

**Regional Planning and Environment Executive
23rd February 2010**

**Interim Policy Statement – Sub-Regional Apportionment of
Aggregates**

1. Purpose of Report

1.1 The purpose of this report is to:

- (a) Update Members on progress towards developing an Interim Policy Statement related to the sub-regional apportionment of aggregates and
- (b) Provide an emerging draft of the Interim Policy Statement for consideration and comment.

2. Recommendation

2.1 That Members:

- (a) Note the process and timetable for developing Interim Policy Statement related to the sub-regional apportionment of aggregates and
- (b) Consider the emerging sub-regional apportionment options.

3. Background

3.1 On 29th June 2009 the Government issued revised national and regional guidelines for the provision of aggregates for the period 2005-2020. These new guidelines replace the June 2003 guidelines.

3.2 The revised regional guideline total provision for the West Midlands is 370million tonnes of materials to be provided over the next 16 years and comprises the following requirements and assumptions:-

- 165 million tonnes of sand and gravel
- 82 million tonnes of crushed rock
- 100 million tonnes of alternate materials (secondary and recycled aggregates)
- 23 million tonnes of imports, principally from Wales.

3.3 The Guidelines are important because the Regional Planning Body (RPB) and the MPA's need to have regard to them in the preparation and revision of Regional Spatial Strategies (and the new Regional

Strategies) and Local Development Frameworks and the determination of planning applications for minerals development.

4 The Apportionment Process

4.1 At the RPEE meeting on 22 September 2009 Members agreed that:-

(i) Sub-regional apportionment of aggregates provision in the West Midlands be undertaken by the Regional Assembly as requested by Government.

(ii) The West Midlands Regional Aggregates Working Party (WMRAWP) be requested to undertake the required sub-regional apportionment exercise and regional consultation on behalf of the Regional Assembly.

(iii) A request be made to GOWM to extend the deadline for completion of the sub-regional apportionment work to March 2010.

(iv) Independent consultants be commissioned to undertake the Sustainability Appraisal which is required to accompany the sub-regional apportionment.

(v) A request be made to GOWM to vire the additional funding required for the sustainability appraisal of the sub-regional apportionment.

4.2 Subsequent to the RPEE meeting GOWM agreed to extend the deadline for this work until the end of March 2010 and the Assembly commissioned consultants to undertake the Sustainability Appraisal (SA) and the Habitats Regulation Assessment (HRA). However, GOWM declined to provide the additional funding requested by the Assembly.

4.3 The RSS Phase Three Revision Options consultation document issued in June 2009 outlined a number of policy options related to the apportionment of future supplies of construction aggregates. It was clear from the responses received to the consultation that there was real interest in an alternative apportionment exercise based on different methods. The Assembly considered that there would be merit in examining alternatives in more detail. Based on the belief that such work fell outside the remit of the WMRAWP provided by CLG, the Assembly commissioned consultants, Land Use Consultants (LUC), in November 2009 to examine an alternative apportionment options alongside the work of the WMRAWP.

4.4 The technical WMRAWP group considered the WMRA request at its meeting on 15th October 2009 and agreed to develop a series of six scenarios (options) which were reviewed at the WMRAWP meeting on 4th December 2009. These six WMRAWP options which essentially reflect "historical shares" comprised:

- Option 1(a) - Past Trends - 3 Year Average Sales
- Option 1(b) - Past Trends - 5 Year Average Sales
- Option 1(c) - Past Trends - 10 Year Average Sales

- Option 2 - Substitution of Sand and Gravel - with 25% increase in recycled aggregates
 - Option 3(a) - Substitution of 10% Sand and Gravel - with crushed rock
 - Option 3(b) - Substitution of 10% Crushed Rock - with sand and gravel
- 4.5 On behalf of WMRA, LUC developed five options based on various weightings and factors including likely availability of materials, future patterns of development and environmental considerations. The following five “alternative” apportionment options were developed:
- Option A - Supply led – Giving the highest weighting to the location of the resources, and distributing equal weightings to the remaining factors (demand, past sales and constraints)
 - Option B - Growth led – Giving the highest weighting to demand, and distributing equal weighting to the remaining factors
 - Option C - Environment –led – Giving the highest weighting to the amount of resource outside of environmental constraints, and distributing equal weighting to the remaining factors
 - Option D - Equal weighting – where all factors are given equal weighting
 - Option E - Demand and resource – weighted 40% on demand (with a 6:4 ratio for future current demand), 40% on supply (the location of the unsterilized resource) and 10% each for past sales and constraints.
- 4.6 In this initial stage the weightings presented in the five LUC options were deliberately extreme in order to show the differences between the options. However, it was always recognised that subsequently it would be possible to adjust the weightings to make the options less extreme and more relevant to the situation in the West Midlands.
- 4.7 The Assembly Board, at its meeting on 15th January 2010, recognised that the sub-regional apportionment required difficult decisions and noted the strong opinions expressed by Staffordshire that the current apportionment for sand and gravel placed an undue burden on that County area. The Assembly Board noted that technical work on the apportionment options was still in progress, including a technical consultation with the WMRAWP, with a view to the Assembly seeking a common solution by the end of March 2010. The RSS Coordination Group, at its meeting on 3rd February, agreed that the way forward would be to present Members of the RPEE and Assembly Board with apportionment options based on both the WMRAWP scenarios and the LUC methodology.

5. Technical Consultation with the WMRAWP

- 5.1 Between 18th December 2009 and 22nd January 2010 the WMRA undertook a technical consultation with WMRAWP members on the eleven options for the sub-regional apportionment of aggregates.

- 5.2 A summary of WMRAWP responses to the technical consultation, prepared by the WMRAWP technical secretariat, is attached as Appendix A.
- 5.3 In addition to responses from the WMRAWP, the Regional Assembly also received unsolicited comments from 145 individuals and organisations not represented on the WMRAWP. A summary of non-RAWP responses is attached for information only as Appendix B.
- 5.4 The technical consultation with WMRAWP did not produce a consensus view on a preferred sub-regional apportionment option. There was a polarisation of views, with particularly marked differences of opinion between Staffordshire and Stoke who favoured an option based on the LUC methodology and the other MPA's and industry representatives who favoured an option based on past sales trends.
- 5.5 At its meeting on 9th February 2010 the majority of WMRAWP members agreed (Staffordshire and Stoke on Trent strongly disagreed) to recommend that the Regional Assembly consider Option 1c (10 year average) as an option for determining the apportionment for both sand and gravel and crushed rock.
- 5.6 The WMRAWP's reasons for choosing option 1c was that it provided a better indication of trends over time and would iron out any temporary fluctuations in sales figures. The WMRAWP also considered an option based on past trends to be a tried and tested method, and led to an apportionment that related well to existing supply patterns in the region and was supported by the industry representatives. WMRAWP agreed that for the purposes of carrying out the apportionment the 10 year period for calculating the average would be 1998 -2007.
- 5.7 The WMRAWP agreed that if the Assembly was minded to use an alternative apportionment methodology based on that developed by LUC, then the two new options presented to the WMRAWP on 9th February 2010 (Option F and a refined Option F (with Phasing)) should be subject to a further limited consultation with WMRAWP members from 17th -26th February 2010.
- 5.8 The WMRAWP considered that Option F (with a considerable weight on past sales) and a refined Option F (which provided the opportunity to introduce a phased change in apportionment methodology from solely past sales to one based mostly on past sales but introducing other factors such as demand, location of resource and environmental constraints) had considerable merits and should be in clear preference to options A-E which should now be dispensed with. (see enclosed WMRAWP letter –Appendix C)

6. Options for the Sub-Regional Apportionment of Aggregates

- 6.1 Following the 15th January Assembly Board meeting Members recommended that the preferred way forward would be to present RPEE and the Assembly Board (on 17th March) with apportionment options based on the WMRAWP scenarios and the LUC methodology.
- 6.2 WMRAWP have recommended that the Assembly take forward Option 1c (see 5.5 above) as its preferred option from the WMRAWP options which were consulted upon in January / February. They also recommended that a further round of technical consultation should be undertaken with the WMRAWP, between 17th to 26th February, on the new refined options developed by LUC (see tables 3 - 6) to enable a final view to be taken on an alternative apportionment methodology not based solely on past sales. WMRAWP will meet again on 3rd March so that their views can be considered by the RSS Coordination Group on 8th March and a final recommendation prepared for submission to the Assembly Board.

Option 1c – Past Trends based on 10 year average

- 6.3 The reasons why a majority of WMRAWP members favoured this option were that it provided a better indication of trends over time and would iron out any temporary fluctuations in sales. It was also a tried and tested method, related well to existing supply patterns in the region and is supported by the industry representatives.
- 6.4 However the past sales approach has been described as backward-looking, serving only to reinforce past patterns of planning permissions obtained and takes no account of resource depletion or quality, changing demand resulting from approved spatial development patterns or recent developments in changing building techniques and uses of alternative materials.
- 6.5 Based on the new guideline figures and a distribution derived from an average of the past 10 years sales, the new sub-regional apportionment for sand and gravel and crushed rock would be as follows:

Table 1: Sub-regional apportionments for sand & gravel - 10 Year Average

Sand & Gravel	Average of past 10 years sales	Average as a %	New Draft Local Apportionment (mt)	Current Local Apptnmnt. (mt)
Herefordshire	0.251	2.57	0.27	0.283
Worcestershire	0.836	8.57	0.88	0.871
Shropshire	0.813	8.33	0.86	0.820
Staffordshire	6.353	65.10	6.71	6.602
Warwickshire	0.986	10.10	1.04	1.043
W.Midlands County	0.520	5.33	0.55	0.506
Regional Total	9.76	100	10.31	10.125

Table 2: Sub-regional apportionments for crushed rock - 10 Year Average

Crushed Rock	Average of past 10 years sales	Average as a %	New Draft Local Apportionment (mt)	Current Local Apptnmnt. (mt)
Hereford & Worcester	0.506	12.95	0.66	0.587
Shropshire	2.56	65.5	3.36	2.949
Staffordshire	†	†	†	1.395
Warwickshire	0.84	21.55	1.10	0.88
W.Midlands County	-	-	-	-
Regional Total	3.906	100	5.12	5.812

* West Midlands County apportionment redistributed between the other counties in 2006.

