

STATEMENT BY SOMERSET COUNTY COUNCIL

September 2014




MATTER 6: SAND AND GRAVEL

Background Documents referred to within Statement

- NPPF (Doc Ref NE3)
- Memorandum of Understanding (Doc Ref SD13c)
- Mineral Resource Information in Support of National, Regional and Local Planning: Somerset (comprising Somerset, North Somerset, the City of Bristol, and part of Exmoor National Park) (Doc Ref TD39)
- 2nd Devon Local Aggregate Assessment 2003-2012 (March 2014) (Doc Ref TD40b)
- Dorset Local Aggregate Assessment (Doc Ref TD40c)
- Schedule of Proposed Changes, v2 (Doc Ref SD6c)
- Planning statement Whiteball application (Doc Ref TD64a)
- Plan 1 referenced in Hanson planning statement (Doc Ref TD64b)
- Map showing Hanson application in context of Preferred Area (Doc Ref TD64c)
- Minerals Local Plan (adopted 2004) (Doc Ref SD19a)
- Aggregate Industries supporting statement Chard Junction (Doc Ref TD65)
- Assessment of Sand & Gravel, Crushed Rock and Secondary Aggregate Resources in the County of Devon (Doc Ref TD69)
- The Crown Estate Marine Aggregates 15th report (Doc Ref TD70)
- The Crown Estate Marine Aggregate Statistics 2013 (Doc Ref TD71)
- Whiteball Summary (Doc Ref TD72)
- SCC statement to Dorset Minerals Strategy examination (Doc Ref TD67)
- Bournemouth, Dorset and Poole Minerals Strategy Part A (Doc Ref RL27a)

Document Control Sheet

	<u>Position</u>	<u>Name</u>	<u>Date</u>
Prepared by:	Senior Planning Policy Officer	Guy Robinson	16/07/2014
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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 6: Sand and Gravel, examining the **Issue: whether sufficient opportunities are provided for the steady and adequate supply of sand and gravel.**

Question 1

The Somerset 2013 Local Aggregate Assessment (LAA) says that Somerset's sand and gravel apportionment is shared with Devon and Cornwall. Despite the apportionment provisions within the National and regional guidelines for aggregates provision in England 2005 to 2020, what weight should now be given to apportionment given the demise of Regional Government and the publication of the Framework and the recent PPG?

SCC Response

- 1.1. In practice, apportionment figures have less weight than they did do before the changes summarised in Question 1. Nonetheless, they still provide context as recognised in the **NPPF (Doc Ref NE3)** and the PPG.
- 1.2. The NPPF states in the fourth bullet point of paragraph 145 that Mineral Planning Authorities should plan for a steady and adequate supply of aggregates by... *taking account of published National and Sub National Guidelines on future provision which should be used as a guideline when planning for the future demand for and supply of aggregates.*

- 1.3. In answer to the question “*Can Mineral Planning Authorities simply use figures apportioned from the sub-national guidelines by the Aggregate Working Party as a substitute for Local Aggregate Assessments?*” the PPG states that *Individual mineral planning authorities must prepare Local Aggregate Assessments (either on their own or jointly with other mineral planning authorities), although in those areas where apportionment of the land-won element has already taken place, those figures may be used as an indicator as to how much should be planned for.* The PPG also states that the National and Sub National Guidelines are one potential source of information to assist in the preparation of Local Aggregate Assessments.
- 1.4. It is noted that in the Somerset Minerals Plan and the Somerset Local Aggregate Assessment (LAA) the apportionment figures for sand and gravel are introduced in their historical context. Nonetheless the figures remain extant i.e. they are still the current figures for sub-regional apportionment.
- 1.5. In practice apportionment sets the backdrop to the current position in Somerset, where co-operation is particularly important for the provision of sand and gravel.
- 1.6. Somerset County Council is committed to working with its neighbouring Mineral Planning Authorities, the minerals industry and other stakeholders as appropriate, in the context of evolving national policy and guidance.
- 1.7. It is noted that the South West Aggregates Working Party (SW AWP) has reviewed and accepted the Somerset LAA in 2013 and 2014.
- 1.8. Other Mineral Planning Authorities, such as Devon County Council and Dorset County Council, acknowledge the sub-regional apportionment in their respective LAAs whilst basing their approach to provision on the average of ten years sales (in Devon County Council’s this is a weighted figure).

