factory application in 2005 TM/03/02563, which collapsed at Inquiry in 2007. This site investigation highlights large amounts of oily contaminated material, plastic, brick and concrete, pipework, steel, and drums of unknown contents.

H+H Celcon have a current variation application to import Sand from elsewhere for the block making operation.

**HGVs restricted to 340 per day, 170m each way**

*Attached Evidence:*

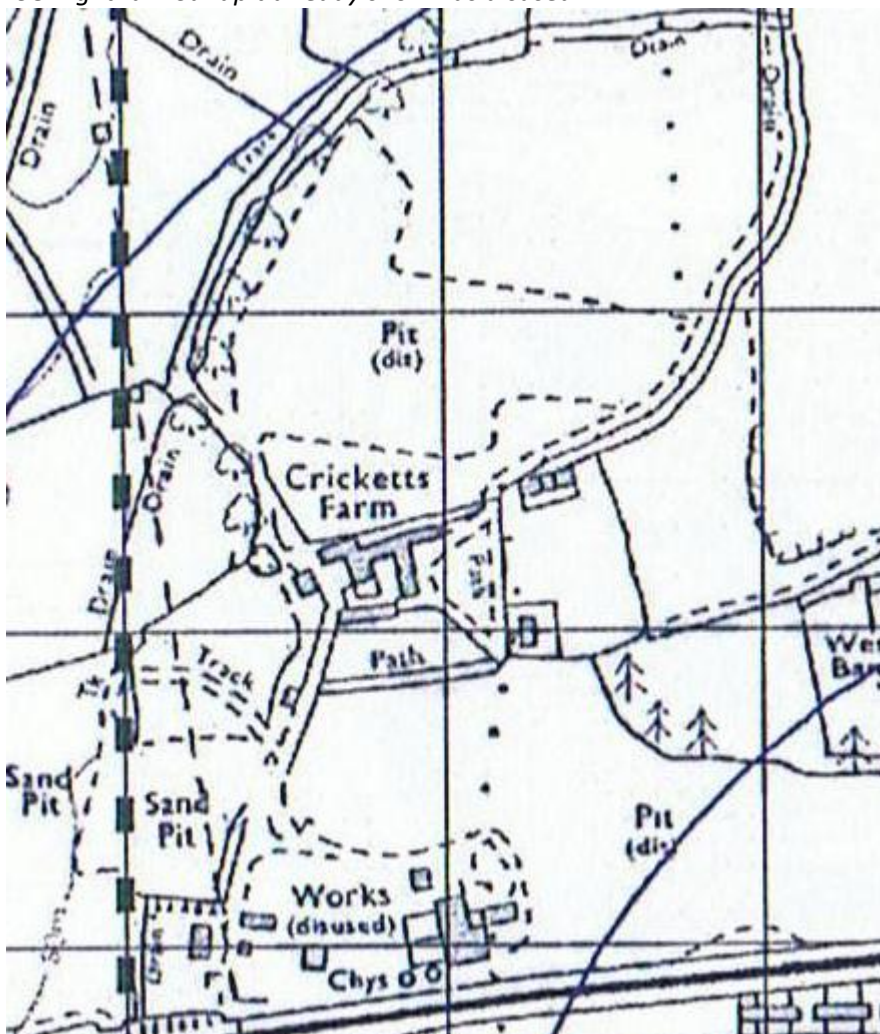
*2006 Southern Testing Ltd "Site Investigations and Risk Assessment Addendum" (TM/03/02563 inquiry)*

