

CHARING PARISH COUNCIL (CPC)

Response to
'KCC Mineral and Waste Consultation Document'
August 2011.

Charing Parish Council objects to all sites in the Parish of Charing.

The documents referred to here are KCC's MWDF:

- 'Mineral sites Development Plan Document Options Consultation May 2011', (MDPD).
- 'Waste sites Development Plan Document Options Consultation May 2011', (WDPD)
- 'Minerals and Waste Core Strategy', (MWCS)
- 'Kent Sustainability Appraisal of the Minerals and Waste Development Plan Document Options Consultation May 2011' (KSA) – not issued to CPC until requested late in the day.

The documents should have had mention of previous decisions relating to all these sites.

General notes.

1. Much of Charing and Charing Heath are now perceived to be blighted for years due to the publication of the documents. Many of these sites could have been removed by KCC without much difficulty before ever 'going public' thus saving much of our community the stress it now is suffering.
2. The documents lack specific information which makes informed comment difficult.
3. Many sites are easily viewed from the 'Area of Outstanding Natural Beauty' and 'Special Landscape Area'.
4. Damage to water courses that supply us and the Stour. Any extraction, land-fill, or recycling that is undertaken on chalk or sand-based sites will be a threat to important 'Zone 1 Aquifers' water-courses in the parish that ultimately feed the Stour and Ashford. It is reported by local farmers that we have already lost water courses due to the construction of the M20 and High Speed Rail Link (aka HS1), they fear that cattle in the surrounding fields and we ourselves will suffer.
5. KCC's document states that 'landfill should be on clay beds' – we therefore assume not on sand or chalk!
6. The vehicle movements quoted for all sites do not take into account the ancillary vehicle movements necessary for all the sites - staff, installation, maintenance and replacement of machinery.
7. Within these sites there is archaeology from the Roman and earlier periods that, as yet, many have not been investigated but 'KCC Heritage Conservation Group' and local Archaeological Groups are aware. We have maps from 1639 showing chapels (2) and other buildings – houses etc. - on sites 62 and 69/77.
8. Noise. Smell. Security lights. Security. Dust – properties already suffer one or more of these.
9. KCC's Cllr. David Brazier (Deputy Cabinet Member for Environment, Highways and Waste) suggests (KE Ashford July 21st 2011) that these activities '.....can mean a welcome job boost for local communities'. Who says? It could be said that he should concentrate on the environment and highways and not on jobs. The local population would rather have no new jobs than this wholesale destruction of their countryside. Cllr Brazier goes on to say that 'At the same time, residents can naturally be concerned about the impact these developments will have on their lives'.
10. The maps of the county within the documents do not show clearly the geology of our area. Even 'on line' and enlarged they do not show clearly the geology within the parish – there should have been reference points i.e. parish boundaries.

11. It is expected that any mineral extracted is for UK use only.

12. 'Charing Parish Design Statement' (PDS), formally adopted by Ashford Borough Council as Supplementary Planning Guidance clearly states:

a) Concern for extension of sand and chalk quarrying.

b) To preserve the amenity and landscape of the parish, disused chalk quarries and sand pits should be sensitively restored to e.g. agriculture, forestry or nature conservation and not used for industry or land fill.

c) The change from agricultural land to woodland should be resisted in order to maintain the beauty of the landscape and the rural nature of the parish.

Charing Parish Council fully endorses the document sent by PDS Group to KCC.

SAND Extraction.

1. Insufficient proven need satisfactorily identified.
2. Most sites will see a loss of prime agricultural land.
3. Increase in traffic movements causing further congestion on our country roads.
4. Due to existing heavy traffic, railway bridge at Hook Lane cracking up and will soon have to be closed and rebuilt.
5. Damage/destruction of flora and fauna. Hedges (species rich) already damaged along Charing Heath Road and Forstal Road Lenham Heath.

Site 69/77 This site is a significant part of a site that was refused, at appeal, about 10 years ago. [See APP/W2275/A/02/1085916](#). None of the reasons for refusal have altered in the last ten years therefore it should not be considered this time. Burleigh Farm is on a 1639 map as having eight buildings, little remains above ground. Nothing has been investigated here, the area should be protected. WDPD states on page 8 that "Opportunities,...Name ofrailway line? ! The Ashford to Victoria railway line passes this site on an embankment, this line is regularly closed while engineers are building-up the slipped embankment both here and towards Lenham Heath. **For the above reasons this site should be removed from the document.**

Site 74 is close to private properties, it is adjacent to a 'RIGS' site and its exit is unclear "Exit onto Charing Heath Road" which one – we have two Charing Heath Roads, one off Pluckley Road, the other off the A20 Hart Hill Junction! **This site too should be removed from the document.**

Site 62 (extraction of silica sand)

1. has sensitive site of historic importance being the place that 52 plus members of our forces were killed and many injured just before D Day, REME tell us that the site was 'not completely cleared at the time and has not been cleared since the war'. Families of the deceased still visit the site – at the time Churchill, Monty and Ike visited the site. Remnants of the camp are still visible. The descendants and REME consider the site to be of military importance and it should be preserved as it is.
2. Site 62 also has streams running through it.
3. Silica sand is known to be carcinogenic, the dust will carry on the prevailing wind towards the centre of Charing. During still air the dust will land anywhere within a mile radius.
4. This site has very early settlements within it and to the south there is the oldest building still used in the parish. Newlands Chapel is listed as are the other buildings in this area.

