

Our ref: SDB/ST18667/03

Date: 25th March 2022

Your ref:

Mr Bryan Geake
Environment, Planning and Enforcement
Kent County Council
Invicta House
County Hall
Maidstone
ME14 1XX

Dear Mr Geake

**Land at Swanstree Avenue, Sittingbourne: Mineral Resource Assessment
Swale Application reference: 21/505498/OUT**

I refer to your consultation response to Emma Gore dated 12th November 2021 which relates to the above planning application. I note your comments that our Mineral Resource Assessment did not include any details of a site investigation. My client has commissioned a site investigation to obtain samples which have been submitted to a specialist ceramics laboratory (Lucideon) to determine whether the material is of a quality which is suitable for commercial brickmaking.

I have attached the report prepared by Lucideon. As you can see from the text accompanying the photographs in Chapter 3, the brickearth is approximately 1 metre thick and its base is approximately 1.5 to 2 metres below the surface.

The report states in the Summary on page 3 and the Discussion on page 20 that “Bricks produced from this clay would be of relatively low strength compared to currently commercially available products.”

Modern bricks are made and marketed in named ranges or brands and each brick in a given range has to meet appropriate standards such as strength, insulation properties, colour etc. The bricks in a particular range are made to very precise mixtures of brickearth to ensure that they all meet the specific performance requirements of a particular range.





The deposit of brickearth on this site is a very small quantity because it is very thin and covers a very small area. Given the industry's preference for large quantities of clay with uniform characteristics, and the fact that bricks produced from the clay on this site would be of relatively low strength compared to commercially available products, it is reasonable to conclude that this clay would not be of commercial interest to a brickmaker.

On the basis that the brickearth mineral deposit within the site is not of appropriate quality for commercial brick production, we consider that the release of the site for housing, as proposed, complies with Policy DM7 of the Kent Minerals and Waste Local Plan. In particular, it complies with criterion (1), which supports the release of land for non-mineral development where the deposit is not of any commercial value.

I trust that this meets your requirements for reasons why prior extraction of the brickearth is not required. Please note that this letter and the Lucideon report will be formally submitted to the local planning authority. If you have any queries, please feel free to contact me.

Yours sincerely

for Wardell Armstrong LLP

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