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**WOKINGHAM
BOROUGH COUNCIL**

Central and Eastern Berkshire Authorities
Joint Minerals and Waste Plan

Statement of Common Ground

between

The Central and Eastern Berkshire Authorities

and

Buckinghamshire Council

Central Bedfordshire Council

Hampshire County Council

Oxfordshire County Council

Surrey County Council

South Downs National Park Authority

West Berkshire Council

West Sussex Council

Wiltshire Council

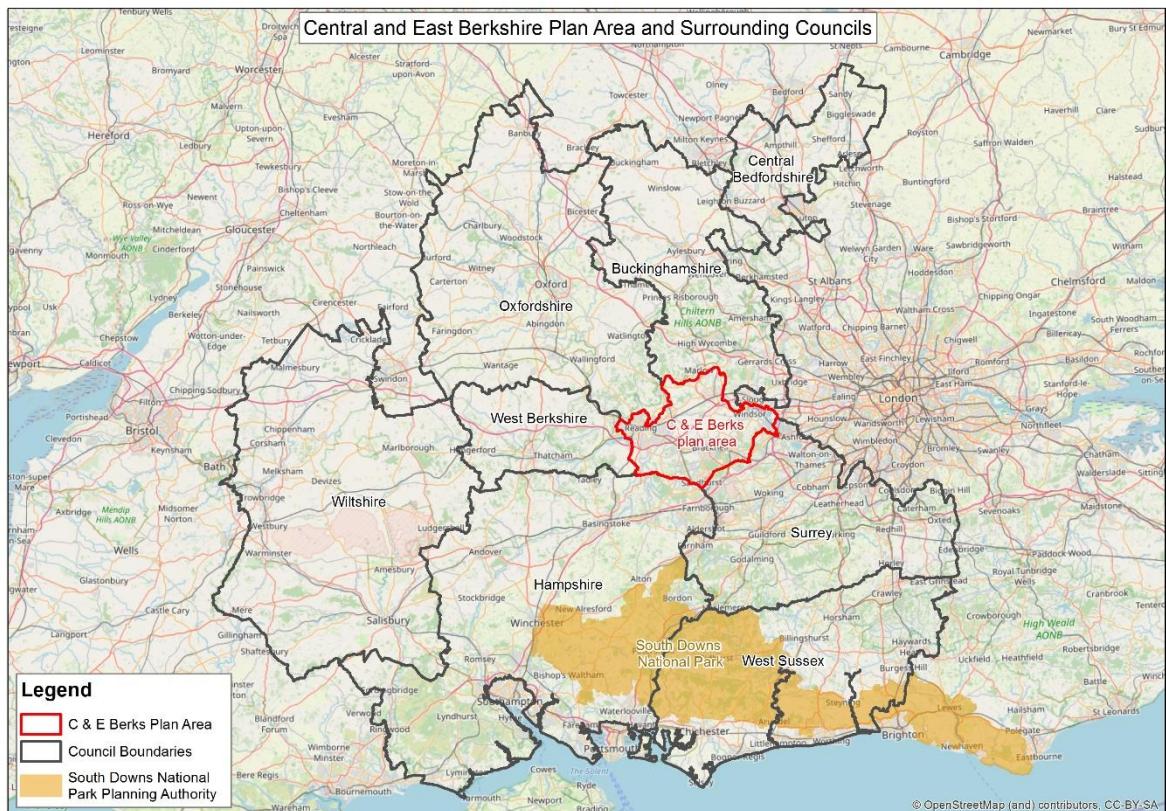
On

Soft sand supply

1. Introduction

- 1.1 This Statement of Common Ground (SoCG) is made between Bracknell Forest Council, Reading Borough Council, the Royal Borough of Windsor and Maidenhead and Wokingham Borough Council (collectively referred to as ‘Central & Eastern Berkshire Authorities’) and relevant authorities (the parties) that have some common interests in soft sand.
 - 1.2 The SoCG is being prepared in line with plan-making guidance¹, in order to comply with the requirements of the National Planning Policy Framework (NPPF)².
 - 1.3 The SoCG includes the administrative areas for the parties shown in Figure 1. It is recognised that as newer data becomes available on soft sand, the list of parties to this Statement may need to be reviewed.

Figure 1: Administrative areas of Central & Eastern Berkshire Authorities



- 1.4 The parties are entering into this SoCG to address strategic cross-boundary soft sand supply issues that affect Central and Eastern Berkshire.