Question 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 has taken a pro-active approach to engage with neighbouring Mineral Planning Authorities, in particular those which have historically supplied and continue to supply sand and gravel, and this is reflected in the joint **Memorandum of Understanding (Doc Ref SD13c)**.
- 2.2. This pro-active approach acknowledges that Somerset is not in a position to set a level of provision based on 10 years sales data, as stated in the Somerset Minerals Plan (paragraph 6.76 and 6.77) due to a lack of extraction of sand and gravel in Somerset. Without extraction activity it is impossible to operate the more usual assessment based on the rolling average of 10 years sales.

- 2.3. Extraction of sand and gravel in Somerset has been limited, and a report by British Geological Survey (BGS) on **Mineral Resource Information in Support of National, Regional and Local Planning: Somerset (comprising Somerset, North Somerset, the City of Bristol, and part of Exmoor National Park) (Doc Ref TD39)** states: “Resources are limited and there is virtually no land-won production of sand and gravel and no reported permitted reserves”.
- 2.4. It is noted that no alternative locations for sand and gravel extraction have been presented to the County Council as part of the plan-making process.

Question 3

Somerset’s provision in the Somerset 2013 LAA seems to rely on Devon having a 15 year sand and gravel landbank based on 10 years sales data (Devon LAA 2013). Whilst the Memorandum of Understanding is noted, should Somerset’s provision be incorporated with Devon’s provision in the absence of a joint LAA with Devon?

SCC Response

- 3.1. The current position is summarised in the Memorandum of Understanding (MoU) (Doc Ref SD13c) as noted.
- 3.2. In paragraph 3.1 of this MoU it is stated that the County Council intends to maintain provision for future working of sand and gravel from within Somerset to supply the Whiteball operation following the anticipated cessation of the Town Farm site in Devon in the early 2020s, thus providing reassurance to support continued investment in the Whiteball operations.
- 3.3. It is noted that the Whiteball processing operations can be supplied from more than one site in the local area i.e. on either side of the county border.
- 3.4. Furthermore, paragraph 3.1 of the MoU states that the County Council will seek to maintain the Preferred Area and Area of Search as identified “*To maintain sub-regional supply (contributing to Devon’s existing landbank for sand and gravel and maintaining production at Whiteball)*”.
- 3.5. The **2nd Devon Local Aggregate Assessment 2003-2012 (March 2014) (Doc Ref TD40b)** notes that the quantity of permitted reserves of land-won sand and gravel at the end of 2012 provides a landbank of 14.5 years, clearly in excess of the seven year minimum required by national policy. This provides a broad timeline in which further discussions about extraction from the Budleigh Salterton Pebble Beds (BSPB) may take place e.g. with Devon County Council, the operator at Whiteball and the SW AWP.
- 3.6. Within this dialogue it is anticipated that discussions will consider the merits of having a joint landbank with Devon and Cornwall. If this is considered to be the most appropriate way forward, informed by feedback from the SW AWP and the framework set by local planning policy, the mechanism for delivering such an approach already exists through the annual LAAs process.

- 3.7. It is envisaged there may come a time when extraction that supplies the Whiteball operations will begin in Somerset. Indeed, the operator of the Whiteball operations (Hanson) is already in discussion with Somerset County Council's planning department about plans for extraction on the Somerset side of the border (see the County Council's response to question 4 below).
- 3.8. The position will be monitored via the Somerset LAA.
- 3.9. A joint LAA with Devon County Council would not be practicable, noting Somerset's nationally significant crushed rock supply from the Mendip Hills in the east of the county. To combine Somerset's crushed rock landbank with Devon's could undermine the approach to adequate and steady supply of crushed rock from Somerset.

Question 4

The Somerset 2013 LAA notes that no land based extraction of sand and gravel has taken place for the last 10 years in Somerset. Does this mean there is no current landbank or are there inactive quarries with reserves (and reviewed conditions) that might contribute to a landbank?

