SEEAWP

South East England Aggregates Working Party

Technical Secretary: **Richard Read BA. MRTPI**

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Tel: [redacted] **Email:** [redacted]

[redacted]

Central & Eastern Berkshire Authorities

Via Email

29 December 2019

Dear [redacted]

Central and Eastern Berkshire Authorities (CEB) Joint Local Aggregates Assessment (LAA) 2019

Thank you for consulting SEEAWP on the draft CEB Joint LAA.

At the meeting of 14 November 2019, SEEAWP considered the report 19/05 on the LAAs that had been submitted and a full discussion took place. An abstract of the draft Minute is attached with a copy of the notes taken at the Meeting, which I hope are helpful in finalising the Joint LAA.

As you were present at the meeting you are aware that no significant issues concerning the LAA were discussed.

SEEAWP's role in the preparation of LAAs is to provide advice and I hope that when the CEB Joint LAA is finalised you consider points mentioned in the draft Minutes etc.

If you have any queries please contact me

Yours sincerely,

[redacted]

Richard Read
SEEAWP Technical Secretary

Abstract from the draft Minutes of the SEEAWP meeting 14 November 2019

Attendees:

[redacted]

Chairman
SEEAWP Technical Secretary
SEEAWP Secretariat
Hampshire/JCEB/IOW
West Sussex
Surrey
Surrey
Oxfordshire
Oxfordshire
East Sussex
Kent
Buckinghamshire
SDNPA
West Berkshire
Milton Keynes
Minerals Products Association
Brett
BAA/Summerleaze
Tarmac
Cemex
Grundons
Day Group
Aggregate Industries
Crown Estate

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3. Local Aggregates Assessment 2019

The Secretary advised that the Miscellaneous Notes (as amended by the mineral planning authorities and appended) be the basis of the LAA presentations and taken as read.

The Secretary referred to some general issues:

1. LAAs should include LAA Rates for all supply options as advised in the Guidance
2. LAA Rates should not be treated as confidential as they are based on average sales (subsequently modified in some cases) and can be published in LAAs including the summary table (Dashboard).

<u>Buckinghamshire County Council</u>

[redacted] explained the Buckinghamshire growth forecasts reflect the district development growth forecasts.

[redacted] was surprised that sales are as low as reported as the Berryhill Farm sales are approximately 800,000 tonnes. [redacted] stated that the Hertfordshire side of the site has been extracting more than the Buckinghamshire side.

[redacted] queried why SSG data is not published, but [redacted] stated that the LAA uses combined S&G data to respect confidentiality. The Chairman suggested that a footnote be added to the table.

The Secretary added that the LAA did not take into account post 2018 information including the impact of the Buckinghamshire Mineral Plan adopted earlier in 2019. [redacted] said the LAA would be the last LAA for Buckinghamshire County Council (Buckinghamshire would be a unitary authority in April 2020) – this should be added to the conclusion.

The Chairman asked that that a LAA Rate for Recycled/Secondary Aggregates (R/SA) be included.

<u>Central and Eastern Berkshire (CEB)</u>

[redacted] explained how the LAA rate was calculated, she added the R/SA Rate would be transposed from the text to the Dashboard.

[redacted] asked about soft sand resources and [redacted] responded a soft sand study couldn't find an adequate resource.

<u>East Sussex</u>

[redacted] explained that there is insufficient data to calculate a 10-year average sales as a basis for the LAA Rate. Furthermore the SSG Rate is halved as 50% of material goes to Kent.

[redacted] challenged the logic of this approach. [redacted] stated that historically when working out the landbank it has been divided by 2, and they feel that it's a fair representation of what is happening. However, [redacted] added that Kent seem not to have adjusted their figures to reflect this.

[redacted] explained that review of the Minerals and Waste Plan was underway and the (halved) SSG LAA rate represents the amount which needs to be provided for the Plan Area. There is an indication that the Plan Rate may need to double the LAA Rate.

[redacted] queried some errors in Table 5 in the Annual Report. [redacted] agreed.