*2018 Local Plan Submission Wrotham Parish Council et al*

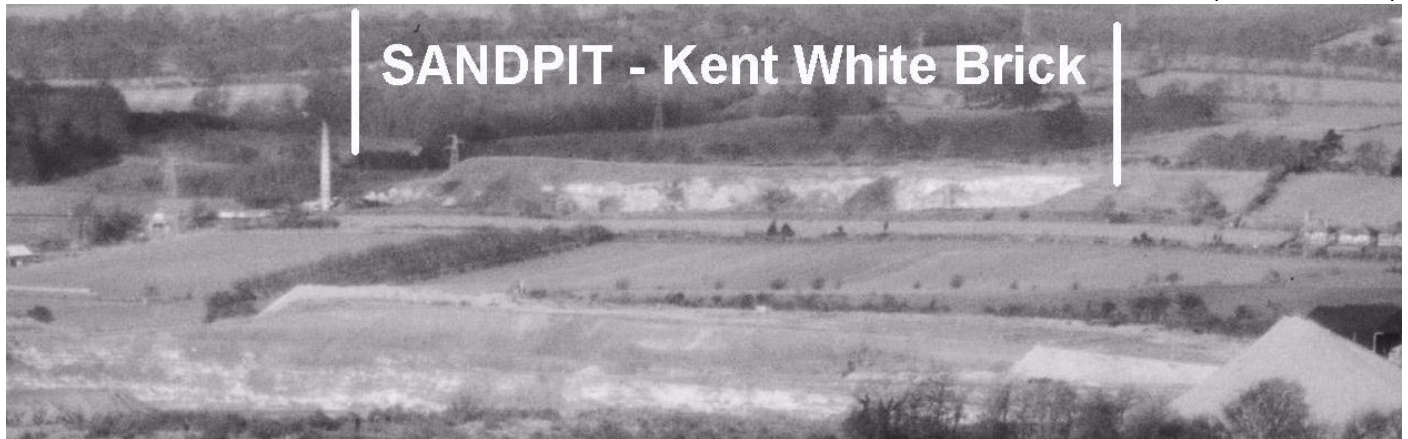
*2006 Barton Willmore covering letter (inquiry evidence.*

*Decision TM/87/346*

*1984 Ightham Sandpit already shown as disused*



(Extract 1929)



Aerial View Ightham Sandpit June 2018 looking East  
Borough Green Landfill immediately beyond that,  
and Borough Green and Nepicar Sandpits in the distance





**(FORMERLY TALBOT SANDPIT,** also known as Borough Green Sandpit Wrotham Rd),

TM/06/01271 allowed a recycling operation to be added to the Hall Aggregates landfill operation subsequently operated by Cemex, until taken over by Robert Body Haulage. Some sand is still being excavated in the north west corner.

Sand excavation moved north and east from this point, following the line of the Wrotham Road (A227) behind Longpond cottages, as far as the Pottery Works where Potters Mede is now. Once they reached that northerly point, excavation moved west following the rear of what became Fairfield Estate, until they met the Kent White excavations at Ightham Sandpit coming east, the boundary between the two pits becoming MR244. The area immediately west of Wrotham Rd, and the area north of Fairfield (built 1948) were landfilled with London and local domestic waste.

Significant landfill still required to attain local levels. Under TM/14/02728 the approval is in force until **2042**, but with HGVs restricted to **182 per day**, 92 in and 91 out.

TM/69/10748 Decision (below)

TM/06/01271 Decision

TM/14/ 02728 Decision



C.D.C.

Form TP.7(b)/69

CLERK'S DEPARTMENT

Rec'd 27 NOV 1969

Ack'd

COUNTY OF KENT

Ref'd to

TOWN AND COUNTRY PLANNING ACTS.

TOWN AND COUNTRY PLANNING GENERAL DEVELOPMENT ORDERS, 1963 AND 1968

Reference Code  
of Application

MX/L/68/271

Notification of Refusal of permission to Develop Land

To:-

Talbot Estates (Kentley) Limited,  
a/c Messrs. Gerald Eve & Company,  
Chartered Surveyors,  
18/19, Savile Row,  
London, W. 1.

RECEIVED

28 NOV 1969

SURVEYOR'S DEPT.

TAKE NOTICE that the KENT COUNTY COUNCIL, the local planning authority under the Town and Country Planning Acts, HAS REFUSED TO PERMIT development of land situate at **Borough Green Sand Pit, in the Parish of Borough Green** - - - - -

and being **the excavation of sand and silica** - - - - -

referred to in your application for permission for development dated the **third** day of **May**, **1968** and that the grounds for such refusal are:-

The greater part of the site lies to the north-west of the route of the proposed Borough Green By-pass and, in the opinion of the Local Planning Authority, the westward limit of excavations in this area should be set at the line of the by-pass in the interests of scenic amenity.



