Dear Laura

Milton Keynes Local Aggregate Assessment (LAA) 2017

Thank you for consulting SEEAWP on the Milton Keynes LAA.

At the meeting of 6 November 2017, SEEAWP considered the report 17/06A that summarised and commented on the South East LAAs. It further discussed each mineral planning authority’s LAA.

SEEAWP agreed with the conclusions of the draft Milton Keynes LAA and noted the limited landbank that was reported. However, SEEAWP appreciated that the recently adopted mineral local plan allocated sites that could address this deficiency.

The attached draft Minute summarises the discussion and conclusions. I hope you find these helpful.

If you have any queries please contact me

Yours sincerely,

Richard Read
SEEAWP Technical Secretary
4. Local Aggregates Assessments (LAA) 2017

- The Chairman reminded members of the advice in the Planning Practice Guidance that AWPs should ‘consider, scrutinise and provide advice on the Local Aggregate Assessments of each mineral planning authority in its area’. LAAs should also include a picture of emerging trends.
- The Secretary thanked everyone for submitting their LAAs and introduced SEEAWP 17/06A and referred to the following general points:
  - Importance of the checklist attached to 17/06A for the preparation of LAAs.
  - Need both a ‘dashboard’ and Executive Summary for each LAA.
  - All the supporting evidence indicates an increase in aggregate demand and the need to think about how this should be addressed.
  - Whether a ‘contingency’ and a ‘stress test’ approach should be adopted in the preparation of LAAs to establish the flexibility of supply arrangements. This would indicate what will happen if demand were to increase and how mpas would deal with this.
- DP commented that it would be difficult to justify a blanket contingency percentage but that provision of flexibility of in mineral plans is critical. LAAs should acknowledge that 10 yr average sales as the LAA ‘Rate’ is not necessarily an approximation of future needs.
- PD commented that if the 10 year sales averages are decreasing when the demand is increasing, this indicates a problem. However, there are also issues with getting political acceptance for flexibility in mineral plans.
- JB agreed with the idea that the LAA’s should include a stress test on current reserves.
- A discussion on each LAA was followed the general debate.
- **An individual letter will be sent to each mpa:**

**Buckinghamshire**

- EB stated that there was currently a healthy landbank. There was a low response rate to the recycled aggregate survey and more data was needed on capacity.
Central and East Berkshire

- MS said that a new format had been used for the CEB and Hants LAAs in order to produce a succinct document, which contained links to external documents for extra explanation if that was required. MS wished to hear what others had to say about the new approach.
- Due to growth pressures, it is considered that the 3 year average is the most relevant LAA Rate but that there was need to consider the impact of imports on demand in Plan area.
- The Secretary and Chairman advised that the LAA should include a ‘dashboard’ as well as an ‘executive summary’.
- The Chairman highlighted that the dashboard needed to include the LAA rate. MS recognised this was missing and should include the 3 year average as discussed.

Hampshire

- MS stated that this LAA was also similarly prepared in the new style and that this LAA had been updated following advice from RR.
- Wharf capacity is not as healthy as historical data had suggested. Return data suggests that wharves are operating at 90% capacity which leaves little headroom to increase supply if demand increased.
- The Chairman and Secretary advised the need for an executive summary.

Isle of Wight

- CM stated that the last 3 years of aggregate production had been relatively high in comparison to past 10 years.
- Looking to start work on a new Core Strategy.
- Currently no solution to how to increase wharf capacity as a result of the newly refurbished chain ferry, this is especially an issue as the majority of aggregate supply is marine sourced. If larger vessels are required IoW may need to become a satellite of Southampton Wharves. This may have implications for Hampshire.
Oxfordshire

- PD stated that there was a significant increase in sales of sharp sand and gravel from 2013 to 2015. However, this fell back in 2016, although it was still above the 10yr average. Some operational issues at one quarry accounts for most of this decrease.
- There is public and political pressure to decrease the current (2014) LA Rate for sharp sand and gravel, which is above both the 10 year and 3 year averages.
- In contrast, 2016 sales and the 3 year averages for soft sand and crushed rock are above the current (2014) LAA Rates, which could indicate they should be increased.
- Landbank figures show a pretty healthy position except for soft sand (although further permissions were granted in 2017).
- PD disagreed with the comment in 17/06A that there is a query whether the adopted LAA rate is adequate as this was not the case for sharp sand and gravel.
- PD stated that the 2017 LAA was still very much a draft in preparation but that the methodology would be difficult to update now that the national AMRI sales figures are not available.
- PD said it had not yet been decided whether the current (2014) LAA Rates should be changed and that the advice of SEEAWP would be helpful in considering this.
- SM stated that sharp sand and gravel sales were above the 10yr average, in line with the 3yr average and new reserves at Caversham have come on stream in 2017, which should increase sales, and to change the LAA Rate based on reduced sales in a single year would be a knee jerk reaction especially considering that the MWLP Core Strategy has only recently been adopted. He also thought the LAA Rates for soft sand and crushed rock should be retained at the current levels and that it was too soon to consider increasing them.
- TG stated the LAA Rate is just above the average 10 year sales however the increased demand in housing needs to be factored into the LAA.
- PD noted these points.
- It was agreed that SEEAWP would advise Oxfordshire that the initial response would be that current LAA Rates were appropriate and that the situation should be monitored.
Medway

- TG stated The LAA Rate is just above the average 10 year sales average, however the increased demand in housing needs to be factored into the next LAA.