¹ Planning Practice Guidance, Guidance on Plan-making, 13 September 2018, Ministry of Housing, Communities & Local Government (MHCLG) - <https://www.gov.uk/guidance/plan-making>

² NPPF, para 27, July 2018, MHCLG - <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

- 1.5 This SoCG is provided without prejudice to other matters of detail that the parties may wish to raise in the ongoing requirement to engage constructively and actively in plan preparation through the Duty to Cooperate, or in subsequent participation in the plan making process.

2. Background

- 2.1 Bracknell Forest Council, Reading Borough Council, the Royal Borough of Windsor and Maidenhead and Wokingham Borough Council (collectively referred to as 'Central & Eastern Berkshire Authorities') are working in partnership to produce a Joint Minerals & Waste Plan (the 'Plan') for Central and Eastern Berkshire, sometimes referred to as the 'Area'.
- 2.2 'Soft sand' is generally a fine-grained sand in which the individual grains are well-rounded, which provides a relatively soft texture and free-flowing nature to the material. As such, it is used in products which need to be easily worked, such as mortars and plaster and can sometime be referred to as 'building sand'.
- 2.3 In both Central and Eastern Berkshire, and neighbouring West Berkshire, soft sand is found within the Reading Formation (formerly known as the Reading Beds), part of the Lambeth Group.
- 2.4 Local Aggregate Assessments for Central and Eastern Berkshire, and prevailing industry opinion, notes that the soft sand resources in the Plan area are 'generally poor quality'. The Star Works quarry, Knowl Hill, retains approved reserves, although these may not be worked. Previously there has also been some incidental extraction at Kingsmead Quarry, Horton, although this has subsequently closed.
- 2.5 The current adopted Minerals Local Plan for Berkshire (2001)³ did not allocate preferred areas for soft sand as the material was too variable and there was a lack of information on suitable deposits.
- 2.6 Due to absence of sales data, an assessment⁴ was carried out to support the emerging Central and Eastern Berkshire - Joint Minerals and Waste Plan which examined four scenarios for estimating the future building sand requirement within Central and Eastern Berkshire throughout the Plan period. The result

³Replacement Minerals Local Plan for Berkshire (Joint Strategic Planning Unit, 2001): <https://www.bracknell-forest.gov.uk/sites/default/files/documents/replacement-minerals-local-plan-for-berkshire-2001.pdf>

⁴ Minerals Background Study (June 2018):
<https://documents.hants.gov.uk/environment/JCEBMineralsBackgroundStudyDraftPlanJune2018FINAL.pdf>

suggested that a total requirement in the region of about 1.5 million tonnes (Mt) (79,000 tonnes per year) would be required by 2036.

- 2.7 Central and Eastern Berkshire is within the South East region and is part of the South East England Aggregate Working Party (SEEAWP). Each year, aggregates data is monitored by each mineral planning authorities and collated on a regional basis to assess whether a full contribution is being made to aggregates requirements. In 2018, the South East had a collective reserve of around 24 Mt of soft sand which equates to 14 years in landbank⁵. Sales in 2018 were 1.82 Mt which was above the 10-year average (1.62 Mt) and 3-year average (1.8 Mt) sales. There was also a reported headroom of 45% capacity at operational sites. In 2018, there were 44 operational, and seven inactive, soft sand quarries and seven inactive in the South East (although this includes some permitted but not yet operational).

3. Soft Sand Study

- 3.1 To gain a better understanding of the soft sand resources, markets and supply options in Central and Eastern Berkshire, a Soft Sand Study has been prepared to inform the Joint Minerals & Waste Plan.
- 3.2 As part of the Study, discussions were held with major aggregate producers, Cemex, Grundon, Summerleaze, Aggregate Industries and Tarmac, which have or have had an interest in the area. Views were sought about the Reading Formation, opportunities for a new quarry and how the Area has and might be supplied with building sand.
- 3.3 The general view was that the resource is not of good quality as it is mixed with layers of clay. They confirmed that soft sand of this quality was not suitable for investment and that sources of supply come from outside Central and Eastern Berkshire.
- 3.4 The most recent data available on the movement of sand and gravel is the 2014 Aggregate Monitoring survey which was carried out nationally by the British Geological Survey on behalf of the Department for Communities and Local Government. Although this cannot be used to identify movements of soft sand on this scale, because soft sand is not specially identified and is included within 'sand and gravel'. In addition, the Central and Eastern Berkshire authorities were included within the wider Berkshire area.
- 3.5 A future national Aggregate Monitoring survey is planned by the Ministry for Housing, Communities and Local Government in 2020 for the period 2015-

