

West Sussex Joint Minerals Local Plan

Duty to Cooperate Statement

May 2017



Working in Partnership



Executive Summary

This statement explains how West Sussex County Council and South Downs National Park Authority have met the statutory requirements required by the Localism Act 2011 in relation to the Duty to Cooperate during the preparation of the Joint Minerals Local Plan. The statement sets out the discussions that have taken place with the relevant bodies that are prescribed in the Act. The audit trail and the outcomes of the discussions are structured in this report according to the strategic issues that have been addressed through the preparation of the plan. The strategic issues are:

- Maintaining an adequate supply of soft sand;
- Maintaining an adequate supply of sharp sand and gravel;
- Maintaining an adequate supply of silica sand;
- Maintaining an adequate supply of crushed rock;
- Maintaining an adequate supply of clay;
- Maintaining an adequate supply of marine dredged aggregates;
- Safeguarding Mineral Resources and Infrastructure (e.g. coated roadstone plants, asphalt plants, oil sites, railheads and recycled aggregate sites);
- Safeguarding wharves in Shoreham Harbour;
- Safeguarding Railway Wharf at Littlehampton Harbour
- Identifying potential minerals sites.

The statement shows that there has been ongoing and effective cooperation throughout the preparation of the Joint Minerals Local Plan. The outcomes of the discussions that have taken place are summarised and details are set out for ensuring that there is ongoing cooperation and monitoring of the strategic issues.

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1.0. Introduction

- 1.0.1. This statement has been prepared jointly by West Sussex County Council and the South Downs National Park Authority ('the Authorities') as part of the evidence for the Proposed Submission Draft Joint Minerals Local Plan (JMLP) which has been submitted to the Secretary of State for independent Examination. The statement demonstrates how the Authorities have met the statutory requirements required by the Localism Act 2011 in relation to the Duty to Cooperate (DtC) for the preparation of the JMLP. The DtC is separate from, but related to, the Local Plan tests of soundness and legal compliance. The national legislation and planning policy context for the DtC is explained in section 1.1.
- 1.0.2. This statement sets out how the Authorities have engaged in ongoing and effective dialogue with neighbouring authorities, district/borough councils and other prescribed bodies, as set out in Appendix B on the strategic matters affecting the plan area. It is a record of the discussions that have taken place with the bodies prescribed in Section 33A of the Localism Act only. For details of the engagement and consultation that has occurred with all stakeholders during the preparation of the JMLP, please refer to the consultation summaries (www.westsussex.gov.uk.mwdf)
- 1.0.3. The statement is structured according to the strategic issues that have been considered during the plan preparation. The strategic issues are summarised in Table 1 and evidence of the Authorities' co-operation with the relevant bodies includes:
- **Early engagement and consultation outcomes** – summary of outcomes from early engagement, Regulation 18 and Regulation 19 consultation;
 - **Co-operation with other Minerals Planning Authorities** – neighbouring mineral planning authorities, mineral planning authorities in the south east and other mineral planning authorities further afield;
 - **Cooperation with 'other prescribed bodies'**- as listed in Appendix C;
 - **Cooperation with District and Borough Councils in West Sussex.**

1.1. **Policy Context**

National Legislation

Localism Act 2011/Planning and Compulsory Purchase Act

1.1.1. The 'Duty to Cooperate' (DtC) is set out in Section 33A of the Planning and Compulsory Purchase Act 2004 (local development) as amended by the Localism Act 2011. This requires authorities to have on-going and constructive engagement with other bodies in relation to planning of strategic cross boundary matters. Local planning authorities are also required to consider whether to consult on, or prepare joint approaches or local development documents.

1.1.2. Section 33A of the Localism Act defines a 'strategic matter' as:

"Sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas, and

(b) sustainable development or use of land in a two-tier area if the development or use

(i) is a county matter, or

(ii) has or would have a significant impact on a county matter".

1.1.3. The provision of minerals is specifically listed as a strategic priority in paragraph 156 of the NPPF (March, 2012).

Town and Country Planning (Local Planning) (England) Regulations 2012

1.1.4. Part 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) specifies the bodies that are prescribed for the purposes of the DtC provisions of the Act. The DtC applies to all county councils and local planning authorities in England as well as a number of other bodies which are set out in Appendix C.

National Planning Policy Framework

1.1.5. Paragraph 178 of the NPPF states that public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to strategic priorities which includes provision of minerals (NPPF para 156). The Government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities.

- 1.1.6. Local planning authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in individual Local Plans. Joint working should enable local planning authorities to work together to meet development requirements which cannot be met within their own areas (para. 181 of NPPF, 2012).
- 1.1.7. Paragraph 181 sets out the requirement for local planning authorities to demonstrate evidence of having effectively cooperated to plan for issues with cross boundary impacts when their local plans are submitted for examination and this document is intended to be the main source of this evidence for the JMLP.

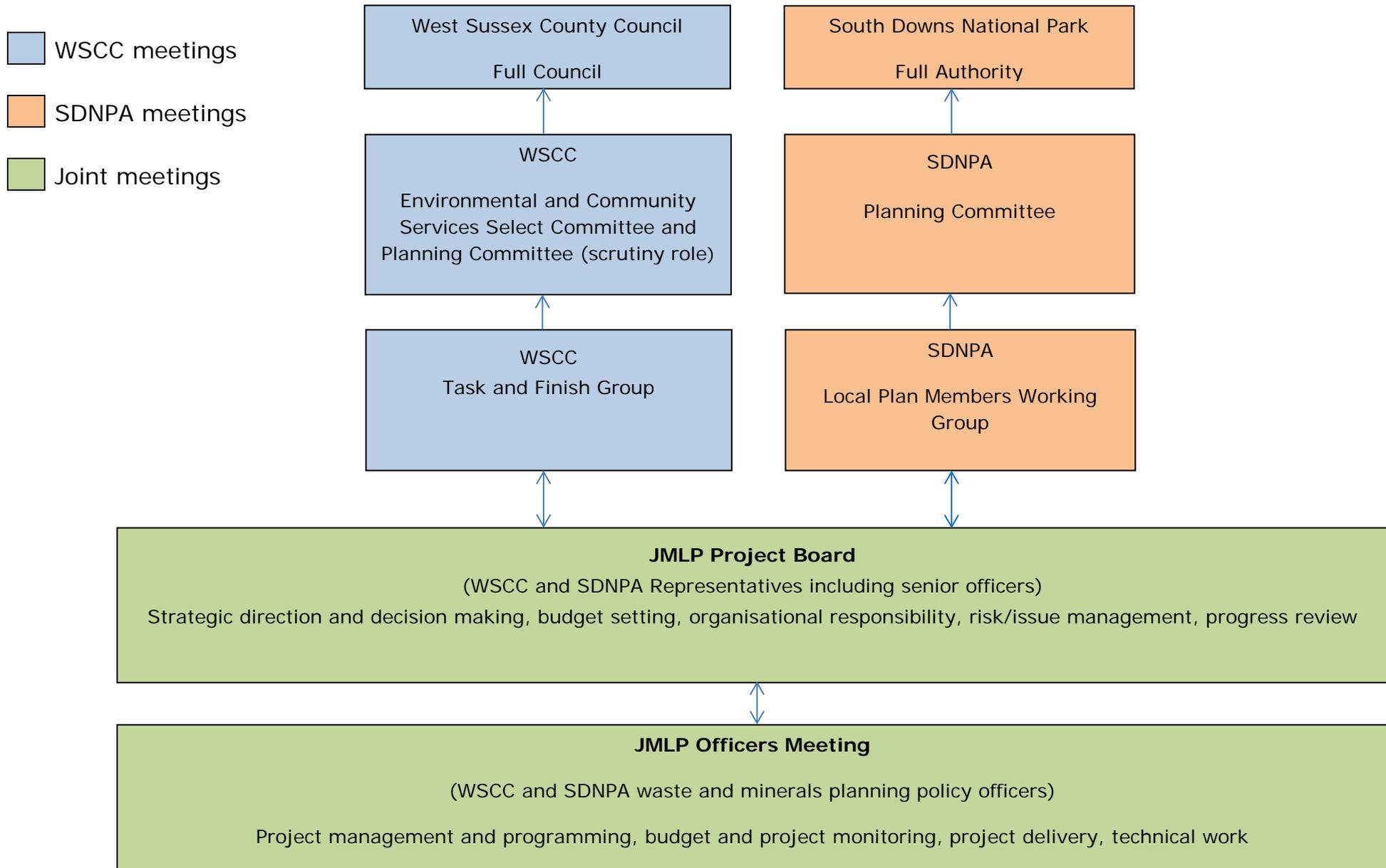
National Practice Guidance

- 1.1.8. The National Planning Practice Guidance (NPPG) provides further guidance on how to meet the requirements of the DtC. It states that the DtC is not a 'duty to agree' but local planning authorities should make every effort to secure the necessary cooperation on strategic cross boundary matters. Cooperation should take place throughout the local plan preparation and should produce effective policies on cross boundary strategic matters. The NPPG highlights that close cooperation in two tier planning authorities' areas is critical to ensure effective planning of strategic matters such as minerals, waste, transport and education.

2.0. Strategic Context

- 2.1. West Sussex is situated in the South East region. It covers 1,990 square kilometres (199,000 hectares) with more than half of the county protected by national landscape designations including the South Downs National Park (SDNP), the High Weald Area of Outstanding Natural Beauty (AONB) and Chichester Harbour AONB. The strategic planning area is shown in Map A1, Appendix A.
- 2.2. The distribution of minerals across the country is not even and as a result, neighbouring authorities may have a reliance on the minerals available in West Sussex, just as West Sussex may rely on other areas to supply minerals which do not occur in the county, such as crushed rock. Materials are imported through wharves (to the ports of Shoreham and Littlehampton) and railheads (in Crawley, Ardingly and Chichester). Some neighbouring authorities are also reliant on materials imported to wharves and railheads in West Sussex (Map A2, Appendix 1).
- 2.3. Since the designation of the South Downs National Park, West Sussex County Council and the South Downs National Park Authority have worked together on minerals and waste planning matters. Cooperation on these strategic matters ensures that a consistent approach to land-use planning is taken across the county.
- 2.4. The authorities work together according to a corporate decision-making structure which is summarised in Figure 1.

Figure 1: Joint Minerals Local Plan Governance and Project Structure



County Councils

- 2.5. As explained above, the distribution of minerals across the country is not even. Discussions as part of the duty to cooperate have sought to understand whether the supply of aggregates (sharp sand and gravel, soft sand, and crushed rock) from outside of the county can continue over the plan period.
- 2.6. In particular, the Authorities have been exploring the possibility of alternative sources of supply of soft sand outside of the county if demand cannot be met from sites in West Sussex. A list of the County Councils that have been engaged with as part of this process are listed in Appendix C and a record of the dialogue that has taken place is included in Appendix B. The need for careful coordination between mineral planning authorities in the south east concerning the supply of soft sand has been recognised and a Statement of Common Ground specifically relating to this matter is currently being prepared.
- 2.7. The South Downs National Park Authority (SDNPA) is responsible for all planning issues for the South Downs National Park area. Neighbouring authorities that are responsible for minerals and waste planning in their areas are:
- Surrey County Council;
 - Hampshire County Council;
 - East Sussex County Council;
 - Brighton and Hove Council.
- 2.8. The Authorities regularly attend meetings with the South East Minerals Planning Authorities. The Authorities are also members of the South East England Aggregate Working Party (SEEAWP) which is a technical advisory group charged with coordinating the supply of aggregate minerals within the south east. SEEAWP meetings occur approximately twice a year and are attended by Mineral Planning Authorities in the South East as well as industry representatives and the Marine Management Organisation. Members currently include:
- East Sussex County Council;
 - West Sussex County Council;
 - Brighton and Hove City Council;
 - Kent County Council;
 - Hampshire County Council;
 - Isle of Wight Council;
 - Surrey County Council;
 - West Berkshire County Council;
 - Oxfordshire County Council;
 - Buckinghamshire County Council;
 - South Downs National Park Authority;

- Milton Keynes Council;
- Medway Council;
- Royal Borough of Windsor and Maidenhead Council;
- Reading Borough Council;
- Slough Borough Council;
- Wokingham Borough Council;
- East Berkshire Unitaries;
- Bracknell Forest Borough Council;
- Tarmac;
- Hanson;
- Grundon;
- Cemex;
- Brett Group;
- Summerlease;
- Minerals Products Association;
- British Marine Aggregate Producers Association;
- RBMR Construction Co. Ltd.;
- Port of London Authority;
- Department of Communities and Local Government;
- The Crown Estate;
- South West Aggregate Working Party;
- East of England Aggregate Working Party.

2.9. Draft versions of the West Sussex Local Aggregate Assessment (LAA) are circulated to SEEAWP on an annual basis. The most recent Local Aggregate Assessment (January, 2017) was discussed at the SEEAWP meeting on 21st November 2016 and feedback was provided by SEEAWP members (see Appendix B). Formal approval of the latest LAA was received in an email from the Secretariat on 19 December 2016. References to SEEAWP discussions relating to particular strategic issues affecting the JMLP are included in Appendix B.

2.10. The Authorities have also been having ongoing discussions with authorities beyond the South East (listed in Appendix C) on matters relating to the supply of silica sand, soft sand and crushed rock and details of these discussions are set out in Appendix B.

Local Planning Authorities

2.11. There are seven District and Borough Councils within West Sussex which are responsible for preparing plans for the non-minerals planning issues for the parts of the county outside the South Downs National Park:

- Arun District Council;
- Adur District Council;
- Chichester District Council;

- Crawley Borough Council;
- Horsham District Council;
- Mid Sussex District Council;
- Worthing Borough Council.

2.12. The Authorities have engaged with local planning authorities within West Sussex on matters relating to mineral resource and infrastructure safeguarding and in assessment of mineral sites.

2.13. WSCC are one of the partners involved in the preparation of the Shoreham Harbour Joint Area Action Plan (JAAP). Shoreham Harbour has been identified as a broad location for change by local planning authorities and the partners have worked towards a common approach to the safeguarding of wharves in the harbour with all partners participating in the preparation of the evidence base (the Wharves and Railheads Study, 2014) and the preparation of a Statement of Common Ground between the Shoreham Harbour Planning Authorities and Shoreham Port Authority (August, 2016). The safeguarding of minerals infrastructure, including wharves, plays an important role in the supply of minerals to West Sussex. Much of the demand for sharp sand and gravel is met by landings of marine dredged aggregates at Shoreham Port and the JMLP strategy is to safeguard these facilities to ensure that the capacity for the importation of minerals through the ports is maintained. More information on the evidence base that underpins the strategy for safeguarding wharves is set out in Background Paper 4: Safeguarding Minerals Infrastructure (December, 2014) and the West Sussex Joint Minerals Local Plan: Proposed Submission Draft (Regulation 19) Background Document (January, 2017) which can be viewed online (www.westsussex.gov.uk/mwdf).

2.14. Full details of how the Authorities have collaborated with other local planning authorities on the strategic priorities identified in the JMLP is provided in Appendix B.

Other Prescribed Bodies

2.15. Part 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012 lists 'other prescribed bodies' that fall within the scope of DtC. The Authorities have engaged with 'other prescribed bodies' in relation to a number of strategic priorities including, mineral sites and mineral supply. These bodies have also been consulted at each stage of the consultation process on the JMLP (early engagement, Regulation 18 and Regulation 19). The following prescribed bodies have been involved in the preparation of the JMLP:

- Environment Agency;
- Natural England;
- The Historic Buildings and Monuments Commission known as Historic England;

- Highways England;
- Local Economic Partnership (Coast to Capital);
- Local Nature Partnership;
- Marine Management Organisation.

Coast to Capital Local Economic Partnership

- 2.16. Local planning authorities are required to cooperate with the Local Economic Partnership (LEP) and have regard to their activities when preparing local plans. In West Sussex, the 'Coast to Capital' (LEP) covers Brighton and Hove in the South to Croydon in the north and embraces the Gatwick Diamond, Coastal West Sussex, and Rural West Sussex 'economic regions'.
- 2.17. In July 2016, an email was sent to the LEP providing an update on the JMLP and explaining how the JMLP will make an essential contribution to the focus of the LEP and inviting them to comment. Although no written response was received, the plan preparation takes into account the implications of the LEP's Strategic Economic Plan. The LEP are also consulted on the Local Aggregate Assessment (LAA) when they are published on an annual basis.

Sussex Local Nature Partnership

- 2.18. The Sussex Local Nature Partnership (LNP) was formally established in 2012. The LNP has two high level objectives which are to:
- Conserve, enhance and expand Sussex's Natural Capital;
 - Ensure that Sussex residents share in the benefits provided by healthy, well-functioning ecosystems.
- 2.19. The Sussex LNP have produced a Local Plan Guidance document which sets out a number of questions to be addressed in Local Plans which has been considered through the preparation of the JMLP. The Sussex LNP were also consulted during the preparation of the JMLP and no comments were received. Following this, the Local Nature Partnership were contacted directly to check whether they had any views on the JMLP and inviting them to a meeting to discuss any issues. No response was received. Following the Proposed Submission Draft JMLP period of repetitions (Regulation 19), the Authorities met with the Sussex Wildlife Trust to discuss their response to the 'West Sussex Joint Minerals Local Plan Proposed Submission Draft, Regulation 19 (January, 2017)'. Although their response was not on behalf of the LNP, the Sussex Wildlife Trust sit on the LNP Executive Committee and commented that the Local Nature Partnership: Local Plan Guidance should be the point of reference for the JMLP in terms of addressing the Duty to Cooperate.

Marine Management Organisation

- 2.20. The Marine Management Organisation is responsible for producing marine plans and has jurisdiction for the South Inshore and South Offshore Plans. They are responsible for issuing marine licences, which are required for offshore aggregate dredging. The Marine Management Organisation were consulted during the preparation of the Plan and no comments were received. The MMO were contacted directly in November 2016 and a standard acknowledgement was received explaining their role and a number of documents that should be referred to in Mineral Plans and Local Aggregates Assessments. Reference to these documents has been included in the JMLP and the Local Aggregate Assessment (2017). See Appendix B.
- 2.21. Details of engagement with these bodies and any replies received is included in Appendix B.

3.0. Strategic Priorities

- 3.1. This statement is structured according to the strategic issues that have been addressed through the preparation of the plan. Table 1 summarises the relevant strategic priorities and detailed information and evidence about each issue is given in Appendix B and C.

Table 1: Summary of DtC action and evidence for the JMLP

Strategic Priority	Summary of Actions	Evidence	Summary of Outcome	Summary of Ongoing Cooperation
<p>Maintaining an adequate supply of soft sand</p>	<ul style="list-style-type: none"> • Targeted engagement on Background Papers, supply options and a draft JMLP; • South East MPA meetings; • SEEAWP meetings; • LAA consultation; • DtC letter to other MPAs with soft sand resources; • West Sussex JMLP Regulation 18 consultation; • Soft sand Statement of Common Ground; • West Sussex JMLP Regulation 19 consultation. 	<ul style="list-style-type: none"> • Summary of engagement on Background Papers - workshop outcomes; • Minutes from SEEAWP meetings; • Minutes from South East MPA meetings; • Summary of responses to LAA; • Summary of comments received from targeted letter to authorities; • West Sussex Minerals Joint Local Plan –Have Your Say on the Draft Joint Minerals Local Plan Consultation 2016: Outcomes Report (January, 2017); • West Sussex Joint Minerals Local Plan: Submission - Statement of Consultation: Regulation 22 (May, 2017); • Soft sand Statement of Common Ground. 	<p>The Proposed Submission JMLP includes policy M10 (Strategic Mineral Site Allocations) which allocates one soft sand sites that lies outside the South Downs National Park (Ham Farm) with an estimated yield of 725,000 tonnes. Discussions through DtC have shown that, there are sufficient reserves of soft sand outside the SDNP and that means exceptional circumstances required to allocate sites within the SDNP do not exist. The South East MPAs have agreed to the preparation of a Statement of Common Ground (SoCG) to explain the issues with soft sand supply in the South East. The SoCG is in the process of being signed off by each authority.</p>	<ul style="list-style-type: none"> • Annual Monitoring Report • Local Aggregate Assessment • Attendance at the SEEAWP meetings • Ongoing South East MPA Meetings.

<p>Maintaining an adequate supply of sharp sand and gravel</p>	<ul style="list-style-type: none"> • Targeted engagement on Background Papers, supply options and a draft JMLP; • South East MPA meetings; • SEEAWP meetings; • LAA consultation; • West Sussex Minerals Joint Local Plan –Have Your Say on the Draft Joint Minerals Local Plan Consultation 2016: Outcomes Report; • West Sussex Joint Minerals Local Plan: Submission - Statement of Consultation (Regulation 22). 	<ul style="list-style-type: none"> • Summary of engagement on Background Papers - workshop outcomes • Minutes from South East MPA meetings; • Minutes from SEEAWP meetings; • Summary of responses to LAA; • West Sussex Minerals Joint Local Plan –Have Your Say on the Draft Joint Minerals Local Plan Consultation 2016: Outcomes Report (January, 2017); • West Sussex Joint Minerals Local Plan: Submission - Statement of Consultation: Regulation 22 (May, 2017). 	<p>The evidence shows that there is adequate provision for sharp sand and gravel to meet demand over the plan period. This has not been disputed by the Strategic Partners through DtC discussions.</p>	<ul style="list-style-type: none"> • Annual Monitoring Report • Local Aggregate Assessment • Attendance at the SEEAWP meetings • Ongoing South East MPA meetings.
<p>Maintaining an adequate supply of silica sand</p>	<ul style="list-style-type: none"> • Targeted engagement on Background Papers, supply options and a draft JMLP; • Letter to other MPA with silica sand resources; West Sussex JMLP Regulation 18 consultation; • West Sussex JMLP Regulation 19 consultation. 	<ul style="list-style-type: none"> • Summary of engagement on Background Papers - workshop outcomes • Summary of comments from targeted DtC letter • Soft sand and silica sand study; • Minutes of meeting with Central Bedfordshire Council; • Email inviting MPAs with silica sand to attend a national meeting to discuss silica sand supply; • West Sussex Minerals Joint Local Plan –Have 	<p>The overall outcome of the correspondence with other MPAs regarding silica sand is that authorities either have plans in place or are in the process of reviewing plans to ensure that they are compliant with national policy. Therefore at present adequate provision is being made to support the likely use of silica sand in industrial and manufacturing processes and there is no requirement for West Sussex to allocate specific</p>	<ul style="list-style-type: none"> • Annual Monitoring Report • Ongoing discussions with other MPAs through a national meeting.

		<p>Your Say on the Draft Joint Minerals Local Plan Consultation 2016: Outcomes Report (January, 2017);</p> <ul style="list-style-type: none"> • West Sussex Joint Minerals Local Plan: Submission - Statement of Consultation: Regulation 22 (May, 2017). 	<p>sites that needed to meet specific demands elsewhere in the UK. The Authorities have set up a national meeting to discuss the issue of silica sand supply and to ensure that there is ongoing and effective engagement on this issue.</p>	
<p>Maintaining an adequate supply of crushed rock</p>	<ul style="list-style-type: none"> • Targeted engagement on Background Papers, supply options and a draft JMLP; • DtC letter to MPAs who supply crushed rock. 	<ul style="list-style-type: none"> • Summary of engagement on Background Papers - workshop outcomes; • Summary of comments from targeted DtC letter; • West Sussex Minerals Joint Local Plan –Have Your Say on the Draft Joint Minerals Local Plan Consultation 2016: Outcomes Report (January, 2017); • West Sussex Joint Minerals Local Plan: Submission - Statement of Consultation: Regulation 22 (May, 2017). 	<p>Responses from exporting authorities confirmed that there is, and should continue to be, a sufficient supply of crushed rock to meet West Sussex's needs.</p>	<ul style="list-style-type: none"> • Annual Monitoring Report • Local Aggregate Assessment • Attendance at the SEEAWP meetings • Ongoing South East MPA Meetings.
<p>Maintaining an adequate supply of clay</p>	<ul style="list-style-type: none"> • Targeted engagement on Background Papers, supply options and a draft JMLP; • Communication with East Sussex County Council about supply options including supplying clay to West Hoathly Brickworks from Ashdown Brickworks. 	<ul style="list-style-type: none"> • Summary of engagement on Background Papers - workshop outcomes • Summary of comments from targeted DtC letter • Summary of comments on draft JMLP • Email communication from East Sussex County Council 	<p>Discussions with East Sussex County Council have revealed that there is no certainty that clay could be exported from sites within their plan area to serve West Hoathly brickworks.</p>	<ul style="list-style-type: none"> • Annual Monitoring Report

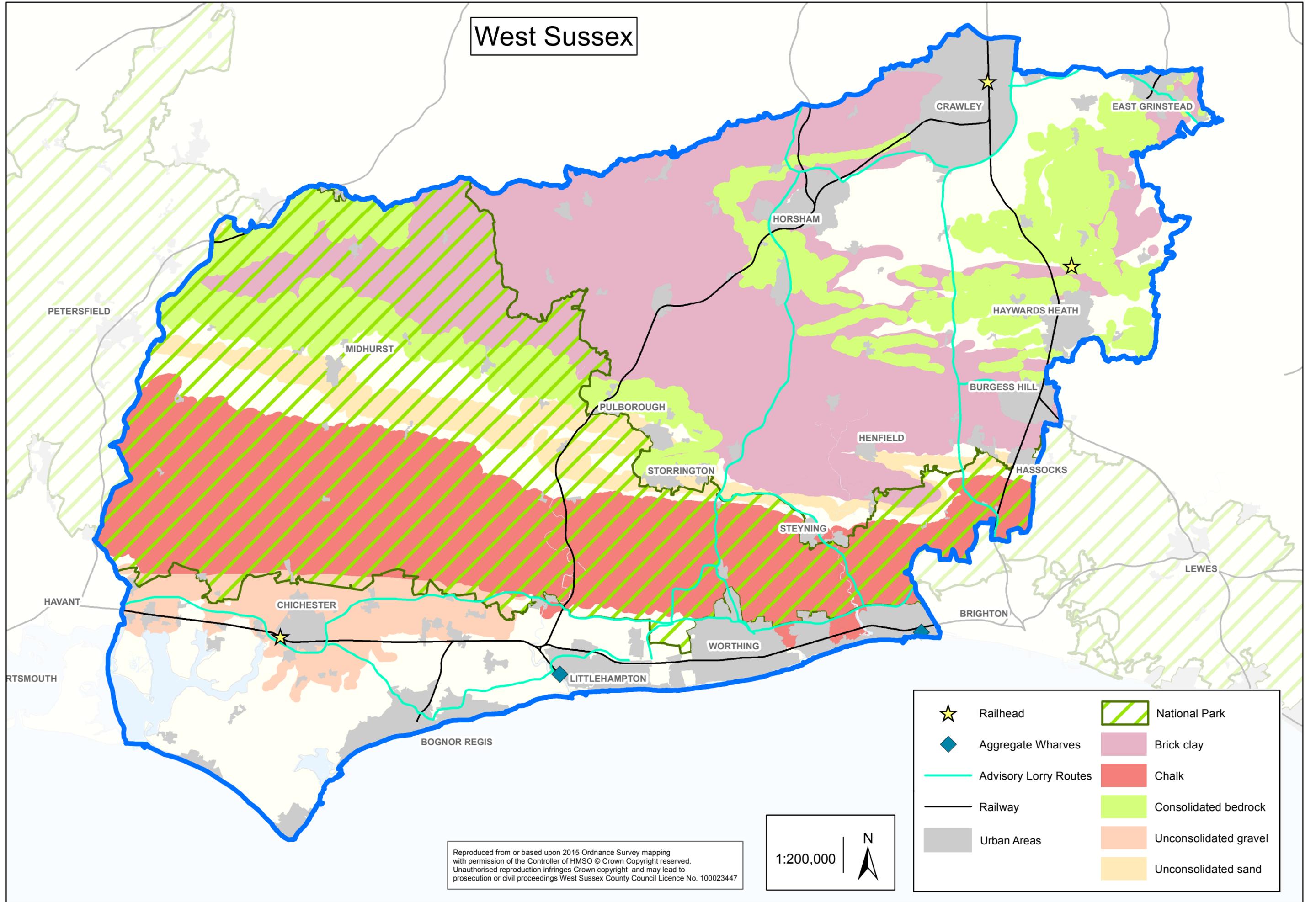
<p>Maintaining an adequate supply of marine dredged aggregates</p>	<ul style="list-style-type: none"> • Targeted engagement on Background Papers, supply options and a draft JMLP; • Email sent to Marine Management Organisation. Standard acknowledgement received. 	<ul style="list-style-type: none"> • Summary of engagement on Background Papers - workshop outcomes. 	<p>No response was received from the Marine Management Organisation (MMO) to the Regulation 18 or 19 consultations. A standard acknowledgement email was received setting out a number of documents that should be referred to.</p> <p>The issue of whether there are sufficient supplies of marine dredged aggregate is addressed in the West Sussex JMLP Background Document (January, 2017) as discussions have taken place with other stakeholders (not DtC bodies) who have provided information on this issue. Reference has been made to the relevant documents referred to in the MMO's standard email acknowledgement.</p>	<ul style="list-style-type: none"> • Local Aggregate Assessment • Attendance at the SEEAWP meetings
<p>Safeguarding Mineral Resources and Infrastructure (E.g. coated roadstone plants, asphalt plants, oil sites, railheads and recycled aggregate sites)</p>	<ul style="list-style-type: none"> • Targeted engagement on Background Papers; • Regulation 18 Plan consultation; • Meetings with Planning Policy Officers Group (PPOG); • Minerals Safeguarding Workshop. 	<ul style="list-style-type: none"> • Summary of engagement on Background Papers - workshop outcomes; • West Sussex Minerals Joint Local Plan –Have Your Say on the Draft Joint Minerals Local Plan Consultation 2016: Outcomes Report (January, 2017); • Minutes of meetings with 	<p>Comments from consultation and workshops taken into account in amending policy M9 and M10 of the JMLP and the Minerals Safeguarding Guidance.</p>	<ul style="list-style-type: none"> • Implementation of policy M9 and M10 and Minerals Safeguarding Guidance. • Regular liaison meetings with the District and Borough Councils through PPOG and other meetings

		<p>PPOG;</p> <ul style="list-style-type: none"> • Summary of Minerals Safeguarding Workshop; • West Sussex Joint Minerals Local Plan: Submission - Statement of Consultation: Regulation 22 (May, 2017). 		<p>will provide an opportunity for updates or assistance with implementing the policy and guidance;</p> <ul style="list-style-type: none"> • Annual Monitoring Report
Safeguarding wharves in Shoreham Harbour	<p>Discussions with Shoreham JAAP partners on background evidence, policy drafting and preparation of Statement of Common Ground.</p>	<ul style="list-style-type: none"> • Minutes of meetings with Shoreham Harbour JAAP Policy Sub Group; • Minutes of meetings with strategic partners; • Shoreham Harbour Statement of Common Ground; • West Sussex Minerals Joint Local Plan –Have Your Say on the Draft Joint Minerals Local Plan Consultation 2016: Outcomes Report (January, 2017); • Emails between WSCC and Shoreham JAAP partners 	<p>Discussions with strategic partners have led to the preparation of a SoCG which has been agreed and signed. Although the approach taken in policy M10 differs from what was agreed in the SOCG, the policy wording in the JMLP was agreed with Adur District Council.</p>	<ul style="list-style-type: none"> • Annual Monitoring Report • Ongoing discussions with strategic partners through JAAP planning policy sub-group • Updates to the SOCG to reflect policy in adopted JMLP (once adopted)
Safeguarding Railway Wharf at Littlehampton Harbour	<ul style="list-style-type: none"> • Discussions with Littlehampton Harbour Board and Arun District Council; • Comments from Reg 18 JMLP consultation. 	<ul style="list-style-type: none"> • Notes and emails from meetings and discussions with strategic partners; • West Sussex Minerals Joint Local Plan –Have Your Say on the Draft Joint Minerals Local Plan Consultation 2016: Outcomes Report (January, 2017). 	<p>Safeguarded area has been reduced to reflect the area of active wharf. The approach to safeguarding Railway Wharf, Littlehampton is consistent with NPPF as it is actively importing crushed rock to be used at the adjacent coated roadstone plant.</p>	<ul style="list-style-type: none"> • Annual Monitoring Report

			Redevelopment of the wharf would need to satisfy certain criteria in the policy.	
Identification of potential mineral sites	<ul style="list-style-type: none"> • Targeted engagement on minerals sites study; • West Sussex Minerals Joint Local Plan –Have Your Say on the Draft Joint Minerals Local Plan Consultation 2016: Outcomes Report (January, 2017); • Meetings with the Environment Agency; • Correspondence with the Environment Agency, Southern Water, Highways England, Natural England, the Historic Buildings and Monuments Commission for England. 	<ul style="list-style-type: none"> • Minerals Site Selection Report - Consultation summary reports; • Meeting notes; • Records of correspondence. 	<p>Comments were received from stakeholders and have been taken into account in deciding which sites should be taken forward and particular issues that need to be addressed through the development principles. Mid Sussex District Council raised some concerns about the allocation at West Hoathly but the other DtC bodies who responded to the West Sussex JMLP Proposed Submission Draft Consultation raised no further objections to the proposed allocations.</p>	<ul style="list-style-type: none"> • Annual Monitoring Report

Appendix A: Maps

West Sussex

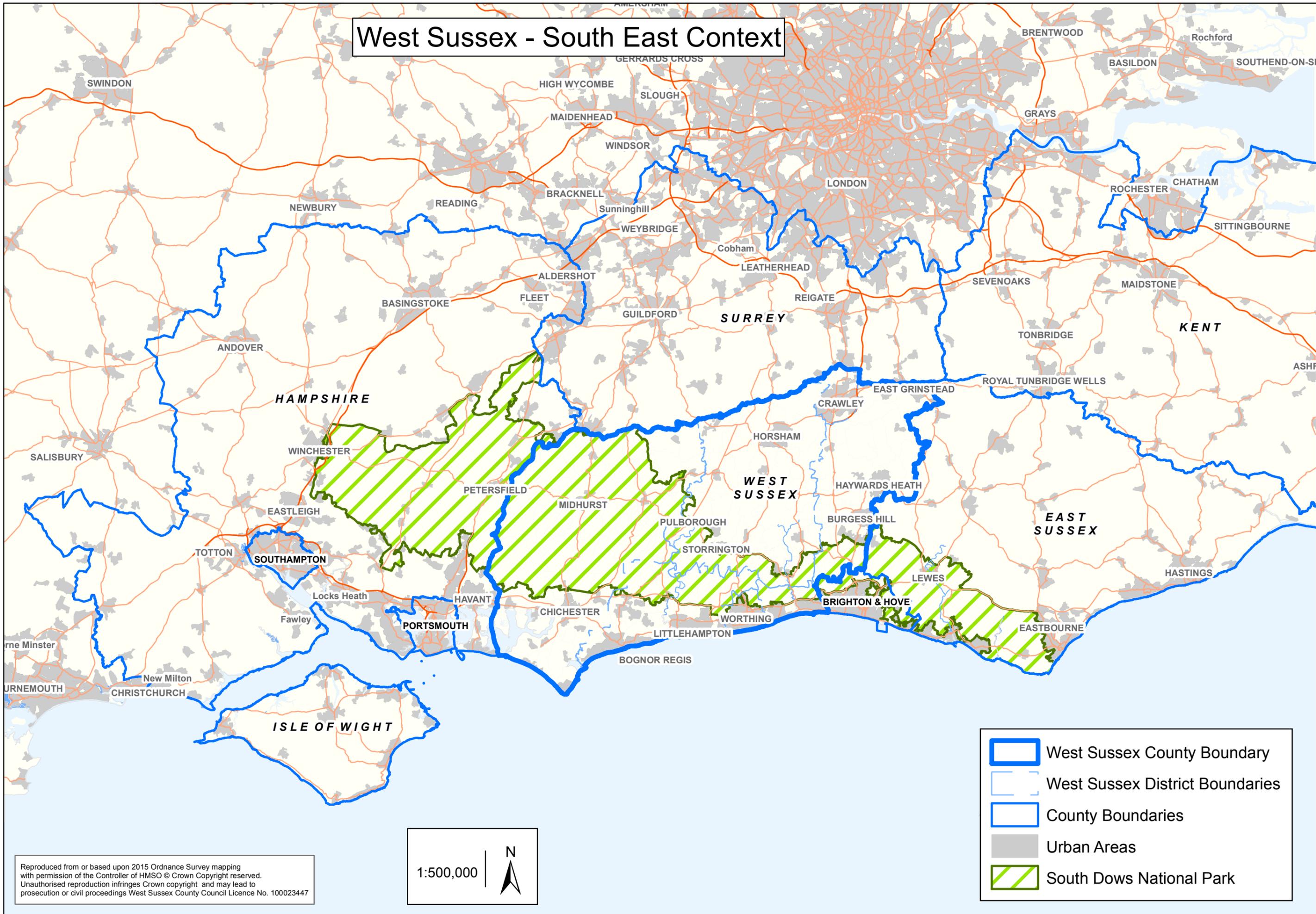


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★	Railhead		National Park
◆	Aggregate Wharves		Brick clay
	Advisory Lorry Routes		Chalk
	Railway		Consolidated bedrock
	Urban Areas		Unconsolidated gravel
			Unconsolidated sand

West Sussex - South East Context



- West Sussex County Boundary
- West Sussex District Boundaries
- County Boundaries
- Urban Areas
- South Downs National Park

1:500,000

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Appendix B: Audit Trail of Actions and Outcomes from Strategic Working

Strategic Priority: Maintaining an adequate supply of soft sand

The soft sand resource is constrained due to its location within, or adjacent to, the South Downs National Park which may restrict opportunities for future land won minerals development. One site, which falls outside the SDNP, has been allocated, but this will not allow supplies to be maintained at historic levels over the entire plan period. The evidence gathered as part of the JMLP has looked at whether there are alternative options (including reserves beyond West Sussex) that could meet the demand over the plan period.

The relevant strategic objective is:

3: *“to make provision for soft sand to meet the needs of West Sussex from outside the South Downs national park, where possible and only make provision for a declining amount of extraction within the SDNP over the plan period”.*

Evidence Base

- South Downs National Park Soft Sand Study (August, 2012).
- Joint West Sussex MJLP, Engagement Event – 8 July 2014: Summary of Outcomes (July 2014)
- Joint West Sussex MJLP, Engagement Event – 13 August 2014: Summary of Outcomes (August 2014)
- Background Paper 1: Spatial Portrait, Version 1 (June 2014)
- Background Paper 1: Spatial Portrait, Version 2 (December, 2014)
- Background Paper 2: Minerals in West Sussex, Version 1 (June, 2014)
- Background Paper 2: Minerals in West Sussex, Version 2 (December, 2014)
- Background Paper 3: Site Identification and Assessment Methodology, Version 1 (June, 2014)
- Background Paper 3: Site Identification and Assessment Methodology, Version 1 (December, 2014)
- West Sussex JMLP Proposed Submission Draft (Regulation 19) Minerals Site Selection Report (January, 2017)
- West Sussex Joint Minerals Local Plan: Assessment of Need for Aggregates: Local Aggregate Assessment (January, 2017)
- West Sussex Joint Minerals Local Plan Proposed Submission Draft (regulation 19) Background Document (January, 2017)
- West Sussex Joint Minerals Local Plan: Have Your Say on the Joint Minerals Local Plan Consultation 2016 Responses (January, 2017)
- West Sussex Joint Minerals Local Plan: Submission - Statement of Consultation (Regulation 22) (May, 2017)

These documents can be found on the West Sussex County Council website (www.westsussex.gov.uk/mwdf).

Strategic Partners

South East England Working Aggregates Party members (see para. 2.10)

Other Prescribed Bodies:

- Coast to Capital LEP;
- Local Nature Partnership;
- Natural England;
- Historic England;
- Environment Agency.
- Marine Management Organisation;

Authorities who export sand and gravel to West Sussex¹:

- Essex County Council;
- East Sussex County Council;
- Hampshire County Council;
- Kent County Council;
- Oxfordshire County Council;
- Surrey County Council

Actions

Action: Meeting of South East Mineral Planning Authorities

Partners: South East Mineral Planning Authorities

Outcome: Discussion about South East Mineral Planning Authorities approaches to Local Aggregate Assessments.

Date: 27 September 2013

Evidence: See Appendix D for minutes of the meeting (Ref: DtC01)

Action: SEEAWP meeting

Partners: South East Working Aggregates Party members

Outcome: The West Sussex LAA introduced and discussed. There was support for aggregate provision based on 10 year sales but for a separate provision for soft sand.

Date: 13 November 2013

Evidence: See Appendix D for minutes of the meeting (Ref: DtC02).

¹ Mineral Planning Authorities who export more than 1,000 tonnes of soft sand to West Sussex. Data from latest national survey (2014) and from data obtained from the British Geological Survey.

Action: South East Planning Authorities Meeting

Partners: South East Planning Authorities (SE MPA)

Outcome: Update provided to the SE MPAs on aggregate supply position. The Authorities (WSCC and SDNPA) reported that they were undertaking a site search methodology looking outside the park and at reasonable alternatives (including supply from other MPA). Kent County Council confirmed that they have potential reserves to last until 2040, that they supply other parts of the sub-region and there is one new site in the Preferred Options document which is in the AONB. Berkshire has similar issues to West Sussex due to the AONB. Evidence is needed for soft sand split if other MPAs are to support supply to West Sussex.

Date: 12 March 2014

Action: SEEAWP Meeting

Partners: South East Working Aggregates Party members

Outcome: A note outlining the scope of the West Sussex supply and demand work to support the LAA and JMLP was circulated to SEEAWP members. WSCC and SDNPA also requested help in gathering data to support this work.

Date: 9 July 2014

Evidence: See Appendix D for minutes of the meeting (Ref: DtC03a and DtC03b).

Action: Targeted engagement with stakeholders on the Background Papers involving two workshops in July and August 2014.

Partners: West Sussex Districts and Borough Councils, South East Mineral Planning Authorities and Statutory Consultees.

Outcome: The need for a separate landbank for soft sand and sharp sand and gravel was raised and the fact that aggregate markets transcend boundaries and that there is a need to look beyond local demand. The outcome of these events informed the preparation of the policies in the plan.

Date: 13 August 2014

Evidence: A summary of the outcomes from the workshop can be found on the West Sussex County Council website (www.westsussex.gov.uk/mwdf).

Action: Meeting with East Sussex County Council and Brighton and Hove City Council

Partners: East Sussex County Council and Brighton and Hove City Council

Outcome: Discussion about the supply and demand forecasting work² that WSCC and SDNPA were undertaking as part of the Local Aggregate Assessment. WSCC agreed to include data relating to investment/growth occurring in ESCC and B&HC.

Date: 1st October 2014

Evidence: A copy of the minutes is included in Appendix D (Ref: DtC04).

Action: SEEAWP Pre-Meeting

Partners: South East Mineral Planning Authorities (SE MPA)

Outcome: Discussion about the supply and demand work the Authorities were undertaking at the time and the link between mineral demand, housing and infrastructure growth. One MPA queried whether West Sussex has the land resource to meet increase in demand and if not, the import ability. WSCC commented that sharp sand and gravel sites have come forward and that the soft sand is heavily constrained and that the main issues with the JMLP revolve around the potential location of sites within the SDNP.

Date: 27/10/2014

Action: Meeting with East Sussex County Council and Brighton and Hove City Council

Partners: East Sussex County Council and Brighton and Hove City Council

Outcome: Further discussion about the supply and demand forecasting work³ that WSCC were undertaking as part of the Local Aggregate Assessment with particular reference to comments made by ESCC.

Date: 21st February 2015

Evidence: A copy of the minutes are included in Appendix D (Ref: DtC05).

² The outcomes of the supply and demand forecasting work were incorporated into the Local Aggregate Assessment.

³ The outcomes of the supply and demand forecasting work were incorporated into the Local Aggregate Assessment.

Action: Summary of comments on draft LAA (2015)

Partners: South East Mineral Planning Authorities, South West Aggregate Working Party, London Aggregates Working Party, Coast to Capital LEP, Marine Management Organisation, Crown Estate, Sussex Local Nature Partnership, Natural England.

Outcome: A summary of the comments received and how they were taken into account.

Date: February 2015

Evidence: See Appendix D for summary of comments (Ref: DtC06).

Action: SEEAWP Meeting

Partners: SEEAWP Members

Outcome: Confirmation that the draft LAA had been circulated by the SEEAWP Secretary and the he had confirmed that the coverage of the LAA was comprehensive and had taken local circumstances into account. It was noted that future allocations for aggregates would need to consider the implications of the SDNP designation.

Date: 23 February 2015

Evidence: See Appendix D for minutes of the meeting (Ref: DtC07).

Action: Draft LAA (2015) presented to SEEAWP

Partners: SEEAWP Secretary on behalf of SEEAWP

Outcome: Letter to confirm that SEEAWP have no comments to make on draft LAA.

Date: 27 February 2015

Evidence: See Appendix D for a copy of the letter (Ref: DtC08).

Action: Letters sent to stakeholders regarding soft sand supply as part of the DtC.

Partners: Essex County Council, Hampshire County Council, Surrey County Council, Kent County Council, Oxfordshire County Council, East Sussex County Council and Brighton and Hove City Council

Outcome: The outcome of the responses is that there are reserves of soft sand outside the SDNP that could supply West Sussex and that none of the authorities that responded were relying on imports of aggregates from West Sussex.

- Surrey County Council confirmed that they can continue to supply soft sand to West Sussex at previous rates until 2031 but that supplies of sand and gravel are likely to run out towards the end of the next decade and they will become increasingly reliant

on alternative supplies.

- Kent County Council could have a surplus of soft sand and possibly a margin of flexibility for its anticipated plan period; however, there is no certainty that the replenishment sites could come forward. A significant amount of replenishment reserves are in one site which is in the setting of the North Downs AONB (the letter is not clear whether it is within the AONB or just outside). If Kent County Council does not rely on Shrine Farm then surplus would reduce and Kent's role as a net soft sand supplier may not be secure.
- Oxfordshire County Council confirmed that they do not rely on, or propose the supply of aggregates minerals from West Sussex to meet their needs.
- Essex County Council also confirmed that the import/export position with West Sussex was correct which means there is no expectation that Essex will rely on minerals imported from West Sussex in the future.

Date: September 2015

Evidence: See Appendix D for copies of responses (Ref: DtC09a, 09b, 09c, 09d and 09e).

Action: South East Authorities Meeting

Partners: South East Mineral Planning Authorities (SE MPA)

Outcome: The Authorities provided an update noting that it was unlikely to allocate enough sites to meet demand due to the majority of sites being in the SDNP and that demand for sharp sand and gravel is insufficient to justify allocating further sites. The comment was made in the meeting that there will be pressure for soft sand outside of the national parks but there may be limited options. This will lead to more of a pressure for sharp sand and gravel and soft sand for the region.

Date: 10 November 2015

Action: SEEAWP Meeting

Partners: SEEAWP members

Outcome: The SEEAWP Secretary noted the conclusion from the last round of LAAs that the south east was making an appropriate contribution to aggregate supply regionally and nationally was still valid. The Authorities reported that soft sand supply was a key issue for West Sussex, that demand was increasing and they should look at different scenarios.

Date: 10 November 2015

Evidence: See Appendix D for minutes of the meeting (Ref: DtC10).

Action: Draft LAA (2015) presented to SEEAWP

Partners: SEEAWP Secretary on behalf of SEEAWP

Outcome: Letter to confirm that SEEAWP have no comments to make on draft LAA.

Date: 23 November 2015

Evidence: See Appendix D for a copy of the letter (Ref: DtC11).

Action: Targeted consultation on draft LAA

Partners: South East Mineral Planning Authorities, South West Aggregate Working Party, London Aggregates Working Party, Coast to Capital LEP, Marine Management Organisation, Crown Estate, Sussex Local Nature Partnership, Natural England.

Outcome: Some general comments were raised for clarification and about forecasting aggregate demand by one authority and query about the link between sales and economic growth. The LAA was amended in light of comments received. The LAA was amended in light of comments received.

Date: December 2015

Evidence: See Appendix D for a summary of the comments (Ref: DtC12).

Action: Draft JMLP Regulation 18 Consultation

Partners: All stakeholders on the WSCC and SDNPA consultation database which includes the relevant strategic partners listed in Appendix C.

Outcome: Comments raised by DtC bodies on this issue were:

- East Sussex County Council would be concerned if 'managed retreat' would lead to pressure for additional soft sand from East Sussex to serve the wider area;
- Hampshire County Council commented that there is little scope to source soft sand through imports from Hampshire as their plan also has an under provision and it would deplete the provision in the Hampshire Minerals and Waste Plan faster than anticipated;
- Surrey County Council was supportive of the flexibility built into the Plan through Policy M2 and that it is essential that supply and demand is monitored carefully through the LAA so that soft sand provision to meet future demand in the south east can be provided in the most sustainable way;
- Kent CC repeated the statement given in 2015 which suggests Kent could have a surplus of soft sand (14.24mt surplus), if the identified replenishment sites come forward. This surplus could meet West Sussex's 3.724mt shortfall. However, there is no certainty that the replenishment sites will come forward or that Kent CC will be able to meet demand for soft sand within West Sussex. It is noted that a significant amount (8mt) of potentially replenishing material is tied up in one site (Shrine Farm).

Date: 14 April 2016 to 17 June 2016

Evidence: The West Sussex Minerals Joint Local Plan –Have Your Say on the Draft Joint Minerals Local Plan Consultation 2016: Outcomes Report (January, 2017) can be found online at: www.westsussex.gov.uk/mwdf

Action: South East Authorities Meeting (SE MPA)

Partners: SE MPAs

Outcome: The issue of soft sand supply was summarised and recognition of the soft sand supply issue was sought from SE MPAs as part of a Statement of Common Ground.

Date: 14 July 2016

Action: SEEAWP Meeting

Partners: SEEAWP members

Outcome: Discussion about supply of soft sand and it was noted that the availability of soft sand in designated areas is an issue that is leading some MPAs (Essex and West Sussex) to rely on others for their soft sand supply. It was noted in the minutes that there is a need to look more widely at soft sand in the South East and recognise that it is an issue. Agreed that soft sand should be given more prominence in Aggregate Monitoring Report.

Date: 14 July 2016

Evidence: See Appendix D for minutes of the meeting (Ref: DtC13).

Action: SEEAWP Pre-Meeting

Partners: SE MPAs

Outcome: WSCC raised the issue of a shortfall in soft sand and that there is one allocation in the JMLP (Ham Farm) which will help to meet some of the shortfall. The draft Statement of Common Ground was discussed and it was noted that all the Councils had responded, except for Kent who will do in due course. Comments raised by the authorities will be taken into account and a further draft would be circulated with a final version for sign off in February 2017.

Date: 21 November 2016

Action: SEEAWP Meeting

Partners: SEEAWP members

Outcome: WSCC raised the issue of the shortfall in soft sand due to the constraints of the SDNP. The minutes of the meeting provide confirmation that the LAA has been agreed, subject to the inclusion of a conclusion and amending a figure number.

Date: 21 November 2016

Evidence: See Appendix D for minutes of the meeting (Ref: DtC14).

