Appendix 3



# Medway Authority Monitoring Report 2018

# Volume 3 - Local Aggregate Assessment 2018



December 2019

# **Executive Summary**

This is the seventh Local Aggregate Assessment (LAA) produced for Medway, in line with the requirements set out in the National Planning Policy Framework (NPPF) and in the Planning Practice Guidance (PPG). The report covers the 2018 calendar year and is circulated to Minerals Planning Authorities throughout the South East and neighbouring areas, industry representatives and other key stakeholders for comments.

The council has considered a range of data sources in compiling information on the demand for aggregates and supply options available; with the annual aggregate monitoring produced by the South East England Aggregates Working Party (SEEAWP) based on a survey of local operators being a key source of data. Due to the size of Medway and the limited number of minerals sites and wharves, there are some areas where it is not possible to publish sales data due to commercial confidentiality.

## Land-won Aggregate

Currently, sand and gravel is the only land-won aggregate actively being extracted in Medway. In the past this has also included other minerals such as clay, chalk and brickearth; however, recent demand for the extraction of these minerals has been limited in Medway.

There are currently two permitted quarries for the extraction of sand and gravel in Medway, one inactive and the other commencing extraction in 2017. One quarry was fully operational in 2018.

## **Recycled and Secondary Aggregate**

Sales of recycled and secondary aggregate was significantly lower in 2018 compared to 2017.

## Marine-won sand and gravel

Medway's wharves continue to demonstrate their regional importance, reporting 1.213 Mt of marine-won sand and gravel sales in 2018.

No sales of marine-won soft sand were reported in 2017.

## **Crushed Rock**

Sales of crushed rock through the wharves have increased by over 30% compared to 2017. This is supported by the opening of an additional aggregates wharf at London Thamesport in 2017.

# Demand

The council has analysed a range of sources to project any trends that may be emerging that would influence demand. The population of Medway is projected to increase significantly, while house builders are reporting increased workloads and planning permissions nationally, indicating a potential increase in demand over the coming years. A number of significantly large regional infrastructure projects are also expected to increase demand.

Current permitted reserves of sand and gravel is 1.047 Mt, providing a landbank of 21 years based on 3-year average sales data. This position is further supported by Medway's wharves and increasing rate of supply of recycled and secondary aggregate.

# Conclusion

Medway plays a strategic role in regional aggregates supply, most notably through the wharves located on the Medway and the Thames.

The council will plan positively for the steady and adequate supply of aggregate through the emerging Local Plan in order meet the needs of the local and regional markets.

	Summary – Medway Council (for the calendar year 2018)								
Quarry Sales	2018 Sales (Mt) & Trend <sup>1</sup>	Average (10-yr) Sales & Trend <sup>1</sup>	Average (3-yr) Sales & Trend <sup>1</sup>	LAA Rate (Mt) <sup>2</sup>	Reserve (Mt)	Landbank (years)	Allocations (years)	Capacity (Mtpa)	Comments <sup>3</sup>
Soft Sand									No known reserves
Sharp Sand & Gravel	с	0.017 <b>1</b>	0.050 <b>1</b>	0.050	1.047	21	n/a	>0.200	Two quarries, one inactive
All Sand & Gravel <sup>4</sup>	с	0.017 <b>1</b>	0.050 <b>1</b>	0.050	1.047	21	n/a	>0.200	Two quarries, one inactive
Crushed Rock									No known reserves

Aggregate Infrastructure Sales	2018 Sales (Mt) & Trend <sup>1</sup>	Average (10-yr) Sales & Trend <sup>1</sup>	Average (3-yr) Sales & Trend <sup>1</sup>	LAA Rate <sup>2</sup> (Mt)	Reserve (Mt)	Landbank (years)	Allocations (years)	Capacity (Mtpa)	Comments <sup>3</sup>
Recycled / Secondary Aggregates	С	0.044 <b>\bar{b}</b>	0.067	n/a				>0.075	Current temporary permissions may impact future supply
Marine Sand & Gravel	1.213 <b>\\\</b>	1.384 <b>\bar{b}</b>	1.662 <b>\\\</b>	n/a				2.150	Established importation and distribution facilities with potential for growth. The capacity is combined total for all wharves across all aggregate types
Rock Imports by Sea	1.247 <b>1</b>	0.902 <b>1</b>	1.035 <b>1</b>	n/a				2.150	Established importation and distribution facilities with potential for growth. The capacity is combined total for all wharves across all aggregate types
Rail Depot Sales (Sand & Gravel)	С	n/a	n/a	n/a				n/k	Established aggregates rail depot. Sales data not published due to commercial confidentiality. Clarification has been sought from the North Sea Terminal (Cliffe) operator.
Rail Depot Sales (Crushed Rock)	С	0.018 <b>1</b>	0.004 <b>\V</b>	n/a				0.100	Established aggregates rail depot. Sales data not published due to commercial confidentiality.