There was further discussion on this matter and the Chair stated that there needs to be a reconciliation or footnote in the LAA. [redacted] added she was agreeable to explaining the issue in a footnote, but won't be changing the LAA Rate and the matter would revisited in a SoCG with Kent.

The Secretary noted that LAA Rates are estimates of demand for aggregates based upon average sales and adjusted for local circumstances. The problem for East Sussex is that the resource is running out, which is a supply matter and that may have to be resolved by the rest of the region taking up the strain. However, [redacted] and others queried whether that issue was being recorded.

[redacted] stated that East Sussex understand that if they don't have land won material, demand needs to be met from other sources. Soft sand is being imported from Surrey, Kent, and West Sussex mainly by road.

The Chair asked about the rail depot in East Sussex as the source of the material seems to be from Cliffe (Medway) and this might be 'double counted'. [redacted] said that this is referred to in the LAA. The Secretary added that double counting was an issue for aggregates monitoring (AM) and will have to scrutinised more fully in the future.

[redacted] asks to receive the AWP letter before Christmas.

Action 3: Secretary to write to East Sussex as soon as possible. The AWP letter would include a resume of the discussion at the meeting.

[redacted] *Actioned*

<u>Hampshire</u>

[redacted] advised SEEAWP about a 'missing site' which meant some revisions to the LAA (and AM information).

[redacted] queried the recorded wharf capacity issues in Southampton. However, [redacted] added that the capacity data is recorded to give an impression to SEEAWP about future problems rather than an exact picture. [redacted] stated that there was an issue in obtaining capacity data from operators. The Secretary added that SEEAWP is dependent on operators' views of capacity and urged their engagement on the issue.

The Chair noted that R/SA sales are reducing and queried whether the LAA rate would change. [redacted] replied that this will be looked at properly in a full review next year.

<u>Isle of Wight (IoW)</u>

The Secretary said the IoW had referred in past LAAs the issue of the chain ferry and it impact on dredger size and wharf capacity on which the Island could be increasingly dependent on.

<u>Kent</u>

[redacted] and [redacted] queried the SSG 27.7 year landbank as the method of estimation seemed contrary to guidance. [redacted] stated that he has used 2018 sales to show the point that the landbank is artificially high. The Secretary agreed that the 27-year figure is quite misleading as when using the LAA rate the landbank is 9.5 yrs.

There followed some discussion about the calculations in the Kent LAA. [redacted] agreed this would be re-examined so a consistent LAA methodology is used across the region.

NB A revised Kent LAA Dashboard is being circulated

Oxfordshire

[redacted] stated that some minor errors in Table 5 of the Annual Report and the Secretary confirmed these would be revised and requested for clarification on current planning applications. The Chair pointed out an error on the dashboard in that the crushed rock LAA Rate should be 0.778mt

Medway

The Secretary advised SEEAWP that [redacted] was unable to attend, but explained that Medway has only one active quarry with a large landbank. The Medway import facilities are very important in the region and elsewhere. The LAA rate is currently much higher than capacity when combining Medway and Kent data.

The Chair added that there are three 3 LAA rates missing.

Milton Keynes

[redacted] stated that the LAA rates for recycled aggregates and the rail depot could only be calculated on a maximum of 7-years data, however, the Secretary responded that, nevertheless this would be useful.

Surrey

The Secretary thought that the RSA figures seemed high

West Berks

The Secretary thought that rail depot capacity in West Berkshire maybe an issue as Hampshire and the rest of Berkshire are dependent on West Berkshire rail depots.

[redacted] added that this is a general problem with rail depots as there is an issue of rail freight paths on the network, particularly in the South East.

West Sussex

The Secretary said that there had been discussions between [redacted] and [redacted] on the LAA. [redacted] said that some revised wording has been suggested. He added that the LAA Rate is derived from a 10-year sales average which will be reviewed yearly and that any proposals will be judged against their merits. He agreed to add a reference to a landbank based on a 3-year average sales. The Chair queried whether Table 21 should make clear that the LAA Rates chosen were the maximum annual requirement figures.