Action: Draft LAA (2016) presented to SEEAWP

Partners: SEEAWP Secretary on behalf of SEEAWP

Outcome: Letter to confirm that SEEAWP have no comments to make on draft LAA.

Date: 19 December 2016

Evidence: See Appendix D for a copy of the letter (Ref: DtC15).

Action: Proposed Submission Draft JMLP Regulation 19 Consultation

Partners: All stakeholders on the WSCC and SDNPA consultation database which includes the relevant strategic partners listed in Appendix C.

Outcome: Comments raised by DtC bodies on this issue were:

- Surrey County Council – essential that supply and demand is monitored through the LAA to ensure that soft sand provision to meet future demand in the south east can be provided in the most sustainable way;
- Hampshire County Council – Little scope to cover the soft sand shortfall in West Sussex through imports from Hampshire. An increase in provision of soft sand from Hampshire would be either unfeasible or require further site which would put pressure on designated areas.

Date: 16 January 2017 to 13 March 2017.

Evidence: The West Sussex Joint Minerals Local Plan: Submission - Statement of Consultation: Regulation 22 (May, 2017) can be found online at:

www.westsussex.gov.uk/mwdf

Action: Meeting and correspondence with Hampshire County Council.

Partners: Hampshire County Council

Outcome: Email to confirm that Hampshire County Council are happy to withdraw their objection subject to changes being made to the supporting text of Policy M13 (paragraph 8.3.7) to clarify that the search for alternatives outside the nationally designated landscape should not be limited to the Plan area but should extend elsewhere within those areas identified nationally as having potential which are not themselves subject to national landscape designations.

Date: 25 April 2017

Evidence: See Appendix D for a copy of the letter (Ref: DtC16).

Action: Correspondence about the Soft Sand Statement of Common Ground.

Partners: South East MPA

Outcome: Correspondence with the final version of the Statement of Common Ground attached and asking each authority to sign it off.

Date: 25 April 2017

Evidence: See Appendix D for a copy of the correspondence (Ref: DtC17).

Outcomes from Strategic Working

The Authorities have met with, and consulted, the SE MPA and SEEAWP members on a regular basis to discuss the issue of the supply of soft sand in West Sussex. The SE MPA have been consulted on the methodology for forecasting the supply and demand for aggregates and the Local Aggregate Assessments and their views have been taken into account. WSCC and SDNPA have consistently raised the issue of soft sand supply in West Sussex and that they may be looking to compensate for this by looking for supplies from elsewhere. A targeted DtC letter revealed that there are reserves of soft sand outside the SDNP that could supply West Sussex and that none of the authorities that responded were relying on imports of soft sand from West Sussex. The South East MPAs have agreed to the preparation of a Statement of Common Ground (SoCG). The SoCG will explain the issues with soft sand supply in the South East.

Submission Stage Update

The Authorities met with Hampshire County Council to discuss their representation at Regulation 19 stage. The Authorities agreed amendments to the supporting text of Policy M13 to clarify that the search for alternatives outside the nationally designated landscape should not be limited to the Plan area but should extend elsewhere within those areas identified nationally as having potential which are not themselves subject to national landscape designations. Hampshire County Council subsequently withdrew their objection to the Plan.

The wording of the SoCG has been agreed by the SE MPAs and is now in the process of being signed off.

Ongoing Cooperation

The preparation of the LAA on an annual basis will help the Authorities to monitor the extent to which the demand for minerals is being met within West Sussex. The Authorities will continue to attend SEEAWP meetings and other meetings with South East Authorities where the supply of soft sand will be discussed and monitored.

Strategic Priority: Maintaining an adequate supply of sharp sand and gravel

West Sussex has one existing permitted sharp sand and gravel site (Kingsham, Chichester) with a reserve of 900,000 tonnes. The LAA (January, 2017) sets out the scenarios for the requirement for sharp sand and gravel over the plan period and concludes that there is no need to plan for additional land won sharp sand and gravel reserves.

The relevant strategic objectives are:

1: *"to promote the prudent and efficient production and use of minerals, having regard to the market demand and constraints in the Plan area" and*

2: *"to maximise and prioritise the supply and use of secondary and recycled aggregates before supply and use of primary sources. In particular to reduce reliance on land-won aggregates".*

Evidence Base

- Joint West Sussex MJLP, Engagement Event – 8 July 2014: Summary of Outcomes (July 2014)
- Joint West Sussex MJLP, Engagement Event – 13 August 2014: Summary of Outcomes (August 2014)
- Background Paper 1: Spatial Portrait, Version 1 (June 2014)
- Background Paper 1: Spatial Portrait, Version 2 (December, 2014)
- Background Paper 2: Minerals in West Sussex, Version 1 (June, 2014)
- Background Paper 2: Minerals in West Sussex, Version 2 (December, 2014)
- Background Paper 3: Site Identification and Assessment Methodology, Version 1 (June, 2014)
- Background Paper 3: Site Identification and Assessment Methodology, Version 1 (December, 2014)
- West Sussex Joint Minerals Local Plan: Assessment of Need for Aggregates: Local Aggregate Assessment (January, 2017)
- West Sussex Joint Minerals Local Plan Proposed Submission Draft (Regulation 19): Minerals Sites Selection Report (January, 2017)
- West Sussex Minerals Joint Local Plan –Have Your Say on the Draft Joint Minerals Local Plan Consultation 2016: Outcomes Report (January, 2016)
- West Sussex Joint Minerals Local Plan: Submission – Statement of Consultation (May, 2017)
- West Sussex Joint Minerals Local Plan: Proposed Submission Draft (Regulation 19) Background Document (January, 2017)

These documents can be found on the West Sussex County Council website

(www.westsussex.gov.uk/mwdf).

Strategic Partners

South East England Working Aggregates Party members (para. 2.10)

Other Prescribed Bodies:

- Coast to Capital LEP;
- Local Nature Partnership;
- Natural England;
- Historic England;
- Environment Agency.

Actions

Action: Meeting of SE Authorities

Partners: South East Mineral Planning Authorities

Outcome: Discussion about MPA's approaches to LAAs.

Date: 27 September 2013

Evidence: See Appendix D for minutes of the meeting (Ref: DtC01)

Action: SEEAWP meeting

Partners: South East Working Aggregates Party members

Outcome: The West Sussex LAA introduced and discussed. There was support for aggregate provision based on 10 year sales but for a separate provision for soft sand.

Date: 13 November 2013

Evidence: See Appendix D for minutes of the meeting (Ref: DtC02)

Action: SEEAWP Meeting

Partners: South East Working Aggregates Party members

Outcome: A note outlining the scope of the West Sussex supply and demand work⁴ to support the LAA and JMLP was circulated to SEEAWP members. The Authorities also requested help in gathering data to support this work.

⁴ The outcomes of the supply and demand forecasting work were incorporated into the Local Aggregate Assessment.

Date: 9 July 2014

Evidence: See Appendix D for minutes of the meeting (Ref: DtC03a and DtC03b).

Action: Targeted engagement with stakeholders on the Background Papers involving two workshops in July and August 2014.

Partners: West Sussex Districts and Borough Councils, South East Mineral Planning Authorities and Statutory Consultees.

Outcome: The outcome of these events informed the preparation of the policies in the plan. In relation to the supply of sharp sand and gravel, the need for a separate landbank for soft sand and sharp sand was raised.

Date: 13 August 2014

Evidence: A summary of the outcomes from the workshop can be found on the West Sussex County Council website (www.westsussex.gov.uk/mwdf).

Action: Meeting with East Sussex County Council and Brighton and Hove City Council

Partners: East Sussex County Council and Brighton and Hove City Council

Outcome: Discussion about the supply and demand forecasting work⁵ that the Authorities were undertaking as part of the Local Aggregate Assessment. It was agreed to include data relating to investment/growth occurring in East Sussex and Brighton and Hove.

Date: 1st October 2014

Evidence: A copy of the minutes are included in Appendix D (Ref: DtC04).

Action: South East Authorities Meeting

Partners: South East Mineral Planning Authorities (SE MPA)

Outcome: Discussion about the supply and demand work⁶ the Authorities were undertaking at the time and the link between mineral demand, housing and infrastructure growth. The ability of West Sussex to meet the expected demand was discussed, including whether there are land resources to meet demand.

Date: 27 October 2014

⁵ The outcomes of the supply and demand forecasting work were incorporated into the Local Aggregate Assessment.

Action: Meeting with East Sussex County Council and Brighton and Hove City Council

Partners: East Sussex County Council and Brighton and Hove City Council

Outcome: Further discussion about the supply and demand forecasting work that WSCC were undertaking as part of the Local Aggregate Assessment with particular reference to comments made by East Sussex County Council.

Date: 21st February 2015

Evidence: A copy of the minutes is included in Appendix D (Ref: DtC05).

Action: Summary of comments on draft LAA (2015)

Partners: South East Mineral Planning Authorities; South West Aggregate Working Party; London Aggregates Working Party; Coast to Capital LEP; Marine Management Organisation; Crown Estate, Sussex Local Nature Partnership; Natural England.

Outcome: Comments related to points of clarification and a query about the approach to estimating recycled aggregated production capacity.

Date: February 2015

Evidence: A summary of the comments received and how they were taken into account are included in Appendix D (Ref: DtC06)

Action: SEEAWP Meeting

Partners: SEEAWP members

Outcome: Confirmation that the draft LAA had been circulated by the SEEAWP Secretary and that he had confirmed that the coverage of the LAA was comprehensive and had taken local circumstances into account. It was noted that future allocations for aggregates would need to consider the implications of the SDNP designation. Query over marine aggregate figures which were being investigated by the Authorities.

Date: 23 February 2015

Evidence: See Appendix D for minutes of the meeting (Ref: DtC07).

Action: Draft LAA (2015) presented to SEEAWP

Partners: SEEAWP Secretary on behalf of SEEAWP

Outcome: Letter to confirm that SEEAWP have no comments to make on draft LAA.

Date: 27 February 2015

Evidence: See Appendix D for a copy of the letter (Ref: DtC08).

Action: South East Authorities Meeting

Partners: South East Mineral Planning Authorities (SE MPA)

Outcome: The Authorities raised the point that sharp sand and gravel and soft sand average sales were reducing. Query from one authority whether there were sharp sand and gravel sites that were not being brought forward through the plan process. WSCC confirmed that site appraisal work had looked at this issue and that other sites were less constrained. WSCC confirmed that current level of demand did not support allocation of further sites for sharp sand and gravel.

Date: 10 November 2015

Action: SEEAWP Meeting

Partners: SEEAWP members

Outcome: The SEEAWP Secretary noted the conclusion from the last round of LAAs that the south east was making an appropriate contribution to aggregate supply regionally and nationally was still valid.

Date: 10 November 2015

Evidence: See Appendix D for a copy of the minutes (Ref: DtC10).

Action: Draft LAA (2015) presented to SEEAWP

Partners: SEEAWP Secretary on behalf of SEEAWP

Outcome: Letter to confirm that SEEAWP have no comments to make on draft LAA.

Date: 23 November 2015

Evidence: See Appendix D for a copy of the letter (Ref: DtC11).

Action: Targeted consultation on draft LAA (2016)

Partners: South East Mineral Planning Authorities, South West Aggregate Working Party, London Aggregates Working Party, Coast to Capital LEP, Marine Management Organisation, Crown Estate, Sussex Local Nature Partnership, Natural England.

Outcome: Some general comments were raised for clarification and about forecasting

aggregate demand by one authority and query about the link between sales and economic growth. The LAA was amended in light of comments received.

Date: December 2015

Evidence: See Appendix D for a summary of the comments (Ref: DtC12).

Action: Draft JMLP Regulation 18 Consultation

Partners: All stakeholders on the WSCC and SDNPA consultation database which includes the relevant strategic partners listed in Appendix C.

Outcome: No comments were raised by DtC bodies about the supply of sharp sand and gravel.

Date: 14 April 2016 to 17 June 2016

Evidence: The West Sussex Minerals Joint Local Plan –Have Your Say on the Draft Joint Minerals Local Plan Consultation 2016: Outcomes Report (January, 2017) can be found online at: www.westsussex.gov.uk/mwdf

Action: South East Authorities Meeting

Partners: South East Authorities (SE MPA)

Outcome: WSCC presented their position that there is an adequate supply of sharp sand and that there was an increase in wharf use for landing marine dredged sand and gravel.

Date: 21 November 2016

Action: SEEAWP Meeting

Partners: SEEAWP members

Outcome: WSCC informed SEEAWP that sharp sand and gravel sales had fallen and that there is a large landbank, the majority of which is from one site which hasn't started production yet. The minutes of the meeting provide confirmation that the LAA has been agreed, subject to the inclusion of a conclusion and amending a figure number.

Date: 21 November 2016

Evidence: See Appendix D for minutes of the meeting (Ref: DtC14).

Action: Draft LAA (2016) presented to SEEAWP

Partners: SEEAWP Secretary on behalf of SEEAWP

Outcome: Letter to confirm that SEEAWP have no comments to make on draft LAA.

Date: 19 December 2016

Evidence: See Appendix D for a copy of the letter (Ref: DtC15).

Action: Proposed Submission Draft JMLP Regulation 19 Consultation

Partners: All stakeholders on the WSCC and SDNPA consultation database which includes the relevant strategic partners listed in Appendix C.

Outcome: Comments raised by DtC bodies on this issue were:

- East Sussex County Council – no objection to the JMLP approach to the provision of sharp sand and gravel;
- Surrey County Council – Surrey is likely to run out of land-won sharp sand and gravel resources by around 2030 and will become increasingly reliant on alternative sources of supply such as from wharves in Shoreham. It would be helpful to acknowledge anticipated increase in demand for imported sharp sand and gravel in neighbouring authorities such as Surrey.
- Northamptonshire County Council – Concern about the lack of a provision in policy M1. Policy should include quantity of sharp sand and gravel provision over the plan period.

Date: 16 January 2017 to 13 March 2017.

Evidence: The West Sussex Joint Minerals Local Plan: Submission - Statement of Consultation: Regulation 22 (May, 2017) can be found online at:
www.westsussex.gov.uk/mwdf

Outcomes from Strategic Working

The Authorities have met with, and consulted, the SE MPA and SEEAWP members on a regular basis to discuss the issue of the supply of sharp sand and gravel in West Sussex. The SE MPA have been consulted on the methodology for forecasting the supply and demand for aggregates and the Local Aggregate Assessments and their views have been taken into account. Through these discussions, WSCC and SDNPA have informed the SE MPA that there is no requirement to make additional provision for sharp sand and gravel over the plan period due to a large landbank which has not been disputed.

Submission Stage Update

The JMLP already addresses the comments raised by the DtC bodies at Regulation 19 stage. Whilst the Plan provides an indication of the current demand for aggregates it notes that this will change over time and so the demand for aggregates is dictated by the Local Aggregates Assessment. Also, as stated in paragraph 6.2.9. "any proposal for the development of a site for the extraction of land won sharp sand and gravel that does come forward would be considered against policy M1".

Ongoing Cooperation

The preparation of the LAA on an annual basis will help the Authorities to monitor the extent to which the demand for soft sand is being met within West Sussex. The Authorities will continue to attend SEEAWP meetings and meetings with other South East Authorities where the supply of sharp sand and gravel will be discussed and monitored. The evidence shows that there is adequate provision for sharp sand and gravel to meet demand over the plan period and this has not been disputed by the Strategic Partners through DtC discussions.

Strategic Priority: Maintaining an adequate supply of silica sand

Silica sand (also known as 'industrial sand') is found in very few parts of the United Kingdom and is an industrial mineral of national importance. In West Sussex it occurs in the upper reaches of the Lower Greensand Formation and the Silica Sand Study (2016) confirms that most if not all of the Folkestone Formation sands within the study are likely to be capable of being defined as 'silica sands' in the broadest sense. The Folkestone Formation falls almost entirely within the SDNP therefore the need for the extraction of silica sand must be balanced against environmental and amenity constraints and take account of national policy concerning development within National Parks.

Government planning policy recommends that authorities *"co-operate with neighbouring and more distant authorities to co-ordinate the planning of industrial minerals to ensure that adequate provision is made to support their likely use in industrial and manufacturing processes"*. Government policy recognises that industrial minerals are essential raw materials for a wide range of downstream manufacturing industries and their economic importance extends well beyond the sites from which they are extracted.

The relevant strategic objectives are:

- 1: *"to promote the prudent and efficient production and use of minerals, having regard to the market demand and constraints in the Plan area"*;
- 4: *"to protect the South Downs National Park by only providing for silica sand in exceptional circumstances and when in the public interest"*.

Evidence base

- Joint West Sussex MJLP, Engagement Event – 8 July 2014: Summary of Outcomes (July 2014)
- Joint West Sussex MJLP, Engagement Event – 13 August 2014: Summary of Outcomes (August 2014)
- Background Paper 2: Minerals in West Sussex, Version 1 (June, 2014)
- Background Paper 2: Minerals in West Sussex, Version 2 (December, 2014)
- Background Paper 3: Site Identification and Assessment Methodology, Version 1 (June, 2014)
- Background Paper 3: Site Identification and Assessment Methodology, Version 1 (December, 2014)
- Silica Sand Study (November, 2016)
- West Sussex Joint Minerals Local Plan: Proposed Submission Draft (Regulation 19) Background Document (January, 2017)
- West Sussex Joint Minerals Local Plan: Regulation 18 Consultation Report (January, 2017)
- West Sussex Joint Minerals Local Plan: Submission - Statement of Consultation (Regulation 22) (May, 2017)

These documents can be found on the West Sussex County Council website (www.westsussex.gov.uk/mwdf).

Strategic Partners

Authorities with Silica Sand resources:

- Durham County Council
- Dorset County Council
- Norfolk County Council
- Cheshire East Council
- Central Bedfordshire Council
- Fife Council
- Lancashire County Council
- Hertfordshire County Council
- Nottinghamshire County Council
- North Yorkshire County Council
- North Yorkshire Dales National Park
- Surrey County Council
- Staffordshire County Council
- North Lincolnshire Council
- Kent County Council
- Highland Council
- Hampshire County Council
- East Sussex and Brighton and Hove County Council

Actions

Action: Targeted engagement with stakeholders on the Background Papers involving two workshops in July and August 2014.

Partners: West Sussex Districts and Borough Councils, South East Mineral Planning Authorities and Statutory Consultees.

Outcome: Comments included the need for evidence about the geological characteristics of the Folkestone Formation and that there is a lack of evidence about the suitability of the resource. Furthermore it was noted that to produce silica sand of glass making quality would require extensive processing and considerable investment.

Date: 13 August 2014

Evidence: A summary of the outcomes from the workshop can be found on the West Sussex County Council website (www.westsussex.gov.uk/mwdf).

Action: Letters sent out to stakeholders

Partners: Durham County Council, Dorset County Council, Norfolk County Council, Cheshire East Council, Central Beds Council, Lancashire County Council, Hertfordshire County Council, Nottinghamshire County Council, North Yorkshire County Council, Surrey County Council,

Staffordshire County Council, Lincolnshire County Council, Hampshire County Council, East Sussex and Brighton and Hove County Council

Outcome: The overall outcome of the correspondence with other MPAs regarding silica sand is that authorities either have plans in place or are in the process of reviewing plans to ensure that they are compliant with national policy. None of the respondents commented that there was an unmet need for silica sand or that there was an issue of security of supply. Therefore at present adequate provision is being made to support the likely use of silica sand in industrial and manufacturing processes and there is no requirement for West Sussex to allocate specific sites that needed to meet specific demands elsewhere in the UK. No responses were received from Dorset County Council, Lincolnshire County Council or East Sussex County Council.

Date: 11/09/2015

Evidence: See Appendix D for a copy of the comments received (Ref: DtC18a, DtC18b, DtC18c, DtC18d, DtC18e, DtC18f, DtC18g, DtC18h, DtC18i, DtC18j, DtC18k)

Action: Draft JMLP Regulation 18 Consultation

Partners: All stakeholders on the WSCC and SDNPA consultation database which includes all the strategic partners listed in Appendix C.

Outcome: Comments raised by DtC bodies on this issue were:

- Norfolk CC commented that there is less certainty that Norfolk would be able to meet any shortfall in the national demand for silica sand, especially glass sand and that the Authorities should reconsider the need for silica sand extraction within West Sussex (i.e. the SDNP). They also noted the economic importance of silica sand extends well beyond the local area in which it is extracted and that sites in the National Park area should not be automatically discounted.
- Central Bedfordshire Council commented that the Plan fails to realistically assess current reserves of silica sand within UK and so dismisses potential sites without proper consideration, i.e. the need may be more imminent than suggested.

Date: 14 April 2016 to 17 June 2016

Evidence: The West Sussex Minerals Joint Local Plan –Have Your Say on the Draft Joint Minerals Local Plan Consultation 2016: Outcomes Report (January, 2017) can be found online at: www.westsussex.gov.uk/mwdf

Action: Discussions with Fife Council

Partners: Fife Council

Outcome: Although there are additional sources of high grade silica sand in Scotland, one of

these is primarily dedicated to glass production in Scotland and the other two are already part of the existing supply pattern for the major glass manufacturing companies in northern England. Whilst those sites have substantial reserves and resources, it may be possible that these sources could increase their rates of output to make up for the depletion of reserves in England, though further work is needed to confirm this.

Date: 3 August 2016

Evidence: Details of the discussions with Fife Council are included in the Silica Sand Study (2016) which can be found online at www.westsussex.gov.uk/mwdf

Action: Proposed Submission Draft JMLP Regulation 19 Consultation

Partners: All stakeholders on the WSCC and SDNPA consultation database which includes the relevant strategic partners listed in Appendix C.

Outcome: Comments raised by DtC bodies on this issue were:

- Central Bedfordshire Council – Consider that the level of cooperation regarding the supply of silica sand has been disappointing and there has been no consultation or discussion over and above the statutory process.

Date: 16 January 2017 to 13 March 2017.

Evidence: The West Sussex Joint Minerals Local Plan: Submission - Statement of Consultation: Regulation 22 (May, 2017) can be found online at: www.westsussex.gov.uk/mwdf

Action: Meeting with Central Bedfordshire Council

Partners: Central Bedfordshire Council

Outcome: It was also agreed to set up a national meeting with Mineral Planning Authorities with silica sand resources to discuss the issue and to ensure that there is ongoing and effective engagement on this issue.

Date: 17 March 2017

Evidence: At the time of publication, the notes of the meeting were being finalised.

Action: Email invitation to attend a national meeting of Mineral Planning Authorities with silica sand reserves and resources

Partners: See list of strategic partners above.

Outcome: A first meeting of MPAs in England with a silica sand resource was held in London on 19 May 2017. After lengthy discussion it was agreed to work towards an agreed Statement of Common Ground in 2017. It was also agreed that the MPAs would meet again later this year and henceforth meet on a regular basis, possibly annually. Meeting minutes to be agreed.

Date: 19 May 2017

Evidence: At the time of publication, the notes of the meeting were being finalised. Please see email invitation to authorities (Ref: DtC019).

Outcomes from strategic working

Targeted engagement, with authorities with silica sand resources, revealed that Norfolk, Nottinghamshire, North Yorkshire, Surrey, Central Bedfordshire and Kent had permitted reserves of silica sand and none of the authorities commented that there was unmet need or a problem with security of supply. Responses as part of the Regulation 18 consultation revealed that Norfolk CC was less certain that they would be able to meet any shortfall in the national demand for silica sand, especially glass sand and that the Authorities should reconsider the need for silica sand extraction within West Sussex (i.e. the SDNP). They also noted the economic importance of silica sand extends well beyond the local area in which it is extracted and that sites in the National Park area should not be automatically discount. Central Bedfordshire Council commented that the Plan fails to realistically assess current reserves of silica sand within UK and so dismisses potential sites without proper consideration, i.e. the need may be more imminent than suggested. The Authorities have responded to these concerns through the preparation of a Silica Sand Study (November, 2016) to support the strategy in the JMLP.

Submission Stage Update:

The Authorities met with Central Bedfordshire Council in March 2017 to discuss the issue of silica sand supply. It was also agreed to set up a national meeting with Mineral Planning Authorities with silica sand resources to discuss the issue and to ensure that there is ongoing and effective engagement on this issue. Following the meeting with Central Bedfordshire in May 2017, they withdrew their objection to the plan.

Ongoing cooperation

Continued and close cooperation between the relevant MPAs in England and Scotland (through a national silica sand meeting) will be needed in order to monitor the availability of permitted reserves and to develop a suitably balanced, long term national strategy for silica sand production within the UK.

Strategic Priority: Maintaining an adequate supply of crushed rock

West Sussex relies heavily on the import of crushed rock because it has no indigenous resources of its own. Imports generally come from Somerset and Derbyshire via rail to the five railheads in West Sussex. Crushed rock is also imported by sea to wharves in Littlehampton and Shoreham. Crushed rock imports to the wharf at Littlehampton serve the adjacent coated roadstone plant. The JMLP safeguards the existing railheads in West Sussex in order to ensure that the ability to continue to import crushed rock is maintained over the Plan period. DtC discussions have therefore sought to ascertain that the supply of crushed rock can continue over the plan period. Data, taken from the AM2014 Survey, indicates that West Sussex is heavily reliant on the importation of crushed rock from Somerset, Leicestershire and Cornwall. Small amounts of crushed rock (less than 10,000 tonnes) are also imported from Cornwall, Leicestershire, Powys, Northumberland, Shropshire, Cambridgeshire, South Gloucestershire, Devon, Dorset, Gloucester and North Somerset.

The relevant strategic objective is:

1: *"to promote the prudent and efficient production and use of minerals, having regard to the market demand and constraints on supply in the plan area".*

Evidence base

- Joint West Sussex MJLP, Engagement Event – 8 July 2014: Summary of Outcomes (July 2014)
- Joint West Sussex MJLP, Engagement Event – 13 August 2014: Summary of Outcomes (August 2014)
- Background Paper 1: Spatial Portrait, Version 1 (June 2014)
- Background Paper 1: Spatial Portrait, Version 2 (December, 2014)
- Background Paper 4: Safeguarding Mineral Infrastructure (June, 2014)
- Background Paper 4: Safeguarding Mineral Infrastructure (December, 2014)
- West Sussex Wharves and Railheads Study (February, 2014)
- Summary Report MLP Informal Engagement, July 2014
- West Sussex Joint Minerals Local Plan: Assessment of Need for Aggregates: Local Aggregate Assessment (January, 2017)
- West Sussex Joint Minerals Local Plan: Proposed Submission Draft (Regulation 19) Background Document (January, 2017)
- West Sussex Joint Minerals Local Plan: Have Your Say on the Joint Minerals Local Plan Consultation 2016 Responses (January, 2017)
- West Sussex Joint Minerals Local Plan: Submission - Statement of Consultation (Regulation 22) (May, 2017)

These documents can be found on the West Sussex County Council website (www.westsussex.gov.uk/mwdf).

Strategic Partners

The Aggregate Monitoring 2014 survey provides import/export data for aggregates. The

following authorities were contacted because they export crushed rock to West Sussex:

- Somerset (70-80%);
- Cornwall (1-10%);
Leicestershire (1-10%).

The remaining authorities were not contacted because they export less than 1% of crushed rock to West Sussex:

- Powys;
- Northumberland;
- Shropshire;
- Cambridgeshire;
- South Gloucestershire;
- Devon;
- Dorset;
- Gloucester;
- North Somerset.

Actions

Action: Summary of comments on draft LAA (2015)

Partners: South East Mineral Planning Authorities; South West Aggregate Working Party; London Aggregates Working Party; Coast to Capital LEP; Marine Management Organisation; Crown Estate, Sussex Local Nature Partnership; Natural England.

Outcome: It is envisaged that there will not be a problem in maintaining a supply of crushed rock to West Sussex from Somerset. The East of England Aggregate Working Party (EEAWP) and Somerset look forward to further dialogue and engaging in the MLP process to further consider and understand the potential implications for the south west in supplementing the supply of aggregates.

Date: February 2015

Evidence: A summary of the comments received and how they were taken into account are included in Appendix D (Ref: DtC06)

Action: Letter to authorities with crushed rock resources

Partners: Derbyshire County Council, Somerset County Council, Kent County Council

Outcome: Letters were sent to the three authorities where the majority of the crushed rock is imported from. Derbyshire confirmed that there is currently no reason why exports of crushed rock from Derbyshire to West Sussex will not continue at the current rate for the foreseeable future. Kent County Council also confirmed that crushed rock is in abundance and an increase in demand from West Sussex is unlikely to have a significant impact on the ability for Kent to meet its own needs. No response was received from Somerset County Council.

Date: 18/01/2016

Evidence: A summary of the comments can be found in Appendix D (Refs: DtC20a and DtC20b).

Action: Proposed Submission Draft JMLP Regulation 19 Consultation

Partners: All stakeholders on the WSCC and SDNPA consultation database which includes the relevant strategic partners listed in Appendix C.

Outcome: There were no representations from DtC bodies on this issue.

Date: 16 January 2017 to 13 March 2017.

Evidence: The West Sussex Joint Minerals Local Plan: Submission - Statement of Consultation: Regulation 22 (May, 2017) can be found online at:
www.westsussex.gov.uk/mwdf

Action: Letter to authorities with crushed rock resources (following release of 2014 Aggregate Monitoring Survey data)

Partners: Somerset County Council, Leicestershire County Council and Cornwall County Council

Outcome: Letters were sent to the three authorities which supply the majority of crushed rock to West Sussex.

- Somerset responded confirming that there is a continued provision of a steady and adequate supply of crushed rock which can continue to meet West Sussex's need until 2033;
- Cornwall confirmed that they have a landbank of 140 years;
- Leicestershire confirmed that they have sufficient permitted reserves to last about 30 years, however a significant amount of the reserves are at inactive quarries which are not rail linked. The four quarries which are rail linked had a collective life of 22 years and there is no reason why the continued export of crushed rock from Leicestershire to West Sussex should not be sustained at a similar level until 2033. The Bardon Hill Quarry site (where most of the exports to West Sussex come from) had recently had a new permission to extract a further 132 million tonnes, extending the life of the quarry for a further 40 years.

Date: 24/01/2017

Evidence: A summary of the comments can be found in Appendix D (Refs: DtC21a and DtC21b and DtC21c).

Outcomes from strategic working

Responses from exporting authorities confirmed that there is, and should continue to be, a sufficient supply of crushed rock to meet West Sussex's needs. Further discussions will continue to take place with authorities that export crushed rock to West Sussex.

Submission Stage Summary:

Responses from the three authorities show that there will continue to be a steady and adequate supply of crushed rock which can be exported to West Sussex.

Ongoing cooperation

The preparation of the LAA on an annual basis will help the Authorities to monitor the extent to which the demand for minerals is being met within West Sussex. The Authorities will continue to attend SEEAWP meetings where the supply of aggregates will be discussed and monitored.

Strategic Priority: Supply of clay

A site at West Hoathly is allocated for clay extraction to provide additional supplies of brick clay to the brickworks. The Authorities investigated the availability of alternative supplies of brick clay as part of the exceptional circumstances test as the site would be major development in the AONB. In particular further information was sought from East Sussex County Council to ascertain whether brick clay could be imported from its plan area.

The relevant strategic objectives are:

1: *"to promote the prudent and efficient production and use of minerals, having regard to the market demand and constraints in the Plan area"*;

Evidence base

- Joint West Sussex MJLP, Engagement Event – 8 July 2014: Summary of Outcomes (July 2014)
- Joint West Sussex MJLP, Engagement Event – 13 August 2014: Summary of Outcomes (August 2014)
- Background Paper 1: Spatial Portrait, Version 1 (June 2014)
- Background Paper 1: Spatial Portrait, Version 2 (December, 2014)
- Background Paper 2: Minerals in West Sussex, Version 1 (June, 2014)
- Background Paper 2: Minerals in West Sussex, Version 2 (December, 2014)
- Background Paper 3: Site Identification and Assessment Methodology, Version 1 (June, 2014)
- Background Paper 3: Site Identification and Assessment Methodology, Version 1 (December, 2014)
- Minerals Site Study Engagement Summary: Report Outcomes (January, 2015);
- West Sussex Draft JMLP Regulation 18 (April, 2016)
- West Sussex Joint Minerals Local Plan: Regulation 18 Consultation Report (January, 2017)
- West Sussex Joint Minerals Local Plan: Submission – Statement of Consultation (May, 2017)
- Minerals Site Selection Report (January, 2017)
- Background Document (January, 2017)

These documents can be found on the West Sussex County Council website (www.westsussex.gov.uk/mwdf).

Strategic Partners

- East Sussex County Council

Actions

Action: Correspondence with East Sussex County Council

Partners: East Sussex County Council

Outcome: In relation to supply from Little Standard Hill Farm, there is a condition attached to the planning permission that states that the clay should only be used in connection with the production of bricks at Ashdown Brickworks. If permission was sought to remove the conditions, the operator would need to demonstrate that the reserves were no longer needed in the long-term at Ashdown brickworks and that the proposals were acceptable in terms of other policies. With regard to Ashdown Brickworks, it is estimated that there are sufficient reserves for the next 48 years (information provided with 2003 planning application). Although there isn't anything specific relating to extracted clay not being permitted to be exported from Ashdown brickworks, the East Sussex, South Downs and Brighton and Hove Waste and Minerals Plan (2013) seeks to sustain the manufacture of brick, tile and clay products in the Plan Area. The export of clay to a site outside the Plan area is not likely to be supported if it were to significantly prejudice the future of any of the existing sites in East Sussex by the substantial reduction of clay reserves.

Date: 25 January 2016

Evidence: See Appendix D for a copy of ESCC's email response (Ref: DtC22).

Outcomes from strategic working

Discussions with East Sussex County Council have revealed that there is no certainty that clay could be exported from sites within their plan area.

Ongoing cooperation

The supply of clay will be monitored through the Annual Monitoring Report and discussions with neighbouring MPAs.

Strategic Priority: Supply of marine aggregate

There are two key issues relating to the supply of marine aggregates; the continued supply of marine dredged aggregates and the possibility of soft sand alternatives from the sea bed in the south east.

The relevant strategic objectives are:

1: *"to promote the prudent and efficient production and use of minerals, having regard to the market demand and constraints in the Plan area"*;

Evidence base

- Joint West Sussex MJLP, Engagement Event – 8 July 2014: Summary of Outcomes (July 2014)
- Joint West Sussex MJLP, Engagement Event – 13 August 2014: Summary of Outcomes (August 2014)
- Background Paper 1: Spatial Portrait, Version 1 (June 2014)
- Background Paper 1: Spatial Portrait, Version 2 (December, 2014)
- Background Paper 4: Safeguarding Mineral Infrastructure (June, 2014)
- Background Paper 4: Safeguarding Mineral Infrastructure (December, 2014)
- West Sussex Wharves and Railheads Study (February, 2014)
- West Sussex Joint Minerals Local Plan: Proposed Submission Draft (Regulation 19) Background Document (January, 2017)
- West Sussex Minerals Joint Local Plan –Have Your Say on the Draft Joint Minerals Local Plan Consultation 2016: Outcomes Report (December, 2016)
- West Sussex Joint Minerals Local Plan: Submission - Statement of Consultation (Regulation 22)

These documents can be found on the West Sussex County Council website (www.westsussex.gov.uk/mwdf).

Strategic Partners

- Marine Management Organisation

Actions

Action: Draft JMLP Regulation 18 Consultation

Partners: All stakeholders on the WSCC and SDNPA consultation database which includes the relevant strategic partners listed in Appendix C.

Outcome: No response received from MMO.

Date: 14 April 2016 to 17 June 2016

Evidence: The West Sussex Minerals Joint Local Plan –Have Your Say on the Draft Joint Minerals Local Plan Consultation 2016: Outcomes Report (January, 2017) can be found online at: www.westsussex.gov.uk/mwdf

Action: Correspondence with Marine Management Organisation

Partners: Marine Management Organisation

Outcome: Standard email acknowledgement was received setting out a number of documents that should be referred to in Mineral Local Plans and Local Aggregate Assessments. Reference has been made to these documents. No further response was received.

Date: 23/11/2016

Evidence: Correspondence with the Marine Management Organisation (Ref: DtC23a and b) is in Appendix D.

Action: Proposed Submission Draft JMLP Regulation 19 Consultation

Partners: All stakeholders on the WSCC and SDNPA consultation database which includes the relevant strategic partners listed in Appendix C.

Outcome: There were no representation by DtC bodies on this issue at Regulation 19 stage.

Date: 16 January 2017 to 13 March 2017.

Evidence: Consultation summary can be found online at www.westsussex.gov.uk/mwdf

Action: Proposed Submission Draft JMLP Regulation 19 Consultation

Partners: All stakeholders on the WSCC and SDNPA consultation database which includes the relevant strategic partners listed in Appendix C.

Outcome: No response received from MMO.

Date: 16 January 2017 to 13 March 2017.

Evidence: The West Sussex Joint Minerals Local Plan: Submission - Statement of Consultation: Regulation 22 (May, 2017) can be found online at: www.westsussex.gov.uk/mwdf

Outcomes from strategic working

There was no response received from the Marine Management Organisation, however, the JMLP and LAA refer to the documents set out in the email from the MMO. The West Sussex JMLP Background Document (January, 2017) also includes evidence from other (non DtC bodies) about this issue.

Ongoing cooperation

Ongoing liaison with the MMO as part of the DtC and discussions. Ongoing discussions about Marine Aggregate Supply through SEEAWP and South East Authority meetings. Monitoring through the Local Aggregate Assessment.

Strategic Priority: Safeguarding Mineral Resources and Infrastructure (concrete batching, asphalt plants, oil sites, railheads and recycled aggregate sites)

Minerals and the network of mineral infrastructure (concrete batching, asphalt plants, oil sites, and recycled aggregate sites) are distributed throughout the county. The Authorities may object to non-mineral development that would sterilise safeguarded mineral or prejudice the continued use of minerals infrastructure. DtC discussions have involved speaking with the district and borough councils and adjoining MPAs on the approach taken to safeguarding mineral resources and infrastructure in the MJLP and Mineral Safeguarding Guidance. The safeguarding of the wharves at Shoreham and Littlehampton Harbours are considered under a separate strategic issue in this document.

The relevant strategic objectives are:

1: *"to promote the prudent and efficient production and use of minerals, having regard to the market demand and constraints in the Plan area"*;

5: *"to protect and maintain the existing mineral development sites and infrastructure including capacity for importation of minerals via ports of Littlehampton and Shoreham and the railheads at Chichester, Crawley and Littlehampton"*;

6: *"to safeguard potential economically viable mineral resources from sterilisation"*.

Evidence Base

- Joint West Sussex MJLP, Engagement Event – 8 July 2014: Summary of Outcomes (July 2014)
- Joint West Sussex MJLP, Engagement Event – 13 August 2014: Summary of Outcomes (August 2014)
- British Geological Survey (2007). Mineral Safeguarding Areas and Mineral Consultation Areas in West Sussex
- Historic England (2015). Strategic Stone Study: A Building Stone Atlas of West Sussex (including part of the South Downs National Park)
- Background Paper 1: Spatial Portrait, Version 1 (June 2014)
- Background Paper 1: Spatial Portrait, Version 2 (December, 2014)
- Background Paper 2: Minerals in West Sussex, Version 1 (June, 2014)
- Background Paper 2: Minerals in West Sussex, Version 2 (December, 2014)
- Background Paper 4: Safeguarding Mineral Infrastructure, Version 1 (June, 2014)
- Background Paper 4: Safeguarding Mineral Infrastructure, Version 2 (December, 2014)
- Background Paper 5: Safeguarding Mineral Resources, Version 1 (June, 2014)
- Background Paper 5: Safeguarding Mineral Resources, Version 2 (December, 2014)
- West Sussex Joint Minerals Local Plan: Proposed Submission Draft (Regulation 19) Background Document (January, 2017)
- West Sussex Minerals Joint Local Plan –Have Your Say on the Draft Joint Minerals Local Plan Consultation 2016: Outcomes Report (January, 2017)
- West Sussex Joint Minerals Local Plan: Submission – Statement of Consultation (May, 2017)
- Proposed Submission Draft West Sussex Joint Minerals Local Plan (Regulation 19) Draft

Minerals Safeguarding Guidance (January, 2017)

- West Sussex JMLP the JMLP Minerals Safeguarding Summary of Outcomes Report (May, 2017)

These documents can be found on the West Sussex County Council website (www.westsussex.gov.uk/mwdf).

Strategic Partners

District and Borough Councils in West Sussex:

- Adur District Council
- Arun Borough Council
- Chichester District Council
- Crawley Borough Council
- Horsham District Council
- Mid Sussex District Council
- Worthing Borough Council

Adjoining MPAs:

- Hampshire County Council
- Surrey County Council
- East Sussex County Council
- Brighton and Hove Council

Actions

Action: Targeted engagement with stakeholders on the Background Papers involving two workshops in July and August 2014.

Partners: West Sussex Districts and Borough Councils, South East Mineral Planning Authorities and Statutory Consultees.

Outcome: The outcome of these events informed the preparation of the policies in the plan and a summary of the key points is as follows:

- Prudent to consider safeguarding Folkestone Formation if this is the location of the silica sand resource;
- Important to identify protocol to guide district and borough councils (clear policy, flow chart, guidance document);
- MSA should include reference to prior extraction;
- Support for MC to follow MSA and need for MCA around specific site allocations or active sites (250m?).

Date: 13 August 2014

Evidence: A summary of the outcomes from the workshop can be found on the West Sussex County Council website (www.westsussex.gov.uk/mwdf).

Action: Meeting with Planning Policy Officers Group to discuss the approach to mineral safeguarding in the JMLP, including policies M9 and M10 and the Mineral Safeguarding Guidance.

Partners: West Sussex District and Borough Councils and the Environment Agency.

Outcome: These comments were taken on board by the Authorities when updating the policies within the JMLP and the mineral safeguarding guidance. The meeting highlighted the need to hold a further event to discuss the issue in more detail and with a wider range of stakeholders.

Date: 8 March 2016

Evidence: An extract from the notes of the meeting is provided in Appendix D (Ref: DtC24) and a list of the comments received can be found in West Sussex JMLP the JMLP Minerals Safeguarding Summary of Outcomes Report (January, 2017) which is available at: www.westsussex.gov.uk/mwdf.

Action: Minerals Safeguarding Workshop held at West Sussex County Council to discuss the emerging mineral safeguarding policy and safeguarding guidance.

Partners: West Sussex District and Borough Councils and adjoining MPAs. Although not a strategic partner for the purposes of DtC, there was also representative from the Minerals Industry.

Outcome: These comments were taken on board by the Authorities when updating the policies within the JMLP and the mineral safeguarding guidance. The workshop highlighted a number of key issues which resulted in changes being made to policies within the plan and the Safeguarding Guidance.

Date: 29 June 2016

Evidence: A summary of the event and a list of the comments received can be found in West Sussex JMLP the JMLP Minerals Safeguarding Summary of Outcomes Report (January, 2017) which is available at: www.westsussex.gov.uk/mwdf.

Action: Draft JMLP Regulation 18 Consultation

Partners: All stakeholders on the WSCC and SDNPA consultation database which includes the relevant strategic partners listed in Appendix C.

Outcome: Many of the comments raised were specific to wharves at Shoreham and Littlehampton which are addressed below. Chichester District Council did raise the point that safeguarding in urban areas is not considered appropriate and suggested a size threshold.

Date: 14 April 2016 to 17 June 2016

Evidence: The West Sussex Minerals Joint Local Plan – Have Your Say on the Draft Joint Minerals Local Plan Consultation 2016: Outcomes Report (January, 2017) can be found online at: www.westsussex.gov.uk/mwdf

Action: Proposed Submission Draft JMLP Regulation 19 Consultation

Partners: All stakeholders on the WSCC and SDNPA consultation database which includes the relevant strategic partners listed in Appendix C.

Outcome: Comments raised by DtC bodies on this issue were:

- Horsham District Council - accept in principle the safeguarding area and 250m buffer. Welcome further dialogue to ensure safeguarding implementation is effective.
- Crawley Borough Council - a number of general comments on the safeguarding guidance.

Date: 16 January 2017 to 13 March 2017.

Evidence: The West Sussex Joint Minerals Local Plan: Submission - Statement of Consultation: Regulation 22 (May, 2017) and the West Sussex JMLP the JMLP Minerals Safeguarding Summary of Outcomes Report (May, 2017) can be found online at: www.westsussex.gov.uk/mwdf

Action: Meeting with Planning Policy Officers Group to update them on the latest version of the Minerals Safeguarding Guidance and to invite further comments.

Partners: West Sussex District and Borough Councils and the Environment Agency.

Outcome: The Officers raised some comments and sent their comments to the Authorities as part of the Regulation 19 period of representation.

Date: 8 March 2017

Evidence: An extract from the notes of the meeting is provided in Appendix D (Ref: DtC25) and a list of the comments received can be found in West Sussex JMLP the JMLP Minerals Safeguarding Summary of Outcomes Report (January, 2017) which is available at: www.westsussex.gov.uk/mwdf.

Outcomes from Strategic Working

The engagement workshops held in 2014 highlighted a number of issues which informed the development of the policies in the draft plan and the need to prepare a separate guidance document to clarify how the approach to safeguarding would work in practice. There was support for contiguous Mineral Safeguarding Areas (MSA) and Mineral Consultation Areas

(MCA) boundaries and the Authorities have maintained this approach throughout the plan preparation. Issues such as the extent of buffers around minerals infrastructure and the need to include a threshold were also raised and have been taken into account in the Minerals Safeguarding Guidance.

Following the meeting with PPOG members, a further workshop was held to discuss the details of draft Minerals Safeguarding Guidance. The workshop resulted in a number of changes to the Plan and Guidance:

- Inclusion of a threshold to trigger a consultation for non-mineral development that falls within a MSA with the MPA;
- Inclusion of a section on how mineral safeguarding applies to Local Plan and Neighbourhood Plans;
- Reference to the pre-application process in the Minerals Safeguarding Guidance;
- Buffer around minerals infrastructure has been increase from 100m to 250m;
- Additional detail on how minerals safeguarding applies to building stone;
- Two wharves (New Wharf and Kingston Railway Wharf) have been safeguarded on a temporary basis under Policy M10.

No issues have been raised about the principle of safeguarding individual railheads as a result of the DtC dialogue, engagement and Reg 18 consultation.

Submission Stage Summary

The DtC bodies were generally supportive of the changes that had been made to the Mineral Safeguarding Guidance. No substantive changes were made to the safeguarding policy or the Mineral Safeguarding Guidance following the Regulation 19 period of representation.

Ongoing Cooperation

The District and Borough Councils will be given the MCA as a GIS layer which can be used to identify when the Mineral Planning Authority (MPA) should be consulted on planning applications and local/neighbourhood plan allocations. The MCA and Safeguarding Guidance can be updated when required and re-issued to the district and boroughs to ensure that they have the most up-to-date information. The Planning Policy Officer's Group (PPOG) can be used as a way of identifying any issues and receiving feedback. The Authorities will monitor the success of the safeguarding policies through the Annual Monitoring Report (AMR).

Strategic Priority: Safeguarding Wharves in Shoreham Harbour

There are a number of important wharves located in Shoreham Port used for the importation of aggregates. The safeguarding of wharves within West Sussex is being considered within the context of the regeneration aspirations for Shoreham Harbour through the Shoreham Harbour Joint Area Action Plan (JAAP) which could lead to the redevelopment of wharves on the western arm of the harbour.

The relevant strategic objective is:

5: *"to protect and maintain the existing mineral development sites and infrastructure including capacity for importation of minerals via ports of Littlehampton and Shoreham and the railheads at Chichester, Crawley and Littlehampton";*

Evidence Base

- Background Paper 1: Spatial Portrait, Version 1 (June 2014)
- Background Paper 1: Spatial Portrait, Version 2 (December, 2014)
- Background Paper 4: Safeguarding Mineral Infrastructure, Version 1 (June, 2014)
- Background Paper 4: Safeguarding Mineral Infrastructure, Version 2 (December, 2014)
- West Sussex Wharves and Railheads Study (February, 2014)
- West Sussex Joint Minerals Local Plan: Assessment of Need for Aggregates: Local Aggregate Assessment (January, 2017)
- West Sussex Joint Minerals Local Plan: Proposed Submission Draft (Regulation 19) Background Document (January, 2017)
- Joint West Sussex MJLP, Engagement Event – 8 July 2014: Summary of Outcomes (July 2014)
- Joint West Sussex MJLP, Engagement Event – 13 August 2014: Summary of Outcomes (August 2014)
- West Sussex Joint Minerals Local Plan: Have Your Say on the Joint Minerals Local Plan Consultation 2016 Responses (January, 2017)
- W West Sussex Joint Minerals Local Plan: Submission - Statement of Consultation (Regulation 22) (May, 2017)
- Proposed Submission Draft West Sussex Joint Minerals Local Plan (Regulation 19) Draft Minerals Safeguarding Guidance (January, 2017)

These documents can be found on the West Sussex County Council website (www.westsussex.gov.uk/mwdf).

Strategic Partners

- Adur District Council
- Brighton and Hove City Council
- East Sussex County Council

Actions

Action: Targeted engagement with stakeholders on the Background Papers involving two workshops in July and August 2014.

Partners: West Sussex Districts and Borough Councils, South East Mineral Planning Authorities and Statutory Consultees.

Outcome: The outcome of these events informed the preparation of the policies in the plan but the approach to wharf safeguarding at Shoreham was raised, particularly the need to consider the redevelopment aspirations of the Harbour and that the Port Authority is key to supporting the Joint Area Action Plan whilst ensuring wharf capacity continues to be available.

Date: 13 August 2014

Evidence: A summary of the outcomes from the workshop can be found on the West Sussex County Council website (www.westsussex.gov.uk/mwdf).

Action: Meeting with Shoreham JAAP Policy Sub-Group

Partners: Adur District Council, Brighton and Hove City Council, East Sussex County Council, Environment Agency (NB: Shoreham Port Authority are not a DtC body but are part of the JAAP Policy Sub-Group)

Outcome:

Outcome of Meeting (minutes):

- Confirmation that Wharves and Railheads (W&R) study had been completed and presents five scenarios for the safeguarding of the wharves in the part of the port in West Sussex;
- WSCC drafting a MoU or SCG with the Port Authority, ADC, BHCC and ESCC to be in place before the consultation on the Shoreham JAAP;
- Brighton & Hove and East Sussex are reliant on imports from the harbour. The Waste and Minerals Plan relies on the JAAP to resolve issues of capacity at the harbour;
- Agreed that JAAP should not be used to set Minerals Policy and that should be left to the Minerals Local Plans.

Date: 13 September 2013

Evidence: The minutes of the meeting are included in Appendix D (Ref: DtC26).

