

STATEMENT BY SOMERSET COUNTY COUNCIL

September 2014




MATTER 5: CRUSHED ROCK

Background Documents referred to within Statement

- Somerset Minerals Plan (Doc Ref SD1)
- National and Regional Guidelines for Aggregates Provision in England 2005 – 2020 (Doc Ref NE14).
- NPPF (Doc Ref NE3)
- Somerset Local Aggregate Assessment 2014 (Somerset LAA 2014) (Doc Ref SD23b).
- Schedule of Proposed Changes (Doc Ref SD6b)
- Mineral resource information in support of national, regional and local planning: Somerset (Doc Ref TD39)
- Somerset Minerals Local Plan (adopted 2004) (Doc Ref SD19a)
- Representations Received (Doc Ref SD7)

Document Control Sheet

	<u>Position</u>	<u>Name</u>	<u>Date</u>
Prepared by:	Senior Planning Policy Officer	Guy Robinson	17/07/2014
Reviewed by:	External / critical friend		30/07/2014
Revised version prepared by:	Senior Planning Policy Officer	Guy Robinson	27/08/2014
Approved by:	Service Manager: Planning Policy		04/09/2014

For the forthcoming Hearing, the Inspector has requested that Somerset County Council briefly summarise their position on each discussion topic. The following is a brief summary of Somerset County Council's response to Matter 5: Crushed rock, examining the **Issue: Whether sufficient opportunities are provided for the steady and adequate supply of crushed rock.**

1. Plan paragraph 6.23 (second bullet) refers to Somerset, Devon and Cornwall having (in the present tense) a joint apportionment. Given the demise of Regional Government and the publication of the Framework and PPG, should provision be based on apportionment?

SCC Response

- 1.1. It is important to note that Somerset County Council's approach to the provision of crushed rock in the Somerset Minerals Plan is not based on apportionment (also see the County Council's response to question 2 below).
- 1.2. However, with regard to Somerset County Council's use of the present tense in paragraph 6.23, the apportionment and sub-regional apportionment figures have not been revoked or similar; hence they remain part of the context set for the current position in Somerset.
- 1.3. The response from Somerset County Council to matter 6 covers the County Council's approach to the adequate and steady supply of sand and gravel.
- 1.4. The bullet points in paragraph 6.23 of the **Somerset Minerals Plan (Doc Ref SD1)** summarises historical recommendations of the South West Aggregates Working Party (SW AWP) for sub-regional apportionment based on apportionment in the **National and Regional Guidelines for Aggregates Provision in England 2005 – 2020 (Doc Ref NE14)**.

**Somerset Minerals Plan Examination
Hearing Sessions: September 2014
Statement by Somerset County Council**

2. How does apportionment fit with the Framework's requirement to plan for the supply of aggregates based on, amongst other things, 10 years sales data (paragraph 145 second bullet)?

SCC Response

2.1. Somerset County Council's approach to the provision of crushed rock is based on the average of 10 years sales data, as indicated by the **NPPF (Doc Ref NE3)** and covered in more detail in the **Somerset Local Aggregate Assessment 2014 (Somerset LAA 2014) (Doc Ref SD23b)**.

3. Plan paragraph 6.29 states an average 10 year sales figure of 10.81 million tonnes (based on 2011 data). Is there an updated figure and, if so, what is it?

SCC Response

3.1. The updated figure is 10.45 million tonnes, which is based on the period 2004-2013. The detailed underlying this calculation is shown in the Somerset LAA 2014 (Doc Ref SD23b).

4. Plan paragraph 6.35 refers to a crushed rock landbank of 451 million tonnes (2012 figure). Does this 2012 figure use the 2011 sales figure? If not, how is it calculated? Should it be updated?

SCC Response

4.1. This figure on Somerset's landbank has indeed been updated. The most recent calculation of Somerset's landbank is 425 million tonnes (as at 31 December 2013), which was informed by the annual SW AWP survey, carried out in early 2014. This updated figure for Somerset's landbank is stated in the recently approved Somerset LAA 2014 (Doc Ref SD23b).