[redacted] further added that the wording he proposed would be reflected in the Dashboard and the Summary. [redacted] agreed to circulate revised text changes

NB It was agreed that the LAAs 2020 should be considered by SEEAWP in the reverse alphabetical order.

Action 3: The Secretary to write to all mineral planning authorities about SEEAWP's views on their respective LAAs

Miscellaneous notes on LAAs 2019 – revised

Note: Includes revisions from East Sussex and Buckinghamshire, and since SEEAWP meeting those from Oxon, CEB, Hants, IoW.

Buckinghamshire

Bucks primarily produces SSG (*Note: Bucks has two producing SS quarry)* and combined S&G sales are lower that past average sales. The landbank is 10.65mt which is 13 years based on LAA Rate 10-year rolling average.
Major demand pressures acknowledged, but difficult to assess impact.
Imports SSG/SS/CR are important, but no active rail depot (*SEEAWP Annual Report notes in Planning Decisions - Appendix G – an application for a depot at Thorney Mill Rail Sidings)*
Mineral allocations used up, but replacement mineral plan adopted 2019, but not factored into LAA

Central and Eastern Berkshire *Note LAA d*oes *not cover Slough*

Sales of sand and gravel and recycled aggregate increased in 2018.
10-year average sales gave the most representative LAA rate of 0.628Mt, in the context of economic uncertainty and economic forecasting. This is a reduction from the 0.71Mt set in 2017 and will be important going forward with the Minerals and Waste Plan.
On the basis of the 2018 LAA rate, the landbank stands at 9.3years for sand and gravel.
There is likely be an increase in future aggregate demand to account for the increased level of planned future infrastructure delivery, but this is set in the context of current economic uncertainty. The 2018 LAA Rate of 0.628MT is considered a realistic estimation of demand and will be revisited yearly to establish whether Central and Eastern Berkshire Authorities are making a full contribution to the Managed Aggregate Supply System.

East Sussex, South Downs and Brighton & Hove

Small SSG resource – reserve of 0.508 mt and landbank of 1.5 years. Sales are comparable with the past. SS reserves 0.35 mt located entirely within the National Park at one site which has been inactive for at least 5 years.
Dependent on imports, some by rail, which have increased and marine/imported CR/S&G which are comparable with past average levels.

New aggregates processing and distribution facility to commence in 2020.
(*Development of Fishers Wharf, East Quay, Newhaven)*
Mineral plan under preparation

Hampshire

Sales of sand and gravel and soft sand have increased. There continues to be landbank issues, however permissions granted in 2019 will alleviate this issue for sharp sand and gravel. Landbank issues remain for soft sand.
Although still not meeting our local plan rate requirement. This will be assessed as part of the plan review to be undertaken next year.
The plan rate for sand and gravel is 1.28Mt, a range of economic growth forecasts were applied to the 2018 sales, 3 years av sales and 10 year av sales. The 2018 LAA rate is based on 2018 sales AT 0.92Mt. The same approach was used for soft sand. The LAA rate was again based on 2018 sales, which is very similar to the 3 year average - but this was 0.1MT above.
Sales of recycled and secondary aggregate have reduced for the 4th year running.
Sales of marine sand and gravel have also reduced.
It has come to light that Mortimer Quarry is now operational (commenced in 2018), so we are in the process of updating the LAA. There was an issue with the legal agreement for the site, so the resources haven't been included in the Hampshire reserves to date. The inclusion of this site improves the landbank for sand and gravel to 7.88 years for all sand and gravel (which is different to what is in the AM report). Although this doesn't improve the soft sand landbank figures.
We currently have issues getting capacity returns for Hampshire's wharves, but the information we do have indicates that they are running near capacity.
In terms of sites, Roeshot has been approved, Kingsley going to committee shortly. There are discussions underway regarding other sites which we are hopeful will come forward in the near future.