Action: Meeting with Shoreham JAAP Policy Sub-Group

Partners: Adur District Council, Brighton and Hove City Council, East Sussex County Council and Environment Agency (NB: Shoreham Port Authority are not a DtC body but are part of the JAAP Policy Sub-Group)

Outcome:

Outcome of Meeting set out in email dated 12th December 2013:

- Confirmation that W&R Study had been completed;
- That the Minerals Local Plan is the vehicle to be used to set the safeguarding policy relevant to the Plan area including Shoreham Port;
- The JAAP was approaching draft stage, with consultation under regulation 18 (due to commence in February 2014). It proposed regeneration on the Western Arm, which would make the continued safeguarding of wharves very difficult, and therefore these business are proposed to be moved to the Eastern Arm;
- WSCC wishes to take a pragmatic and evidenced based approach to safeguarding on the Port, to support the JAAP and to ensure the long-term provision of mineral wharves to serve demand. This will include safeguarding of specific sites on the Eastern Arm and the commitment to the use of general wharf to provide additional capacity, similar to the approach with the adopted Waste and Minerals Local Plan for East Sussex. This will offer both level of certainty and flexibility which will be so important at EiP;
- The partner authorities would work towards the sign off of Statement of Common Ground which will set the direction of travel for planning decisions relating to mineral safeguarding on the Port, in advance of the adoption of the West Sussex Minerals Local Plan and the JAAP. Parties to the Statement were suggested to include Adur, WSCC, ESCC, B&H and Shoreham Port Authority;
- Request for information about the level of demand for minerals brought through Shoreham Port which can then use as a basis for the decision around the level of safeguarding required.

Date: 10th December 2013

Evidence: The minutes of the meeting are included in Appendix D (Ref: DtC27).

Action: Signed Statement of Common Ground

Partners: East Sussex County Council and Brighton and Hove Council (NB: Shoreham Port Authority are not a DtC body but were one of the SoCG parties)

Outcome: Signed SoCG setting out a number of agreements and actions between the parties.

Date: April 2014

Evidence: A copy of the SoCG is in Appendix D (Ref: DtC28)

Action: Draft LAA and approach to safeguarding

Partners: East Sussex County Council, Brighton and Hove Council

Outcome: Sent draft copy of draft LAA showing that there is a surplus of capacity and reasonable alternatives showing that we would allow for anticipated demand to be met (which takes account of ESCC and B&H needs). ESCC email to confirm that they are happy with safeguarding wharf options which meet desired aim.

Date: 30th October 2015

Evidence: A copy of the email is included in Appendix D (Ref: DtC29).

Action: Meeting to discuss approach to safeguarding wharves in Shoreham Harbour

Partners: East Sussex County Council and Brighton and Hove City Council

Outcome:

Update on WSCC Wharves: total expected demand (1.34mtpa), existing operational capacity is 2.27mtpa, Option W3 being pursued leaving a surplus capacity of 0.86mtpa. Littlehampton wharf would not meet ESCC needs but this only serves coated roadstone plant. Discussion about how Britania Wharf (common user terminal) could supply aggregates in the future (to be discussed with the SPA). Potential capacity in eastern arm could be safeguarded in the same way as ESCC/B&H (red line around whole area). B&H and ESCC happy with the approach being taken. SoCG will be updated by end of March.

Date: 8 January 2016

Evidence: The minutes of the meeting are included in Appendix D (Ref: DtC30).

Action: Draft JMLP Regulation 18 Consultation

Partners: All stakeholders on the WSCC and SDNPA consultation database which includes the relevant strategic partners listed in Appendix C.

Outcome: Support has been shown by the local planning authorities that have signed the SoCG on safeguarding wharves at Shoreham Harbour.

Date: 14 April 2016 to 17 June 2016

Evidence: The West Sussex Minerals Joint Local Plan –Have Your Say on the Draft Joint Minerals Local Plan Consultation 2016: Outcomes Report (January, 2017) can be found online at: www.westsussex.gov.uk/mwdf

Action: Signed Statement of Common Ground (updated)

Partners: East Sussex County Council and Brighton and Hove Council (NB: Shoreham Port Authority are not a DtC body but were one of the SoCG parties)

Outcome: Signed SoCG setting out a number of agreements and actions between the parties. The updates included the following:

- Updated LAA data which included a change to the supply and demand information based on Crown Estate landings;
- An update on wharf capacity based on further evidence gathered (Para.5.3);
- Reference to draft policy M10 as set out in the Regulation 18 Plan;
- Proposed policy options considered including the preferred approach.

Date: August 2016

Evidence: A copy of the SoCG is in Appendix D (Ref: DtC31)

Action: Comments from Adur District Council on re-drafting of Policy M10

Partners: Adur District Council

Outcome: Raised concerns about the inclusion of Kingston Railway Wharf and New Wharf as safeguarded sites. Further amendments were made to the policy to address Adur District Council's concerns.

Date: 26 September 2016

Evidence: Correspondence with Adur District Council (Ref: DtC32) In Appendix D.

Action: Proposed Submission Draft JMLP Regulation 19 Consultation

Partners: All stakeholders on the WSCC and SDNPA consultation database which includes the relevant strategic partners listed in Appendix C.

Outcome: Comments raised by DtC bodies on this issue were:

- East Sussex County Council – Supports approach to safeguarding minerals infrastructure in Policy M10. SoCG will underpin effective cooperation and collaboration in addressing strategic cross-boundary issues as they relate to planning for minerals infrastructure in Shoreham Harbour. Identification of the two temporary wharves also supported. Request reference to Joint Area Action Plan for Shoreham Harbour to aid understanding of the approach to safeguarding and the approach to monitoring.

Date: 16 January 2017 to 13 March 2017.

Evidence: The West Sussex Joint Minerals Local Plan: Submission - Statement of Consultation: Regulation 22 (May, 2017) can be found online at:

www.westsussex.gov.uk/mwdf

Outcomes from Strategic Working

Comments received from the partner authorities (during meetings recorded above and subsequent correspondence) were taken on board and incorporated into the final SoCG.

The updated and signed Statement of Common Ground (SoCG) underpins effective cooperation and collaboration between the parties and has the following broad aims:

- to set out the commitment of each of the parties to an approach to mineral safeguarding in line with NPPF at Shoreham Harbour, recognising commercial considerations of the Port and the regeneration aspirations of the JAAP;
- to indicate the approach to be taken by all parties to delivering this commitment.

Submission Stage Update:

The Shoreham Harbour Statement of Common Ground was updated to include the latest LAA data and to set out the proposed policy options and the preferred approach, including reference to draft policy M10 in the Regulation 18 Plan. This was signed off by all the parties.

Following comments received as part of the Regulation 18 consultation on the Draft JMLP (April, 2016), the Authorities re-drafted policy M10 to include two temporary wharves on the western harbour arm (Kingston Railway Wharf and New Wharf). Adur District Council were asked to comment on the draft policy and raised concerns about the inclusion of these two sites in lieu of the regeneration proposals at Shoreham. Further discussions with Adur District Council resulted in some amendments to the policy which addressed their concerns and this was confirmed in an email. There were no representations on soundness or legal compliance grounds from the DtC Bodies at Regulation 19.

Ongoing Cooperation

West Sussex County Council will continue its involvement with the Shoreham Harbour JAAP and ensuring that the safeguarding of wharves is addressed in accordance with policy M10 of the JMLP. The Authorities will monitor the success of the safeguarding policies through the AMR.

Strategic Priority: Safeguarding Railway Wharf at Littlehampton Harbour

Railway Wharf, Littlehampton adjoins a coated roadstone plant owned by Tarmac. Marine sand and gravel imports to the wharf ceased in 2005 and only crushed rock is now imported. There are problems with navigation and silting combined with competing pressures for commercial and recreational uses as Railway Wharf is located within Littlehampton Harbour, part of the Littlehampton Economic Growth Area (LEGA) identified in the Arun Local Plan 2011-2031 Publication Version (Policy HSP1).

The relevant strategic objective is:

5: *"to protect and maintain the existing mineral development sites and infrastructure including capacity for importation of minerals via ports of Littlehampton and Shoreham and the railheads at Chichester, Crawley and Littlehampton".*

Evidence base

- Background Paper 1: Spatial Portrait, Version 1 (June 2014)
- Background Paper 1: Spatial Portrait, Version 2 (December, 2014)
- Background Paper 4: Safeguarding Mineral Infrastructure, Version 1 (June, 2014)
- Background Paper 4: Safeguarding Mineral Infrastructure, Version 2 (December, 2014)
- West Sussex Wharves and Railheads Study (February, 2014)
- West Sussex Joint Minerals Local Plan: Assessment of Need for Aggregates: Local Aggregate Assessment (January, 2017)
- West Sussex Joint Minerals Local Plan: Proposed Submission Draft (Regulation 19) Background Document (January, 2017)
- Joint West Sussex MJLP, Engagement Event – 8 July 2014: Summary of Outcomes (July 2014)
- Joint West Sussex MJLP, Engagement Event – 13 August 2014: Summary of Outcomes (August 2014)
- West Sussex Joint Minerals Local Plan: Have Your Say on the Joint Minerals Local Plan Consultation 2016 Responses (January, 2017)
- W West Sussex Joint Minerals Local Plan: Submission - Statement of Consultation (Regulation 22) (May, 2017)
- Proposed Submission Draft West Sussex Joint Minerals Local Plan (Regulation 19) Draft Minerals Safeguarding Guidance (January, 2017)

These documents can be found on the West Sussex County Council website (www.westsussex.gov.uk/mwdf).

Strategic Partners

- Arun District Council

Actions

Action: Targeted engagement with stakeholders on the Background Papers involving two workshops in July and August 2014.

Partners: West Sussex Districts and Borough Councils, South East Mineral Planning Authorities and Statutory Consultees.

Outcome: The outcome of these events informed the preparation of the policies in the plan. In relation to Littlehampton, the approach to safeguarding in Littlehampton would need to be revisited in light of current evidence. The assumptions of the Wharves and Railheads Study (2014) and the draft interim position statement (2010) must be brought together with NPPF and current marina plans.

Date: 13 August 2014

Evidence: A summary of the outcomes from the workshop can be found on the West Sussex County Council website (www.westsussex.gov.uk/mwdf).

Action: Correspondence with Arun District Council in response to draft Minerals Safeguarding Guidance.

Partners: Arun District Council

Outcome: Query why Littlehampton Wharf is now considered for safeguarding when previously it had not and due to the declining nature of imports. Railway wharf located in the LEGA in the Arun Local Plan 2011-2031 Publication version.

Date: March 2016

Evidence: A copy of the correspondence is included in Appendix D (Ref: DtC33).

Action: Draft JMLP Regulation 18 Consultation

Partners: All stakeholders on the WSCC and SDNPA consultation database which includes the relevant strategic partners listed in Appendix C.

Outcome: Arun District Council commented that there was no justification for safeguarding of Railway Wharf and that it forms part of a proposed Economic Growth Area within the Submission Draft Arun Local Plan (currently in examination) and the supporting text should acknowledge this as it could impact the wharf.

Date: 14 April 2016 to 17 June 2016

Evidence: The West Sussex Minerals Joint Local Plan –Have Your Say on the Draft Joint

Minerals Local Plan Consultation 2016: Outcomes Report (January, 2017) can be found online at: www.westsussex.gov.uk/mwdf

Action: Proposed Submission Draft JMLP Regulation 19 Consultation

Partners: All stakeholders on the WSCC and SDNPA consultation database which includes the relevant strategic partners listed in Appendix C.

Outcome: Following Arun District Council's Response to the Regulation 18 Draft Plan, reference has now been made to the proposed Local Economic Growth Area referred to by Arun District Council.

Date: 16 January 2017 to 13 March 2017.

Evidence: The West Sussex Joint Minerals Local Plan: Submission - Statement of Consultation: Regulation 22 (May, 2017) can be found online at: www.westsussex.gov.uk/mwdf

Outcomes from strategic working

Policy M10 continues to safeguard Railway Wharf, Littlehampton as this approach is compliant with NPPF as the wharf is actively importing crushed rock, albeit in small quantities, to be used at the adjacent coated roadstone plant. Reference has been made in the Reg 19 JMLP to the proposed Local Economic Growth Area referred to by Arun District Council.

Submission Stage Update:

There were no representations from DtC bodies on this issue.

Ongoing cooperation

WSCC will continue to engage with Arun District Council to ensure that the safeguarding of Railway Wharf is addressed in accordance with policy M10 of the JMLP. The Authorities will monitor the success of the safeguarding policies through the AMR.

Strategic Priority: Identification of potential mineral sites

The Authorities undertook a site search and assessment process to identify potential mineral sites to meet the identified need for minerals in the MJLP. The Authorities liaised with district and borough councils with potential sites within their area.

The relevant strategic objectives are:

- 1: *"to promote the prudent and efficient production and use of minerals, having regard to the market demand and constraints in the Plan area"*;
- 3: *to make provision for soft sand to meet the needs of West Sussex from outside the South Downs National Park, where possible: and only make provision for a declining amount of extraction within the SDNP over the plan period"*.

Evidence base

- Joint West Sussex MJLP, Engagement Event – 8 July 2014: Summary of Outcomes (July 2014)
- Joint West Sussex MJLP, Engagement Event – 13 August 2014: Summary of Outcomes (August 2014)
- Background Paper 3: Site Identification and Assessment Methodology, Version 1 (June, 2014)
- Background Paper 3: Site Identification and Assessment Methodology, Version 1 (December, 2014)
- Minerals Sites Study: Version 1 (August, 2014)
- Minerals Site Study: Version 2 (March, 2015)
- West Sussex Joint Minerals Local Plan: Minerals Sites Study Engagement: Report of Outcomes (January, 2017)
- West Sussex Joint Minerals Local Plan: Proposed Submission Draft (Regulation 19) Background Document (January, 2017)
- West Sussex Joint Minerals Local Plan: Have Your Say on the Joint Minerals Local Plan Consultation 2016 Responses (January, 2017)
- W West Sussex Joint Minerals Local Plan: Submission - Statement of Consultation (Regulation 22) (May, 2017)

These documents can be found on the West Sussex County Council website (www.westsussex.gov.uk/mwdf).

Strategic Partners

- Chichester District Council
- Horsham District Council
- Mid Sussex District Council

- Highways England

- Natural England
- Historic England
- Environment Agency
- Local Nature Partnership (LNP);

Actions

Action: Targeted Engagement on Mineral Sites Study

Partners: District and Borough Council, Parish Councils

Outcome: Comments were received from Sussex Wildlife Trust (LNP), Natural England and Chichester District Council which informed the MSS (v2) update and the preparation of the JMLP.

Date: August 2014

Evidence: Consultation summary can be found online at www.westsussex.gov.uk/mwdf

Action: Draft JMLP Regulation 18 Consultation

Partners: All stakeholders on the WSCC and SDNPA consultation database which includes the relevant strategic partners listed in Appendix C.

Outcome: Comments were received on the Ham Farm and West Hoathly site from DtC bodies including Natural England, Environment Agency, Historic England, Horsham District Council and Mid Sussex.

Date: 14 April 2016 to 17 June 2016

Evidence: The West Sussex Minerals Joint Local Plan –Have Your Say on the Draft Joint Minerals Local Plan Consultation 2016: Outcomes Report (January, 2017) can be found online at: www.westsussex.gov.uk/mwdf

Action: Proposed Submission Draft JMLP Regulation 19 Consultation

Partners: All stakeholders on the WSCC and SDNPA consultation database which includes the relevant strategic partners listed in Appendix C.

Outcome: Comments raised by DtC bodies on this issue were:

- East Sussex County Council – no objection to the identification of extension to West Hoathly Brickworks and would like to be consulted on subsequent planning application.
- Natural England – no comments to make.
- Horsham District Council – Comments regarding the potential impact of increased traffic on the road capacity and structure of A283 and the Washington roundabout and

the Storrington AQMA have been addressed.

- Highways England – Ham Farm and West Hoathly sites are sufficiently distanced from the Strategic Road Network and Highways England are satisfied that these are unlikely to have a detrimental effect on the safe and efficient operation of this network.
- Mid Sussex District Council – Extension to West Hoathly Brickworks will have an adverse impact on the landscape which is within the AONB. Concerns were also raised about the suitability of the road network.
- Environment Agency – Supportive of development principles which require a site specific flood risk assessment and hydrogeological assessment.
- Historic England – support reference to need for prior archaeological assessment of Ham Farm and extension to West Hoathly but seek additional detail in policy.

Date: 16 January 2017 to 13 March 2017.

Evidence: The West Sussex Joint Minerals Local Plan: Submission - Statement of Consultation: Regulation 22 (May, 2017) can be found online at:
www.westsussex.gov.uk/mwdf

Outcomes from strategic working

Comments were received from stakeholders and have been taken into account in deciding which sites should be taken forward. Issues raised by have been addressed through the technical studies and in the development principles for each site in Policy M11.

Submission Stage Update:

With the exception of Mid Sussex District Council, comments received from the DtC bodies were supportive of the allocations and the evidence base that supports their allocation. Mid Sussex District Council have concerns about the impact of the West Hoathly allocation on the landscape and the highway network, although they have not said that the plan is unsound or not legally compliant. The evidence base supports the allocation of these sites and shows that these issues have been addressed.

Ongoing cooperation

Whether a site has come forward for minerals development will be monitored through the AMR. The relevant district and borough council will be consulted when a planning application is received for mineral development on a site allocated in the JMLP.

Appendix C: List of Duty to Cooperate Bodies

Section 33A of the Planning and Compulsory Purchase Act 2004 (Local Development) as amended by the Localism Act 2011 sets out the bodies that fall within the scope of the Duty to Co-operate. The DtC applies to all county councils and local planning authorities in England. It also applies to a number of other bodies set out in Part 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The following bodies were engaged as part of the DtC for the West Sussex JMLP.

County, Unitary and National Park Authorities

- East Sussex County Council;
- Brighton and Hove City Council;
- Kent County Council;
- Medway Council;
- Hampshire County Council;
- Isle of Wight Council;
- Surrey County Council;
- Berkshire County Council;
- Oxfordshire County Council;
- Somerset County Council;
- North Somerset Council;
- Devon County Council;
- Dorset County Council;
- Essex County Council;
- Gloucestershire County Council;
- Wiltshire County Council;
- Derbyshire County Council;
- Leicestershire County Council;
- Yorkshire Dales National Part Authority.
- Northumberland County Council;
- Shropshire Council;
- Powys County Council;
- Fife Council
- Cheshire East Council
- Central Bedfordshire Council
- Lancashire County Council
- Hertfordshire County Council
- Nottinghamshire County Council
- North Yorkshire County Council
- North Yorkshire Dales National Park
- Staffordshire County Council
- North Lincolnshire Council
- Highland Council

Local Planning Authorities

- Adur District Council;
- Arun District Council;
- Chichester District Council;
- Crawley Borough Council;
- Horsham District Council;
- Mid Sussex District Council;
- Worthing Borough Council.

Other Prescribed Bodies (Only 'other prescribed bodies' that were relevant to the consideration of the strategic issues were engaged as part of the preparation of the JMLP – see para. 2.17)

- Environment Agency (EA);
- The Historic Buildings and Monuments Commission known as Historic England (HE);
- Natural England (NE);
- The Mayor of London;
- The Homes and Communities Agency;
- Each Primary Care Trust established under section 18 of the National Health Service Act 2006 or continued in existence by virtue of that section;
- Highways Agency (HA) Now known as Highways England;
- Homes and Communities Agency (HCA);
- Civil Aviation Authority (CAA);
- Marine Management Organisation (MMO);
- Office of Rail Regulation (ORR);
- Transport for London;
- Each integrated Transport Authority;
- Local Nature Partnership (LNP);
- Each highway authority within the meaning of section 1 of the Highways Authority Act 1980 (including the Secretary of State, where the Secretary of State is the highways authority);
- Coast to Capital Local Economic Partnership (LEP).

Appendix D: Copies of Key Documents

**DtC01 – Note of Meeting with South East Mineral Planning Authorities
(September, 2013)**

**South East Mineral Planning Authorities Meeting:
Summary of Discussions**

**27 September 2013
RH DHV offices, Westminster**

ATTENDEES

Name	Organisation
Alethea Evans	West Sussex County Council
Darryl Hemmings	West Sussex County Council
Rupy Sandhu	West Sussex County Council
Claire Potts	South Downs National Park Authority
Paul Prowting	Hampshire County Council (representing the Hampshire Mineral Planning Authorities preparing the Hampshire LAA)
David Maxwell	Surrey County Council
Les Andrews	Surrey County Council
Peter Day	Oxfordshire County Council
Tony Cook	East Sussex County Council
Laura Davidson	Milton Keynes Council
John Prosser	Kent County Council
Lester Hannington	Buckinghamshire County Council
Chris Mills	Isle of Wight Council
Rebecca Williams	West Berkshire Council
Catherine Smith	Medway Council

SUMMARY OF DISCUSSIONS

Local Aggregate Assessment Methodology

- The absence of prescriptive guidance means that approaches to consultation on LAAs varies between MPAs.
- Practice in consultation and duty to co-operate engagement on LAAs varies considerably between MPAs.
- The process for approval of LAAs varies between MPAs but most are using the same approach as used for approving the AMR.
- SE MPA's intend to base their apportionment on 10 year sales trend data in line with the MASS guidance. Where data is absent or does not pass the 'common sense check' some MPA's have applied different approaches. Such approaches are well documented within the LAA.

- Milton Keynes intend to use the most recent 3 year sales trend because the 10 year sales trend is skewed by 3 years when there were no sales as no sites were operational, and is as such unrealistically low.
- Oxfordshire have proposed an approach using population as a proxy for aggregate consumption plus an adjustment for change in the balance of exports and imports, because the 10 year sales trend is considered to be unrealistically low.
- East Sussex indicated that their 10 year sales trend is too volatile to provide a reliable basis for forecasting future needs; their LAA will indicate a different approach.
- Buckinghamshire are reviewing the draft LAA circulated earlier in the year, but do not expect to rely upon the figure in the adopted Core Strategy.
- The South East Plan has been revoked, and has therefore the minerals apportionment figures it contained are no longer enforceable in terms of regional planning.
- The figures contained within National and regional guidelines for aggregates provision in England 2005-2020 remain relevant, and therefore the contribution of the regional groupings to the national figures could potentially come under scrutiny during the preparation of LAAs and at Mineral Plan EIP.

Aggregate Working Parties

- The recently published draft National Planning Practice will potentially change the role of the AWP's to take on new responsibilities. The AWP's will need to address their terms of reference and arrangements for providing advice if they are to fulfil this role.
- The Mineral Products Association circulated an LAA checklist following the last SEEAWP meeting for possible use in the preparation of LAAs.
- In order for the AWP to fulfil new responsibilities, there is need for them to monitor LAAs
- In order to fulfil responsibilities indicated within the draft NPPG, the SE MPAs indicated support for SEEAWP terms of reference and processes which are capable of reaching a collective view on LAAs.

Data Issues

- Data confidentiality issues in Berkshire may mean that it is not possible to publish data publically making it difficult to reach a comprehensive region-wide view.
- MPA's to update the LAA annually in AMR's to take account of any new information such as site deliverability which has been established in the previous year.

- Responsibility for collection of mineral data rests with the MPA's but there is little appetite to undertake new data collection to resolve currently acknowledged shortcomings in some areas.
- The collective view is that data for recycled and secondary aggregates is poor because return rates from companies in this sector are low and of poor quality; and surveys of fixed sites only capture part of the aggregate recycling industry. There are some exceptions (e.g. Hampshire) but this requires development of good relationships with the operators and investment of time by the MPA to encourage the operators to submit their data.
- There may be some benefit in looking at how Planning Inspectors are treating issues on aggregate data to ensure MPA's are prepared.

Safeguarding

- Wharves and railheads are generally being safeguarded where they are still in use. Safeguarding of unused canal wharves in Leeds has recently been judged unlawful due to the lack of realistic prospect of their use for mineral development purposes.
- The small number of wharves, nationally, means there is reliance upon those which are viable. Any loss of wharves to non-mineral uses will be a strategic, cross-boundary issue.

Soft sand

- There were opposing views relating to the demand for soft sand, with some attendees stating it is quite parochial, but others commenting that soft sand extracted in other parts of the south east is distributed more widely than either sharp sand and gravel or crushed rock, reflecting its limited occurrence.
- There is potential for supply of soft sand from marine won sources but the extent of this is currently unknown and more research would be needed to demonstrate the extent of this potential resource. This is likely to be a long term issue and therefore currently emerging plans are likely to need to plan on the basis of other sources. This is supported by the South Downs National Park Soft Sand Study.
- There is excess supply of soft sand in Kent (259ktpa exported) and a significant permitted reserve. Current extraction rates at some sites are low because they are owned by smaller operators.
- Kent only has railheads at sharp sand sites so there is no opportunity for sustainable long distance travel of soft sand, future movements will rely on road transport only.

- Where there are supply/demand imbalances between authorities, this could be resolved through joint LAA's which demonstrate that across the area as a whole, demand can be met.

Duty to cooperate

- The most significant issue is import and exports of minerals.
- There were mixed views on the continued relevance of the 6 July 2010 letter from the Chief Planner RE mineral apportionment.
- The National Aggregate Co-ordinating Group is expected to provide a national perspective but will only be able to do this once the AWP's have reported.

Other

- Chalk can sometimes be used as a primary aggregate due to its variable qualities – there is a need to ask operators how it is being used.

DtC02 - SEEAWP Minutes (13 November 2013)

Technical Secretary: C R Waite, 22 Sittingbourne Road, Maidstone, Kent ME14 5LW

: Tel: 01622 764335, e-mail: chriswaiteplanning@blueyonder.co.uk

DRAFT

Minutes of Meeting of SEEAWP held on 13 November 2013

at Eland House, Bressenden Place, London

Present:

John Kilford	Chairman		
Matt Meldrum	West Berks	Mark Worringham	Reading BC
Lester Hannington	Bucks CC	Tony Cook	E Sussex CC
Peter Chadwick	Hants CC	John Prosser	Kent CC
Catherine Smith	Medway	Peter Day	Oxfordshire CC
Paul Sanderson	Surrey CC	Alethea Evans	W Sussex CC
Chris Mills	Isle of Wight	Mark Chant	Milton Keynes
Claire Potts	S Downs NPA	Bob Smith	MPA
Richard Ford	MPA	David Payne	MPA
Mark Russell	BMAPA	Steve Cole	BAA
Eamon Mythen	DCLG	Chris Waite	Technical Secretary

1 Welcome & Apologies

- 1.1 The Chairman welcomed Mark Worringham, Alethea Evans and Lester Hannington to their first SEEAWP meeting. Apologies were received from Stewart Mitchell and Ken Hobden (MPA), James Trimmer (PLA), Nick Everington (The Crown Estate), Mark Plummer (DCLG) and Sue Marsh (Eof E AWP).

2 Minutes and Matters Arising from 3 July 2013 meeting

- 2.1 Matters raised, other than those to be dealt with under an agenda item, were as follows:

2.5 The reserves data had not yet been received. Nick Everington had informed the Secretary that its production was imminent and had offered some of the data in advance. The Secretary replied that it was best for SEEAWP to receive all the data together.

2.6 BGS resource survey reports and maps are now on the Crown Estate website

3.1 PD said that minute 3.1 read as though SEEAWP members could only raise issues on the minutes in exceptional circumstances. The Chairman replied that he had not meant to suggest any restriction for amendments which would correct serious inaccuracies or factual

errors, but he sought to avoid minor text changes that would not significantly alter the substance of what had been minuted. Any proposal for an amendment should normally await the next meeting, unless harm or consequent mistakes might otherwise occur.

It was agreed that the minutes should be publicly available, and to that end, as DCLG had decided not to include them on their web, MPAs were asked to place them on their web sites. To avoid misunderstandings, the Secretary would clearly put Draft on minutes before they were cleared at the following SEEAWP meeting.

4.3 The last collated returns for AM2012 were received by the Secretary on 30 October.

4.4 No advance had been made on the definition of silica sand. The Chairman asked for the authorities with silica sand resources to draw up a definition. Raising the issue of AWP's collecting data on non energy minerals awaits an AWP Secretaries and NCG meeting. AWP Secretaries meeting had been set for 19 December.

5.3 & 5.5 The responses received on Oxfordshire and Surrey draft LAAs had been sent to the authorities.

5.6 The secretary had issued the checklist drawn up by DP.

5.8 SEEAWP views on Somerset draft LAA had been sent.

6.1 At the request of CM it was agreed to overcome an omission in the minutes in regard to the report by Mark Plummer by adding a further point:

- there is an update to Schedule 14 of the 1995 Environment Act separate from the Lord Taylor revised guidelines

7.4 The question of terms of reference (ToR) for AWP Chairmen awaits an NCG meeting for which there is currently no date. SEEAWP felt that a ToR was desirable, and the Chairman agreed that he would welcome it, as presently there is no guidance on a Chairman's role. It was proposed that AWP Secretaries should also have ToR drawn up. The Secretary responded that he felt a ToR would be unlikely to add to the specification for Secretaries in the current contract. The specification is sufficiently detailed, but he would raise the proposal at the AWP Secretaries forthcoming meeting.

3 Local Aggregates Assessments

LAA Checklist

- 3.1 To assist the AWP in giving views on MPA LAAs a checklist had been issued with the papers. LH approved of the five sub headings, but considered that the rest of the checklist went into too much detail and beyond the NPPF and NPPG requirements. A 'checklist' suggested a tick box for all of the lines in the paper. The Chairman pointed out that the checklist was designed as an aid to the AWP and was not prescriptive. However, LH remained concerned if the checklist was adopted as the basis for the AWP response to an LAA, and then publicly available at a Local Plan hearing.
- 3.2 PD said that the POS/mpa were seeking to draw up an LAA guide for AWP's, and the checklist might be considered as part of that. He would feed back on this to the Secretary. The checklist was not adopted by SEEAWP, but, pending its replacement by other guidance, it would provide something of an informal 'aide memoire'.

Procedure and Timetable

- 3.3 SEEAWP considered that it should give a response to each draft LAA that it received, separate from the minutes. The Secretary asked SEEAWP to be clear in the views it wished to send to each MPA.
- 3.4 CM had asked for SEEAWP to recommend a timetable for MPAs to submit their LAAs to the AWP. The MPAs said that although it is recommended that the LAA is included in an authority's annual monitoring report, there is no specific timetable for the report. MPAs wished to have the annual survey data as soon as possible each year in order to update the LAA. However, SEEAWP saw no problem in the AWP annual report (which is to be submitted to DCLG by the end of June each year) using region wide LAA totals which would be based on data some 16 months old.

LAAs in the South East

- 3.5 The Chairman congratulated the MPAs on all preparing a draft LAA by this meeting, or in the case of the 5 Berkshire authorities, having commissioned a report for the whole of Berkshire. The Secretary said that he had passed on the views on the draft LAAs received from individual SEEAWP members to the appropriate MPAs.

Milton Keynes draft LAA

- 3.6 MC said that the draft LAA came to no conclusion between the four options for land-won sand and gravel. As there were no active workings for a number of years it was inappropriate to use the 10 year sales average for land-won sand and gravel. The three year figure of 0.17mtpa was more appropriate. In response to the Chairman he confirmed that although there was an issue of a site straddling the boundary between Milton Keynes (MK) and Northamptonshire, there was no concern from East Midlands AWP with the MK approach.
- 3.7 BS on behalf of industry said that MK had a considerable consumer base and that an assessment of population growth and housing would be a better measure than the sales average of the last 5 years. He considered that this would justify a figure of 0.2mtpa or more. MC said that there had been a disappointing response to the call for sites even though there were workable resources.
- 3.8 SEEAWP asked for a response to be sent supporting the rejection of the 10 year sales average for land-won sand and gravel working. Some support was given to the 3 year figure of 0.17mtpa, but MK were asked to undertake an assessment of future population, housing completions and infrastructure which might well justify a figure of 0.2mtpa or more.

West Berks LAA

- 3.9 MM explained the problems of obtaining data to prepare an LAA for West Berkshire. He acknowledged that this was a long draft LAA as it was principally prepared as an initial step for an Issues and Options document for a Local Plan. He had been able to establish that the 10 year sales average for land-won sand and gravel was some 439,000 tonnes, and the LAA proposed that this was the figure for which provision should be made. The landbank had declined to just over 7 years and needs to be made up if to be maintained. Rail imports of hard rock are a significant supply, but the tonnages are largely exported to other authorities. The figures for secondary and recycled aggregate are particularly significant to supply for West Berkshire as these now exceed land-won sales.
- 3.10 The Chairman questioned West Berkshire relationship with the other Berkshire authorities. MM said that West Berkshire had supplied its data to them and supported the proposal for

an LAA to be prepared for the whole of Berkshire – see below. However, West Berkshire would be likely to pursue its own LAA in parallel in future years.

- 3.11 SEEAWP complemented the preparation of a draft LAA despite the data constraints and supported the provision of land-won sand and gravel at the 10 year sales average which gives headroom for growth in the economy.

5 Berkshire Unitary Authorities

- 3.12 RW had issued a paper confirming that the authorities (5BUAs) had commissioned consultants to prepare an LAA that would encompass the whole of Berkshire, ie incorporating data from West Berkshire. The 2012 findings were set out for all Berkshire, including sales and reserves of land-won sand and gravel, aggregate sales at rail depots, and sales of C&D aggregates and capacity of C&D recycling sites. The 10 year sales average for land-won sand and gravel was 878,000. This is proposed to be adopted for future provision.
- 3.13 SEEAWP welcomed the proposal to complete the coverage of LAAs for the South East and for it to cover the whole of Berkshire. SEEAWP supported the provision of the 10 year sales average for land-won sand and gravel.

Buckinghamshire LAA

- 3.14 LH said that the views received on the earlier draft LAA at the last SEEAWP meeting had been taken on board. The LAA concluded that the 10 year sales average of 0.96mtpa should be adopted, rather than the figure of 1.09 in the Core Strategy. It is intended to start a Minerals and Waste Plan next year.
- 3.15 RF confirmed that the views of Bretts had been addressed. SEEAWP supported the provision for land-won sand and gravel at the 10 year sales average of 0.96mtpa.

West Sussex LAA

- 3.16 AE introduced the draft LAA which included part of the South Downs NPA area. The LAA proposed to adopt the 10 year sales average of 0.5mtpa for land-won sand and gravel. This was the combined soft sand/sharp sand and gravel total. A split had not been made whilst awaiting the outcome of the combined Hampshire, East Sussex, West Sussex, South Downs NPA study of soft sand. SC cautioned that although on BGS survey data there appeared to be soft sand resources outside the National Park, it should not be presumed that this area would yield viable reserves. Detailed investigation would be needed and in his experience much will be discarded as non viable. This could lead to an overall shortfall of soft sand supplies as the reserves in the National Park become depleted.
- 3.17 Industry welcomed the helpful summary at each section, and the LAA gave good direction to industry on sites. SEEAWP supported the proposed provision of land won sand and gravel at the 10 year sales average of 0.5mtpa, but considered that a separate provision within this for soft sand was desirable.

Hampshire LAA

- 3.18 PS said that the revised LAA used the Adopted Plan figure of 1.56mtpa for land-won sand and gravel sales. This is higher than the 10 year sales average giving flexibility for economic growth. The landbank is in excess of 7 years.
- 3.19 SEEAWP supported the LAA which proposed that provision should be made for 1.56mtpa for land-won sand and gravel sales.

East Sussex LAA

- 3.20 TC introduced the draft LAA which was also for Brighton and Hove City Council and part of the South Downs NPA area. He handed out an addendum which amended the consumption data in the LAA. The LAA uses the Adopted Plan figure of 0.1mtpa for land-won sand and gravel. There is an adequate landbank at the present time. Care has been taken to account for the sales from the major site that straddles the E Sussex and Kent boundary. Natural England is content with the LAA.
- 3.21 SEEAWP supported the provision to be made for land-won sand and gravel at 0.1mtpa

Medway Towns LAA

- 3.22 CS said that there had been no land-won sand and gravel sales for a number of years and that using a 10 year sales average would be inappropriate. Medway had one sand and gravel site with planning permission for 1.2Mt of aggregate, but it had not been started. It is proposed to use the draft Core Strategy figure of 0.18mtpa. This would give a 6-7 year landbank from the permitted site. CS said that obtaining figures for secondary and recycled aggregates was a problem.
- 3.23 SEEAWP supported the provision to be made for land-won sand and gravel at 0.18mtpa.

Oxfordshire LAA

- 3.24 PD said that Oxfordshire had received criticism of the draft LAA suggesting a figure of 1.2mtpa for land-won sand and gravel. Objectors draw attention to the NPPF asking authorities to plan for an annual LAA based on a rolling average of 10 years sales data, and saw no reason why Oxfordshire should deviate from this. They questioned whether the methodology used in arriving at 1.2mtpa was robust enough to justify the figure. The 10 year average is 1.0mtpa whereas the 2012 sales in Oxfordshire were 0.7Mt. The 10 year average would therefore provide headroom for growth. What were the AWP's views on Oxfordshire adopting the 10 year average figure?
- 3.25 DP said that the temporary mothballing of three aggregate sites accounted for the low sales in recent years. Having adopted a local methodology devised by independent consultants, this was about to be dropped due to local pressures. BS said that the draft LAA submitted to SEEAWP gave the technical justification for the 1.2mtpa figure. No further data had been supplied to show the logic was flawed or to discount this finding.
- 3.26 JP said that he had attempted to use the methodology adopted by Oxfordshire's consultants in revising the Kent LAA. He had found it most unsatisfactory, utilising national population consumption figures from the 2009 national survey applied to the MPA area. He had changed his mind since the previous consideration of the draft LAA and supported using the 10 year provision. This gained support from some other MPA members.
- 3.27 The Chairman sought to find a response that would encompass the views of SEEAWP. However, it was pointed out that Oxfordshire had not consulted on a further draft LAA revision to explain the current thinking. As no such draft had been submitted to the AWP for it to consider, SEEAWP decided that it could not give a written response.

Matters arising from LAAs

- 3.28 A number of MPAs are having difficulty in obtaining reliable and comprehensive data on secondary and recycled aggregate. The Chairman asked members to continue pursuing data, despite the difficulties, as this source is clearly a major contributor to aggregate supply.

- 3.29 It appeared that consultation with mpa may have been regarded by some MPAs as having consulted the industry. MPAs are reminded to also consult BAA.

LAAAs from MPAs in adjoining AWPAs

- 3.30 The Secretary reported that the First Review of the Technical Statement for Wales recommended apportionments for authorities in Wales at the ten year sales average. This will enable the limited amount of crushed rock exported to the South East from Wales to continue.

4 Marine Aggregates

- 4.1 SEEAWP 13/09 reported that the SEEAWP response to the MMO East Coast Plans had been sent on 5 October. The MMO will consider all the responses and expect to submit the Plans to the Secretary of State in Spring 2014.
- 4.2 A workshop on the South Coast Plans had been attended by MR and the Secretary in October. This enabled views to be given at this stage in the preparation of the plans.
- 4.3 The BGS report on marine aggregate resources had been completed and is now on The Crown Estate website. However, the reserves data from The Crown Estate is still awaited.

5 New National Planning Guidance and Update by DCLG

- 5.1 EM updated the meeting on:

- NPPG: the large number of responses were being assessed; he could not give a date when the guidance would be re-launched.
- EU EIA Directive: the UK is seeking reforms to avoid additional burdens on the planning system
- Onshore Oil & Gas: guidance was issued in July 2013 and secondary legislation is under consideration
- Red Tape Challenge: the reduction in regulations will be a benefit to plan making and industry applying for planning permission.
- National Aggregate Survey for 2013: the funding was in place but could not be accessed until 1 April 2014. However, in response to a question, EM thought that it might be possible to go out to tender, appoint, and prepare for the survey before 1 April 2014. SEEAWP urged that this should be done if at all possible so that the survey proper could start in April.

- 5.2 SEEAWP were dismayed at the delay in starting the 2013 survey as this provides the information on imports and exports and enables a better fix on consumption in an MPA's area. It was suggested that SEEAWP should perhaps undertake a limited survey of sand and gravel sales and reserves at the beginning of 2013 in order to assist LAA updates. However, this would mean cooperation by operators with two surveys, and before such action was taken SEEAWP should know the wider views of industry and other AWPAs. The Chairman said that any discussion on pursuing this at the AWP Secretaries meeting required a proposition. It was agreed that PD, LH, BS and SC would take this up outside the meeting and have a proposition prepared and submitted to the Secretary by 12 December in order that it could be circulated in advance of the AWP Secretaries meeting.

- 5.3 EM said that Mark Plummer apologised for not being able to attend the meeting, but he had a meeting with the Minister. The Department had a heavy workload but if SEEAWP members had a particular query, EM would seek to ensure that a reply was given. He noted SEEAWP's view that an NCG meeting in early 2014 would enable a number of matters to be discussed at the national level, and would convey this to Mark Plummer.

6 AM2012 Draft Report

- 6.1 The Secretary summarised the key figures and recommendation in the draft AM2012 report:
- land-won sales of sand and gravel and rail imports had declined, but in contrast marine dredged aggregate landings had increased for the second year running.
 - reserves of both sand and gravel and rock had declined, but there was some 12.5Mt of sand and gravel in undetermined applications, and a 16.2Mt ragstone quarry extension had been permitted in 2013.
 - 2.5Mt of CD&EW was recorded as recycled at fixed sites, but coverage was incomplete
 - all SE MPAs had submitted a draft LAA except for 5 Berkshire Unitary Authorities, but they have commissioned a joint LAA for the whole of Berkshire
 - the combined LAAs proposed provision of 8.65mtpa of land-won sand and gravel at the regional level, and 1.25mtpa of crushed rock. Such provision would be in excess of the 10 year sales average for sand and gravel (7.8Mt) and match the 10 year sales average for crushed rock
 - on this basis it was proposed that SEEAWP advised NCG that the region is proposing to make a full contribution to both national and local needs.
- 6.2 Table 4 in the draft report was the key table leading to the above recommendation. In previous years this table had compared the MPA and AWP reserves and landbanks against the guideline apportionments. The 2012 Table 4 substituted figures from MPAs' LAAs, indicating if the figure was derived from an adopted local plan, a ten year sales average, or a different figure to the 10 year sales average. With the note from Berkshire setting a 0.88mtpa figure, the total for the region added up to 8.65mtpa. At this rate reserves of over 80mt would last for some 9.6 years.
- 6.3 The Secretary said that as he had received the last survey data on 30 October the report had been written hurriedly in order to issue it for the meeting. He asked for it to be checked for accuracy, and that confidentiality had been protected. He drew attention to specific sections of the report for MPAs to check:
- para 3.7 and a footnote to Table 1: Berks and Bucks re dormant sites
 - para 9.1: all MPAs re adopted plans
 - Table 1 footnote: Kent and Surrey re non aggregate use, and
E Sussex re workings not likely to be worked before 2014
 - Appendix B: updates with revised wording or confirmation of no change was required from Bracknell Forest, Reading, Slough, and Windsor & Maidenhead
- 6.4 The Secretary noted changes given at the meeting to Table 4 (which would require changes to the text of AM2012) and would delete Novington Pit under E Sussex in Appendix C. He would also have to amend Table 4 and associated text if Oxfordshire decided on provision

of a land-won sand and gravel figure at 1.0mtpa. The total proposed for the South East would then be 8.45mtpa, but the conclusion regarding making a full contribution to local and national needs would remain unchanged. The Secretary was grateful for the offer from AE to provide diagrams to illustrate the Tables in the report.

- 6.5 DP pointed out that although the reserves in the region amounted to a sand and gravel landbank of over 9Mt, this could mask a significant shortfall in soft sand reserves. It was agreed that reference to this would be made in the AM2012 text.
- 6.6 It was agreed that any changes recommended to the draft report and updating from para 6.3 above should be sent to the Secretary by 22 November. PD was given to 26 November to advise the Secretary whether Oxfordshire proposed a figure of 1.0mtpa for provision for land-won sand and gravel. The Chairman and Secretary then be authorised to finalise the AM2012 report, including diagrams, to issue it, and ask for it to be placed on the DCLG and MPA websites.

7 Any Other Business

- 7.1 There was no other business.

8 Date of Next Meeting

- 8.1 The next SEEAWP meeting is to take place **at 2pm on Wednesday 12 March 2014** at DCLG Offices, Eland House, Bressenden Place, London, SW1E 5DU.

DtC03a – SEEAWP Minutes (9 July, 2014)

Technical Secretary: C R Waite, 22 Sittingbourne Road, Maidstone, Kent ME14 5LW

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DRAFT

Minutes of Meeting of SEEAWP held on 9 July 2014

at Eland House, Bressenden Place, London

Present:

John Kilford	Chairman		
Andrew Morrow	West Berks	Graham Ritchie	Wokingham BC
Lester Hannington	Bucks CC	Tony Cook	E Sussex CC
Peter Chadwick	Hants CC	Brian Geeke	Kent CC
Catherine Smith	Medway	Peter Day	Oxfordshire CC
Paul Sanderson	Surrey CC	Alethea Evans	W Sussex CC
Chris Mills	Isle of Wight	Laura Burton	Milton Keynes
Claire Potts	S Downs NPA	Bob Smith	MPA
Richard Ford	MPA	Stewart Mitchell	MPA
Simon Treacy	MPA	David Payne	MPA
Mark Russell	BMAPA	Nick Everington	The Crown Estate
Nat Percival	MMO	Phil McBryde	MMO
Eamon Mythen	DCLG	Sue Marsh	EoE AWP
Ewan Coke	LAWP	Chris Waite	Technical Secretary

1 Welcome & Apologies

- 1.1 The Chairman welcomed Sue Marsh and Ewan Coke to the meeting which would start with a presentation by Nat Percival to which London AWP representatives had been invited. He also thanked The Crown Estate for kindly providing the venue and hospitality. Apologies were received from Mark Chant (Milton Keynes), John Prosser (Kent CC), Ken Hobden (MPA), James Trimmer (PLA), Nick Tennant (DCLG) and Brianne Stolper (LB Hillingdon).

2 Marine Management Organisation (MMO) Presentation

- 2.1 Nat Percival spoke to a presentation on the implications of section 58 of the Marine and Coastal Access Act 2009, the MMO's current approach to implementation and monitoring, and steps to engage external decision makers. Most of the presentation was on the East Coast Plans. The South Coast Plans are at an early stage with workshops in July to focus on

the draft Vision and Objectives for those Plans. Comments on the document are invited by 31 July: <https://www.connect.marinemanagement.org.uk/consultations/south-vision-and-objectives>

2.2 In response to questions NP said:

- 'exceptional circumstances' in the aggregate policies reflected that government priorities, perhaps for oil & gas exploration, might override the aggregate activities.

- local authorities should consult the MMO if a wharf that imported aggregates was threatened with closure from redevelopment; this applied whether the wharf adjoined the sea area supplying the aggregate or not. The MMO would respond to the consultation.

- the East Coast Plan areas have extensive energy related interests; the South Coast sea areas include more diverse activities, including more social and leisure interests. However, the principles are the same and he recognised that industry is seeking a consistency of approach for aggregates throughout the sea areas.

- it is recognised that there are significant gaps in the evidence base in the South Coast Plan areas. The MMO is seeking to close these gaps, and has targeted priorities.

2.3 The Chairman thanked NP for the presentation and commended the MMO in successfully gaining the Secretary of State's approval of the East Coast Plans in such a short time. NP agreed to provide a copy of the presentation to be issued with the minutes of the meeting.

3 Minutes and Matters Arising from 13 November 2013 meeting

3.1 Matters raised, other than those to be dealt with under an agenda item, were as follows:

2.1 3.1 The Secretary would put Draft on the minutes until they were cleared, and MPA's would only put them on their web sites when they were cleared.

4.4 & 7.4 No National Coordinating Group (NCG) meeting had been held at which the issues of non energy minerals included in the Annual Monitoring (AM) surveys, and Terms of Reference for AWP Chairmen and Secretaries could be raised. EM said it was the intention to hold an AWP Secretaries meeting in September, to be followed by an NCG meeting in November.

6.1 The draft minute had been amended. The Chairman asked EM to pass on SEEAWP's best wishes for Mark Plummer in his new role with DCLG in housing.

3.6-3.23 The responses to 7 Local Aggregate Assessments (LAAs) were sent and circulated.

6.6 The Annual Monitoring Report for 2012 was finalised, issued and placed on the DCLG website.

4 Marine Aggregates

4.1 SEEAWP 14/02 reported on The Crown Estate's publication Marine Aggregates – Capability & Portfolio 2013. This sets out the tonnage of current primary aggregate reserves in each of the seven sea regions, the 10 year and 3 year average annual offtake, and compares this with the annual permitted offtake. The Secretary drew attention to figures of significance to the South East, including that at the average offtake in the last 3 years, reserves would last for some 13 years. He considered that the particular merit of the publication is that for the first time it provides a perspective on marine aggregates comparable to land based data. It is intended to be produced annually and MPAs can draw on it in their section on marine aggregate supply in their LAAs.

- 4.2 NE said that he would welcome feedback on the document and confirmed that it would be produced annually. There had been a number of licences granted in 2013, so the figures for that year would show an increased level of reserves. A number of those at the meeting had not seen the document; NE would provide the link to access it on the website, and those that had not received a copy should advise NE so he could ensure a full distribution of future documents.

<http://www.thecrownstate.co.uk/energy-and-infrastructure/aggregates/>

5 **AM2013 Draft Report**

- 5.1 The Secretary introduced the AM2013 draft report which had been circulated. He thanked industry and MPAs for making the necessary returns, and AE for her assistance with the figures. The report still needed tidying in terms of pagination, page headings etc. The Secretary said that he had identified some errors that needed amending, and had received some corrections from East Sussex to paragraphs 4.4, 9.1 and the tables and appendices. These identified the two areas in which the Secretary particularly asked SEEAWP to review. Would any of the data in the Tables reveal a confidential figure? Were the paragraphs on Local Plans and LAAs accurate?
- 5.2 A number of changes were proposed to the draft:
- TC and CP would forward corrections to the appendices on sites in E Sussex or SDNPA.
- SM asked for paragraph 3.4 to be amended as sales had been stable over the last 5 years
- The Chairman asked for the footnote to Table 7 to be deleted as it was superfluous
- DP said that LAAs do not propose figures – this was for Local Plans. PC agreed, paragraph 9.2 should be amended..
- PC, AE and others said that Core Strategies should no longer be referred to. AE offered to draft a revision to paragraph 9.1
- CP asked for paragraph 8.1 to state whether the figures related to active or both active and inactive quarries
- TC asked for ‘except East Sussex’ to be deleted from the second sentence in paragraph 9.3
- 5.3 It was agreed that subject to these changes, and any further amendments sent to the Secretary by 25 July, the Chairman and Secretary be authorised to finalise AM2013, including figures to support the tables, issue it, and ask for DCLG and MPAs to place it on their websites.

6 **DCLG Update**

- 6.1 Eamon Mythen reported that DCLG minerals and waste team now had a full staff complement, with Nick Tennant now team leader, and would move to former Home Office accommodation in Marsham St in July & August. He hoped any service disruption would be minimal. There had been no recent Ministerial changes.
- DCLG’s website had been updated to include all AWP Secretary contacts and 2012 monitoring reports (except for the West Midlands which is producing the 2011 & 2012 reports together), and will include 2013 reports when they are all available

Annual Minerals Raised Inquiry: clearance had been obtained for ONS to undertake the 2014 survey. A request to proceed was now before Nick Boles

National 4 Yearly Aggregate Minerals Survey: a number of internal hurdles had been cleared and a bid was to be made to Nick Boles for permission to seek tenders. This would be for the 2013 calendar year in order to maintain continuity in the 4 yearly data series required by industry, planners and AWP's in analysing and interpreting data. To avoid confusion DCLG agreed to term this AM13 in line with past practice and not AM14.

