

Nottinghamshire Minerals Local Plan

Rushcliffe Borough Council Statement in response to Supplementary Questions

MATTER 3 – MINERALS PROVISION POLICIES

Issue: Whether the minerals provision policies are positively prepared in terms of making adequate provision for minerals, whether they are consistent with national policy, justified and otherwise sound.

Q 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 alternative reliable approach available?*

When planning for an adequate supply of minerals, paragraph 207 of the NPPF (2019) places considerable emphasis on the Local Aggregate Assessment (LAA) and advice within from Aggregate Working Party. It specifically identifies the 10 year average sales data and other relevant local information as evidence within the assessment which should establish future demand.

Whilst sales of aggregates have fallen using the 10 year rolling average (the most recent LAA (December 2019) has again shown a decline from 1.53 to 1.46), this provides the most accurate data on historical demand and the basis for establishing future requirements. Predicting future demand according to what may or may not happen is understandably much harder and the County Council's response to Questions 19 and 20 of the Inspector's MIQs highlights the economic uncertainty (which is now increased), the implications of the commercial decisions by the industry, and the unknown movements of minerals between different Minerals Planning Authorities (notably Lincolnshire and Nottinghamshire) as factors which make this very difficult.

Notwithstanding these concerns, paragraph 5.30 within the LAA concludes that 'based on the information available, it is not considered necessary to identify additional aggregate reserves to meet future growth over the plan period.'

Given this uncertainty and the absence of any clear evidence that a more robust approach could be taken, the provision of aggregates required within Policy MP1 should be based on the 10 year rolling average figure.

As previously highlighted within Rushcliffe Borough Council's representation on the Publication Draft Plan, the provision of 32.30 million tons of Sand and Gravel (based on the 2017 LAA) within policy MP1 should be amended to reflect the 10 year rolling average within the most recent LAA. Since submitting this representation an updated LAA was published in December 2019. Based on the 2018 sales figures this establishes a 10 year average of 1.46 million tonnes. This would equate to 27.74 million tonnes over the 19 year plan period and should result in a reduction in the provision of Sand and Gravel within the plan of 4.56 million tonnes.

Given the uncertainty which is inherent when predicting future demand and required provision, as stated by the Council, the plan will continue to be monitored on an annual basis through the Local Aggregates Assessment and the plan will be reviewed on a 5 yearly basis as set out in the NPPF. Should demand increase there is sufficient flexibility to permit additional reserves subject to compliance with the development management policies within the plan.