Isle of Wight

Total sales of aggregates on the Isle of Wight have shown a slight increase on previous years.
Land won and recycled aggregate have both increased
LAA rate for S&G based on 3-year average sales, which gives landbank of 8.6 years.
Plan apportionment rate was 100Tt, there is very little difference between 3 year and 10 years average sales. When looking at economic forecasts and recent sales, the 3 year sales rate appeared most appropriate and was the higher of the two.
Recycled aggregate at the highest level for 10 years
Crushed rock and marine won sand & gravel have decreased.
When measured against the IoW plan rate they do not meet their minimum requirement, however when the 2018 LAA rate is applied the minimum sand and gravel provision rate is met.
Aiming to produce a new minerals plan in the future however currently focussing on the local plan
No sites came forward in 2018 and one wharf closed in 2018, raising confidentiality issues.

Kent

Only a ‘dashboard’ submitted.
Sales in 2018 below averages except for CR rail depot sales.
LAA Rates for sand and gravel based on 10myear average provides for land banks of 17 and 28 years for SS and SSG respectively. CR data confidential. Increasin g reliance on imports and noted capacity at wharves and depots have sufficient capacity
NB Data and conclusions appear to conflict with AM tables in Annual Report

Oxfordshire

Both sharp sand and gravel and soft sand aggregates sales levels are higher than past 10 and 3-year averages. Crushed rock sales are higher than the ten year sales average but lower than the current 3 year average
The SSG LAA Rate is unchanged from previous LAA as current sales are below it – 13-years landbank
SS revised to reflect recent increase in sales and to provide for future demand – 13-year landbank
CR – also revised to reflect sales and to provide for future demand - 10-year landbank
Rail depot – mainly CR imports – data confidentiality, but capacity margin limited
Mineral plan Part 2 – will address outstanding requirements, but some sites permissions pending commencement and Annual Report indicates applications pending

Medway

Only one active quarry and with an inactive there is proportionally a large landbank. Marine aggregates and imports of rock by sea and rail (there is a query about the data for the latter) important locally and regionally. Capacity for growth *Possible data consistency issues need resolving – see Kent above.*

Milton Keynes

Limited no. of SSG sites and current sales are comparable/lower than past average sales. There is no SS but a rail depot imports SS and CR - some data confidential
LAA Rate based on 10-year sales average and there is a 5-year landbank.
Mineral plan allocates 4 quarries and support expansion of the depot sites

Surrey
All aggregates sales are above previous averages - SS landbank 18 years; SSG landbank 5.5 years based on LAA Rate close to average sales.
Only one rail depot but nos. of neighbouring mpa facilities supply Surrey
Supply of SSG can be maintained in short to medium term, but longer term will be dependent more on R/SA, imported marine (Thames wharves), SS from other mpas and CR from neighbouring rail depots.
New mineral plan to commence preparation 2020.

West Berkshire

SSG/SS sales at lowest on record. SSG reserves largely bound up in one quarry.
LAA Rate maintained from last LAA and above average sales – 14-year land bank
SS have very limited reserve < one-year land bank
Mineral plan under preparation to address a requirement of 0.9mt SSG and 0.8mt SS
Rail depot LAA Rate based on 3-year average sales – limited capacity margin.

West Sussex

Limited SSG sales low - one site plus incidental sales from SS quarries – land bank of 23 years
SS sales about 0.3mt in 2018 and above past average levels – LAA Rate based on 10-year sales average adjusted for local considerations gives landbank of 6 years
Imported aggregates through depots and wharves - LAA Rates for CR, 0.9mt and S&G 1.7mt reflect relative importance of these sources. Wharves and depots appear to have a capacity margin of +30%
Adopted mineral plan but a review of soft sand DPD underway.

Abstract from the Secretariat's notes of the SEEAWP meeting 14 November 2019

[redacted] stated that [redacted] had some corrections to the notes.

Some general issues – some authorities don't do LAA rate for certain supply options, the guidance is clear, confidentiality about certain LAA rates, average sales should not be treated as confidential therefore there is no reason why LAA rates should be.

SEE [redacted] NOTE for individual Authority information

Buckinghamshire County Council

[redacted] Corrected [redacted]'s note as it has 2 soft sand sites not 1, Sales in 2018 lower than last 2 years, based LAA rate on 10 year sales averages, landbanks healthy – 13 years, individual both above 10 yrs. Don't think R&S is representative of Buckinghamshire as there were problems with data.