Planning Guidance (NPPG) issued on line 6 March, would have a number of additions relevant to minerals planning - on peat; underground coal gasification; and underground storage of natural gas. New planning policy on waste management would also be issued, replacing PPS10. Timing: summer 2014.

Permitted Development Rights a consultation in the summer would include proposed retail use class changes, greater flexibility for changes to residential use, some exemptions for waste management site operational facilities and minor developments in support of businesses. Minerals would not be directly affected.

Onshore Oil & Gas: DCLG had delivered the planning component of the wider regulatory framework. DECC was now consulting on its proposals (announced on 23 May, consultation closing on 12 August) to simplify underground access for shale gas and deep geothermal operations. Local people would receive notification, but property owners or tenants would not have to be consulted on or give permission for operations below 300m under their land. Provision would be made for a voluntary payment of £20,000 per lateral well to the local community. Implementation would be through the Infrastructure Bill.

Public Health England had published a report on public health impacts of exposure to chemical and radioactive pollutants as a result of shale gas extraction. (NB: the naturally occurring radioactive aspects are common to all oil and gas drilling, not unique to shale gas).

Infrastructure Bill would transform the Highways Agency into a government owned company and simplify the procedures for nationally significant infrastructure.

BIS Select Committee, Extractive Industries Sector: the Minister had asked why government does not have a minerals strategy.

DfT was allocating £168 million for pothole prevention & repair across England.

Brownfield land: to bring forward development a £5million fund was to be launched to support LDOs with a target of putting 90% of sites suitable for housing into production by 2020. In addition, £400million was to be spent on promoting 20 new housing zones in London, and £200million on 10 zones outside London.

Revised EIA Directive: the text had been published in the Official Journal on 25 April, dropping proposals for extending its application. No decisions had been made yet on how the Directive would be transposed by the due date May 2017.

Hampshire CC Oil & Gas Information Day some 200 delegates attended this very informative event in Winchester. The purpose was to explain to those attending what exploration and extraction would actually entail before any proposals were submitted. Professor Sanderson from Southampton University had been particularly helpful in presenting facts about hydraulic fracturing, demystifying misconceptions. EM felt that the day had raised three key issues

- the need for more factual information to counter misinformation
- armed with bad examples of poor regulatory practice in the USA, public cynicism that the government's regulatory framework would be effective and protect communities
- clarification of the scale of activities and cumulative impacts eg could the 3 current sites in Hampshire become 10 or 100?

The Chairman asked if there would be a note of the day's proceedings. PC said that Hants CC were preparing a report He would send the web link for the Secretary to circulate.

A summary report has now been published on the County Council website:
<http://www3.hants.gov.uk/minerals/oil-gas-development.htm>

Quadrilla had submitted the first planning applications for an exploration site and a series of associated monitoring stations in south Lancashire. If permission was granted it proposed to drill, hydraulically fracture and test flow of gas from up to four exploratory wells and monitor before and after operations

7 Local Aggregate Assessments (LAAs)

- 7.1 SEEAWP 14/03 proposed that the Autumn SEEAWP meeting should focus on LAAs updated with the AM2013 figures once the report was finalised and issued. This was agreed, with updated LAAs to be submitted to SEEAWP no later than 2 weeks before the meeting in order that they could be circulated in advance. The Chairman asked that wherever possible LAAs should be submitted earlier than this. SEEAWP agreed this would avoid members suddenly receiving up to 11 LAAs all at once.
- 7.2 LH questioned whether this was practical as his authority had taken six months to agree the draft LAA. PD said that the timetable for internal signing off by an authority was a separate matter - the submissions to SEEAWP should be made as agreed.
- 7.3 PS said that it was difficult to get to the essence of an LAA without reading it all. He asked that LAAs should contain an executive summary of no more than an A4 page. This was strongly supported by SEEAWP. BS suggested that if the LAA update was essentially the same format as the previous LAA, but just updating the figures, track changes in the updated version would be most helpful.
- 7.4 In response to the Chairman SM said that the East of England AWP invited each authority to introduce the LAA at its meetings. The Chairman felt that with 11 LAAs that would be likely to lead to too long a SEEAWP meeting. SEEAWP agreed that it would be content with an LAA summary of A4 length or less.
- 7.5 The checklist for LAAs, which SEEAWP had not adopted, but agreed would provide something of an 'aide memoire' was reported to this meeting at the request of Lester Harrington. LH said he maintained concerns that it could lead to SEEAWP criticising a draft Bucks LAA by asking for more than was required. SEEAWP did not share this view and considered that the checklist was useful. TC reported that the POS/mpa guide is in its final draft form. He intends to carry out consultations on this and provide a copy for next SEEAWP meeting.

8 Any Other Business

Silica Sand

- 8.1 At the last meeting the Chairman asked MPAs with silica sand resources to draw up a definition. SEEAWP 14/04 set out two definitions, one long, one short. PS and SM pointed out that the long definition in SEEAWP 14/04 was almost word for word the definition in the BGS Fact Sheet – but not quite. Although the short definition was useful, the meeting preferred to stick to the BGS definition in its Mineral Planning Fact Sheet. For clarity, this is:
“Silica (industrial) sands contain a high proportion of silica (normally more than 95% SiO₂) and are used for applications other than as construction aggregates. They are produced from both loosely consolidated sand deposits and by crushing weakly cemented sandstones.

Unlike construction sands, which are used for their physical properties alone, silica sands are valued for a combination of chemical and physical properties. These include a high silica content in the form of quartz and, more importantly, very low levels of deleterious impurities, particularly clay, iron oxides and refractory minerals, such as chromite. They typically have a narrow grain size distribution (generally in the range 0.5 to 0.1mm).

For most applications, silica sands have to conform to very closely defined specifications, and consistency in quality is of critical importance. Particular uses often require different combinations of properties. Consequently different grades of silica sand are usually not interchangeable in use. Silica sands command higher prices than construction sands. This allows them to serve a wider geographical market, including exports”.

- 8.2 AE said that silica sand, despite its properties was not always used for glass making, and it was not clear why a ten year landbank was required if the sand was being put to a lower value recreational use. PC said that Hants CC had experience of reviewing landbanks for different types of sand and would send this to AE.

West Sussex Joint Minerals Plan

- 8.3 Alethea Evans said that the LAA and Wharves and Railhead Study for the Joint West Sussex Minerals Plan had been completed in February 2014. The work is now attempting to quantify the possible demand for minerals from key aggregate reliant investment. The assistance of SEEAWP, focusing on MPAs initially, would be appreciated.

AE has supplied a note setting this out in more detail as attached to the minutes.

Aggregate Survey Returns and Confidentiality

- 8.4 Paul Sanderson said that the South East Minerals Planning officers had discussed the mpa advice note dated 6 March 2014 to AWP and RAWP Secretaries on Aggregate Survey Returns and confidentiality. The advice was generally welcomed, but it appears to need some amendments. PD and other MPA officers supported this, particularly regarding point 5. A minerals authority would seek the views of the individual supplier, but not seek permission, as the decision whether to release survey information to the public or in un-collated form, perhaps in response to a Freedom of Information Act request, lay with the authority. PS agreed to write to mpa on the suggested amendments.

9 Date of Next Meeting

- 9.1 The next SEEAWP meeting is to take place **at 2pm on Wednesday 22 October 2014** at

Venue to be confirmed

Will MPAs please note that this means updated LAAs should be submitted to the Secretary at the latest by 8 October, and preferably before the end of September.

DtC03b – Supply and Demand Research Paper (9 July, 2014)

Joint West Sussex Minerals Local Plan

Aggregate Supply and Demand: Do we have the capacity to support the economy over the next 15 years?

Following completion of the LAA (Feb 2014) and the Wharves and Railhead Study (LUC Feb 2014) it became apparent that WSCC/SDNPA needed to carry out further work and apply local knowledge to the issue of aggregate supply and demand in West Sussex, as suggested by NPPF and NPPG.

WSCC have carried out scoping and commenced initial data gathering in an attempt to forecast mineral demands in future beyond a 10 year average as set out in the LAA.

The work is an attempt to quantify the possible demand for minerals from key aggregate reliant investment. It is hoped that we will be able to compare supply and demand experienced over the previous 10 years to ensure that the quantum of 'supply' within the remit of the Minerals Local Plan (inc. land won, and available minerals infrastructure capacity) can meet predicted/committed demand.

It is not an exercise in relating aggregate use to a specific housing project or road scheme; instead we are seeking to compare investment levels.

In scoping the research, we identified two initial areas of key aggregate demand: housing and road/rail investment. We have started to collate the following key information:

- Housing completions in **West Sussex** over the past ten years (to match the ten year aggregate sales data);
- Planned housing delivery up to 2031 (to match MLP plan period) – This was prepared by looking at local district and borough plans, and speaking to relevant internal and external officers to verify the figures.
- Housing completions in **Hampshire, East Sussex, Brighton and Hove, and Surrey** (although Surrey data taken from CLG's live data tables as they don't record completions themselves unlike all other authorities)¹

¹ Completions data from CLG differs from that collated by MPA's as the monitoring (in WS at least) is carried out through physical monitoring. CLG data is based on the Districts P2 returns and added together with National House Building Council data and additional data from other private approved building control inspectors. The two datasets do not match.

- Information on highway capital investment programmes for **West Sussex** as a highways authority:
 - investment/works completed over the last ten years;
 - Planned or committed future works/investment as far as known;
- Information has been sought from the Highways Agency regarding capital investment programmes:
 - We are seeking information on the previous ten years, and also future plans.
 - This has mostly included discussions with them about where the aggregate used on roads comes from for road works in West Sussex (evidently not from West Sussex)
 - Discussions are now being undertaken with Aggregate Industries, who are the supplier to Balfour Beatty, who hold the contract.

As it stands, there is uncertainty around the location for this work, whether it will become part of the West Sussex LAA or be presented as a standalone piece of work supporting the Joint Minerals Local Plan. It is our intention to gain as full a picture of where aggregates are used in West Sussex now, how they were used in the past, how they are likely to be used in future.

In order to develop the research further, the Authorities would appreciate the assistance of SEEAWP, focusing on MPAs initially, to fill in the gaps in the evidence as follows:

1. Planned housing delivery up to 2031 in **Hampshire, Surrey, Brighton & Hove, East Sussex;**
2. Information on highway capital investment programmes for **Hampshire, Surrey, Brighton & Hove, East Sussex** as a highway authorities:
 - investment/works completed over the last ten years;
 - investment/future work planned or committed as far as known (project details/name would be very useful).

If you are able to help the Authorities build a picture of past and future supply/demand this would be appreciated. We are more than willing to share the data with contributing Authorities in addition to the write up, once we have engaged with minerals industry representatives.

Once the initial information on housing/highways has been gathered, the scope may be expanded to cover other investment projects (schools, hospital trusts, etc).

**DtC04 - Meeting with East Sussex County Council and Brighton and Hove
Council (1 October 2014)**

West Sussex Joint Mineral Local Plan

NOTE OF MEETING

Mineral Supply and Demand: Forecasting future changes

Wednesday 1 October 10-12noon

Meeting attendees

Darryl Hemmings
Alethea Evans
Rupy Sandhu
Tony Cook
Pat Randall
Mike Holford

Notes of meeting

DH gave a brief introduction to the draft forecasting report as issued to all attendees one week prior to the meeting.

TC indicated that in principle, the preparation of the report was welcomed, but there were a number of areas which warranted further discision and consideration:

➤ **Movements of mineral**

TC - Data on the movement of minerals is collected through the 4 year national survey led by CLG. The last survey was completed in 2009 and the next one is likely to commence in April 2015, it was delayed from April 2014. It will start to report in autumn 2015 but the final report may not be available until the end of 2015. The information supplied from this survey should be fed into the MLP evidence base, and possibly this report as necessary.

AE and TC agreed that the 4 year survey might not give the detailed answers, relating to destination of minerals imported into Shoreham.

PR- where are minerals landed/imported into Shoreham actually used?

TC and AE concluded that, beyond the 4 yr survey, it might be necessary to consider looking at destination of minerals and final uses.

• **SOCG**

Indicates a commitment to further work by all parties jointly, this is considered to be this draft report. It does not indicate that ESCC support scenario W3 of the W&R Study.

• **ESCC supply of land won aggregates**

TC set out the situation in ESCC:

Current permitted supplies of land won supplies in ESCC are on the far eastern border with Kent. No additional sites/resources have been identified through the recent draft sites Plan. The only permitted aggregate extraction site in ESCC is a candidate RAMSAR site. It is possible that this could result in limitations to the operation of the site/extraction of the mineral. Once the RAMSAR designation is finalised a review of consents (ROC) is likely to be required. Timescales for this are currently unknown but likely to be resolved within the period of West Sussex Mineral Local Plan (before 2031).

This situation puts emphasis on the importance of marine won/marine imported materials to markets in East Sussex.

Newhaven Port struggles to maintain commercial activities. On the minerals side, Tarmac have now moved all activities to Shoreham. Dredging the northern part of Newhaven Port is costly and may be difficult to justify where commercial uses are not making a significant commercial contribution to the Port.

In light of the challenging aggregate supply picture in East Sussex, it may be useful to update the circulated WS Mineral supply and demand forecasting report. This could usefully involve an update to the report to reflect the commentary discussed.

TC indicated that housing growth is only one aspect of economic growth and may not correlate to growth in aggregate usage directly.

DH indicated that housing projects brought additional infrastructure including schools, roads and commercial development and therefore was considered to be a measurable tool, due to the availability of quality data.

PR set out that there may well be data available relating to investment/growth in:

- Schools;
- Hospitals;
- Newhaven access roads;
- Rampion;
- Universities;
- Marinas.

DH confirmed that WSCC would be happy to incorporate this information into the report if it could be supplied in a useable form (consistently across a number of years in the past and into the future and capable of comparison). To date, WSCC had been unsuccessful in tracking down such information and had concluded that it may not be necessary in any case, due to the likely links with housing trends.

- **Update draft report**

TC pointed out a possible error with the figures in a table in the draft report and noted that there may be a few additional areas of

ACTION: RS agreed to double check the figures and calculations and confirm any corrections as necessary.

DH proposed the inclusion of a new scenario based on 'future ESCC aggregate changes':

- the identification of growth trends based on difference between past delivered growth and future planned growth:
 - Past investment (10 years) in highway infrastructure and/or maintenance
 - Future planned investment in highway infrastructure and/or maintenance, and an understanding of any 'exceptional projects' that might come forward in the next 15 years.
- The impact on future supply options in the absence of land won aggregates in ESCC.

ACTIONS:

RS to assist ESCC and B&H with a guide to data gathering and presentation- to facilitate their work in identifying the source, depth and scale of information to be provided back to WSCC.

ESCC and B&H: to supply data as requested by Friday 14 November

DH set out that a meeting with Shoreham Port Authority was planned for Thursday 2 October, to discuss the draft report and to discuss any options for future supply through Shoreham. Amendments to the draft report suggested through that meeting will be used to update the report.

ACTIONS:

MH to liaise with Rob Fraser regarding the email suggesting additional/ supplementary work to take this issue forward, beyond the report being prepared by WSCC.

AE to circulate timetable for work on updating the report, indicating roles and deadline for contributing organisations, linked to JAAP timetable as necessary.

**DtC05 - Meeting with East Sussex County Council and Brighton and Hove
Council (21 February 2015)**

West Sussex Joint Mineral Local Plan

NOTE OF MEETING

Mineral Supply and Demand: Forecasting future changes

Friday 21 February 2015 10-12noon, Kings House, Hove.

Meeting attendees

Pat Randall (ESCC)
Mike Holford (B&HCC)
Steve Tremlett (B&HCC)
Darryl Hemmings (WSCC)
Rupy Sandhu (WSCC)

Notes of meeting

- **Draft Report**

Prior to the meeting, PR had provided some comments on the draft report (see Appendix 1). RS went through each comment providing a response, and where necessary, agreeing to make changes to the report. The following key changes were agreed to the draft report;

- Update to paragraph 6.3 to make clear that Scenario 1 is based on a continuation of supply in line with previous sales (10 year averages)
- Update the report to provide more detail around the scenarios, and the theory/basis of them
- Re-title the scenarios so they are more easily identifiable
- Correction of typo in paragraph 6.11.
- Clarify that Halls Wharf (Cemex) straddles both West Sussex and Brighton and Hove.
- Paragraph 7.10 will be re-worded to provide clarity on what the Statement of Common Ground means.
- Further references to data will be added.

Brighton and Hove and East Sussex are supportive of the approach being taken, as set out in the draft report.

Action: Implement changes set out above (RS)

- **General Discussion**

There was a discussion about how changes being made to the report will be set out.

- Suggested that a table could be used, setting out what changes are made, why, and who they were requested/suggested by.
- Would provide a good summary of discussions and outcomes, whilst also providing evidence of on-going constructive and active engagement in the spirit of the duty to cooperate.

There was a general discussion about gaining a better understanding of capacity at Shoreham Harbour. PR suggested that we could speak directly to the operators of wharves to understand what their true capacity may be.

Action: Discuss site capacity at Shoreham with operators (RS)
Action: Prepare summary table setting out issues and changes made following dialogue to be incorporated into a future report on duty to cooperate (RS)

The potential capacity at Common User Terminals at Shoreham Harbour was discussed and the following questions raised;

- What evidence do we have of this being usable?
- How would we use this in policy terms/apply it to the plan?
- What is the potential capacity?

The discussion led to an agreement that these issues would be discussed in more detail through a meeting between WSCC and Shoreham Port Authority.

Action: Speak to SPA about how Common User Terminals can be applied to the JMLP (RS/DH)

A discussion took place about whether the work on mineral demand forecasting should take account of other potential mineral uses (e.g. large infrastructure projects). It was recognised that there are issues with reliability of information about other potential uses. It was agreed that the minerals industry will be asked to provide additional information.

Action: Request information on other potential mineral uses from the minerals industry (RS)

Updates were provided on relevant local plans;

- Adur LP has been delayed, likely to go through Reg19 this summer.
- JAAP submission will take place late 2015, with the EiP around Summer 2016
- ESCC and B&H Sites Plan
 - The Sites Plan implements the wharf safeguarding requirements set out in the adopted WMP and identified the 3 ports, including Shoreham
 - Subject to the elections, the Sites Plan will be going to members this summer for a decision.
 - Doesn't allocate specific wharf sites (Policy 9)

Next Steps

It was agreed that WSCC would undertake the following work;

- Meet with SPA (March 2015) and discuss the following
 - Common User Terminals
 - Potential policy options
 - Sales v Landings
 - Potential of Britannia Wharf
 - Capacity updates
- Will add additional questions to the report and incorporate any changes required
- Consult the minerals industry on the draft report.
- Aim to present to SEEAWP in 3 months' time (next SEEAWP tbc)
- A new SoCG likely to be required – anticipated around September?

End

Appendix 1

Joint West Sussex Minerals Local Plan – draft report “Aggregate Supply and demand: research, analysis and future policy approaches”

Thank you for consulting us on the latest draft of the above report.

We recognise that the report has now been extended to cover an additional scenario looking at future demand from East Sussex and B&H. The data supplied by ESCC and BHCC has been applied to the report model to conclude on the potential capacity needed at Shoreham Port in 5 different scenarios. We have not made comments on the use and modelling of the data supplied which we assume has been correctly applied.

We support the recognition in the report (4.2, 4.7, end of 4.8) of the significant importance of exports from West Sussex being imported into B&H and East Sussex, and the reliance on these for constructional needs.

4.14 Indicates that aggregate sales have been up since 2011 but housing completion levels are relatively flat. Some assessment needs to be made as to where the increased sales of aggregates are being used. If it is not for housing is it for a particular project or a range of infrastructure developments and where are these located?

6.3 Last sentence may be clearer if reworded to say that Scenario 1 is based on an assumption that a continuation of aggregate provision in line with past demand will meet future demand.

6.5 What is the basis/theory for the proposed split of aggregate sources in the 4 sub -scenarios (and to an extent in scenario 3 and 4)? This needs to be explained.

6.11 It is not clear where the 19% increase in crushed rock (increase in highway funding) comes from (there are 19% decreases in 6.14?). Is this a reference left in from the earlier draft of the report? If the 19% is an error does this affect the data in the Scenarios?

Section 6 - It would be useful in this section to explain the scenarios in a comparative table, e.g. in Table 14 rather than just saying “high growth” for scenario 4 state “Demand based on future planned housing and increased highways in West Sussex, East Sussex and Brighton & Hove”.

6.20 and 7.24 (and see 7.26) - Key point from Scenario 4 (Demand based on future planned housing and increased highways in West Sussex, East Sussex and Brighton & Hove) is that under 4a marine landed sand and gravel could be as high as 1 724 439 tpa and marine landed crush rock could be 205 929 tpa, totalling 1 930 368 tpa. This is a higher capacity than previously considered. There would be to a shortfall of capacity of 209 368 tpa.

7.8 It should be emphasised that the current operational capacity of wharves includes Halls Aggregate wharf (Cemex) which straddles the West Sussex/B&H border.

7.10 – 1st sentence – As you may recall at our meeting on 1/10/14 (and as stated in the note of that meeting) we clarified that, contrary to the statement in the SOCG , ESCC would not support Scenario W3 in the Wharf and Rail Study.

7.10 and 7.18 - Shoreham Harbour Common User terminals – More evidence is needed on how the use of these terminals will operate, for example how will they be protected from other competing uses? Will they be designated in the MLP?

7.15 Regarding reliable data on crushed rock – could this be sought from the operators or Port?

7.23 – Not sure that Sales data does necessarily exaggerate the demand for wharf capacity. Recent high sales may just reflect high demand, which may in turn continue and lead to an increased need for higher capacity.

7.26 The conclusion that the “worst case” scenario could lead to a shortfall of capacity of 209 368 tpa is the area which obviously needs attention and on which discussion over future wharf provision should focus.

PR

25/2/15

DtC06 - Summary of LAA Responses (February 2015)

Summary of Local Aggregate Assessment (2015) Responses

Consultee	Comment	WSCC/SDNPA Response
East of England Aggregate Working Party	Page 5 refers to 918,000 tonnes but this is not on Table 1/Figure 1. Is it meant to be?	The 918,000 figure was from 2003, prior to the 10 years and therefore doesn't appear in Table 1/Figure 1. Text has been adjusted accordingly.
East of England Aggregate Working Party	Are the totals in Para 2.2.5 for recycling as a whole or adjusted to take account of the footnotes referred to in (iii) below?	Text amended to clarify where the figure has been derived from.
East of England Aggregate Working Party	Footnotes (i) & (ii) para 2.2.5 page 15 are the estimates saying this was available for recycling at the time or is always available irrespective of other throughputs?	Clarification provided.
East of England Aggregate Working Party	Para 2.2.6 is there a typo error in the 644,915 figure compared to para 2.2.5?	Figure corrected
East of England Aggregate Working Party	Para 2.4.4 refers to the AMR recording crushed rock production. Little details elsewhere in assessment about land won crushed rock originating in county. Executive summary does not mention indigenous land won crushed rock.	Reference included in the executive summary.
East of England Aggregate Working Party	Para 3.0.1. - Table 11 the 3 year average for Marine won sand and gravel is incorrect as is the 3 year average in the Total column.	Figures checked and amended accordingly
East of England Aggregate Working Party	Para 4.1.1 - Would it be worthwhile and for clarity as well to add in that although a small amount of imported sand and gravel, the supply related factors	Clarification provided in the text.

Summary of Local Aggregate Assessment (2015) Responses

	rely on outside county quarries as much for the sand and gravel as for the crushed rock. The latter does acknowledge this outside factoring.	
East of England Aggregate Working Party	Para 4.1.14 - It has been raised in various LAA about how marine supplies could replace land won sources. However, reliance on this is not definite and for purposes of the "landbank" assessment we had been told previously that as part of the apportionment, marine supply had been factored in. Putting a figure on marine landed totals and using these as a definite replacement figure for elements of the sand and gravel supply is questionable. Experience from our own county is that once marine material is landed it goes straight out of the county rather than being used as any type, or showing any evidence of being, any type of substitute for home won material.	Comment noted
Marine Management Organisation	No Comments	N/A
Natural England	Welcome the consideration of Marine plans and inclusion of Map A3. Look forward to early engagement on the review of the Minerals Plan, particularly where there are potential conflicts or opportunities for the natural environment.	Comments noted
South West Aggregate Working Party	Crushed rock imports have increased from 0.1mt in 2004 to 0.8mt in 2013 but the LAA also identifies surplus capacity at railheads. The LAA notes that imports appear to be compensating for reduced land won sand and gravel (in West Sussex) with the expectation that this trend is likely to continue and that it will be important for the MLP to safeguard	Paragraph 5.0.5. amended to clarify that reference to imports replacing land-won sand and gravel relates to marine-won sand and gravel.

Summary of Local Aggregate Assessment (2015) Responses

	<p>railheads to ensure continuity of supply.</p> <p>While there is no envisaged problems in maintain supply of crushed rock to West Sussex from Somerset, the Working Party and Somerset Council look forward to further dialogue with West Sussex about the likely future demand and engaging with the MLP process to further consider and understand the potential implications for the south west in supplementing the supply of aggregates in West Sussex.</p>	
East Sussex County Council	Support points recognising the importance of exports from West Sussex being imported in B&H and East Sussex.	Comment noted.
East Sussex County Council	Executive Summary – Chapter 2 – clarify whether “wharves within Shoreham Harbour” includes wharves in B&H?	Wording clarified to confirm that the data is from the Crown Estate and refers to landings to Shoreham Port and therefore includes wharves in B&H.
East Sussex County Council	Executive Summary – If 1.68mt were landed in 2013 was the additional 0.65mt (compared to 1.03mt) crushed rock? Does the 1.88mt capacity include capacity for crushed rock? Confusion in 2.3.11 where marine-won dredged and crushed rock imports are combined together.	Text amended to provide clarification.
East Sussex County Council	Para. 2.3.9 – Note the significant increase in sales of marine dredged sand and gravel from West Sussex wharves in the last 3 years.	Comment noted.
East Sussex County Council	Para. 2.4.3 – Should be acknowledged in supporting text that sales of crushed rock have gone steadily up since 2009.	Reference to this included in the text.

Summary of Local Aggregate Assessment (2015) Responses

East Sussex County Council	Para 4.1.16/17 – the surplus and additional capacity conclusions need to be looked at in more detail and acknowledge that this is being undertaken in the draft report “Aggregate supply and demand: research, analysis and future policy approaches”.	Comment noted.
East Sussex County Council	Para 4.2.1 – Should be noted that if the shortfall required to make up the land-won contributions is not identified in the MLP there may be even more demand for import capacity at Shoreham Port. This is partly mentioned in the summary box at the end of Chapter 4.	Reference to this included in the text.
East Sussex County Council	Para 4.2.6 – replace the word ‘possible’ with ‘likely and probable’.	Text changed accordingly.
East Sussex County Council	Need to include other East Sussex County Council planned infrastructure projects.	East Sussex infrastructure projects included.
Surrey County Council	Replace reference to Local Aggregates Assessment with Local Aggregate Assessment	Document title changed
Surrey County Council	Unclear from LAA whether there are any secondary aggregates sales or production sites operating in the county (as opposed to recycled aggregates)	Clarification provided in the text.
Surrey County Council	Page 11 – Definition of secondary aggregates should refer to industrial by-products and mineral wastes that have not been previously used.	Definition changed.
Surrey County Council	Page 11 – Definition of recycled aggregates could include reference to excavation waste such as stone and rock.	Definition changed.
Surrey County Council	Incorrect spelling – road ‘planings’.	Typo amended.
Surrey County Council	Para 2.2.2 – Revision to paragraph suggested – <i>“Recycled and secondary aggregates have a growing use in applications such as base layers for new developments and road construction, helping to reduce</i>	Paragraph amended.

Summary of Local Aggregate Assessment (2015) Responses

	<i>the demand for primary aggregates. Higher quality recycled aggregates can also be used in the production of concrete and other construction materials”.</i>	
Surrey County Council	<p>Para 2.2.4/2.2.5 - Experience in Surrey (evidence gathering to support Aggregates Recycling Joint DPD preparation + Examination) indicates that the total annual production capacity of alternative aggregate production sites in the county has no bearing on the total annual rate of production which is substantially lower. We identified a number of reasons why this was the case including operators significantly over stating the site capacity on their annual monitoring survey returns. We also have a number of production facilities on sites that process more than one waste stream which seemed to contribute to operators over-estimating capacity. This led us to conclude that the total annual production capacity data provided by operators was never going to be delivered. As a consequence, we found that providing a realistic estimate of actual production capacity was fraught with difficulties. Hence, I would advise caution in relation to the suggestions that; (i) the supply of recycled aggregates can be worked out by looking at the capacity of waste sites that turn C&D waste into recycled aggregate; and (ii) that the actual figure for aggregates recycling in the County is likely to be significantly higher than the total capacity of 642,915 tpa due to the use of mobile recycling facilities - in view of the possible uncertainty over your base line capacity figure. However, in saying that, there may be reasons why have greater confidence in the reliability of your annual production capacity estimates and I note that your sales peaked at 630,000 tonnes;</p>	<p>Comment noted. Consideration will be given to this in future LAA.</p>

Summary of Local Aggregate Assessment (2015) Responses

Surrey County Council	Para 4.1.1 - Should final sentence also refer to secondary aggregates which have a different source to recycled aggregates as indicated above?	Text changed accordingly.
Surrey County Council	Para 4.1.6 - Similar to the situation in Surrey up until recently in relation to soft sand, the second sentence refers to one site holding a large proportion of the permitted reserve. Suggest clarifying ref to 'sales from the sites are more evenly spread which suggests that other sites are still able to be competitive.' Is this saying that sales from the remaining smaller sites are evenly spread across the county and on this basis the large site containing the majority of the reserve is not stifling competition ? If so, trends in the volume of sales from the smaller sites compared to the large site may be a more relevant indicator. In any event, no real need to justify current position in relation to ref from NPPF para 145 which really sets down a marker for consideration when new applications are submitted. In this case, this extract from the NPPF would appear to weigh in favour of any new soft sand applications submitted in West Sussex (from a different operator to your large quarry) in order to increase competition - I think that is the main intention of this policy advice.	Comment noted and text changed accordingly
Surrey County Council	Para 4.1.14 - we would be interested in hearing the outcome of any future discussions about the viability of marine soft sand resources as a replacement for land-won sources.	Comment noted.
Surrey County Council	Para 4.1.20 - Availability of recycled and secondary aggregates also depends on whether there is sufficient capacity to manage peaks in the source of supply (the LAA suggests that there is), the distribution of existing	Comment noted and text changed to reflect this.

Summary of Local Aggregate Assessment (2015) Responses

	capacity, whether material is being exported to sites beyond the county boundary due to a lack of capacity in the locality, and whether there is over reliance on temporary facilities such as at minerals workings which is the case in Surrey.	
Surrey County Council	Page 34 - (i) Summary box, 4th bullet, replace ref to SSI with "SSSI"; (ii) final bullet, replace ref to An number with "A number" and is likely with "are likely".	Typos amended
Surrey County Council	References page - You can now refer to the Surrey LAA November 2014 rather than the draft version.	Reference changed

DtC07 - SEEAWP Minutes (23 February 2015)

Technical Secretary: C R Waite, 22 Sittingbourne Road, Maidstone, Kent ME14 5LW

: Tel: 01622 764335, e-mail: chriswaiteplanning@blueyonder.co.uk

**Minutes of Meeting of SEEAWP held on 23 February 2015
at Local Government House, Smith Square, London SW1P 3HZ**

Present:

John Kilford	Chairman		
Matt Meldrum	West Berks	Mark Worringham	Reading
Ian Church	Windsor & Maidenhead.	Vanessa Rowell	Wokingham
Lester Hannington	Bucks CC	Tony Cook	E Sussex CC
Bryan Geake	Kent CC	Claire Potts	S Downs NPA
Catherine Smith	Medway	Peter Day	Oxfordshire CC
Paul Sanderson	Surrey CC	Rupy Sandhu	W Sussex CC
Chris Mills	Isle of Wight	Laura Davidson	Milton Keynes
Bob Smith	MPA	Richard Ford	MPA
Stewart Mitchell	MPA	David Payne	MPA
Mark Russell	BMAPA	Steve Cole	BAA
Nick Everington	The Crown Estate	Eamon Mythen	DCLG
Chris Waite	Technical Secretary		

1 Welcome & Apologies

- 1.1 The Chairman welcomed those who were new to the meeting. Apologies were received from Lisa Kirby (Hampshire), Simon Treacy (MPA) and Sue Marsh (EEAWP).

2 Minutes and Matters Arising from 27 October 2014 meeting

Minutes:

Following discussions with Surrey, DP proposed an amendment to the first three sentences of paragraph 3.9. This would now read: DP said that a similar issue applied to Surrey, where a shortfall in supply of sharp sand and gravel was forecast to take place at or near the end of the Plan period. The South East as a whole, together with Buckinghamshire and Hampshire had significant sharp sand and gravel resources. Surrey 2014 LAA expected to continue to import land won sharp sand and gravel from other authorities within the region for the foreseeable future. Surrey and SEEAWP agreed this amendment.

Matters Arising not dealt with under other agenda items:

2.1 7.1 TC said that there was now an agreed draft of the POS/MPA LAA Guide. This would now be prepared for the web and copies would be circulated to AWP representatives via the Secretary.

8.4 PS said that the points he had raised with mpa regarding their Note on Confidentiality and Survey Returns had been resolved. He would send a note to the Secretary to circulate to the AWP.

3.4 MM reported that discussions with adjoining MPAs on provision for soft sand, including Wiltshire were on going. A resolution would take place in the W Berks Minerals & Waste Plan.

3.6 MW said that he had replied to the Secretary. Four of the Berkshire authorities were still discussing whether they might prepare a joint plan. Slough had declined to take part.

3.12 In response to the Chairman all authorities agreed that LAAs would be titled the same year as covered by the survey.

3.13 The Secretary confirmed that he had sent letters to each MPA as agreed by SEEAWP, and a copy of one to mpa and BAA for information.

5.2 EM said that in response to DCLG consultation, UKMF and POS supported the National Survey to cover 2014. BGS had finally been authorised this month to undertake the survey. He would be contacting Jo Mankelow this week to establish the BGS programme to get the survey up and running. The procedures would be the same as in previous years, including forming a Steering Group, and he anticipated that the survey forms would be the same as last time. He understood that SEEAWP was concerned for the forms to be issued as soon as possible. EM confirmed that the following national survey would be for 2017 in order to return to the 4 year cycle.

3 West Sussex & Kent Draft LAAs

West Sussex draft LAA

- 3.1 The draft LAA had been circulated by the Secretary. He reported that the coverage of the LAA was comprehensive, including an assessment of aggregate requirements to 2031 based on the 10 year average using the latest 2004-2013 data. The LAA had also taken local circumstances into account, including to the extent of recognising that three of the five existing Minerals Plan allocations were undeliverable. Future allocations for aggregates would need to consider the implications of the South Downs National Park designation.
- 3.2 CP said that to assist forward planning, a study by consultants had been commissioned jointly by East and West Sussex, Hampshire and the SDNPA. This was due to report in April.
- 3.3 SM drew attention to Table 8 in the LAA which showed for 2012 and 2013 combined, 1Mt more sales than marine aggregate landings. What was the reason for this? RS said that he had also been concerned at the level of change and was investigating with the operators and The Crown Estate whether the figures were correct, or whether there had been double counting. He would advise the Secretary when this was resolved so the AWP could be informed.
- 3.4 The Secretary was asked to write to West Sussex approving the draft.

Kent draft LAA

- 3.5 The revised draft had simply updated data and had been circulated. However, one company in Kent considers that a substantial proportion of its soft sand reserves, some 4Mt, should be reclassified as silica sand. BG said that this was now before the Inspector who would hold the public Examination into the Kent Minerals Plan. If confirmed, this would reduce the reserves of mortar and building sand, and would be reflected in the 2015 LAA.
- 3.6 PD asked why the sand and gravel figures did not include hoggin and bulk fill? BG said that this was to be clearer on the good quality aggregate needs. However, he recognised the LAA did not identify the amount of hoggin & bulk fill, and that this was out of step with other LAAs and the AM reports.
- 3.7 CP asked whether Kent could establish the export figures to SE counties, breaking down the 'rest of the South East' grouping. BG was advised that he might be able to obtain this if he contacted Jo Mankelow at BGS who oversaw the 2009 survey.
- 3.8 SC said that the potential change in the reserves of soft sand was so large, the LAA needed 'a health warning' and proposed the following recommendation. 'Whilst SEEAWP planned to approve the factual changes in the draft LAA, it recognises that this is subject to change at the Public Examination into the Kent Minerals and Waste Local Plan'. SEEAWP agreed the recommendation.
- 3.9 In response to the Chairman, West Sussex and Kent agreed that they, together with all other SEEAWP MPAs, would submit 2015 LAAs to the Autumn SEEAWP meeting.

4 Marine Aggregates

Marine Aggregates – Capability & Portfolio 2014

- 4.1 The Secretary said that the latest Capability and Portfolio by The Crown Estate had good news for this region as, due to licenses granted in the last 12 months, the reserves of primary aggregates had been increased to over 20 years at the average off take of the last 10 years. The report provides valuable data for MPAs in drawing up their LAAs.
- South Coast Plans: Options Workshops
- 4.2 The Marine Management Organisation (MMO) had organised three Workshops on the Options report which had been circulated to SEEAWP. Several SEEAWP representatives had attended one or other of the workshops. All had found the exercises that MMO asked to be completed on the day complicated, and it was difficult to come to conclusions on the options presented. These had been drafted so they were distinct, but in doing so lost some credibility and included inconsistencies. TC said that the key problem was that draft policies were absent from the presentations. The representatives at the workshops were asked to comment on the narrative and objectives without seeing what policies would emerge.
- 4.3 MR said that the Options were only part of the process leading up to the draft Plans. He considered that in a number of areas the MMO was going beyond the powers of a Marine Plan and that the only policy option that would be acceptable to government would be the flexible option. He had three main points:
- policy wording needed to be consistent across the Plan areas. This would be important when the adjoining Thames Plans were prepared.

- one option was proposing greater weight of protection for aggregate exploration/option areas than for marine licence/applications areas. This needed to be corrected.
 - MMO need to reconsider its proposed sustainability approach that would weigh one user, including aggregates, against another. Was this appropriate for a Marine Plan?
- 4.4 SEEAWP agreed to make a response to MMO as drawn up by MR on the basis of the above. He would draft it this week, which would enable the Secretary to circulate, including to the London AWP for their agreement as a joint response.

5 Soft Sand; Intra-regional Movement of Aggregate; Overall Supply

- 5.1 At the October meeting industry representatives expressed concern as to whether sufficient provision was being made for soft sands, and whether MPAs were paying sufficient attention to meeting the anticipated shortfalls arising from the imbalance in reserves and resources in the west and east of the region.

Soft Sand

The Secretary wrote to those MPAs which did not have specific figures for soft sand in their 2014 LAA assessments to ask in confidence for a soft sand figure. He sought to establish whether these MPAs were making provision for 0.2mtpa, which in addition to the 1.6mtpa specified together in 4 LAAs, would meet the 1.8mtpa regional 10 year sales average. SEEAWP 15/03 set out the results. Although a number of MPAs had no soft sand resource or produced a very low level of sales, principally from sharp sand and gravel sites, the authorities that had not specified a figure were together proposing to provide for at least 0.2mtpa.

Location of Supplies and Intra-regional Movement

- 5.2 The LAA assessments show a shortage of sharp sand and gravel supplies in the east of the region, including Kent and Surrey, whereas the reverse is the case for soft sand supplies, 70% of which are in Kent and Surrey (however this resource may be reduced - see paragraph 3.5 above). LAAs have had regard to circumstances in neighbouring authorities, and have emphasised the opportunity for marine supplies and recycled material to assist in making up a shortfall, rather than land-won imports from other SE authorities.

Overall Provision

- 5.3 In correspondence on the above, DP had sent the Secretary an outline of mpa national land-won forecast of sales, which suggested that sales might be some 61Mt by 2016. This implied a 20% increase 2011-2016 which was not the experience in the SE where sales had continued to decline. However, even if this forecast was optimistic the Secretary pointed out that with a lower growth figure sales could soon exceed the 10 year average as the years before the recession would no longer be in the calculation.
- 5.4 SC said that although soft sand comprised a small part of the land-won aggregate sales, sufficient flexibility should be available to meet a sudden and significant upturn in demand. He cited Dorset where soft sand sales are now above the 10 year average. He also considered that the principle of local supply being met by local materials should be more heavily weighed in identifying new provision. There needs to be a balance struck protecting a National Park and the impact of transport from east to west or vice versa across the region.

- 5.5 DP said that the mpa forecast was for all aggregates (ie not separating out marine and land-won sources). In response to PD he said that the forecast could be made available to SEEAWP. EM said that AMRI 2013 figures showed a marked increase in sales, some 35%, together with increased employment figures in the industry.
- 5.6 PD disagreed with the Secretary's report which said that the cross over of sales exceeding the 10 years average would have implications for NPPG and the basis of LAA assessments. PD considered that at that stage the 10 years average remained the starting point for LAAs, with the consideration of other relevant local information having a larger part to play. DP agreed, and said that the 3 year average would also have more significance. TC said that as LAAs were taken forward year by year they would be better able to analyse demand/need as land won sales were only part of the total picture. LH said that MPAs are required to cooperate in preparing Local Plans and therefore evidence would need to be provided to support any reliance on supplies from adjoining authorities.
- 5.7 SEEAWP agreed with the Chairman's summary that the issue of soft sand provision would become clearer as Local Plans progressed, that SEEAWP could not influence intra-regional movements at present, and both situations needed to be monitored.

6 DCLG Update

- 6.1 EM reported that:
AMRI for 2013 would be published on 27 February and put on the web. This showed an upsurge in demand and employment in the industry. AMRI for 2014 was to be initiated and steps were being taken to extend the contracts to 2015 and beyond.
AWP Secretary contracts would be for 3 years with a one year break clause to reflect annual spending reviews. OJEU competitive tenders had been delayed but are expected after one more clearance. The purdah period (from 31 March) and outcome of the General Election would not affect appointments. There would be a period when no Secretaries would be in post between 31 March and perhaps May when the contracts are planned to be awarded. He recognized that unless BGS was able to start the process including issuing the survey forms in March, then the national survey would not progress until May.
NCG meeting: discussions were to be held this week whether to have a meeting before or post the Election.

7 Chairman of SEEAWP

- 7.1 The Chairman reminded members that this would be his last meeting. Had SEEAWP decided on a new Chairman for future meetings? PD said that discussions had been held, and ideally an independent Chairman with experience such as held by the current Chairman would be preferred. But no such replacement had been identified. He proposed that Tony Cook be elected Chairman. TC said he was happy to take on this role, on condition that the situation was reviewed in a years time. SEEAWP thanked TC for accepting the post and he was elected Chairman.

8 Any Other Business

- 8.1 On behalf of SEEAWP, TC thanked JK for the cordial way in which he had acted as Chairman, and thanked him for the time and interest that he had taken in fulfilling the role over a number of years. JK said that he had enjoyed the role, and was pleased at how

SEEAWP had reached agreement by consensus, and a way forward had been agreed over issues on which there were differing views.

- 8.2 Similarly TC thanked the Secretary for his role in organising meetings and providing efficient minutes. JK also thanked the Secretary on whom he had depended in keeping in touch and preparing for the meetings.

9 Date of Next Meeting

- 9.1 TC was keen for a date for the next meeting to be placed in diaries. The Secretary reminded SEEAWP that The Crown Estate had offered to host the next meeting with the intention to have a presentation by MMO officers on the South Coast Plans to both SEEAWP and London AWP, as had been done in July last year on the East Coast Plans. It was understood that the writing up and assessment of views taken at the Options Workshops would be completed in May, and MMO would then move forward to preparing the first draft of the Plans. Russell Gadbury was happy to make a presentation as proposed. Although MMO could not specify an appropriate date, SEEAWP agreed that a July date was likely to be most suitable. NE agreed to let TC know dates in July on which the large Crown Estate conference room would be available. TC would select a date and advise the Secretary so he could include in the minutes.

Post Meeting Note: proposed next meeting of SEEAWP – Wednesday 15 July 2015, 2pm at The Crown Estate Office.

DtC08 – SEEAWP Letter (February, 2015)

Technical Secretary: C R Waite, 22 Sittingbourne Road, Maidstone, Kent ME14 5LW
: Tel: 01622 764335, e-mail: chriswaiteplanning@blueyonder.co.uk

Rupy Sandhu
Senior Minerals & Waste Planner
West Sussex CC

27 February 2015

Joint West Sussex & South Downs NPA draft LAA

Dear Rupy,

SEEAWP thanks you for consulting its members on the January 2015 draft LAA. This was considered at its meeting on 23 February 2015. Detailed comments were made at the meeting, and others have been sent to you in correspondence. As those were detailed comments they did not constitute SEEAWP views, but you will no doubt have regard to them.

I am pleased to advise you that SEEAWP approved the Joint West Sussex & SDNPA Local Aggregate Assessment.

Yours sincerely,

John Kilford
SEEAWP Chairman

DtC09a – Response from Essex County Council (30 October, 2015)

From: Philip Dash, Senior Planner [<mailto:Phil.Dash@essex.gov.uk>]
Sent: 30 October 2015 16:39
To: Rupy Sandhu
Subject: FW: West Sussex Minerals Local Plan - Soft sand and DtC

Hi Rupy, hope you are well.

Please find the Essex County Council responses to your DtC letter below.

Q1. Please confirm that the above reflects an accurate understanding concerning the future need for mineral produced in West Sussex.

I can confirm that the data informing Section 1 of your letter is correct, subject to clarifying that the exportation figure of 2.91% relates to sand and gravel from all sources, rather than just land based, which might otherwise be the impression.

Q2. Are there any reasons why any of these options might be undeliverable?

Without access to any of the evidence base associated with the West Sussex Joint Minerals Plan, I do not believe that I am in a position to comment.

Q3. Are there any other options you think which should be considered?

The options put forward appear comprehensive. It is usually the case that a hybrid approach, as offered by Option SS6, is the most sustainable.

Thanks,

Philip Dash MSc MRTPI
Senior Minerals and Waste Planning Officer
Planning and Environment

Essex County Council
Telephone: 03330 136 822
Email: philip.dash@essex.gov.uk | www.essex.gov.uk

DtC09b – Response from Hampshire County Council (5 October, 2015)



Economy, Transport and Environment Department
Elizabeth II Court West, The Castle
Winchester, Hampshire SO23 8UD

Tel: 0300 555 1375 (General Enquiries)
0300 555 1388 (Roads and Transport)
0300 555 1389 (Recycling Waste & Planning)
Textphone 0300 555 1390
Fax 01962 847055
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Enquiries to	Rob Sellen	My reference	
Direct Line	01962 846591	Your reference	
Date	5 October 2015	Email	Planning.policy@hants.gov.uk

Dear Rupy,

West Sussex Joint Minerals Local Plan – Duty to Co-operate

Thank you for engaging with Hampshire County Council in the spirit of Duty to Co-operate.

In response to West Sussex County Council's invitation for views on potential draft options for aggregate supply within West Sussex, Hampshire County Council as a neighbouring minerals planning authority have the following comments to make:

Q1. Please confirm that the above reflects an accurate understanding concerning the future need for mineral produced in West Sussex.

Sections 1.1 to 1.4 are accurate reflections of transboundary movements for primary and secondary aggregates between West Sussex County Council and Hampshire County Council and that West Sussex is a net exporter of primary aggregates to Hampshire.

Figures are based on 2009 data, although 2014 data is expected to be made available soon, and it is likely that there is to be a decrease in land-won primary aggregates exported to West Sussex and an increase in marine-won aggregates.

Q2. Are there any reasons why any of these options might be undeliverable?

Section 2.1 – Sand and Gravel, Table 3 of the document provided by West Sussex County Council shows a revised demand (excluding exports) of Soft sand.

Director of Economy, Transport and Environment
Stuart Jarvis BSc DipTP FCIHT MRTPI

Hampshire County Council as a net exporter of sharp sand and gravel, maintains an approach to co-operate with neighbouring authorities to support regional needs for aggregate supply and considers it important that the issue of cross boundary mineral flows are addressed. Hampshire County Council and West Sussex are both members of the South East England Aggregates Working Party, which aids in assisting mineral planning authorities fulfil the duty to co-operate with other mineral planning authorities in the south east to ensure an adequate supply of minerals for the area.

It is therefore noted that the position of the SEEAWP and duty to co-operate should be taken into account when appraising the options regarding a revised demand to exclude exports of soft sand.

Soft Sand

Options SS3, SS4 and SS5 are considered less sustainable than the other proposed options.

Considering the information in the above paragraph, it is felt that these options do not contribute to regional aggregate supply, and will fail to reduce the existing shortfall of soft sand supply in West Sussex.

Further more, SS5 only allows for imports by road and promotes the least sustainable mode of transport of aggregates.

Sharp Sand and Gravel

With regards to S. 2.1.2 Sharp Sand and Gravel Options, SSG2 appears to prioritise land-won resources over ensuring marine won aggregates contribute to supply.

Secondary and Recycled Aggregate Options

Hampshire County Council strongly supports the use of secondary and recycled aggregates, in line with national policy. Of the Secondary and Recycled Aggregate Options as addressed by S. 2.2 all options appear deliverable, although additionally, with regards to Option SRA 4, while forward looking, this option appears to be slightly out of scope since the option addresses the end use of recycled aggregate and not the source.

Wharf Options

The importance of marine-won aggregate in its contribution to aggregate supply is recognised. Option W2 appears deliverable and is the approach also favored by Hampshire County Council in its own policies.

Railhead Options

Given a headroom capacity of 496,251 tpa at existing operational depots in West Sussex, there appears to be a less justified need for increased capacity, since a considerable level of headroom capacity implies an over reliance on

the level of imported aggregates. Therefore option RH1 is favored, although both are deliverable.

Q3. Are there any other options you think should be considered?

With regards to section 2.2. all SRA options may benefit with safeguarding included within them.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Rob Sellen', written in a cursive style.

Rob Sellen B.Sc. (Hons) AIEMA
Planning Policy Officer

DtC09c – Response from Surrey County Council (September, 2015)

Eleanor / Rupy

West Sussex Joint Minerals Local Plan - Duty to Co-operate

Thank you for your email and attached covering letter dated 16 September 2015 regarding the above. My thoughts are as follows.

Question 1:

I note that the results of the AM2014 Survey indicate that exports of sand & gravel from Surrey to West Sussex increased from 10,000 tonnes in 2009 to 13,800 tonnes (all soft sand) in 2014. However, a large soft sand quarry in the east of the county was unable to identify where it sold its soft sand to in 2014. I note from our records that this quarry sold zero soft sand to West Sussex in 2009 so if there were any exports from this site to West Sussex in 2014, then these may not be significant. You will have recent data on exports from West Sussex to Surrey.