SCC Response

- 4.1. There are no extant planning permissions that might contribute to a landbank for sand and gravel in Somerset.
- 4.2. Somerset is a nationally significant producer of crushed rock, making an important contribution of material extracted from Somerset to national, regional and local aggregate supply.
- 4.3. Somerset's crushed rock sites have the potential to generate sand and gravel products which can be marketed alongside the main crushed rock output (see paragraph 2.26 in the Somerset Local Aggregate Assessment 2014 (SD23b)). Thus those sites have the potential to meet some of the demand for sand and gravel products. However, it would be inappropriate to consider the permitted reserves of crushed rock sites to be permitted reserves for sand and gravel.
- 4.4. The focal points for sand and gravel operations – such as they are – in Somerset are the Whiteball operations near the county border with Devon, coupled with Dunball Wharf for importing marine-dredged sand and gravel.
- 4.5. It is worth noting the rather complex history of the Whiteball operations, and explaining its current position.
- 4.6. As acknowledged by the British Geological Survey (BGS) in their report on "Mineral Resource Information in Support of National, Regional and Local Planning: Somerset (Doc Ref TD39) extraction of sand and gravel has historically taken place in Somerset, working the Budleigh Salterton Pebble Bed (BSPB) formations. The BGS report states that the site termed Whiteball East has been dormant for some years but was temporarily reactivated and yielded significant quantities of sand in 1996/1997.

- 4.7. Planning permission (number 4/44/99/008) was granted by Somerset County Council in 1999 based on an application to extract approximately 400,000 tonnes of sand and gravel in a field opposite the Whiteball processing site. Permission for extraction ran until May 2010. A section 73 application was made to extend the duration of the 4/44/99/008 permission.
- 4.8. When that s73 was being processed, it came to light that the proposed destination for extracted material (the processing area off Greenham Lane, opposite the application site), did not have planning permission (though it may once have been permitted development) and highways raised concerns regarding HGV vehicle routeing because it could not be assumed that material from the extraction site would be taken to this processing area. In effect the s73 was not considered any further until this issue of lawful use was resolved.
- 4.9. A Certificate of Lawfulness of Existing Use or Development (CLEUD) application (number 4/44/12/0011) was made to regularise the processing site and this was determined on 11/06/2013 and the outcome was that the processing site, in its current form at that time, was deemed lawful.
- 4.10. This indirectly resolved the highways concern previously raised.
- 4.11. The current s73 is still on hold, awaiting either further information or a new application from the operator.

Question 5

Based strictly on 10 years' sales data, it might appear that there is currently no requirement for a 7 year landbank to be maintained in Somerset. However, besides sales data, forecasts of demand should take account of other relevant information. What other information is relevant to Somerset?

SCC Response

- 5.1. It is important to acknowledge the supply of sand and gravel from other Mineral Planning Authority (MPA) areas, in particular Devon and Dorset, and review the demand forecasts from Devon and Dorset County Councils in their respective Local Aggregate Assessments.
- 5.2. The sub-regional position is summarised in the MoU (SD13c) which also reflects agreement of the other Mineral Planning Authorities to the proposed approach taken by Somerset County Council.
- 5.3. Somerset County Council is mindful that reserves at the Town Farm site in Devon are expected to run until the early 2020s (as mentioned in paragraph 6.77 of the Somerset Minerals Plan) and that the planning permission at Chard Junction expires in 2023.
- 5.4. Recent Devon and Dorset LAAs are included in the SCC's evidence base (see **Doc Refs TD40b and TD40c** respectively).

- 5.5. Review of Somerset County Council's draft LAAs in 2013 and 2014 – in particular by the South West Aggregates Working Party has helped to ensure that the County Council takes account of relevant local information.
- 5.6. Feedback from the SW AWP has not identified that the County Council has overlooked any relevant other information.

Question 6

Taking account of other relevant information, should Somerset be seeking to make its own provision for land won sand and gravel from within Somerset during the Plan period?

SCC Response

- 6.1. Somerset County Council is taking appropriate steps to ensure adequate and steady supply of land-won sand and gravel during the plan period.
- 6.2. Somerset County Council has agreed a joint approach on a sub-regional basis, which acknowledges the different contributions made by different sources of supply over time.
- 6.3. As stated in the MoU (SD13c), which has been signed by Somerset County Council, Cornwall Council, Devon County Council, Dorset County Council, Exmoor National Park Authority, Gloucestershire County Council and Wiltshire Council, there are several sources of supply that in combination meet local need in Somerset.
- 6.4. A joint approach to sand and gravel provision, and future dialogue with relevant MPAs, industry and the SW AWP will identify at what time any further action is needed to promote sand and gravel extraction from within Somerset during the plan period.
- 6.5. As noted in answer to question 4, Somerset County Council is continuing a long-running dialogue with Hanson regarding its proposals for future extraction to support the continued operation of the Whiteball operations.
- 6.6. Meanwhile, the Somerset Minerals Plan has identified a Preferred Area and Area of Search to give a degree of confidence about delivery; and policy SMP4 includes a criteria-based policy for other potential areas should they come forward.
- 6.7. Further changes are proposed to the text supporting policy SMP4 that emphasise the need for extraction in Somerset and provide greater clarity when considering applications – see the Appendix for this statement and the **Schedule of Proposed Changes, v2 (Doc Ref SD6c)**.
- 6.8. It is noted that no other proposed location for sand and gravel has been presented to the County Council as part of the plan-making process.
- 6.9. It would be premature for the Plan to allocate sites for sand and gravel at this stage, noting the lack of interest from industry in sites for sand and gravel extraction in Somerset (except for interest in the continuation of Whiteball

