BOURNEMOUTH, DORSET & POOLE MINERAL SITES PLAN EXAMINATION

Representations on behalf of M B Wilkes Ltd

John Cowley, Director, Mineral & Resource Planning Associates Ltd

APPENDIX JFC 1

From: *Trevor G Badley <t.g.badley@dorsetcc.gov.uk>*
To: *JOHN COWLEY <jcmarpa@aol.com>*
Subject: *RE: Bournemouth, Dorset and Poole Draft Mineral Sites Plan – splitting the aggregates landbank*
Date: *Thu, 8 Mar 2018 9:28*

John,

Many thanks for your helpful comments. I have seen that paper you wrote for Essex CC, very interesting.

Regards

Trevor

Trevor Badley

Minerals and Waste Planning Policy || Environment and the Economy

Dorset County Council

Tel: 01305 224675 (Internal 710 4675)

E-mail: t.g.badley@dorsetcc.gov.uk
Website: http://www.dorsetforyou.com/minerals-and-waste

From: JOHN COWLEY [mailto:jcmarpa@aol.com]
Sent: 08 March 2018 05:22
To: Trevor G Badley <t.g.badley@dorsetcc.gov.uk>
Cc: dks@dksymes.co.uk; a.duncan@halletec.co.uk; gjenkins@slrconsulting.com; Robert.Westell@raymondbrown.co.uk; steve@quarryplan.co.uk; steve@emerald-development.co.uk; will@alaska.ltd.uk; trevor.poole@nmsb.co.uk; jo.baker@aggregate.com; andy.duncan@hanson.biz; Gary.Staddon@imerys.com; andy.cadell@lafargetarmac.com; js@landandmineral.co.uk; John.Penny@aggregate.com
Subject: Re: Bournemouth, Dorset and Poole Draft Mineral Sites Plan – splitting the aggregates landbank

Hi Trevor

My initial and general comments.

The Poole Formation is dominated by 'sand' grade material with only very minor quantities of 'gravel'.

The Terrace deposits usually contain a more significant proportion of 'gravel' and larger clasts set in a 'sand' matrix, although the proportion of 'gravel' in the Terrace deposits can vary significantly.

Both statements above discount for discussion the potential presence of significant quantities of clay or clay dominated sequences which locally may replace usable aggregate mineral.

In production terms the Poole Formation can produce significant quantities of sand suitable for both (a) concreting sand (to BS EN 12620 'fine aggregate') and (b) mortar sand (to BS EN 13139) but only minor quantities of (c) gravel (to BS EN 12620 'coarse aggregate'). It can also produce asphalt sand and sand for industrial end uses.

It should be noted that there is very little difference between sand suitable for concreting or mortar sand either in the resources in Dorset or in BS EN specifications, such that, depending on demand, either product can be produced from the same in situ resource.

Further while 'dry' screened mortar sand was historically the main source of mortar sand, that position has changed and washed sand now predominates in mortar. This is mainly because of the dominance of factory mixed mortar which requires a consistent raw material. I do not have an up to date figure but I believe roughly 80% of mortar across GB is now delivered to sites (mainly in silos) as a 'factory mixed' product using washed sand (from both bedrock and terrace deposits). The remaining mortar sand may be either dry screened or washed to produce mortar for particular end uses.

There is not therefore a specific landbank link ("distinct and separate market") between Poole Formation and a specific end use. It is true that some parts of the Poole Formation are too fine for concreting sand, as are some of the other Tertiary sands, but that is not true for the whole outcrop and blending may enable that fine sand to be incorporated into concrete sand.

In production terms the Terrace deposits can again produce all three materials, but typically a greater proportion of gravel (BS EN 12620 'coarse aggregate'). In effect, all the gravel in Dorset comes from Terrace deposits.

So, in relation to the landbank point, the view of the MPA is correct in relation to the general point that both deposits can supply the same range of aggregate materials to the same end use market and that there is no relevant difference (other than proportion in the type or quality of aggregate materials supplied by the two formations that would justify a split in the landbank.

