

**From:** Mark Davies  
**Sent:** 9 Jul 2021 16:42:47 +0100  
**To:** Planning Help  
**Subject:** FW: application 21/00790/AS up to 145 dwellings, country park and sports pitches Wates Tenterden

Kent CC Minerals

Public please

21/00790/AS

No objection

**From:** MWLP@kent.gov.uk <MWLP@kent.gov.uk>  
**Sent:** 08 July 2021 16:56  
**To:** Mark Davies <mark.davies@ashford.gov.uk>  
**Subject:** RE: application 21/00790/AS up to 145 dwellings, country park and sports pitches Wates Tenterden

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Dear Mr Davies

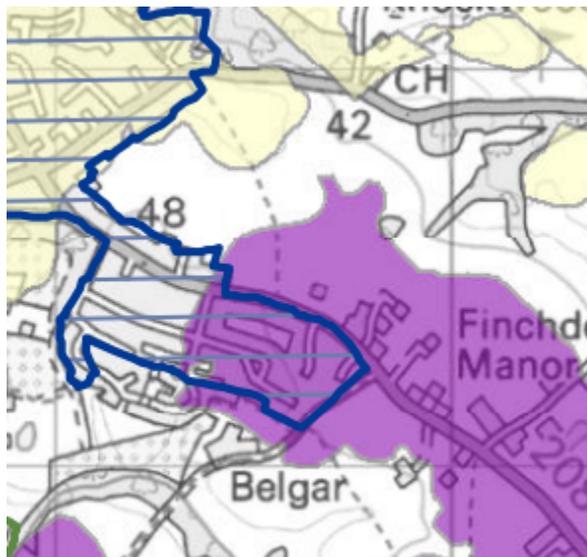
**RE: application 21/00790/AS up to 145 dwellings, country park and sports pitches Wates Tenterden**

Thank you for your email regarding the above; I can confirm that it was received on the 19 May, I apologise that it was overlooked.

I have looked at the application details and have the following comments to make.

I can confirm that the application site is not within 250 metres of a safeguarded mineral or waste facility and therefore does not have to be considered against the safeguarding exemption provisions of Policy DM 8: Safeguarding Minerals Management, Transportation, Production and Waste Management Facilities of the adopted Kent Minerals and Waste Local Plan 3013-30.

With regard to land-won minerals safeguarding matters it is the case that the area of the application site is partially coincident with two safeguarded mineral deposits. These being the sandstones, the Wadhurst Clay Formation and the Tunbridge Wells Sand Formation, as shown by the below extract from the Ashford Borough Minerals Safeguarding Proposals Map of the Kent Minerals and waste Local Plan 2013-30.



-  Sandstone - Wadhurst Clay Formation
-  Ironstone - Wadhurst Clay Formation
-  Limestone - Pauldina Limestone, Weald Clay Formation
-  Sandstone - Tunbridge Wells Sand Formation

Both are of historic importance in that they have been used in the past as sources of building stone. Currently these sandstones are not commercially extracted in Kent by the quarrying industry for a supply of stone for construction. The Ashford Borough Economic Geology Information Note in the Safeguarding Supplementary Planning Document (SPD) states the following:

### ***Wealden Group Sandstones and Limestone (Building Stone)***

*The NPPF 2019 does not require MPAs to plan for the maintenance of landbanks of building stone. Though paragraph 142 makes it clear that mineral resources are essential to support economic growth and our quality of life; and that a sufficient supply of material should be available to provide for the infrastructure, buildings, energy and goods that the country needs. It is emphasised that these materials are finite in nature and their long-term conservation is required, necessitating that this geology is a safeguarded geology. The KMWLP has policy provision to allow small-scale extraction of materials to enable the important vernacular of historic restoration projects to be recognised and for new build projects in conservation areas. Policy CSM 9: Building Stone in Kent sets out the parameters to be met to allow this type of mineral extraction to be permitted. In the Ashford Borough area, the building stone geologies are comprised of the following:*