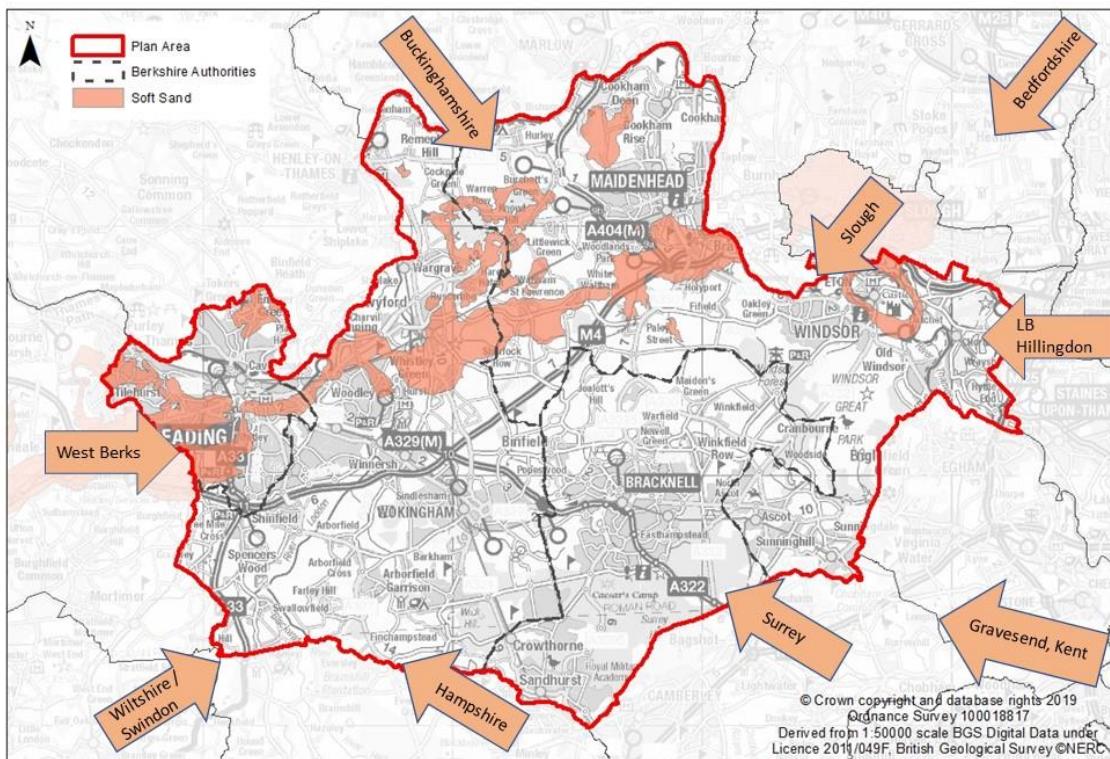
⁵ South East England Aggregate Working Party – Annual Report 2018 (January 2020).

2019. Whilst the results are not currently available to inform the Minerals Plan or the Statement of Common Ground, should they in due course indicate a different picture the Statement will be revised to include any additional relevant parties.

- 3.6 Owing to the lack of available data on the origin of soft sand supplies for Central and Eastern Berkshire, a survey was undertaken. The survey asked all builder's merchants in the Plan area about the source of the soft sand they sold. The survey was expanded to include housing developers although the response rate was very poor.
- 3.7 Figure 2 shows the results of the survey demonstrating the variety of soft sand sources currently (or recently) supplying the Central and Eastern Berkshire area, including:
 - Bedfordshire
 - Buckinghamshire
 - Kent
 - Hampshire
 - Surrey
 - West Berkshire (although supply sources have now ceased)
 - Wiltshire.
- 3.8 It should be noted that Slough and Uxbridge (London Borough of Hillingdon) were referenced in the survey. Neither of these locations has soft sand resources but both have aggregates depots. However, the Slough depot only services the immediate aggregate operations (with no onward transportation) and the rail depots at LB Hillingdon are for crushed rock⁶. Therefore, these locations were not considered further. Whilst Gravesend in Kent was also referenced, it is believed that this is in relation to supply in the form of Dry Silo Mortar rather than a specific land-won source.