Our prime issue is that exploitable sharp sand & gravel resources in Surrey are likely to run out towards the end of the next decade. So Surrey will become increasingly reliant on alternative sources of supply such as recycled and secondary aggregates and both land-won and marine imports. My understanding is that there is likely to be little scope for Surrey to import land-won sharp sand and gravel from Kent, East Sussex, West Sussex and London due to a lack of such resources in these areas. Nearly all of our imported marine sand & gravel is sourced from wharves on the north Kent coast, but it is possible that there may be an increased demand in future to source marine aggregates from wharves on the south coast. So maintaining wharf capacity on the south coast is an issue for Surrey to ensure flexibility in terms of alternative sources of supply in future. Maintaining capacity at rail depots in and around Surrey (including Crawley) is also an issue in this respect. I note that Rudgwick Brickworks has now closed and the site is being restored. Notwithstanding the above, I would concur with the summary included in your letter.

Question 2:

Surrey has two major soft sand sites located in the east of the county. Once these are worked, the county is likely to be in a similar position to West Sussex with any opportunities for further workings limited to resources situated within the AONB. In terms of the options you have identified:

- Options SS1 and SS2 seem perfectly reasonable;
- Option SS3 - I don't know whether you have sufficient soft sand resources outside the SDNP given that you say that your existing sites are largely within the SDNP. Perhaps it is more of a quality issue and material extracted outside the SDNP would simply require more processing;
- Option SS4 - I don't know whether it is feasible to rely on imports by rail unless you were able to identify rail linked quarries in areas capable of exporting soft sand to West Sussex. None of the soft sand sites in Surrey are rail linked. Whilst this allows you to look for sources of soft sand from much further afield, rail only tends to be viable for the bulk movement of large quantities of mineral over a long distance. Unless existing rail linked soft sand quarries can be identified, the cost of developing a new railway siding is likely to prove prohibitive;
- Option SS5 - Again, the difficulties might be identifying suitable sources of supply within a much more restricted catchment area given transportation costs;
- Option SS6 - This is likely to be easier to run with than SS4 and SS5 as you have greater flexibility and do not need to rely so much on SS4 and SS5;
- Options SSG1 and SSG2 - These would seem perfectly deliverable, with SSG2 also beneficial if the plan area is dominated by one or two operators which may restrict competition;
- Options SRA1-4 all appear deliverable. I think there is merit in seeking to maximise output and encouraging a higher quality product in the interests of conserving the supply of land-won sharp sand and gravel and promoting the efficient use of mineral resources. The issue with SRA3 is that this requires additional capital investment, something an operator will not be keen on if they only have a temporary planning permission. SRA4 is perfectly reasonable but does require co-operation from the district councils including 'educating' development management officers - so implementation is not straightforward;
- Option W1 - Although desirable, I'm not sure if this option is compatible with the Shoreham JAAP;

- Option CL1 - Depending on which sites are allocated, this option may prevent a 25 year landbank at those existing sites having less than 25 years of clay reserves remaining. We have lost a lot of brickworks in Surrey over the past 10 to 15 years. We now have only two remaining sites in the south west of the county where clay extraction and the associated brickworks are situated together. After having been mothballed for many years, many brickworks across the country are re-opening following a massive shortage of bricks although we remain heavily reliant on imports. The surge in demand may justify investment in plant and machinery at sites where the existing plant is outdated and in need of modernisation but such investment is very expensive.

Question 3:

- In relation to sharp sand & gravel, it appears as though sufficient reserves already exist within the plan area. On the assumption that maintaining wharf capacity is unlikely to be that much of a difficult issue for you, notwithstanding the matter of the Shoreham JAAP, an alternative option to seeking further allocations might be to identify areas of search or have a criteria based policy;
- In terms of clay, you seem to imply that the landbank is below 25 years at two of your sites, given that you say that it is beyond 25 years at 3 of your 5 sites. On this basis, is there merit in having a more definitive option to maintain a 25 year landbank at existing sites throughout the plan period. In Surrey, we identified areas of search around our existing brickworks for possible clay extraction in the longer term although my understanding is that we do not have much information on the quality of the clay reserve identified - hence us going down the 'area of search' route.

Question 4 and 5:

This approach would have no impact on Surrey in our plan-period to 2026. Around this time we will run out of reserves in the west of the county. Our two large sites in the east of the county have planning permission to 2030 (Limpsfield) and 2031 (Nutfield) respectively. We only had one soft sand site allocation in our Minerals Plan which received planning permission in August 2014 for the extraction of 4.1 mt. After 2031, my understanding is that options for finding suitable sites in Surrey, even within the AONB, could prove problematic. So we might potentially have to rely on imports from elsewhere from the early 2030s onwards. If West Sussex were unable to export soft sand then that could limit options in Surrey in the longer term.

Question 6:

I'd expect Surrey to be in a position to continue exporting soft sand to West Sussex at previous rates until 2031.

Question 7:

We have one small site near Runfold, Farnham that has very little reserve remaining. All of the remaining reserve is intended to feed the on-site ready-mix mortar plant. We have a further site near Runfold with a small reserve remaining which the operator has no intention of working until post 2026 given that the business is primarily related to aggregates recycling and inert landfill. We have a site at Alton Road near Farnham where our Planning and Regulatory Committee resolved to grant planning permission in September 2014 to extend the lifetime of the site to enable the extraction of 770,000 tonnes of soft sand, subject to the prior completion of a legal agreement. I understand that the legal agreement is about to be signed but given the amount of time that has lapsed, the application will have to go back to committee in October 2015. The site aims to serve the market in west Surrey and east Hampshire.

Based on data obtained from the 2014 national survey, destinations served in 2014 include Surrey, West London, Greater London, Berkshire, East Sussex and Brighton and Hove, and West Sussex. As one large site did not know where it sold its soft sand to in 2014, our records indicate that in 2009, the site sold soft sand to markets in Surrey, Kent and Medway, and Essex, Southend and Thurrock.

Question 8:

The answer has to be no. We are most likely to rely on recycled and secondary aggregates, imports of marine sand and gravel from Thameside wharves (if they are not redeveloped) and wharves on the north Kent Coast, as well as imports of land-won sand and gravel from surrounding counties that have supplies remaining. In terms of West Sussex, I'm not expecting there to be much in the way of land-won supplies being available but the potential to rely more heavily on marine imports into wharves on the south coast cannot be ruled out. So we are in favour of maintaining wharf capacity on the south coast as much as possible to provide us with more flexibility in terms of longer term supply options.

I trust you find these comments helpful and I wish you well with the ongoing preparation of your Joint Minerals Local Plan.

Regards
David Maxwell

Minerals and Waste Planning Policy Team
Surrey County Council
Tel: 020 8541 9379

DtC09d – Response from Kent County Council (2 December, 2015)

Rupy Sandhu
Strategic Planning
West Sussex County Council
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Environment, Planning and
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Phone: 03000 413376
Ask for: Bryan Geake
Email: bryan.geake@kent.gov.uk
2rd December 2015
Your Ref:
Our Ref:

Dear Rupy

West Sussex Joint Minerals Local Plan-Duty to Cooperate

Thank you for your letter of the 16th of September 2015 (appended to this reply), in which you requested a reply by 25th September 2015. I apologise for the delay in my reply, though I understand from our discussions that your authority would still value this late response. In response to your specific questions I can respond as follows:

Q1. The make-up of future aggregate supply in West Sussex to meet identified needs

Until the full AM2014 import export movements are known it may be considered premature to say that Kent will not take an increasing amount of minerals from West Sussex, as this data may show an increasing trend since the last relevant survey of AM2009. That said, it is considered unlikely that a marked change in trend of limited supply from Kent to West Sussex to that of a significant supplier (of sharp sand and gravel) will arise. It is considered that transportation costs and the existence of closer alternatives to Kent's landwon material would negate this change in the pattern of supply.

Katie Stewart
Director of Environment, Planning and Enforcement

Q2. West Sussex Mineral future Supply Options

Table 1: Important Minerals in West Sussex shows that where indigenous supply is limited such that a degree of importation is occurring. However, the matter is more acute in Kent, to meet requirements over the next few years it will be unable to supply its own needs of sharp sands and gravels. This is a matter that West Sussex will increasingly experience (though there is an expected surplus in 2032) and marine dredged materials will be increasingly important. Thus, there remains the question of how far the marine resource can be relied upon into the future in Kent, West Sussex and other mineral planning authorities experiencing relative depletion of their landwon reserves and replenishing resources. It is a question greater than a West Sussex and Kent supply relationship analysis. It is inevitable that the marine dredged resources will exhaust at some point, as they are finite in nature.

Crushed rock in Kent is in relative abundance, given its part of the crustal massive geology of Kent. Permitted reserves are extensive (48-49 million tonnes) thus it is not anticipated that any increased need in West Sussex will necessarily mean that Kent's requirements (in the order of 0.78 million tonnes per annum) will be significantly constrained. It is of note the Kentish Ragstone is unable to meet all specifications of crushed rock aggregate use.

Q3. West Sussex Mineral future Supply Options

Supply should usually be indigenous to be sustainable. The geology dictates if the available array of mineral resource is limited or abundant. If the predicted demands outstrip supply scenarios then importation and substitution is the only other option.

Q4. West Sussex Mineral future supply options-Plan Only for indigenous Needs

Kent has currently permitted reserves of 8.04 million tonnes (as of end of 2014) and a potential replenishment supply of 16.42 million tonnes overall (to 2030). Predicted requirements over the life of the Kent Minerals and Waste Local Plan (until 2030) are 17 times 0.601 tonnes averaged yearly production, thus totalling 10.20 million tonnes. Total surplus could (if all the replenishment reserves were to come forward) result in a surplus of 14.24 million tonnes. Thus there does appear to be a margin of flexibility available to Kent for its anticipated Plan period 2013-2030.

It is the case that a maintained landbank of at least 7 years of annual averaged (10 years) production (an NPPF compliant landbank) to be made available, year on year, amounts to 4.20 million tonnes. This will be achieved in Kent only if all the identified replenishment sites do indeed come forward. This is by no means a certainty. If West Sussex's requirements for soft sand do indeed increasingly have to be met via imports from Kent (thus not incurring new extraction or extensions to existing sites in the relevant National Park) Kent's position of anticipated surplus may well alter. It is reasonable to conclude that exhaustion may not occur in Kent if West Sussex's 3.724 million tonne supply shortfall has to be addressed by Kent's potential surplus

Katie Stewart

Director of Growth, Environment and Transport

of 14.24 million tonnes. Though this is indeed predicated by all the replenishment sites come forward over the life of the Kent Plan. This is not, as stated, a certainty.

Q5. West Sussex Mineral future Supply Options-Effect of decline of Exports of Soft Sand from West Sussex

Provided that the economics of demand were such that it would be commercially attractive to import significant volumes of soft sand from Kent, then the issue would be whether or not the unconstrained potential resources to supplement those currently permitted would be sufficient to meet Kent's projected needs (in terms of a simple landbank) **and** that of West Sussex. It appears that there would be sufficient material to achieve this, provided the identified sites (in the Kent Minerals Sites Plan Preferred Options Consultation, May 2012) were to come forward in a manner that gives assurance that sufficient supply will be available (see Section 10 Future Aggregate Supply Options in Kent to Maintain a Steady Supply of Aggregates to Meet Market Needs in Kent, of The Third Local Aggregate Assessment for Kent November 2015). This is not a certainty, and there is a degree of fragility in this potential supply chain model in that a significant amount of potentially replenishing material is tied up in one site (Shrine Farm, Postling, Site 97, 8.0 million tonnes).

Should the expected supply chain not come forward, then this would have a detrimental impact on ensuring supply is maintained in both in Kent and the modelled West Sussex areas simultaneously. It is also true that discussing these two area's soft sand requirements in isolation is essentially unrealistic; for example East Sussex has limited landwon reserves and potential available resources and thus this area's requirements may be, in part, from Kent.

Q6. West Sussex Mineral future supply options- Future security of Kent Export Supply

Kent has not experienced any significant changes to its import/export infrastructure that would limit future patterns or quantities of exported soft sands. It should be borne in mind that local needs may change over time in an unpredictable manner and this may have an impact on materials available for export. Given the assumption that local needs would be met first as, in practice, there is greater competitive commercial advantage to serve local markets primarily.

Q7. West Sussex Mineral future supply options- Market areas for Kent Soft Sand Sites

At this time a definitive answer as regards the markets served by Kent's soft sand extraction cannot be given. When the SEEWAP AM2014 report is available this will be clearer given that the import export balance with destinations will be detailed in the British Geological Survey report. The earlier SEEWAP AM2009 data is now rather old and should not be little weight in my view.

Katie Stewart

Director of Growth, Environment and Transport

Q8. West Sussex Mineral future Supply Options- Continuity of Soft Sand Supply

Kent has currently permitted reserves of 8.04 million tonnes (as of end of 2014) and a potential replenishment supply of 16.42 million tonnes. Predicted requirements over the life of the plan (until 2030) are 17 times 0.601 tonnes averaged per annum production, thus 10.2 million tonnes are required overall.

Total surplus could (if all the replenishment reserves were to come forward in a timely fashion over the life of the Plan) result in a surplus of 14.2 million tonnes. Thus there does appear to be a margin of flexibility available to Kent for the anticipated Plan period 2013-2030, and for Kent to have a wider role in supplying markets outside the County, subject to market demand. However, as indicated in response to Q5, a significant amount of the potential replenishment reserves are within one site (Shrine Farm, 8.0 million tonnes). This site is has been identified as a Preferred Options site, though it remains within the setting of the Kent North Downs AONB, a highly sensitive site in landscape terms. Before and further progress on the Mineral Sites Plan can re-commence an additional 'Call for Sites' consultation exercise will be undertaken, which will trigger a further assessment process.

If the County Council does not rely on the Shrine Farm reserve, then potential replenishment resources could, reduce from 16.42 million tonnes to 8.42 million tonnes, yielding a total potential reserve of 16.46 million tonnes. The Plan requirement of 10.2 million tonnes remains and thus the potential available surplus of 6.26 million tonnes may exist, rather than a surplus of 14.2 million tonnes. Kent's future role in the wider context of a net soft sand exporter may therefore not be as secure as it would at first appear. It would appear correct for West Sussex County Council to recognise the need to identify additional sites (Options SS1, SS2 and SS3) and not rely on a Kent import supply future scenario.

Options for Sharp Sand and Gravel-West Sussex Continuity of Supply

With regard to the options available to West Sussex County Council for the adequacy of future sharp sand and gravel aggregate supply, it is considered that if the NPPF places a priority in assessing and (if possible) securing a steady and adequate supply from landwon sources, therefore this should be pursued. If this is not possible, a sustainable approach is to increase substitution from secondary and recycled sources and then imports of such materials as marine dredged aggregates should be explored, thus affecting a steady and sustainable based supply of materials to the market.

Options for Secondary and Recycled Options

The NPPF caveats the requirement to take into account the contribution from this sector in overall aggregate supply "*so far as practicable*". Therefore, Options SRA1 and SRA2 do indeed appear practicable, in that they relate to planning policy. Options SRA 3 and SRA 4 relate more to how the private sector responds to policy,

Katie Stewart

Director of Growth, Environment and Transport

both locally and at the national scale, including the effect of primary aggregate taxation. Therefore, the objectives of Options SRA 3 and SRA 4 may be less appropriate to planning policy formulation.

Crushed Rock- Continuity of Supply in West Sussex

The lack of supply in West Sussex is understood. Therefore, crushed rock supply will have to be imported into the county's area. Kent has abundant reserves of limestone (Kentish Ragstone in the order of some 48 million tonnes) and it is not anticipated that an increase in demand from West Sussex will be likely to have a significant impact on the ability for Kent to meet its own needs.

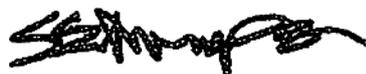
Marine Dredged Aggregates- Continuity of Supply in West Sussex

Kent County Council understands the imperative to safeguard all existing, planned and potential wharves in an area to ensure that the NPPF's requirement for marine dredged (and other materials) aggregates can be imported into an area to contribute to overall supply needs. Therefore, of the options West Sussex County Council are considering only Option W6 which seeks to *safeguard wharves in Eastern Harbour Arm at Shoreham (ARC Wharf, Hall Wharf, Tuberville & Penneys), Railway Wharf (Littlehampton); safeguarding of Britannia Wharf (and extension); and rely on 96ktpa general terminus capacity (2.29 mt capacity)* addresses the need for Plans to safeguard existing wharves, and those that there are planned and are potential wharves within the area.

The recent Examination Hearings into the Kent County Council's Minerals and Waste Local Plan 2013-30 (as modified) exposed the need to ensure that non-operational but potential wharfage is required to be safeguarded to in accordance with the NPPF. It is advocated that West Sussex County Council adopt the same approach.

I hope that clarifies the position, if you have any need of further information please do not hesitate to contact me again.

Yours sincerely



Sharon Thompson
Head of Planning Applications

Katie Stewart
Director of Growth, Environment and Transport

DtC09e – Response from Oxfordshire County Council (8 October, 2015)



INVESTOR IN PEOPLE



**OXFORDSHIRE
COUNTY COUNCIL**

ENVIRONMENT & ECONOMY

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Date: 8 October 2015

Direct line: 01865 815544

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Ref: S:\SPED\15.1.2\4.6
Please ask for: Peter Day

Dear Rupy,

West Sussex Joint Minerals Local Plan – Duty to Co-operate

I refer to your letter dated 16 September 2015 and the email from Eleanor Harman dated 28 September providing the footnotes. We are pleased to provide the following response as part of our obligations under the Duty to Co-operate.

Import / Export to / from West Sussex

Question 1

It is our understanding that currently there are no significant movements of aggregate minerals between West Sussex and Oxfordshire, nor have there been in the past. I confirm that the emerging new Oxfordshire Minerals and Waste Local Plan does not rely on or propose the supply of any aggregate minerals from West Sussex in order to meet needs in Oxfordshire.

West Sussex Minerals Supply Options

Question 2

In view of my response to question 1, the options for mineral supply in West Sussex do not directly affect Oxfordshire. Nevertheless we do have some concerns and would like to make the following comments on the options, which I hope you will find helpful.

The list of options at paragraph 2.1 includes 'Rail imported sand and gravel'. I am not aware of any movement of land-won sand and gravel by rail within the South East and, given the relatively small size and short duration of sand and gravel quarries in the region in relation to the investment involved in a railhead and train, and I assume therefore that this option relates to import of marine-dredged sharp sand and gravel from wharves. However, I note that this is not included in the specific options for sharp sand and gravel in paragraph 2.1.2 but that it is included in the specific options for soft sand in paragraph 2.1.1 (option SS4). I consider this to be unrealistic. It is my understanding that soft sand is not produced from marine-dredged sand and gravel, which would seem to be borne out by the non-inclusion of marine supply in the soft sand options SS1 to SS5. There are no current or prospective soft sand quarries in Oxfordshire

that could be rail linked and given the relatively small size and short duration of these operations, I believe that rail transport of soft sand is not feasible.

The list of options at paragraph 2.1 includes 'Road imported sand and gravel'. I note that this is not included in the specific options for sharp sand and gravel in paragraph 2.1.2, as there are already sufficient permitted reserves of this mineral, but that it is included in the specific options for soft sand in paragraph 2.1.1 (option SS5). Whilst this may be a deliverable option, it would depend on the availability of soft sand from quarries elsewhere and provision being made for this by other MPAs in their Mineral Local Plans. Your limit of 40 miles for road transport (which I consider to be a reasonable maximum) would exclude supply to West Sussex from soft sand quarries in Oxfordshire. However, if West Sussex was to be supplied with soft sand from other, nearer counties (particularly Hampshire, Surrey and Berkshire) this could have the knock-on effect of increasing demand for soft sand from Oxfordshire to supply markets outside the county. The Oxfordshire Minerals and Waste Local Plan is being prepared on the basis that there will not be a need to increase the export of soft sand above past levels and any pressure to do so would be of concern to this Council.

The specific options for secondary and recycled aggregate include increasing demand for this material by requiring its use in developments (option SRA4). I would question how deliverable this would be in practice through the development plan, in particular through the Minerals Local Plan.

The specific options for marine dredged aggregate include maintaining current total operational capacity within ports without safeguarding specific wharves (option W2). It is not clear how the total capacity would be maintained (safeguarded) without specific (or all – option W1) wharves being safeguarded.

In the absence of local knowledge, I am not able to comment on the other options but have no reason to think that they are not potentially deliverable.

Question 3

I have no suggestions to make for other options that should be considered.

Other comments

Paragraph 2.3.4 refers to 'demand forecasts for rail imported sand and gravel'. Given that the specific options for sharp sand and gravel do not include imports by rail, I assume this relates to imports of soft sand – in which case please see my comments above on option SS4.

The paragraph on 'Revised demand (excluding exports) that precedes Table 3 refers to a revised demand for soft sand being calculated, to exclude exports. The use of this approach to forecasting demand would be of concern to this Council if it were to lead indirectly to an increase in demand for production of soft sand in Oxfordshire for export (see my comments above on option SS5). We would expect to see a very clear justification for such an approach, based on evidence of lack of deliverable resources within West Sussex, in the event that this is used in the Minerals Local Plan.

I hope this response provides the information you need but please come back to me if you have any queries.

Yours sincerely,

A handwritten signature in blue ink that reads "Peter Day". The signature is fluid and cursive, with a long horizontal stroke extending from the end of the name.

Peter Day
Minerals & Waste Policy Team Leader

DtC10 – SEEAWP Minutes (10 November, 2015)

Technical Secretary: Richard Read BA. MRTPI

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Tel: 07786977547

Email: readplanning@btinternet.com

Minutes of the meeting of SEEAWP held on 10 November 2015 at Hampshire County Council, Winchester

Present

Tony Cook	Chairman – East Sussex		
Richard Read	Secretary		
Peter Day	Oxfordshire	Rupy Sandhu	West Sussex
Bryan Geake	Kent	Alan Everard	Tarmac
Lester Hannington	Buckinghamshire	Bob Smith	Hanson
Lisa Kirby-Hawkes	Hampshire	David Payne	MPA
Matt Meldrum	West Berkshire	Mark Russell	BMAPA
Chris Mills	Isle of Wight	Steve Cole	RBMR
Claire Potts	South Downs	Eamon Mythen	DCLG
Paul Sanderson	Surrey	Nick Everington	The Crown Estate

Welcome & Apologies

The Chairman welcomed everyone. Apologies were received from Gill King (Milton Keynes), Catherine Smith (Medway) Rebecca Williams/Sarah Ball (Windsor and Maidenhead), Mark Worringham (Reading), Richard Ford (Brett), Stewart Mitchell (Grundon), James Trimmer (PLA), Richard Linton (London AWP), Sue Marsh (EEAWP).

1 Minutes and Matters Arising from 27 October 2014 meeting

Minutes:

Paragraph 5.3 – the ‘track change’ in the draft Minutes to address a matter raised by DP on growth in aggregate sales was agreed.

Matters Arising not dealt with under other agenda items:

Paragraph 3.3 - MR queried if the discrepancy in the marine landings data in West Sussex's LAA had been resolved. RS reported he had discussed this with the operators and concluded there had been double counting and the data had been corrected

2 MPA/POS Guidance on Local Aggregate Assessments (LAAs)

2.1 The Chairman noted the publication of the Guidance since the last SEEAWP Meeting, and the press items with supportive quotes from MPA. DP reported that the recent workshop at Warwick on the Guidance was useful. A note is being prepared on proceedings to help inform changes to the 'live' Guidance. The notes will be forwarded to POS (Lonek Wojtulewicz)

3 Local Aggregate Assessments

3.1 Prior to the discussion on the submitted LAAs the Chairman asked about the progress on AM 14. EM reported that the AM steering group had met recently. The survey is on course and by the end of March 2016 a report fit for publication will be submitted to DCLG. However, ministerial clearance (James Wharton) is required, but it was not expected that this would cause undue delay.

3.2 The Secretary then introduced SEEAWP 15/04 that summarised and reviewed the LAAs so far. He explained that the conclusion from the last round of LAAs that the south east was making an appropriate contribution to aggregate supply regionally and nationally was still valid. SEEAWP 15/04 identified some specific issues with each LAA. The Secretary then introduced each LAA and the mineral planning authority representative commented before a general discussion which is minuted below.

3.2 Oxfordshire

RR questioned the limited reference to demand in the update provided. PD indicated that this would be addressed when the full LAA is produced.

DP considered the 'LAA 14 Provision Figures', Oxfordshire's alternative to the average sales indicator, to be a sensible approach. There is a need for common sense in the use of land banks as they are not a full reflection on demand. Demand forecasting at local level is difficult. Sales data is a proxy.

3.3 Buckinghamshire

RR highlighted the reference to significant infrastructure projects noted in the LAA.

LH explained that they had examined housing trends to assess expected growth but there was incomplete local plan coverage in the county.

DP welcomed the attempt at assessing productivity of sites (para. 5.5) as a reserve total does not always reflect what can be produced annually.

BS noted that restrictions on lorry movement at Bucks sites limits production.

PD reflecting this point remarked that Oxfordshire has a significant part of its reserve tied up in one site which limits annual production

SC noted that the potential for secondary aggregate from the new EfW may not be

reflected in Bucks sales as the 'raw' material may pass out of the county to an external processing site.

3.4 Surrey

PS noted that Surrey's resource limitations is well recognised, but new permissions this year mean the 7 years land bank is secure for the next 10 years. Sale of soft sand and gravel are higher this year. The county is looking at alternatives in order to provide 'headroom'.

AE queried when surrounding counties would need to take account of Surrey's difficulties.

The Chairman thought this was a difficult to answer, but something for future LAAs to consider.

DP highlighted that objectors were comparing approaches between Oxfordshire and Surrey particularly in relation to the mothballing of sites. Therefore, mpas need to be aware that these will be looked at by objectors.

DP compared Surrey's approach to Oxfordshire's and noted the former using their Mineral Plan apportionment as a basis for their Assessment. This gave more flexibility.

PD thought the longer term supply issue needs to be looked at in a wider geographic context as adjoining counties are stressed.

The Secretary highlighted that there was a common theme amongst LAAs particularly where reliance on alternative sources of supply is placing pressure on already constrained infrastructure.

3.5 East Sussex, Brighton and Hove and South Downs

TC said the land bank was going down fast so the emphasis is on monitoring the situation. The main resource is on the East Sussex – Kent boundary. Also the resource is constrained by candidate European designations.

3.6 West Sussex and South Downs

RS thought that the soft sand supply the big issue for the county.

CP reported that the soft sand study commissioned by the National Park Authority would be published in Spring 2016.

SC thought that soft sand was emerging as the perfect storm as there was no alternative supply. He thought there is an increasing demand for the material as asphaltting sand.

MR agreed there is a large increase in demand for sand.

DP expected West Sussex to look at different scenarios in their mineral plan preparation. RP agreed that would be the case.

There was a discussion on assessing demand for aggregates. The traditional measure of 60 tonnes of aggregate per house which included infrastructure was one approach. DP noted that the MPA assessment was that overall (GB) demand would soon be at the 2001 level. Per capita consumption is an alternative measure. The MPA will look to publish general data that can help inform the local situation. Also qualitative assessments are helpful.

AE thought that it was important that a planned long term consistent supply was the key to ensuring the appropriate investment is made.

NE thought that there is potential, which hitherto has not been exploited, for soft sand supply in the South and East Marine Plan areas. The Secretary raised the issue of chlorides in marine supplies of aggregate – an issue of the past – but NE asserted that the evidence did not support this concern. There was no ‘consumer’ resistance to sand dredged in the Bristol Channel and this experience could translate to the English Channel and North Sea.

NB Hyperlinks provided by Mark Russell on this issue:

http://www.bmapa.org/documents/marine_building.pdf

http://www.bmapa.org/documents/marine_concrete.pdf

PD thought that housing is an unreliable indicator of demand. Advice by Atkins to Oxfordshire was that population/aggregate sales was a better indicator.

3.7 West Berkshire

MM reported that the latest information indicates that the land bank in West Berks is now 8.1 years, but LAA recognises the need for a Mineral Plan. Nevertheless the sales average is down. There is a complication in that the rail heads show a distorted picture of sales as so much material is exported. Notwithstanding this, sales are the best indicator of demand.

3.8 Kent

BG said that in the supply of aggregates was in the longer term dependent on maintaining the infrastructure for alternative materials. This was demonstrated by the controversy over safeguarding of the wharf at Gravesend

NE emphasised the importance of maintaining sufficient capacity of wharfeage to ensure effective competition.

3.9 Hampshire, Southampton, Portsmouth, New Forest and South Downs

NE thought that there was sufficient marine resource available to meet Hants requirements but insufficient work in proving it.

L K-H explained that there is a constrained supply currently but a number of applications are expected shortly. It was noted that the wharves on the Itchen in Southampton are under regeneration pressures.

NE thought that options for alternative wharf infrastructure in Southampton are limited. LK-H said that additional criteria had been added in the recent Safeguarding SPD. This required all local authorities to consult HCC on planning applications that could have an effect on wharves, including by encroachment by incompatible land uses.

3.10 General

CM explained that the IoW LAA was underway and will available by the end of the year. The Secretary reported that Medway would be publishing a LAA shortly. MM announced that the Berkshire authorities intended to produce a joint LAA by the end of the year. Moreover Milton Keynes had submitted some information on aggregate sales. *NB The LAA has now been submitted and will be considered at the next meeting*

The Chairman said the Secretary would write to all mpas on the basis of the discussion on LAAs. PD remarked there were no overall SE England figures. The Secretary said that these could be summed once the missing LAAs are submitted and report would be made to the next meeting.

DP noted that all LAAs have a different approach so it would be useful to have a two page summary of the main statistics and consideration should be given to a template to ensure consistency. Also it would be useful to have, as suggested at the last SEEAWP meeting, changes from the previous year's LAA highlighted. Only Hants submitted their LAA on this basis. The Chairman suggested that this approach could be considered as part of the review of the POS / MPA LAA Guidance.

It was agreed that the Secretary would write to all the mpas that had submitted LAAs advising them of the above discussion

4 DCLG Update

4.1 EM listed the new ministerial team at DCLG with Greg Clark as the Secretary of State and James Wharton as the Minister responsible for minerals.

4.2 The 'new' Government's priorities can be summed up by the manifesto commitment; 'help you buy your own home' and protecting the environment. Specific policy commitments are:

- Deliver 'starter homes'
- Help/encourage self building
- Develop 'brownfield' sites first
- Protect national parks etc
- Encourage 'neighbourhood planning'
- Get local plans in place by early 2017. To note this commitment does not apply to mineral plans but does apply if minerals policies are subsumed in a Unitary Local Plan.
- Simplify planning
- Allow communities to have the final say on wind farms
- Shale gas to be developed safely

4.3 With regard to mineral planning the

- AWP's Annual Reports 2013 have been published on the DCLG website
- Annual Minerals Raised Inquiry (AMRI) 2013 statistics were published in February 2015
- AMRI 2014 statistics would be published by end of this year

4.4 The AWP contracts had only just been finalised after a long complicated tender process involving 25 tenders for the 9 regions. The AWP administration is now:

- Hampshire CC for the London and South East England AWPs
- David Jarvis Associates for the South West AWP
- Central Bedfordshire for East of England AWP
- Northumberland County Council for North East England AWP
- Urban Vision for North West, West and East Midlands and Yorkshire/Humberside AWPs

The Chair for the South West AWP is to be finalised following a resignation. The contracts are until 2017/18 with a break clause at 31 March 2016 subject to the current Comprehensive Spending Review.

4.5 In discussion with stakeholders it is recognised that the four yearly national AM survey and the AWPs are critical to MASS and the status quo has been advocated. The impact of the Comprehensive Spending Review will be known late November/early December

4.6 EM said that the 'Red Tape Challenge' on minerals was being conducted by BIS and the evidence they had collected will be published in due course

4.7 EM noted that there was a lack of consideration of mineral issues in the submissions for devolution but it was indicated that this would be subject to consideration if proposals were taken forward.

4.8 EM explained that Government looked to delivering its priorities by 'deals' or contracts with local government, business and other interests. The AWP contracts can be seen in that way.

5 SEEAWP Work Programme & Priorities

5.1 The Secretary introduced SEEAWP 15/05 which recommended that notwithstanding the uncertainty over the future of AWPs, AM15 needed to be progressed early in the New Year. The Secretary also referred to the established cycle of three meetings a year.

5.2 PD raised the issue of rail head and recycling sites data missing from AM14. However, it was evident that some mpas had carried out surveys of these facilities, but some not. Accordingly the Chairman asked the Secretary to write to all mpas to clarify the matter. Furthermore those mpas that had not surveyed rail heads and recycling facilities for 2014 data would be asked to do so while AM15 was being conducted.

5.3 DP requested that all the LAA key statistics – sales for each mineral, average (10/3year averages), land banks in years, sales of alternative supplies – should be collated for all of the south east in a 'live' document. This could easily demonstrate the AWP area performance, and, the data would contribute to the national picture.

5.4 EM explained that in connection with gaining an overall national picture there would be an AWP secretaries meeting held shortly and NACG called in the New Year.

- 5.5 It was agreed that;
- Priority be given to carrying out AM 15
 - There would be three meetings a year and
 - The Secretary would undertake a summary collation of all LAAs when they were available.

6 Strategic Spatial Planning Officer Liaison Group (SSPOLG)/London Plan

- 6.1 It was agreed to consider items 6 & 7 on the agenda together
- 6.2 The Chairman explained that at the recent SSPOLG meeting consideration was given to aggregate demand issues in London particularly in relation to infrastructure. The matter of wharves safeguarding policy was considered critical. Also note was taken of the forthcoming Mayoral election which might have an impact on policy. The GLA wants to liaise further on forward planning for minerals matters in relation to the London Plan.

7 South Marine Plans

- 7.1 The Secretary explained that the MMO are expected to produce the draft plans by end of the year/early next year and submit them to Defra. However, there will be a long internal process within Government before they are published for comment. The MMO would like to give a presentation to a joint meeting of LAWPs and SEEAWPs in the meantime.
- 7.2 The Chairman explained his role on the Sustainability Appraisal Steering Group and that that the Marine Plan process was different to the familiar terrestrial plans.
- 7.3 MR thought that the preliminary draft mirrors the East Marine Plans but the South Plans were different in that there was a lot of detail. Also a new policy (AGG 4) had been introduced that was problematic which might not survive the process.
- 7.4 NE circulated The Crown Estates 'Marine Aggregates Capability and Portfolio 2015' and MR circulated the 17th Annual Report by MPA/BMAPA/Crown Estate on Marine Aggregate Extraction 2014 (http://www.bmapa.org/issues/area_dredged.php). The Chairman thanked them both.
- 7.5 MR drew attention to the new 'right' for marine coastal local authorities to request a 'call in' by the Secretary of State of major proposals and license applications within 16 miles of the coast.

8 Date of Next Meeting

- 8.1 It was agreed that the next meeting will be a joint one with LAWPs to receive a presentation on Marine Plans at the Crown Estates offices in London. The Secretary will liaise with NE and MMO about a date in March/April which will be announced in due course
- 8.2 It was also agreed that the subsequent meetings for 2016 would be fixed in diaries by the Secretary and Chairman. The Secretary would also investigate meeting rooms in

London but Hampshire County Council's Offices would be the reserve venue.

Actions

- 1 **The Secretary to write SEEAWP's views to all mpas that had submitted LAAs**
- 2 **DCLG to be encouraged to arrange meetings of AWP Secretaries and a NCG**
- 3 **The Secretary would undertake a summary collation of key LAA statistics when all SE LAAs had been submitted**
- 4 **The Secretary would establish which mpas had surveyed rail heads and recycling sites as part of the AM14 survey**
- 5 **AM15 forms (AM14 forms for rail heads and recycling sites where appropriate) would be circulated early in the New Year and mpas would be requested to undertake the survey as a priority.**
- 6 **The Secretary liaise with The Crown Estate (NE) and other relevant parties regarding arrangements for a joint LAWP/SEEAWP meeting in March 2016. The MMO would give a presentation on the South Marine Plans at the meeting**
- 7 **The Secretary and Chairman will establish meeting dates and venues for 2016**

DtC11 – SEEAWP Letter (20 November, 2015)

Technical Secretary: Richard Read BA, MRTPI .

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Email: readplanning@btinternet.com

Rupy Sandhu
Planner, Minerals and Waste Policy
West Sussex County Council

20 November 2015

Dear Rupy

West Sussex and South Downs Draft Local Aggregate Assessment (LAA)

SEEAWP thanks you for consulting its members on the joint draft LAA for 2015. At its meeting on 10 November this was one of eight LAAs considered at the meeting.

The evidence from the LAAs 2015 so far submitted to SEEAWP clearly indicates that the south east was continuing to make an appropriate contribution to aggregate supply regionally and nationally.

During the discussion at the meeting some general points arising from the LAAs were made. An issue was that south east England would in due course depend increasingly on alternatives to local extraction. This matter stressed the need to safeguard appropriate infrastructure. Additionally some mineral planning authorities would require more supply from its neighbours and this need to be taken into account in mineral plans. Finally, it was recognised that the supply of soft sand was becoming a challenge as significant proportion of the resource is within designated land.

It was also agreed that once all the LAAs had been submitted a short summary would be provided by the Secretary on all the key statistics to provide an overall picture for the south east of England

Additionally some specific comments arising from your authority's LAA were recorded in the Minutes that have now been circulated. I trust that these will be taken into account by you when you draft your Authority's LAA for next year.

Nevertheless, the West Sussex, and South Downs Joint LAA was agreed. .

Yours sincerely

Tony Cook

SEEAWP Chairman

DtC12 – Summary of LAA Responses (November, 2015)

Summary of Local Aggregate Assessment (2016) Responses

Consultee	Section	Comment	WSCC/SDNPA Response
Crown Estate	General Comments	Updated capacity and portfolio document available with updated figures (http://www.thecrownestate.co.uk/news-and-media/news/2015/marine-aggregates-capability-and-portfolio-2015-released/).	Figures amended.
Crown Estate	2.2.4	<p>“There are licences allowing the extraction of 9.7 million tonnes per year”. This is now 7.8 million tonnes per year.</p> <p>“and there is currently the permitted capacity to supply an additional 6.3 million tonnes per year”. This is now 4.8 million tonnes per year.</p> <p>“If approved, five further dredging applications in this area could also deliver permits for an extra 2.25 million tonnes per year”. This is now “If approved, four further dredging applications in this area could also deliver permits for an extra 1.9 million tonnes per year”</p> <p>The source can change to “The Crown Estate (2015). Marine Aggregates Capability and Portfolio 2015”.</p>	Figures amended
Crown Estate	Box on page 27	“9.7mt of material is permitted for extraction per annum from licences within the ‘South	Figures amended

Summary of Local Aggregate Assessment (2016) Responses

		Coast Region' with capacity to supply an additional 6.3 million tonnes per year." This is now "7.8 mt of material is permitted for extraction per annum from licences within the 'South Coast Region' with capacity to supply an additional 4.8 million tonnes per year."	
East Sussex County Council	General Comments	No formal comments to make on the LAA but note of meeting re. Statement of Common Ground may cover some general discussion about safeguarding of wharves.	Comments noted.
Hampshire County Council	General Comments	<p>No further comment to make in relation to LAA.</p> <p>Comments on forecasting aggregate demand:</p> <p>Evidence base for the Hampshire Minerals and Waste Plan (2013) addressed the subject of demand forecasting for aggregates.</p> <p>Comparison of net housing completions and aggregate demand not considered to be reliable.</p> <p>HCC's 2015 LAA provides a 3 year forecast of housing completions within the county which provides a crude extent of possible aggregate demand based on forecasting of</p>	Comments noted

Summary of Local Aggregate Assessment (2016) Responses

		<p>housing delivery.</p> <p>Formula for calculating quantity of aggregates for a 3 bed house developed by a SEEAWP member. Only included amount of mortar and excluded use of sand and gravel.</p> <p>Hampshire's LAA includes permitted and planned developments to help provide information on future demand.</p> <p>One authority looking at using GDP as a proxy for future aggregate demand.</p>	
Coast to Capital LEP		No specific comments	Noted
Natural England		<p>Note that there is a need to find sites for sand extraction and look forward to early involvement in considering options.</p> <p>Should include a map showing the National Parks and AONBs and international and national habitats to flag up constraints.</p>	<p>Map A1 shows the South Downs National Park and AONBs. Map 3 will be amended to include international, national and local nature designations.</p>
Surrey County Council	General Comments	No comments to make in terms of alternative methodologies for assessing future demand.	Comment noted.
Surrey County Council	Para 2.1.12	I'd query the assertion made in the second sentence that links between sales and economic growth may not be clear cut	Text amended to reflect the comments

Summary of Local Aggregate Assessment (2016) Responses

		<p>because although this is likely to be true, I don't think this is supported by the evidence presented. The para mentions that the period between 2004 and 2013 covers the period before and after the economic downturn. However, the ONS has reported that the recession ended in the second quarter of 2013.</p> <p>Hence, the recession will impact on the 2013 sales figure, not only because a significant part of 2013 included a period of recession but also because it would be unreasonable to assume that sales would recover much in the period (between 6 and 9 months) immediately following the deepest recession since records began in 1948. This is particularly the case bearing in mind how slow the recovery has been in comparison with other previous recessions. In saying that, I accept that there was initially strong growth in the construction sector following the recession which will have bolstered sales but not significantly when compared to pre-recession levels.</p> <p>It would therefore be more accurate to say something along the following lines:</p>	made.
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Summary of Local Aggregate Assessment (2016) Responses

		"... between 2004 and 2013 which covers the period before and during the economic downturn. Despite the increasing levels of economic growth recorded between 2004 and 2007, sales in the South East fell by 18% during this same time period. This indicates that the link between sales and economic growth may not be clear cut."	
Surrey County Council	Para 2.1.15	I'm not sure that this is relevant in terms of assessing the demand for minerals so I'd be inclined to delete this paragraph. Clearly this is a significant (but not absolute) constraint on the ability to meet future demand so I would only refer to this in the relevant section where you discuss your available options for meeting future demand. NB: I subsequently note the related comment in para 2.1.24 but still come to the same view. I accept that this constitutes 'other relevant local information' in the context of the NPPF, but not in the context of para 2.2.15 for the reason stated.	Comment noted.
Surrey County Council	Para 2.1.17	Might it be helpful to quantify in the main text the time period over which the projected / expected growth highlighted in Assumptions 1 and 2 is anticipated to occur. Also relevant re para 2.1.20 Assumption 1,	Time frame included in tables and text to clarify.

Summary of Local Aggregate Assessment (2016) Responses

		and para's 2.2.12, 2.3.3, 2.4.5 and 2.4.6 Assumptions 1 and 2.	
Surrey County Council	Para 2.1.21	Is there a contradiction between this para which says that "As road maintenance or improvement works do not involve the use of soft sand, ..." and para 2.1.36 which acknowledges that "soft sand is most commonly used in mortar and in asphalt for road construction and repair" ?	Text amended to remove contradiction.
Surrey County Council	Para 2.1.37	<p>Suggest moving final sentence of bullet two to the end of bullet one given bullet one concerns Surrey and bullet two concerns Hants. Ref to East Sussex landbank in bullet 4 of 31 years could imply a substantial permitted reserve unless this is quantified by saying what the actual permitted reserve is as I'd imagine it to be very small.</p> <p>Re bullet 5, I'd be interest to know how the City of London Corporation became aware of the soft sand issues being considered in West Sussex and whether this was from direct contact from yourselves or did they simply pick up on a general formal consultation made available on your website ? I can't recall Surrey having any direct</p>	<p>Bullet point moved so it relates to Surrey County Council.</p> <p>Landbank information taken from ESCC's LAA but some further clarification provided.</p> <p>City of London Corporation was contacted through our early engagement.</p>

Summary of Local Aggregate Assessment (2016) Responses

		contact with them previously although I could be mistaken.	
Surrey County Council	Land-Won Sand and Gravel Summary - Page 21	In relation to imports and exports, query bullets one and two which appear to suggest that 85% of land-won and marine sand and gravel sales were consumed within West Sussex and 55% (produced) were exported? This may need clarifying.	Clarification provided.
Surrey County Council	Para 2.2.15	This refers to discussions with operators in 2008/09 indicating that aggregates delivered to wharves and railheads in W Sussex generally travel between 25 and 50 miles. If you obtain any more up to date information on such travel distances in future from your operators then this would be of interest. Reading this para in conjunction with the final sentence of para 2.3.1 which refers to deliveries within a 20 mile radius (which admittedly are likely to include journeys over 20 miles as roads are not straight) and the second bullet included in the grey box at the bottom of page 30 entitled Rail Imported Sand and Gravel Summary, would there be merit in referring to separate travel / haulage distances from wharfs and railheads if sufficient information exists as the information provided in these 3 sections	Further details will be included if evidence gathering reveals any additional information.

Summary of Local Aggregate Assessment (2016) Responses

		indicates a disparity between the two ?	
Surrey County Council	Table 5 / Figure 4	Significant drop in railhead imports in 2014 is a surprise. If there is a known reason for this it might be helpful to refer to this.	Comment included explaining why there was a sudden drop in 2014.

DTC13 – SEEAWP Minutes (14 July, 2016)

Technical Secretary: Richard Read BA. MRTPI

Address: c/o Strategic Planning, Hampshire County Council, First Floor, Ell Court West,
The Castle, Winchester, SO23 8UD

Tel: 07786977547

Email: readplanning@btinternet.com

Minutes of the meeting of SEEAWP held on 14 July 2016 at Hampshire County Council, Winchester

Present

Tony Cook (TC)	Chairman		
Richard Read (RR)	Secretary	Dustin Lees (DL)	Surrey
Ross Crayford (RC)	Medway	Natalie Chilcott (NC)	South Downs NP
Matt Meldrum (MM)	West Berkshire	Stewart Mitchell (SM)	Grundons
Peter Day (PD)	Oxfordshire	Richard Ford (RF)	Brett Group
Bryan Geake (BG)	Kent	Helen Hudson (HH)	Cemex
Sarah Iles (SI)	East Sussex	David Payne (DP)	MPA
Rupy Sandhu (RS)	West Sussex	Rob Dance (RD)	Raymond Brown
Melissa Spriggs (MS)	Hampshire	David Norminton (DN)	Hanson
Miranda Petty (MP)	SEEAWP Secretariat	Nicola Clay (NC)	Crown Estate

1 Welcome & Introductions

The Chairman welcomed everyone, especially those attending for the first time. It was explained that Rob Dance was attending on behalf of Steve Cole of Raymond Brown who wanted to raise the issue of soft sand supply. It was agreed that this subject would be added to the agenda.

2 Apologies

Apologies were received from Laura Davidson/Gill King (Milton Keynes), Chris Mills (Isle of Wight), Sue Scott (Bracknell Forest), Emily Brown (Buckinghamshire), Kate Rhodes (East Berkshire Unitaries), Ian Blake (South Downs), Alan Everard (Tarmac), Steve Cole (Raymond Brown), Mike Low (Sumerleaze), James Trimmer (Port of London Authority), Julia Webberley (Sec. for SWAWP), Sue Marsh (Sec. for EEAWP),

Eamon Mythen (DCLG)

3 Minutes and Matters Arising from Meeting 10 November 2015

Minutes:

- PD – Paragraph 3.2 deleted text should include the words ‘as they’.
- Minutes were agreed.

Matters Arising not dealt with under other agenda items:

- None.

4 Isle of Wight/Milton Keynes LAA 2015 – SEEAWP 16/01

Discussion:

- Noted the report’s recommendation had been agreed by the Chairman outside a meeting.
- Discussion on the appendix to 16/01 and that the table should include a column for the LAA provision figure. NPPG states that the landbank should be ‘based on latest annual LAA’.
- Noted that the AM report should reflect this in the landbank calculations.
- Still awaiting LAAs from the Berkshire Authorities (West Berkshire submitted LAA 2015 last year) and Medway – see notes at end of Minutes.

Agreed that the recommendation for 16/01 be confirmed.

5 Additional LAA guidance – SEEAWP 16/02

Discussion:

- Basis of LAA figures used for landbank calculations vary - useful to be consistent.
- Helpful to show trends for each variable and TC suggested a dashboard would be advantageous to clearly display trends to go with the proposed table. The IoW LAA was referenced as an example.
- Capacity variable should include land-won aggregates. It would help if the productive capacity of aggregate quarries was added as a question on the AM survey form. PD noted this used to be on the form in the past. The AM survey form will be discussed at next meeting.
- Consistent guidance on infrastructure/construction projects would be useful. Housing projections were agreed as being helpful as well as ‘larger than local’ projects i.e. those that affected more than the local area. Essentially LAAs need to pick up projects and programmes that create more than ‘business as usual’

demand for aggregates.

- It was also suggested that the summary table should be produced by each mpa in Excel to assist the Secretary in the regional collation.

Agreed that the recommendation for 16/02 be agreed subject to above points.

6 Aggregates Monitoring Report 2014/2015 – SEEAWP 16/03

Discussion:

- BGS – waiting for final approval to publish the ‘Collation of the results of the 2014 Aggregate Minerals survey for England and Wales’ – see notes at end of Minutes.
- A revised draft of the report including track changes to show alterations will be circulated for further comments.
- The mpas asked that main issues be highlighted, which will be followed up by future AWP business.
- SM thought paragraph 9.3 (re. LAAs) indicates that a Plan will solve all issues but this may not be the case. It was suggested that this was reworded.
- Discussion on recycled and secondary aggregate data reliability. It was noted the sales are in line with national data – 30% of aggregate sales.
- MM raised that in future he would like to see Berkshire separated in to the mpa areas. MM is also discussing this with BGS for the national collation.
- RS would like to see figures for SDNP be clarified as BGS do not report for the Park. SDNP figures may be included within the County areas but should be noted underneath the table. This matter needs addressing outside the meeting.
- RD raised the issue of soft sand in the South East as there is not enough resource available for extraction. RF said Brett lost an appeal in one case as soft sand did not have a landbank separate from sharp sand and gravel, which masked the need for soft sand. It was agreed that soft sand is an issue within the region which should be addressed.
- NC said that a tender round is due in the autumn for marine aggregate extraction licenses.
- Other comments or inclusions wanted in the report – incorrect/revised information had been noted – should be submitted to the Secretary (RR).

Agreed that Secretary will circulate a revised AM report taking into account the matters discussed and any comments made in the meantime. The Chairman will subsequently sign off the report for submission to DCLG.

7 **Marine Plans**

Discussion:

- There has been a call for evidence by the Marine Management Organisation (MMO) for the South East Marine Plan. The plan area covers the tidal Thames up to high water mark (NB this overlaps the land use planning jurisdiction that ends at low water mark), Thames Estuary and the inshore waters off Essex, part of Suffolk and north Kent.
- It was suggested by RR that the SEEAWP (and LAWP) should respond to the above by emphasising the importance of the marine aggregate resource and wharves for the supply of aggregate.
- The Port of London have produced a 'Vision for the Thames' and the GLA are also looking at visions.
- DP said the MPA have written to the Mayor regarding the importance of wharves which will need to be considered as part of any London Plan Review.
- MPA will also be highlighting the importance of wharves and rail heads as part of a campaign.

8 **Government Update**

- DCLG not present.

9 **Soft Sand**

Discussion:

- There is not sufficient distinction being given to the provision of soft sand and sharp sand and gravel.
- The availability of soft sand in designated areas is an issue and this is leading some mpas (Essex and West Sussex) to rely on others for their soft sand supply.
- Other mpas such as West Berkshire have granted permission for soft sand extraction in AONBs when an exceptional circumstance has been demonstrated.
- Need to look more widely at soft sand in the South East and recognise that it is an issue.
- MPA suggested the top three issues for the south east included soft sand provision, safeguarding of wharves/rail depots and the provision of alternatives.