#### General Comments<sup>6</sup>

The supply of aggregates in Medway is currently sufficient, with the existing importation facilities providing a high percentage of aggregates for the wider London and South East area. With extraction of sand and gravel from the quarry at Kingsnorth commencing in 2017, the supply of aggregates from Medway is expected to increase.

In common with much of the South East, there is high demand for housing in Medway. The government's assessment of Local Housing Need in Medway is for almost 29,000 new homes by 2037.

Other major construction projects proposed in the wider South East region include Ebbsfleet Garden City, Lower Thames Crossing, Thames Tideway Tunnel, Crossrail 2, HS2 and the London Underground Northern Line extension.

c denotes where sales data is not published due to commercial confidentiality.

#### Footnotes:

- 1. **Trend –** indicates whether the average sales are (compared with the previous year's LAA average sales) increasing(upwards arrow), declining (downwards arrow) or no change (level arrow)
- 2. LAA Rate There should be LAA Rate for not only quarried aggregates but also aggregate sales at wharves, rail depots and recycled/secondary sites
- 3. **Comments** limit comments to explain possible anomalies e.g. peculiarities about current sales, landbank limitations, important infrastructure changes, soft sand sales at wharves, origins of aggregate imports by sea/rail etc
- 4. All sand and gravel data only required if AM confidentiality requirements breached by separately presenting information on soft sand and sharp sand and gravel
- 5. Shading apply where aggregate supply source is not relevant
- 6. General Comments explain overall picture with reference to demand, factoring in export requirements and sustainability of supply landbank, allocations, infrastructure capacity to meet this. If possible, should state whether the mpa considers it is making an appropriate contribution to what are understood to be the aggregate supply that is required of the mpa area and include an analysis of the adequacy of the current mineral/local plan and whether this should be reviewed

# 1. Introduction

- 1.1. This is the seventh LAA produced for Medway. It has been prepared in line with requirements set out in the NPPF (Paragraph 207) and the PPG. Paragraph 207 of the NPPF states Minerals Planning Authorities should prepare: *'an annual Local Aggregate Assessment, either individually or jointly, to forecast future demand, based on a rolling average of 10 years' sales data and other relevant local information, and an assessment of all supply options (including marine dredged, secondary and recycled sources)'.* The LAA then needs to be submitted to the regional Aggregate Working Party and through this to the National Aggregate Coordinating Group. The national group will then consider whether the totals provided by the area Aggregate Working Parties make appropriate provision to maintain a steady and adequate supply of aggregate. This process seeks to ensure the coordination of minerals planning at a strategic level.
- 1.2. LAAs play an important role in the coordination of planning for the supply of minerals to meet the country's needs. Aggregate minerals such as soft sand, sand and gravel and crushed rock are used as construction materials, and therefore are intrinsic to the nation's development, maintaining infrastructure and supporting economic growth.
- 1.3. Much of the data used in the preparation of this LAA comes from the annual monitoring of aggregates sales in Medway on behalf of the South East England Aggregate Working Party (SEEAWP). The annual Aggregate Monitoring survey collects sales data from active mineral extraction sites, minerals wharves, minerals rail depots and recycled aggregate processing sites.
- 1.4. Due to the size of Medway, and the limited number of minerals sites and wharves, some sources of data are restricted and cannot be disaggregated to a Medway level for reasons of commercial confidentiality and agreements made with industry operators. This is reflected in how and what data is presented in this report.

