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Dear Mr Cole

**QUESTIONS ARISING FROM STATEMENT OF COMMON GROUND WITH
KENT COUNTY COUNCIL MINERALS AND WASTE (ED/23)**

1. The above document responds to section 2 of our letter of 14 May following the hearings in weeks 2 and 3 (ID/06). However, we have some questions to raise in relation to Site S2 which is covered in Appendix B.
2. In particular we wish to have some further information to respond to the matters set out in the second paragraph of section 2 and specifically the economic value of the minerals likely to exist, whether they are required to maintain supply and the viability and practicality of extraction. More specifically:
 - (i) Because of the proximity to residential properties and hotels it is maintained that the scope for extraction activities would be reduced by the likely requirement for a buffer zone of as much as 100m in width. However, this would appear not to affect any resources in the central part of the site. Based on experience of other soft sand operations within Kent would any buffer zone have to be as much as 100m in width or is the figure of 35m more realistic?
 - (ii) What would be the actual effect of any buffer zone on the viability of an extraction operation? Clearly a reduced area would lower the potential economic benefits but they may still be lucrative given that the Sandstone (Folkestone Formation) is said to be important as a source of building and asphalt sands. Is there evidence from recent operations across the county that indicate the value of the reserve in relation to the area that could be worked and therefore whether it would be an attractive proposition for mineral companies?
 - (iii) Paragraph 145 of the National Planning Policy Framework refers to maintaining a steady and adequate supply of aggregates but we have nothing to indicate whether sites such as this are important in this respect. Is there any information about the stock of reserves in Kent over the period of the Minerals and Waste Local Plan and is there a 7 year landbank of sand?
 - (iv) One of the exceptions under Policy DM7 at 3) indicates that planning permission can be granted for non-mineral (residential) development if

the minerals can be extracted satisfactorily beforehand without affecting deliverability. Given that the deep extraction likely to be necessary would delay any housing from coming forward and hence its deliverability how can this criteria apply in this instance?

3. It would assist us if answers to these questions in conjunction with the County Council could be given by Friday 22 June. If there is likely to be any difficulty in meeting this deadline then please let us know via the Programme Officer.

David Smith

Steven Lee

INSPECTORS

14 June 2018