## **BOROUGH GREEN SANDPIT**

**(FORMERLY SMITHS SANDPIT,** also known as Borough Green Sandpit, Platt)

This was originally opened up as a series of claypits supplying local potters and brickworks, already in existence on the earliest maps we have from 1870. Platt Industrial Estate is built on the site of the earliest claypit and brickworks, with further excavations still evident as ponds and pits today, to the north of the Industrial Estate. Botany Woods still contains foundations of another brickworks. At some point sand was discovered under the clay.

Sand excavations began pre-war and moved west from the Industrial Estate, and south towards the Railway. This site is a little more difficult to establish a history, but it was also landfilled in the past before regulation, and is also likely to suffer from non-inert waste and landfill gas.

The current operations are carried out under a series of permissions, TM/71/11061. TM/07/00512 and TM/09/02028. The sand extraction is now augmented by soil reclamation as part of the landfill operation, and the operation extended until 2025. There is an HGV restriction to **60 hgv/day, 30 each way**. **Traffic Survey Films from 28 Nov 2018 to 7 Dec 2018 show these movements are being exceed averaging 132 trips per day, plus average 10 ancillary vehicles, but excluding cars.**

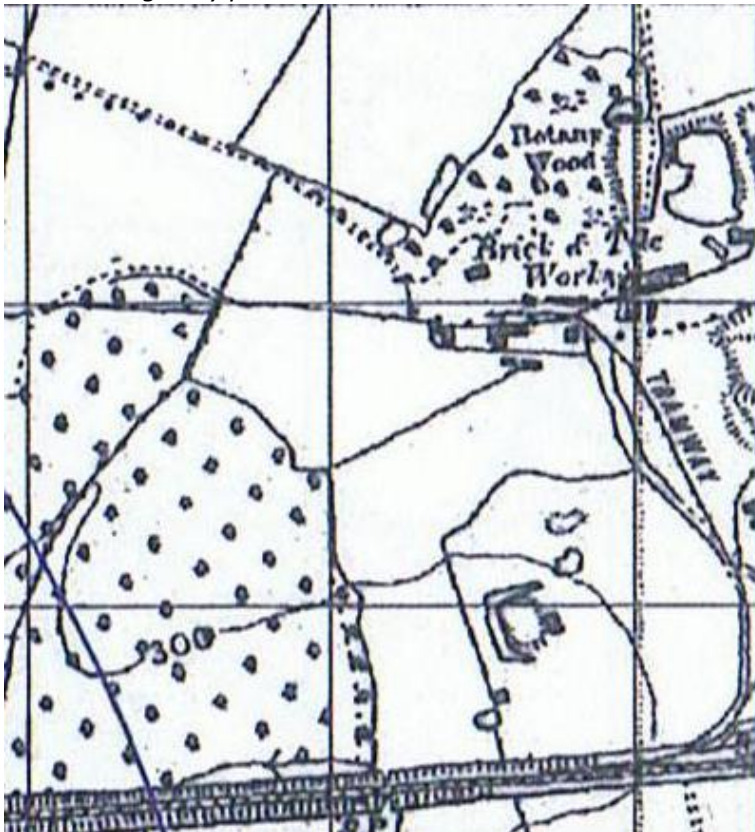
Evidence:

TM/71/11061

TM/07/00512

TM/09/02028 (there are other interim variation applications)

*1870 existing early pits*







BOROUGH GREEN SANDPIT North Platt Ind Est June 2018





**Borough Green Sandpit Landslip - PROW - 23 Sept 2018**









**(OPERATED BY RUGBY CEMENT TO SUPPLY HOLBOROUGH CEMENT WORKS)**

## Time Limits

- Park Farm Quarry Claypit June 2018*



*Site Boundary Plan TM/08/02869 -The south western boundary extends across the top of Borough Green Sandpit*





The decisions refer to a daily HGV traffic of 94 per day , falling to 68, 34 each way.