† Staffs figures included in total for Warwickshire for confidentiality reasons

Option F - Refined LUC Options

6.6 The draft LUC report published in December 2009 was criticised by many WMRAWP respondents during the technical consultation because of the:-

- Omissions/weaknesses in the data especially for resources (although it was acknowledged that the consultants had used the best available information at the time)
- The practicality/deliverability of the outputs from Options A- E
- Concerns about the applicability of the methodology to the West Midlands region
- The failure to include other factors such as proximity to market

6.7 At the WMRAWP meeting on 9th February 2010 LUC made a presentation of the work they had done with the support of officers from the MPAs and the Assembly to addresses these criticisms. They presented two further options

- Option F on past sales and
- Refined Option F which provided the opportunity to introduce a phased change in apportionment methodology from past sales to one based on a number of factors

6.8 The tables below outline the sub-regional apportionment for sand and gravel (Table 3) and crushed rock (Table 4) based on Option F.

Table 3. Sand and Gravel apportionments based on Option F (based on 5 year average)

Sand & Gravel	Existing Proportional Share %	Proposed Proportional Share %	Regional totals – based on 165 (mt)	New Draft Local Apportionment (mt)	Current Local Apptnmnt. (mt)
Herefordshire	2.8	4.33	$165 \times 4.33 \div 16$	0.45	0.283
Worcestershire	8.6	9.61	$165 \times 9.61 \div 16$	0.99	0.871
Shropshire	8.1	14.56	$165 \times 14.56 \div 16$	1.50	0.820
Staffordshire	65.2	55.07	$165 \times 55.07 \div 16$	5.68	6.602
Warwickshire	10.3	11.03	$165 \times 11.3 \div 16$	1.14	1.043
W.Midlands County	5	5.39	$165 \times 5.39 \div 16$	0.55	0.506
Regional Total	100	100		10.31	10.125

Table 4 – Crushed rock apportionments based on Option F (based on 5 year average).

Crushed Rock	Existing Proportional Share %	Proposed Proportional Share %	Regional totals – based on 82 (mt)	New Draft Local Apportionment (mt)	Current Local Apptnmnt. (mt)
Hereford	7.30	7.14	$82 \times 7.14 \div 16$	0.366	0.424
Worcester	2.81	3.21	$82 \times 3.21 \div 16$	0.164	0.163
Shropshire	50.75	51.56	$82 \times 51.56 \div 16$	2.642	2.949
Staffordshire	24.01	23.56	$82 \times 23.56 \div 16$	1.208	1.395
Warwickshire	15.14	14.53	$82 \times 14.53 \div 16$	0.745	0.88
W.Midlands County	-	-	-	-	-
Regional Total	100	100	100	5.125	5.812

6.9 The tables below outline the sub-regional apportionment for sand and gravel (Table 5) and crushed rock (Table 6) based on Refined Option F.

Table 5 Sand and Gravel apportionments based on Refined Option F (phasing)

Sand & Gravel	Existing Proportional Share %	Shares % & (mt)	Shares % & (mt)	Shares % & (mt)	Shares % & (mt)
		2005 -2010	2011- 2012	2013-2015	2016 - 2020
Herefordshire	2.8	2.8 0.283	2.35 0.269	3.01 0.344	4.33 0.495
Worcestershire	8.6	8.6 0.871	8.32 0.952	8.75 1.001	9.61 1.100
Shropshire	8.1	8.10 0.820	8.40 0.961	10.46 1.196	14.56 1.666
Staffordshire	65.2	65.20 6.602	65.32 7.473	61.91 7.082	55.07 6.300
Warwickshire	10.3	10.30 1.043	9.88 1.130	10.27 1.174	11.03 1.262
W.Midlands County	5	5.00 0.506	5.72 0.654	5.61 0.642	5.39 0.616
Regional Total	100	10.125			

Table 6 Crushed Rock Apportionments based on refined Option F (phasing)

Crushed Rock	Existing Proportional Share %	Shares % & (mt)	Shares % & (mt)	Shares % & (mt)	Shares % & (mt)
		2005 -2010	2011- 2012	2013-2015	2016 - 2020
Herefordshire	7.30	7.3 0.424	7.30 0.386	7.24 0.384	7.14 0.378
Worcestershire	2.81	2.8 0.163	2.81 0.148	2.94 0.156	3.21 0.170
Shropshire	50.75	50.74 2.249	50.75 2.687	51.02 2.701	51.56 2.729
Staffordshire	24.01	24 1.395	24 1.271	23.86 1.263	23.56 1.247
Warwickshire	15.14	15.14 0.880	15.14 0.802	14.94 0.791	14.53 0.769
W.Midlands County	-	-	-	-	-
Regional Total	100	5.812	5.294	5.294	5.294

7. Next Steps

7.1 RPEE are asked to consider and comment upon, but not approve, the options outlined in tables 1 - 6. In the light of RPEE comments, views emerging from the technical consultation with WMRAWP, and findings from the Sustainability Appraisal and Habitats Regulation

Assessment, a revised paper outlining the apportionment options and a recommended preferred approach will be prepared and considered by the RSS Coordination Group on 8th March. In accordance with the conclusions reached by the RSS Coordination Group, a full report will be prepared for consideration and approval by the Assembly Board at its 17th March meeting.

- 7.2 When the sub-regional apportionment has been completed the apportionment becomes a material consideration in decision making by the Regional Planning Body and MPAs. The regional guideline and apportionment will form the basis of an Interim Planning Statement (emerging draft attached as Appendix D) and is then expected to be incorporated into a future revision of the Regional Strategy (Strategy for the West Midlands) where it can be tested and subjected to full public participation. The apportionment can be subject to further testing through minerals planning documents in the Local Development Framework processes. The emerging Interim Policy Statement will be revised to reflect the Assembly Board's preferred apportionment option.

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West Midlands

Sub-Regional Apportionment of Aggregates

**Summary of Responses
to the Technical Consultation by the West Midlands
Regional Assembly with individual Members of the
West Midlands Regional Aggregates Working Party
(WMRAWP).**

Produced by the WMRAWP Technical Secretary

DRAFT

Introduction

On 29th June 2009 the Government issued revised national and regional guidelines for the provision of aggregates for the period 2005-2020.

The revised regional guidelines indicate a total aggregates provision in the West Midlands of 370 million tonnes to be provided over the next 16 years and comprises the requirements and assumptions outlined below:

Regional Guidelines for Aggregates Provision in West Midlands 2005 – 2020 (million tonnes)

Guidelines for land-won production	Land-won Sand & Gravel	165 mt
	Land-won Crushed Rock	82 mt
Assumptions	Alternative Materials	100 mt
	Net Imports	23 mt

The new guidelines replace the June 2003 guidelines which are incorporated in Policy M2 of the West Midlands Regional Spatial Strategy (WMRSS) which was approved in June 2004.

The revised guideline figures show no change to the draft figures consulted upon by Government in April 2008 and which were used in the WMRSS Phase Three Options consultation which was issued for public consultation by the West Midlands Regional Assembly (WMRA) in summer 2009.

Before the regional guidelines can be used in the preparation of minerals development plans they need to be broken down, as far as possible to Mineral Planning Authority (MPA) areas. This apportionment of the regional guidelines is the responsibility of the WMRA (as the Regional Planning Body), taking into account advice from the West Midlands Regional Aggregates Working Party (WMRAWP).

The Government requested that the apportionment of aggregates be completed and submitted to the Department of Communities and Local Government (DCLG) by the end of December 2009. At the WMRA's request, this deadline was extended for the West Midlands to the end of March 2010.

When the sub-regional apportionment has been completed it becomes a material consideration in decision making by the Regional Planning Body and MPAs. The regional guideline and apportionment will form the basis of an Interim Planning Statement prior to being incorporated into a future revision of the Regional Strategy (Strategy for the West Midlands).

- 1(a) - Past Trends - 3 Year Average Sales
- 1(b) - Past Trends - 5 Year Average Sales
- 1(c) - Past Trends - 10 Year Average Sales
- 2 - Substitution of Sand and Gravel - with 25% increase in recycled aggregates
- 3(a) - Substitution of 10% Sand and Gravel - with crushed rock
- 3(b) - Substitution of 10% Crushed Rock - with sand and gravel

It was recognised that these apportionment options essentially reflect “historical shares” rather than an appraisal of future needs. As a result, WMRA commissioned Land Use Consultants (LUC) to develop “alternative” apportionment options which sought to take account of the likely availability of materials, future patterns of development, environmental and other considerations. The following five “alternative” apportionment options were developed:

- A – Supply-Led
- B - Growth-Led
- C - Environment-Led
- D - Equal Weighting
- E - Demand and Resource

Between 18th December 2009 and 22nd January 2010 the WMRA undertook a technical consultation with the WMRAWP on the eleven options outlined above. Due to the technical nature of the consultation and in order to meet the tight deadlines imposed by DCLG, the technical consultation was limited to WMRAWP representatives only. As MPAs are the only local authorities directly represented on the WMRAWP, the WMRA requested that MPA's consult with their districts on the technical consultation.

The Options were accompanied by an Interim SA and Draft HRA.

The WMRA sought views and evidence related to the following three questions:

- Question 1: Do you think that the Regional Guideline outlined in Table 1 can be met at an acceptable environmental cost?
- Question 2: Please rank (from 1 to 3) which of the Options you think would provide both an adequate and steady supply of materials and the most sustainable supply in the region up to 2020 (1 is the most sustainable, 2 is the second most sustainable and 3 is the third most sustainable)
- Question 3: Are there any Options which you consider would not provide either an adequate or sustainable supply of aggregates to 2020?

This report summarises the responses received to the technical consultation from WMRAWP representatives.

Full copies of responses received to the technical consultation are available on request from the WMRA by emailing wmrss@wmra.gov.uk.

NB. The scoring system in the questionnaire reflects the individual responses from each RAWP member not each sub-region

RAWP Responses to the Questionnaire

Q1. Do you think that the Regional Guideline outlined in Table 1 can be met at an acceptable environmental cost?