The Bucks growth forecasts were steered by what was provided by the district forecasts.

[redacted] was surprised that sales are low as Berryhill Farm sales are approximately 800,000 tonnes, [redacted] stated that the Hertfordshire side has been extracting more than Bucks side. Has been included.

[redacted] queried why on the SSG side they aren't published. [redacted] all figures are based on combined S&G figures. [redacted] suggested that a footnote be added to the table.

[redacted] added that the Buckinghamshire plan has now been adopted in Bucks.

[redacted] because the LAA has been based on 2018 data, the last LAA for Buckinghamshire County Council.

[redacted] stated that Bucks is becoming a unitary authority in April, understand data is in 2018. [redacted] replied that it is referenced that in the exec summary.

[redacted] stated that there isn't an LAA rate for R&S aggregate and this should be added.

JCEB

[redacted] informed the AWP how the JCEB LAA rate was calculated.

[redacted] took 2018, 3 yr avg, 10 yr avg sales of aggregate streams and applied growth rates over the plan periods and then compared them to population, housing and infrastructure demands.

For S&G 10yr average sales gave the most representative figure of 0.628, on this basis it provides a landbank of over 9 yrs.

R&S LAA rate needs to be transposed from the text to the Dashboard.

[redacted] asked about soft sand resources, [redacted] replied that a soft sand study was commissioned and couldn't find an adequate resource within Central and Eastern Berkshire.

East Sussex

Soft Sand LAA rate is 0, all other rates based on 3 year average as due to data issues East Sussex cannot do a 10 year average.

SS&G LAA Rate is calculated by halving the 3 year average as 50% of material goes to Kent.

[redacted] asked about the logic of halving the rates.

[redacted] stated that historically when working out the landbank it has been divided by 2, and they feel that it's a fair representation of what is happening.

[redacted] added that he doesn't recall Kent adjusting their figures.

[redacted] has started a review and hope for regulation 18 in early next year, a rough estimate shows that they may need to double the rate that aggregate is supplied.

[redacted] queried the table 5 annual report, he has noticed quite a few errors in AM report, [redacted] responded that she has noted these errors.

[redacted] is still confused about 50% reduction, East Sussex is not the only authority which transports material across boundaries.

[redacted] stated that it is a particular situation because it has been split historically between here in East Sussex and Kent.

[redacted] stated that there is not 3 years left at Lydd quarry.

[redacted] stated that there needs to be a reconciling or footnote about this cross boundary figures.

[redacted] can put a footnote as to why they consider the LAA rate to be 0.16Mt.

[redacted] added this is effectively lost tonnage as it is not picked up in Kent.

[redacted] replied that as it's an LAA rate, the tonnage itself is not in itself lost.

[redacted] added that in the sales that is recorded it is just the LAA rate that changes.

[redacted] stated that the LAA rate exist for many reasons, what are the consequences of having the LAA rate halved.

[redacted] added that East Sussex doesn't need to provide for the half that goes to Kent.

[redacted] stated that the tonnage is not being replenished, and therefore tonnage is being lost.

[redacted] is happy to be putting this issue in a footnote but won't be changing the LAA rate, and will be drawing up a SOCG with Kent.

[redacted] stated that there is concern about the choice of the LAA rate and this should be taken on board, LAA Rate is meant to be an aggregate demand rate, based upon sales and adjusted for local provisions, the problem that East Sussex has is that its running out, the region needs to take up the strain.

[redacted] questioned whether the issue was that the strain is not being recorded.

[redacted] added that if the LAA rate is the demand figure then next year the East Sussex demand will be 0

[redacted] stated that its not really an assessment on demand but an estimate on sales.

[redacted] asked wouldn't it be easier to establish the demand In the county and then find how they'd address it.

[redacted] added its just 1 S&G quarry on the boundary with Kent, how is the best way for the demand will be met by new provision.

