

**BOROUGH GREEN PARISH COUNCIL**  
**Isles Quarry West 171 houses TM/11/01191**

BGPC now accepts the premise of the housing, and is heartened by the direction of the applicant's amendments. The sole housing access onto the Haul Rd will lessen the traffic impact on the southern part of the village, including the Quarry Hill Rd area of Historical Character. Relocating the northern housing to keep the Stangate Landfill access outside the development, and keeping the Hornet and Stangate commercial access onto the Quarry Hill roundabout will eliminate the traffic clash on the site.

However, we still have the concerns below:

**Ground Contamination**

The 2010 Geotech report by URS Scott Wilson highlights chemical and hydrocarbon contamination, suspended pockets of contaminated water, areas of low compaction, and escapes of methane and other gases indicating ongoing decomposition in the landfill.

It highlights the risks to construction workers and future residents caused by these contaminants, and recommends that spoil from utilities is removed from site and replaced with inert fill. It follows that the large amount of planned alterations to the landform may also need similar remediation. The report also recommends all open ground is covered with a 600mm blanket of inert fill and topsoil. These volumes of material will generate 100s of HGV movements. It is entirely reasonable to suspect that most of the land within the site suffers from contamination, and will need replacing, new landforms will not just be a simple matter of moving earth about.

As well as the contamination issues, the Environment Agency also has concerns about the stability of the banks of the River Bourne on the southern edge of the proposal. Collapse could cause serious silting, and contamination of this Medway tributary.

Despite the above, the applicant has not submitted any plan for this remediation, nor any note of the impact on local traffic and Air Quality of this volume of HGV movements.

**Air Quality impact**

The applicant dismisses Air Quality concerns on the basis that advancing technology will allow the growth without any increase in traffic pollution, and that the percentage of new traffic into the AQMA will have a "barely perceptible" impact.

A recent statement from DCLG reminds LPAs that Air Quality is a Material Planning Consideration, and that new development should have a "beneficial impact (on AQ)". The applicants "imperceptible increase" is completely opposite to a beneficial impact.

T&MBC's Policy SQ4 in the MDE-DPD specifically forbids development that will impact on an existing or proposed AQMA, and note that cumulative impact on Air Quality must be included. There is proposed and recent development in Borough Green and surrounding area that will impact on the AQMA, but have been left out of the surveys.

This development is clearly contrary to the NPPF para 124, which states that "Planning Decisions should **ensure** new development is consistent with the local air quality action plan." The Borough Green AQMA is so new that it hasn't yet got an AQ Action Plan.

## **Loss of Employment**

Isles Quarry Housing was enabled by policy H2 in the LDF on the sole grounds of Affordable Housing need, and the wish to stop commercial use of the site. This seems to be completely at odds with the Governments 2012 Growth and Infrastructure Bill which gives employment equal weight with housing.

**Thong Lane Bridge** is part of our heritage as a quarrying village, and we would like to see it preserved. It will also provide a safe pedestrian route from the development to the IQ East amenity land.

**Bus Routes.** We support the bus route along the Haul Rd, where there is room for a safe bus-stop, and note that Quarry Hill is too narrow and dangerous for a bus route or stop, particularly because of the clash with increased pedestrian traffic when the development opens.

## **Conclusions**

We would like to see stringent enforceable planning conditions attached to any permission:

1. That a thorough independent investigation is carried out by a competent authority into site contamination and site stability, with ongoing monitoring during construction and after.
2. That the Applicant produces for approval a remediation plan for any identified contamination.
3. That the Applicant produces for approval a plan detailing proposals to deal with site stabilisation to (a) protect the Bourne Valley from silting and contamination and (b) protect future residents from subsidence and its results, such plan to be also submitted to the EA.
4. That a thorough independent investigation is carried out by a competent authority into the cumulative impact of this and other relevant developments on the new Borough Green AQMA, and that the investigation include the HGV movements caused by any remediation program.

BGPC has doggedly pursued a compromise proposal, that would preserve the Skip Factory, and retain some land in the north for commercial development, with these areas replaced by moving the development further west. Whilst within MGB, the land to the west is exactly the same 60s landfill site as the development, therefore the special circumstances to release that land must apply here .

This would have obvious employment benefits for Borough Green and surrounding areas.

It would allow T&M its needed houses and its New Homes Bonus.

It would allow the applicant the same size development, without the environmental cost of preserving the Bourne Valley, and reducing the remediation requirement in the most heavily contaminated part of the site.

This site will only ever be developed once, we must get it right now.