

Statement of Common Ground on Soft Sand Supply in the South East

Version 4.0: Final for South East MPA Formal Agreement

Date: 11 April 2017

The Parties to this Statement of Common Ground are as follows:

Bracknell Forest Council
Brighton & Hove City Council
Buckinghamshire County Council
East Sussex County Council
Hampshire County Council
Isle of Wight Council
Kent County Council
Medway Council
Milton Keynes Council
New Forest National Park Authority
Oxfordshire County Council
Portsmouth City Council
Reading Borough Council
Royal Borough of Windsor and Maidenhead
Slough Borough Council
South Downs National Park Authority
Southampton City Council
Surrey County Council
West Berkshire Council
West Sussex County Council
Wokingham Borough Council

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1 Introduction

1.1 The minerals planning authorities of the South East of England comprise the following authorities:

- Bracknell Forest Council
- Brighton & Hove City Council
- Buckinghamshire County Council
- East Sussex County Council
- Hampshire County Council
- Isle of Wight Council
- Kent County Council
- Medway Council
- Milton Keynes Council
- New Forest National Park Authority
- Oxfordshire County Council
- Portsmouth City Council
- Reading Borough Council
- Royal Borough of Windsor and Maidenhead
- Slough Borough Council
- South Downs National Park Authority
- Southampton City Council
- Surrey County Council
- West Berkshire Council
- West Sussex County Council
- Wokingham Borough Council

1.2 These authorities are all members of the South East England Aggregates Working Party (SEEAWP) and each is responsible for planning for the supply of minerals in their areas, through the preparation of minerals local plans. A minerals local plan can cover the area of a single mineral planning authority or a larger area administered by more than one mineral planning authority where they decide to act together to prepare joint plans. Figure 1 shows the location of each of the above authorities within the South East.

Fig. 1 – Location of South East Minerals Planning Authorities

{map to be inserted showing:

- location of all MPAs
- main transport links (railways, ports, Motorways and trunk roads)}

- 1.3 Section 110 of the Localism Act sets out a “duty to cooperate” in relation to planning of sustainable development, under which planning authorities are required to engage constructively, actively, and on an ongoing basis in any process where there are significant cross-boundary issues or impacts. This includes the preparation of development plan documents so far as relating to “strategic matters”, such as the supply of minerals. The Duty to Cooperate therefore applies to the preparation of minerals local plans.
- 1.4 In addition, the National Planning Policy Framework (NPPF) refers to planning authorities having a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to strategic priorities defined in paragraph 156 which includes the provision of minerals. Local planning authorities are required “to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts” (NPPF, Para 181). The ‘tests of soundness’ (NPPF, Para 182) also require planning authorities to work with their neighbours: to be “positively prepared” a plan should seek to meet “unmet requirements from neighbouring authorities where it is reasonable to do so”; and to be “effective” a plan should be “based on effective joint working on cross-boundary strategic priorities”.
- 1.5 Soft sand is an important aggregate mineral that, for certain end uses, cannot be substituted by other materials. Soft sand is used specifically in building mortar and asphalt by the construction industry.
- 1.6 Soft sand (often known as building sand) has historically been extracted in the south east of England from the following geological formations:
- the Folkestone Formation (the Folkestone Beds) in Kent, Surrey, Hampshire, West Sussex and East Sussex;
 - the Corallian Group, in Oxfordshire; and
 - the ‘Reading Beds’ in the Unitary Authorities that make up the former County of Berkshire.

- 1.7 Soft sand is therefore won in some but not all of the Minerals Planning Authority areas in the South East.
- 1.8 The South East Aggregate Monitoring report for 2014/15 specifically noted that certain authorities (namely West Sussex, West Berkshire and Hampshire) have soft sand supply issues partly because of landscape constraints. The Report also notes how the location of the soft sand resources within protected landscapes might make it increasingly difficult to find reserves in certain areas and thereby maintain land-won supplies at historic levels.

2. **Purpose**

- 2.1 The purpose of this Statement of Common Ground is to underpin effective cooperation and collaboration between the minerals planning authorities of the South East of England in addressing the strategic cross-boundary matter of soft sand supply.
- 2.2 It sets out matters of agreement, reflecting the spirit of co-operation between the Parties to the Statement of Common Ground. It is, however, not intended to be legally binding or to create legal rights.