Milton Keynes

- LD stated that there was only a 3yr landbank and only three permitted sites.
- Recently adopted a new Minerals Local Plan, which allocates four sand and gravel sites, which could help the current shortfall in supply.
- Noted MK has lots of aggregate hungry projects, but these have been factored into the adopted LAA Rate. However, the situation would be monitored as the Rate was based on earlier periods of sales.

East Sussex/SDNPA/B&H

- PR stated that they are currently running a ‘call for sites’ and that next year they will be expanding upon their purely factual LAA.
- RF replied that their current LAA figure is woefully low. PR responds that the Authorities acknowledged that their aggregate provision policy required review (hence the current Call for Sites), and that the LAA Rate (0.1 mtpa)) is nominal.
- The Chairman noted that the 10 year average sales figure was classed as confidential (because it contained sales from just two operators), but queried whether this could be displayed.
- RF stated that Brett was happy for their data not to be classed as confidential. (Hence the three years sales figure which does not include other operators is public) JB agreed with this in principal.
- DP reported that the MPA’s Environment Committee had discussed this and agreed that is for individual companies to waive the ‘confidentiality’ agreement. Secretary’s note – see Minutes under ‘Surrey’.

West Berkshire

- AM explained that WBC had not been able to prepare a full LAA, but had, as an interim arrangement, produced an updated dashboard.
- Much of the data was confidential, but to it being perceived as commercially sensitive, but the figures provided showed that recycled aggregates and imports via rail depots were generally
increasing, while primary aggregate production was generally decreasing.

- AM agreed with all comments in 17/06A regarding West Berkshire’s produced LAA dashboard and the figures therein.
- The ‘Preferred options’ for the minerals and waste plan had been consulted on in May and June 2017, and since then plan-making had been hindered due to a lack of staff; it is likely that with a full team WBC would be looking to consult on a submission version of the plan end of 2018 / early 2019.
- A full LAA would be prepared early next year.
- **SEEAWP would advise West Berks of an appropriate initial response**

**Kent**

- BG prefaced the discussion with the information that the LAA Rates were incorrect and should be: Soft Sand – 0.46 Mt and Sharp Sand and Gravel – 0.45 MT. The total will therefore be 0.95 Mt.
- Soft sand has a healthy landbank however the one sharp sand and gravel is under pressure.
- Kent are having to rely more on marine and recycled aggregate.
- The figures for the LAA were to be revised before the end of the month and a full LA submitted.
- RF and BG will discuss sales figures after the meeting (to ensure that reserves in East Sussex had not inadvertently been included in Kent figures).
- **SEEAWP would advise Kent of an appropriate initial response**

**West Sussex**

- RS stated that due to the public examination of the Joint Minerals Local Plan, there had not been the opportunity to complete the LAA in full. A dashboard of interim results was submitted, applying the same methodology as previous LAAs (taking account of 10 year average sales and future housing and highways infrastructure spending). This showed the LAA Rate was currently steady. There was increased marine sand extraction, however, still sufficient capacity headroom at wharves.
- Soft sand will be the subject of a single issue review of the Joint Minerals Local Plan.
- A full LAA will be submitted before the end of the year.
- **SEEAWP** would advise West Sussex of an appropriate initial response.

**Surrey**

- PS stated that Surrey had published a draft revised Development Scheme which will be considered for approval by Cabinet in June 2018. This anticipates a new minerals plan issues and options consultation in Autumn 2022, which means that background work on a revised minerals plan will need to begin relatively shortly.
- A significant difference between soft sand land bank which is well provided and that for sharp sand and gravel.
- Recycled aggregate sales were slightly down in 2016.
- The next LAA will need to look at future security of imports.
- SM asked about the timeframe to review the local plan as there was a need to think about sites for the long term and SM commented that it was disturbing the length of time taken to get sites through the planning permission process in Surrey.
- RF added that it takes on average five years to get through the planning permission process in Surrey.
- PA requested that there be a consistent approach to dealing with confidential data on the dashboards.
- The Secretary said that the matter had been discussed at previous meetings when it was agreed that 3 and 10 yr average sales could be used when single year sales would enable data on a single site to be calculated. Nevertheless, mpa should use good judgement in consultation with the relevant operator(s) if they intend to publish sales and reserve information.
- With regard to presentation of the 3 & 10 year sales trend on the dashboard, it was agreed that mpa should follow the POS/MPA Guidance for LAAs.