⁶ https://www.london.gov.uk/sites/default/files/london_laa_july_2018.pdf

Figure 2: Sources of soft sand supply to Central and Eastern Berkshire



4. Areas of supply

- 4.1 In addition to those identified through the survey, the Soft Sand Study considers Oxfordshire and West Sussex/South Downs National Park as potential sources of supply. There is no present evidence that Oxfordshire is supplying Central and Eastern Berkshire but as a neighbouring authority with reserves, the potential is recognised and is explored further.
- 4.2 The 2014 National Aggregate Monitoring survey identified that West Sussex was supplying Berkshire with sand and gravel. West Sussex produces only limited amounts of sharp sand and gravel (on average as high as 13,585 tonnes per annum)⁷. As neighbouring West Berkshire has hitherto had its own soft sand resources, it is assumed that the supply from West Sussex is soft sand, and some will have supplied Central and Eastern Berkshire. However, if it was soft sand, this would have been extracted from the South Downs National Park. West Sussex and the South Downs National Park Authority are currently undertaking a 'Soft sand review' for their Joint Minerals Local Plan and are parties to this Statement.
- 4.3 Whilst the Soft Sand Study identified no clear favourite amongst the supply options examined, it presented various alternative sources which in the

⁷ file:///C:/Users/envnml/Downloads/mlp_adoption.pdf

absence of a local supply in Central and Eastern Berkshire can help to enable a steady and adequate supply of soft sand during the Plan period (up to 2036). These include:

- Bedfordshire – although this is some distance from Central and Eastern Berkshire it is, according to aggregates operators, already being used. The advantage is that there are adequate reserves, which can be extended.
- Buckinghamshire – has the advantage of proximity to Central and Eastern Berkshire, but further information suggests that the resource is fine glacial sand i.e. a sharp sand marketed as a building sand⁸.
- NE Hampshire – close to Central and Eastern Berkshire but both the current reserve and the longer-term prospects are limited.
- SW Hampshire – should be ruled out as a short-term option because of the distance from Central and Eastern Berkshire. It could form a longer-term option if a Local Plan allocation is permitted and other resources become constrained.
- Oxfordshire – does have a large reserve and therefore, could be a potential option for supplying Central and Eastern Berkshire in the longer-term as other resources become constrained.
- Surrey - is within a reasonable distance of Central and Eastern Berkshire and contains a significant reserve, although there may be issues of supply in the longer term because of landscape designations.
- West Berkshire – has the advantage of being close and would provide a soft sand that is traditionally used in Central and Eastern Berkshire. However, there are no reserves currently available and the landscape designation (e.g. AONB) is a major constraint on further releases unless other options are unrealistic i.e. the ‘exceptional circumstances’ test.
- West Sussex – although this is a source of current supply there are major potential landscape constraints to longer term prospects.
- Wiltshire – it is assumed that distance would rule Wiltshire out as a short-term option, but this supply option is already active.

4.4 Table 1 sets out how these mineral planning authorities can help provide short and longer-term supply options. It is assumed that in the longer-term as land-won soft sand resources become more limited, the distance material travels will increase making those currently ‘out of range’ more viable.

⁸ Information provided by operator by Aggregate Working Party meeting and subsequently confirmed by the Mineral Planning Authority.

Table 1 - Potential future supply options

	Short-term Supply Options (2020 – 2027)	Longer-term Supply Options (2027 – 2036)
Minerals Planning Authority Areas	<ul style="list-style-type: none"> • Bedfordshire • Buckinghamshire • NE Hampshire • Surrey • West Berks (<i>subject to permissions being granted in the AONB</i>) • West Sussex • Wiltshire 	<ul style="list-style-type: none"> • Bedfordshire • Buckinghamshire • Oxfordshire • SW Hampshire (<i>subject to current Plan allocation being permitted</i>) • West Berks (<i>subject to permissions being granted in the AONB</i>) • Wiltshire

4.5 The Study concludes the following points:

- Opportunities for identifying and developing a soft sand quarry in Central and Eastern Berkshire are very limited.
- Consideration should be given to creating a mineral safeguarding area (MSA) and a supporting policy to protect resources within the Reading Formation.
- A criteria-based policy should be used to assist the determination of any proposal.
- The estimated demand or requirement for soft sand (1.2 to 1.5 Mt (62,000 - 79,000 tonnes per year)) until 2036 will have to be provided by imports from other mineral planning areas and/or Dry Silo Mortar (see discussion below on alternatives).
- Evidence suggests the soft sand requirement for Central and Eastern Berkshire will have to be supplied by other mineral planning authority areas.