# 2. Land-won Aggregate

# **Geology of Medway**

2.1. The sand and gravel deposits in the Medway area are primarily concentrated on the Hoo Peninsula as a result of post-glacial melt water outwash deposition found in a series of 'river terraces', trending roughly from north west to south east across the peninsula's ridge, and on the Isle of Grain. There are also more recent water-lain deposits covering areas of land on the eastern and north-western marshes of the peninsula that include some sand and gravel seams. The deposits have not been significantly reworked by natural processes since their deposition, and have a sand to gravel ratio and particle characteristics that makes them generally attractive for high specification value added concrete production. An overview of Medway's geology is provided in Figure 1.



#### Figure 1: The geology of Medway

# **Environmental and Landscape Designations**

2.2. Medway covers an area of 26,886ha (including rivers and coastal areas), and within this area are several landscape and environmental designations that could constrain where minerals extraction could take place. These designations include: Special Protection Areas, Ramsar sites, Special Areas of Conservation, Areas of Outstanding Natural Beauty, Green Belt, Sites of Special Scientific Interest, Marine Conservation Zones, National Nature Reserves and Local Nature Reserves. The extents of the environmental and landscape designations in Medway are provided in Figure 2.



#### Figure 2: Environmental and Landscape designations in Medway

### **Extraction of Minerals**

- 2.3. Contained within Medway's geology there are a range of minerals that have the potential to be economically viable for extraction. These deposits include sand and gravel, chalk, London clay and brick clay. Extraction for these minerals has predominantly taken place around the river edge and across the Hoo Peninsula, but there have only been limited operations in recent years for the extraction of London clay and gravel.
- 2.4. The present total permitted reserve of sand and gravel for extraction in Medway is 1.047 Mt. This is derived from Kingsnorth Quarry to the south east of the village of Hoo St Werburgh, and a small remaining reserve at Perry's Farm in Grain, operated by Clubb, but is currently inactive. The locations of the permitted quarries are provided in Figure 3.
- 2.5. Kingsnorth Quarry is operated by Tarmac and includes a ready-mix concrete plant on site. Extraction commenced in 2017 and cumulatively 200,000 tonnes per annum of material can be removed from the site. It is currently the only operational quarry in Medway.
- 2.6. Research to support mineral planning work in Kent and Medway has provided an indication of significant available reserves in the area to help meet future demand.



#### Figure 3: Quarries in Medway

- 2.7. Due to the limited number of quarrying sites in Medway, it has not been previously possible to publish annual levels of sales of locally won sand and gravel. However, the council has been able to use data provided to the Aggregates Monitoring survey to produce a 3-year and 10-year average sales figure.
- 2.8. The current 10-year average sales for aggregates from quarries in Medway are 0.017 Mtpa and the 3-year average sales is 0.050 Mtpa. The 3-year and 10-year average sales data for land-won aggregate since 2007 is presented in Table 1.

Year	3-year average sales (Mt)	10-year average sales (Mt)
2007	0.033	n/a
2008	0.027	n/a
2009	0.018	n/a
2010	0.010	n/a
2011	0.003	n/a
2012	0	n/a
2013	0	n/a
2014	0	0.013
2015	0.003	0.010
2016	0.003	0.006
2017	0.009	0.006
2018	0.050	0.017

Table 1: 3-	vear and 10-vear	average sales	(Mt) for land-won	aggregate in Medway
10010 1.0-	year and ro-year	average sales		aggregate in meuway

2.9. Table 1 demonstrates how the average 10-year sales have gradually decreased due to the decline in minerals extraction since 2014, whilst the increase in the 3-year average reflects the more recent commencement of extraction at Kingsnorth Quarry. This increase is expected to also be reflected in the 10-year average sales over the coming years.

# Landbank

- 2.10. Medway is required to maintain a 7-year land bank for sand and gravel. Permitted reserves are considered to be 1.047 Mt. The current landbank calculated using the 3-year average sales is 21 years, and using the 10-year average sales the landbank increases to 62 years. With the increased activity in extraction more recently, it is considered appropriate to use the 3-year average sales to inform the LAA rate, as this better reflects the current status of land-won aggregates in Medway. The LAA rate in future will likely be based on 10-year average sales.
- 2.11. Due to Medway's geology, it is not necessary to maintain a landbank for landwon rock or a separate landbank for soft sand from that of sand and gravel.