3. **Parties**

- 3.1 The Statement is agreed by the following Councils (*herein referred to as the Parties*): *(to be completed as agreements are confirmed)*.

*Bracknell Forest Council
Brighton & Hove City Council
Buckinghamshire County Council
East Sussex County Council
Hampshire County Council
Isle of Wight Council
Kent County Council
Medway Council*

*Milton Keynes Council
New Forest National Park Authority
Oxfordshire County Council
Portsmouth City Council
Reading Borough Council
Royal Borough of Windsor and Maidenhead
Slough Borough Council
South Downs National Park Authority
Southampton City Council
Surrey County Council
West Berkshire Council
West Sussex County Council
Wokingham Borough Council*

4. Aims

4.1 This Statement has the following broad aims:

- To ensure that planned provision for the supply of soft sand in the South East of England is co-ordinated, as far as is possible, whilst recognising that provision by the mineral industry is based on commercial considerations; and
- to ensure that the approach to planning for the supply of soft sand is consistent between authorities.

5. Limitations

5.1 This document sets out areas/matters relating to the supply of soft sand on which there is full agreement between all the minerals planning authorities of the south east. From time to time detailed matters may arise, between two or more authorities, on which there is not full agreement. For the avoidance of doubt, this SOCG shall not fetter the discretion of any of the Parties in relation to any of its statutory powers and duties, and is not intended to be legally binding.

5.2 Whilst specific local environmental and economic factors will affect the movement of soft sand between authority areas, in principle, there are no restrictions on such movement.

6. **Background**

Properties and Use of Soft Sand

6.1 'Soft sand' is generally fine-grained, where individual grains are smooth and well-rounded imparting a relatively soft texture and free-flowing nature. These properties are different to those associated with sharp sand which is rough, angular, and used predominantly in concrete. Soft sands are commonly deposited in marine environments, where constant movement by the sea results in the rounding, polishing and sorting of the grains. The fine, smooth, characteristics of soft sand lend it to be used in products which need to be easily workable by hand for example mortar and plaster.

6.2 There are a number of British Standards that have been informed by European standards, to ensure consistency across Europe in respect of the use of aggregates for different purposes. One of the key British Standards, in respect of soft sand, is BS13139, which stipulates criteria and limitations of sand used in masonry mortar, plastering mortar, rendering mortar, floor/screed, special bedding materials, repair mortars and grouts. The National House Building Council (NHBC) specification for roofing mortar is a 1:3 cement: sand (with plasticiser) mix. The sand is based on sharp sand with soft sand added to achieve workability. The proportion of sharp sand should not be less than one-third of the total sand content.

Use of marine won sand in mortar blends

6.3 Marine sands have mechanical, chemical and physical properties, identical to high quality land-based sands, therefore the end uses are no different. In England, marine sands are widely used in the production of:

- Mortar for bricklaying and blockmaking
- Screeds
- External renders
- Internal rendering
- Masonry blocks
- Paving blocks

- 6.4 Marine won sand with properties akin to land-won soft sand is currently sourced from the Bristol Channel as there are extensive deposits of mobile sand across the upper Severn Estuary. The resource has been exploited as the terrestrial alternatives in South Wales are constrained and the depositional environment favours finer sand resources to be available.
- 6.5 Research¹ carried out by the Crown Estate shows the extent of the potential sand and gravel resource in the English Channel and Thames Estuary. The report shows that there are likely to be areas of fine sand within the area, but that the 'economic potential of individual sites can only be proved by a detailed evaluation programme'.
- 6.6 According to BMAPA, marine deposits off the coast of the Netherlands are dominated by fine to medium sand. The UK exports some coarse sand and gravel to the Netherlands and it is possible that this fine to medium sand could be imported into the UK.
- 6.7 Important considerations include:
- Customer product acceptance (ability to meet colour and grading expectations);
 - logistics of onshore handling and/or processing;
 - retention of fine sands during dredging operations;
 - wharf and fleet capacity.

However, increasingly constrained land-won opportunities for supply soft sand may well provide a prompt for further investigation into these matters in the south-east.

