

West Berkshire Minerals and Waste Local Plan Examination Hearings

Position Statement for West Berkshire Council

Matter 2 – Construction Aggregates Requirements (Policy 2)

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Issue 1 – Approach to definition of numerical aggregate requirements

a. Is the separate consideration of soft sand, sharp sand and gravel requirements and secondary aggregate contributions appropriate and internally consistent, taking account of variations in nature and quality within aggregate deposits?

- 2.1.1 The NPPF, at paragraph 213(h), requires mineral planning authorities to plan for a steady and adequate supply of aggregates by (inter alia) calculating and maintaining separate landbanks for minerals which have a distinct and separate market.
- 2.1.2 The Council considers that there are separate markets for concreting sand (used in the production of concreting applications) and building sand (used in the production of mortars and plasters) [CD001, para 4.19]. This point has not been contested by representations to the MWLP.
- 2.1.3 In West Berkshire, bedrock resources generally comprise ‘soft sand’, which is better suited to the production of building sand for mortars etc, in comparison with ‘sharp sand’ [SI005, pp. 4-5].
- 2.1.4 Sharp sands tend to have more angular grains, making them more suitable for use in concreting applications. In West Berkshire, ‘sharp sands’ are predominantly found within superficial river terrace deposits. Although sharp sands can also be utilised in at least some factory produced mortars, this is likely to require the use of additional cement and other additives to achieve the same level of consistency, cohesion and workability [SI005, pp. 4-5].
- 2.1.5 It is understood that the sharp sand resources available for allocation in West Berkshire do not have the characteristics that are suitable for use as building sand [SI005, page 7]. Given that using a combined landbank would not allow for the separate provision of local soft sand supplies, this would place reliance on imports of suitable building sand or mortar products, contrary to the NPPF requirement to aim to source mineral supplies indigenously (paragraph 210(b)).
- 2.1.6 Therefore, it is considered that separately identifying landbanks for sharp sand and soft sand in West Berkshire is justified and consistent with the NPPF.

- 2.1.7 Separately identifying the contribution of recycled and secondary aggregates in MWLP Policy 2 is considered necessary in order to understand the level of contribution they are making to the overall aggregate supply. This is consistent with the NPPF requirement to take account of the contribution of recycled and secondary materials before considering extraction of primary materials (paragraph 210(b)).
- b. Is the interrelationship of the secondary and recycled aggregate contribution and the primary aggregate contributions to the total requirement effectively defined and able to be monitored to avoid unnecessary use of primary sources?*
- 2.1.8 The level of contribution of recycled and secondary aggregates has been determined by the Local Aggregates Assessment (LAA) [ME001, p. 36-37] and is based on the past 3-year sales average; consistent with minerals planning guidance (Paragraph: 064 Reference ID: 27-064-20140306).
- 2.1.9 Policy 2 of the MWLP [CD001, page 16] reflects the NPPF requirement in paragraph 210(b) and requires that the need for construction aggregates should be met, where possible, from recycled and secondary sources in preference to primary aggregates. Sales of recycled and secondary aggregates have been separately recorded in West Berkshire since 2012 (LAA, figure 4.1) [ME001, page 18]. Therefore, their contribution to overall aggregate supplies is able to be determined. This has shown that recycled aggregates consistently supply approximately 23 – 28% of total aggregate sales in West Berkshire (LAA, figure 6.2) [ME001, page 25].
- 2.1.10 The demand for primary aggregates and recycled and secondary aggregates are reflected in their relative contributions to total aggregate supply. Where it is more economic or practical to use recycled and secondary aggregate in preference to primary materials, the market will decide this. Therefore, it is considered that using an average of the recent (3-year) contribution of recycled and secondary aggregates supply to the market is an appropriate basis on which to plan for them over the Plan period [ME001, pp. 36-37].
- 2.1.11 The Council has little control over the actual sales of recycled and secondary aggregates, as this is dictated by the market. However, the Council can ensure that there is sufficient capacity to enable the required level of sales, and this is what MWLP Policy 2 requires. It is considered that providing for capacity to enable recycled and secondary aggregates to meet the anticipated level of provision will enable these aggregates to be used in preference to primary aggregates, where it is practical and possible. This level of supply, as well as sales of recycled and secondary aggregates can be easily monitored to determine if the level of provision continues to remain appropriate over the Plan period. This approach is set out in paragraph 4.10 of the MWLP [CD001, page 16].
- c. Should there be specific reference to 4-yearly Aggregate Monitoring Surveys to inform the LAA?*

- 2.1.12 The most recent of the 4-yearly Aggregate Mineral surveys was undertaken by the BGS on behalf of (former) MHCLG in 2019. A Main Modification has been agreed with Oxfordshire County Council to address their concerns and make reference to the most recent of these surveys that will inform future LAAs (MM6).

MM6 (New paragraph after 4.13): 'MHCLG have undertaken the Aggregate Minerals Survey for 2019, which along with sales, reserves and permissions, also includes movements of minerals between Mineral Planning Authorities. Once published, the results of this survey, particularly in relation to movements of aggregate minerals into West Berkshire, will be critical to determining West Berkshire's future projections of need for aggregate minerals. The findings of this survey and any other relevant future surveys will be considered within future LAAs.'

Issue 2 – Soft Sand Requirement

Is the Soft Sand primary requirement of 790,000 tonnes appropriate and based on robust evidence including the most recent annual Local Aggregates Assessment (LAA) [ME001] and the Soft Sand Study [ME003] and having regard to past sales data, current demand and building methods and the national requirement to maintain a minimum 7-year landbank?

