

Mr. Steve Humphrey  
Tonbridge & Malling Borough Council  
Development Control  
Gibson Building  
Gibson Drive  
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West Malling  
ME19 4LZ

**Our ref:** KT/2011/113113/01-L01  
**Your ref:** TM/11/01191  
**Date:** 30<sup>th</sup> August 2011

**Proposal:** **ERECTION OF 177 DWELLINGS, CREATION OF 6.82HA OF OPEN SPACE INCLUDING LOCAL AREA OF EQUIPPED PLAY (LEAP), NEW VEHICULAR ACCESS ONTO HAUL ROAD AND MODIFIED VEHICULAR ACCESS ONTO QUARRY HILL ROUNDABOUT. PROVISION OF ROADS, FOOTPATHS, LANDSCAPING AND ALL ASSOCIATED INFRASTRUCTURE, REMOVAL OF BRICK DECK TO ISLES QUARRY EAST.**

**Location:** ***ISLES QUARRY, QUARRY HILL ROAD, BOROUGH GREEN, SEVENOAKS.***

Dear Mr. Humphrey

In addition to our previous response (dated 12<sup>th</sup> July 2011) to the above proposal, we would like to offer you the following information for consideration when determining this application.

The proposed development lies approximately 250m (at the closest point) north of Stangate Quarry landfill. We currently regulate this site under 2 environmental permits, with the landfill classified as an A4: Household, Commercial & Industrial Waste Landfill

The landfill is no longer accepting waste, but is still generating landfill gasses which are collected and either flared or used to generate electricity at the Gas Utilisation plant (GUP) to the north of Mill Lane.

Our current concerns and priorities for the site are as follows:

### **1) Capping remedial works**

Our immediate concern regarding the site is the required repairs to the cap. There are areas of the site where cracks have appeared in the capping and previous fires within the waste have caused significant craters in the surface, leading to further damage to the capping. We have evidence that these cracks and damage are allowing landfill gas to escape from the site. The cracks and damage also have the potential to cause additional in-waste fires (if oxygen is able to ingress into the landfill) and to allow water through the cap and into the waste, which could increase the production of leachate and the potential for pollution of groundwater.

WRG, the site operators, have prepared and submitted a Construction Quality Assurance Plan outlining the repairs needed to the cap. We are currently working with WRG to ensure these repairs are made as a priority.

### **2) Permitting the Gas Utilisation plant**

The landfill is currently operating under 2 outdated environmental permits, one which covers the majority of the site and the second covers a small area in the north-eastern part of Stangate  
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West. The GUP and landfill gas flares are currently not permitted and the emissions from which are currently unregulated. We are working with WRG towards regulating the site with a modern permit to incorporate the whole landfill and the GUP under one permit. Collating a permit application and associated risk assessments is a timely process, we have agreed with WRG that by 15th September 2011 they will provide, in writing, a definitive date by which they will submit an application to us.

### **3) Restoring the integrity of the bore holes**

We are currently carrying out a national review of all closed landfills and Stangate Landfill has been identified as a high risk site requiring a landfill gas review. The initial landfill gas review has been undertaken and the report has been issued to WRG. This identified that work is needed to improve the state of repair of some of the gas extraction wells and monitoring boreholes and that WRG's landfill gas management could be improved.

As previously mentioned the site has suffered from some internal fires within the buried waste. These fires have caused areas of the landfill to slump, resulting in damage to some of the gas collection and containment infrastructure. The required works will repair the infrastructure and therefore improve the gas collection from within the waste, lead to reduced emissions from the site and increased energy production. Soils will need to be imported to site (subject to the relevant permissions) to complete these works.

In summary the repairs to the cracks in the capping and to the areas suffering from slumping are essential to restore the integrity of the landfill, prevent gas escaping and water entering the waste. These works are required to be carried out as soon as possible and will require the import of soils. With regard to on-going management of the site, we envisage that WRG will need suitable vehicular access to enable the importation of soils for capping remedial works, both to address the recently identified damage and any additional damage caused by landfill settlement in the future. On-going maintenance of the gas and leachate collection and monitoring infrastructure may also require the transportation of large equipment, such as drilling rigs, onto site. The same also applies to the maintenance of the GUP and flares within the gas compound. Large tankers currently collect leachate from the site approximately once a week and this may continue for some time. These on-going management activities are essential to ensuring that the risk of pollution from the landfill is minimised.

Re-permitting the whole site will bring the GUP, flares and their emissions into regulation. The application for this new permit will require the new low Cal flares to be granted planning permission by KCC and may also incorporate details for the final restoration of the site, for which the relevant consents from KCC will be required for the further importing of soils. Please note the final restoration of the site can not be achieved until the site is fully settled and has ceased generating gas.

We trust this information is of use. Please do not hesitate to contact me if you have any further questions.

Yours sincerely

**Beth Axtell**

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