Soft Sand Geology in the South East

- 6.8 In the South East of England the primary source of soft sand is the Folkestone Formation of the Lower Greensand Group. The Folkestone Formation extends from north west of Lewes in East Sussex, across West Sussex and into Hampshire to Petersfield, where it swings around to the north east and then continues east across Surrey and Kent, meeting the coast at Folkestone. A significant proportion of this soft sand resource is located within and adjacent to the following protected areas:
- South Downs National Park (SDNP)

¹ The Mineral Resources of the English Channel and Thames Estuary (BGS) (2013)

- Surrey Hills Area of Outstanding Natural Beauty
- Kent Downs Area of Outstanding Natural Beauty

6.9 The Folkestone Formation has traditionally been regarded as a source of 'soft sand' used for construction purposes, and has also been a source of specialist 'silica sand', especially in Surrey and Kent.

6.10 In Oxfordshire, soft sand resources are limited to the Corallian Ridge area between Oxford and Faringdon. In West Berkshire soft sand is associated with the 'Reading Beds' formation and historically the majority of the soft sand deposits that have been worked have been those found in the North Wessex Downs Area of Outstanding Natural Beauty, in particular an outcrop found around Junction 13 of the M4. The Reading Beds extend into central and eastern Berkshire although there has been no excavations from the formation in this area since the early part of the century.

6.11 Other constraints to the extraction of land won soft sand resources include European designations such as Special Protection Areas (SPAs), Special Areas of Conservation (SACs), and nationally designated Sites of Special Scientific Interest (SSSIs) and Ancient Woodland. Urban areas and major infrastructure are also a constraint (although prior extraction during redevelopment is a possibility).

6.12 It should be noted that there can be a lack of clarity in geology between soft sand and silica sand as they occur in the ground. This may have implications for meeting soft sand supply requirements as its potential to be used as silica sand in higher value applications is increasingly being considered by the industry. Silica sand is similar but with fewer impurities (a silica content of 95% is classed as silica sand), generally lighter in colour and more commonly used for specialist end-uses, for example glass manufacture, sports pitches, golf courses and equestrian uses.

Figure 2 – The soft sand resource in the South East

Map to be prepared and inserted. This will show the soft sand resource (there is a BGS layer) and permitted and allocated sites but not sizes and movements. The map will show road and rail network, wharves and main towns as well as AONBs and NPs, to provide spatial context.

Land-won Soft Sand Supply Levels

- 6.13 The overall trend in total land-won sand and gravel sales in south east England is of year on year general decline – in 2015 sales were 40% less than 2005. Over the same period, sales of marine sand and gravel have increased. Compared to marine-won, sales of land-won sand and gravel have decreased as a proportion - in 2015 sales of land-won sand and gravel were 46% of all primary (land-won and marine) sand and gravel sales compared with 62% in 2005. Most of the fall in land-won sales over this period is accounted for by sharp sand and gravel; sales of soft sand fell by only 7%. The trend is therefore of increasing sales of marine dredged aggregates contributing an increasing proportion of total aggregate sales.
- 6.14 In 2014 sales of land-won sand and gravel (including soft sand) from the region’s quarries were 5.9 million tonnes and the level of sales in 2015 remained at this level. There has been a general decline in these sales over the last decade and the soft sand element of sand and gravel has increased as a proportion. In 2005 the sales of soft sand as a proportion of total sand and gravel sales was 18% but this had increased to 28% by 2015.
- 6.15 There has been a decrease in permitted reserves of land-won sand and gravel - generally new planning permissions have not kept pace with extraction rates, so there has been historic depletion of reserves. However, this trend has been reversed in the last two years and the total sand and gravel landbank for the region at the end of 2015 was 9.5 years. In 2015 the mineral planning authorities all had combined (i.e. combining sharp sand and gravel and soft sand together) landbanks of more than 7 years. Soft sand accounted for 33% of the total south east landbank of sand and gravel at the end of 2015.
- 6.16 In 2015 there were 41 wharves in the region. Sales of marine dredged aggregate are over six million tonnes from landing at the region’s wharves, which means marine dredged material contributes more to the region’s sales than land won sand and gravel. The marine dredged aggregate landed in the South East is currently generally sharp sand

and gravel, and is currently not known to be substituting for land-won soft sand to any significant extent. However it is understood that marine won sand is being used for the manufacture of mortar used in the South East.