Summary of responses to Question (1)

Council/ Organisation	Response
Herefordshire	Y
Telford and Wrekin	Y
Warwickshire	N
Worcestershire	Y
Stoke on Trent	N
Solihull	n/a
Shropshire	n/a
Staffordshire	N
West Midlands Planning and Transportation Sub-Committee	n/a
Walsall MBC	n/a
Government Office for the West Midlands	n/a
Natural England	n/a
Lafarge	Y
Ennstone Johnston	Y
Aggregate Industries	Y
Hanson Aggregates	Y
Tarmac Ltd	Y
Mineral Products Association (MPA).	Y

There were 18 responses from RAWP representatives submitted. The majority of responses (9) concluded that the regional guideline could be met including all the industry responses (6) and 3 Local Authorities (Worcestershire, Telford and Wrekin and Herefordshire). Three respondents concluded that the guideline figure could not be met (Staffordshire, Stoke and Warwickshire) whilst a further 6 respondents concluded that they did not have enough information on which to base their response at the current time.

Reasons given by the respondents, including the industry representatives, for supporting the current guidelines were that generally the region has come close to meeting its apportionment over the last 10 years and there is no change in circumstances which should alter the current supply. It was also noted that the existing RSS policy already provides for this in accordance with the 2003 guidelines until 2016. The new guidelines cover a further period of just 4 years.

Three Local Authorities confirmed they could meet the guideline figure. Telford and Wrekin stated that it was currently disproportionate to the disadvantage of Staffordshire. Herefordshire considered that achieving the Guideline figure might depend on an increase in recycled aggregates and although there appear to be adequate resources only the industry can really judge the value of the resource as it has fuller evaluations of the mineral which are often unavailable to the WMRAWP for reasons of business confidentiality. Worcestershire concluded that the Guidelines could only be met if current levels of cost

were considered acceptable but queried the alternative materials evidence and suggested that there should be no expectation that any shortfall could be made up through higher levels of imports from adjoining regions.

Three responses stated that the Guidelines could not be met (Warwickshire, Staffordshire, and Stoke on Trent). Warwickshire and Staffordshire concluded that the overall guideline figure was not achievable. Warwickshire's view was based on the declining landbank as recorded in the latest WMRAWP Annual Monitoring Reports and from the lack of suitable sites coming through the planning system.

Staffordshire's view supported by Stoke on Trent was that "the overall Guideline figure does not reflect the most sustainable balance of aggregates supply in the region and therefore it should be reduced due to declining need for construction materials, the economic downturn and the increasing concentration of extraction for the region in the county which is creating unacceptable environmental impacts in some areas" It challenged the process, and contended that the established approach to the apportionment of the guidelines be revised or replaced to establish a new pattern of aggregates supply. It concluded that the Regional Assembly should re-run its forecasting model for the West Midlands as it had done in the South East.

However, no other respondents requested this and whilst noting this view, none of the other RAWP respondents supported this view, following a discussion in respect of the issue the WMRAWP decided not to do this at the meeting on 9th February 2010.

Q 2: Please rank (from 1 to 3) which of the Options you think would provide both an adequate and steady supply of materials and the most sustainable supply in the region up to 2020 (1 is the most sustainable, 2 is the second most sustainable and 3 is the third most sustainable).

Council/Organisation	Options										
	1a	1b	1c	2	3a	3b	A	B	C	D	E
Herefordshire		2		1				3			
Telford and Wrekin			3	1	2						
Warwickshire		1	2	3							
Staffordshire				2	3						1
Stoke on Trent				2	3						1
Worcestershire	1	2	3								
Solihull	3	2	1								
Shropshire											
Walsall	3	2	1								
West Midlands Planning and Transportation Sub-Committee	3	2	1								
Government Office for the West Midlands											
Natural England											
Lafarge	3	2	1								
Ennstone Johnston	3	2	1								
Minerals Products Association (MPA)	3	2	1								
Aggregate Industries	3	2	1								
Hanson Aggregates	3	2	1								
Tarmac Ltd	3	2	1								
Total no. of individual replies in support	10	12	12	5	3	0	0	1	0	0	2
TOTAL weighted score	12	25	31	11	4	0	0	1	0	0	6

Weighted Scores: (1, most sustainable = 3 points)
(2, 2nd most sustainable = 2 points)
(3, 3rd most sustainable = 1 point)

Summary of Responses to Question 2

The responses from the initial consultation indicate that the most sustainable apportionment option preferred by the majority of stakeholders would be to adopt Option 1c: Past Trends – 10 Year Average Sales.

2nd most sustainable, Option 1b: Past Trends – 5 year Average Sales.

3rd most sustainable, Option 2: Substitution of Sand and Gravel – with 25% increase in recycled aggregates.

The responses from the consultation indicate that the apportionment option assessed by the majority of the RAWP members to be most sustainable would be one based upon past sales, with the preferred option being Option 1c: Past Trends – 10 Year Average Sales.

The results show the marked difference between the support for the RAWP past sales approach and the LUC options whereby the only support for the latter was from Staffordshire and Stoke on Trent.

The majority of respondents, including those from industry, replied with the same preference for the past sales options 1a – 1c. Past sales proved most appropriate because of the tried and tested methodology, which has proved to be robust over time. It was felt that changes to the current methodology could create shortfalls in supply. The MPA also considered that there was no evidence at the present time to show that any of the other options apart from options 1a, 1b and 1c could meet the need sustainably.

The industry also said that “the pattern of sales reflects the interaction of the occurrence of mineral deposits, demand and proximity /distance” and can be considered to be fair because it serves predominantly local needs. It also operates in a flexible way to allow for local variations in demand to be met.

Whilst some of the local authorities preferred Option 1a because they reflected the most recent trends, there was most support also for 1b and 1c because they provided a better indication of demand and therefore it would iron out any temporary variations in demand.

Option 2 was supported by 5 local authorities but by none of the industry representatives. The option scored well with the Sustainability Appraisal and the Habitats Regulation Review (HRR) but it was stressed by several respondents that the option lacked a credible evidence base. The GOWM pointed out that any increase above the amount given in the national guidelines would need to be supported by strong evidence that is realistic and deliverable. The industry pointed to the fact that the published guidelines show a 50% increase in the contribution from recycled and secondary materials above the level recorded in 2005 based upon an independent study by Capita Symonds.

There was some support for Option 3a from Staffordshire, Stoke on Trent and Wrekin and Telford Council's. Staffordshire commented that it considered there was potential for using the abundant crushed rock resource from a number of non operational quarries which could reduce pressure on sand and gravel production.

Staffordshire and Stoke on Trent supported an option based upon the LUC methodology selecting Option E. They consider the LUC options in general “are forward looking and a more balanced approach with the aim of meeting demand with local supply. Option E was supported in the South East region recently at their EiP. It provides an alternative to the current system by enabling the region to “plan, monitor and manage”. The LUC options take more account of environmental factors such as transportation distances, avoidance of adverse environmental /ecological impacts and ensuring the scale of development in appropriate to the infrastructure available.” One other response from Herefordshire, supported one of the LUC options (option B).

Worcestershire stated that it does not believe that there are any economically viable resources of crushed rock in Worcestershire and that it believes that no apportionment for crushed rock in Worcestershire can be achieved.

Q3 . Are there any Options which you would consider would not provide either an adequate or sustainable supply of aggregates to 2020?

Council/Organisation	Response: Yes (Y) No (N)	Please state which option(s) are NOT adequate
Herefordshire (H)	Y	A-E
Telford and Wrekin (TW)	Y	A-E
Warwickshire (War)	Y	3b, A-E
Staffordshire (Sta)	Y	1a, 1b, 1c, 3b
Stoke on Trent (Sto)	Y	1a, 1b, 1c, 3b
Shropshire (Sh)	Y	A-E
Solihull (So)	Y	A-E
Worcestershire (Wo)	Y	2, 3a, 3b, A-E
Walsall MBC (Wal)	Y	1a, 1b, 2, 3a, 3b, A-E
West Midlands Planning and Transportation Sub-Committee (WM)	Y	1a, 1b, 2, 3a, 3b, A-E
Government Office for the West Midlands (GO)	n/a	n/a
Natural England (NE)	n/a	n/a
Lafarge (L)	n/a	n/a
Aggregate Industries (AI)	Y	n/a
Minerals Product Association (MPA)	Y	n/a
Ennstone Johnston (EJ)	Y	2, 3a,3b, A-E
Hanson Aggregates (HA)	Y	n/a
Tarmac Ltd	Y	n/a

Org	Options											
		1a	1b	1c	2	3a	3b	A	B	C	D	E
He	Y							x	x	x	x	x
TW	Y							x	x	x	x	x
War	Y						x	x	x	x	x	x
Sta	Y	x	x	x			x					
Sto	Y	x	x	x			x					
Sh	Y							x	x	x	x	x
So	Y							x	x	x	x	x
Wo	Y	x	x	x	x	x	x	x	x	x	x	x
Wal	Y											
WM	Y											
GO	N											
NE	N											
L	N											
AI	N											
MPA	N											
HA	N											
EJ	N					x	x	x	x	x	x	x
T	N											
Total		3	3	3	1	2	5	7	7	7	7	7

Summary of Responses to Question 3

Only the local authorities filled in a response to this question. The industry, with the exception of Ennstone Johnston, and other organisations left the section blank, although it is evident from the industry submitted forms that they do not support LUC Options A-E. From those that answered this section the majority of respondents stated that the LUC Options would neither provide either an adequate or sustainable supply of minerals. Staffordshire and Stoke were the exceptions stating the alternative view that the Past Sales Options 1a, 1b and 1c would not provide either an adequate or sustainable supply of minerals. Worcestershire stated that “none of the options put forward would provide an adequate or sustainable supply of crushed rock .“

From the data, therefore, the results are again polarised between Staffordshire and Stoke and those from the other members of the RAWP, including the other local authorities. There were least objections to Option 2. The conclusions for the most part are the reverse of Question 1. Whilst there is not a large amount of data to extrapolate, the general pattern is visible.