# 3. Recycled and Secondary Aggregates

- 3.1. Materials defined as recycled or secondary aggregates are derived from demolition and construction waste, industrial by-products such as power station ash, colliery spoil, and blast furnace slag and slate. These materials can be used as substitutes for aggregates, such as in concrete production, or as fill.
- 3.2. The use of recycled and secondary aggregates is critical to the sustainable management of primary mineral resources. In line with government policy to secure the valuable finite resources of materials required for development, Medway Council promotes the use of alternatives to primary aggregates.
- 3.3. Facilities exist within Medway for the recycling of construction, demolition and excavation (CD&E) waste at fixed sites. There is additional capacity however, where significant amounts of material are understood to be dealt with on site by mobile plant as part of demolition and construction processes. Due to the low number of returns received from operators to the Aggregates Monitoring Survey 2018, it is likely that there are other fixed-site operators within Medway whose sales are not currently being recorded.
- 3.4. Commercial confidentiality prevents sales data from being published; however 3-year and 10-year average sales data provide a valuable insight into the position of the current market. In 2018, the 3-year average sales increased by 3%; while

the 10-year average sales decreased by one third. Table 2 provides the average sales since 2007 and this is presented as a line chart in Figure 4.

Year	3-year average sales (Mt)	10-year average sales (Mt)
2007	0.073	n/a
2008	0.110	n/a
2009	0.110	n/a
2010	0.106	n/a
2011	0.045	n/a
2012	0.051	n/a
2013	0.040	n/a
2014	0.025	0.069
2015	0.029	0.057
2016	0.044	0.064
2017	0.065	0.067
2018	0.067	0.044

Table 2: Sales (Mt) of recycled and secondary aggregate in Medway





3.5. It is worth noting that a number of recycling facilities (including those that handle recycled aggregate) are currently subject to temporary planning permission as part of the wider long-standing regeneration programme for the area. Work to identify alternative sites for such uses is being pursued through the Local Plan.

# 4. Wharves and Rail Depots

## Marine-won Sand and Gravel

- 4.1. Medway makes a critical contribution to the South East's infrastructure for the importation of aggregates, particularly marine dredged sand and gravel. The scale of the importation makes Medway's wharves of regional and national significance. There are four currently in operation:
  - Grain Terminal, Isle of Grain (wharf and rail depot): operated by Aggregate Industries.
  - North Sea Terminal, Cliffe, Rochester: operated by Brett Aggregates.
  - Euro Wharf, Frindsbury, Rochester: operated by Hanson Aggregates.
  - London Thamesport, Isle of Grain: operated by Medway Aggregates.

The location of the wharves and the rail depot in Medway is provided in Figure 5.

### Figure 5: Wharves and rail depots in Medway



4.2. Collectively, these five facilities make a significant contribution to the importation of minerals in to the region. Medway receives sand and gravel from a number of dredging regions; those of which that are located in British waters have their minerals rights owned by the Crown Estate. Medway's wharves are amongst the largest in Kent and Medway, and have the greatest capacity. The wharves are operating within their capacity levels which offer the ability to increase production in response to market demand.

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4.3. The sale of marine-won sand and gravel in Medway is presented in Table 3 and Figure 6. In 2018, the level of sales was recorded at 1.213 Mt, representing a one third decrease, though lower than the 3-year and 10-year average sales.

Year	Annual sales (Mt)	3-year average sales (Mt)	10-year average sales (Mt)
2007	1.565	1.286	n/a
2008	1.518	1.502	n/a
2009	0.740	1.274	n/a
2010	1.152	1.231	n/a
2011	1.167	1.020	n/a
2012	1.215	1.178	n/a
2013	1.400	1.261	n/a
2014	1.586	1.400	1.264
2015	1.597	1.527	1.336
2016	1.978	1.720	1.392
2017	1.794	1.790	1.415
2018	1.213	1.662	1.384

Table 3: Sales (Mt) of marine-won sand and gravel through wharves in Medway

4.4. The Aggregates Monitoring Survey return for the North Sea Terminal at Cliffe reported a significant decrease in annual sales, while the rail depot return for this site reported sales of sand and gravel. Clarification has been sought from the operator. It may be that wharf capacity was constrained in 2018 due to backfilling activity.