Table 1: South East Soft Sand Reserves and Sales (thousand tonnes), 2015

(c = confidential)

Area	Reserves at start of year	Sales during year	Permissions during year	Reserves at end of year
Berkshire Unitaries	c	c	0	c
Bucks/Milton Keynes	c	c	0	C
East Sussex	0	0	0	120
Hampshire	1,307	123	0	1,516
Isle of Wight	255	12	0	202
Kent/Medway	7,994	480	1,500	8,177
Oxfordshire	1,782	233	0	1,594
Surrey	8,073	495	770	8,170
West Sussex	3,009	188	84	2,752
Total		1,632	2,354	23,110

Source: South East Aggregates Monitoring Report 2014-15

Table 2: Sales of soft sand 2005-2015

Year	Sales (thousand tonnes)	% change on previous year
2005	1,749	-33
2006	1,776	2
2007	1,906	7
2008	2,268	19
2009	1,38	-39
2010	1,676	21
2011	1,524	-9
2012	1,593	5
2013	1,560	-2
2014	1,506	-1
2015	1,632	6
Percentage change 2005 - 2015		-7
Last 10 year average	1,683	
Last 3 year average	1,566	

Source: South East Aggregates Monitoring Report 2014-15

6.17 The key findings of the South East Aggregates Monitoring Report 2014-15 (SEEAWP 16/03) concerning soft sand are as follows:

- **Sales** of land-won primary aggregates, especially sand and gravel (including soft sand), in the south east of England have declined significantly in the last decade.
- **Reserves** of all land-won sand and gravel have also declined but not as sharply as sales. The regional sand and gravel landbank is well above 7 years.

- Based on sales in 2015, the **landbank** for soft sand is nearly 14 years. This is concentrated in Hampshire, West Sussex, Kent, Oxfordshire and Surrey. This contrasts with sharp sand and gravel where reserves are more evenly spread.
- Locally, there is stress in the supply system in the medium term as soft sand reserves are not evenly distributed, with some areas likely to be depleted by 2030. The location of the soft sand resource within protected landscapes is making it increasingly difficult to find reserves in certain areas in order to maintain land-won supplies at historic levels.

Transportation of Soft Sand

6.18 An Aggregate Minerals Survey for England and Wales carried out by the British Geological Survey (BGS) on behalf of the Department of Communities and Local Government was undertaken in 2015 to collect 2014 data (AM14).

6.19 The England and Wales survey includes data on the supply of aggregate between regions and 'sub regions' (mpa), the mode of transport used and provides information on consumption as well as sales and reserves.

6.20 The radius of economic transportation of sand and gravel is often stated to be generally less than 30 miles. However, soft sand in the South East does, in many instances, travel over greater distances. There would appear to be a number of reasons:

- For national operators, the aggregates are transported to the nearest mortar or asphalt plant, which can often be up to 45 miles (or further) where the end product is made, before onward travel to the end user, One use of soft sand is to mix it with marine aggregates to replace the finer material washed during dredging and to assist in meeting the chloride content required for concreting purposes. In these instances, the soft sand travels to the nearest wharves which may be up to 45 miles distant (or further).
- For the smaller operators, the sand is often used more locally, but manufactured products (such as roof tiles) will again travel up to 45 miles for longer term, larger demand contracts.