Agreed that soft sand should be given more prominence in the AM report.

10 AoB

Both TC and RR explained the main business on the UK Minerals Forum – involvement in the MPA/CBI preparation of a UK Minerals Strategy and the LAWP – the review of the London Plan.

11 Chairmanship

Agreed that Tony Cook continue as Chair for the term of the AWP Contract – Spring 2018.

12 Date of next meeting

Monday 21st November 2016 in Winchester.

Actions

- 1 LAA Guidance - Secretary issue an updated Table and Notes for inclusion in subsequent LAAs and advise POS/MPA of the SEEAWP approach.
- 2 The LAAs 2016 are to be submitted to Secretary by mid-October for discussion at the next SEEAWP meeting.
- 3 Secretary to discuss presentation of SDNP data in the AM report.
- 4 Secretary to circulate a revised AM report for comment and prepare a final version for the Chairman to sign off.
- 5 Secretary to respond to MMO call for evidence for the South East Marine Plan.

Notes

- 1 Subsequent to the meeting RC explained that Medway had completed an LAA as part of the Council's Annual Monitoring Report (AMR) and asked for advice if this was acceptable approach in the future. The email response was copied to all SEEAWP members.
- 2 On the 1 August the BGS sent all AWP Secretaries tables from the AM 2014 survey that will not be published illustrating aggregate sales information by 'sub regional' destination. The tables are prepared to facilitate mpa preparation of the LAAs 2016. The spreadsheets have been sent to the mpas.
- 3 An AWP Secretaries meeting is being organised for October – it is anticipated some outstanding issues arising from LAAs and AM surveys/reports will be discussed then.
- 4 During the Spring, Gloucestershire County Council consulted SEEAWP on their current LAA. The Secretary responded in consultation with the Chairman and advice from Oxfordshire. The principal issue is the decline in aggregate sales that are sent to the south east region from Gloucestershire and apparent increase in reciprocal movements. The concern was acknowledged and Gloucestershire would address the

issue in their next LAA.

DRAFT

DTC14 – SEEAWP Minutes (21 November, 2016)

Technical Secretary: Richard Read BA. MRTPI

Address: c/o Strategic Planning, Hampshire County Council, First Floor, Ell Court
West, The Castle, Winchester, SO23 8UD

Tel: 07786977547

Email: readplanning@btinternet.com

Minutes of the meeting of SEEAWP held on 21 November 2016 at Hampshire County Council, Winchester.

Present

Tony Cook (TC)	Chairman		
Richard Read (RR)	Secretary		
Emma Shillabeer (ES)	Secretariat		
Melissa Spriggs (MS)	Hampshire/ Central & Eastern Berkshire		
Ross Crayford (RC)	Medway		
Bryan Geake (BG)	Kent		
Laura Davidson (LD)	Milton Keynes	Sarah Iles (SI)	East Sussex
Chris Mills (CM)	Isle of Wight	Rupy Sandhu (RS)	West Sussex
Matt Meldrum (MM)	West Berkshire	Katelyn Symington (KS)	Surrey
Peter Day (PD)	Oxfordshire	Emily Brown (EB)	Buckinghamshire
Helen Hudson (HH)	CEMEX	Bob Smith (BS)	Hanson
David Payne (DP)	MPA	Alan Everard (AE)	Tarmac
Stewart Mitchell (SM)	Grundon	Steve Cole (SC)	Emerald
Mark Wrigley (MW)	Crown Estate		
Clare Kavanagh (CK)	Marine Management Organisation		
Nicole Yeomans (NY)	Marine Management Organisation		

1. Welcome and Introductions

The chairman welcomed everyone, especially those attending for the first time and particularly Clare Kavanagh (CK) and Nicole Yeomans (NY) from the Marine Management Organisation (MMO).

2. Apologies

Apologies were received from Richard Ford (Brett Group), Mark Russell (MPA) and Eamon Mythen (DCLG).

3. Minutes of previous meeting – 14 July 2016

All comments on the draft minutes had been incorporated and the revised minutes were agreed. The final version would be published on the website.

4. Local Aggregate Assessments (LAAs) 2016

The Secretary introduced SEEAWP 16/04. All the LAAs – only Oxfordshire had been unable to submit one - are acceptable and can be approved, but there are lessons for the next round. Particular discussion points concerning 16/04 were::

- Para 3: The QA checklist from the POS/MPA Guidance on LAAs and used in the appendix of the IOW LAA, would usefully be included in all future LAAs.
- Para 4: Some LAAs included confidential data. This could be avoided if three-year sale averages were used instead. There was no objection by SEEAWP members to this approach.
- Para 5: The possibility of joint LAAs was raised.
- Para 6: The 'Key Facts' tables proved to be very useful summary. The definition of the 'Trend' column in the Table was discussed. It was agreed that 'current' sales should be compared with average sales to indicate positive, neutral or negative trend and illustrated with coloured 'arrows' e.g. IoW LAA. It was suggested that the 'commentary' within LAAs needed to be stronger as this is the key to an 'assessment'.
- Para 8: The LAAs show that land banks are eroding quickly. Some LAAs need to give more focus on potential reserves in mineral plan allocations and future resources to provide a picture beyond the life of the land bank.
- Para 10: The LAA Provision Rate in some LAAs needs further justification – see PPG advice.
- Para 11: More discussion on the vulnerability or otherwise of infrastructure – depots and wharves - would be helpful.
- Para 12: Some of the LAAs relied on future supply in the longer term from neighbouring mpas – such cases need evidence that this could be achieved.
- Para 13: There needs to be a common approach or methodology for assessing recycled and secondary data. It was suggested the South East Waste Planning Advisory Group (SEWPAG) would be a good forum for further discussion. The next SEEAWP meeting would include the issue on the agenda.
- Para 14/15: The definition of capacity needs to be addressed. The AM 2016 survey has requested this information – see SEEAWP 16/05.
- Para 16: There has been an overall increase in crushed rock sales and the scope for a general increase in supply from this source was discussed. Reference was made to the variations in quality of material and end uses, and the cyclical nature of demand for that produced in Oxfordshire and Kent. The conclusion was the crushed rock resources in the South East had only limited scope.
- Para 17: It was suggested that LAAs should address demand more fully and examine 'stress testing' scenarios to take into account a likely large increase in infrastructure spending.
- Para 18: Because of data confidentiality it is difficult to get a regional spatial picture of soft sand supply. Nevertheless this is being addressed by the mpas – also see minutes below..

The main headlines of each LAA was discussed:

- **Hampshire:** Key headlines included an increase in marine sales and a decrease in land-won sales. The import of aggregate from rail depots remains the same and there was a reported decrease in recycled aggregate. There has been no change in

wharf capacity. There was a new planning permission granted at Forest Lodge Home Farm for a small SS+G site although this was not included in the draft LAA, due to timing of the approval. The sand and gravel landbank is just over 7 years with soft sand land bank at 5.4 years. There are no current issues with total aggregate supply and available capacity.

Comments: It was questioned why silica sand data is not identified separately from soft sand. The safeguarded sites shown in figure 1 were questioned. It was suggested that there should be information regarding IBA as Hampshire is an important producer of this secondary aggregate. It was suggested that one of the titles in Table 11 should be amended to 'planned provisions'.

- **Medway:** Key headlines included no major updates, imminent opening of Kingsnorth (Lafarge) Quarry which should generate 100,000t pa of SS+G. Marine sales have increased.

Comments: It was suggested that the sand and gravel sales shouldn't be recorded as '0' even when the sales are low (under 0.1mtpa). It would be best to record a value, no matter how small otherwise it may indicate there is no supply at all.

- **Surrey:** Key headlines included an increase in recycled aggregates and a new permission for a site extension (the last outside of the AONB) that will increase soft sand supply.

Comments: DP discussed the analysis of demand met by imports.

- **Milton Keynes:** Key headlines included a limited supply of SS+G due to only three active quarries, but proposed there are proposed additional sites in the mineral plan. Currently not enough local supply and the plan will address this.

Comments: Milton Keynes will update the import/export figures from the latest AM 2014 data.

- **Isle Of Wight:** Key headlines included an increase in SS+G which resulted in a 50/50 balance between source of marine won and land won SS+G indicating a lesser reliance on imports. A spike in secondary recycled aggregate was recorded which CM will research further. There is an ongoing capacity issue. The three- year and 10 - year average show different trends, the three-year average is higher than the 10-year average.

Comments: There was one clarification of figures raised.

- **West Sussex:** Key headlines include the same issue as last year, a shortfall in SS due to the SDNP constraint. SS+G sales have fallen but there is a high land bank of 71years, the majority of which is within one site which hasn't yet started production. There is sufficient capacity for wharves/rail depots.

Comments: Table 5 – a large amount of sales data has an unknown destination according to the BGS tables. BS explained that this issue originates from the large amount of 'collect' sales at West Sussex's main site which site staff are not able to allocate to a specific destination. West Sussex are aware that some sales will have been double counted (at Shoreham), but have contacted the Crown Estate to get landing data to reduce this issue.

There is a lack of conclusion in the LAA and noted that within the exec summary, one figure reads XX which needs amending.

- **East Sussex:** East Sussex have prepared and submitted the LAA before the release of the AM report, so it will be updated. Headlines include the SS+G trend to continue, a decrease in marine imports, but this will increase significantly. There is only one SS site which is nearing the end of its life . A review of mineral policies has been committed to.

There were no comments.

- **West Berkshire:** Key headlines included a slight decrease in aggregate sales and slight decrease in recycled sales, high imports from rail heads and a land bank of 9.2 years. Reserves of SS are all within one site.

Comments: West Berkshire will continue to produce their own LAA as critical evidence for the emerging mineral plan.

- **Central and Eastern Berkshire:** Covers area of 4 unitary authorities; Bracknell Forest, Reading, Windsor and Maidenhead and Wokingham (Slough currently not included). Hampshire CC will be producing the LAA for these areas during the plan making process. The LAA was produced by Atkins and included the whole Berkshire area (including West Berkshire). Headlines included a decrease in S+G sales, a land bank of 11 years, crushed rock is sourced from Somerset and an increase in rail depot sales. There are issues with recycled aggregate data.

Comments: It was suggested that the LAA should be written for the next year for the plan area of these four unitary authorities.. MS outlined the Central & Eastern Berkshire Joint Minerals & Waste Plan timetable. The LDS is currently being agreed by the constituent mpas..

- **Buckinghamshire:** Key headlines included an increase of S+G sales, 9 year reserve which is due to run out in 2018 at the current rate. Net imports of SS+G.

There were no comments.

- **Kent:** Plan was adopted in July 2016. LAA is similar to last year. Headlines include an increase in SS reserves, a decrease in sales, a land bank higher than 7 year. SS+G reserve base has increased due to re-surveying, however the land bank is not met for SS+G. Crushed rock data has confidentiality issues so there is no data. Imports have increased, but a wharf operated by Cemex has recently been lost at Dover, due to the western dock re-development scheme.

Comments: A few typos need addressing. Kent is the only mpa to 'model' future demand, however DP queried the results as the methodology is only effective at the national scale..

- **Oxfordshire:** Apologised for no LAA explaining priorities are elsewhere. Oxfordshire will provide key figures and any narrative possible. It is believed the figures would be similar to the previous years LAA.

5. **Aggregate Monitoring Survey 2016**

The timetable for the Aggregate Monitoring Survey was outlined by the Secretary
:

1. Questionnaires out to mpas by Christmas
2. Mpas to circulate to operators early January
3. Operator returns to mpas by end of March
4. Mpas to send collations – which should include confidential data (it will be redacted later) – to Sec. by end of April
5. Sec to circulate draft tables (with potential redactions highlighted) for verification to mpas whom shall respond by end of May
6. Draft AM report for SEEAWP in July

RR emphasised the importance of the inclusion in the initial returns by mpas of all the data including confidential data, which should be highlighted, so regional totals can be validated. The draft AM report will be redacted to protect confidential data. .

RR has circulated the recent BGS mpa destination tables that provide a split of sand and gravel into land-won and marine.

SEEAWP 16/05 was discussed with particular reference to the following:

Capacity: AM 2016 survey will include a question about capacity.

Tables: Currently the tables in the AM report do not split soft sand from sharp sand and gravel as much as it could usefully be presented. The Secretary will produce a report at the next meeting illustrating a revised table format.

Areas: Some of the smaller mpas have many 'c' (confidential) entries in their tables, which doesn't add value from a regional perspective. It is suggested that for the purposes of the AM report there should be some groupings i.e. West Berkshire and Central and Eastern Berkshire, Buckinghamshire and Milton Keynes, Kent and Medway. A report – see above - to the next SEEAWP will illustrate the suggested table format.

6. Aggregate Working Parties' Secretaries Meeting

Notes of the Secretaries Meeting were provided in SEEAWP 16/08.. The meeting covered the subjects of the AWP contract, LAA practice, AMR discussion and the NCG.

The note included a number of questions to the DCLG. To date only matters covered in SEEAWP 16/06 have been responded to. It was noted that a NCG meeting might be arranged by the end of March 2017

7. Soft Sand Supply in South East England

The mpas are preparing a Soft Sand Statement of Common Ground. It will be a factual statement and is intended to help with the Duty to Co-operate. The SEWPAG Memorandum of Understanding structure is being used. The aim is to have the statement ready to sign off in February. The document will not be policy shaping.

LD raised that Milton Keynes and Buckinghamshire do not wish to sign it, in its current form, however this will be discussed between the mpas.

8. Marine Plans

Clare Kavanagh (CK) from the Marine Management Organisation (MMO) gave a short presentation on the progress of the South Marine Plan(s). She explained that the South Marine Plan(s) consultation is open from 7 November 2016 to 27 January 2017.

The consultation gives interested parties the chance to share their views and opinions on the draft South marine plan. There are four aggregate policies; three similar to those in the approved East Marine Plan(s) and one referring to the local use of marine aggregate. CK urged members to review all the policies in order to understand the context for those addressing aggregates.

Attention was drawn to the MIS (Marine Information System) as it provided an aid to decision making.

It was agreed that the Secretary would draft a response to the consultation on behalf of SEEAWP that would be approved by the Chairman.

9. MPA Economic Outlook

'In Focus: Update on the MPA long-term aggregates supply and demand scenarios (2016-30) (SEEAWP 16/06) was discussed. DP explained the paper is not a forecast, but more a set of scenarios based on different assumptions that could affect long term aggregate demand and supply. The industry view is that land-won sand and gravel supply will continue to decline. This will be replaced by crushed rock and marine aggregates. Secondary and recycled materials will continue as a major source of supply at about the understood current level of 30%.

It was agreed that the paper is helpful resource to the mpas and the MPA will continue to share future editions.

10. DCLG Update

In the absence of Eamon Mythen (DCLG) a written update from him (SEEAWP 16/07) had been circulated with the agenda. It was noted the White Paper is still awaited.

11. Any other Business

N/a

12. Date of next meeting

The next meeting will be held on Monday 3rd April in Winchester at 14.00.

Actions

		By
1	Minutes for meeting of 21 July to published on SEEAWP website – since actioned	Secretary
2	Revised LAAs	Relevant mpas
3	Revised tables for AM 2016 to be reported at next meeting of SEEAWP	Secretary
4	Response to the South Marine Plan(s) consultation	Secretary/Chairman

DtC15 - SEEAWP Letter (December 2016)

Technical Secretary: Richard Read BA. MRTPI

Address: c/o Strategic Planning, Hampshire County Council, First Floor, EII Court West, The Castle, Winchester, SO23 8UD

Tel: 07786977547 **Email:** readplanning@btinternet.com

SEEAWP Mineral Planning Authorities

19 December 2016

Dear Head of Planning Services

South East England Local Aggregate Assessments 2016

Thank you for submitting your authority's draft Local Aggregate Assessment (LAA) for consideration by SEEAWP.

SEEAWP met on the 21 November and considered SEEAWP 16/04. The LAAs were approved by SEEAWP and the draft Minute with 16/04 are attached to the email covering this letter.

Both the report 16/04 and the Minute contain remarks which I hope that your authority will take into account, as appropriate, when finalising the current LAA. There are also further comments that you might wish to take into account when preparing future LAAs.

I appreciate your cooperation in this matter and please contact me if you require further assistance.

Yours faithfully



Richard Read BA. MRTPI
Secretary to SEEAWP

Circulated to:

Milton Keynes Council
Buckinghamshire County Council
West Berkshire Council
Central and Eastern Berkshire Unitary Councils
Hampshire County Council
Isle of Wight Council
Surrey County Council
West Sussex County Council
East Sussex County Council
Kent County Council
Medway Council

DtC16 – Correspondence with Hampshire County Council (April 2017)

From: Spriggs, Melissa [<mailto:melissa.spriggs@hants.gov.uk>]
Sent: 25 April 2017 15:01
To: 'Rob Thain'
Cc: Rupy Sandhu; Ian Blake; Planning Policy
Subject: RE: HCC Representation on the Regulation 19 West Sussex Minerals Local Plan

Dear Rob,

Thank you for the meeting this morning.

I can confirm that I am happy with the changes outlined in your email below and therefore, withdraw Hampshire County Council's objection to the Regulation 19 West Sussex Minerals Local Plan.

Kind regards,

Melissa

Melissa Spriggs

Planning Policy Manager

Strategic Planning

Economy, Transport & Environment Department,
Hampshire County Council, 1st Floor, Ell Court West,
The Castle, Winchester, Hampshire SO23 8UD

Tel: 01962 846330 **Fax:** 01962 847055

Email: melissa.spriggs@hants.gov.uk

Web: www.hants.gov.uk/county-planning

Please note that I work part-time and am not in the office on Fridays.

To view the latest information on Planning for Hampshire's Minerals and Waste, please view the Planning Policy webpages:<http://www3.hants.gov.uk/planning/mineralsandwaste/planning-policy-home.htm>

From: Rob Thain [<mailto:Rob.Thain@southdowns.gov.uk>]
Sent: 25 April 2017 14:25
To: Spriggs, Melissa
Cc: 'Rupy Sandhu'; Ian Blake
Subject: HCC Representation on the Regulation 19 West Sussex Minerals Local Plan

Good afternoon Melissa

Thank you for meeting with Rupy and I earlier today to discuss Hampshire County Council's (HCC) objection to the Regulation 19 West Sussex Minerals Local Plan.

As discussed, you are content to withdraw the objection subject to suitable revision to paragraph 8.3.7. Rupy and I have reviewed the proposed text changes to 8.3.7 and are content to change it subject to some further revision. This is set out below:

Within designated landscapes the test in paragraph 116 of the NPPF will need to be addressed. This will include provision of information about the national need for the mineral, as well as the benefits of permitting or refusing the application on the local economy. The expectation is that the search for alternatives outside the nationally designated landscapes should not be limited to the Plan area (or Licence Area for hydrocarbons) but should extend elsewhere within

those areas identified nationally as having potential which are not themselves subject to national landscape designations.

I trust that you find the proposed text changes acceptable and as such the HCC objection to the Regulation 19 West Sussex Minerals Local Plan should be withdrawn.

Please could you confirm accordingly.

Kind regards

Robert

Robert Thain MA MRTPI
Planning Policy Lead
South Downs National Park Authority
South Downs Centre
North Street
Midhurst
West Sussex
GU29 9DH

Tel: 01730 819263
www.southdowns.gov.uk
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Want to know what's happening in the South Downs National Park?
Get our latest news and views delivered to your inbox.
Sign up to South Downs News, our monthly newsletter at www.southdowns.gov.uk/join-the-newsletter

**DtC17 – Correspondence with South East Mineral Planning Authorities re.
Statement of Common Ground (April 2017)**

From: Spriggs, Melissa [<mailto:melissa.spriggs@hants.gov.uk>]

Sent: 25 April 2017 15:13

To: 'Andrew Morrow'; 'Bryan Geake'; 'Catherine Smith'; 'Chris Mills'; 'Elise Kinderman'; 'Emily Brown'; 'Gill King'; 'John Cheston'; Joint Central and Eastern Berkshire MWP; 'Katelyn Symington'; Kirby-Hawkes, Lisa; Kirstie May; 'Laura Davidson'; 'Mark Chant'; 'Mark Worringham'; 'Matt Meldrum'; Michael Elkington; Murray (Planning), Chris; 'Natalie Chillcott'; 'Pat Randall'; 'Paul Sanderson'; 'Paul Stimpson'; 'Peter Day'; 'Rebecca Williams'; 'Rob Thain'; 'Ross Crayford'; Rupy Sandhu; 'Sarah Ball'; Spriggs, Melissa

Cc: Ian Blake; Aggregate Working Party Contract

Subject: SE MPA Statement of Common Ground on Soft Sand - Final Version

Dear all,

Please find attached the Final Version of the SE MPAs Statement of Common Ground on Soft Sand which is now ready for each mineral planning authority to sign-off.

You will note that the figures are not yet contained. These should be ready for circulation shortly but it was felt they shouldn't delay the SOG.

I would be very grateful if you can notify me of when the SOG is signed-off (and by whom) in order that I can keep track of progress. Ian suggests we can take stock at the next Pre-SEEAWP meeting on how this is proceeding.

If you have any further comments on the SOG please contact Ian Blake directly. Otherwise, I look forward to hearing from you.

Kind regards,

Melissa

Melissa Spriggs
Planning Policy Manager
01962 846330
melissa.spriggs@hants.gov.uk

Please note that I work part-time and am not in the office on Fridays.

Economy, Transport & Environment Department
E11 Court West, The Castle, Winchester
Hampshire, SO23 8UD



DtC18a – Response from Durham County Council (September, 2015)

From: Jason Mckewon [<mailto:jason.mckewon@durham.gov.uk>]
Sent: 22 September 2015 14:33
To: Claire Potts
Cc: Graeme Smith
Subject: West Sussex Minerals Local Plan - Future Supply of Silica Sand

Dear Claire

Thank you for your email of 11 September 2015, I hope that the following answers will be of assistance.

Q1. Current Position on Silica Sand

The last operational silica sand quarry in County Durham was Weatherhill Quarry which was located to the north of Stanhope in Weardale. This quarry closed during 2011 and extraction has now permanently ceased.

For many years this sand was mainly used to optimise the chemistry of the feed for the manufacture of cement at the nearby Eastgate Cement Works which itself closed in 2002. Information previously provided to the County Council in response to the Council's survey of mineral operators indicated that sales from Weatherhill Quarry were very low (approximately 500 tonnes per annum) in recent years and that reserves were very extensive. Unfortunately, no permitted reserve figure is available from the previous operator. It is understood that up until its closure in 2011 the site served local markets mainly in the North East of England.

In addition to Weatherhill Quarry there are also two dormant silica sand planning permissions under the Environment Act 1995. Viewly Hill (High Stoop Quarry) near Wolsingham which was last worked in 1956 and Houselop Beck Quarry near Wolsingham which was last worked in the 1960s. These are both very old permissions dating from 1953 and 1949. No interest has been shown in reactivating either permission. No information is known in relation to the remaining extent of permitted reserves if any in either of these sites.

Q2 & 3 Existing Development Plan Position

Durham County Council's existing Mineral policies are set out within the County Durham Minerals Local Plan (December 2000). The approach of the Minerals Local Plan to minerals was based upon an understanding of future need at the time the plan was prepared (in the late 1990s). On the basis of the very low sales of silica sand from Weatherhill Quarry and the extent of permitted reserves of silica sand at Weatherhill Quarry which were considered "adequate for the Plan period and well beyond", no specific provision was made for silica sand.

The County Durham Minerals Local Plan does not refer to the requirement to maintain a landbank of 10 or 15 years for silica sand. It is understood that this was due to the limited information available on permitted reserves and sales but also that these figures related to only one individual site.

The County Durham Minerals Local Plan does not allocate sites for silica sand, instead it contains a number of criteria based policies which would be used to assess and determine any application for new silica sand extraction. However, experience

has shown that a proposal for new silica sand working coming forward is unlikely. No pre-application discussions or planning applications for new silica sand working have come forward for many years. Similarly, despite two calls for sites for new allocations as part of work to prepare the County Durham Minerals and Waste Development Framework (work started on these DPDs in 2004 and was abandoned in 2008 due to local government reorganisation) and later the County Durham Local Plan (2008 to date) no new site proposals for silica sand have come forward from the mineral industry.

Through future work the Council will prepare a Minerals and Waste Policies and Allocations DPD. This DPD will support the emerging strategic minerals policies in the emerging County Durham Local Plan. If needed the Minerals and Waste Policies and Allocations DPD will contain a specific policy on silica sand.

Q4. Maintaining a landbank and production

Durham County Council has not sought in the past to maintain a landbank of silica sand. In this regard information on silica sand sales and permitted reserves has been difficult to obtain.

As stated above the operator of Weatherhill Quarry ceased production of silica sand in 2011 and the quarry closed. Given these circumstances we cannot maintain production.

Durham County Council is not aware of any unmet need for silica sand within County Durham and we are not relying on other authorities to supply need from County Durham.

Through the emerging provisions of the County Durham Local Plan, which was submitted for examination in April 2014, the Council is seeking to safeguard the entirety of the silica sand resource in County Durham. In addition through the preparation of a subsequent development plan document, the Minerals and Waste Policies and Allocations document, we will consider the need for a specific silica sand policy and undertake a further call for sites.

Q.5 Duty to Cooperate discussions

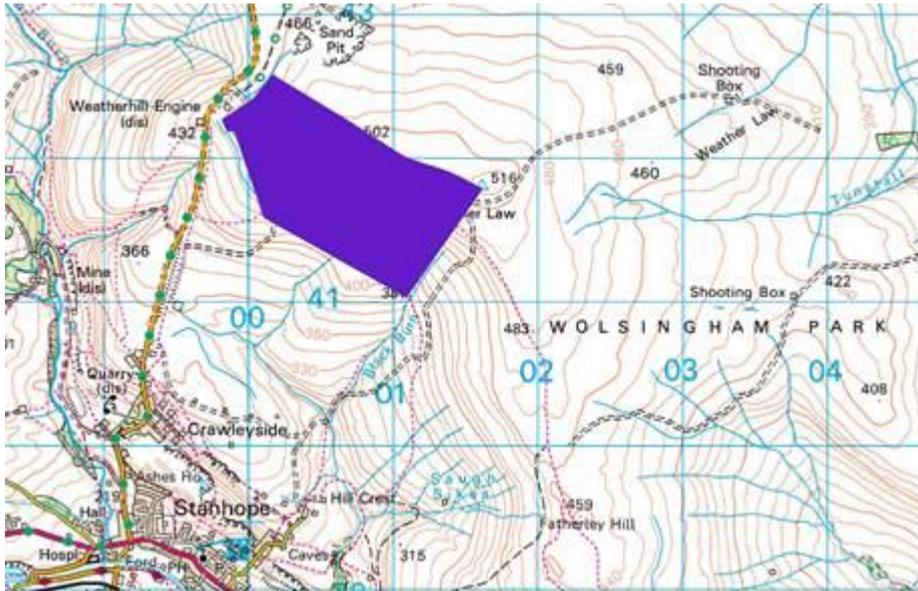
Durham County Council has had regular discussions with other Mineral Planning Authorities in the North East of England and both Cumbria and North Yorkshire County Council during which no discussion on silica sand has occurred.

Q.6 Location of Silica Sand Resource and Sites

The silica sand resource in County Durham lies entirely within the North Pennines Area of Outstanding Natural Beauty (AONB) to the north of Stanhope in Weardale. This link shows the location of the silica sand resource:

<http://spatial.durham.gov.uk/localplan/default.aspx?layerid=25&x=411898&y=537216&scale=400000>

Weatherhill Quarry is shown here:



Silica Sand Options

Seeking to identifying specific sites and/or extensions if at all possible and including a criteria based policy would seem the best course of action and would provide a plan led approach.

Please contact me if you have any further questions.

Yours sincerely

Jason Mckewon B.A. (Hons) MTP MRTPI
Senior Policy Officer
Spatial Policy Team
Regeneration and Economic Development
Durham County Council
Telephone 03000 263 403
Email: Jason.mckewon@durham.gov.uk

DtC18b – Response Norfolk County Council (October, 2015)



via e-mail

Ms Claire Potts
Minerals and Waste Manager
South Downs National Park Authority
North Street, Midhurst
GU29 9DH

NCC contact number: 0344 800 8020
Textphone: 0344 800 8011

Your Ref:

Date: 2 October 2015

My Ref:

Tel No.:

01603 222349

Email:

richard.drake@norfolk.gov.uk

Dear Ms Potts

Re: West Sussex Joint Minerals Local Plan: Silica Sand Supply Options

This is an officer level response and is made without prejudice.

Introduction

Norfolk County Council in its capacity as the Mineral Planning Authority for Norfolk has planned for the production of Silica Sand in its adopted Minerals and Waste Core Strategy (September 2011). Core Strategy Policy CS1 contains a requirement to meet an annual production target of 750,000 tonnes per annum.

Please find below a link to the adopted Minerals and Waste Core Strategy:

<http://www.norfolk.gov.uk/view/ncc094912>

The Minerals Site Allocations Plan was adopted in October 2013 and contains a site specific allocation (reference MIN40) for the extraction of three million tonnes of silica sand.

Please find below a link to the adopted Minerals Site Specific Allocations Plan:

<http://www.norfolk.gov.uk/view/ncc126927>

A requirement for a Single Issue Review of Silica Sand was a Main Modification to the Mineral Site Specific Allocations Plan as a result of insufficient acceptable sites being submitted. This resulted in a shortfall in planned silica sand allocations.

Sites were considered unacceptable as a result of uncertain impacts on a European designated site.

The Single Issue review is currently being prepared. Please find below a link to the consultations page for the Single Issue Review:

http://www.norfolk.gov.uk/Environment/Planning/Minerals_and_Waste_planning_policy/Current_Planning_Policy_Consultations/index.htm

Continued.../

Questions

1. Your Current position in relation to silica sand?
 - a) Norfolk currently has one permitted silica sand working at Leziate which is connected to a processing plant and railhead and operated by Sibelco UK Ltd.
 - b) Norfolk had 3.5million tonnes of permitted reserves as at 31/12/14, and an adopted allocation for 3 million tonnes.
 - c) The majority of silica sand from Norfolk is used for glass making and supplies glassworks in the Northeast and Northwest of England by rail. All other silica sand is used for other specialist purposes and none is used as construction aggregate.
 - d) The landbank at 31/12/14 was 4.67years based on a planned requirement of 750,000 tonnes per annum.
2. Norfolk is currently undertaking a Single Issue Review of Silica Sand to address the shortfall in planned silica sand allocations. It should be noted that landbanks are calculated on permitted reserves not allocations in accordance with national guidance.
3. The Single Issue Review will allocate Specific sites, or if insufficient sites are submitted it will seek to define Areas of Search in accordance with national guidance, together with an Area of Search Policy which will contain requirements for future applications within these areas.
4. There are significant resources of silica sand within Norfolk and it should be possible for suitable sites to come forward, although some parts of the resource are heavily constrained. Whether a sufficient landbank can be maintained depends in large part on the operator's willingness to submit planning applications.
5. Norfolk County Council as Mineral Planning Authority have had Duty to Cooperate correspondence with a number of other MPAs and also LPAs who have glassworks within their areas. The outcome was that the qualities of the silica sand in Norfolk are scarce and not found widely in other silica sand resources, that the resource is required to supply the processing plant, and that there are currently sufficient resources to continue to supply silica sand in Norfolk.
6. No, none of our existing, allocated or proposed silica sand sites are within a national park or AONB. One of our aggregate allocations is within an AONB, and this was found sound at examination. There is a requirement to complete an enhanced restoration scheme on the allocation and an adjacent IDO permission which would otherwise not benefit from a modern restoration scheme, with public access and geodiversity interpretation.

The options to be taken forward by the Authorities will need to be based on an assessment of all factors within the Plan area and are a matter for the Authorities. However, we would like to make the following comments. National Policy indicates that wherever possible Mineral Plans should seek to meet the identified need through the allocation of Specific Sites, followed by Preferred Areas and Areas of Search. Therefore, the Authorities should consider the potential for Site Specific allocations to meet the identified need before considering other options, as National Park Authorities are not required to consider Preferred Areas and Areas of Search.

Norfolk County Council has an adopted policy encouraging the extensions to existing mineral workings as necessary infrastructure is already in place in these locations, and this may be an approach the Authorities wish to consider. However, it is recognised that large parts of the Authorities administrative area is covered by designated area and therefore national guidance states that it may in exceptional circumstance be appropriate to rely on criteria-based policies.

If you have any queries, please contact me.

Yours Sincerely

Richard Drake
Senior Planner (Minerals and Waste Policy)

DtC18c – Response from Central Bedfordshire County Council (September, 2015)

Claire Potts

South Downs Centre,
North Street,
Midhurst,
GU29 9DH

Date: 23/09/2015

Dear Claire,

West Sussex Joint Minerals Local Plan: Silica Sand Supply Options

Thank you for your letter dated 11th September 2015. I shall respond to each question you ask in your letter in turn.

1. Our most up-to-date information on permitted silica sand sites, reserves, landbanks and markets is contained in a short Technical Evidence paper which was produced to support the Bedford Borough, Central Bedfordshire and Luton Borough Councils: Minerals and Waste Local Plan Strategic Sites and Policies (MWLP:SSP). I have attached a copy of this document for your information.
2. The Shared Service does have an up to date plan the - MWLP:SSP which was adopted in January 2014. The Plan includes a policy (MSP5) which describes the circumstances in which new silica sand sites may be permitted. The policy states:

“Silica sand sites will be released where there is a demonstrable need for the product to supply individual processing plants in the Plan area and this need cannot be met from existing extraction sites in the Plan area or from alternative materials, in order to maintain continuity of production for at least 10 years.”

The supporting text to this policy acknowledges that the need for further reserves must be balanced against environmental constraints. The Plan also recognises that silica sand processing plants can require significant capital investment and as such it may be necessary to provide a stock of permitted reserves to provide for at least 15 years of operation.

3. The MWLP:SSP includes one Strategic silica sand site- Clipstone Brooke and a criteria based policy which allows sites to come forward, when needed.
4. Whilst the Shared Service does not anticipate any problems in maintaining a sufficient landbank of silica sand, it is aware that annual production of silica sand within Central Bedfordshire has dropped significantly due to Sibelco mothballing its sites in 2014.
5. The Shared Service had a brief duty to cooperate discussion with Norfolk County Council on the matter of silica sand provision, but the issue was not pursued and as such there was no outcome.
6. None of our existing or allocated silica sand sites are located within the AONB. The silica sand deposits are mainly found in the southwest corner of Central Bedfordshire, near Leighton Buzzard, outside the AONB.

There is only one active mineral site within the AONB – Kensworth quarry which was permitted in 1953 on appeal and extended in the early 1990s, before the adoption of the NPPF.

The Shared Service suggests that a combination of options 1-3 (i.e Option SS4+) offers the most flexibility and would be the option most likely to be able to deliver the steady and adequate supply of minerals the country needs.

If you have any further questions please do not hesitate to contact the Minerals and Waste Planning Team.

Yours sincerely

Natalie Chillcott

Minerals and Waste Planning Officer

Direct telephone 0300 300 4891

Email Natalie.chillcott@centralbedfordshire.gov.uk

**Minerals and Waste Planning Shared Service for
Central Bedfordshire and Bedford Borough
Councils**, Priory House, Monks Walk,
Chicksands, Shefford, Bedfordshire SG17 5TQ

Telephone 0300 300 4891

Email natalie.chillcott@centralbedfordshire.gov.uk
www.centralbedfordshire.gov.uk

DtC18d – Response from Lancashire County Council (September, 2015)

Claire Potts

From: Sharples, Richard <Richard.Sharples@lancashire.gov.uk>
Sent: 14 September 2015 12:56
To: Claire Potts
Subject: FW: West Sussex Minerals Local Plan - supply of silica sand
Attachments: DtC_silica_MPA_end_users_lancs.pdf

Claire,

We don't have any permitted reserves for silica sand, and have not received any interest from silica sand operators during our local plan work.

We have not received any communications from any silica sand end users that may be based in our plan area, and have not had any duty to cooperate meetings with other MPAs regarding silica sand.

We don't have any comments to make on silica sand supply options set out in your letter.

Regards,
Richard

Richard Sharples
Planning Officer
Planning and Environment
Lancashire County Council
01772 534294
Richard.sharples@lancashire.gov.uk
www.lancashire.gov.uk

From: Claire Potts [<mailto:Claire.Potts@southdowns.gov.uk>]
Sent: 11 September 2015 13:49
To: Perigo, Stuart
Cc: Kirby, Mike; Rupy Sandhu
Subject: West Sussex Minerals Local Plan - supply of silica sand

Dear Stuart,

As you may be aware West Sussex County Council (WSSCC) and the South Downs National Park Authority (SDNPA) (the Authorities) are currently preparing a Joint Minerals Local Plan. Once adopted this Plan will set out planning policy for the supply of minerals in West Sussex to 2033.

The Authorities are currently in the process of identifying and evaluating options with a view to ensuring that those chosen are deliverable and consistent with national policy. Amongst other things, options for the supply of silica sand, which is present in West Sussex, are being considered and the NPPF expects that MPAs co-operate with neighbouring and more distant authorities to co-ordinate the planning of industrial minerals such as silica sand. As we have identified that you have silica sand end users (e.g. glass manufacturers) within your MPA area we would therefore be grateful for a response to the matters referred to in the attached letter by Friday 25 September 2015.

Please contact me if you have any queries.

Yours sincerely,

Claire

Claire Potts
Minerals and Waste Manager
South Downs National Park Authority

Tel: 01730 819287 | Mobile: 07557 853260
South Downs Centre, North Street, Midhurst, West Sussex, GU29 9DH
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DtC18e – Response from Hertfordshire County Council (September, 2015)

**Chief Executive and Director of
Environment: John Wood**



Claire Potts
Minerals and Waste Manager
Southdowns National Park Authority

**Spatial Planning & Economy Unit
Minerals and Waste Team**
CHN216
County Hall
Hertford, Herts SG13 8DN

Claire.potts@southdowns.gov.uk

spatialplanning@hertfordshire.gov.uk

Telephone : 01992 556254
Minicom : 01992 556611
Contact : Trish Carter-Lyons
My ref : SPEU/TCL
Your ref :

Date : 25 September 2015

Dear Claire

West Sussex Joint Minerals Local Plan: Silica Sand Supply Options

I am writing in response to your letter of 11 September regarding the preparation of the West Sussex County Council and South Downs National Park Authority Joint Minerals Local Plan and the potential silica sand supply options.

With regard to the national need for the industrial mineral in your area, you have identified through your silica sand study that Nazeing Glassworks in Hertfordshire is supplied with this high grade silica sand resource.

I outline below our position in relation to planning for supplies of silica sand to the user in our area by answering the questions set out in your letter.

1. a) Hertfordshire does not have any permitted reserves of silica sand;
b) Hertfordshire does not have any remaining reserves of silica sand;
c) As you identified, Hertfordshire has glass manufacturing supplied with silica sand;
d) Hertfordshire does not have a landbank for silica sand.
2. The minerals and waste planning policy team has not been approached by silica sand end users regarding concerns about the security of its supply. The team has not approached any end users about the security of the supply of silica sand.
3. The minerals and waste planning policy team has not had any duty to cooperate discussions with any other MPAs to discuss silica sand provision for industrial end users in our area.

With regard to the options for the supply of silica sand as outlined in your letter, I consider that option 4 (SS4+) would be most suitable, that being a combination of identifying specific sites, extensions to existing sites and a criteria-based policy to assess unallocated silica sand sites within your Minerals Local Plan. The preference of one option over another may be considered to limit the scope for maintaining a supply of silica sand.

Should you need to discuss the supply of this industrial mineral to our authority area any further please do not hesitate to contact me.

Yours sincerely

P A Carter-Lyons

Trish Carter-Lyons

Planning Officer – Minerals and Waste Policy

DtC18f – Response from Nottinghamshire County Council (September, 2015)

Claire Potts

From: Steven Osborne-James <steven.osborne-james@nottscc.gov.uk>
Sent: 15 September 2015 12:00
To: Claire Potts
Subject: DtC Silica sand

Hi Claire,

Please find below Nottinghamshire's response to your duty to co-operate questions regarding silica sand provision.

Q1. Current position

Nottinghamshire's reserves of silica sand are contained in two permitted quarries - Ratcher Hill near Mansfield and a recently opened quarry at Two Oaks Farm just south of Mansfield. Both are owned by the same operator; Mansfield Sand Limited. The Two Oaks Farm quarry will fully replace Ratcher Hill quarry once it is worked out by the end of the year/early next year (no extensions are possible) so maintaining existing production levels. Production over the last 10 years has averaged 230,000 tonnes.

Given the recent planning permission at Two Oaks Farm, the landbank now stands at around 40 years, well above the minimum 10/15 years required.

The Mansfield Sand website identifies the following uses for the silica sand: *We provide a wide range of innovative products for sports, landscaping and equestrian uses. These include stadia and training ground facilities, championship golf and world class show jumping arenas. Our extensive client portfolio includes some of the most prestigious sporting venues across the UK and Europe.* (Mansfield-sand.co.uk)

Q2 & Q3. Plan preparation & policy

The existing plan was adopted in Dec 2005. Policy M7.6 'Silica Sand Landbank' states:

Planning permission will be granted for silica sand extraction that seeks to maintain an appropriate landbank of permitted reserves provided they do not have an unacceptable environmental or amenity impact.

We are currently working on the preparation of the new minerals plan and expect to publish the submission draft consultation document by the end of the year. Proposed policy MP8 Silica Sand Provision states:

- 1. The extraction of remaining reserves at the following permitted sites will be utilised to contribute towards the provision of an adequate and steady supply of silica sand sufficient for at least ten years:*

SLb Two Oaks Farm

Note: The above sites are shown on the Policies Map

2. *Proposals for silica sand extraction outside the sites identified above will be supported where a need can be demonstrated.*

Q4. No problems expected given the Two Oaks Farm permission.

Q5. No

Q6. No

Options currently being considered:

The overall approach to minerals provision in the emerging Nottinghamshire minerals plan is to identify extensions to existing sites / new sites and or criteria based policies and therefore from our point of view Option SS4+ is considered most suitable.

Any further questions let me know

Regards

Steve

Steven Osborne-James
Planning Policy Team

Information of the development of the new Minerals Local Plan can be found at: Nottinghamshire.gov.uk/minerals

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DtC18g – Response from North Yorkshire County Council (September, 2015)

Claire Potts,

Many thanks for your email and letter.

Please see below responses to the specific questions within your letter:

1. The North Yorkshire County Council plan area has 2 sites working silica sand:
 - Burythorpe Quarry, near Malton. An active site which produces resin coated foundry sand and sand for agricultural and equestrian uses. The majority of the silica sand is exported outside the County. At the end of 2013 there were sufficient reserves in the permitted site area to give an estimated landbank of 16 years at end 2013.
 - Blubberhouses Quarry, in Nidderdale AONB and adjacent to a SPA/SAC, has been mothballed since 1991. The silica sand at the site has properties suitable for glass manufacture and there is an estimated reserve of 4 million tonnes permitted at the site. The end date for the permission has passed recently, although an application, as yet undetermined, for an extension of the life of the site, has been received.
2. North Yorkshire County Council, City of York Council and North York Moors National Park Authority are currently preparing a Minerals and Waste Joint Plan. The Preferred Options stage of the Plan is due to be published in Autumn. The emerging Plan is expected to contain a preferred policy approach supporting the continuing extraction of Silica Sand at Burythorpe Quarry in order to maintain reserves throughout the period to 2030, ensuring a minimum 10 year landbank. It is also expected the Preferred Options Plan will contain a criteria based policy relating to the Blubberhouses site.
3. The overall geographical extent of potential resources of silica sand within the Plan area is very small, with occurrences in two separate locations: at Burythorpe, near Malton to the east and Blubberhouses, in Harrogate Borough to the west. The emerging Plan specifically refers to these sites within the Preferred Policy 'Continuity of Supply of Silica Sand' and circumstances under which new permissions at these sites would be supported. No proposals for extensions to Burythorpe Quarry have been received for consideration through the MWJP. A site submission has been received in respect of Blubberhouses Quarry for an extension of time to enable the continuation of extraction of Silica Sand from the existing site (which has been mothballed since the 1990's).
4. There is one major manufacturer of float glass in the County, near Eggborough in the Selby District. It is understood that the company import silica sand from Norfolk, and have not voiced any concern over future supply so far as we are aware. There is no indication if and when an additional supply of silica sand would be needed for glass manufacture, plus there is potential supply available within North Yorkshire if the mothballed site at Blubberhouses received a current permission to work.
5. See above
6. Discussions have been undertaken with Norfolk County Council under Duty to Cooperate requirements due to the understanding that a major user of silica sand in the Plan area is known to be reliant on silica sand currently imported from Norfolk. As a result of discussions it is understood that Norfolk County Council considers that suitable areas of silica sand exist in Norfolk which could be brought forward to allow the continuation of operations at the Liziata processing works until at least 2026 (the sole silica sand site in operation in Norfolk).

It is also considered that there are silica sand resources in Norfolk which have the potential to allow extraction until at least 2030.

With regard to the Silica Sand Supply Options presented in your letter it would appear that Option SS4+ (a combination of options 1-3) would be the most appropriate as it offers a certain degree of flexibility. However, without reviewing the entirety of the Options in the emerging Joint Minerals Local Plan it is not possible to provide a comprehensive response.

If you have any further queries please do not hesitate to get in touch.

Best Regards

Minerals and Waste Policy Team
North Yorkshire County Council

DtC18h – Response from Surrey County Council (September, 2015)

----- Forwarded by David Maxwell/EAI/SCC on 01/10/2015 10:18 -----

David Maxwell/EAI/SCC

21/09/2015 14:13

To Claire Potts <Claire.Potts@southdowns.gov.uk>,
cc Paul Sanderson/EAI/SCC@SCC, Maureen Prescott/EAI/SCC@SCC
Subject Re: FW: West Sussex Minerals Local plan - future supply of silica
sand [Link](#)

Claire

Thank you for your email regarding future supply issues in relation to silica sand. My thoughts are as follows:

Question 1:

We used to have two silica sand sites in Surrey comprising Tapwood Pit / Park Pit, Buckland (operated by Hansons) and North Park Quarry (NPQ), Godstone (operated by Sibelco UK). Tapwood has now been worked out and is in the process of being restored.

In March 2012, we granted planning permission to Sibelco UK for the extraction of 2.5 mt of primarily silica sand from Land North East of Pendell Farm, Bletchingley, the vast majority of which is to be used for non-aggregate uses. The site forms part of a broader area allocated for silica sand extraction in the Surrey Minerals Plan Core Strategy (SMP CS) 2011. A copy of the committee report is attached below (Item 9 - Pendell). This has been presented as an extension to NPQ with the mineral being transported to NPQ by conveyor for processing. As of 31 December 2014, mineral working had yet to commence. I can't give you an overall permitted reserve figure for silica sand at NPQ and Pendell Farm combined for reason of commercial confidentiality as we only have one operator and two sites in Surrey. However, coincidentally, an application to extend the period of working at NPQ is being considered by our Planning and Regulatory Committee on 23 September 2015. I've not read the committee report but I attach a copy below as it should provide you with some helpful information on NPQ.

In terms of markets, there is some information contained within the above committee rpt on Pendell. The two background reports attached below will also be of interest.

In terms of landbanks, I can't give you a precise figure for reasons of commercial confidentiality. However, the results of the AM2014 Survey indicates that the landbank for silica sand in Surrey based on sales recorded in 2014 is between 5 and 10 years.

Question 2:

Yes, SMP CS Policy MC8 makes suitable provision for silica sand.

Question 3:

The SMP Core Strategy includes one large specific silica sand site allocation (Pendell Farm, Bletchingley), and two areas of search (land adjoining Pendell Farm, Bletchingley and Chilmead Farm, Nutfield Marsh) for possible silica sand extraction in the longer term.

Question 4:

Not from our perspective. We have set the planning framework to enable sites to come forward. It is now down to industry.

Question 5:

In more recent times, we have been consulted by Kent CC on a planning application for silica sand extraction, but I can't recall the DtC being mentioned in correspondence. I think I sent you details of this application / permission in a recent email. We have also been consulted by Norfolk CC concerning a lack of provision for silica sand in their proposed Site Specific Allocations DPD in the period to 2026, which was not in accordance with their adopted Core Strategy. This was to be addressed through a future Core Strategy review in 2015. In June 2013, we responded to Norfolk CC

as follows:

"Surrey County Council (SCC) note the anticipated shortfall in silica sand provision against the adopted Minerals and Waste Core Strategy. SCC welcomes the proposed commitment at paragraph 2.7 to undertake a single issue review which will consider land for site specific allocations, preferred areas and/or areas of search that would be suitable to address this shortfall. SCC also notes that the review would be completed by 2016. SCC request that it be consulted regarding the review at the earliest opportunity."

Earlier this year we were consulted by Norfolk CC (Minerals Site Specific Allocations DPD - Single Issue Review of Silica Sand, Initial consultation). We replied on 19/3/2015 with no observations. I can't recall why with any certainty but have a feeling Norfolk were committed to addressing this shortfall.

Question 6:

Our existing sites at North Park Quarry and land North East of Pendell Farm are both partly within the AONB. The two committee reports attached above explain how this issue has been dealt with. In terms of the allocation of Pendell Farm, the key development requirements stated in the Surrey Minerals Plan require any application to demonstrate the public interest in working the land within the Surrey Hills AONB, assess visual impact and impacts on landscape character and features of the area giving particular attention to the potential effect on the natural beauty, local character and distinctiveness of the Surrey Hills AONB. Policy MC2 of the SMP Core Strategy DPD (attached below) deals with mineral extraction in the AONB.

Options

In terms of options, it is difficult to comment without knowing the context of the plan area in relation to silica sand working (currently and in the past). I would say that the need is more likely to be national rather than local (as silica sand can travel a significant distance) although I don't think this limits the case for bringing sites forward if considered necessary. In Surrey, the AONB has not prevented us from identifying suitable sites and bringing these forward for development provided certain conditions are met / demonstrated as set out in the two attached committee reports. In saying that, some of the deposits in Surrey are of a very high quality. In terms of the options, one and two have the obvious advantage of providing greater certainty for industry and the population in general and provide the planning authority with greater control over where development might take place in future. In this respect, there are clear advantages with options 1 or 2 or a combination of the two. The danger with option 3 is that it places a larger amount of the plan area (and presumably the National Park) at risk of development reducing the ability of the planning authority to control development in designated landscapes and more sensitive areas.

I trust you find this information helpful.