TM/98/01815 Decision  
TM/08/02653 Decision  
TM/15/01636 Decision  
Civitas Report TM/15/01636

[illegible]

An aerial photograph showing a large-scale construction project for a stadium. The central feature is a massive, bowl-shaped excavation, with its steep, terraced sides revealing layers of earth. The interior of the bowl is a flat, sandy area. To the left of the main excavation, there's a smaller, more rectangular cleared area with some construction equipment and materials. The entire site is surrounded by lush green trees and vegetation. In the bottom left corner, a portion of a white structure, likely the wing of an airplane, is visible, indicating the photo was taken from an elevated perspective. In the top right, a large, modern building with a glass facade is partially visible, possibly a hotel or office building. The overall scene depicts a major engineering and construction effort in a natural setting.

3.12 Figure Two below shows the proposed new phasing which includes the increased extraction area gained by remodelling the quarry. Analysis suggests the remodelled phasing is better able to provide the sand grades for blending to meet customer demand. Clearly there is a better proportion of sand colour in the new phases which is achieved by increasing the size of the phase to provide sufficient sand of the required grade. The re-modelling also maximises the sand that can be won, increasing volumes from 1.9mt to 2.3mt with the new phases.

*Figure Two Sand Volumes by Proposed Phasing*

Phase	Brown	Pale	Orange	Total(tonnes)
1	288,600	650,600	39,500	978,700
2	79,400	163,400	31,700	274,500
3	337,600	364,000	53,900	755,500
4	-	134,100	170,900	305,000
Total	705,600	1,312,000	296,000	2,313,700

3.13 Current production (2013 sales) comprised some **162,000** tonnes of which 96,000t was of blended products and 66,000t unmixed products and subject to market forces this is anticipated to be maintained. At this rate the new phases would be extracted as follows:

*Figure Three Indicative Phase Duration*

Phase	Commence	Duration (years)
1	2015	6
2	2021	2
3	2023	5
4	2028	2

This timetable shows that extraction is projected to finish in 2030 (2028 + 2 years Duration), plus at least 2 years restoration. This timetable is particularly interesting when viewed alongside the Boreham Consulting Traffic Report in the same application, which refers in para 4.7 about the export of sand to the H+H Celcon Block Plant.

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transporting the PFA currently use the A25 Maidstone Road travelling through Borough Green and Platt, and the A228 north to the Isle of Grain.

- 4.7 The proposal to supply Celcon with sand from NSQ seeks only to replace the PFA from Kingsnorth and therefore there would be no increase in lorry movements to the Celcon site or on the surrounding road network. The overall haulage distance for one of the raw materials required by Celcon, could be reduced by approximately 35 kms per return trip between Ightham and the Isle of Grain. Over the lifetime of the NSQ if 20,000 tonnes of sand is supplied for 20 years, at 17 tonne payloads, up to 1.7 million miles of lorry movements could be saved.

We are in regular discussions with H+H about a variety of issues concerning the impact on the village. Just after Christmas (2018) H+H reopened the factory after a £10m refit. Part of the modifications involved were to allow the factory to change from Pulverised Fuel Ash (pfa) where supplies are falling due to coal fired power station closures, to sand imported from Clubbs NSP . Unfortunately, H+H cannot get the process to work with sand , and are falling back on pfa .

This is very important because it puts the timetable for the finish of excavation of 2030, and the start of restoration of Nepicar Sandpit outside the Local Plan timeframe, and Nepicar sandpit completely straddles the Relief Road Route. **If Nepicar sandpit is not completely restored, the Relief Road cannot be built within the Local Plan timeframe, so there are no Exceptional Circumstances for release of MGB**



# KCC Minerals & Waste Local Plan

SOURCE

KCCMWLPCS023-12.pdf

Table 18 P39

*Table 18 - Landbank Calculations for Land-won Sand and Gravel for the Plan Period*

YEAR	RESERVES at Start of Year (mt)	DRAWDOWN during Year (mt)	RESERVES at YEAREND	RESERVES Required for 7 year Landbank
2012	18.674	1.603	17.071	0.00
2013	17.017	1.603	15.486	0.00
2014	15.468	1.603	13.865	0.00
2015	13.865	1.603	12.262	0.00
2016	12.262	1.603	10.659	0.561
2017	10.659	1.603	9.056	2.164
2018	9.056	1.603	7.453	3.767
2019	7.453	1.603	5.850	5.370
2020	5.850	1.603	4.247	6.973
2021	4.247	1.603	2.644	8.576
2022	2.644	1.603	1.041	10.179
2023	1.041	1.603	-0.562	11.782
2024	-0.562	1.603	-2.165	13.385
2025	-2.165	1.603	-3.768	14.988
2026	-3.768	1.603	-5.371	16.591
2027	-5.371	1.603	-6.974	18.194
2028	-6.974	1.603	-8.577	19.797
2029	-8.577	1.603	-10.180	21.400
2030	-10.180	1.603	-11.783	23.003