Relevant National Policy affecting the supply of soft sand

- 6.21 National planning policy requires MPAs to plan for a steady and adequate supply of aggregates, and to make provision for the maintenance of landbanks for sand and gravel of at least seven years. National planning policy also requires MPAs to prepare an annual Local Aggregate Assessment based on a rolling average of 10 years sales data and other relevant local information, and an assessment of all supply options. National planning guidance says that other relevant local information may include levels of planned construction and housebuilding.
- 6.22 National policy also states that local authorities should calculate and maintain separate landbanks for aggregate minerals of a specific type or quality which have a distinct and separate market.
- 6.23 By virtue of its scale, character and nature, minerals development has the potential to have a serious adverse impact upon the natural beauty, wildlife, cultural heritage and recreational opportunities provided by National Parks and Areas of Outstanding Natural Beauty and is therefore considered as 'major development', requiring the demonstration of 'exceptional circumstances' (Paragraph 116 of the NPPF). Further protection of National Parks and AONBs is provided by paragraph 144 which states that as far as is practical, MPAs should "provide for the maintenance of landbanks of non-energy minerals from outside National Parks...Areas of Outstanding Natural Beauty and World Heritage sites, Scheduled Monuments and Conservation Areas".
- 6.24 Paragraph 115 of the NPPF provides further policy on development in National Parks and AONBs as follows:
"Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads."
- 6.25 Paragraph 144 of the NPPF confirms that as far as is practical, MPAs should provide for the maintenance of non-energy mineral landbanks from outside National Parks, the Broads, Areas of Outstanding Natural Beauty, World Heritage sites, Scheduled Ancient Monuments and Conservation areas.

7. Agreement between the Parties

General considerations

- 7.1 The Parties recognise that private sector businesses (and, therefore, commercial considerations) will determine whether proposals for the extraction of soft sand come forward for consideration and, in the event that planning permission is granted, are ultimately developed.
- 7.2 The Parties will work together in the consideration of how to plan for the implications arising from the supply of soft sand to any other authority areas that are not party to this Statement (including MPAs beyond the South East).
- 7.3 The Parties agree that the challenge to be addressed is to supply soft sand from within the South East in a manner which is most sustainable, taking the impacts on the South East as a whole into account as well as on an individual authority basis.
- 7.4 Notwithstanding the above, the Parties agree to continue to positively plan to meet the demand for soft sand in their areas. This includes making appropriate provision in their local plans, including, as required, the allocation of sites for new quarries and transport infrastructure (wharves and railheads).

Consistency with national policy

- 7.5 The parties recognise that their Plans must be consistent with the NPPF. The parties also recognise that, due to the location of the soft sand resource in the south east, there is a tension in the NPPF, whereby there is an expectation that MPAs plan for a steady and adequate supply of aggregate and, at the same time, protect National Parks and Areas of Outstanding Natural Beauty.
- 7.6 In particular, as set out above, National Parks and AONBs are given particular protection from the impacts of development. Proposals for minerals development in National Parks and AONB's will therefore be rigorously examined by the relevant MPA and will only be permitted if it can be demonstrated that there are exceptional circumstances and it is in the public interest including that the need for the development outweighs any negative impact (the major

development test). The Parties will also apply this 'major development test' as part of their consideration of whether sites should be allocated in Local Plans. In this regard, the parties agree that exceptional circumstances, under which the working of soft sand in the AONBs and National Parks would take place, may not exist in the south east. In part this is because there may be sufficient opportunities for meeting the demand for soft sand from alternative sources located beyond these protected areas.

Distribution of soft sand resources

- 7.7 The Parties recognise that the soft sand resource is not evenly distributed across the South East and so the onus for ensuring sufficient land-won supplies lies with those MPAs whose areas are underlain by this mineral.
- 7.8 It is recognised that provision for unmet requirements from other authority areas should be included in a minerals local plan where this is reasonable and consistent with achieving sustainable development, in line with paragraph 182 of the NPPF. Any additional provision for the supply of soft sand to accommodate the specific needs of other authorities, that cannot supply soft sand, will be a matter for discussion and agreement between the authorities concerned under the Duty to Co-operate and is outside the terms of this Statement of Common Ground.

Demand for soft sand

- 7.9 The parties consider it likely that the demand for soft sand in the South East will, in future, increasingly need to be met by imports into the area and from marine won sources.

Transportation of soft sand

- 7.10 The parties recognise that, certain South East mineral planning authorities (in particular West Sussex, Hampshire, Isle of Wight and West Berkshire) are facing greater challenges than other authorities in identifying opportunities for soft sand extraction in areas beyond the National Parks and AONBs. In light of this it is likely that the transport of land won soft sand from less constrained areas to more constrained ones will continue and is likely to increase. This may mean that the overall length of journeys associated with the supply of soft sand in the South East will increase. The Parties recognise that, in principle, there are no restrictions on the movement of soft sand between authority areas². The environmental impacts of transport associated with soft sand supply will be factored into decisions on proposals for

² N.B. The separation of the Isle of Wight from the mainland currently prohibits movements of land-won aggregates to or from the Island which, as a result, operates in relative isolation.

soft sand extraction.