- 2.2.1 The requirement for 790,000 tonnes of soft sand has been determined in the LAA [ME001], based on an annual requirement of 43,730 tonnes per annum (tpa) over the Plan period (Table 8.5) [ME001, page 43].
- 2.2.2 The LAA rate of 43,730 tpa has been determined on the basis of the past 10 years' sales average for the period 2008 – 2017. The reasoning for this is set out in the LAA at section 7.3 [ME001, pp. 35-36]. The NPPF, at paragraph 213(a), requires that mineral planning authorities plan for a steady and adequate supply of aggregates by preparing an LAA, based on a rolling average of 10 years' sales data, **and other relevant local information**.
- 2.2.3 In the 2020 LAA, it was considered that relying solely on the past 10 years' sales data at that point may not meet the requirement to plan for a steady and adequate supply of aggregates due to the fact that there has been a significant decline in aggregate producing sites together with declining reserves in operational sites in West Berkshire, in recent years. Therefore levels of sales have been suppressed and may not reflect the true demand for aggregate minerals in the district (LAA section 7.3) [ME001, pp. 35-36]. Consequently, the 2018 LAA Rate of 43,730 tpa was recommended to be rolled forward, as this was the most recent LAA rate considered sufficient to meet demand for aggregates in West Berkshire (para 7.3.9 [ME001, page 36]). This approach is set out in MWLP para 4.15 [CD001, page 17].
- 2.2.4 LAAs are subject to the scrutiny of the relevant aggregates working party (in this case the South East England Aggregate Working Party (SEEAWP)). The LAA has been consulted upon with SEEAWP and surrounding Local

Authorities, as well as authorities with specific movements of aggregates to and from West Berkshire. No issues of concern were raised in relation to the proposed LAA rates (LAA, section 10) [ME001, page 48].

- 2.2.5 Some representations have considered that the level of provision for soft sand (if required) is excessive and unjustified. However, in recent years, as noted in the Soft Sand Study [ME003], an increasing part of the demand for soft sand has been met, at least in part, by imports of similar sand from neighbouring parts of South Oxfordshire (para 3.4) [ME003, page 11]. The demand has not gone away simply because local production capacity has declined; it has been met by imported material, placing an additional burden on the neighbouring Mineral Planning Authority [SI005, page 8]. It follows that, in the absence of other evidence, it is reasonable and appropriate to plan for future soft sand provision in West Berkshire based on historical sales figures. To do otherwise could risk leading to under-provision locally, and placing increased reliance on imported material and associated transportation impacts, including carbon emissions. WBDC's stance in seeking to maintain its historical share of production, rather than relying on imports, is similar to the approach adopted by Oxfordshire County Council in producing its own Local Aggregate Assessment in 2014 as the basis for its Core Strategy DPD, in the face of strong pressure to reduce its level of provision following a period of falling sales and production capacity (which has subsequently increased). That approach was found to be sound [SI005, page 8].
- 2.2.6 Representations have also made reference to the fact that building methods have changed to reduce dependence on and thus demand for mortar products, including through reducing internal brickwork and increased use of concrete blocks instead of bricks. However, these changes happened many decades ago, and recent sales figures (as used in the LAA) will reflect only modern practices [SI005, page 6].
- 2.2.7 With regards to the NPPF requirement to maintain a minimum 7-year landbank (para 213(f)), it is considered that the MWLP includes flexibility to allow unallocated sites to come forward to maintain landbanks (Policy 4) [CD001, page 22]. The MWLP would also be required to be reviewed every 5 years, therefore if the landbank falls below the 7 year requirement this will be addressed in a review of the Plan and well before the end of the Plan period.

Issue 3 – Sharp Sand and Gravel Requirement

Is the Sharp Sand and Gravel primary requirement of 840,000 tonnes appropriate and based on robust evidence including the most recent annual Local Aggregates Assessment (LAA) [ME001] and having regard to past sales data, current demand and building methods and the national requirement to maintain a minimum 7-year landbank?

- 2.3.1 Much of the justification for the level of provision of sharp sand and gravel is the same as for soft sand, as the same reasoning has been used to determine both LAA rates.
- 2.3.2 The requirement for 840,000 tonnes of sharp sand and gravel has been determined in the LAA, based on a requirement of 189,233 tpa over the Plan period (LAA Table 8.5) [ME001, page 43].
- 2.3.3 The 2020 LAA Rate for sharp sand and gravel, as for soft sand, has been based on the 2018 LAA Rate (189,233 tpa) for the same reason, in that this is the most recent LAA rate considered sufficient to meet demand for these aggregates in West Berkshire (para 7.3.9) [ME001, page 36]. This approach is set out in MWLP para 4.15 [CD001, page 17].
- 2.3.4 As for soft sand, it was considered that relying solely on the past 10 years' sales data for sharp sand and gravel may not meet the requirement to plan for a steady and adequate supply of aggregates due to the fact that there has been a significant decline in aggregate producing sites together with declining reserves in operational sites in West Berkshire, in recent years. Therefore levels of sales have been suppressed and do not likely reflect the true demand for this aggregate mineral in the district (LAA section 7.3) [ME001, pp. 35-36].
- 2.3.5 With regards to the NPPF requirement to maintain a minimum 7-year landbank (para 213(f)), it is considered that the MWLP includes flexibility to allow unallocated sites to come forward to maintain landbanks (MWLP Policy 4) [CD001, page 22]. The MWLP would also be required to be reviewed every 5 years, therefore if the landbank falls below the 7 year requirement this will be addressed in a review of the Plan and well before the end of the Plan period.