Regards
David

DtC18i – Response from Staffordshire County Council (October, 2015)

From: Griffin, Matthew (Place) [<mailto:mat.griffin@staffordshire.gov.uk>]

Sent: 01 October 2015 17:36

To: Claire Potts

Subject: RE: West Sussex Minerals Local Plan - future silica sand supply

Dear Claire

In response to your letter dated 11 September 2015, please see information below:

1. a) Permitted sites in Staffordshire: Moneystone Quarry near Oakamoor which was the only recent supply of industrial sand in Staffordshire, ceased production in 2011 and is being restored. Silica sand is now only produced at Hurst Quarry, Biddulph and the sand from this quarry is used as horticultural product rather than as industrial sand.
 - b) Remaining reserves: There is no publicly available figure for remaining reserves at Hurst Quarry but the current permission provides for mineral extraction up to 2036.
 - c) Markets: Moneystone Quarry was a significant source of sands used for clear glass manufacturing and it is understood that replacement supplies are extracted at Sibelco's sites in Norfolk. As indicated above, the sand from Hurst Quarry is used as horticultural product (bunker sand, etc).
 - d) Landbanks: The current Minerals Local Plan adopted in 1999 required a 10 year landbank to be maintained for Moneystone Quarry and included an area of search for maintaining production at the Moneystone plant. An application ([SM.06/10/122 M](#)) in relation to the area of search was refused in 2007.
2. Our emerging new Minerals Local Plan for Staffordshire does not provide for the maintenance of a landbank at Hurst Quarry.
3. The Plan does not allocate specific sites or have a criteria based policy to allow sites to come forward when needed.
4. N/a
5. The county council was consulted by Norfolk CC in respect of a Site Specific Allocations Development Plan Document. No objections were raised by Staffordshire CC in respect of this document and proposed focussed changes relating to the provision of silica sands.
6. Hurst Quarry is not within a national park or AONB.

Kind regards,

Matthew Griffin

Team Leader (Minerals Planning Policy)

Office location: No. 1 Staffordshire Place (Floor 2), Stafford ST16 2LP

Postal address: Planning, Policy & Development Control, c/o Staffordshire County Council, 2 Staffordshire Place, Tipping Street, Stafford. ST16 2DH

Tel. 01785 27-7275

Visit the Staffordshire Planning at www.staffordshire.gov.uk/planning

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DtC18j – Response from Cheshire East Council (March, 2016)

Natalie Chillcott

From: ACTON, David <David.Acton@cheshireeast.gov.uk>
Sent: 09 March 2016 16:24
To: Natalie Chillcott
Subject: silica sand

Dear Natalie,

Thank you for your e-mail and attached letter and apologies for the delay in responding.

We have gone through the questions and the answers are as follows:

Q1

- a) Permitted sites:
 - Arclid Quarry – permission until 2035.
 - Bent Farm – permission until 2021.
 - Dingle Bank Quarry – permission for extraction until 2016 but we currently have an EIA scoping opinion which advises they will shortly be seeking a time extension for extraction until 2019.
 - Eaton Hall Quarry – permission until 2026 but likely to seek a time extension as part of the new site extension proposals due to be submitted imminently.
- b) Permitted reserves: approximately 13.6mt of Silica sand.
- c) Markets: unable to specify as we do not have this information. Previously it has served major glass manufacturers at Pilkingtons but I believe that market is not as strong as it was and they now serve other markets including sports pitches, golf courses etc. The LAA says its used for industrial, horticulture and leisure uses.
- d) Current landbank – we do not have up to date figures at present as work is still on-going. The LAA for 2014 states that for silica, approximately 1.04 million tonnes of industrial sand from Cheshire as a whole (i.e. east and west) was sold in 2011. The Annual Mineral Raised Inquiry 2012 showed a drop in sales to 0.92 million tonnes. In addition to contributing to the overall aggregate landbank, a stock of permitted silica sand reserves are held at each individual site. Two of the four silica sand sites in Cheshire East currently hold a stock of at least 10 years reserves as indicated by national planning policy.

Q2) Our plan was adopted in 1999 and the policies have been 'saved'. It contains a policy (54) which seeks to maintain a landbank of at least 10 years at each production site throughout the plan period.

Q3) Policy 54 requires that any proven additional sites needed to maintain the landbank are provided from within land identified as preferred areas which are identified on maps in the Local Plan. These preferred areas are generally identified as extensions to existing silica sand sites.

Q4) Very broad estimates of our reserves and sales suggest that potentially we may not have sufficient reserves to maintain the sufficient landbanks at some of our sites. However we are aware of forthcoming planning applications which if approved would release additional reserves of silica. At present we do not

know whether these will be sufficient to address any potential shortfall in landbank figures as we do not have accurate estimates of reserves and we do not have accurate sales figures.

Q5) I am not aware of any concerns, not having been in contact with any silica sand end users. However, this might come out as an issue as the new Cheshire East Minerals DPD progresses through its Issues and Options stage.

Q6) Again, I am not aware of any concerns. However this might come out as an issue as the new Cheshire East Minerals DPD progresses through its Issues and options stage.

Hope the above is of some assistance.

Best Wishes,

Dave.

David Acton

Senior Planning Policy Officer
Spatial Planning
Cheshire East Council
Westfields
Middlewich Road
Sandbach
CW11 1HZ

Tel: 01270 686959

E-Mail: david.acton@cheshireeast.gov.uk

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DtC18k – Response from North Lincolnshire Council (March, 2016)

Natalie Chillcott

From: Spatial Planning <Spatial.Planning@northlincs.gov.uk>
Sent: 10 March 2016 15:12
To: Natalie Chillcott
Cc: Chris Barwell
Subject: Re: Silica Sand

Dear Natalie,

I have been forwarded your e-mail and letter (dated 8th March 2016) regarding silica sand supply from colleagues at Lincolnshire County Council. Please find my responses to the questions in letter below:

1. Your current position in relation to silica sand?

North Lincolnshire has three sites of varying sizes where silica sand is being or has been extracted. These sites are at Messingham (to the south of Scunthorpe), Cove Farm Quarry at Westwoodside (in the south west of North Lincolnshire) and Eastfield Farm at Winteringham (near the Humber Estuary). Information on reserves and landbanks is limited, particularly due to commercial confidentiality issues on the part of site operators.

It is my understanding that the majority of the silica sand extracted is used for industrial purposes. Again, information on exact end uses is limited.

2. Does your authority have a (up to date?) Plan in place that provides for the maintenance of landbanks of 10 or 15 years for individual silica sand sites?

The current development plan for North Lincolnshire is made up of the LDF Core Strategy DPD (June 2011), the Housing & Employment Land Allocations DPD (March 2016) and the North Lincolnshire Local Plan (Saved Policies) (May 2003).

The Core Strategy DPD provides a broad, strategic policy in relation to minerals provision, whilst the Local Plan (Saved Policies) set out a number of detailed policies for mineral related development (including policies relating to silica sand extraction and identification of future possible extraction sites).

Looking to the future, it is anticipated that work detailed minerals planning policy and associated evidence base will commence later this year, at which point further consideration will be given to the issue of landbanks for all minerals.

3. Does it allocate specific sites or have a criteria based policy to allow sites to come forward when needed?

As mentioned above the saved policies of the North Lincolnshire Local Plan identifies sites for potential silica sand extraction. Looking to the future, it is anticipated that work detailed minerals planning policy and associated evidence base will commence later this year, at which point further consideration will be given to the issue of landbanks for all minerals.

4. Do you anticipate any problems in maintaining a sufficient landbank?

As mentioned in response to question 1 (above), information to assess the sufficiency of the landbank is limited to due issues of commercial confidentiality. In terms of the future, it is anticipated that work detailed minerals planning policy and associated evidence base will commence later this year, at which point further consideration will be given to the issue of landbanks for all minerals. This will look at identify any shortfalls in requirements and whether supplies are required from other authority areas.

5. Have you had duty to cooperate discussions with any other MPAs to discuss silica sand provision? If yes, what was the outcome of these discussions?

Ongoing duty to co-operate discussions take place between North Lincolnshire and its neighbouring mineral planning authorities, principally via the RAWP regularly. Limited discussions have taken place with Norfolk County Council in respect of silica sand as part of the preparation of their Minerals Local Plan.

6. Are any of your existing, allocated or proposed sites within a national park or AONB? If yes, have you applied the exceptional circumstances / public interest test in para 116 of the NPPF (to either policy making or a planning application decision). If you have, what was the outcome?

Not applicable.

I hope that my response assists you. If you have any further queries, please do not hesitate to contact me.

Kind regards

Iain Cunningham
Spatial Planning Team
Planning & Regeneration
Places Directorate
North Lincolnshire Council
Civic Centre
Ashby Road
Scunthorpe
DN16 1AB

Tel: 01724 297577

E-mail: spatial.planning@northlincs.gov.uk

From: Adrian Winkley <Adrian.Winkley@lincolnshire.gov.uk>

Sent: 08 March 2016 14:22

To: Spatial Planning

Subject: FW: Silica Sand

I have been requested to forward to you the attached letter from the South Downs National Park Authority. Please respond to them directly.

Regards

Adrian Winkley
Minerals and Waste Policy Team Leader
Planning Services
Unit 4
Witham Park House
Waterside South
LINCOLN
LN5 7JN

From: Natalie Chillcott [mailto:Natalie.Chillcott@southdowns.gov.uk]

Sent: 08 March 2016 12:42

To: Adrian Winkley
Subject: Silica Sand

Hi Adrian,

Thank you very much for speaking with me this morning. To summarise our conversation:

- There are no permitted silica sand sites within Lincolnshire (the area covered by Lincolnshire County Council) and as such Lincolnshire CC does not have a landbank of silica sand.
- The emerging Mineral Core Strategy and DM policy Plan, which is expected to be adopted in May 2016 includes a criteria based policy which allows silica sand sites to come forward.
- The emerging Site Locations Plan is unlikely to allocate silica sand sites.
- There are deposits of silica sand in Lincolnshire and as such the Core Strategy and DM Policy Plan includes a Mineral Safeguarding Area for Silica Sand.
- The quality of the silica sand in Lincolnshire is unknown.

Could you please let me know if any of the statements above are inaccurate and/or if you would like to make any further comments. You are also very welcome to respond to any of the questions raised in the attached letter which you feel are relevant.

If you could forward the attached letter to the appropriate person in North Lincolnshire I would be very grateful.

Many thanks and kind regards,

Natalie

Natalie Chillcott
Senior Planner (Minerals and Waste)
South Downs National Park Authority

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DtC19 – National Silica Sand Meeting Invitation (April, 2017)

From: Rob Thain Rob.Thain@southdowns.gov.uk
Subject: Duty to Cooperate - NPPF Paragraph 146: Planning for Supply of Silica Sand

Date: 3 April 2017 at 12:56

To: David.Acton@cheshireeast.gov.uk, mwdf@northyorks.gov.uk, richard.drake@norfolk.gov.uk, paul.sanderson@surreycc.gov.uk, t.g.badley@dorsetcc.gov.uk, mwdf@dorsetcc.gov.uk, mwdf@hants.gov.uk, melissa.spriggs@hants.gov.uk, spatial.planning@northlincs.gov.uk, steven.osborne-james@nottsc.gov.uk, devplans@highland.gov.uk, fife.devplan@fife.gov.uk, bryan.geake@kent.gov.uk, **Mike Abbott** Mike.Abbott@centralbedfordshire.gov.uk

Cc: Ian Blake ian@bppconsulting.co.uk, Rupy Sandhu Rupy.Sandhu@westsussex.gov.uk

RT

Dear Colleagues

I am writing to you as a Mineral Planning Authority that we understand has silica sand resources in its area and is planning or has planned for its supply in its Minerals Local Plan.

Preparation of the West Sussex Joint Minerals Local Plan (JMLP) by West Sussex County Council and the South Downs National Park Authority (the Authorities) has revealed that, while there are currently no specific silica sand mineral workings in West Sussex, a mineral resource that is of silica sand quality exists within the county. Indeed, it is understood that in at least one location the silica sand is of glass making quality. The resource is known to exist within a geological formation known as the 'Folkestone Formation' which is located across the five counties of Kent, Surrey, Hampshire, West Sussex and East Sussex.

The Authorities are addressing this matter in their Proposed Submission JMLP that has recently been published in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. In doing so the Authorities are mindful of the need to be consistent with paragraph 146 of the National Planning Policy Framework that states:

"Minerals planning authorities should plan for a steady and adequate supply of industrial minerals by:

- co-operating with neighbouring and more distant authorities to co-ordinate the planning of industrial minerals to ensure adequate provision is made to support their likely use in industrial and manufacturing processes;"

This is indeed highly pertinent as silica sand is supplied on a regional and national basis (as well as locally). The Authorities have therefore exchanged correspondence with various silica sand producing MPAs and published a Silica Sand Study (2016) to support the position taken in the Proposed Submission JMLP. As part of their discussions, the Authorities recently met with Central Bedfordshire Council who agreed that it would be helpful if a national arrangement were put in place to facilitate planning for the supply of silica sand in a manner envisaged by the NPPF (and the Duty to Cooperate). To progress this it is our intention to facilitate an initial meeting of all silica sand producing MPAs at which this matter, and future arrangements, could be discussed.

I would therefore be grateful if you would confirm your willingness and ability to attend such a meeting which it is envisaged will take place on Friday 19 May 2017. The meeting will take place in either London or Chichester. We will confirm the final location and time in due course once we understand the likely number of attendees. We would be grateful if only one officer from each MPA attended.

Kind regards

Robert

Robert Thain MA MRTPI
Planning Policy Lead
South Downs National Park Authority
South Downs Centre
North Street
Midhurst
West Sussex
GU29 9DH

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DtC20a – Response from Kent County Council (December, 2015)

Rupy Sandhu
Strategic Planning
West Sussex County Council
County Hall
Chichester
West Sussex
PO19 1RH



Growth, Environment & Transport
Environment, Planning and
Enforcement
Invicta House
County Hall
MAIDSTONE
ME14 1XX

Phone: 03000 413376
Ask for: Bryan Geake
Email: bryan.geake@kent.gov.uk
2rd December 2015
Your Ref:
Our Ref:

Dear Rupy

West Sussex Joint Minerals Local Plan-Duty to Cooperate

Thank you for your letter of the 16th of September 2015 (appended to this reply), in which you requested a reply by 25th September 2015. I apologise for the delay in my reply, though I understand from our discussions that your authority would still value this late response. In response to your specific questions I can respond as follows:

Q1. The make-up of future aggregate supply in West Sussex to meet identified needs

Until the full AM2014 import export movements are known it may be considered premature to say that Kent will not take an increasing amount of minerals from West Sussex, as this data may show an increasing trend since the last relevant survey of AM2009. That said, it is considered unlikely that a marked change in trend of limited supply from Kent to West Sussex to that of a significant supplier (of sharp sand and gravel) will arise. It is considered that transportation costs and the existence of closer alternatives to Kent's landwon material would negate this change in the pattern of supply.

Katie Stewart
Director of Environment, Planning and Enforcement

Q2. West Sussex Mineral future Supply Options

Table 1: Important Minerals in West Sussex shows that where indigenous supply is limited such that a degree of importation is occurring. However, the matter is more acute in Kent, to meet requirements over the next few years it will be unable to supply its own needs of sharp sands and gravels. This is a matter that West Sussex will increasingly experience (though there is an expected surplus in 2032) and marine dredged materials will be increasingly important. Thus, there remains the question of how far the marine resource can be relied upon into the future in Kent, West Sussex and other mineral planning authorities experiencing relative depletion of their landwon reserves and replenishing resources. It is a question greater than a West Sussex and Kent supply relationship analysis. It is inevitable that the marine dredged resources will exhaust at some point, as they are finite in nature.

Crushed rock in Kent is in relative abundance, given its part of the crustal massive geology of Kent. Permitted reserves are extensive (48-49 million tonnes) thus it is not anticipated that any increased need in West Sussex will necessarily mean that Kent's requirements (in the order of 0.78 million tonnes per annum) will be significantly constrained. It is of note the Kentish Ragstone is unable to meet all specifications of crushed rock aggregate use.

Q3. West Sussex Mineral future Supply Options

Supply should usually be indigenous to be sustainable. The geology dictates if the available array of mineral resource is limited or abundant. If the predicted demands outstrip supply scenarios then importation and substitution is the only other option.

Q4. West Sussex Mineral future supply options-Plan Only for indigenous Needs

Kent has currently permitted reserves of 8.04 million tonnes (as of end of 2014) and a potential replenishment supply of 16.42 million tonnes overall (to 2030). Predicted requirements over the life of the Kent Minerals and Waste Local Plan (until 2030) are 17 times 0.601 tonnes averaged yearly production, thus totalling 10.20 million tonnes. Total surplus could (if all the replenishment reserves were to come forward) result in a surplus of 14.24 million tonnes. Thus there does appear to be a margin of flexibility available to Kent for its anticipated Plan period 2013-2030.

It is the case that a maintained landbank of at least 7 years of annual averaged (10 years) production (an NPPF compliant landbank) to be made available, year on year, amounts to 4.20 million tonnes. This will be achieved in Kent only if all the identified replenishment sites do indeed come forward. This is by no means a certainty. If West Sussex's requirements for soft sand do indeed increasingly have to be met via imports from Kent (thus not incurring new extraction or extensions to existing sites in the relevant National Park) Kent's position of anticipated surplus may well alter. It is reasonable to conclude that exhaustion may not occur in Kent if West Sussex's 3.724 million tonne supply shortfall has to be addressed by Kent's potential surplus

Katie Stewart

Director of Growth, Environment and Transport

of 14.24 million tonnes. Though this is indeed predicated by all the replenishment sites come forward over the life of the Kent Plan. This is not, as stated, a certainty.

Q5. West Sussex Mineral future Supply Options-Effect of decline of Exports of Soft Sand from West Sussex

Provided that the economics of demand were such that it would be commercially attractive to import significant volumes of soft sand from Kent, then the issue would be whether or not the unconstrained potential resources to supplement those currently permitted would be sufficient to meet Kent's projected needs (in terms of a simple landbank) **and** that of West Sussex. It appears that there would be sufficient material to achieve this, provided the identified sites (in the Kent Minerals Sites Plan Preferred Options Consultation, May 2012) were to come forward in a manner that gives assurance that sufficient supply will be available (see Section 10 Future Aggregate Supply Options in Kent to Maintain a Steady Supply of Aggregates to Meet Market Needs in Kent, of The Third Local Aggregate Assessment for Kent November 2015). This is not a certainty, and there is a degree of fragility in this potential supply chain model in that a significant amount of potentially replenishing material is tied up in one site (Shrine Farm, Postling, Site 97, 8.0 million tonnes).

Should the expected supply chain not come forward, then this would have a detrimental impact on ensuring supply is maintained in both in Kent and the modelled West Sussex areas simultaneously. It is also true that discussing these two area's soft sand requirements in isolation is essentially unrealistic; for example East Sussex has limited landwon reserves and potential available resources and thus this area's requirements may be, in part, from Kent.

Q6. West Sussex Mineral future supply options- Future security of Kent Export Supply

Kent has not experienced any significant changes to its import/export infrastructure that would limit future patterns or quantities of exported soft sands. It should be borne in mind that local needs may change over time in an unpredictable manner and this may have an impact on materials available for export. Given the assumption that local needs would be met first as, in practice, there is greater competitive commercial advantage to serve local markets primarily.

Q7. West Sussex Mineral future supply options- Market areas for Kent Soft Sand Sites

At this time a definitive answer as regards the markets served by Kent's soft sand extraction cannot be given. When the SEEWAP AM2014 report is available this will be clearer given that the import export balance with destinations will be detailed in the British Geological Survey report. The earlier SEEWAP AM2009 data is now rather old and should not be little weight in my view.

Katie Stewart

Director of Growth, Environment and Transport

Q8. West Sussex Mineral future Supply Options- Continuity of Soft Sand Supply

Kent has currently permitted reserves of 8.04 million tonnes (as of end of 2014) and a potential replenishment supply of 16.42 million tonnes. Predicted requirements over the life of the plan (until 2030) are 17 times 0.601 tonnes averaged per annum production, thus 10.2 million tonnes are required overall.

Total surplus could (if all the replenishment reserves were to come forward in a timely fashion over the life of the Plan) result in a surplus of 14.2 million tonnes. Thus there does appear to be a margin of flexibility available to Kent for the anticipated Plan period 2013-2030, and for Kent to have a wider role in supplying markets outside the County, subject to market demand. However, as indicated in response to Q5, a significant amount of the potential replenishment reserves are within one site (Shrine Farm, 8.0 million tonnes). This site is has been identified as a Preferred Options site, though it remains within the setting of the Kent North Downs AONB, a highly sensitive site in landscape terms. Before and further progress on the Mineral Sites Plan can re-commence an additional 'Call for Sites' consultation exercise will be undertaken, which will trigger a further assessment process.

If the County Council does not rely on the Shrine Farm reserve, then potential replenishment resources could, reduce from 16.42 million tonnes to 8.42 million tonnes, yielding a total potential reserve of 16.46 million tonnes. The Plan requirement of 10.2 million tonnes remains and thus the potential available surplus of 6.26 million tonnes may exist, rather than a surplus of 14.2 million tonnes. Kent's future role in the wider context of a net soft sand exporter may therefore not be as secure as it would at first appear. It would appear correct for West Sussex County Council to recognise the need to identify additional sites (Options SS1, SS2 and SS3) and not rely on a Kent import supply future scenario.

Options for Sharp Sand and Gravel-West Sussex Continuity of Supply

With regard to the options available to West Sussex County Council for the adequacy of future sharp sand and gravel aggregate supply, it is considered that if the NPPF places a priority in assessing and (if possible) securing a steady and adequate supply from landwon sources, therefore this should be pursued. If this is not possible, a sustainable approach is to increase substitution from secondary and recycled sources and then imports of such materials as marine dredged aggregates should be explored, thus affecting a steady and sustainable based supply of materials to the market.

Options for Secondary and Recycled Options

The NPPF caveats the requirement to take into account the contribution from this sector in overall aggregate supply "*so far as practicable*". Therefore, Options SRA1 and SRA2 do indeed appear practicable, in that they relate to planning policy. Options SRA 3 and SRA 4 relate more to how the private sector responds to policy,

Katie Stewart

Director of Growth, Environment and Transport

both locally and at the national scale, including the effect of primary aggregate taxation. Therefore, the objectives of Options SRA 3 and SRA 4 may be less appropriate to planning policy formulation.

Crushed Rock- Continuity of Supply in West Sussex

The lack of supply in West Sussex is understood. Therefore, crushed rock supply will have to be imported into the county's area. Kent has abundant reserves of limestone (Kentish Ragstone in the order of some 48 million tonnes) and it is not anticipated that an increase in demand from West Sussex will be likely to have a significant impact on the ability for Kent to meet its own needs.

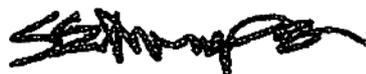
Marine Dredged Aggregates- Continuity of Supply in West Sussex

Kent County Council understands the imperative to safeguard all existing, planned and potential wharves in an area to ensure that the NPPF's requirement for marine dredged (and other materials) aggregates can be imported into an area to contribute to overall supply needs. Therefore, of the options West Sussex County Council are considering only Option W6 which seeks to *safeguard wharves in Eastern Harbour Arm at Shoreham (ARC Wharf, Hall Wharf, Tuberville & Penneys), Railway Wharf (Littlehampton); safeguarding of Britannia Wharf (and extension); and rely on 96ktpa general terminus capacity (2.29 mt capacity)* addresses the need for Plans to safeguard existing wharves, and those that there are planned and are potential wharves within the area.

The recent Examination Hearings into the Kent County Council's Minerals and Waste Local Plan 2013-30 (as modified) exposed the need to ensure that non-operational but potential wharfage is required to be safeguarded to in accordance with the NPPF. It is advocated that West Sussex County Council adopt the same approach.

I hope that clarifies the position, if you have any need of further information please do not hesitate to contact me again.

Yours sincerely



Sharon Thompson
Head of Planning Applications

Katie Stewart
Director of Growth, Environment and Transport

DtC20b – Response from Derbyshire County Council (February, 2016)

From: ETE Wastemin (Economy, Transport & Environment)
[<mailto:ETEWastemin@derbyshire.gov.uk>]
Sent: 01 February 2016 09:21
To: Rupy Sandhu
Subject: RE: Long term supply of crushed rock - Duty to Cooperate engagement

Dear Sir,

We have considered your letter dated 18 January 2016 regarding the future supply of aggregate crushed rock from Derbyshire to West Sussex.

Under the Duty to Cooperate, Derbyshire County Council will continue to liaise with individual authorities to discuss the future provision of aggregate, in particular the future movements of aggregate between specific areas. Although it appears that there are currently no reasons why exports of crushed rock for aggregate from Derbyshire to West Sussex will not continue at the current rate for the foreseeable future, this will be kept under review and discussed on an ongoing basis.

Kind regards,

Richard Stansfield | Senior Planner

Development Plans

Economy, Transport and Environment | Derbyshire County Council
Shand House, Dale Road South, Matlock, Derbyshire, DE4 3RY
01629 539816



DtC21a – Response from Leicestershire County Council (January, 2017)

Rupy

I refer to your letter of 24th January 2017 regarding the long term supply of crushed rock from Leicestershire to West Sussex.

My AM2014 survey records indicate that some 55,000 tonnes of crushed rock were exported to West Sussex from Leicestershire by rail.

I confirm that estimated permitted reserves of crushed rock in Leicestershire as at the end of 2015 were sufficient to last about 30 years based on the average rate of production over the last 10 years. A significant proportion of the permitted reserves are however at inactive sites which are not rail linked. As at the end of 2015, the four active quarries in the County (which are all rail connected) had a collective life of some 22 years based on the average rate of production over the last 10 years.

I am not aware of any planning reason why the continued export of crushed rock aggregate from Leicestershire to West Sussex could not be sustained at a similar level to 2033 should there be a market demand for this to continue.

My records indicate that all of the crushed rock transported by rail from Leicestershire to West Sussex was from Bardon Hill Quarry, which is operated by Aggregate Industries. In August 2011, Leicestershire County Council granted planning permission for the extraction of 132 million tonnes of mineral which has extended the life of the quarry by around 40 years.

Regards

Nigel Hunt
Principal Planning Officer
Planning, Historic and Natural Environment
Chief Executive's Department
Leicestershire County Council
County Hall Glenfield, Leicester LE3 8RA

Tel: 0116 3057042

Email: nigel.hunt@leics.gov.uk

From: Rupy Sandhu [<mailto:rupy.sandhu@westsussex.gov.uk>]

Sent: 24 January 2017 14:47

To: Planning Control

Subject: West Sussex Joint Minerals Local Plan - long term supply of Crushed Rock

Dear Sir/madam,

Please find attached a letter regarding the long term supply of crushed rock from Leicestershire to West Sussex, in the spirit of the Duty to Cooperate.

If you have any questions or queries please don't hesitate in contacting me.

Kind regards,
Rupy

DtC21b – Response from Cornwall County Council (January, 2016)

Mr Rupy Sandhu
Strategic Planning
County Hall
Chichester
West Sussex
PO19 1RH

Date: 30 January 2017

Dear Mr Sandhu

West Sussex Joint Minerals Local Plan – Long term supply of crushed rock.

Thank you for your letter regarding the above. I can confirm that as stated within the Cornwall Local Aggregate Assessment that Cornwall has a landbank of 140 years based on a 10 year average of current sales. Based on this 10 year average, Cornwall has sufficient permitted reserves in active quarries to meet our needs.

I hope this information is useful.

Kind regards

Yours sincerely,

Neil Hayhurst

Senior Development Officer

Cornwall Council
Strategic Policy Team
Pydar House, Pydar Street, Truro, TR1 1DT

Tel: 01872 224571

E-mail: nhayhurst@cornwall.gov.uk



DtC21c – Response from Somerset County Council (March, 2017)

Rupy Sandhu
Minerals and Waste Planning Team
West Sussex County Council

Sent by email to:
rupy.sandhu@westsussex.gov.uk

Sarah Povall
Economy and Planning
Somerset County Council
Taunton
Somerset
TA1 4DY

Email:
mineralsandwaste@somerset.gov.uk

21 March 2017

Dear Rupy,

West Sussex Joint Minerals Local Plan – long-term supply of crushed rock

Thank you for consulting Somerset County Council (SCC) with regard to the preparation of the West Sussex County Council and South Downs National Park Authority Joint Minerals Local Plan. Your letter of 24th January 2017 details three questions, which I am pleased to provide answers to, below.

1. ***The Somerset LAA (2005-14) states that there is a landbank of 29.9 years, which suggests sufficient supply to be able to continue to meet West Sussex needs to 2033. Would you agree with this statement?***

The Somerset LAA (2005-14) does outline a landbank of 29.9 years. The latest Somerset LAA (2006-15), which is currently being finalised for consultation next month, sets out a landbank of 28.4 years. The current data shows continued provision of a steady and adequate supply of crushed rock; and therefore indicates the ability for Somerset to continue to meet West Sussex's need until 2033.

2. ***Is there any reason why the supply of crushed rock from Somerset to West Sussex would not be able to continue to 2033?***

Based on the information and data currently available to us, there would appear to be no reason why Somerset could not continue to supply crushed rock to West Sussex until 2033.

3. ***Do you have any additional comments regarding the supply of crushed rock from Somerset to West Sussex which you feel we should be aware of?***

Somerset is a nationally significant provider of crushed rock, exporting to markets across the south of England, and policies set out in the Somerset Minerals Plan (adopted 2015) recognise this role.

I hope this information is helpful. Please do get in touch if you have any other queries.

Yours sincerely,

Sarah Povall
Senior Planning Policy Officer

DtC22 – Response from East Sussex County Council (January, 2016)

From: Tony Cook [<mailto:Tony.Cook@eastsussex.gov.uk>]
Sent: 25 January 2016 14:55
To: Rupy Sandhu
Cc: Sarah Iles
Subject: RE: Clay exports from ESCC to West Hoathly brickworks

Rupy,

Further to your email and in response to your questions, please see below:

Q1. Ibstock currently has four sites in East Sussex: Chailey Brickworks (active); Ashdown Brickworks (active); Little Standard Hill (implemented but no current extraction); and Horam Brickworks (implemented but no current extraction – the brick manufacturing development has not been commenced). The ability to supply the specific type of Wadhurst Clay required would have to be verified with the operator. There are two other active clay extraction sites within East Sussex, but these are for handmade tiles/bricks and, therefore, the reserves available are limited.

Q2. In relation to clay being supplied from Ashdown Brickworks and Little Standard Hill, please note the following:

- In relation to Little Standard Hill Farm, condition 2 of MR/11 states: *“The clay extracted from the site shall be used only for or in connection with the production of bricks or other clay products at the Ashdown Brickworks, except with the prior written approval of the Director of Transport and Environment.”* Therefore, in the event that Ibstock were to seek to remove this restriction, they would need to demonstrate that:
 1. The reserves were no longer needed in the long term at Ashdown brickworks; and
 2. That the proposals are acceptable in terms of WMP 18 (transport) and DM policies, particularly WMP25 (general amenity) and WMP 26 (traffic impacts).
- Ashdown Brickworks has a long history of brick making with records dating back to 1900. Various permissions have been granted, the latest relevant permission being MR/10 granted in 2003. The applicant estimated that there was sufficient reserves for the next 48 years. This permission allows the winning and working of minerals to 2052. Whilst there isn't anything specific relating to extracted clay not being permitted to be exported from Ashdown Brickworks, Condition 11 of MR/10 states: *“No topsoil or subsoil shall be sold or removed from the site for any other purpose.”* However, the reason for this is to ensure there is sufficient material for restoration purposes, rather than relating to clay that is extracted. There are also other conditions controlling the use of this site. It should be noted that the Highway Authority considered that the application proposed extraction and production rates at a constant level, so the traffic situation would not significantly change from existing levels. Accordingly, the Highway Authority did not object to the application

Q3. In relation to supplying minerals to adjoining areas, the NPPF contains the following references on the sourcing of clay:

“MPAs should plan for a steady and adequate supply of industrial minerals by co-operating with neighbouring and more distant authorities to co-ordinate the planning of industrial minerals (*includes clay*) to ensure adequate provision is made to support their likely use in industrial and manufacturing processes; provide a stock of permitted reserves to support existing plant for at least 25 years for brick clay, ...and taking account of the need for

provision of brick clay from a number of different sources to enable appropriate blends to be made." Previous national policy indicated that clay should be extracted as close as practicable to the brickworks that it supplies.

In terms of the East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan 2013 (WMP), Policy WMP 13 seeks to sustain the manufacture of brick, tile and clay products in the Plan Area. Resources at Ashdown Brickworks and Little Standard Hill are also safeguarded in the WMP. The Policies do not address the potential export of clay from existing sites, except in the case of use for flood defences. However, by implication and in terms of Policy WMP4 (sustainable minerals provision), the export of clay to a site outside the Plan area is likely not to be supported if it were to significantly prejudice the future of any of the existing sites in East Sussex by the substantial reduction of clay reserves available to that site and/or compromising restoration plans (Policy WMP 17). Sustainable transport and traffic issues are also key considerations at the Ashdown Brickworks site.

I hope this is of assistance to you.

Regards,

Tony

From: Tony Cook
Sent: 22 January 2016 17:25
To: 'Rupy Sandhu'
Cc: Sarah Iles
Subject: RE: Clay exports from ESCC to West Hoathly brickworks

Rupy,

We are still examining aspects of your request and we will send a response early next week.

Tony

From: Rupy Sandhu [<mailto:rupy.sandhu@westsussex.gov.uk>]
Sent: 15 January 2016 15:00
To: Tony Cook
Subject: Clay exports from ESCC to West Hoathly brickworks

Dear Tony,

I am aware that you spoke to Ian regarding clay being exported from East Sussex to West Hoathly brickworks yesterday.

To help WSCC/SDNPA progress the preparation of their Joint Minerals Local Plan I would be very grateful if you would respond to the questions below which relate to the possibility of clay being imported into West Sussex from East Sussex, to supply an existing Ibstock brickworks at West Hoathly. Currently the brickworks is supplied by clay from an adjacent excavation and WSCC/SDNPA are considering whether to allocate an extension to the brickworks in the Plan. An important factor in the authorities' assessment of the site's suitability is its location within the High Weald Area of Outstanding Natural Beauty and therefore its consistency with paragraph 116 of the NPPF. Responses to the following questions are needed to inform this assessment.

1. Are you aware of any sites within East Sussex County Council that could, theoretically, supply Wadhurst Clay to the brickworks at West Hoathly?
2. Ibstock have suggested that, at some point in the future, it may be possible for the brickworks to be supplied from their Ashdown and Little Standard Hill sites. With regard to this, are there any constraints (in East Sussex) which would hinder such activity and, if so would it be possible for these constraints to be overcome? (Please consider development management and supply constraints).
3. Please provide any other comments on the deliverability of West Hoathly brickworks being supplied by Imports of clay.

As we are hoping to consult on the draft Plan in the Spring a reply to these questions by Friday 22 January would be very much appreciate. Please accept this request as being made as part of the authorities' compliance with the Duty to Cooperate.

Yours sincerely

Rupy

<p>Rupy Sandhu Senior Planner - Minerals and Waste Policy, Residents' Services Directorate, West Sussex County Council Location: Ground Floor, Northleigh, County Hall, Chichester, PO19 1RH Internal: 26454 External: +44 (0)330 2226454 E-mail: rupy.sandhu@westsussex.gov.uk</p>
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**DtC23a – Correspondence with Marine Management Organisation
(November, 2016)**

Dear Sir/Madam,

West Sussex County Council and South Downs National Park Authority (the Authorities) are currently preparing a Joint Minerals Local Plan (JMLP). Once adopted this Plan will set out planning policy for the supply of minerals in West Sussex to 2033. The Marine Management Organisation were consulted on the draft JMLP (Regulation 18 stage) which took place between April and June 2016. The Proposed Submission West Sussex JMLP will be published for a period of representations in January 2017.

Evidence from the West Sussex Local Aggregate Assessment (<https://www.westsussex.gov.uk/about-the-council/strategies-plans-and-policies/environment-planning-and-waste-plans-and-policies/minerals-and-waste-policy/local-aggregate-assessment/>) shows that the vast majority of sharp sand and gravel is currently supplied from marine dredged aggregate landed at Shoreham Port. The strategy for the provision of sharp sand and gravel in the JMLP is therefore not to allocate additional land won sharp sand and gravel sites as current needs are being met from marine dredged sources and this is expected to continue over the plan period.

Please could you confirm whether the MMO have any comments to make on the strategy for sharp sand and gravel that is proposed in the JMLP and whether you have any additional comments to make on the plan.

Kind regards

Eleanor Harman
Senior Planning Officer
Minerals and Waste Policy

[Eleanor Harman](#) | Senior Planner, Minerals and Waste Policy
(Part Time: Mon, Tues and Weds 9.30-2.30),
Residents' Services Directorate, [West Sussex County Council](#) |
Location: Ground Floor, Northleigh, Chichester, PO19 1RG
Internal: 26440 | External: 0330 22 26440 | E-mail:
eleanor.harman@westsussex.gov.uk

DtC23b – Response from Marine Management Organisation (November 2016)

Thank you for including the MMO in your recent consultation submission. The MMO will review your document and respond to you directly should a bespoke response be required. If you do not receive a bespoke response from us within your deadline, please consider the following information as the MMO's formal response.

Kind regards,

The Marine Management Organisation

Response to your consultation

The Marine Management Organisation (MMO) is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are; marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing European grants.

Marine Licensing

Activities taking place below the mean high water mark may require a [marine licence](#) in accordance with the [Marine and Coastal Access Act \(MCAA\) 2009](#). Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence. You can also apply to the MMO for consent under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts in England and parts of Wales. The MMO is also the authority responsible for processing and determining harbour orders in England, and for some ports in Wales, and for granting consent under various local Acts and orders regarding harbours. A wildlife licence is also required for activities that that would affect a UK or European protected marine species.

Marine Planning

As the marine planning authority for England the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. Marine plans will inform and guide decision makers on development in marine and coastal areas. On 2 April 2014 the [East Inshore and Offshore marine plans](#) were published, becoming a material consideration for public authorities with decision making functions. The East Inshore and East Offshore Marine Plans cover the coast and seas from Flamborough Head to Felixstowe. For further information on how to apply the East Inshore and Offshore Plans please visit our [Marine Information System](#). The MMO is currently in the process of developing marine plans for the South Inshore and Offshore Plan Areas and has a requirement to develop plans for the remaining 7 marine plan areas by 2021.

Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure that

necessary regulations are adhered to. For marine and coastal areas where a marine plan is not currently in place, we advise local authorities to refer to the [Marine Policy Statement](#) for guidance on any planning activity that includes a section of coastline or tidal river. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the [Marine and Coastal Access Act](#) and the UK Marine Policy Statement unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our [online guidance](#) and the [Planning Advisory Service soundness self-assessment checklist](#).

Minerals and waste plans and local aggregate assessments

If you are consulting on a mineral/waste plan or local aggregate assessment, the MMO recommend reference to marine aggregates is included and reference to be made to the documents below:

- The Marine Policy Statement (MPS), section 3.5 which highlights the importance of marine aggregates and its supply to England's (and the UK) construction industry.
- The National Planning Policy Framework (NPPF) which sets out policies for national (England) construction minerals supply.
- The Managed Aggregate Supply System (MASS) which includes specific references to the role of marine aggregates in the wider portfolio of supply.
- The National and regional guidelines for aggregates provision in England 2005-2020 predict likely aggregate demand over this period including marine supply.

The NPPF informed MASS guidance requires local mineral planning authorities to prepare Local Aggregate Assessments, these assessments have to consider the opportunities and constraints of all mineral supplies into their planning regions – including marine. This means that even land-locked counties, may have to consider the role that marine sourced supplies (delivered by rail or river) play – particularly where land based resources are becoming increasingly constrained.

If you wish to contact the MMO regarding our response please email us at consultations@marinemanagement.org.uk or telephone us on 0300 123 1032.

The Marine Management Organisation (MMO)

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DtC24 – Notes of meeting with Planning Policy Officers Group (March, 2016)

Planning Policy Officers Group
Notes of meeting - 8th March 2016

Extract from the notes of the meeting relating to the minerals safeguarding discussion

Attendees

Arun – Neil Crowther
CBC – Elizabeth Brigden
CDC – Mike Allgrove
CDC - Tracey Flitcroft
EA – Hannah Packwood
HDC – Catherine Howe
MSDC – Andy Marsh
SDNP – Sarah Nelson
WBC – Ian Moody
WSCC – Caroline West
WSCC – Ian Blake
WSCC – Eleanor Harman
WSCC – Cali Sparks

Apologies for absence

SDNP – Lara Southam (Sarah Nelson to attend)
Adur – Moira Hayes (WBC covered by Ian Moody)

2) Minerals Safeguarding presentation and discussion – policy approach with Districts and Boroughs across West Sussex

- Ian Blake and Eleanor Harman gave a presentation on the draft mineral safeguarding policy and proposed annex, which sets out how in practice this policy is proposed to work.
- The NPPF sets out that Minerals are essential to support sustainable economic growth and our quality of life. It is therefore important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation. The draft policy and annex aid Local Planning authorities, when determining planning applications, in meeting the requirement of the NPPF paragraph 144 to ‘not normally permit other development proposals in mineral safeguarding areas where they might constrain potential future use for these purposes’
- Regarding the draft policy, what safeguarding is and why it is important was set out, what work has been undertaken to identify areas of minerals to be safeguarded in the county, including the balance of needs and proposed development and the geological work. It was set out that the maps identifying the Minerals Safeguarded Areas (MSA’s) will be out for consultation in April –June. Some Councils already set out that the map layer, once Adopted, will be added to Proposals Maps like allocations of minerals and waste sites.
- The process, as set out in the draft annex, once an application is received, was discussed including how and what applications WSCC should be consulted upon. If consulted WSCC would consider if a Minerals Resource Assessment was needed, which would be considered by WSCC if required. Early discussion including pre-application where applicable was discussed, as well as the practicalities of consulting WSCC on applications and the speed needed for comments on planning applications.

- The Minerals Local Plan is programmed for Regulation 18 consultation between the 14th April – 10th June 2016. Initial comments were requested from Policy and Development Management Teams on the draft Policy and Annex. Most councils sent in comments, which were gratefully received and are being considered by the team along with comments set out at the meeting.
- Meetings are being set up with local authorities who have proposed site allocation(s) or a particular issue which need to be discussed. If you wish to discuss and or meet with the minerals plan team to discuss the draft plan, please contact Rupy Sandhu on rupy.sandhu@westsussex.gov.uk or 0330 2226454.

Action: All to send initial comments (Policy and DM if possible) by 18th March.

DtC25 – Notes of Meeting with Planning Policy Officer’s Group (March, 2017)

Planning Policy Officers' Group

Wednesday 8 March 2017 10.00 am

Action Points

EXTRACT OF NOTES FROM MEETING COVERING MINERALS SAFEGUARDING

1) Welcome and apologies for absence

Apologies:-

- Ian Moody (Moirra Hayes representing Adur and Worthing)
- Neil Crowther

Attendees:-

- Caroline West - WSCC
- Eleanor Harman - WSCC
- Ray Drabble - WSCC
- Mike Appleton - CDC
- Andrew Marsh - MSDC
- Elizabeth Brigden - CBC
- Catherine Howe - HDC
- Mark McLaughlin - HDC
- Hannah Hyland - EA
- Moira Hayes - Adur
- Katharine Stuart – SDNP

2) Draft Minerals Safeguarding update (papers to be attached)

- Reg 19 closes on 13th March. Agreed an extension for comments on the draft minerals safeguarding guidance, if required up to the 24th March.
- GIS layers will be made available for Policies Maps once plan adopted.
- It was suggested that some training sessions for D&B DM officers may be useful once adopted.

DtC26 - JAAP Planning Project Team Minutes (13 September, 2013)



**Minutes of Planning Policy Workstream
Hove Town Hall – 10am – 13 September 2013**

Attendees:

- Colette Blackett (ADC)
- Jane Fuller (ADC / BHCC / WSCC)
- Mike Holford (BHCC)
- Catherine McLeod (EA)
- Rupy Sandhu (WSCC)
- Steve Tremlett (BHCC)
- Lucy Seymour-Bowdery (WSCC)
- Sam Sykes (ADC / BHCC / WSCC)
- Pat Randall (ESCC)
- Alethea Evans (WSCC)
- Chris Jones (ADC / BHCC / WSCC)

Matters Arising:	Action
1. Apologies	
<ul style="list-style-type: none"> • Moira Hayes (ADC) • Darryl Hemmings (WSCC) • Jane Proctor (ADC) 	
2. Minutes From Last Meeting	
Minutes agreed with the following notes:	
The Morrisons and PortZed applications have now been approved.	
Parking standards and flood risk will be raised at the next Project Board.	

3. Wharves and Railheads study	
<p>The study has now been completed. It presents five scenarios for the safeguarding (or not) of the wharves in the part of the port in West Sussex. These are to be discussed with the partner authorities and a preferred option selected. WSCC is now drafting a MoU or SCG with the Port Authority, ADC, BHCC and ESCC. This will be in place by the time consultation starts in February.</p> <p>Brighton & Hove and East Sussex are reliant on imports from the harbour. The Waste and Minerals Plan relies on the JAAP to resolve issues of capacity at the harbour.</p> <p>Ferry Wharf is proposed for employment use in the Development Brief. If the Western Arm is released from safeguarding, this wharf may need to be safeguarded for future capacity. However, it is in Port Authority ownership and they may be able to develop for other uses under permitted development rights.</p> <p>The EMR site is not used as a wharf at present but has been in the past. It therefore has theoretical potential to be brought back into use.</p> <p>Agreed that JAAP should not be used to set Minerals Policy and that should be left to the Minerals Local Plans. Suitable background wording for the JAAP will be agreed this week.</p>	Alethea / Rupy / Pat
4. Joint Area Action Plan	
<p>JAAP is being prepared for submission to all councils' Democratic Services on Wed 18 December. To be sent to ESCC before going to committees.</p>	Jane / Chris
5. Update on Local Plans	
<p><i>ESCC/SDNPA/BHCC Minerals and Waste Plan</i> – Will be consulting on a shortlist of waste sites.</p>	
<p><i>BHCC City Plan</i> – Examination now complete. Expecting letter from inspector at the end of this week. There are a number of modifications and further work needed on the urban fringe.</p>	
<p><i>WSCC Minerals Plan</i> – Reg 18 consultation will take place in 2014.</p>	
<p><i>ADC Local Plan</i> – The 2nd round of Reg 18 consultation has ended. Around 900 reps received mostly relating to the</p>	

<p>development of greenfield sites, infrastructure, flood risk and transport.</p> <p>Harbour related reps include Cemex, EMR and Carats café.</p>	
6. Transport Study and Strategy	
<p><i>Shoreham Town Centre Study</i> – Being finalised. Some longer term measures are not fully understood and this needs to be better communicated to members and public.</p>	Lucy
<p><i>Transport Strategy</i> - Sections 1 – 4 have been circulated for comments. A short paper will be submitted to committees with the JAAP.</p>	Lucy
7. Flood Risk (including Technical Guidance)	
<p><i>Technical Guide</i> – The Condition Survey work for this guidance will be undertaken by the Port Authority. This will be reported at the end of January 2014.</p> <p>The brief for the other two sections of the guide (the Options Appraisal report dealing with designs and costs; and the Guidance document setting out preferred styles and approach) will be updated. This work will be commissioned through an open tender approach. Help from technical services once the commission starts is required.</p> <p>A Marine Licence from the Marine Management Organisation will be required for any development affecting the intertidal zone – engagement has started with them.</p> <p>There is a significant funding gap for the Adur Tidal Walls scheme. EA meeting with LEP to discuss.</p> <p>Morrisons developer will be providing defences for their section of the waterfront.</p>	<p>Sam</p> <p>Colette to raise at Project Board</p>
8. Developer Contributions / CIL	
<p><i>ADC</i> – A whole plan viability assessment will be undertaken. Further work is required on CIL, but this may not be appropriate for strategic sites.</p> <p><i>BHCC</i> – B3 potential CIL zones have been identified with 3 charging rates. No CIL is likely for Shoreham Harbour</p>	
9. Update on Development Implementation Group	

CCF expression of interest due in February, CAMIS – Aldrington Basin Delivery Study – finished and to be presented to Project Board Wellington Road improvements to be discussed at Project Board Decoy Farm – brief for site work not yet signed off. Gary Baines has been appointed as Fort Co-ordinator for a year from January 2014. The Port Authority will host this post.	Clare Mangan James Appleton
10. Planning Applications	
<i>PortZED</i> –Approved	
<i>Morrisons</i> - Approved	
<i>Lidl</i> – Application expected early 2014 for part of Malthouse Estate	
11. Duty to Co-Operate	
None	
12. Risk Log	
Jane to circulate.	Jane
13. AOB	
None	
14. Date and Venue / Items for next meeting	
<ul style="list-style-type: none"> Next meeting: 21 January, Sussex Room, Portland House. Future meetings to be arranged 	Chris.

DtC27 – JAAP Planning Project Team Minutes (December, 2013)

From: Alethea Evans [<mailto:alethea.evans@westsussex.gov.uk>]
Sent: 12 December 2013 10:58
To: mike.holford@brighton-hove.gov.uk; Pat Randall
Cc: Tony Cook; Steve Tremlett (Steve.Tremlett@brighton-hove.gov.uk); Jane Fuller (Jane.Fuller@adur-worthing.gov.uk); Rupy Sandhu; Lucy Seymour-Bowdery
Subject: Shoreham Port: Safeguarding and SoCG

Mike and Pat,

As you are aware, during the JAAP Planning Policy Sub Group on Tuesday morning in Hove, the topic of mineral safeguarding at the Port and the outcomes of the W&R Study were discussed in detail.

I am sure Pat has relayed this information already, but just for confirmation:

- the emerging Minerals Local Plan has been confirmed by WSCC as the vehicle to be used to set the safeguarding policy relevant to the Plan area including Shoreham Port;
- The JAAP is approaching draft stage, with consultation under regulation 18 due to commence in February 2014, it currently proposes regeneration on the Western Arm, which would make the continued safeguarding of mineral sites very difficult, and therefore these business are proposed to be moved to the Eastern Arm. This is set out in the Development Briefs;
- WSCC wishes to take a pragmatic and evidenced based approach to safeguarding on the Port, to support the JAAP and to ensure the long-term provision of mineral wharves to serve demand. This will include safeguarding of specific sites on the Eastern Arm and the commitment to the use of general wharf to provide additional capacity, similar to the approach with the adopted Waste and Minerals Local Plan for East Sussex. This will offer both level of certainty and flexibility which will be so important at EiP.

It was agreed that the partner authorities would work towards the sign off of Statement of Common Ground which will set the direction of travel for planning decisions relating to mineral safeguarding on the Port, in advance of the adoption of the West Sussex Minerals Local Plan and the JAAP. Parties to the Statement were suggested to include Adur, WSCC, ESCC, B&H and Shoreham Port Authority.