Future supply

- 7.11 The parties will plan, where appropriate, and on the basis of sub-regional markets, for the supply of soft sand separately from sharp sand and gravel due to its distinct properties and end-uses.
- 7.12 Due to the depletion of resources in unconstrained areas, some authorities may not be able to plan for the supply of soft sand from indigenous primary land won sources at the levels based on demand calculations set out within LAAs.
- 7.13 The quantum of soft sand to be planned for will be derived from the LAA which should be based on the average of 10 year sales and other relevant local information including construction activity and constraints on supply. The parties recognise that there is no direct correlation between construction activity and land won soft sand supply,

Soft sand and silica sand

- 7.14 The parties note that silica sand, which is a mineral of national importance, and soft sand are found within the same geological formations. Where relevant, the parties will include policies in plans and make decisions on proposals which aim to discourage the use of high quality silica sand as an aggregate in construction applications.

Safeguarding and Prior Extraction

- 7.15 In light of its relative importance and demand for the mineral, the parties agree to safeguard the entire soft sand resource in their Minerals Local Plans. Similarly, policies will be included for the prior extraction of the mineral in advance of surface development that would otherwise sterilise the mineral.

Site Allocation within Protected Areas

- 7.16 The parties agree that, consistent with national policy (NPPF paras 116 and 144), the general approach³ will be to not allocate sites, or areas of search, for soft sand extraction within National Parks and Areas of Outstanding Natural Beauty.

³ It is recognised that there will be exceptions and the Isle of Wight is an example where the overriding consideration is the location of a scarce resource and of the 5 sand and gravel quarries currently active on the Island, 4 are within the AONB, in addition 4 of the 6 allocated sand and gravel sites are within the AONB.

Monitoring and Reporting

- 7.17 The parties will monitor sales and reserves of soft sand on an annual basis and report, within their LAAs, on the extent to which a seven year soft sand landbank is being maintained within their areas; and this should be monitored collectively in the annual South East Aggregates Monitoring Report, prepared by the South East Aggregates Working Party (SEEAWP).
- 7.18 The National Coordinating Group should be informed of the position regarding soft sand supplies via the annual South East Aggregates Monitoring Report prepared by SEEAWP.

8. Actions and Activities

- 8.1 The Parties to this statement will continue to share knowledge and information relevant to strategic cross-boundary issues relating to planning for the supply of soft sand including the matters set out in the Agreement in Section 7.
- 8.2 The Parties will seek to ensure that the matters in the statement are reflected in the minerals local plans that they prepare (including, in the case of unitary authorities, any local plans that include minerals policies).
- 8.3 The Parties will take account of the matters in the statement in the consideration of planning applications for soft sand supply.
- 8.4 The Parties will continue to liaise with each other on how soft sand supplies to meet the needs of the South East can be maintained.

9. Liaison

- 9.1 Appropriate officers of each Party to this Statement of Common Ground will liaise formally through meetings of the South East mineral planning authorities, normally held in parallel with the South East Aggregates Working Party (SEEAWP) meetings, which generally take place two or three times a year.