[redacted] stated that East Sussex understand that if they don't have land won material there would need to be other sources. They know sand is coming from Surrey, Kent, and West Sussex. We have to assume that the sand is all being imported by road as there is nothing coming via other routes.

[redacted] asks to receive the AWP letter before Christmas.

[redacted] asked about the rail head at East Sussex as the source of the sand is from Cliffe, if its already counted in Medway should it be counted in East Sussex? [redacted] has put info about this in the LAA. [redacted] stated there is a likely issue about double counting.

<u>Hampshire</u>

[redacted] informed the AWP about the missing site and that this was the result of a delay in the granting of a S106.

[redacted] agreed with this seeing as it did not have a S106 it couldn't previously be counted as reserves.

[redacted] surprised about the Wharf capacity issues existing with Southampton.

[redacted] added that the whole indicator of capacity is to establish whether we have enough wharf capacity.

[redacted] stated that there was an issue in getting capacity data from the operators.

[redacted] added that we aren't getting an operator view on capacity and are dependent on the operator.

[redacted] mentioned that this is the 4th reduction of R&S aggregate and what point it should change the LAA rate.

[redacted] replied that this will be looked at properly in a full review next year.

<u>IOW</u>

[redacted] stated [redacted] has mentioned in the past the issue of the chain ferry and this affecting wharf capacity.

<u>Kent</u>

[redacted] and [redacted] asked about the SS&G 27.7 year landbank as this is contrary to guidance.

[redacted] stated that he has used 2018 sales to show the point that the landbank is artificially high

[redacted] agreed that the 27-year figure is quite misleading as when using the LAA rate the landbank is 9.5 yrs.

[redacted] responded that they can use the LAA rate for in the LAA.

[redacted] requests that the Landbank is addressed to the LAA Rate.

[redacted] stated that the LAA rate for crushed rock is half the 10yr average. We have a very low Crushed Rock LAA rate for Kent.

[redacted] stated that as the figures are for Crushed Rock the LAA rate is Confidential and it therefore can't be shown.

[redacted] stated that he did not have sales figures from these sites.

[redacted] stated that he did not feel that table 5 (AM Report) reflected what's going on.

[redacted] that those figures were supplied by LAA rates and were estimated in this case.

[redacted] clarified that the data in the LAA was not submitted through the EIP.

[redacted] stated that it was not.

[redacted] urges comments made here are taken on board for the LAA.

<u>Oxfordshire</u>

[redacted] stated that some of the figures in AM report Table 5 are slightly wrong.

[redacted] asked what applications Oxfordshire had currently. [redacted] responded that there were 3 in the pipeline and 1 was refused.

<u>Medway</u>

[redacted] stated that they only have 1 active quarry, large landbank, importance is the Wharves and Rail depots there may be some double counting with Kent. The LAA rate is currently much higher than capacity when combining Medway and Kent.

[redacted] believes that the sales are separate, [redacted] flagged up the possible issue.

[redacted] added that there are 3 LAA rates missing from the LAA.

<u>Milton Keynes</u>

[redacted] Stated that the LAA rate could only be done on a maximum of 7 years worth of data. [redacted] responded that this would be useful if possible.

<u>Surrey</u>

See Notes.

[redacted] stated that the Recycled and Secondary Aggregates figures seemed high

West Berks

[redacted] stated that rail depot capacity is an issue as Hants and Rest of Berks are dependent on West Berkshire rail depots.

[redacted] added that this is a general problem with Rail depots, he has recently attended a meeting with network rail and there is problems with rail capacity for freight cars, this is a national issue which is worst in South East.

[redacted] added that lots of rail companies were having issues with train drivers being found.

West Sussex

[redacted] stated that he felt the LAA Rate was misrepresentative.

[redacted] informed the AWP that he had produced some proposed wording on this. He added that the LAA rate has come from 10 year average which will be reviewed yearly and that proposals will be judged against their merits.

[redacted] is happy to add reference to the landbank on the 3 year average in the LAA.

[redacted] added that they understood its challenging to be consistent for the LAA rate

[redacted] stated the wording he has used will be reflected in the Dashboard and the Summary.