5. If the 2011 data is updated, what is the current best estimate of the landbank tonnage and what would this equate to in years' supply?

SCC Response

5.1. As stated in the Somerset LAA 2014 (Doc Ref SD23b) the latest estimate of the landbank for crushed rock is 425 million tonnes (as at 31 December 2013). This equates to over 40 years' worth of supply.

6. Besides sales figures, is there any other local information which impacts on demand?

SCC Response

- 6.1. The Somerset LAA 2014 (Doc Ref SD23b) considers the issue of any other local information which impacts on demand. More specifically, page 25 of the LAA (Doc Ref SD23b) covers the potential demand from major infrastructure.
- 6.2. The Somerset LAA 2014 (Doc Ref SD23b) highlights the biggest development project that may impact on demand as the Hinkley Point C (HPC) nuclear power station and associated development.
- 6.3. Even though it is a large-scale project, the potential demand from the HPC nuclear power station and associated development remains relatively small when compared with the size of the county's landbank.
- 6.4. Looking at Hinkley Point C in a little more detail, the Freight Management Strategy in EDF Energy's Transport Assessment states estimates that 7.1 million tonnes of material will be transported to/from the Hinkley Point C project sites during the construction phase. This total includes construction materials, waste and materials generated by the removal of some of the associated development facilities at the end of the HPC construction phase.
- 6.5. Set in this context, assuming 5 million tonnes of crushed rock is needed for HPC and associated developments, and all of this is supplied from Somerset, this would represent approximately 1% of the county's current landbank. It is acknowledged that this demand will be in peaks rather than at a constant low level throughout the HPC project; however, procurement of supplies and services is market-led.
- 6.6. A draft Somerset LAA 2014 was been considered by the SW AWP and other stakeholders and Somerset County Council has responded to the comments received. No comments were made on the draft LAA 2014 with regard to the issue of "other relevant local information".

7. Can the 10 year sales figure be broken down into limestone sales and igneous rock sales? If so, what are the relevant figures?

SCC Response

- 7.1. There is only one supplier of Silurian Andesite (igneous rock) in Somerset – namely John Wainwright & Co Ltd working the Moons Hill quarry complex. As a result, there are confidentiality concerns in publishing the yearly sales for Silurian Andesite.
- 7.2. Nonetheless, John Wainwright & Co Ltd has committed to share a rolling average of 10 years sales with Somerset County Council and for that figure to be in the public domain. The most recent average of 10 year sales of Silurian Andesite is 375,000 tonnes.

- 7.3. The figure of 10.45 million tonnes as stated in the Somerset LAA 2014 (Doc Ref SD23b) and the **Schedule of Proposed Changes (Doc Ref SD6b)** is the average of 10 years sales of crushed rock (Limestone and Silurian Andesite combined). Whilst subtracting the average of 10 year sales of Andesite from this overall total gives the scale of Limestone sales (exceeding 10 million tonnes on average), Carboniferous Limestone sales have not been reported separately during crushed rock data collection via the SW AWP.
- 7.4. Future monitoring of the two landbanks will be informed by further discussions with the SW AWP and the results embedded within the Somerset LAA.

8. What are the forecasts for demand of each?

SCC Response

- 8.1. The forecast for provision of crushed rock is informed by the average of the past 10 year sales (10.45 million tonnes). This will be updated annually via the Somerset LAA. This figure combines Carboniferous Limestone and Silurian Andesite. The Somerset LAA is reviewed by a range of stakeholders including but not limited to the SW AWP.
- 8.2. Focusing on Silurian Andesite alone, the demand for Andesite is similarly informed by the average of the past 10 year sales (375,000 tonnes). Again, this will be updated annually via the Somerset LAA, and informed by dialogue with industry (in particular John Wainwright & Co Ltd.).
- 8.3. Both figures can be used to project future demand, with scope for tailoring forecasts in response to the past three year sales and/or other relevant information as appropriate, in discussion with the SW AWP.