operations) and the lack of information on available resources other than those around the Whiteball operations.

- 6.10. The final sentence in the introductory paragraph to the sand and gravel section of a report by British Geological Survey (BGS) on **Mineral Resource Information in Support of National, Regional and Local Planning: Somerset (comprising Somerset, North Somerset, the City of Bristol, and part of Exmoor National Park) (Doc Ref TD39)** states: *“Resources are limited and there is virtually no land-won production of sand and gravel and no reported permitted reserves”*.
- 6.11. As made clear in the BGS report, extraction of sand and gravel in Somerset has taken place around the Whiteball operations, working the BSPB formation (also see response to question 4).

Question 7

Should Somerset be seeking to establish its own rolling 7 year landbank?

SCC Response

- 7.1. It is considered premature for the reasons outlined in response to the above questions.
- 7.2. As stated previously, it is noted that the operator of the Whiteball operations (Hanson) is already in discussion with the County Council's planning department about plans for extraction on the Somerset side of the border. Therefore the County Council is already taking an active part in the discussion about what contribution it can make to sub-regional supply.
- 7.3. As things stand, there are no current workings in Somerset, the County Council has not had a request for sites to be included in the Plan, we have received no applications for other sand and gravel quarries, neighbouring Mineral Planning Authorities have expressed agreement with our proposed approach and we have a preferred area for working already identified.
- 7.4. Going forward, the County Council will work with the SW AWP to ensure that it takes an appropriate approach to this issue, mindful of national policy and guidance.

Question 8

What are the views of the South West Aggregate Working Party?

SCC Response

- 8.1. Sand and gravel supply from Somerset was not raised as an issue when the draft Somerset LAA 2014 was discussed by the SW AWP on 19 May 2014.
- 8.2. In reviewing the draft Somerset LAA 2014, draft comments from the SW AWP sent on 08 June 2014 did not mention sand and gravel supply from Somerset.

- 8.3. Final comments on the draft Somerset LAA 2014 from the SW AWP, received on 16 June 2014, included the following additional point:
“It is noted that land won sand and gravel extraction may take place near the Somerset/Devon border as provided for in the Council's Mineral Plan. The future identification of an LAA amount for land won sand and gravel in Somerset will be affected by the lack of sufficient (10 year) sales data and (unless these are relaxed) confidentiality restrictions. The County Council should give some consideration as to how this problem might be addressed”.
- 8.4. Somerset County Council gave the following written response to this final comment from the SW AWP:
“The issue of maintaining the steady and adequate supply of sand and gravel (the final comment from the SW AWP) is a matter that is embedded within a Memorandum of Understanding on sand and gravel signed by Somerset County Council, Devon County Council and a range of other Mineral Planning Authorities in the South West. As a result this will be picked up via engagement with partners, in particular Devon County Council, within future work on the Somerset Local Aggregate Assessment”.
- 8.5. SCC's responses to the SW AWP comments were accepted by the SW AWP Secretary on 26 June 2014 as adequately addressing the comments, and no further comments from SW AWP Members were received.
- 8.6. It is envisaged that the County Council will discuss sand and gravel supply with the SW AWP at future meetings and during the process of updating its Local Aggregate Assessment each year.

Question 9

Policy SMP4 refers to the Preferred Area and the Area of Search on Map 2. What difference (if any) in weight is intended to be given to planning applications for sites within each of these two types of area? Should any intended difference be reflected in the Plan?

SCC Response

- 9.1. The Glossary (Appendix A) of the Somerset Minerals Plan (SD1) defines Preferred Area and Area of Search. This distinguishes between the two areas.
- 9.2. There is no difference in the policy weight between the two areas when determining planning applications.
- 9.3. More is known about the resource in the Preferred Area and Hanson has already expressed an interest in working land in the lower half of the Preferred Area – as shown in the **Map showing Hanson application in context of Preferred Area (Doc Ref TD64c)** (linked with permission number 4/44/99/008 and the s73 discussions mentioned in answer to question 4 above).