Figure 6: Sales (Mt) of marine-won sand and gravel through wharves in Medway



# Marine-won Soft Sand

- 4.5. It is possible that the demand for soft sand in the South East will increasingly need to be met by imports into the area and from marine won sources due to its scarcity and moreover by constraints upon its extraction. To help provide a detailed analysis of soft sand supply in the region, sales figures of marine-won soft sand are now separated out from those of marine-won sand and gravel.
- 4.6. A relatively small quantity of soft sand sales were reported in 2018. Such sales have been sporadic in the last 10 years. This may indicate that material is imported for a particular project or use where it is suitable to use marine-won soft sand in place of land-won. Further discussions with aggregates operators may provide insight into its use and the fluctuating nature of the sales data. A breakdown of the sales of marine-won soft sand for the past 12 years is presented in Figure 7.



Figure 7: Sales (Mt) of marine-won soft sand through wharves in Medway

## **Crushed Rock**

- 4.7. Medway does not have any natural hard rock resources and therefore relies on imports of crushed rock such as limestone and granite to meet demand for this type of aggregate.
- 4.8. Crushed rock arrives in Medway through both the wharves and a rail depot at Grain; with granite arriving through the wharves from Scotland and Norway, and limestone by rail from Somerset.

- 4.9. Due to commercial confidentiality, sales from the rail depot cannot be broken down other than by a 3-year sales average. Due to the records of sales only beginning in 2013, a 10-year average sales is unavailable.
- 4.10. Sales data for crushed rock through wharves and the rail depot are presented in Table 4 and Figure 8. In 2018, sales of crushed rock through Medway's wharves was recorded at 1.247 Mt; an increase of 31% of the sales recorded in 2017. The 2018 sales are higher than the average 3-year and 10-year average sales.

Year	3-year average sales (Mt): Rail depot	Annual sales (Mt): Wharves	3-year average sales (Mt): Wharves	10-year average sales (Mt): Wharves
2007	n/a	1.756	1.437	n/a
2008	n/a	1.240	1.511	n/a
2009	n/a	0.696	1.231	n/a
2010	n/a	0.909	0.948	n/a
2011	n/a	0.833	0.813	n/a
2012	n/a	0.761	0.834	n/a
2013	n/a	0.856	0.817	n/a
2014	n/a	0.775	0.797	1.038
2015	0.056	1.086	0.906	1.045
2016	0.025	0.912	0.924	0.982
2017	0.005	0.945	0.981	0.901
2018	0.004	1.247	1.035	0.902

Table 4: Sales	(Mt) of c	crushed rock	through	wharves and	rail depots in	Medway
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#### Figure 8: Sales (Mt) of crushed rock through wharves and the rail depot in Medway



# 5. Overview of Aggregate Sales

- 5.1. In order to provide a picture of complete data, average 3-year sales of aggregates in Medway have been amalgamated and presented in Figure 9.
- 5.2. The sales of aggregates appear to follow the same overall trend, with the exception of crushed rock imported through the rail depot. All sales decreased between 2008 and 2011. Subsequently, the overall sales trend has been generally upward. Sales of land-won sand and gravel decreased further past 2011 until 2015 when sales restarted; this upward trend is expected to continue with the commencement of extraction at Kingsnorth Quarry.



Figure 9: Amalgamated average 3-year sales (Mt) for aggregates in Medway

# 6. Future Aggregate Supply

- 6.1. The government's assessment of Local Housing Need for Medway is 28,611 for the new 2020-37 plan period. In addition to housing, the North Kent Strategic Housing and Economic Needs Assessment indicates the scale of employment and retail needs in Medway over the plan period. This research showed a total need for:
  - 50,000m<sup>2</sup> of B1 office space. 155,000m<sup>2</sup> of B2 industrial land and 165,000m<sup>2</sup> of B8 warehousing land.
  - 44,000m<sup>2</sup> of comparison retail floor space and 13,000m<sup>2</sup> of convenience (supermarket) retail space up to 2031.

The new local plan will also identify supporting infrastructure needs.

6.2. Local Housing Need is approximately twice the rate of past annual housing completions. Figure 10 shows the completions of new homes in Medway since 2012/13.





