## **BOROUGH GREEN PARISH COUNCIL**

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**KCC Planning Department** 



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## Land to the West of Ightham Aircrete Works KCC/SCO/TM/0295/2016

The site is in the Mineral Plan (Site 50) as a strategic reserve, and we would not object to the concept of sand extraction for specific onsite use. However we raise the following points:

1. It must be remembered that the site is immediately adjacent to a Listed Building and that places strong constraints on extraction that are not present at other sites. We need to see conditions protecting the building and its setting. The site is also MGB/AONB, but that issue has been dealt with in the Mineral Plan, but bears repetition.

1A. Because of the Listed Building and the MGB/AONB the restoration plan must be to existing levels and to fully replace habitat and flora. Nursery areas must be established to store selected species until restoration.

2. The route of the proposed "Borough Green Garden City" development spine road crosses the path sand would move into the factory. We would insist that the "safeguarded route" of the defunct Borough Green and Platt Bypass is extinguished until excavations and restoration are complete.

3. We would need to be assured that PFA is indeed in short supply as indicated by the applicant. Whilst there is an acknowledged fall in locally produced PFA, this is an internationally traded bulk material, and if plastic whotsits can be delivered from China cheaper than they can be produced here, those same bulk shipping costs are relevant to the international sales of PFA.

4. Whilst we agree that there is a significant benefit in that the proposal would eliminate imported bulk material and its HGV traffic from the roads of Borough Green & Platt, that would not be the case if the excavated material were to be put onto the open market. So we would like to see a condition imposed that absolutely prohibits outside sales of any material from the Western Extension. Any excavated material that cannot be used by the existing factory processes must be stored on site for use in restoration. The conditions enforcing this must be transferrable to any and all future owners of the site.

5. The existence of the 18" HP Gas Main that runs East West alongside the railway line, and the 48" HP Gas Main that runs North /South to the railway line on the eastern end of the site must have protection zones approved by SGN.

6.Use of the Western Extension sand will require significant investment in the factory, we understand some £10m, which will ensure survival of the factory which we support. However, the inclusion of ball mills will increase noise and dust, and new autoclaves to handle the increased length of "cooking" time will increase the area required for the factory, so the eastern end of the site must be removed from the Local Plan housing proposals for the life of the factory, and included as ancillary to the application for sand extraction. The sand extraction request is not valid without the factory improvements to handle the change of material.

**Yours Sincerely** 

Chairman BGPC