5. This site can be seen from many points in the parish and, at the moment, is a delightful unspoilt valley. The whole area must be protected. **For the above reasons this site should be removed from the document.**

Site 10. Much of the above also is appropriate for this site. Being adjacent to site 62 it may also be a source of silica sand. It is part of the same valley/view and should be considered with site 62. There is no site access shown for this site. If it were to be onto Pluckley Road it would cause further problems along Station and Pluckley Roads, see **Highways** on last page. See **General Notes** 3, 4, 6, 7, 8 and 11 above. **For these reasons it too should be removed from the document.**

Chalk extraction.

Site 16. Beacon Hill Chalk Pit Charing is a site that is unsuitable for the expansion of the existing quarry and the infilling with inert material unit for the following reasons:

1. There is no identifiable need for an inert landfill within the quarry as there are more suitable sites within Ashford that specialise in the recycling of this type of material
2. Vehicle movements would increase dramatically within the locality on roads that are inadequate in width and structure
3. Extending the quarry would be detrimental to the area of outstanding natural beauty that it sits in with adverse effects on the local fauna and flora.
4. Creating a new access onto the A252 would be detrimental to the local area
5. 55 vehicle movements each day would create traffic problems and will create dust and debris in and around the local roads with mud/chalk in the winter or rainy periods that would cause the roads to become slippery causing further hazards.

The chalk pit has had problems in the past with vehicle movements, unlawful use of access through Dencher Wood etc. but of late has been a good neighbour. Local residents are concerned.

In the KCC conditions (see AS/97/360 MR13 of 25th February 1980, it was stated that the AOD 148m specified should be its lower limit "extraction should cease by 31 December 2020, the site restored and planted to achieve minimal restored levels of 148m and a minimum gradient of 1:100 running north to south. Any variation to the levels and specified restoration would give rise for concern," **Levels are already lower than those permitted in the whole of the eastern lobe!** KCC have been advised.

Any excavation below the given AOD 148m may affect water levels and nearby wells relied upon by six neighbouring properties. There is no mains supply in the area.

Despite condition 23 that the only access that should be used is Pilgrims Way, heavy machinery is known to have exited this site via a track way up the side of the westerly bank to a track which has been constructed from the Canterbury Road to the upper western perimeter of the quarry.

Sharon Atkins, author of KCC's 'Sustainability Appraisal' seems to have ignored the conditions placed upon this site, she has also not understood the implications to the low flying 'tug' the single engine aircraft that flies out of the field at the top of the quarry towing a glider or sail-plane. Almost all landfill sites attract a following of gulls, a bird strike at this low altitude would be disastrous for both pilots and their aircraft. With respect we wonder if

Ms Atkins has had sight of the existing documents regarding this site or visited it, noted the proximity of the Kent Gliding Club and seen the problems mentioned above. **For all the above reasons this site must be removed from the document.**

Landfill.

Any landfill is a threat to watercourses. See **General notes 4** above.
See KCC's note on landfill on sand and chalk in **General notes 5** above!

Recycling plants.

Sites 85/86/87 are all within Brett's quarry. Brett's were given permission for sand extraction, and when worked-out, it was to be a haven for wildlife. We now see an interest to partially fill the quarry with waste, a green stuff to compost unit and concrete crushing plant. Within the W&MDF document it is stated that landfill should be within clay sites. Being on sand these uses are obviously totally inappropriate. WDPD states on page 8 that "Operational Constraints... Other waste/mineral sites using the same access to primary road network'. We suggest that this sentence should also include 'mineral extraction'.

Site 85 Green waste to compost.

Hook lane Charing is a site that is unsuitable for the provision of a composting unit for the following reasons:

1. There is no identifiable need for a composting plant within the Charing catchment area as there already planning for an Anaerobic Digestion plant at Sellinge which has spare capacity to take all of Ashford's green waste over the coming years. There are adequate road links to the Sellinge site and Ashford Borough Council or the KCC need to secure long term contracts for this site to secure the green waste composting going forward.
2. Vehicle movements would increase dramatically as the average weight of the compostable material a vehicle would be approximately 8 tonnes and therefore the vehicle movements would be 7500 per annum this equates to 28 vehicle movements each day (in and out). Assuming the compost was removed in 20 tonne loads this would equate to another 12 vehicle movements per day (in and out). Therefore there would be an average of 40 vehicle movements per day plus any associated traffic generated by staff and maintenance vehicles which would then equate to approximately 50 vehicles movements per day. However as composting is seasonal there would be greatly increased traffic flows during the respective seasons.
3. Composting inherently attracts rodents, flies and produces pungent odours that would form a significant nuisance to the surrounding neighbourhood. These are difficult to control in any environment and it would upset the natural balance of nature by attracting other pests including gull's etc.