- 6.3. Regionally, a number of planned infrastructure projects are likely to put increased pressure on the supply of aggregates through Medway, including:
  - Lower Thames Crossing: A 13-mile new road and bored tunnel crossing under the River Thames between the east of Gravesend and Tilbury.
  - **Crossrail 2:** A proposed major new rail route through London between Surrey and Hertfordshire.
  - **Thames Tideway Tunnel:** A 16-mile drainage and sewerage tunnel currently in construction under much of the tidal section of the River Thames through central London.
  - **Northern Extension Line:** An extension to the London Underground Northern Line to Battersea.
  - **High Speed Rail 2:** A planned high-speed rail link between London and initially Birmingham (Phase 1), but later Manchester, Sheffield and Leeds (Phase 2).
  - **Ebbsfleet Garden City:** A planned development of up to 15,000 homes and 45,000m<sup>2</sup> of commercial floor space.
  - Housing and infrastructure delivery across Kent: Includes in the region of 178,600 additional homes (2011-31) and the provision of 163 extra form entries for schools (2017-23).
- 6.4. In order to deliver the projects noted above, Medway will endeavour to maintain a landbank and ensure that its aggregates infrastructure, essential for its

distribution, is safeguarded through the application of appropriate planning policy.

# Landbank

- 6.5. As reported in Section 2, the current landbank for land-won sand and gravel is 21 years, based on the 3-year sales average; this increases to 62 years when applying the 10-year sales average. The landbank is anticipated to shorten substantially over the coming years as Kingsnorth Quarry becomes fully operational.
- 6.6. Significant deposits of sand and gravel exist across the Hoo Peninsula; the council will actively plan to safeguard these areas through the emerging Local Plan to help ensure that a steady and adequate supply of aggregates is maintained.

# Capacity

- 6.7. As part of the Aggregate Monitoring Survey in 2016, site capacity was included for the first time. This was repeated in 2017 and it is hoped that an understanding of current site capacity can be used to assist planning for future demand. Details of capacity against the recorded 3-year average sales are detailed in Table 5.
- 6.8. Sales against capacity data collected across the past two years indicate sufficient headroom to accommodate a significant level of demand, with a capacity gap at the wharves of 34%. There is potential for capacity to be substantially increased with space available for additional wharf facilities at London Thamesport.

		2016	2017	2018
Land-won	Average 3-year sales of land- won sand and gravel (Mt)	0.003	0.009	0.050
sand and gravel	Total annual capacity (Mt)	>0.200	>0.200	>0.200
	Percentage of sales against capacity (%)	<1.5	<4.5	<25
Recycled and secondary aggregates	Average 3-year sales of recycled and secondary aggregate (Mt)	0.044	0.065	0.067
	Total annual capacity (Mt)	>0.100	>0.100	>0.075

Table 5: Sales of aggregates (Mt) against capacity (Mt)

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	Percentage of sales against capacity (%)	<44	<65	>89
	Sales through wharves (Mt)	3.096	2.739	2.462
Wharves	Total annual capacity (Mt)	4.000	4.150	4.150
	Percentage of sales against capacity (%)	77	66	59
Rail Depot	Average 3-year sales through rail depot (Mt)	0.025	0.005	n/k
	Total annual capacity (Mt)	0.100	0.100	n/k
	Percentage of sales against capacity (%)	25	5	n/k

- 6.9. The capacity picture is less clear with regard to recycled and secondary aggregate where limited capacity and sales data has been received from operators. Capacity is anticipated to increase in the near future however, with the granting of permission for a production plant for Hydraulically Bound Material (HBM) from recycled aggregates at Malmaynes Hall Farm, Stoke. The plant is expected to have an operational capacity of 0.075 Mtpa.
- 6.10. Clarification has been sought from the operator concerning the sales and capacity of the rail depot at the North Sea Terminal site at Cliffe.

# 7. Conclusion

- 7.1. This LAA indicates that Medway plays a strategic role in regional aggregates supply, notably through the wharves located on the Medway and Thames. The ability to handle large vessels and their proximity to markets in the wider South East and London elevates the wharves' importance to a regional level. Furthermore, the current surplus handling capacity allows for flexibility and provides assurance in their ability to respond to increased market demand.
- 7.2. A new Medway Local Plan is currently being prepared, with an anticipated submission date of 2020 for examination. Draft policy approaches were consulted on throughout 2018 and will be used to inform minerals policy production in the draft Local Plan, due for publication in 2020.

7.3. It is considered that Medway is making sufficient provision to ensure the steady supply of aggregates from a range of sources, and that it can continue to make an effective contribution to meeting local and wider needs for aggregates. The council will continue to actively participate in the work of SEEAWP and maintain cooperative working with neighbouring MPAs and industry operators.