Staffordshire and Stoke consider that “Options 1a, 1b and 1c are not flexible and that past figures are not the best way to plan future production, they are based on only one indicator i.e. sales whereas the LUC Options are based on several indicators, that the LUC approach has been accepted by the Inspector for the South East region, that past sales apportionment perpetuates the current unfair distribution of environmental impacts in Staffordshire, that Option 3b is also considered undesirable due to the fact that an increase in sand and gravel production will only make the above factors worse.” It is fair to say that there was no support from other local authorities or from any of the industry for these criticisms of options 1a, 1b or 1c

Many of the comments associated with the LUC options referred particularly to the lack of a robust evidence base, plus the shortcomings of the methodology and the process. It relies on broad assumptions/judgements and it would propose a change from the current pattern which is undeliverable. Some of the members thought that the extreme weightings of the LUC options were not practicable and that the LUC methodology has proved to be more of a paper exercise in examining future potential capacity in the region.

3. General Points about the consultation – Summary by the RAWP Secretariat

Speed of the Process

Many respondents echoed the view of Shropshire Council that the current process was been conducted in too short a time period to generate adequate evidence to support any significant challenge to either the regional target or the traditional (trend based) methodology for making sub-regional apportionments. Shropshire Council also considered that the region should refuse to be ‘bounced’ into setting what could be an unrealistic long term target without having first worked closely with the Mineral Planning Authorities to carry out sufficient research to support an outcome which is most appropriate to the needs of the West Midlands. .

In essence the general feeling appeared to be that the process has been conducted in too short a timescale to give the Regional Assembly time to provide enough evidence to reach a preferred option.

Methodology of LUC work

There was concern that the new methodology was tabled at the WMRAWP meeting without any prior availability to enable a full discussion of it. The industry wanted the issue to be discussed at the following RAWP meeting on February 9th 2010.

It was considered by some that there are too many theoretical assumptions and these are considered to be overly simplistic. Further, one comment suggested that the methodology was heavily based on value judgements and data that are not entirely robust or comprehensive.

Gaps in the evidence base

Resource

The majority of respondents felt that the resource base was of insufficient coverage for the study. There are gaps in the extent, depth and viability of the mineral resource and therefore doubts about the quality of the resource. It appeared that different authorities had different types of data e.g. for worked out sites and there was doubt as to whether this was the most up to date information. GOWM was concerned that some data appeared not to be available across the region and that some data was still not provided by the time of the report publication.

Recycled and Secondary Aggregates

Further work is needed to ensure that there is a better evidence base to define what percentage of recyclable material could be achieved. The current evidence based on fairly old information is weak and open to criticism that the principles of apportioning on this basis could be found to be unsound. This may have to take place outside the context of this particular study.

Crushed Rock

Similarly the substitution approach set out in Options 3a and 3b would require much more research as to what amount of material could be justified. In the short term and for the purpose of this study Options 3a and 3b were given little or no support.

Habitats Regulations Review and Sustainability Appraisal of the Options

Whilst Natural England was pleased to note the implications of the Habitat Regulations being considered at this stage, there were concerns that previous comments made at the options draft screening report stage had not been taken on board.

There were a number of technical omissions which could impact on the eventual findings of the minerals evaluation process.

These included some SAC sites that appeared not to have been included in the report, issues about site sensitivity to different impacts and other technical issues about the protection zones for European designated sites. In addition no account was taken of cross border issues with sites outside the region and there was concern in some quarters that the HRA had gone beyond its remit in preparing a new option. In the light of these issues there is a danger that the HRA might not be credible. Without, at this stage, going in to great detail, it is possible that these issues can be overcome with more work and liaison between the consultants and Natural England.

Concern was expressed in some quarters that the SA had built in objectives to even out the pattern of aggregate distribution across different sub-regions which appears to prejudice the final assessment of the different options.

5. Conclusion:

It was evident from the majority of WMRAWP responses that there were serious issues about the methodology of the LUC study, the evidence base and the amount of time and resources that were available. Generally it was felt that there was inadequate time to carry out a study of this complexity and importance. Many felt that the LUC model was rather too simplistic and whilst possibly fitting the South East model this was not necessarily the best solution for the West Midlands.

Consequently there was a high degree of support for the past sales options 1a 1b and 1c mainly because of the fact that the methodology was tried and tested and has generally had worked well in the past. Given that respondents questioned the deliverability of Options 2, 3a and 3b and the fact that these options could be construed as being contrary to Government guidance, respondents chose Options 1a, 1b and 1c as the only options that would deliver adequate and sustainable future supplies. However it was noted that some local authorities considered that using past sales might not deliver the required apportionment in the future as the most recent trends appear to show that landbanks may be starting to fall from 2008 onwards. The issue is whether the industry has the capacity to deliver future requirements based on the past sales approach or whether one or more of the other options would also be required to reach the figure. If past sales are used as the basis of a future apportionment there was a general feeling that it should be based on the long term sales (i.e. 10 year sales).

There was a large polarisation between the Staffordshire / Stoke comments which supported the LUC options and all the other RAWP responses which mainly supported the past sales options. Some Local Authorities saw Option B as a sustainable option but which would not be deliverable without much greater evidence requiring up to date research work. It was apparent from some responses that LUC could have used a heavily weighted past sales model, which could possibly take some much lower weightings from some of the other options. This might have made the final results more deliverable. However, this may not be acceptable to the industry which responded in very clear terms that only past sales would be viable and that the LUC options are not acceptable.

**Summary of Non-RAWP Responses
to Technical Consultation with WMRAWP**

1 INTRODUCTION

This note summarises responses from individuals and organisations who are not members of the West Midlands Regional Aggregates Working Party (RAWP), termed as non-RAWP responses, to the technical consultation on the West Midlands Sub-regional Apportionment of Aggregates.

1.1 SUMMARY OF NON-RAWP RESPONDEES

At 22nd January, the Regional Assembly had received 145 non-RAWP responses to the consultation. As shown in *Table 1*, over 80% of these came from residents and organisations based in Staffordshire.

Table 1: Number of Responses by Sub-Region:

Sub-Region:	No. of responses:	Percentage
Herefordshire	0	0%
Shropshire	5	3%
Staffordshire	118	81%
Warwickshire	4	3%
West Midlands	12	8%
Worcestershire	0	0%
Outside Region	6	4%
Total	145	100%

Table 2: Number of Responses by Organisation type:

Organisation type:	Number of responses:	Percentage:
Resident	120	83%
Council	7	5%
Voluntary sector / community group	9	6%
Parish Council	4	3%
Governmental	2	<1%
School	2	<1%
Company	1	<1%
Total	145	100%

1.2 SUMMARY OF RESPONSES TO CONSULTATION QUESTIONS

The following summarises responses to the questions contained in the Technical Consultation document, and includes examples of quotes from individual responses.

QUESTION 1: DO YOU THINK THAT THE REGIONAL GUIDELINE OUTLINED IN TABLE 1 [PER TECHNICAL CONSULTATION DOCUMENT] CAN BE MET AT AN ACCEPTABLE ENVIRONMENTAL COST?

Table 3: Responses to Question 1

Sub-Region:	No	Yes
Herefordshire	0	0
Shropshire	3	0
Staffordshire	117	0
Warwickshire	4	0
West Midlands	11	0
Worcestershire	0	0
Outside Region	5	1
Total	140	1

IF NO, PLEASE PROVIDE EVIDENCE TO SUPPORT YOUR ANSWER:

All but one of the 141 respondees to the question answered “No”. The reasons given include the overall guideline figures being considered too high relative to the amount of sites coming forward from operators and land owners; concerns that basing sub-regional apportionment figures on past sales reinforces past patterns and fails to take account of factors such as changing demand, resource depletion, use of alternative materials and changing building techniques; concerns over the approach of basing figures on past sales volumes when demand has reduced during the economic downturn; the high environmental impact in Staffordshire relative to other parts of the region; and the need to place a greater emphasis on increasing recycled aggregate. Examples of quotes from respondees include the following:

- “The current guidelines rely too much on the contribution made from the sand and gravel resources to be found within Staffordshire. Staffordshire produces a high proportion of the region’s sand and gravel with a severe impact on local communities as well as permanent changes to the landscape. In view of the downturn in construction activity the WMRA should request that the Government re-run the model for forecasting guidelines. Recent evidence in Staffordshire indicates sales of sand and gravel decreased by 17% from 2007 to 2008. Current guidelines [in table 1] do not provide the most sustainable balance of supply of aggregate materials in the West Midlands. Options 2 & 3a should be considered to provide a more sustainable balance of supply”. (*Councillor, Staffordshire County Council*).
- “New quarries in the area would destroy the rural environment of 4 villages: Alrewas, Fradley, Kings Bromley and Orgreave. A much lower percentage of the required sand and gravel should be extracted in Staffordshire than is the case at present. For far too long we have supplied the lions share” (*Alrewas Conservation Group*)
- “The apportionment is totally unfair with Staffordshire contributing far too higher a percentage to the overall total, with the result that Staffordshire is being blighted by this industry and good quality farmland lost forever to water based reinstatement at a time when British farmers are being asked to produce more to feed a growing population. This industry greatly REDUCES the Bio Diversity of an area and rich wildlife habitat is lost to be replaced with often sterile reinstated ponds and lakes”. (*Resident, Walsall*).
- “Aggregate minerals are finite resources and suitable opportunities to extract aggregate minerals are restricted. Therefore, the guidelines should be more challenging and encourage a greater use of recycled waste materials and industrial by products as alternative sources of aggregate materials”. (*Resident, Orgreave Staffordshire*).
- “Evidence from the Warwickshire Minerals Core Strategy Strategic Sites consultation shows that while there may be a resource in Warwickshire, this is not necessarily deliverable in the short to medium term as operators and landowners are not bringing enough new sites forward. If these trends are repeated in other counties there is likely to be a considerable shortage of aggregates in the future which will mean that our regional apportionment is unlikely to be attainable. Consequently, there is

a strong argument to suggest that the overall regional apportionment should be reduced” (4 Councillors in Warwickshire, supporting the Warwickshire County Council RAWP response).

- “in the very recent Inspector’s report...in relation to the review of the sub-regional apportionment in the South East Region, very similar issues are considered...[it stated] “We do not agree with the Minerals Products Association that past sales should continue to be used to apportion the regional guideline figure. This is backward-looking, serves only to reinforce past patterns of planning permissions obtained and takes no account of resource depletion or quality, changing demand resulting from approved spatial development patterns or recent developments in changing building techniques and use of alternative minerals.” (Residents group, Shropshire).