And to that extent the first bullet point ('geological differences')is not relevant because, for example, concreting sand to BS EN 12620 'fine aggregate' can be produced (as can mortar sand and gravel) in Dorset from both sources and as such sand performs adequately regardless of its source, its origin or geological differences are not a consideration. Further a wide range of sources from many geological formations (bedrock as well as recent), including China Clay sand waste, are used in adjoining counties to produce gravel, or concreting sand or mortar sand.

However, as noted above, the proportions of each type from each deposit in Dorset can be fundamentally different, as is the total yield, due to the greater thickness of the bedrock Poole Formation and the dominance of sand grade mineral in that Formation.

This is not an uncommon picture across other parts of the UK where both a bedrock sand and terrace sand and gravels are worked to produce the various types of aggregate and where in the majority of situations a single combined landbank figure is used.

However, while both formations can produce the same aggregate products, there are significant differences in terms of the production and markets for those products. Production of gravel in Dorset has over the last 50 plus years always been around

25%-35% of total sand and gravel production. The remaining 65%-75% has been of sand.

This is roughly the reverse of the situation of sales for these minerals for GB where about 35% is of sand and 65% of gravel.

This difference reflects the yield within the Poole Formation but that is also a reflection of the demand on that material and external sales of sand to other areas whereas most gravel is consumed within Dorset or just over the borders. Dorset sand has always gone to the greater Bristol area and at different times to more distant locations (South Wales, London, South East other than Hampshire, Channel Islands, etc). So Dorset sand is of regional market significance whereas Dorset gravel is mainly of local market significance.

So, there are distinct market differences by product, and this is reflected in greater potential of the Poole Formation to meet the greater/external demand/sales of sand as opposed to gravel.

And in that respect the representations received do identify a potential problem with the sites identified in the Sites Plan. I haven't worked out the detail but most of the sites are in the Terrace deposits and the potential reserves which would be released probably would not match demand and sales proportions of sand or gravel as noted above. The future reserves coming forward in the identified sites may not therefore meet the marke call on Dorset minerals and could under provide sand.

Given that this sand meets a regional demand often in areas with no or limited sand resources then that could lead to a shortfall in supply to those areas and/or a less sustainable supply situation, implying that the Sites Plan provisions are unsound (as suggested in the representations).

The Plan does have a possible fall back through the Areas of Search. That said I have already noted that some Areas of Search appear to be over marginal deposits (or even non-mineral land) and hardly help. Further they also seem to be mainly on terrace deposits. There are other issues with the AoS, but I do not consider that now.

Monitoring through AS2 can really only play catch-up and is bound to be subject to delay and therefore not really a viable solution.

There is therefore a mismatch between current demand and proposed reserves in the Sites Plan which may need to be addressed in modifications to the Sites Plan perhaps via a more relevant AoS policy.

In addition, it could be said that the Sites Plan does not describe the call on sand adequately. This could be addressed in modifications.

Without such modifications there may be a risk that the Plan is unsound.

To conclude: The differences between the Formations does not justify different landbanks. The spatial market difference also does not justify different landbanks (ever

if did it would prove impossible to actually differentiate between products by Formations), but it does require that the provision of future supplies in the Plan reflect the actual demand on Dorset sand. That demand on sand is perhaps not currently provided for in the Plan with the risk that the Plan is unsound.

I would add that a review I undertook of landbanks in areas with two sources (bedrock and superficials) for sand and gravel noted that most MPAs had considered but rejected splitting the landbank by formation or product.

Regards

John

-----Original Message-----
From: Trevor G Badley <t.g.badley@dorsetcc.gov.uk>
To: Trevor G Badley <t.g.badley@dorsetcc.gov.uk>
CC: dks <dks@dksymes.co.uk>; a.duncan <a.duncan@halletec.co.uk>; JOHN COWLEY (jcmarpa@aol.com) <jcmarpa@aol.com>; 'Graham Jenkins' <gjenkins@slrconsulting.com>; 'Robert Westell' <Robert.Westell@raymondbrown.co.uk>; steve <steve@quarryplan.co.uk>; 'steve@emerald-development.co.uk' <steve@emerald-development.co.uk>; will <will@alaska.ltd.uk>; trevor.poole <trevor.poole@nmsb.co.uk>; jo.baker <jo.baker@aggregate.com>; 'andy.duncan@hanson.biz' <andy.duncan@hanson.biz>; 'Gary Staddon (Gary.Staddon@imerys.com)' <Gary.Staddon@imerys.com>; andy.cadell <andy.cadell@lafargetarmac.com>; 'js@landandmineral.co.uk' <js@landandmineral.co.uk>; John.Penny <John.Penny@aggregate.com>
Sent: Tue, 27 Feb 2018 9:59
Subject: Bournemouth, Dorset and Poole Draft Mineral Sites Plan – splitting the aggregates landbank