#### ***Wealden Group (sandstones)***

- Sandstone - Wadhurst Clay Formation***
- Sandstone - Ashdown Formation***
- Sandstone - Upper Tunbridge Wells Sand Formation and Tunbridge Wells Sand Formation***

*The Wealden Group is a complex group of geological units that make up the core of the Weald predominantly stretching across East Sussex and Kent and are colloquially referred to as forming the Hastings Beds, as they can be viewed as outcrop at the cliffs along the coastal area just east of Hastings town.*

*They include, in the Ashford area, the Ashdown Formation, Wadhurst Clay Formation and the Tunbridge Wells Sand Formation (that also is split into the Upper Tunbridge Wells Sand Formation as well as the Tunbridge Wells Sand Formation). The Hastings Beds in turn forms part of the Wealden Supergroup*

*which underlies much of southeast England. The sediments of the Weald of East Sussex were deposited during the Early Cretaceous period.*

***Wadhurst Clay Formation-****The Ashdown Formation is overlain by a predominantly argillaceous (clay/mudstone) sequence the Wadhurst Clay. This unit also contains beds of siltstone/sandstone, limestone and ironstone, which have provided building stone in the past. A number of thin calcareous sandstone beds were used as local building stone in the Tenterden area. The ironstone beds which formed the basis of the famed Wealden iron industry were largely worked from the basal part of this formation, but there is no evidence that they were used to any great extent as building stones. In the Tunbridge Wells Borough this material is found at Sandhurst. It is a safeguarded geology given that it has been quarried in the past to provide building materials, though not widely used.*

*The Ashdown Formation-The Ashdown Formation, which takes its name from the Ashdown Forest in the High Weald of Sussex, typically comprises sandstones, siltstones and mudstones. In the east of the county, the formation tends to be more argillaceous (clay mineral bearing) in its lowermost part and fines up to arenaceous (silica or sand bearing) division in the uppermost 30 to 50m. The clays are identified by their characteristic purple and brick-red mottled nature. In early references, these variations give rise to the division of the formation into the 'Fairlight Clays' and the 'Ashdown Sands'. However, it is now considered as a single overall sandstone formation due to the impersistence of the clays across the Weald, thus the clays are considered as extensive 'lenses' within the formation. Despite this, the variations of clays and sands in the formation are usually marked separately on the maps and records of the British Geological Survey. In its entirety the formation is usually found to be between 180 and 215m thick. In the Ashford area the deposit can be found in the south of the borough around the Isle of Oxney as far north as the outskirts of Tenterden, in the west almost at Rolvenden Layne. The economic material is in the sandstone fraction of the formation that can be used as a quarried building stone.*

***The Tunbridge Wells Sand Formations-****The Tunbridge Wells Sand Formation comprises complex cyclic sequences of siltstones with sandstones and clays, typically fining upwards, and is lithologically similar to the older Ashdown Formation. It has a total thickness typically in the region of about 75m. However, near Haywards Heath borehole data has proven the formation to be up to 150m thick. In the western parts of the High Weald the Tunbridge Wells Sands can be divided into three separate members; the Lower Tunbridge Wells Sand Member (a non-economic geology that is not safeguarded), the Grinstead Clay Member*

*(not an economic geology that is safeguarded), and the Upper Tunbridge Wells Sand Member (that has within it the Tunbridge Wells Sand Formation).*