The one consultee who responded ‘Yes’ stated that “as far as Staffordshire was concerned, the underlying geology of the County provides rich areas of sand and gravel with many locations accessible and some locations accessible by rail”. (Aggregates company, Cheshire).

QUESTION 2: PLEASE RANK (FROM 1 TO 3) WHICH OF THE OPTIONS YOU THINK WOULD PROVIDE BOTH AN ADEQUATE AND STEADY SUPPLY OF MATERIALS AND THE MOST SUSTAINABLE SUPPLY IN THE REGION UP TO 2020. PLEASE PROVIDE REASONS (AND WHERE POSSIBLE, EVIDENCE) FOR YOUR CHOICE(S).

As shown in *Figure 1* (below), the ~115 responses from Staffordshire favoured the LUC Options A, B, C, D and E over the other options on the basis that they reflect factors such as supply, demand and environmental issues rather than being based more on past sales patterns. Respondees from Warwickshire favoured Option 1b, 1c and Option 2 (in order of ranking) because these are more likely to be deliverable than Options A to E. Options 1a-c were also favoured by the industry respondent as being based on past sales and therefore more deliverable.

Comments in favour of Options 1a, 1b and 1c

- “The past sales options are still the options with the most robust evidence base at the present time as they are likely to be more deliverable than any of the other options providing a balance between providing an adequate supply of material and sustainable production. Past sales should therefore be the preferred option based on a reduced regional guideline figure....The first choice would be **Option 1b**. We believe that this could be the best option as it provides a good average of the short term and long term trends. Option 1a is considered too short a timescale and it also focuses on a period when the construction boom reached its peak. The ONS AMRI figures show a big fall for 2008 with the current downturn which will no doubt be repeated in 2009 once the figures are available”. (4 Councillors in Warwickshire, supporting the Warwickshire County Council RAWP response).
- “In terms purely of sustainability Option 2 would be the optimum option. However, when balanced against deliverability, given that there is some doubt about the figures involved, Option 1b would be preferable at the present time. Option 1c would be the second choice for the same reasons as 1b because it gives a degree of certainty but over 10 years the data is perhaps slightly less robust”. (4 Councillors in Warwickshire, supporting the Warwickshire County Council RAWP response).
- “The 3 Year Average is too short a period. The 10 year average is likely to produce a more reliable indication but a difficulty is that in the West Midlands the two main producers of crushed rock became exhausted. Thus the 5 Year Average seems to be the most reliable of the three suggested indicators. However, regard could be had to a longer term indicator which would smooth out the variations caused by opening and closing of pits and quarries and by changes in the economic cycle. Perhaps a 30 year indicator would be more reliable although some means of allowing for the exhaustion of major producers would be needed.” (Aggregates company, Cheshire)

Comments in favour of Option 2 and 3a:

- “Option 2 and 3a: represent an important step in the right direction. They recognise the need to conserve aggregate resources and therefore, option 2 highlights ways that Alternatives may be substituted to limit the need to mine land-won aggregate. The case for Alternatives has already been

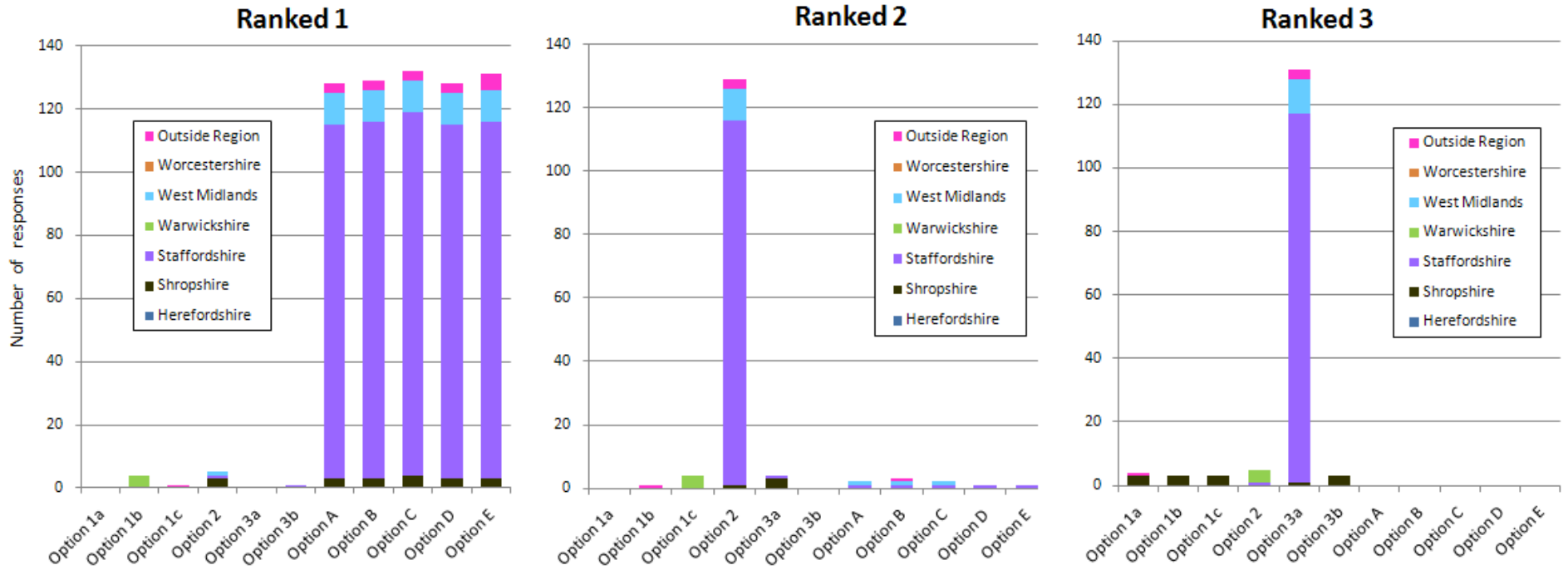
made above. The substitution of crushed rock for sand and gravel (option 3a) is justified because the reserves of crushed rock have not been depleted to the extent to which sand and gravel has”. (*Residents group, Shropshire*).

- “Crushed rock quarries are capable of producing materials that could be used to substitute the fine aggregate derived from sand & gravel resources. This would involve technological changes in the processing of rock and would not apply to all rock resources but given the extent of operational and non operational crushed rock quarries and the extent of reserves associated with these quarries, the region should consider Option 3a to alter the balance of supply and encourage greater use of existing crushed rock resources”. (*Resident, Alrewas, Staffordshire*)

Comments in favour of Options A, B, C, D and E:

- “Options A to E are supported as an alternative method of apportionment to that used previously which was based on past sales trends. There is also merit in option 2 & option 3a on the basis that these provide an opportunity to achieve a more sustainable balance of supply through the guidelines”. (*Councillor, Staffordshire County Council*)
- “Support the methodology used for Options A – E but review weightings...The principal weightings should be for factors reflecting the need to supply local demand with local supply”. (*MP Staffordshire*)
- “The virtue of the A-E alternatives is that they are forward looking and include fundamental factors such as supply availability, likely future demand (as identified by trends in population, planned housing and expected economic growth) as well as environmental constraints. This results in a more scientific and fairer allocation of quarrying throughout the West Midlands region....Importantly, these alternative strategies also reflect in Option E a hybrid measure of “Demand and Resource” which relies at least in part on the older historic sales data. This option, proposed after consultation with the WMRAWP, thereby, permits the mixture of the old approach with the new”. (*Residents group, Shropshire*)
- “It is noted that Option E was recently accepted as a basis for apportionment of the sand & gravel guideline in the south-east region by Inspectors considering the review of sub regional apportionments in that region”. (*Resident, Staffordshire*).

Figure 1 Question 2: Ranking of the Options which would provide both an adequate and steady supply of materials and the most sustainable supply in the region up to 2020 (1 is the most sustainable, 2 is the second most sustainable and 3 is the third most sustainable)



QUESTION 3: ARE THERE ANY OPTIONS WHICH YOU CONSIDER WOULD NOT PROVIDE EITHER AN ADEQUATE OR SUSTAINABLE SUPPLY OF AGGREGATES TO 2020?

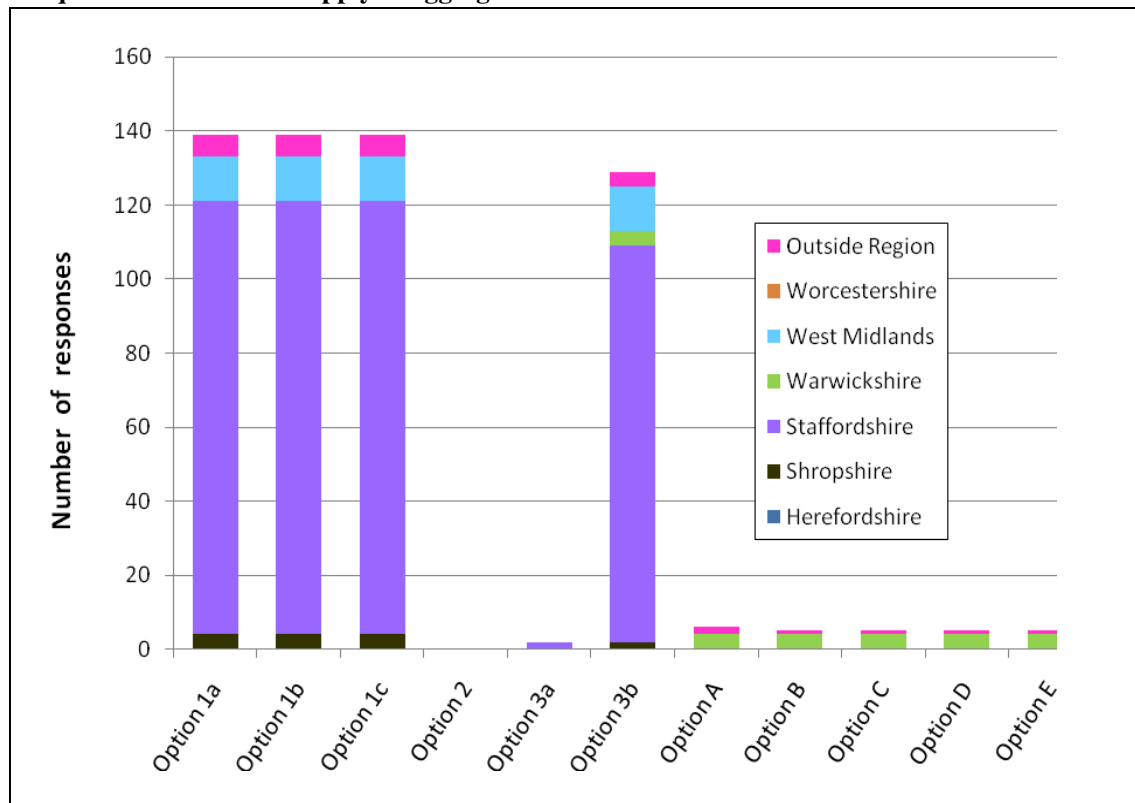
As shown in *Table 4*, 95% of all 145 respondents said that there were options which would not provide either an adequate or sustainable supply of aggregates to 2020. *Figure 2* shows that there are clear sub-regional patterns in the responses, with most responses from Staffordshire and Shropshire being against Options 1a, 1b and 1c; but with respondents from Warwickshire being against Options A-E. Many respondees from across the region were against Option 3b; whilst there was generally widespread support for Option 2.