Question 10

Is the location and extent of the Preferred Area/Search Area the most appropriate?

SCC Response

- 10.1. As mentioned earlier in this statement, according to BGS, resources of sand and gravel in Somerset are limited.
- 10.2. That said the Preferred Area and Area of Search do seek to capitalise on the known areas of extractable resource – namely working the BSPB Formation (also see response to question 4).
- 10.3. In other words, the identified areas capitalise on what is known through previous extraction and research, with extraction having taken place on the Somerset side of the border (historically) and more recently extraction focused on the Devon side of the border.
- 10.4. Exemplifying this knowledge, a **Planning statement Whiteball application (Doc Ref TD64a)** submitted by Hanson Quarry Products Europe Ltd to Somerset County Council in 1999 states that the pebble beds are Hanson's horizon of economic interest. Their thickness varies between 13 to 28m. The pebble beds consist of poorly sorted fine sands to gravels in a matrix of silty sands. The product from processing this material is a high quality quarzitic aggregate suitable for high specification construction uses.
- 10.5. The Preferred Area and Area of Search also support the continued operation of Whiteball processing facilities, thereby providing a robust, deliverable approach to continued supply, and in effect forming an extension of existing operations rather than a brand new approach
- 10.6. Linked with this continuation of operations is a stability factor i.e. it is noted that the Preferred Area and Area of Search Plan reflect a continuation of the approach taken in the **Minerals Local Plan (adopted 2004) (Doc Ref SD19a)** and thus provide stability for interested parties.
- 10.7. No evidence has been presented to the County Council regarding the viability / availability of extractable sand and gravel deposits in other areas of Somerset.
- 10.8. Other potential locations for sand and gravel extraction have not come forward during the consultation process.
- 10.9. In summary, it is considered reasonable to take forward an approach that has been long-standing adopted planning policy in Somerset and which has been supported during the consultation process on plan-making.

Question 11

Why are other Mineral Safeguarding Areas for sand and gravel not included within the Preferred Area/Search Area?

SCC Response

- 11.1. It is noted that other areas of sand and gravel resource have been identified for safeguarding in Map 9 of the Somerset Minerals Plan; however, as stated above, it is considered reasonable to take forward an approach that has been long-standing adopted planning policy in Somerset and which has been supported during the consultation process on plan-making.
- 11.2. Continuing the adopted approach in spatial terms also provides a degree of stability and confidence to industry and other interested parties about the most likely area for future working in Somerset.
- 11.3. Furthermore, Somerset County Council acknowledges the important contribution made by Whiteball processing operations to supply in Somerset and Devon. It is logical for the Somerset Minerals Plan to give a clear spatial steer toward working in the area, noting the identified areas capitalise on what is known through previous extraction and research, and helping to ensure continued supply from the Whiteball operations.
- 11.4. As stated by BGS, sand and gravel resources in Somerset are limited. Safeguarding other resources of sand and gravel acknowledges the presence of other resources; but it is not considered appropriate to extend the spatial steer beyond a section of the Pebble Bed resource as shown, since the County Council is not aware of any proposals to work other resources, there are no extant permissions and there is a lack of evidence on future potential.
- 11.5. Thus safeguarding is adequate for the other areas and has the potential to prompt discussions with the District Councils about prior extraction of sand and gravel at a site identified for non-mineral development, which could help to supply valuable material to that development and reduce road miles of materials used.

Question 12

What is the justification for requiring applicants for planning permission outside the Preferred Area/Search Area to demonstrate that the proposed site offers net environmental benefits over those within the Preferred Area/Search Area?

SCC Response

- 12.1. It is considered reasonable to assess the benefits of a proposal in a proposed location other than the Preferred Area or Area of Search, noting that there is significant experience of sand and gravel operations in the Whiteball area and support from the County Council for those operations to continue.
- 12.2. In particular it is important to consider the transport implications of extracting material from another location, and the proposed wording would help to

ascertain whether the case for extraction at that alternative location compared favourably to the current arrangements.