10. **Timescale**

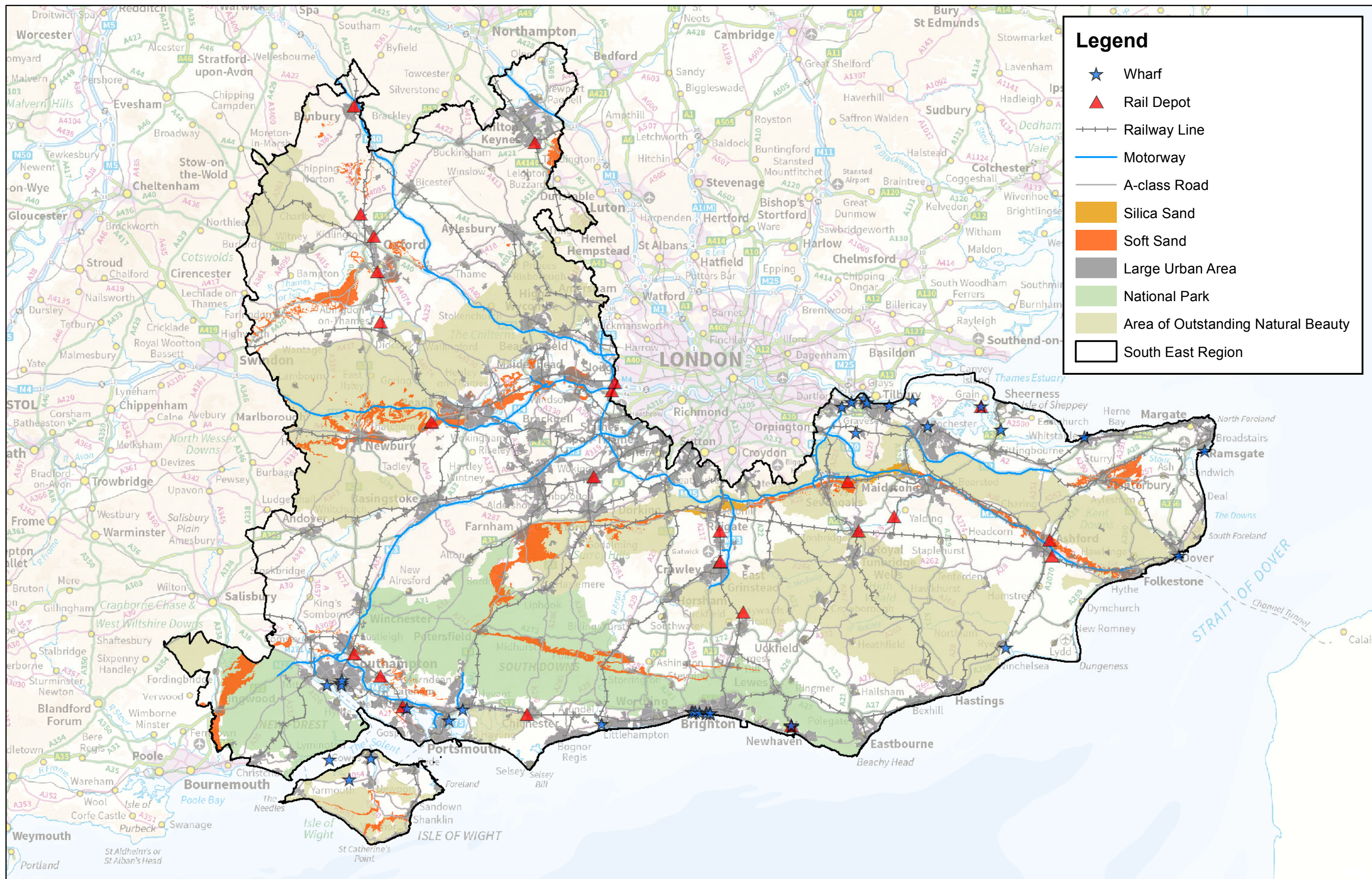
- 10.1 The Statement of Common Ground is for a three-year period from 2017 and will be reviewed and refreshed as appropriate during 2020.
- 10.2 It will be reviewed annually by the Parties to establish how effective it has been and whether any changes are required. SEEAWP will be requested to report the results of the review in the annual South East Aggregate Monitoring Report.

11. **Signatures**

*Bracknell Forest Council
Brighton & Hove City Council
Buckinghamshire County Council
East Sussex County Council
Hampshire County Council
Isle of Wight Council
Kent County Council
Medway Council
Milton Keynes Council
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Oxfordshire County Council
Portsmouth City Council
Reading Borough Council
Royal Borough of Windsor and Maidenhead
Slough Borough Council
South Downs National Park Authority
Southampton City Council
Surrey County Council
West Berkshire Council*

12. References

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- Island Plan: The Isle of Wight Council Core Strategy (including Minerals & Waste) and Development Management Policies DPD adopted March 2012.
- Assessment of the Potential for Mineral Sites on the Island, Site Options Report
- Assessment of the Potential for Mineral Sites on the Island, Site Options Report – Appendices C-F



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The Soft Sand Resource in the South East

1:800,000