Table 4: Responses to Question 3

Sub-Region:	Yes	% of all respondees	Yes
Herefordshire	0	-	0
Shropshire	3	60%	0
Staffordshire	116	98%	0
Warwickshire	4	100%	0
West Midlands	11	92%	0
Worcestershire	0	-	0
Outside Region	4	57%	0
Total	138	95%	0

IF YES, PLEASE STATE WHICH OPTION(S) YOU CONSIDER WOULD NOT PROVIDE AN ADEQUATE OR SUSTAINABLE SUPPLY OF AGGREGATES AND PROVIDE EVIDENCE TO SUPPORT YOUR VIEW.

Figure 2: Responses to Question 3 – Options which you consider would not provide an adequate or sustainable supply of aggregates



Reasons given for why **Option 1a, 1b and 1c** would not provide an adequate or sustainable supply of aggregates included:

- “Options 1a, 1b and 1c – based only on past sales trends do not afford opportunity to consider supply options that might meet future needs and provide a more sustainable pattern of supply”. (*Councillor, Newcastle under Lyme*).
- “They are all based on historical sales and given the negative impact on the landscape and environment in Staffordshire, the burden should be spread far more fairly across the region” (*Resident, Walsall*)
- “These options would mean as resources are used up there would be increased pressure on other local supplies without the need to maximise recycling and using other technologies” (*Resident, Lichfield*).
- “These options would maintain the concentration of sand and gravel working in Staffordshire. As quarries are exhausted, the options would exert pressure to replace production capacity within other areas in Staffordshire that could be either subject to the impacts of quarrying or in areas not ideally located to serve areas of demand” (*Resident, Burton-on-Trent*)

The main reason given by respondents against **Option 3b** was that it would increase the requirement for sand and gravel to replace crushed rock.

- “it would involve increasing reliance on the sand and gravel resource which is already required to contribute 67% of aggregate minerals” (*Resident, near Tamworth*)
- “There appear to be few advantages in seeking to increase the sand and gravel apportionment further when all the evidence suggests that there is likely to be more of a shortage of sand and gravel over the period to 2020 rather than crushed rock. This option will only exacerbate the

sand and gravel problem” (*4 Councillors in Warwickshire, supporting the Warwickshire County Council RAWP response*).

- “There needs to be an appropriate balance between the exploitation of sand and gravel and crushed rock resources given that the extent of impact of sand and gravel resources is more extensive. Furthermore, there are more extensive remaining permitted reserves of crushed rock. (This is the worst option of the lot!)” (*Resident, Alrewas, Staffordshire*).

Only one responsee opposed **Option 2**, and this was on grounds of concerns over reliability of supply and quality of secondary aggregates:

- “Supply depends upon the demolition of existing buildings and structures and reconstruction of highways and there are no reliable indicators, or land-bank, of the amount of material likely to arise. With regard to quality, new engineering and building structures are subject to demanding quality control and this becomes difficult if not impossible using recycled aggregates. Thus the outlets for recycled materials are limited and great care should be exercised in predicting future supply and demand. In that a considerable amount of recycling has taken place during the past few years it is possible that the greater part of the contribution from these sources is already contained in the aggregates production figures.” (*Aggregates company, Cheshire*)

Reasons given against **Options A, B, C, D and E** by respondents from Warwickshire and outside the region included that these options are unrealistic, very different, and based on incomplete data and flawed assumptions. One other response (from Staffordshire) raised concerns about the effect of reducing apportionment on beneficial afteruse for recreation, leisure and regeneration and the impact on other phasing issues relating to infrastructure provision.

- “The LUC Options A B C D and E are unrealistic, undeliverable and are not backed up by a watertight evidence base. However I think this is more to do with the short timescale of the study and it could be improved with more time and research. The main concerns amongst others are: (1) There is not adequate weighting given to past sales: any weighting must be based on a period longer than 3 years sales as the particular 3 year period to 2007 is distorted due to the peak of the construction boom. I do not recall agreement to a 3 year period. The report does not explain why a 3 year period was used. (2) Unsterilised resource – the study states that there are gaps in the data eg areas that are unmapped. In addition the depth and quality of the resource are not mapped only the surface areas. There appear also to be gaps in the provision of worked out sites data. Could the consultants confirm whether they have checked the data against the latest BGS Britpits data which could give a more accurate picture across the region than the 1999 ? Unless this evidence is produced I am concerned that the study is incomplete and the evidence could be challenged. (3) Options – I am not sure that the weightings being designed to give extreme findings is helpful. It may give certain communities the false hope that it is possible to reduce aggregate extraction in their areas when in practice this could not be achievable in the short to medium term” (*4 Councillors in Warwickshire, supporting the Warwickshire County Council RAWP response*).
- “Options A to E contain a degree of uncertainty and conjecture and some are based on flawed or incomplete reasoning. For example, it is acknowledged in the report that the full distribution of minerals is not known across the region. There is also no data on the depth of mineral resources and also the quality of the resource. These factors are crucial in determining where mineral extraction should take place... distribution of the resource is fundamental and should have been taken into account as the starting point for the study rather than an afterthought.” (*Aggregates company, Cheshire*)

- “the possible impact of either mothballing sites or deferring extensions to existing sites on their after use especially where these offer leisure and recreational use. This is particular interest in the Trent Valley and the ambitious plans focussed on the Central Rivers Initiative but also at a site north of Uttoxeter where after use proposals would assist in regeneration schemes for the town. The reduction in provision may also impact on other phasing issues allied to infrastructure provision” (*Councillor, East Staffordshire Borough Council*).

1.3 OTHER COMMENTS

Comments were made on the Interim Sustainability Appraisal (SA) and the Habitats Regulation Assessment (HRA) by the Council for the Protection of Rural England (CPRE), the Countryside Council for Wales (CCW), Natural England and 4 districts/boroughs in Warwickshire who supported the Warwickshire County Council RAWP response.

On the Interim SA, the main comments related to concerns over the interpretation of some sustainability objectives (notably the ‘local stewardship’ objective), the lack of baseline data and evidence of impacts, the assessment of effects on other regions neighbouring the West Midlands and the need for clarification of assumptions and some other details in the analysis.

On the HRA, a number of detailed comments were made on the veracity and accuracy of certain aspects of the analysis, and the need for clarification of points of detail. Three comments were made on the options process. One respondent expressed concern that the options have not been sufficiently or properly consulted on, and that these are inconsistent with the options as defined in the wider consultation on minerals policy in Phase Three. Other respondents considered that the HRA has gone beyond its remit in proposing a new option, and were concerned that this new option has not been subject to SA. Another respondent supported the HRA in proposing a new option.

List of Non-RAWP Consultation Respondents

Name:	Organisation:	Location:	Sub-Region:
Anne Adams	Resident	Lichfield	Staffordshire
David Adams	Resident	Lichfield	Staffordshire
Reverend John Allan	Resident	Near Burton on Trent	Staffordshire
Eddie Allison	Resident	Near Burton on Trent	Staffordshire
Anne Anderson	Gravel Group	Alrewas	Staffordshire
Hamish Anderson	Resident	Near Burton on Trent	Staffordshire
Michael Atkinson	Gravel Group	Near Burton on Trent	Staffordshire
Cynthis Atwell	Resident	Near Burton on Trent	Staffordshire
Craig Bailey	Resident	Tamworth	Staffordshire
Bernard & June Baker	Resident	Near Burton on Trent	Staffordshire
Paul Baker	Resident	Near Burton on Trent	Staffordshire
Nicholas Balmer	Resident	Lichfield	Staffordshire
Dorothy Barratt	North Warwickshire Borough Council	North Warwickshire	Warwickshire
Jane Batchelor	Resident	Tamworth	Staffordshire
Neil Batchelor	Resident	Tamworth	Staffordshire
Cllr Erica Bayliss	Resident	Near Cannock	Staffordshire
Vic Beddow	Resident	Wolverhampton	West Midlands
Anna Bennett	Resident	Lichfield	Staffordshire
Clive Bennett	Fradley & Streethay Parish Council	Lichfield	Staffordshire
Martyn Bennett	Resident	Lichfield	Staffordshire
Christine Billingham	Resident	Tamworth	Staffordshire
Roger Billingham	Resident	Tamworth	Staffordshire
Carole Anne Bowns	Resident	Kings Bromley	Staffordshire
Paul Bowns	Resident	Near Burton on Trent	Staffordshire
Charles Bradshaw-Smith	Resident	Near Burton on Trent	Staffordshire
Rev Denise Burgess	Resident	Tamworth	Staffordshire
Phillip Burgess	Resident	Tamworth	Staffordshire
Jean Burton	Alrewas Parish Council	Alrewas	Staffordshire
Brian Cadman	Resident	Near Burton on Trent	Staffordshire
John Cannon	Resident	Lichfield	Staffordshire
Richard Case	Resident	Lichfield	Staffordshire
Bill Cash MP	Resident/MP	Stafforshire/London	Stafforshire/London
Majorie Cashmore	The Ramblers Association	Stafford	Staffordshire
David & Judith Clarke	Resident	Tamworth	Staffordshire
Catherine Cliffe	Resident	Ashby de la Zouch, Leics.	Leicestershire
Dr Joanne Cliffe	Resident	Tamworth	Staffordshire
Patricia Cliffe	Resident	Tamworth	Staffordshire
Simon Collinson	Resident	Lichfield	Staffordshire
Timothy Corbett	Resident	Burton on Trent	Staffordshire