**8.1.2** KCC had earlier proposed to plan for an additional 10% of land-won sand and gravel over and above the minimum amount required by the apportionment figure. However, it was explained in the Mineral Sites 'Preferred Options' consultation document (May 2012) that it was not possible to identify sufficient deliverable sustainable sites to make provision for the landbank requirement for the whole of the plan period plus an additional 10%. This remains the case. The Mineral Sites plan will make provision for sufficient aggregate for the plan period based upon calculations using the 10 year rolling average sales figure.

**8.1.3** Both the Sustainability Appraisal commentary report and the majority of responses from the Core Strategy 'Issues' consultation (September 2010), supported the provision of an additional 10% over and above the required land bank levels, if conditions allowed. However, at the next consultation stage, the Strategy and Policy Directions consultation for the Core Strategy (May 2011), responses on this issue were more balanced with five people supporting the additional 10% and four people objecting to it, with two people only commenting.

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## Kent Minerals and Waste Local Plan 2013-30 Adopted July 2016

### Kent County Council

**5.2.34** Silica sand is used in a range of applications including the manufacture of glass and production of materials used in construction. An example of a potential local use would be in the manufacture of 'Aircrete' blocks (also known as aerated concrete blocks) where it may substitute for the current supply of Pulverised Fuel Ash (PFA). Currently the existing market need for silica sand is being met by extraction from two

quarries Wrotham Quarry (Addington Sand Pit) and Nepicar Sand Pit. These have permitted reserves in the region of **2.1 mt**. These quarries are identified in Appendix C and shown in Figure 13: Minerals Key Diagram. Wrotham Quarry site has a potential extension area but that lies within the Kent Downs AONB. While the Plan seeks to maintain a stock of permitted reserves, in line with national policy, it is recognised that this may not be possible if it would be inconsistent with policy to conserve the landscape and scenic beauty of the AONB. In light of national policy, the Plan does not seek allocation of sites within the AONB or in locations which would have an adverse impact on the setting of, and implementation of, the statutory purposes of the AONB. Proposals will be considered on their merits against policy CSM 2.

**5.5.6** Geological mapping is indicative of the existence of a mineral resource. It is possible that the mineral has already been extracted and/or that some areas may not contain any of mineral resource being safeguarded. Nevertheless, the onus will be on promoters of non-mineral development to demonstrate satisfactorily<sup>(64)</sup> at the time that the development is promoted that the indicated mineral resource does not actually exist in the location being promoted, or extraction would not be viable or practicable under the particular circumstances.

**5.5.9** Economic land-won minerals that are identified for safeguarding in Kent are sharp sand and gravel, soft sand, silica sand, crushed rock, building stone and brickearth. As chalk and clay (other than brickearth) are abundant across the county, they are not being safeguarded. The mineral resource areas identified for safeguarding are shown in the MSAs in Chapter 9: Adopted Policies Maps. The MSAs are based on mapping of the mineral resource prepared by the BGS. Current guidance advises that mineral safeguarding should not be curtailed by any other planning designation, such as environmental designations without sound justification. The mineral resources within the Plan area are extensive and whilst they continue beneath urban areas they are already sterilised by non-mineral development with very little prospect of future working. Therefore in order for the safeguarding to be practical such areas have been excluded from the MSAs.

#### **Mineral Reserves in Kent without Confidentially Millions of tonnes (mt) <sup>(1)</sup> Restrictions**

Soft Sand	10.6 mt
Soft Sand (non-aggregate uses including silica or industrial sand)	2.2mt
Sharp Sand and Gravel	3.61mt
Sharp Sand and Gravel (non-aggregate uses)	0.50
Chalk (for agricultural uses)	1.9mt

1.