4.6 As there were no reported shortages of soft sand supplies in Central and Eastern Berkshire, the Study suggests that the current patterns and sources of soft sand appear to be meeting the requirements in the Plan area.

4.7 The Study recognises that Central and Eastern Berkshire cannot depend on indigenous resources. The Plan Area is in the enviable situation that there are a number of suitable supply options available and it is not dependent on any one source. This is fortunate as several of the current sources (such as West Berkshire, Hampshire, Surrey and West Sussex) have landscape (and other) constraints which may impact on future supply and other sources of supply will need to address any shortfall.

4.8 The Study recommends that a Statement of Common Ground is prepared with the relevant mineral planning authorities. These authorities will need to recognise the existing movements of soft sand and in order to continue the supply, take into consideration the soft sand needs of Central and Eastern

Berkshire in their plan-making, as required by the National Planning Policy Guidance (paragraph 60)⁹. In the event supply patterns cannot be maintained alternatives will be explored under the Duty to Cooperate in the preparation of Plans.

5. Local Plans

- 5.1 Mineral Planning Authorities are required to prepare Plans for providing a steady and adequate supply of minerals. National policy also states that these Plans need to be reviewed at least every five years to determine whether they are effective.
- 5.2 Table 2 outlines the Local Plan status for the Authorities that have been considered as part of the Soft Sand Study.
- 5.3 Only Buckinghamshire and West Sussex and South Downs National Park Authority have recently updated adopted Plans. The Buckinghamshire Minerals & Waste Plan recognises that there are no substantial soft sand resources within Buckinghamshire. There are some sites that provide soft sand, but these are not standalone operations. As such, the Plan does not make specific provision for soft sand.
- 5.4 West Sussex and the South Downs are currently undertaking a 'Soft sand review' for their Joint Minerals Local Plan. The review seeks to address the need for soft sand, the strategy for supply and potential sites.
- 5.5 West Berkshire and Kent are preparing new Plans. Hampshire, Surrey and Wiltshire (and Swindon) are currently reviewing or plan to review their Plans. The Central Bedfordshire Plan does not make specific provision for soft sand in their Plan and there is no timetable outlined for a Plan review.
- 5.6 Local Plans must be prepared using best available data. As such, the information provided in the Soft Sand Study should be included as evidence in the preparing and reviewing of relevant Plans. Table 2 sets out the status of relevant Mineral Local Plans.

⁹ National Planning Policy Guidance Minerals (2014): paragraph 60
<https://www.gov.uk/guidance/minerals#planning-for-aggregate-minerals>

Table 2 – Mineral Local Plan Status

Planning Authority	Plan Status	Soft sand provision	Current focus
Central Bedfordshire Council	The Minerals and Waste Local Plan: Strategic Sites and Policies was adopted in 2014 ¹⁰	Plan does not provide for soft sand separately.	2017 LAA ¹¹ : Landbank being achieved and allocated sites coming forward.
Buckinghamshire County Council	The Minerals and Waste Local Plan 2016-2036 was adopted in 2019 ¹² .	Plan does not provide for soft sand separately.	Became a Unitary - Buckinghamshire Council on 1 st April 2020.
Hampshire County Council	Minerals and Waste Plan adopted in 2013 ¹³ .	0.28mtpa to 2030	Currently undertaking a 2020 Review of the Plan.
Kent County Council	Minerals and Waste Plan adopted in 2016 ¹⁴ .	At least 15.6mt for Plan period and beyond.	Kent Minerals and Waste Local Plan Early Partial Review 2019. Main modification consultation completed.
Oxfordshire County Council	Minerals & Waste Local Plan: Core Strategy was adopted 2017 ¹⁵	0.189mtpa to 2031 / 3.402mt total reserve	Currently preparing the Sites Allocation Plan. Preferred Options completed in 2020.
Surrey County Council	Core Strategy and Primary Aggregates Plan adopted in 2011 ¹⁶ .	24mt of soft sand and concreting aggregates between 2009 and 2026	LDS (2019) ¹⁷ : A review of the conformity of the Surrey Minerals Plan with the NPPF was carried out in 2014. The current anticipated programme for future review (or partial review) and adoption of the Surrey Minerals Plan is: <ul style="list-style-type: none">• Issues and options – Spring 2020• Adoption – Summer 2023