4. The quarry was granted planning for the extraction of sand and unless there was significant investment by the owners in massive concrete bases and drainage systems that would capture any leachate run from the system this would enter the underlying water courses and have a detrimental effect on the water quality, also the leachate would also contaminate the ground in and around the site.
5. Dependant on the type of composting there could be a need to operate this plant on a 24/7 basis that would also form significant further pressures on the surrounding area.
6. This site sits close to an area of outstanding natural beauty and this development, if granted, would have a detractive effect on the countryside around the area proposed. **For all the above reasons this site must be removed from the document.**

Sites 86

Hook lane Charing is a site that is unsuitable for the provision of a construction waste recycling unit for the following reasons:

1. Construction waste recycling is at present carried out at Sevington in Ashford by the proposer and is a likely candidate for increased tonnage through this facility with its good road links makes an ideal site. There are other facilities within the borough that already carry out this operation commercially.
2. The size of the proposal at 1.2 million tonnes over a 12 year period would blight this section of countryside for this period and beyond for a significant amount of time.
3. Construction waste is normally carried by skip vehicles and the average weight of a container is below 5 tonnes and cubic capacity is approximately 6.1 cubic meters. Therefore using these as a basis to work traffic movements these would be as follows: 1.2 million cubic meters equates to 126 vehicle movements per day based on a five day week (in and out). The road network is inappropriate for this amount of traffic which would have detrimental effect on the surrounding.
4. The size of this operation would need a lot of investment with significant amounts of plant and equipment on site and these would consist of crushers', screens loading shovels which will create dust and airborne debris during the summer months and mud during the winter and despite the best wheel washers available this would be deposited on the local roads.
5. The noise levels created by these machines would present a significant nuisance to the surrounding properties.

In summary the two proposals above would see vehicle movements in excess of 154 per day and the size of the project will have an extreme impact on the surroundings and the local communities. **For the above reasons this site must be removed from the document.**

Site 87 Land fill.

See above General notes:

1,2,4,5,6,8 and 11 **For all these reasons this site must be removed from the document.**

Conclusions and notes.

We believe that all sites in our parish are within 'Aquifer Protection Zones' and are to be considered as within a 'Groundwater Vulnerability' area – both as per WDPD page 9.

Were sites 69, 74, 85, 86 and 87 to be given permission the **average** daily movements from the large site that is now Brett's **will be upwards of 200 vehicles** – using the estimated annual output in tonnage as stated in the documents. In other words approximately **one every three minutes!** It is noted that on some occasions there will be less but likewise some periods will see a larger number of movements – as with green waste being seasonal! None of the quoted vehicular movements allow for staff, machinery and machinery maintenance vehicular movements. **This is totally unacceptable.**

Joined up government Charing is also fighting an application that, if approved, will see an electricity generator using Biogas that will be produced using especially grown green-stuff – on land now used for food production. This site will need approximately 30,000 tonnes of maize per annum. Site 85, it is stated, will take 30,000 tonnes per annum of green waste. Why grow green stuff for one site when there is plenty of green waste for the taking? We are not saying that the Future Biogas site or Site 85 are appropriate for this, they are not. This should be done close to a electricity sub-station on an industrial estate nearer the source of most of the waste, not in Charing.

Highways Charing has suffered the design and construction of the M20 and the High Speed Rail Link and the continuing noise from both. We have had land fill sites and suffered quietly the extraction of sand and chalk. We seem to regularly suffer during 'Operation Stack' and other closures of the M20. As this is being written on Sat. 30th July, following an incident that closed both carriageways, M20 traffic is coming through our parish on the A20 and has done so for over eleven hours! We too have regular accidents on our congested roads and lanes. Pluckley and Station Roads are too narrow for existing traffic with larger lorries mounting pavements to pass each other. Our A20 crossroads at the bottom of the High Street has seen many accidents and several deaths.

One parish should not be expected to take so much aggravation.

We urge Kent County Council to reject all sites within our Parish immediately for all the above reasons.

Cc: to Damian Green MP.

Cc: to Cllr. Richard King, KCC member for Charing and Charing Heath.

Cc: to Cllr. David Brazier, Deputy Cabinet Member for Environment, Highways and Waste.

Cc: to Cllrs. Gerry Clarkson and Dr Robert Taylor, A.B.C. members for Charing and Charing Heath.

Cc: to Cllr. Peter Wood, Leader, Ashford Borough Council.

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