- 12.3. All policy options have been considered via Sustainability Appraisal (SA) and, in the case of sand and gravel, the **SA (Doc Ref SD2a)** noted that focusing activity in the area around Whiteball operations would avoid impacts being felt in other parts of the county.
- 12.4. It is noted that the Preferred Area and Area of Search have been used in the Development Plan as adopted policy (via the Minerals Local Plan adopted in 2004). Thus they have already been rigorously assessed in the plan-making process for the Minerals Local Plan. Other areas have yet to be considered in this way.

Question 13

Is it appropriate to specify general buffer widths around aggregate quarries or should buffers be established on a site specific basis? (See also Mineral Safeguarding below)

SCC Response

- 13.1. Noting the lack of extraction sites for sand and gravel in Somerset, it is considered appropriate to base the safeguarding area for sand and gravel on the identified resource.

Question 14

What has the demand for sand and gravel been in Somerset over the past 10 years?

SCC Response

- 14.1. As stated in section 3 of the Somerset Local Aggregate Assessment 2014 (SD23b) sand and gravel imports into Somerset totalled 378,000 tonnes in 2009 (linked with the 4 yearly aggregate minerals survey for England and Wales 2009 results – see Table 10 in the Collation of the Aggregate Minerals 2009 Survey). When combined with marine-dredged sand and gravel (39,000 tonnes) this yielded a total level of imports into Somerset of 417,000 tonnes in 2009. The same level of importation was recorded in to Somerset and Avon in the 2005 Aggregate Minerals Survey.
- 14.2. Given that the planned Aggregate Mineral Survey for England and Wales 2013 was postponed, the above data provide the best snapshot on imports of sand and gravel into Somerset, and – given that the county does not extract its own sand and gravel – the best reflection of demand since 2005.
- 14.3. It is not possible to provide a yearly figure of demand for sand and gravel in Somerset, noting the lack of extraction of sand and gravel in Somerset.

Question 15

What is the forecast for demand and what is this based on?

SCC Response

- 15.1. Historically the acknowledged process for calculating level of provision has been via apportionment (and sub-regional apportionment), as stated in the National and Sub-National Guidelines.
- 15.2. Following the introduction of the National Planning Policy Framework and Local Aggregate Assessments, there is now a shift toward locally derived levels of provision, based on the average of 10 years sales and other relevant local information, taking account of feedback from the relevant AWP.
- 15.3. Somerset County Council is not in a position to calculate a level of provision based on 10 years sales as detailed in the Minerals Plan and in answer to the questions above. The demand forecast must therefore be informed by the data available.
- 15.4. This includes the forecasts undertaken by “supplier” Mineral Planning Authorities in their respective LAAs, as well as related research undertaken by Somerset County Council in preparing its own.
- 15.5. Furthermore, the next Aggregate Mineral Survey for England and Wales can provide an indicator of the recent trend in the demand for sand and gravel in Somerset (linked with the level of imports into Somerset). Data from that survey will be embedded in respective LAAs and can inform future plans.

Question 16

Can this demand be broken down into a) soft sand/building sand; b) sharp sand/concreting sand; c) gravel? If so, what are the tonnages/proportions for each?

SCC Response

- 16.1. The demand in Somerset cannot be broken down into different types of sand and gravel, recognising that extraction of these materials does not currently occur in Somerset.

Question 17

How is the demand for each of soft/building sand, sharp/concreting sand, and gravel to be met?

SCC Response

- 17.1. The demand for different types of sand and gravel in Somerset is met from the breadth of sources of relevant material, as stated above.

- 17.2. Whiteball operations represent a key source of material, currently supplied via extraction at the Town Farm quarry site in Devon. These operations supply a range of products, including soft sand, sharp (coarse) sand and gravel. Devon County Council does not maintain separate landbanks for the different product types generated. As noted in the 2nd Devon Local Aggregate Assessment (Doc Ref TD40b): *“While some MPAs distinguish between sharp sand and soft sand in their landbanks and LAA, the nature of Devon’s sand and gravel resources does not warrant such a distinction, with resources such as the Budleigh Salterton Pebble Beds and Aller Gravels being capable of providing concreting (sharp) and building (soft) sand together with gravel fractions.”*
- 17.3. The Chard Junction site on the Dorset border works River Terrace deposits which again supply a range of products focused in particular on sharp sand and gravel.
- 17.4. Chard Junction quarry produces coarse sands and gravels for a variety of uses, including the manufacture of concrete products (pre-cast, ready-mixed concrete), single sized gravels for decorative use (driveways, horticulture, etc) and aggregates for general construction purposes – see **Aggregate Industries supporting statement Chard Junction (Doc Ref TD65)**.
- 17.5. Dunball Wharf is a strategic location for marine-dredged sand and gravel in Somerset.
- 17.6. Crushed rock sites also contribute a range of “fine” materials to the market, including those derived from scalplings material, whilst their primary focus remains on producing and selling crushed rock aggregate.
- 17.7. No issues have been raised (in particular via the SW AWP) in meeting the demand for sand and gravel in Somerset, and it is envisaged that the current arrangements will continue.
- 17.8. Further dialogue with industry, neighbouring MPAs (in particular Devon County Council) and the SW AWP will inform future action regarding extraction of sand and gravel within Somerset to maintain future supply.

