

Nottinghamshire Mineral Local Plan Independent Examination

Inspector's Supplementary Questions

Statement by Jennifer Owen BA Geog, BSc Est Man, MRTPI on behalf of Brett Aggregates Ltd.

Matter 3 – Minerals Provision Policies

Policy MP1.

Question 28. Given the reducing level of sales of aggregates in Nottinghamshire, is the use of the 10-year sales average a robust approach to planning for aggregate provision, and is any reliable approach available?

Using the past 10 year annual average sales of aggregate for calculating the future requirement for the plan period of the MLP is based on previous experience of a construction market cycle of a 10 year duration. In this way it was expected that a 10 year period would cover a usual pattern of construction boom and recession. However, what such a simple model does not take into account is factors which impact on this pattern of construction activity. The BAL representations to the publication draft of the MLP sets out those factors which now need to be taken into account and used to modify the 10 year average sales¹.

The requirement to adjust the 10 year average aggregate sales figure in accordance with “.....other relevant local information” is National Policy² and unless this is done in the case of the MLP that document will not be sound in respect of compliance with National Policy.

The BAL analysis of other local information is based on practical guidance provided by the Planning Officers Society and the Mineral Products Association and takes into account the following:-

- **Geological resources being exhausted**

¹ Pages 8 to 17.

² NPPF para 207 (a)

- **Trends and forecasts of population change including information in Local Plans on housebuilding.**
- **Validated data on aggregate use in construction provided by the MPA.**
- **Planned major infrastructure projects** including those within the County and 30 miles beyond as detailed in the National Infrastructure Plan 2016-2020. Also those projects included in Local Economic Partnerships Growth Deals and Strategic Economic Plans together with construction projects identified in District and Unitary Authority's infrastructure Development Plans. Planned highway improvement and maintenance works should also be considered.
- **Local Regional and national economic forecasts** from various sources.
- Information from the minerals industry on the **availability of marine materials.**
- **Major new sources of recycled or secondary material becoming available.**
- **New environmental constraints being** identified in aggregate producing areas or in proximity to them.

These criteria provide a valid basis for the adjustment of the 10 year sales data in predicting the aggregate landbank requirement for the plan period and using this method BAL have calculated that 57.38MT of reserves are needed to cover the plan period.

In respect of the available resources note is now taken of the information provided by Heatons on behalf of Tarmac Trading Limited in respect of sites operated by Tarmac, new permissions and allocations the total existing and MLP future reserves are 26.80MT which leaves a shortfall of 30.58MT and consequently for the MLP to be sound with respect to compliance with national policy, justification in terms of the other policies in the plan and effectiveness in terms of delivering adequate aggregate through the plan period further allocations are required.

Question 29. Does the Sand and Gravel delivery schedule in Appendix 1 of the Plan demonstrate a steady and adequate supply of aggregates over the Plan period?

Attached is a spreadsheet where extracted from the Council's sand and gravel delivery schedule (MLP publication draft Appendix 1) the operator advised forecasts as opposed to permitted annual delivery rates for each site. The annual totals show that in none of the years of the plan period will delivery meet the past annual average sales of 1.7MT on which the MLP landbank is predicated (the BAL evidence is that this should be 3.02MT). Tarmac have advised (that in respect of key sites they operate the MLP cannot rely on permitted rates of delivery for operational reasons and therefore the MLP needs further new sites to provide for the shortfall.

Year	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	
Site																				
IDLE VALLEY																				
Newington South	100																			100
Finningley																				0
Sturton le Steeple		100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	1800
Bawtry Road		40	40	40	40	40	40	40												280
Bawtry Road West									30	30	30	30	30							150
Scrooby South	40	40	40	40	40															640
Scrooby North						40	40	40	40	40	40	40	40	40	40	40	40	40	40	400
Scrooby Thompson			40	20																
NEWARK																				
Cromwell	200	200	200	200	200	200	200	200	200	100										1900
Besthorpe	150	150	200																	500
Besthorpe East				200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	3000
Girton	0	50	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100			1550
Langford Lowfield	450	450	450	450	450	450	450	450	450	200										4250
Langford Lowfields North										250	450	450	450	450	450	450	450	450	450	4300
NOTTINGHAM																				
Mill Hill				280	280	280	280	280	280	280	280	280	280							
East Leake	180	180	180	180	180	180	180	180	180											1620
	1120	1210	1350	1610	1590	1590	1590	1590	1580	1300	1200	1200	1200	890	690	890	790	790	790	20490