Good morning,

I am writing to you all as an aggregates quarry operators or agents, seeking your input on an issue that has arisen following representations made on the emerging Bournemouth, Dorset and Poole Draft Mineral Sites Plan (DMSP).

The DMSP has recently finished its Pre-Submission Consultation, but the issue I am writing about was originally raised back in 2015. It relates to the aggregate landbank, provision for adequate reserves through proposed sand and gravel site allocations in the Draft Mineral Sites Plan and the issue of splitting the landbank to reflect the differences between Poole Formation and River Terrace aggregate.

In a nutshell, representations to the Draft Mineral Sites Plan have been received, arguing that:

- There are geological differences between Poole Formation and River Terrace aggregate;
- The Draft Mineral Sites Plan should (but does not) identify which proposed site allocations produce Poole Formation and which produce River Terrace aggregate;
- The Draft Mineral Sites Plan does not (but should) split the landbank, identifying a separate landbank for River Terrace aggregate and a separate landbank for Poole Formation aggregate;
- In not splitting the landbank, the Draft Mineral Sites Plan fails to meet the requirements of paragraph 145 of the National Planning Policy Framework and instead under-provides for Poole Formation sand and hugely over provides for River Terrace aggregate. It is therefore unsound.

Without going into further detail (which can be supplied if necessary) the argument is that since there is such an over-provision of River Terrace aggregate, then some of the proposed site allocations which would deliver River Terrace aggregate (or at least, primarily River Terrace aggregate) should be dropped from the Draft Mineral Sites Plan

The view of the Mineral Planning Authority is that the final bullet point of paragraph 145 of the National Planning Policy Framework refers to , *'calculating and maintaining separate landbanks for any aggregate materials of a specific type or quality* ***which have a distinct and separate market.'*** The Mineral Planning Authority consider that Poole Formation and River Terrace aggregate, while geologically distinct, do not have distinct and separate markets. It is our understanding that in the construction industry, particle size is of far greater importance in terms how the aggregate is used (i.e. whether as building sand, for asphalt/mortar use or as concreting sand) and Poole Formation and River Terrace aggregate can be used for either building sand or concreting sand – depending on how it is processed, blended (??) and marketed.

Since Poole Formation and River Terrace aggregates do not have clearly defined 'distinct and separate markets', it is our view that it is inappropriate to split the landbank. For this reason, policy AS1 of the 2014 Bournemouth, Dorset and Poole Minerals Strategy does not split the landbank but states 'an adequate and steady supply of locally extracted sand and gravel will be provided by maintaining a landbank of permitted sand and gravel reserves equivalent to at least 7 years' worth of supply over the period to 2028'.

Policy AS1 is the primary policy for the provision of aggregates in Bournemouth, Dorset and Poole. Policy AS2 acknowledges the geological differences between River Terrace and Poole Formation aggregate and undertakes to monitor and maintain a 7 year landbank of each – based on monitoring sites that provide primarily River Terrace or Poole Formation aggregate. It does not split the landbank. In addition, it is acknowledged many aggregate sites in Dorset can (or did) provide both River Terrace and Poole Formation aggregate.

Your comments and views on this issue, and whether my understanding/interpretation is correct, are invited and will be helpful in setting out the Mineral Planning Authority position for the Inspector at the Examination to be held later this year. Thank you for reading this and I will look forward to hearing from you.

Regards

Trevor

Trevor Badley

Minerals and Waste Planning Policy || Environment and the Economy

Dorset County Council

Tel: 01305 224675 (Internal 710 4675)

E-mail: t.g.badley@dorsetcc.gov.uk
Website: http://www.dorsetforyou.com/minerals-and-waste