Name:	Organisation:	Location:	Sub-Region:
Michelle & Steve Cottom	Resident	Lichfield	Staffordshire
Stephen Cox	Resident	Walsall	West Midlands
Keith Davies	Countryside Council for Wales	Bangor, Wales	Gwynedd
Cllr Peter Davies	Resident	Burton on Trent	Staffordshire
Richard Donovan	Resident	Tamworth	Staffordshire
SE Donovan	Resident	Tamworth	Staffordshire
Mr KM Dorman	Resident	Tamworth	Staffordshire
Mrs M Dorman	Resident	Tamworth	Staffordshire
David Dunicliff	Resident	Near Burton on Trent	Staffordshire
Cynthia Dunning	Resident	Near Burton on Trent	Staffordshire
Michael Dunning	Resident	Near Burton on Trent	Staffordshire
David & Jayne Dury	Resident	Hints	Staffordshire
Chris Ellerington	Resident	Near Burton on Trent	Staffordshire
Sarah Elxom	Resident	Rugeley	Staffordshire
Graham Evans	Resident	Stoke on Trent	Staffordshire
Frederick George Fisher	Resident	Yoxall	Shropshire
Sarah Fisher	Rugby Borough Council	Rugby	Warwickshire
Kelly Ford	Nuneaton & Bedworth Bor. Council	Nuneaton & Bedworth	Warwickshire
Geoff Foster	Resident	Tamworth	Staffordshire
Brian Gibbens	Resident	Near Burton on Trent	Staffordshire
Bob Glover	Resident	Lichfield	Staffordshire
Roger Goodwin	Madeley Conservation Group	Madeley, Near Crewe	Cheshire
Angie Guest	Leek Ramblers	Buxton, Derbyshire	Derbyshire
David Harrison	Resident	Near Burton on Trent	Staffordshire
Mr P Haslimann	Resident	Lichfield	Staffordshire
Mrs D Hill	Resident	Near Burton on Trent	Staffordshire
Roger Hill	Resident	Near Burton on Trent	Staffordshire
Pauline Hupfield	Richard Crosse School	Near Burton on Trent	Staffordshire
Charles Jarman	Resident	Near Burton on Trent	Staffordshire
Jessica Jenkinson	Loggerheads Parish Council	Market Drayton	Shropshire
Andy Johnson	South Staffs Council	Codsall	Staffordshire
Brian Jones	Resident	Near Burton on Trent	Staffordshire
Linda Jones	Resident	Near Burton on Trent	Staffordshire
Paul Jones	Resident	Tamworth	Staffordshire
Gerald Kells	CPRE	Walsall	West Midlands
Mr GD Kynaston	Resident	Sutton Coldfield	West Midlands
Sarah Lander	Resident	Lichfield	Staffordshire
Stephen Lander	Resident	Lichfield	Staffordshire
Martin Lane	Resident	Lichfield	Staffordshire
Cllr Michael Lawrence	Resident	Wolverhampton	West Midlands
John Leavesley	Resident	Near Burton on Trent	Staffordshire
Maria Leavesley	Resident	Near Burton on Trent	Staffordshire

Name:	Organisation:	Location:	Sub-Region:
Vivienne Leyland	Resident	Near Burton on Trent	Staffordshire
Anthony/Margaret Lloyd	Resident	Tamworth	Staffordshire
Paul Lovern	Richard Crosse School	Near Burton on Trent	Staffordshire
Joanne Maddocks	Resident	Tamworth	Staffordshire
Cllr Robert Marshall	Resident	Stafford	Staffordshire
Anna Mason	Resident	Near Burton on Trent	West Midlands
Hazel McDowall	Natural England	Birmingham	West Midlands
Georgina Jane Mills	Resident	Tamworth	Staffordshire
Gareth Moss	Resident	Near Burton on Trent	Staffordshire
Lesley Mycroft	Resident	Near Burton on Trent	Staffordshire
Paul Norris	Resident	Yoxall	Staffordshire
Robin Norris	Resident	Tamworth	Staffordshire
Richard Oakley	Resident	Elford	Staffordshire
Susan Parkes	Resident	Near Burton on Trent	Staffordshire
Ron Peacock	Resident	Tamworth	Staffordshire
David Pearson	Resident	Near Burton on Trent	Staffordshire
Frances Pountney	Resident	Tamworth	Staffordshire
Noel Poxon	Resident	Burton on Trent	Staffordshire
Dr Stephanie Prestage	Resident	Birmingham	West Midlands
Ian Pritchard	Resident	Walsall	West Midlands
Colin and Susan Reisner	Resident	Near Burton on Trent	Staffordshire
Michael Richards	Resident	Lichfield	Staffordshire
Betty Riley	Resident	Near Burton on Trent	Staffordshire
Davie Riley	Resident	Near Burton on Trent	Staffordshire
John Robotham	Resident	Tamworth	Staffordshire
Susan Robotham	Resident	Tamworth	Staffordshire
Mr & Mrs Robinson	Resident	Tamworth	Staffordshire
Terence Roome	Resident	Lichfield	Staffordshire
Paulette Ross	Resident	Birmingham	West Midlands
Graham Rothery	Ramblers Association Staffordshire	Near Burton on Trent	Staffordshire
Delyse Sanders	Alrewas Conservation Group	Near Burton on Trent	Staffordshire
Roger Sanders	Resident	Near Burton on Trent	Staffordshire
John Scott	Resident	Birmingham	West Midlands
Graham Sedgley	Loggerheads Parish Council	Market Drayton	Shropshire
Sally Shoemith	Resident	Lichfield	Staffordshire
Philip Siddell	Resident	Near Burton on Trent	Staffordshire
Graham Slight	Resident	Near Burton on Trent	Staffordshire
Brian Smith	Resident	Near Burton on Trent	Staffordshire
George Ronald Smith	Resident	Near Burton on Trent	Staffordshire
Joyce P Smith	Resident	Near Burton on Trent	Staffordshire
Keith Smith	Resident	Near Burton on Trent	Staffordshire
Pamela Smith	Resident	Near Burton on Trent	Staffordshire

Name:	Organisation:	Location:	Sub-Region:
Phillip Somerfield	Resident	Burton on Trent	Staffordshire
Nicolas Speakman	Madeley Core Minerals Strategy Group	Madeley, Near Crewe	Cheshire
Gary Stephens	Warwick District Council	Warwick	Warwickshire
Peter Stone	Resident	Near Burton on Trent	Staffordshire
Lesley Stretton	Resident	Near Burton on Trent	Staffordshire
Jennifer Synnot	Resident	Near Burton on Trent	Staffordshire
Mark Taplin	Resident	Shrewsbury	Shropshire
Roger Thompson	Resident	Tamworth	Staffordshire
Paul Till	Resident	Near Burton on Trent	Staffordshire
John Toogood	Resident	Tamworth	Staffordshire
Simon Tullitt	Resident	Near Burton on Trent	Staffordshire
Ray Vanstone	Tamworth Borough Council	Tamworth	Staffordshire
Abigail Vaughan	Resident	Lichfield	Staffordshire
Mervyn Vaughan	Resident	Lichfield	Staffordshire
Jeremy Wade	Resident	Lichfield	Staffordshire
Geoff Wadlow	Resident	Lichfield	Staffordshire
Sean Walsh	Newcastle under Lyme Borough Council	Newcastle under Lyme	West Midlands
Chris Watson	Resident	Near Burton on Trent	Staffordshire
David Walton	Resident	Lichfield	Staffordshire
Sharon Webb	Resident	Near Burton on Trent	Staffordshire
Gez Willard	Madeley Aggregates Ltd	Congleton, Cheshire	Cheshire
Mrs Young	Resident	Near Burton on Trent	Staffordshire

West Midlands Regional Aggregate Working Party

Mark Middleton
Director of Policy
West Midlands Regional Assembly
Regional Partnership Centre
Albert House
Quay Place
92-3 Edward Street
Birmingham
B1 2RA

Your Ref:

Our Ref: PPW/WJC

Date: 16 February 2010

Dear Mr. Middleton,

SUB REGIONAL APPORTIONMENT OF AGGREGATES PROVISION IN THE WEST MIDLANDS 2005-2020

1. I refer to your letter dated 12 October 2009 requesting that the West Midlands Regional Aggregates Working Party undertake the sub-regional apportionment exercise and regional consultation on behalf of the Regional Assembly.

2. The WMRAWP have held three meetings on 15 October 2009, 4 December 2009 and 9 February 2010 to consider a number of options for the sub regional apportionment of aggregates for the West Midlands. Options 1a, 1b, 1c, 2, 3a and 3b were generated by the RAWP itself, and options A to E were generated by Land Use Consultants (LUC) who were commissioned by the Regional Assembly.

At the WMRAWP meeting on 9 February 2010 LUC made a presentation of the work they had done with the support of officers from the MPAs and the Assembly to addresses these criticisms. They presented two further options Option F on past sales and a refined Option F which provided the opportunity to introduce a phased change in apportionment methodology from past sales to one based on a number of factors.

The WMRAWP agreed to recommend to the RPEE that Option 1c was the RAWP preferred option (based on a sales average for the 10 years preceding 2007). The WMRAWP did not support any of the LUC options A to E but did recommend that the two new options presented by LUC "Option F" and "Refined Option F" merited further consideration and should be the subject to a further limited consultation to commence on 17 February 2010 for 9 days. These two new options will be considered by WMRAWP on 3 March 2010.

3. On the basis of the reports we received, the evidence placed before us and the results of the technical consultation held between 18 December and 22 January 2010 we would wish to make the following comments:-

3.1 The regional guidelines for the West Midlands comprises the following requirements and assumptions -

- 165 million tonnes of sand and gravel
- 82 million tonnes of crushed rock
- 100 million tonnes of alternative materials (secondary and recycled aggregates)
- 23 million tonnes of imports principally from Wales.