Question 18

What kind of sand is the marine dredged sand that is landed at Dunball?

SCC Response

- 18.1. The marine-dredged sand and gravel supplied via Dunball wharf is distributed into the immediate markets around the wharf, principally as a fine material in the production of concrete.
- 18.2. Contextual information regarding quantities of marine-dredged sand and gravel and dredged areas is available via **The Crown Estate Marine Aggregates 15th report (Doc Ref TD70)** and **The Crown Estate Marine Aggregate Statistics 2013 (Doc Ref TD71)**.

Question 19

What kind of sand is extracted at Whiteball?

SCC Response

- 19.1. The sand and gravel operations at Whiteball work the BSPB formation, which is also quarried at several other sites in Devon. Although this formation extends from the East Devon coast in the south across Somerset to the Bristol Channel, working of it for sand and gravel north of the Whiteball area is impractical due to the increasing degree of cementation.
- 19.2. The BSPB provide a wide range of quarry products including crushed quartzite for roadstone and concrete and, in contrast to other parts of the country, produce both soft and sharp sand due to the presence of coarse and fine sands within the same locality.
- 19.3. As noted in Devon County Council's **Assessment of Sand & Gravel, Crushed Rock and Secondary Aggregate Resources in the County of Devon (Doc Ref TD69, page 22)** "*The sand fraction finds uses in concrete, mortar and asphalt... This hybrid use of the BSPB is very attractive to quarry operators*".
- 19.4. The proportion of sand to pebbles in the BSPB increases from south to north, as does the proportion of fine to coarse sand, resulting in Whiteball yielding a higher proportion of soft sand (but still less than its output of sharp sand) than is the case with the quarries in the south of the BSPB.
- 19.5. According to the **Planning statement Whiteball application (Doc Ref TD64a)**, sand and gravel from the "Whiteball pit" is used by the construction industry in the production of concrete products, pre-cast blocks and mortar. It is also used for pebble dash, pipe bedding and as a surface dressing for minor roads. Whiteball pit also supplies sand and gravel materials in bags, along with building sand for sale by general building suppliers.
- 19.6. The planning statement further states that the BSPB is underlain by the lower marls, which comprise of very fine sandy silts and clays. The pebble beds are the horizon of economic interest. The thickness of these varies between 13 to 28m. The pebble beds consist of very poorly sorted fine sands to gravels in a matrix of silty sands. The product from processing this material is a high quality quartzitic aggregate suitable for high specification construction uses.
- 19.7. It is noted that there is a significant overlap between the uses for sand and gravel from Whiteball and Chard Junction quarries. The main difference is that the quartzite from Whiteball operations (and other Pebble bed quarries) is suitable for higher specification uses such as surface dressing chippings.
- 19.8. Devon County Council's **Whiteball Summary (Doc Ref TD72)** includes photographs of the Town Farm quarry which help to give a sense of the type of material being extracted, as well as additional geological detail.

Question 20

The 2013 Somerset LAA indicates that Somerset relies on imports of sand and gravel to meet demand, about 65% of which comes from Dorset, with Chard Junction Quarry on the Somerset/Dorset boarder being a large contributor. It also notes that Chard Junction has an active permission running until March 2023, by which time it is estimated that reserves will have been worked out. What contingency plans are in place to ensure Somerset's demand for sand and gravel is continued to be met?