¹⁰ https://www.centralbedfordshire.gov.uk/migrated_images/minerals-waste_tcm3-2120.pdf

¹¹ <https://centralbedfordshire.app.box.com/s/cp6ybsgklt9qoj6wx86iqoan3ug65utv>

¹² <https://www.buckscc.gov.uk/media/4514370/buckinghamshire-minerals-and-waste-local-plan-2016-2036.pdf>

¹³ <https://documents.hants.gov.uk/mineralsandwaste/HampshireMineralsWastePlanADOPTED.pdf>

¹⁴ <file:///C:/Users/envnml/Downloads/Kent%20MWLP%20Adopted%20July%202016.pdf>

¹⁵ <https://www2.oxfordshire.gov.uk/cms/sites/default/files/folders/documents/environmentandplanning/planning/mineralsandwaste/September2017/AdoptedMineralsWasteCoreStrategySept2017.pdf>

¹⁶ https://www.surreycc.gov.uk/_data/assets/pdf_file/0007/81439/Adopted-Core-Strategy-Development-Plan-Document.pdf

¹⁷ https://www.surreycc.gov.uk/_data/assets/pdf_file/0018/185121/2018-12-18-MWDS-2018-FINAL.pdf

West Berkshire Council	Replacement Minerals Local Plan for Berkshire adopted 2001 ¹⁸ Emerging new Minerals and Waste Local Plan.	Adopted Plan does not provide for soft sand separately.	Soft sand could not be reported on separately at Preferred Options stage due to confidentiality issues. LAA (2018) ¹⁹ : Soft sand Landbank – 0.91 years' <i>Local Plan Newsletter (Feb 2020)</i> ²⁰ : Submission version consultation (scheduled Jan-Feb 2020) has been cancelled due to removal of two significant sites at the request of the landowner.
West Sussex County Council/South Downs National Park Authority	Joint Minerals Plan (with SDNPA) adopted in 2018 ²¹ .	No provision for soft sand – to be addressed in Soft sand review.	Proposed Submission ²² (2020) seeks to meet landbank as set out in Local Aggregate Assessment. Therefore, no specific figure but supporting text suggests that landbank is currently 7.4 years, based on 10-year average sales.
Wiltshire Council	Minerals Core Strategy ²³ and Minerals Development Control Policies DPD adopted 2009 ²⁴ . Wiltshire and Swindon Aggregate Minerals Site Allocation Local Plan was adopted in 2013 ²⁵	Adopted Plan does not provide for soft sand separately.	LDS (2018): A review will be undertaken in 2019/20 in co-operation with Swindon Borough Council. If it is considered necessary to programme a review, this will be set out in the next update to the LDS.

¹⁸ <https://www.bracknell-forest.gov.uk/sites/default/files/documents/replacement-minerals-local-plan-for-berkshire-2001.pdf>

¹⁹ <https://info.westberks.gov.uk/CHttpHandler.ashx?id=47201&p=0>

²⁰ <https://info.westberks.gov.uk/CHttpHandler.ashx?id=48523&p=0>

²¹ https://www.westsussex.gov.uk/media/11736/mlp_adoption.pdf

²² https://www.westsussex.gov.uk/media/13867/ssr_ps_reg19.pdf

²³ <http://www.wiltshire.gov.uk/minerals-core-strategy-june-2009.pdf>

²⁴ <http://www.wiltshire.gov.uk/adopted-minerals-development-control-policies-dpd-2009-september.pdf>