*The Upper Tunbridge Wells Sand is similar to the Lower Tunbridge Wells Sand. It comprises soft red and grey mottled silts and clays in its lower part, and alternating silts and silty clays with thin beds of sandstones. In the Ashford Borough area, the material is to be found in the south, and exists as a substantial belt stretching from the border with Tunbridge Wells Borough Council in the west to south of Woodchurch in the east. The formation lacks the degree of outcrop that is attractive to climbers further to the west in Tunbridge Wells. The sandstone fraction of the formation is the economic element of the unit, as it can provide a quarried building stone. The Wadhurst Clay comprises predominantly medium to dark bluish grey over-consolidated clays, silts, mudstones, and shales. These lithologies often occur with subordinate amounts of pale grey silty mudstones, laminated siltstones, sandstones, conglomerate, shelly limestones and clay-ironstones. When they become exposed to the elements at the surface, the mudstones often degrade over a short period of time and weather to yellowish brown and greenish grey clays. In Kent, the Wadhurst Clay has been proven to over 70m thick near Tunbridge Wells. In the Ashford Borough area, it is found in discrete areas south of Tenterden and at the Isle of Oxney where it is often in close association with the Ashdown Formation. The sandstone fraction of the formation is the economic element of the unit, as it can provide a quarried building stone.*

*The Ashford Borough area may have been historically important as a source of sandstone for local construction purposes, the County Council has no records of quarrying of these Wealden Formation sandstones in the Ashford Borough Council area. However, BGS consider this material an important deposit for its application as a hard rock building stone. This probably relates more to the 18th and 19th centuries, today there are historic buildings and structures in this area (and in Borough of Tunbridge Wells close by) that require restoration materials. Limited supplies of sandstones for this purpose come from a select quarry operating in East Sussex. Kent apparently no longer has any active quarries that can supply this material. Though given the extensive nature of the outcrop in the Borough, this may occur again at some point in the future. As it is a very specific sandstone type potentially required for historic building restoration purposes. However, volume housebuilding and other development appear not to want to source this material in any substantial quantities.*

Therefore, although the development proposed is not of a minor nature, any prior extraction of any usable mineral would not be practical or viable in all probability.

The applicant has submitted a Minerals Assessment (MA) with the application that examines if an exemption from the presumption to safeguard can be invoked by evidentially arguing that a criterion of Policy DM 7 Safeguarding Mineral Resources should apply. Though it is only required to invoke one criterion to can an exemption under this policy the MA states that criterion 1 and 5 can be invoked. Criterion 1 looks at viability of pro extraction and the MA concludes it would not be viable or practicable to do so. It may be an arguable point with regard practicality, given that the open landscape would, despite the proximity of existing residential properties, some sandstone *may* be able to be quarried from this land. However, given what is understood about the low need for this material, in modern construction material supply chains, it is a reasonable to conclude that any prior extraction would not be economic and the requirements of criterion 1 of Policy DM 7 has been met and the proposal is exempt from the land-won mineral safeguarding presumption of Policy CSM 5: Land-won Mineral Safeguarding of the Kent Minerals and Waste Local Plan 2013-30.

The County Council has, therefore, no minerals or waste safeguarding objections to the proposal.

Yours sincerely

*Bryan Geake BSc Hons (Geol), MSc, MRTPI*

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**From:** MWLP - GT <MWLP@kent.gov.uk>  
**Sent:** 08 July 2021 15:31  
**To:** Bryan Geake - GT EPE <Bryan.Geake@kent.gov.uk>  
**Subject:** FW: application 21/00790/AS up to 145 dwellings, country park and sports pitches Wates Tenterden

**From:** Mark Davies <[mark.davies@ashford.gov.uk](mailto:mark.davies@ashford.gov.uk)>  
**Sent:** 06 July 2021 10:34  
**To:** MWLP - GT <[MWLP@kent.gov.uk](mailto:MWLP@kent.gov.uk)>  
**Subject:** FW: application 21/00790/AS up to 145 dwellings, country park and sports pitches Wates Tenterden

Hello

You should have received a consultation on this application on 19 May 2021. Can you confirm if you have replied to this as I can't find any comments at present on file?

Regards

Mark Davies

Deputy Team Leader

Strategic Applications Team

Strategic Development & Delivery

Planning & Development Service

01233 330252

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