9. Should separate landbanks be maintained for limestone crushed rock and igneous crushed rock (high quality polished stone value)? (See PPG ID 27-066-20140306)

SCC Response

- 8.4. Historically it has been considered that separate landbanks for these two material types would not be deliverable, due to conventional confidentiality concerns associated with maintaining a landbank to which only a limited number of quarries can contribute.
- 8.5. Also it is not straight forward to identify an accurate estimate for permitted reserve for Silurian Andesite given the complexity of the local geology.
- 8.6. Historically, too, it has been acknowledged that there is a large landbank of permitted reserves at Moons Hill (the active site for Andesite extraction). As a result there were no pressures linked with a potential shortfall in supply.

- 8.7. A revised context for this issue is set by the inclusion of more explicit language in the Planning Practice Guidance on maintaining a separate landbank for high specification stone, and the reference to high quality polished stone value (high PSV) stone with regard to LAAs.
- 8.8. Following publication of the PPG, Somerset County Council has also had further discussions with the SW AWP on this matter and the operator of Moons Hill Quarry (namely John Wainwright & Co. Ltd).
- 8.9. Recent dialogue with John Wainwright & Co Ltd has taken place at a time when John Wainwright & Co Ltd has been reviewing its position and its latest estimates of permitted reserves.
- 8.10. As a result of this discussion, Somerset County Council and John Wainwright & Co Ltd have reached an agreement whereby the County Council will maintain a separate landbank for Silurian Andesite, and relevant changes to the Minerals Plan are proposed in document SD6b (in particular see Change Nos. 17-20).
- 8.11. Going forward, this arrangement will be informed by and reliant upon data supplied by John Wainwright & Co Ltd for inclusion in the Somerset LAA.

10. Overall, for Somerset crushed rock, is a 15 year landbank the most appropriate to maintain?

SCC Response

- 10.1. It is recognised that Somerset is a nationally significant supplier of crushed rock. For example, the British Geological Survey (BGS) report entitled **Mineral resource information in support of national, regional and local planning: Somerset (Doc Ref TD39)** states that “Somerset is a nationally important source of crushed rock aggregates, predominantly from the Lower Carboniferous limestones of the Mendip Hills”.
- 10.2. A 15 year landbank was maintained in the **Somerset Minerals Local Plan (adopted 2004) (Doc Ref SD19a)** and thus the approach proposed is a continuation of existing policy.
- 10.3. In responses to consultation, a range of stakeholders have acknowledged the significance of Somerset’s crushed rock resource and supported the active stance taken by Somerset County Council to go beyond the minimum.
- 10.4. Most recently during the pre-submission consultation – see the **Representations Received (Doc Ref SD7)** – industry (R43, R44, R106, R108) and neighbouring Mineral Planning Authorities (R102 and R340) support the proposed approach, noting Somerset’s position as a leading national supplier of aggregates.

11. If different landbanks were maintained for limestone and igneous rock, what time span should each landbank cover?

SCC Response

- 11.1. Somerset County Council proposes to adopt the same approach/duration for both types of landbank, acknowledging that in both cases the county's significance as a supplier extends beyond the county boundary.

12. Should Preferred Areas and/or Areas of Search be identified for crushed rock overall, and/or for limestone and/or igneous rock? Please give reasons.

SCC Response

- 12.1. It is not considered that Preferred Areas and/or Areas of Search are required, given the nature of existing crushed rock planning permissions and active sites in Somerset.
- 12.2. The overall landbank for crushed rock is 425 million tonnes; hence any shortfall in supply of crushed rock during the plan period is extremely unlikely.
- 12.3. Focusing on Silurian Andesite, the same logic applies, noting that the current landbank for Silurian Andesite is estimated to last approximately 22 years. Therefore it is not anticipated that a Preferred Area or AoS is needed.

END