3.2 There is no evidence before us that indicates that the import assumption figure is capable of being increased or reduced and therefore it should be accepted.

3.3 There is no clear evidence before us that the amount of recycled materials can be increased beyond the 100 million set out in the regional guidelines. The guideline figure already takes into account an increase in the contribution of recycled materials to aggregate demand in the region. If WMRA wishes to propose a further increase in the proportion of recycled aggregates then further technical work will be required. This could be done as part of the preparation of the new regional strategy and if so should be integrated with work on updating the evidence and requirements for waste planning in the region especially Construction, Demolition and Excavation wastes. It could also form part of a separate study commissioned by WMRA.

3.4 In terms of crushed rock there are substantial permitted reserves in the West Midlands and an increase in the level proposed may be possible but the level of increase and timing plus any environmental implications would need to be considered further.

3.5 The figure for sand and gravel has been the subject of considerable debate. Over the past few years regional sales have been running below the current apportionment figures. In the South East CLG released details of sensitivity testing carried out as part of the preparation of the new guidelines. The result of this was to reduce the regional guideline figure from 12.18 to 11.12 million tonnes on an annualised basis and the EIP Panel have recommended that the lower figure be used to calculate sub regional apportionments. WMRA could therefore seek the release of the information relating to the West Midlands before making a final decision on the apportioned amounts for each sub region.

3.6 In terms of the question of acceptable environmental costs the majority view of WMRAWP members, taken from the technical consultation responses, was that the regional guidelines could be met at acceptable environmental cost. The minority of WMRAWP members who responded that the guidelines could not be met at acceptable environmental costs made a number of comments in support of their case but that did not amount to sufficient evidence to change the view of the majority of the WMRAWP members.

4. The WMRAWP comments on the apportionment options which were devised for consideration are as follows:

Option 1

4.1 This contained two variations to the current three year methodology (1999 -2001) based on past sales. The majority of respondents to the technical consultation said that they preferred Option 1c (10year average) for both sand and gravel and crushed rock because it provided a better indication of trends over time and would iron out any temporary variations to the trend.. It was also a tried and tested method, related well to existing supply patterns in the region. This option (and option 1a and 1b) scored 3 "Minor Positives" in the draft sustainability appraisal

4.2 On this basis Option 1c was supported by the majority of WMRAWP members with the exception of Staffordshire and Stoke on Trent. WMRAWP agreed that for the purposes of carrying out the apportionment the 10 year period for calculating the average would be 1998- 2007.

4.3 At the WMRAWP meeting held on 9th February 2010 two further potential options X and Y were made available which provided details of possible apportionments combining Option 1c with increases in recycling rates of 11% and 25% and a 10% increase in crushed rock sales. These two options were set aside however in view of:-

- The lack clear evidence to justify the increases in recycled materials and crushed rock;
- Doubts about the early deliverability of these options,
- Market differences; and
- Incompatible technical and user specifications.

Option 2

4.4 This option proposes an increase in the level of recycling of aggregates by 25% over the guideline figure. It ranked the third most sustainable by the majority of the respondents to the technical consultation. However, it is acknowledged that the figure is aspirational and is not supported by evidence of availability and quality.

4.5 If WMRA wishes to pursue this option then further work will be required to identify the potential increase in recycling that could be sustained over the lifetime of the guidelines including the potential for a phased approach to increase proportions of recycled material and policy support from the waste sector. However, a robust methodology for obtaining information regarding quantities and qualities and capacities would need to be devised to enable accurate assessments and determine the scope for any increased contribution. The work could be carried out as part of the preparation of the new regional strategy and should be integrated with work on updating the evidence and requirements for waste planning in the region especially Construction, Demolition and Excavation wastes. It could also form part of a separate study commissioned by WMRA.

Option 3

4.6 There are two variations on substitution (a) crushed rock for sand and gravel and (b) sand and gravel for crushed rock. These two options were not supported by WMRAWP in view of the difficulties with establishing clear evidence to justify either of the two substitution options, and doubts about their deliverability. The draft HRA shows the sand gravel substitution (option 3b) to be the worst performing.

LUC Options

5. The WMRAWP comments on the options produced by LUC were as follows:-

5.1 The LUC report has been criticised by many respondents because of the:-

- Omissions/weaknesses in the data especially with regard to resources
- The practicality/deliverability of the outputs from Options A- E
- Concerns about the applicability of the methodology to the West Midlands region
- The failure to include other factors such as proximity to market

5.2 The LUC options A and C only scored 1 "Minor Positive" in the draft sustainability appraisal and options B, C and D scored 2.

5.3 As a result of the comments of WMRAWP members that came forward during the technical consultation WMRAWP would recommend that options A to E should not be pursued further by WMRA.

5.4 However after the presentation on 9th February by LUC , WMRAWP felt there were merits in considering the two new options (options F and Refined F) further and they recommended that they be subject to a further limited consultation with WMRAWP members. The WMRA representative agreed with the recommendation and we look forward to receiving the consultation papers on 17 February 2010. The two options will be considered by WMRAWP on 3 March 2010 after which a further representation will be made.

Yours sincerely,

Paul Wilcox
Chair of WMRAWP

Interim Policy Statement for Construction Aggregates

2nd Draft

Policy Objective

1. To produce new sub-regional apportionments for construction aggregates for the West Midlands for the period 2005 – 2020 and to provide advice to MPAs on extending those apportionments up to 2026.
2. Construction aggregates (sand and gravel and crushed rock) are essential to built development, other construction and maintenance of infrastructure (e.g. roads, flood defences) and are therefore essential to deliver growth and to sustain Urban and Rural Renaissance in the West Midlands.

Key Messages from the Phase Three Option Consultation

3. The suggested aggregates apportionment is not considered realistic. There was a considerable body of opinion which felt that the apportionment is too high for Staffordshire, and some were of the view that it is too high for the region as a whole. Most of those responding supported an apportionment using different sub-regions and methods, although there is some resistance to using the sub-regions proposed by the Section 4(4) authorities.

Background

4. In order to maintain adequate and steady supplies of materials on the one hand, and protect valuable landscapes and communities on the other, a national managed aggregates supply system operates providing guidelines for regional provision.
5. The Government determines the future national requirements for aggregates and apportions it between the regions based on past production, regional shares, future levels of construction activity and growth to give a regional requirement.(National and Regional Guidelines for Aggregates Provision in England: 2005-2020) (June 2009)
6. The current regional provision based on the 2003 guidelines was apportioned sub-regionally by the Regional Planning Body following advice from the West Midlands Regional Aggregates Working Party and incorporated into the West Midlands Regional Spatial Strategy (June 2004) as Policy M2. The 2003 national and regional guidelines and sub-regional apportionment set out in Policy M2 cover the period up to 2016. The figures need to be reviewed and projected forward to cover the period up to 2020 to ensure supplies are available to meet future needs.
7. Across the country there are geographical imbalances between the supply of, and demand for, aggregates at national level and therefore a mixture of sites is needed to contribute to meeting local, regional or national demands. This imbalance is reflected in the West Midlands region by the relationship between consumption in the Major Urban Areas and the provision of supplies of primary aggregates from mainly rural areas.
8. The draft revision to the WMRSS Phase 2 (covering the period up to 2026) proposes major new housing development across the region, additional employment sites and the development of a better transport system.

9. This level of future growth may require additional materials to be found by defining areas for new minerals extraction. However, demand for resources could be reduced by reducing the quantity of material used in new construction, and maximising the use of alternative materials in construction projects wherever possible.

Policy Position

10. The Government has published a new regional provision for the West Midlands which requires 370 million tonnes of aggregates and alternate materials to be provided over the period 2005-2020 (June 2009)

11. This comprises the production of 247 million tonnes of primary aggregates (165 million tonnes of sand and gravel and 82 million tonnes of crushed rock), 100 million tonnes of alternate materials and 23 million tonnes from imports outside the region.

12. In the absence of mechanisms to apportion the alternate materials requirements amongst the various Mineral Planning Authorities in the region the figure of 247 million tonnes for primary aggregates has been used to carry out the sub regional apportionment.

13. Table 1 is the sub-regional apportionment up to 2020 based on the recommendations of the WMRAWP/consultants/WMRA. In determining the requirements beyond 2020 the MPAs will have to project the agreed figures at a constant value for a further period of 6 years up to 2026. This is based on advice from CLG when determining the likely sub-regional apportionment for the period 2016-2021 (which was the end date of the current WMRSS) from the previous National and Regional Guidelines (June 2003)

Table 1: Apportionment of the Regional Guidelines 2005-2020 (million tonnes) by existing sub-regions

	Annual Apportionment	Annual Apportionment
	Sand & Gravel	Crushed Rock
Herefordshire	xx	xx
Worcestershire	xx	xx
Shropshire	xx	xx
Staffordshire	xx	xx
Warwickshire	xx	xx
West Midlands County	xx	xx
Regional Total	10.3	5.12
Regional Total 2005-2020	165	82

14. The figures are considered appropriate to meet local, regional or national demands and can be achieved without unacceptable environmental costs, undue harm to the quality of the environment in the West Midlands and without conflicting with any regional spatial objectives.

Contribution of Alternative Materials to Future Supply

15. The Government's regional provision includes a requirement to provide 100 million tonnes of alternative materials over the period 2005-2020. This is an increase in the contribution towards total aggregates provision from 24% to 27% and an increase of 17.5% for the annual requirement – 5.5 million to 6.66 million tonnes.

16. The quality of the available data is not sufficiently robust to determine reliable geographical area based local apportionments for alternate materials. However, Policy W9 in the revised draft WMRSS (Phase 2) requires new sites for facilities to store, treat and recycle soils and construction and demolition waste to be provided and for more recycling through on site activities and purpose built facilities in urban areas.

17. MPAs in their LDFs will need to consider if there sufficient capacity to deliver the increase level of recycling now required. They will also need to consider what other measures they can take to maximise the use of alternative materials in local construction projects.

18. The delivery of this increase in use of alternative materials will require better collection of data (e.g. through regular WMRAWP surveys of secondary aggregates, waste management capacity monitoring , and monitoring of on-site recycling through the development management process) and greater emphasis being placed on the reuse and recycling of on site materials particularly in the Major Urban Areas