Broadly the Statement will include:

- Introduction & confirmation of the role of the Parties
- Purpose
- Aims
- Limitations

- Background (the outcome of the W&R Study, relevant facts about mineral movement/demand, the Harbour Development Briefs)
- Agreements between the Parties (inc various commitments to actions/activities, based on the background)
- Timescales

We are in the process of drafting the SoCG and I feel that it is essential that you engage with this process, given your comments during the pre-meeting on Tuesday morning. I hope to be in a position to circulate a draft version of the SoCG soon, in the meantime it would be useful if you would start to pull together the evidence of demand for minerals brought in through Shoreham Port, which we can then use as a basis for the decision around the level of safeguarding required. In particular I believe the following would be useful:

1. Confirmation of the approach to mineral safeguarding on the Eastern Arm within B&H- will the Waste and Mineral Site Allocations Plan safeguard specific sites?
2. Your comments or suggested changes to the statement: *The parties recognise the demand for minerals landed at Shoreham to the supply of minerals to Authorities to West Sussex. In particular, the likely increased reliance on minerals (both land won and marine dredged) landed at Shoreham by East Sussex, resulting from the reduced availability of land won sources within the County. This level of demand and reliance has been difficult to quantify but is considered not to fall outside the peak demand experienced over the past 10 years. Of course, if you consider the demand is likely to be greater, it will be essential for you to quantify this as this will stimulate further consideration of the approach and direction of travel.*

Jane Fuller is keen to progress the development of the SOCG in advance of the consultation on the draft JAAP and therefore I would welcome your comments sooner rather than later.

Kind Regards

Alethea

Please note new telephone number

<p>Alethea Evans Senior Minerals and Waste Planner, West Sussex County Council Location: Northleigh, County Hall, Chichester, PO19 1QT Internal: 26435 External: 03302 226435 E-mail: alethea.evans@westsussex.gov.uk</p>
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DtC28 – Shoreham Harbour Statement of Common Ground (24 April, 2014)

**Statement of Common Ground between the Shoreham Harbour Planning Authorities and the Shoreham Port Authority
April 2014**

1. Introduction

1.1 The parties to this Statement of Common Ground are:

Adur District Council
Brighton & Hove City Council
East Sussex County Council
West Sussex County Council
South Downs National Park Authority
Shoreham Port Authority

1.2 The Parties are responsible for the development of Local Planning Documents as relevant to this Statement:

- Brighton & Hove City Plan – Brighton and Hove City Council
- East Sussex Minerals and Waste Plan – produced jointly by East Sussex County Council, Brighton & Hove City Council and the South Downs National Park Authority;
- West Sussex Minerals Local Plan – produced jointly by West Sussex County Council and the South Downs National Park Authority
- Adur Local Plan- produced by Adur District Council
- Shoreham Harbour Joint Area Action Plan (JAAP) – produced jointly by the Shoreham Harbour Regeneration Partnership comprising Adur District Council, Brighton & Hove City Council, West Sussex County Council and Shoreham Port Authority.

1.3 Brighton & Hove City Council and West Sussex County Council are Mineral Planning Authorities, responsible for minerals planning. in their parts of Shoreham Harbour, in line with the requirements of national planning policy. East Sussex County Council and the South Downs National Park Area are neighbouring Mineral Planning Authorities, leading on the preparation of mineral and waste planning policy documents in partnership with Brighton & Hove City Council, which covers the part of Shoreham Harbour within Brighton & Hove. Shoreham Port Authority is the landowner and operator of Shoreham Port. Adur District Council is the local planning authority for the area of Shoreham Harbour that is located within West Sussex, and is responsible for local planning matters within Shoreham Harbour (alongside West Sussex County Council).

- 1.4 Adur District Council, Brighton & Hove City Council, West Sussex County Council and Shoreham Port Authority are partners in the preparation of the Shoreham Harbour Joint Area Action Plan (JAAP). The vision contained in the draft JAAP for the next 15 years is to maximise the potential of Shoreham Harbour for the benefit of existing and new residents, businesses, port-users and visitors through a long term regeneration strategy. This will be achieved through working with local landowners and business to facilitate the redevelopment of key sites.
- 1.5 The aim of the JAAP is to deliver a series of appropriately located, high quality, sustainable, mixed-use developments including new housing, employment floorspace, leisure opportunities, improved public space and associated infrastructure including flood defences and transport improvements. The regeneration proposals will be facilitated by consolidating, reconfiguring and enhancing the operations of Shoreham Port.
- 1.6 A key issue for the Planning Authorities and Shoreham Port Authority is the presence of active and inactive mineral wharves and waste management facilities in the geographical area covered by the JAAP. Paragraph 143 of the National Planning Policy Framework requires local planning authorities to safeguard existing, planned and potential wharfage for bulk transport of minerals.
- 1.7 Policy WMP15 of the adopted East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan aims to safeguard existing, planned and potential railhead and minerals wharf facilities (including rail sidings), and their consequential capacity. In line with Policy WMP 15, in order for proposals for alternative uses at mineral wharves within Brighton & Hove to be acceptable, evidence would need to demonstrate that there would be no net-loss of potential capacity for handling minerals within the Port as a whole. Appropriate flexible arrangements could be used to compensate for the loss of capacity at a specific wharf, such as the use of existing common user terminals within the Port for minerals use.
- 1.8 The West Sussex Minerals Local Plan (2003) safeguards the following wharves through Policy 40:
1. Free Wharf;
 2. Kingston Wharf;
 3. Turberville and Penney's Wharf;
 4. Western part of Halls Wharf and
 5. Brighton Power Station 'A' Wharf and RMC Roadstone Wharf (now known as ARC Wharf and Rombus Wharf respectively).

1.9 Additionally, Policy 41 identifies a new wharf at Littlehampton.

1.10 It is envisaged that the regeneration project will bring forward proposals for alternative land uses on some of these sites alongside relocation of existing businesses, particularly away from the Western Harbour Waterfront area where mixed use development is proposed. Sufficient capacity to meet the demand for transportation of minerals is to be provided at wharves elsewhere in the Port. This is dependent on a change to the West Sussex County Council policy on wharf safeguarding, which will be included in the new West Sussex Minerals Local Plan and will be tested through an examination in public before it can be adopted in 2016.

2. Purpose

2.1 The purpose of this Statement of Common Ground is to underpin effective cooperation and collaboration between the parties listed above in addressing strategic cross-boundary issues as they relate to planning for minerals infrastructure and safeguarding in Shoreham Harbour.

2.2 It sets out matters of agreement and commitment to a future policy approach, reflecting the spirit of co-operation between the parties to the Statement. It is, however, not intended to be legally binding or to create legal rights.

2.3 The Statement sets out the current evidence available to the parties at the time of preparation, the evidence will continue to build upon this evidence through the development of emerging Local Plans.

3. Aims

3.1 The Statement has the following broad aims:

- to set out the commitment of each of the parties to an approach to mineral safeguarding in line with NPPF at Shoreham Harbour, recognising commercial considerations of the Port and the regeneration aspirations of the JAAP;
- to indicate the approach to be taken by all parties to delivering this commitment.

4. Limitations

4.1 The Parties to the Statement recognise that there will not always be full agreement with respect to all of the issues on which they have a duty to

cooperate. For the avoidance of doubt, this Statement shall not fetter the discretion of any of the Parties in relation to any of its statutory powers and duties, and is not intended to be legally binding.

- 4.2 The approach to mineral safeguarding will be tested upon submission to the Secretary of State through an examination in public on the West Sussex Mineral Local Plan and through implementation of Policy WMP15 of the adopted East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan. The Shoreham Harbour JAAP will bring forward alternative land uses, facilitate regeneration and associated infrastructure.

5. Background

- 5.1 The current West Sussex Minerals Local Plan was adopted in 2003. Policies 36 to 41 have been saved, safeguarding existing and potential wharves and railheads within the County. West Sussex County Council, in partnership with the South Downs National Park Authority, has commenced preparation of a new Minerals Local Plan, which will replace the currently adopted version. To provide evidence for a new policy on wharf safeguarding, the County Council and South Downs National Park Authority recently commissioned a West Sussex Wharves and Railheads Study which investigated a range of potential scenarios and assessed them in respect of historic demand. It is proposed that Scenario W3 is taken forward as the preferred policy approach as this would safeguard dedicated mineral wharf capacity to cater for future demand in line with sales over the previous 10 years. This Scenario would result in the safeguarding of three wharves: Turberville and Pennys Wharf, ARC Wharf and Halls Wharf. Scenario W3 also best supports the regeneration plans included within the JAAP.
- 5.2 In the future, should demand arise for additional capacity which cannot be met on safeguarded mineral wharves, then this demand would be met at other common user terminals (i.e. not used exclusively for minerals) within the Port. It is anticipated that any changes in demand will be identified through evidence included within Local Aggregate Assessments as prepared by Mineral Planning Authorities.
- 5.3 Brighton & Hove City Council have prepared a Waste and Minerals Plan (2013) in partnership with East Sussex County Council and the South Downs National Park Authority. Policy WMP15 aims to safeguard existing, planned and potential railhead and minerals wharf facilities (including rail sidings), and their consequential capacity. In line with Policy WMP 15 of the adopted East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan, in order for proposals for alternative uses at mineral wharves within Brighton & Hove to be acceptable, evidence would need to demonstrate that there would be no net-loss

of potential capacity for handling minerals within the Port as a whole. Appropriate flexible arrangements could be used to compensate for the loss of capacity at a specific wharf, such as the use of existing common user terminals within the Port for minerals use.

- 5.4 The East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan does not identify any specific railheads or wharf facilities for safeguarding.
- 5.5 The Shoreham Harbour Interim Planning Guidance (August, 2011) was prepared by the Shoreham Harbour Regeneration Partnership. The Interim Planning Guidance states that a key factor in considering new development and changes of use in the Harbour area which will be taken into account is the impact of development on safeguarded wharves and existing waste facilities, and the extent to which the development contributes to meeting future needs for minerals imports and waste management.
- 5.6 The Shoreham Harbour Regeneration Partnership has prepared two Development Briefs for the proposed areas of change in Shoreham Harbour. The Western Harbour Arm Development Brief was adopted by Adur District Council in July 2013. The South Portslade Industrial Estate and Aldrington Basin Development Brief was adopted by Brighton & Hove City Council in September 2013.
- 5.7 The Western Harbour Arm Development Brief states, in paragraph 5.2.5, for example, that: Adur District Council, Shoreham Port Authority, Brighton & Hove City Council, West Sussex County Council and East Sussex County Council are committed to working together to ensure that an appropriate policy approach is incorporated within the updated West Sussex Minerals Local Plan and the JAAP; and that in the short term any applications for alternative development proposals on safeguarded mineral wharves or adjacent sites will need to clearly demonstrate that there will be no net-loss to capacity for the import of aggregates at the Port as a result of any proposals.

6. Agreements between the Parties

- 6.1 The Parties recognise the importance of mineral wharf capacity at Shoreham Port and support the safeguarding of both specific sites and more general capacity for landing of minerals at the Port.
- 6.2 The parties recognise the importance of aggregate wharves at Shoreham to the supply of minerals to West Sussex, East Sussex, Brighton & Hove and other areas in the South-East. In particular, there is likely to be an increased reliance on minerals (both land won and marine dredged) landed at Shoreham from East Sussex and Brighton & Hove, resulting from the potential reduced availability of

land won sources within, and imports to, East Sussex. This level of demand and reliance in the future is difficult to quantify because of the unknown effect of factors impacting on potential supply to the County. However, increases in demand will be catered for by building flexibility into future wharf capacity arrangements at the Port.

- 6.3 The parties recognise the role of Shoreham Port Authority in assisting with both the short and long term demand for mineral landings at common user terminals in the Port Operational Area.
- 6.4 The parties recognise the regeneration aspirations for the Harbour, to be delivered through the JAAP, which will broadly result in the redevelopment of the Western Harbour Waterfront for mixed-uses and the concentration of port activities on the Eastern Arm.
- 6.5 The parties recognise the conclusions of the West Sussex Wharves and Railhead Study (2013) which sets out the following:
 - Mineral landings at the Port over the past 10 years peaked at 1,621,000 tonnes;
 - Mineral landings at the Port peaked in 1989/1990, at 1,721,000 tonnes;
 - Scenario W3 would result in the safeguarding of 1,625,000 tonnes of capacity as a minimum, at three wharves: Turberville and Pennys Wharf, ARC Wharf and Halls Wharf, and would enable the delivery of the JAAP aspirations in relation to the redevelopment of the Western Arm.
- 6.6 In examining the conclusions of the West Sussex Wharves and Railhead Study (2013), Shoreham Port Authority have concluded that additional flexible capacity for mineral landings on the port operational area to the east could be provided over and above the safeguarded sites listed within Scenario W3. The amount of capacity required to meet the highest peak in demand experienced in 1989/1990 is 96,000 tonnes per annum. This capacity will be provided at common user terminals that currently utilise necessary loading/landing infrastructure, including cranes etc to land minerals at the Port.
- 6.7 The Shoreham Port Masterplan includes a commitment to improvements to Port facilities, including the expansion of wharves through infilling activity, which would result in an increase in throughput capacity including Turberville Wharf and Britannia Wharf.

6.8 Actions and Activities

6.9 In order to facilitate the JAAP process:

- West Sussex County Council and the South Downs National Park Authority will progress the development of the Minerals Local Plan; it is proposed to include a policy on safeguarding of wharves in line with Scenario W3 of the West Sussex Wharves and Railhead Study (2013), unless an alternative approach is supported by evidence. This will include both the allocation of specific sites and also recognition of the importance of common user terminal capacity on the Eastern Arm.
- In line with Policy WMP 15 of the adopted East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan, in order for proposals for alternative uses for wharves within Brighton & Hove to be acceptable, evidence would need to demonstrate that there would be no net loss of potential capacity for handling minerals within the port as a whole. Appropriate flexible arrangements could be used to compensate for the loss of capacity at a specific wharf, such as arrangements for the use of common user terminals within the port for minerals use.

6.10 Shoreham Port Authority commits to:

- The delivery of port improvement works which would increase the capacity of existing minerals wharves in the Eastern Arm as identified in the Port Masterplan (subject to securing the relevant permissions and commercial considerations);
- Making available the common user terminals at Brighton Terminal and Outer Lay-by Terminal for importing a minimum of 96,000 tonnes of minerals in any one year if needed.

6.11 In order to facilitate the development management process, particularly for Adur District Council, West Sussex County Council will seek to engage with the development management process consistent with their role as the Mineral Planning Authority. Where applications seek redevelopment of sites on the Port, the County Council will base their response on the safeguarding approach as set out within Scenario W3 of the West Sussex Wharves and Railhead Study 2013 and with the aims of the JAAP.

6.12 This approach is likely to result in redevelopment of wharves that are currently safeguarded through the West Sussex Minerals Local Plan (2003) as opportunities arise. These wharves are Free Wharf and Kingston Railway Wharf.

6.13 These sites would not cease to be safeguarded until the adoption of the new West Sussex Minerals Local Plan, scheduled to occur in 2016.

6.14 The Mineral Planning Authorities party to this Statement will continue to collaborate on these matters and evidence the approach set out within this through the preparation of Local Aggregate Assessments. The Mineral Planning Authorities will continue to liaise with other Mineral Planning Authorities in the South East in relation to the general matters set out in the Statement, in particular, the challenge associated with land won aggregates.

7. Timescale

7.1 The Statement of Common Ground is intended to run from April 2014 until it is replaced by an updated Statement or until the adoption of the relevant Local Planning Documents being prepared by the Parties, particularly the West Sussex Minerals Local Plan.

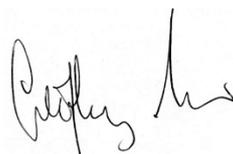
8. General

8.1 The terms of this Statement may be amended at any time by agreement in writing between the Parties.

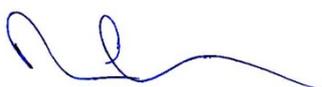
9. Signatures



Cllr Pat Beresford
Cabinet Member for Regeneration
Adur District Council



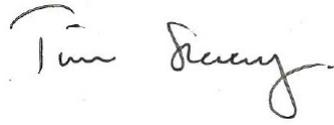
Geoffrey Raw
Executive Director, Environment,
Development & Housing
Brighton & Hove City Council



Rupert Clubb
Director of Communities,
Economy & Transport
East Sussex County Council



Pieter Montyn
Cabinet Member for Highways
and Transport
West Sussex County Council



Tim Slaney
Director of Planning
**South Downs National Park
Authority**



Peter Davis
Development Director
Shoreham Port Authority

DtC29 – Email on Draft LAA and approach to safeguarding to East Sussex County Council and Brighton & Hove City Council (October, 2015)

From: Tony Cook [<mailto:Tony.Cook@eastsussex.gov.uk>]
Sent: 30 October 2015 17:39
To: Rupy Sandhu
Cc: Pat Randall; 'Steve Tremlett'
Subject: RE: West Sussex Minerals Local Plan - LAA/Reasonable alternatives

Rupy,

Pat and Steve are content that the safeguarding wharves options offer capacity which more reflects our desired aim.

I hope this assists to allow you to complete a draft LAA.

Thanks,

Regards

Tony

From: Rupy Sandhu
Sent: 26 October 2015 15:58
To: 'Pat Randall'; 'Steve Tremlett'
Cc: 'Tony Cook (tony.cook@eastsussex.gov.uk)'; 'Ian Blake'
Subject: RE: West Sussex Minerals Local Plan - LAA/Reasonable alternatives

Dear Pat,

Please find attached a draft copy of our LAA. We are still finalising it in preparation for consultation with SEEAWP and are hopeful that you will be able to consider the information within it this week in advance of the deadline set by Tony (as Chair of SEEAWP) to get it completed.

The Appendices are still being prepared, however I can confirm that a review of housing data has shown an increase in planned housing (to 15.9%) which has now been applied. The highways data remains unchanged.

Table 21 of the LAA sets out the main outcomes of the study, and in relation to wharves, you will see that there is still a surplus in capacity (based on operational existing wharves). The reasonable alternatives I sent you last week would all allow for anticipated demand to be met (which takes account of B&H and ES needs also).

I look forward to hearing back from you.

Kind regards,

Rupy

[Rupy Sandhu](#) | Planner - Minerals and Waste Policy, Residents' Services Directorate, [West Sussex County Council](#)
Location: Ground Floor, Northleigh, County Hall, Chichester, PO19 1RH
Internal: 26454 | External: +44 (0)330 2226454 | E-mail: rupy.sandhu@westsussex.gov.uk

DtC30 – Note of meeting with ESCC and B&H (January, 2016)

West Sussex Joint Mineral Local Plan

NOTE OF MEETING

Shoreham wharves, safeguarding, Joint Minerals Local Plan

Friday 08 January 2016, 11:30 – 13:00, County Hall, East Sussex.

Meeting attendees

Tony Cook (ESCC)
Pat Randall (ESCC)
Steve Tremlett (B&HCC)
Darryl Hemmings (WSCC)
Rupy Sandhu (WSCC)

Note of meeting

General JMLP Update and discussion

DH provided a general update on progress being made on the JMLP;

- The West Sussex Local Aggregate Assessment was agreed in November 2015 at SEEAWP.
 - ESCC & B&HCC have no further comments on the draft LAA (November 2015)
- The draft JMLP will be subject to consultation (Regulation 18) during April-May 2016.

Land won aggregates

TC requested an update on soft sand position;

- DH/RS set out the following;
 - That Soft Sand demand (as set out in draft LAA) is 7.6mt, with a shortfall (total demand – reserves) of 4.6mt.
 - The JMLP will not be able to meet this need due to constrained supply (the majority of the soft sand is located within the SDNP)
 - Duty to Cooperate engagement with a number of nearby Authorities has indicated that there is a sufficient supply elsewhere in the region.
 - There appear to be no exceptional circumstances for site allocations in the SDNP
- TC stated that market distances for soft sand are a concern – historically aggregates don't travel great distances.
- There are two sites in East Sussex (Ditchling) and Novington (sharp sand and gravel)
 - RS explained that DtC engagement has been undertaken and will be producing evidence to show market areas from existing sites.
- There was a general discussion about soft sand extraction from sea in future. TC stated that this could increase demand for use of wharves at Shoreham if this becomes a viable option in future.

An update on landwon sharp sand and gravel position was provided (RS/DH);

- That sales are low, with existing site (Kingsham) being sufficient to meet demand based on latest LAA.
- Have no intention to allocate sites.

Wharves

RS provided a brief summary of WSCC's position on wharves;

- That the total expected demand for aggregate wharves could be as high as 1.34mtpa (taking into account other relevant local information)
- That the capacity set out in the 2014 Wharves and Railheads Study was outdated, and thus a re-assessment of capacity was undertaken following engagement with operators.
 - That the existing operational capacity at wharves is 2.27mtpa
- That sales data from wharf operators at Shoreham was not accurate due to an element of double counting, and that the decision was made to use landings data (for marine dredged aggregates) to avoid double counting.
- That of the four options being considered, the Authorities would pursue Option W3, to safeguard a capacity of 2.20mtpa, but this would require agreement from ESCC/B&HCC to safeguard Britannia Wharf (in B&H)
 - This would result in a surplus capacity of 0.86mtpa being available.

General discussion about wharves and policy;

- TC raised the point that Littlehampton would not be able to provide for ES/B&H demand, which was accepted by WSCC officers although it was recognised that as this wharf is linked to a coated roadstone plant, these products are different from those supplied through Shoreham.
- TC/PR asked about Britannia wharf and how delivery and investment could be secured. It is important to understand how Common User Terminals and Britannia can be used to supply aggregates in future.
 - DH – we will be discussing this further with Shoreham Port Authority.
- DH stated that the "potential" capacity in the Eastern Harbour Arm could be safeguarded; in a similar way to the ES/B&H Plans seek to do through a red line boundary around the existing operational area which have potential to be used for minerals.
- PR asked if the draft policy could provide a more long term view. It seems practical
 - RS stated that the Vision and Objectives of the Plan will provide this longer term view.
- ST/PR stated that they are satisfied with the approach being taken.
- RS/DH stated that the aim was to update the Statement of Common Ground taking account of more recent information.
 - Aim to finalise and have sign up to an updated SoCG by end March 2016

Action: ST/PR to provide WSCC with dates for planning committee in order to sign of SoCG

Next Steps

It was agreed that WSCC would undertake the following work;

- Meet with SPA (18 January 2016) and discuss the following

- Common User Terminals
 - Potential of Britannia Wharf
 - The policy approach being taken
- Will update the SoCG and provide to ESCC/B&HCC for comment.

End

Appendix 1 – Note provided on Wharf safeguarding policy options prior to meeting

The West Sussex Joint Minerals Local Plan needs to ensure that capacity of aggregate wharves is safeguarded so that a steady and adequate supply of Marine Dredged Aggregate (MDA) and Crushed Rock (CR) can continue to be landed in future. In order to do this,

Demand

WSSC initially prepared a draft supply and demand report and presented this to key stakeholders for comment during early 2015. It was decided however, that the evidence within that report would be better placed in the West Sussex LAA.

The draft West Sussex LAA was presented to SEEAWP in November 2015, and it was agreed in writing by the secretary. Tony Cook (ESCC) also wrote to WSSC confirming satisfaction with the approach set out in the LAA.

The decision was made, following analysis of available data (The Crown Estate landings, Shoreham Port Authority (SPA) landings, and sales data) to use landings data as the baseline for calculating demand. There are a number of operators in Shoreham that are buying bulk MDA from other Shoreham operators, rather than landing it directly at wharves. This has resulted in double counting of sales.

The LAA presents the 10 year average rolling landings (MDA) and sales (CR), and also considers other relevant local information, as required by NPPF. This is a consideration of planned housing and planned highways expenditure. The other relevant local information has been used to calculate what WSSC believe future aggregate demand is likely to be;

- 10 year average sales/landings (2005-2014);
 - MDA – 919,354tpa
 - CR – 101,836tpa
 - Total – 1,021,190
- Maximum expected annual demand (taking account of other relevant local information);
 - MDA – 1,206,193tpa
 - CR – 134,135tpa
 - Total demand – 1,340,328tpa

West Sussex are intending to plan for the highest expected demand – **1,340,328tpa**

Capacity

The West Sussex Wharves and Railheads Study (2014) presented a number of scenarios which were based on capacities at wharves. The capacities were rolled forward from the previous, 2008, wharves and railheads study. The Authorities decided, following discussions with stakeholders, to undertake an assessment of capacity as the 2008 data had become outdated.

Following a number of discussions with operators and Shoreham Port Authority, the capacity of wharves in West Sussex was amended.

The operational capacity at the wharves was updated to 2,274,000tpa, from 1,885,000tpa as a result of this review.

Scenarios

The West Sussex Wharves and Railheads Study (2014) presented safeguarding options for consideration in the West Sussex JMLP. Due to the fact that further work was undertaken to calculate demand (as set out in the LAA), and a recalculation of capacity undertaken, there was a requirement to prepare a new set of policy options as those in the study were now outdated.

The following options, considered to be reasonable, were prepared and have been subject to SA;

- Option W1: Maintain current capacity by safeguarding all currently operational minerals wharves in West Sussex (2.27mtpa).
- Option W2: Safeguard wharves in Eastern Harbour Arm at Shoreham and at Littlehampton (ARC Wharf, Halls Wharf, Turberville & Penneys, Railway Wharf) (1.95mtpa capacity).
- Option W3: Safeguard wharves in Eastern Harbour Arm at Shoreham and at Littlehampton (ARC Wharf, Halls Wharf, Turberville & Penneys, Railway Wharf); and seek safeguarding of Britannia wharf (and extension) (2.20mtpa capacity).
- Option W4: Safeguard wharves in Eastern Harbour Arm at Shoreham and at Littlehampton (ARC Wharf, Halls Wharf, Turberville & Penneys, Railway Wharf); and seek safeguarding of Britannia wharf (and extension); and rely on 96ktpa general terminus capacity at Shoreham Eastern Harbour Arm (2.29mtpa capacity).

The above four options would all be capable of meeting future demand (1.34mtpa). Option W1 would safeguard wharves in the Western Harbour Arm of Shoreham, which forms part of the Shoreham JAAP regeneration aspirations.

Option W2 would provide sufficient capacity, however the Authorities are keen to ensure that Britannia wharf (and others in B&H) are safeguarded as the loss of wharves in the Western Harbour Arm would occur through regeneration.

The West Sussex JMLP safeguarding policy approach (set out in other note) will be W3. This will require an agreement, through an updated SoCG, that those wharves in the Eastern Harbour Arm of Shoreham which are within B&H would also be safeguarded. This would provide sufficient capacity to meet aggregate demand in East Sussex, Brighton and Hove, and West Sussex.

Rupy Sandhu
06/01/2016

**DtC31 – Statement of Common Ground between the Shoreham
Harbour Planning Authorities and the Shoreham Port Authority
(August 2016)**

Statement of Common Ground between the Shoreham Harbour Planning Authorities and the Shoreham Port Authority

August 2016

1. Introduction

1.1 The parties to this Statement of Common Ground are:

Adur District Council
Brighton & Hove City Council
East Sussex County Council
West Sussex County Council
South Downs National Park Authority
Shoreham Port Authority

1.2 The Parties are responsible for the development of Local Planning Documents as relevant to this Statement:

- Brighton & Hove City Plan – Brighton & Hove City Council
- East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan;
- East Sussex, South Downs, and Brighton & Hove Waste and Minerals Sites Plan.
- West Sussex and South Downs National Park Joint Minerals Local Plan;
- Adur Local Plan- Adur District Council
- Shoreham Harbour Joint Area Action Plan (JAAP) – produced jointly by the Shoreham Harbour Regeneration Partnership comprising Adur District Council, Brighton & Hove City Council, West Sussex County Council and Shoreham Port Authority.

1.3 Brighton & Hove City Council and West Sussex County Council are Mineral Planning Authorities, responsible for minerals planning in their parts of Shoreham Harbour, in line with the requirements of national planning policy. East Sussex County Council and the South Downs National Park Authority are neighbouring Mineral Planning Authorities, working in partnership with Brighton & Hove City Council on the preparation of mineral and waste planning policy documents which cover the part of Shoreham Harbour within Brighton & Hove. Shoreham Port Authority is responsible for the conservancy of the Port and is the main landowner. Adur District Council is the local planning authority for the area of Shoreham Harbour that is located within West Sussex, and is responsible (alongside West Sussex County Council) for local planning matters within the part of Shoreham Harbour within West Sussex .

- 1.4 Adur District Council, Brighton & Hove City Council, West Sussex County Council and Shoreham Port Authority are partners in the preparation of the Shoreham Harbour Joint Area Action Plan (JAAP). The vision contained in the draft JAAP for the next 15 years is to maximise the potential of Shoreham Harbour for the benefit of existing and new residents, businesses, port-users and visitors through a long term regeneration strategy. This will be achieved through working with local landowners and business to facilitate the redevelopment of key sites.
- 1.5 The aim of the JAAP is to deliver a series of appropriately located, high quality, sustainable, mixed-use developments including new housing, employment floorspace, leisure opportunities, improved public space and associated infrastructure including flood defences and transport improvements. The regeneration proposals will be facilitated by consolidating, reconfiguring and enhancing the operations of Shoreham Port.
- 1.6 A key issue for the Planning Authorities and Shoreham Port Authority is the presence of active and inactive mineral wharves and waste management facilities in the geographical area covered by the JAAP. Paragraph 143 of the National Planning Policy Framework requires local planning authorities to safeguard existing, planned and potential wharfage for bulk transport of minerals.
- 1.7 Policy WMP15 of the adopted East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan aims to safeguard existing, planned and potential railhead and minerals wharf facilities (including rail sidings), and their consequential capacity. In line with Policy WMP 15, in order for proposals for alternative uses at mineral wharves within Brighton & Hove to be acceptable, evidence would need to demonstrate that there would be no net-loss of capacity for handling minerals within the Port as a whole.
- 1.8 The West Sussex Minerals Local Plan (2003) safeguards the following wharves through Policy 40:
 1. Free Wharf;
 2. Kingston Wharf;
 3. Turberville and Penney's Wharf;
 4. Western part of Halls Wharf and
 5. Brighton Power Station 'A' Wharf and RMC Roadstone Wharf (now known as ARC Wharf and Rombus Wharf respectively).
- 1.9 Additionally, Policy 41 identifies a new wharf at Littlehampton.

1.10 It is envisaged that the regeneration project will bring forward proposals for alternative land uses on some of these sites alongside relocation of existing businesses, particularly away from the Western Harbour Waterfront area where mixed use development is proposed. Sufficient capacity to meet the current and future demand for transportation of minerals is to be provided at wharves elsewhere in the Port. This is dependent on a change to the West Sussex County Council policy on wharf safeguarding, which will be included in the new West Sussex Joint Minerals Local Plan and will be tested through an examination in public before it can be adopted in 2018.

2. Purpose

2.1 The purpose of this Statement of Common Ground is to underpin effective cooperation and collaboration between the parties listed above in addressing strategic cross-boundary issues as they relate to planning for minerals infrastructure and safeguarding in Shoreham Harbour.

2.2 It sets out matters of agreement and commitment to a future policy approach, reflecting the spirit of co-operation between the parties to the Statement. It is, however, not intended to be legally binding or to create legal rights.

2.3 The Statement sets out the current evidence available to the parties at the time of preparation, the evidence will continue to build upon this evidence through the development of emerging Local Plans.

3. Aims

3.1 The Statement has the following broad aims:

- to set out the commitment of each of the parties to an approach to mineral safeguarding in line with NPPF at Shoreham Harbour, recognising commercial considerations of the Port and the regeneration aspirations of the JAAP;
- to indicate the approach to be taken by all parties to delivering this commitment.
- to replace the Statement of Common Ground, signed by all above mentioned parties, in April 2014.

4. Limitations

4.1 The Parties to the Statement recognise that there will not always be full agreement with respect to all of the issues on which they have a duty to

cooperate. For the avoidance of doubt, this Statement shall not fetter the discretion of any of the Parties in relation to any of its statutory powers and duties, and is not intended to be legally binding.

4.2 The approach to mineral safeguarding will be tested upon submission to the Secretary of State through an examination in public on the West Sussex Joint Minerals Local Plan and through implementation of Policy WMP15 of the adopted East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan, and safeguarding policy in the draft East Sussex, South Downs and Brighton & Hove Waste and Minerals Sites Plan. The Shoreham Harbour JAAP will bring forward alternative land uses, facilitate regeneration and associated infrastructure.

5. Background

5.1 The current West Sussex Minerals Local Plan was adopted in 2003. Policies 36 to 41 have been saved, safeguarding existing and potential wharves and railheads within the County. West Sussex County Council, in partnership with the South Downs National Park Authority, has commenced preparation of a new Joint Minerals Local Plan, which will replace the currently adopted version. To provide evidence for a new policy on wharf safeguarding, the County Council and South Downs National Park Authority commissioned a West Sussex Wharves and Railheads Study (February 2014) which investigated a range of potential scenarios and assessed them in respect of historic demand.

5.2 It was proposed that Scenario W3 of the Wharves and Railheads Study taken forward as the preferred policy approach, as this would safeguard dedicated mineral wharf capacity to cater for future demand in line with sales over the previous 10 years. This was set out in the SoCG signed in April 2014.

5.3 Following signing of the SoCG (April 2014), a number of updates and further work was undertaken, which resulted in the outcomes and scenarios of the Wharves and Railheads Study no longer being considered suitable. This includes;

- An update on wharf capacity at Shoreham, resulting in existing and operational capacity being increased from 1.89mtpa to 2.27mtpa. Discussions were undertaken with operators and SPA to ascertain that the data used in the Wharves and Railheads Study, dating back to 2008, was outdated;
- A change of approach in calculating aggregates demand, taking account of landings data (provided by The Crown Estate and SPA) for marine dredged aggregates, rather than sales data. The sales data does not provide a good baseline for calculating demand as a number of operators in Shoreham purchase aggregates from one another. This results in double

counting of aggregates which inflates the estimate of demand for wharf capacity. Landings data provides a better indication of historic demand for wharf capacity;

- Updated calculations of demand for aggregates, taking account of planned housing and highways development in neighbouring authorities (*other relevant local information*); and
- An updated Local Aggregates Assessment (LAA), which was subject to South East England Aggregate Working Party consideration in November 2015. The updated LAA (April 2016) sets out the anticipated demand through the Plan period for the Joint Minerals Local Plan.

5.4 The key headlines from the updated LAA (April 2016) are as follows;

- The ten-year average sales/landings of marine dredged aggregates and crushed rock at West Sussex wharves totals 1,021,190 tonnes per annum (2005-2014);
- The maximum expected demand, taking account of *other relevant local information* is 1,349,328 tonnes per annum to 2033; and
- The estimated operational capacity in West Sussex totals 2,274,000tonnes per annum.

5.5 Preparation of the Joint Minerals Local Plan has included the consideration of reasonable policy options for safeguarding wharves. These entirely replace the scenario options set out within the West Sussex Wharves and Railheads Study and are all capable of meeting anticipated future demand. Option W1 would not enable delivery of the emerging regeneration aspirations contained within the Shoreham JAAP.

5.6 The options considered for the JMLP are set out below;

- **Option W1:** Maintain current capacity by safeguarding all currently operational minerals wharves in West Sussex (2.27mtpa)
- **Option W2:** Safeguard wharves in the Eastern Harbour Arm at Shoreham and at Littlehampton (ARC Wharf, Halls Wharf, Turberville and Penneys Wharf, Railway Wharf) (1.95mtpa)
- **Option W3:** Safeguard wharves in the Eastern Harbour Arm at Shoreham and at Littlehampton (ARC Wharf, Halls Wharf, Turberville and Penneys Wharf, Railway Wharf) and seek safeguarding of Britannia Wharf in Brighton & Hove (2.20mtpa)
- **Option W4:** Safeguard wharves in the Eastern Harbour Arm at Shoreham and at Littlehampton (ARC Wharf, Halls Wharf, Turberville and Penneys Wharf, Railway Wharf) and seek safeguarding of potential wharves in Eastern Harbour Arm (Britannia Wharf and Rombus Wharf) in West Sussex and Brighton & Hove (2.49mtpa)

Brighton & Hove City Council has prepared a Waste and Minerals Plan (2013) in partnership with East Sussex County Council and the South Downs National Park Authority. Policy WMP15 aims to safeguard existing, planned and potential railhead and minerals wharf facilities (including rail sidings), and their consequential capacity. In line with Policy WMP15 of the adopted East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan, in order for proposals for alternative uses at mineral wharves within Brighton & Hove to be acceptable, evidence would need to demonstrate that there would be no net-loss of capacity for handling minerals within the Port as a whole. The draft East Sussex, South Downs and Brighton and Hove Waste and Minerals Sites Plan provides a safeguarding policy area related to Policy WMP15 within which facilities to land, process and handle, and associated storage of minerals and their consequential capacity would be safeguarded. This could include use of flexible arrangements such as wharves within the safeguarding area which cater for a range of materials, including minerals, to compensate for the loss of capacity at a specific mineral wharf.

- 5.7 The Shoreham Harbour Interim Planning Guidance (August, 2011) was prepared by the Shoreham Harbour Regeneration Partnership. The Interim Planning Guidance states that a key factor in considering new development and changes of use in the Harbour area which will be taken into account is the impact of development on safeguarded wharves and existing waste facilities, and the extent to which the development contributes to meeting future needs for minerals imports and waste management.
- 5.8 The Shoreham Harbour Regeneration Partnership has prepared two Development Briefs for the proposed areas of change in Shoreham Harbour. The Western Harbour Arm Development Brief was adopted by Adur District Council in July 2013. The South Portslade Industrial Estate and Aldrington Basin Development Brief was adopted by Brighton & Hove City Council in September 2013. The brief states that Ferry Wharf (a wharf in Brighton & Hove), could be developed to provide modern employment floor space, subject to suitable mineral wharf capacity identified at the Port to replace Ferry wharf.
- 5.9 The Western Harbour Arm Development Brief states, in paragraph 5.2.5, for example, that: Adur District Council, Shoreham Port Authority, Brighton & Hove City Council, West Sussex County Council and East Sussex County Council are committed to working together to ensure that an appropriate policy approach is incorporated within the updated West Sussex Joint Minerals Local Plan and the JAAP; and that in the short term any applications for alternative development proposals on safeguarded mineral wharves or adjacent sites will need to clearly demonstrate that there will be no net-loss to capacity for the import of aggregates at the Port as a result of any proposals.

6. Agreements between the Parties

- 6.1 The Parties recognise the importance of mineral wharf capacity at Shoreham Port and support the safeguarding of both specific sites and more general capacity for landing of minerals at the Port.
- 6.2 The parties recognise the importance of aggregate wharves at Shoreham to the supply of minerals to West Sussex, East Sussex, Brighton & Hove and other areas in the South-East. In particular, there is likely to be an increased reliance on minerals (both land won and marine dredged) landed at Shoreham from East Sussex and Brighton & Hove, resulting from both the potential reduced availability of land won sources within, and imports to, East Sussex, and the demand arising from planned development.
- 6.3 The parties recognise the role of Shoreham Port Authority in assisting with both the short and long term demand for mineral landings at potential wharves within the Port Operational Area.
- 6.4 The parties recognise the regeneration aspirations for the Harbour, to be delivered through the JAAP, which will broadly result in the redevelopment of the Western Harbour Waterfront for mixed-uses and the concentration of port activities on the Eastern Harbour Arm.
- 6.5 The parties recognise the conclusions of the West Sussex Local Aggregates Assessment (April 2016)

In examining the conclusions of the LAA and consideration of policy options, the parties recognise that Option's W2-W4 would all provide sufficient capacity to meet future demand for continued supply of aggregates through existing and potential wharves located within Shoreham Harbour. Options W2 and W3 would reduce the total capacity to land minerals, and therefore Option W4 is the preferred approach and has been included in the Draft Joint Minerals Local Plan (April 2016)

- 6.6 The Shoreham Port Masterplan includes a commitment to improvements to Port facilities, including the expansion of wharves through infilling activity, which would result in an increase in land, therefore an increase in throughput capacity. Infilling work is being considered at Turberville and Penneys Wharf and Britannia Wharf.

Actions and Activities

6.7 In order to facilitate the JAAP process:

- West Sussex County Council and the South Downs National Park Authority have included Option W4, as Policy M10, in the Draft Joint Minerals Local Plan (April 2016). This will include both the safeguarding of specific sites, and also recognition of the importance of wharves on the Eastern Harbour Arm with potential to be used for minerals which could contribute to the capacity for handling minerals within the Port as a whole.
- In line with Policy WMP15 of the adopted East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan, in order for proposals for alternative uses for wharves within Brighton & Hove to be acceptable, evidence would need to demonstrate that there would be no net loss of capacity for handling minerals within the Port as a whole. This could include the use of flexible arrangements, such as wharves which cater for a range of materials (common user terminals), including minerals, to compensate for the loss of capacity at a specific mineral wharf.

6.8 Shoreham Port Authority will use its best endeavours to facilitate the delivery of port improvement works which would increase the capacity of existing minerals wharves in the Eastern Harbour Arm as identified in the Port Masterplan (subject to securing the relevant permissions and commercial considerations);

6.9 In order to facilitate the development management process, particularly for Adur District Council, West Sussex County Council will seek to engage with the development management process in their role as the Mineral Planning Authority. Where applications seek redevelopment of sites on the Port, the County Council will base their response on the safeguarding approach as set out within the draft Joint Minerals Local Plan.

6.10 This approach is likely to result in redevelopment of two wharves that are currently safeguarded through the West Sussex Minerals Local Plan (2003) as opportunities arise. These wharves are Free Wharf and Kingston Railway Wharf.

6.11 These sites would not cease to be safeguarded until the adoption of the new West Sussex Minerals Local Plan, however once published, applications will be considered against policies in the Submission Draft JMLP. Those seeking to re-develop existing safeguarded wharves will be expected to provide evidence that there is sufficient capacity elsewhere to accommodate any loss of capacity on the site in question.

6.12 The Mineral Planning Authorities party to this Statement will continue to collaborate on these matters and evidence the approach set out within this through the preparation of Local Aggregate Assessments. The Mineral Planning Authorities will continue to liaise with other Mineral Planning Authorities in the South East in relation to the general matters set out in the Statement, in particular, the challenges associated with supply of aggregates from land won sources.

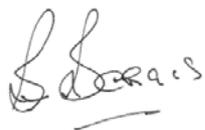
7. Timescale

7.1 The Statement of Common Ground is intended to run from June 2016 until it is replaced by an updated Statement or until the adoption of the relevant Local Planning Documents being prepared by the Parties, particularly the West Sussex Joint Minerals Local Plan.

8. General

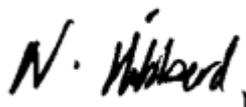
8.1 The terms of this Statement may be amended at any time by agreement in writing between the Parties.

9. Signatures



CLlr Brian Boggis
Executive Member for Regeneration

Adur District Council



Nick Hibberd
Acting Executive Director Economy,
Environment & Culture

Brighton & Hove City Council



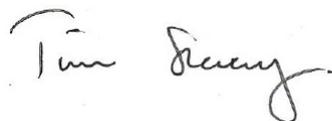
Rupert Clubb,
Director of Communities, Economy
& Transport

East Sussex County Council



CLlr John O'Brien
Cabinet Member for Highways and
Transport

West Sussex County Council



Tim Slaney
Director of Planning
**South Downs National Park
Authority**



Peter Davies
Development Director
Shoreham Port Authority

**DtC32 – Correspondence with Adur District Council
(October 2016)**

From: Chris Jones [<mailto:chris.jones@adur-worthing.gov.uk>]
Sent: 25 October 2016 08:27
To: Darryl Hemmings
Cc: Rupy Sandhu; Caroline West; James Appleton; Ian Blake
Subject: Re: West Sussex Joint Minerals Local Plan - Policy M10 (Safeguarding Minerals Infra) - proposed ammendments

Darryl

The revised policy goes some way to addressing the concerns that James and I raised.

We welcome the addition of clause (d) which will allow for thr redevelopment of sites as part of the regeneration of Shoreham Harbour.

We would suggest that clause (e) is amended to clearly state that these wharves are safeguarded only for the period in which permission is in place, and the wharf is in use.

Kind regards,

Chris

On 13 October 2016 at 12:02, Darryl Hemmings <darryl.hemmings@westsussex.gov.uk> wrote:

Hi Chris,

Further to your comments below, we have proposed amendments to Policy M10 (safeguarding minerals infrastructure).

As you recognise, there is a need for the JMLP to be sound and compliant with national policy. This draft policy is intended to strike the right balance between the need to safeguard the operation of mineral infrastructure and redevelopment of the Western Harbour Arm as set out in the emerging JAAP through a separate clause and criteria which would apply to wharves with temporary permission.

Could you please consider the draft policy and lets us know if you have any comments or concerns by Friday 21 October at the very latest (earlier if possible) as the Proposed Submission Draft Plan is now in the final stages of preparation. If a meeting next week would help to discuss any concerns you may have, then please let us know and we will do our best to facilitate this.

Kind regards,

Darryl

[Darryl Hemmings](#) | Planning & Transport Policy Manager, Residents' Services, [West Sussex County Council](#)
Location: Ground Floor, Northleigh, County Hall, Chichester, PO19 1RH
Internal: 26437 | External: [+44 \(0\)330 222 6437](tel:+4413302226437) | E-mail: darryl.hemmings@westsussex.gov.uk

From: Chris Jones [mailto:chris.jones@adur-worthing.gov.uk]
Sent: 26 September 2016 09:51
To: Rupy Sandhu
Cc: Caroline West; Darryl Hemmings; James Appleton
Subject: Re: West Sussex Joint Minerals Local Plan - Policy M10 (Safeguarding Minerals Infra) - proposed amendments

Dear Rupy,

Following discussion with James, please see our response regarding proposed changes to Policy M10:

We have strong reservations about the proposed changes to Policy M10 in the emerging West Sussex Minerals Plan. The approach recently agreed by all partners in the Statement of Common Ground (2016) would not seek to safeguard any of the sites on the Western Harbour Arm.

The proposed amendment would safeguard Kingston Railway Wharf and New Wharf. These sites are currently in active, but temporary, mineral-related use. However, we are not convinced that safeguarding is appropriate, and could create a number of significant problems for the regeneration project and the emerging Joint Area Action Plan.

New Wharf has a temporary permission for minerals use until March 2018. This was granted at appeal. The Inspector noted that a longer permission would have an adverse impact on the regeneration proposals for the Harbour due to the likely proximity housing development on adjoining land. The adjacent Free Wharf site has been purchased by a housing developer, and the Council is currently in pre-application discussions with the developer, and is expecting an application before the end of the year. Given the comments of the Inspector (granting a shorter temporary permission than had been applied for by the Minerals operator) the proposals for this site are based on the assumption that the minerals use will cease in 2018, allowing occupation by residents after this date.

There is potential that the proposed redevelopment of Free Wharf would not meet the requirements set out in part (a) of Policy M10, in that redevelopment would have wider social and/or economic benefits **and** a suitable replacement site has been identified. This would place an unfair burden on the developer of Free Wharf and/or the planning authorities to identify a suitable site for the operator of New Wharf to relocate to.

Kingston Railway Wharf has a temporary permission for minerals use until September 2016, and the operator has applied to extend this to 2018 (decision pending). The wharf forms part of a larger site that has recently been marketed to potential developers by the landowner (Shoreham Port Authority). This is on the assumption that minerals use will cease in 2018 and the site will then be available for redevelopment.

As above there is the potential that the propose redevelopment for non-minerals uses would not meet the requirements of part (a) of Policy M10.

The amended policy M10 lists New Wharf and Free Wharf along with all the other safeguarded wharves. The policy does not state that for these two wharves safeguarding would be for a temporary period. However, the background text does state that this is for the duration of the permission. This being the case, we do not see the need for additional safeguarding through the policy.

Whilst we recognise the need for the Minerals Plan to be sound and compliant with national policy, we are not convinced of the need to apply safeguarding to these two sites. We would appreciate the opportunity to discuss this further in person if this would assist your consideration of our concerns.

Kind regards,

Chris

On 20 September 2016 at 15:59, Rupy Sandhu <rupy.sandhu@westsussex.gov.uk> wrote:

Dear Chris,

As you will be aware, during the Reg.18 consultation on the draft Joint Minerals Local Plan (JMLP), comments were received stating that minerals wharves located on the Western Harbour Arm of Shoreham (within the JAAP regeneration area), should continue to be safeguarded until redevelopment. Darryl informed you, at the JAAP Project board, that we would share some draft amends with you for your views. The attached document contains the proposed changes to the chapter on safeguarding infrastructure.

We have now included both Kingston Railway Wharf and New Wharf within Policy M10 of the Plan, and made a number of changes to the supporting text accordingly. We feel the amendments correctly reflect national policy, and are clear in that the sites would only be safeguarded whilst permitted (both have temporary permissions), and that they can be redeveloped for regeneration when the time comes.

Your views on the amendments as soon as possible would be greatly appreciated. We are sending the draft Plan for SA on Monday 26 (to consultants), so any comments which we could feed in prior to that would be helpful. Please note, we are a long way from Reg.19 (due early next year).

Kind regards,

Rupy

[Rupy Sandhu](#) | Senior Planner - Minerals and Waste Policy, Residents' Services Directorate, [West Sussex County Council](#)

Location: Ground Floor, Northleigh, County Hall, Chichester, PO19 1RH

Internal: 26454 | External: [+44 \(0\)330 2226454](tel:+44(0)3302226454) | E-mail: rupy.sandhu@westsussex.gov.uk

DtC33 – Correspondence with Arun District Council (March, 2016)

From: Nicki Faulkner [<mailto:Nicki.Faulkner@arun.gov.uk>]
Sent: 16 March 2016 16:37
To: Caroline West; Rupy Sandhu
Cc: Donna Moles; Neil Crowther; Philip James
Subject: RE: Minerals Safeguarding Policy and Proposed Annex - gentle reminder for comments

Caroline,

Having reviewed the draft minerals safeguarding policy and proposed annex, I have two key points regarding emerging policy M10 as set out below:

- 1. Supporting Evidence:** Paragraph 1.2.4 states “there are a number of important wharves located in Shoreham and Littlehampton for the importation of marine dredged aggregate, and crushed rock...”. However, in previous papers, particularly section 4 of Background Paper 4: Safeguarding Minerals Infrastructure (June 2014) it states that “The preferred scenario is W3. This would safeguard three key wharves (Tuberville and Penney’s Wharf; Arc Wharf; and Halls Wharf)”. It is not clear why Railway Wharf at Littlehampton is now considered to be as important as those identified in scenario W3, particularly considering the declining use of Railway Wharf for importation of minerals by sea.
- 2. Littlehampton Harbour Regeneration:** Officers wish to raise and highlight the fact that Railway Wharf is located within Littlehampton Harbour, part of the Littlehampton Economic Growth Area (LEGA) identified in the Arun Local Plan 2011-2031 Publication Version (Policy HSP1). The location has been identified through the emerging Local Plan as an opportunity area for regeneration of the Harbour and Town Centre.

Technical work is currently being undertaken to assess LEGA for its potential to accommodate up to 1,000 homes and to address issues such as flood risk. Further discussions regarding the regeneration potential of Littlehampton Harbour and the impacts of the proposed safeguarding status of the wharf will be important as findings from the technical work emerge in April/May. Discussions will be important to ensure that the emerging MLP policy does not preclude the regeneration of Littlehampton Harbour, taking into account available evidence.

I hope that this is of assistance. I have asked my colleague Carolyn to set up a meeting to discuss this, in response to Rupy’s email to Karl on 11th March.

Kind regards,
Nicki

[Nicki](#) Faulkner MA MRTPI | Principal Planning Officer (Policy and Conservation), Strategic and Environmental Services,
[Arun District Council](#) | Location: 1st Floor, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF
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