SCC Response

- 20.1. Somerset County Council has sought for Dorset to maintain its contribution to sub-regional supply. This was reflected in **Somerset County Council's statement to Dorset Minerals Strategy examination (Doc Ref TD67)** – see SCC's response to question 6.
- 20.2. Dorset's Local Aggregate Assessment (Doc Ref 40b) and the adopted **Bournemouth, Dorset and Poole Minerals Strategy (Doc Ref TL27a)** embed an approach to provision based on the average of ten years sales. In turn, this embeds a level of provision for the current market for Dorset's sand and gravel products, which includes an important market in Somerset.
- 20.3. Somerset County Council will engage with Dorset County Council further on this issue, not least as part of the dialogue within the SW AWP.
- 20.4. Meanwhile, the Preferred Area and Area of Search in Somerset will support the delivery of sand and gravel mineral extraction in Somerset as an important part of the County Council's contingency plans to ensure that Somerset's demand is continued to be met.

Question 21

Is there a Memorandum of Understanding between Somerset and Dorset relating to supplies of sand and gravel from Dorset and crushed rock from Somerset?

SCC Response

- 21.1. The Memorandum of Understanding (SD13c) is signed by a range of partners including Dorset County Council. There is not a separate MoU that focuses explicitly on the imports/exports between Somerset and Dorset.

Question 22

To what extent do marine dredged, secondary and recycled sources contribute to meeting demand?

SCC Response

- 22.1. Marine-dredged sand and gravel contributes to between 5-10% of demand.
- 22.2. 105,770 tonnes of recycled aggregate were sold in Somerset in 2013, as reported in the Somerset LAA 2014. It is not known how much of this total may be considered to be meet demand for sand and gravel.
- 22.3. The Somerset LAA 2014 also includes data on secondary aggregate sales. Secondary aggregates do not make a significant contribution to meeting demand of sand and gravel in Somerset. Somerset is not a significant producer of secondary aggregates and, though the Minerals Plan can – and does – support the provision of secondary aggregates, in reality their production depends on the presence of other industries.

Question 23

Overall and in brief summary, how will Somerset ensure a continued supply of sand and gravel throughout the Plan period?

SCC Response

- 23.1. Somerset County Council's approach to the steady and adequate supply of sand and gravel depends on the continuation of the current approach, which has been shown to be adequate i.e. there is no evidence that there are risks to the current supply of sand and gravel in Somerset, and further co-operation with neighbouring Mineral Planning Authorities, in particular Devon and Dorset County Councils.
- 23.2. The application from Hanson permitted by Somerset County Council was based on extraction levels of approximately 400,000 tonnes in total and this was expected to last in the order of 10 years, subject to market demand and the quality of the material from Town Farm (acknowledging plans to blend material from Town Farm with material extracted from the Somerset side). Somerset County Council anticipates further discussion with Hanson about sand and gravel extraction in Somerset.
- 23.3. If the demand increases, linked with a new phase of construction in Somerset, industry feedback suggests there remains scope for well-established existing facilities to increase their output.

END

**APPENDIX – PROPOSED FURTHER CHANGES ON SAND AND GRAVEL
(integrated within Doc Ref SD6c)**

SAND AND GRAVEL (in chapter 6)

Consider revising supporting text to make more explicit our need for permitted reserves of sand and gravel i.e. identifying this as a more pressing priority.

6.77 As a result, Somerset does not have a 10 year average that can inform any potential future provision.³⁵ ~~However, it is intended to maintain provision for future working of sand and gravel from within Somerset to supply the Whiteball operation following the anticipated cessation of the Town Farm site within Devon in the early 2020s. However, through close cooperation with neighbouring Mineral Planning Authorities, the minerals industry and the South West Aggregates Working Party, Somerset County Council can ensure that a steady and adequate supply of sand and gravel is maintained.~~

NEW PARA 6.78

Somerset County Council encourages proposals to come forward for sand and gravel extraction that are in accordance with relevant policies in the Development Plan and contribute to sub-regional supply. Informed by updates to the Somerset Local Aggregate Assessment, the need for new sources of sand and gravel is anticipated to become more pressing in the early 2020s, notwithstanding there may be benefits of proposals coming forward more quickly.

REVISED PARA 6.78 (now 6.79)

6.79 Somerset County Council plans to maintain provision for future working of sand and gravel from within Somerset to supply the Whiteball operation following the anticipated cessation of the Town Farm site in Devon in the early 2020s. To deliver this maintain sub-regional supply (contributing to Devon's existing landbank for sand and gravel and maintaining production at Whiteball) Somerset County Council has extended will extend the approach established in the Minerals Plan (adopted 2004) which outlines a Preferred Area and Area of Search adjacent to Gipsy lane, Greenham (see map2), and uses a criteria-based approach to consider proposals elsewhere in Somerset.

END