²⁵ <http://www.wiltshire.gov.uk/minerals-adopted-sites-local-plan-may-13.pdf>

6. Alternatives

- 6.1 The Soft Sand Study identifies another element of the market; the use of premixed dry mortars or dry silo mortars (DSM). The limited information that was obtained from the house building companies surveyed in the study showed an increasing use of this material. It is possible that an increasing proportion of the 62,000 – 79,000 tonnes per year building sand market for Central and Eastern Berkshire may be sourced from DSM. DSM requires soft sand resources and whilst this is likely to be from UK land-won sources, some resources maybe sourced from elsewhere, including outside of the UK. Presently, estimates on how much this will be the volume of soft sand required for future DSM usage cannot be made. It is also unclear whether the production of this material is at the cost of reserves/resources that would supply Central and Eastern Berkshire, or from in additional locations is unclear.
- 6.2 The 2014 Aggregate Monitoring Survey records marine aggregate as being received in Berkshire from Hampshire and London via rail. Very little marine sand is used in the South East because the industry and wharves are not investing in this material. It is used in South Wales and maybe included to some degree in DSM, as such it could be an option for the longer term. However, it must be questioned whether it can truly be used as a replacement for building sand. Furthermore, whilst neighbouring West Berkshire and Slough have rail depots, there are none within Central and Eastern Berkshire. In conclusion, marine aggregate is not currently considered a viable alternative to land-won soft sand supplies.
- 6.3 Other alternative materials include sharp sand, recycled and secondary aggregates. As previously mentioned, the fine glacial sharp sand in Buckinghamshire is being used as an alternative to soft sand but this supply is limited. Estimates on the utilisation of recycled and secondary aggregate should be treated with caution. Secondary and recycled aggregate do not currently substitute for primary aggregates in structural uses, only in lower specification construction uses, such as the sub-base in roads and car parks. The main use is to provide a fill that substitutes for the lower quality sand and gravel produced within Central and Eastern Berkshire.
- 6.4 The Mineral Products Association undertook aggregate scenarios to determine potential future growth²⁶. The study concluded that recycled and secondary materials are likely to continue to make a significant contribution to supply (30%) but that the figure is not expected to continue to grow significantly.

²⁶ https://mineralproducts.org/documents/MPA_Long_term_aggregates_demand_supply_scenarios_2016-30.pdf

7. Common Ground

- 7.1 The Emerging Central and Eastern Berkshire - Joint Minerals & Waste Plan makes no provision, by way of allocations, for soft sand. However, draft Policy M2 (Safeguarding sand and gravel resources) states that resources will be safeguarded within the Minerals and Waste Safeguarding Area which includes soft sand resources (contained within the Reading Formation).
- 7.2 Draft Policy M4 (Part 4) seeks to facilitate the extraction of any soft sand resources identified in appropriate locations. An appropriate location is one that meets all planning policy requirements of the Plan as a whole.

'Policy M4

Part 4. Proposals for new sites not outlined in Policy M4 (1, 2 and 3) will be supported, in appropriate locations, where:

- a. *They are situated within the Area of Search (as shown on the Policies Map); and*
- b. *They are needed to maintain the landbank; and/or*
- c. *They maximise opportunities provided by existing infrastructure and available mineral resources; or*
- d. *At least one of the following:*
 - i. *The site contains soft sand;*
 - ii. *The resources would otherwise be sterilised; or*
 - iii. *The proposal is for a specific local requirement.'*

- 7.3 In order to maintain a steady and adequate supply of soft sand to Central and Eastern Berkshire Authorities, it will be necessary to monitor current and future supply sources under the Duty to Cooperate obligations. It is intended that this should be used to inform and update this Statement of Common Ground.
- 7.4 Given the lack of viable soft sand resources in the Central and Eastern Berkshire area, the parties agree that there is a need to recognise existing movements and take into consideration the soft sand needs of Central and Eastern Berkshire in their plan-making, as required by the National Planning Policy Framework.
- 7.5 It is recognised that a number of current sources of supply have significant constraints which will impact longer-term provision such as the presence of the South Downs National Park in West Sussex and NE Hampshire and the presence of Areas of Outstanding Natural Beauty in West Berkshire and Surrey.

- 7.6 The South East England Aggregate Working Party – Annual Report 2018 highlights that soft sand sales have increased and there is a healthy regional landbank with a potential headroom at existing quarries of 45%. However, the report also recognises there has been a decline in the replenishment rate which is likely to reflect the presence of the constraints such as those previously outlined.
- 7.7 There is not a commitment by any one party to supply the total soft sand requirement of Central and Eastern Berkshire but for parties to plan positively in order to continue existing supply sources, where sustainable and in compliance with national policy. In the event current supply patterns cannot be maintained alternatives will be explored under the Duty to Cooperate in the preparation of Plans.
- 7.8 As more data on the movement of soft sand becomes available, the parties to this Statement will be reviewed subject to the outcome of Duty to Cooperate discussions.

8. Additional Strategic Matters

- 8.1 A SoCG has also been prepared regarding the strategic movement and supply of Sharp Sand and Gravel to Central and Eastern Berkshire.