

# **Nottinghamshire Minerals Local Plan - Issues & Options Consultation**

**20 November 2017 - 14 January 2018**

## **Comments of the Mineral Products Association**

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### **Question 1: Do you think any further information should be included in the overview of the area?**

1. We believe this is a succinct and useful introduction to the county. However, we would like you to say more about planned and expected development that might have implications for the future demand and supply of minerals, such as planned rates of housing growth, employment growth and the implications of HS2. For example, we know that HS2a (western corridor) will require the supply of 3 Million tonnes of concrete along its length. We do not at present know the demand for the planned eastern branch (HS2b) but we think you should mention the huge potential for increases in demand even if not all of this comes from Nottinghamshire, since it is likely to distort supply patterns for many miles around when under construction.

### **Question 2: Do you agree with the draft vision? Are there other things we should include?**

1. You should change the term 'mineral reserves' in the paragraph on safeguarding to 'mineral resources' in line with BGS guidance and national policy.
2. You should also include mineral infrastructure in the safeguarding regime in accordance with national policy.
3. We believe the vision should be stronger about meeting the growth needs of the community; i.e. providing a steady and adequate supply of minerals to meet objectively assessed development needs, and then say you will also make an appropriate contribution to wider local and national needs.

**Question 3: Are the above strategic issues appropriate? Are there others we should consider?**

1. We broadly agree with the key strategic issues as proposed.

**Question 4: Do you think the average 10 year sales figure is the most suitable methodology for forecasting future aggregate demand in Nottinghamshire? If not please identify any alternatives you feel are realistic and deliverable and the evidence to support this approach.**

**Question 5: Do you think the same methodology (most recent average 10 year sales) should be used for each aggregate or is there merit in using different methodologies for different aggregates?**

1. National policy says that forecasts of demand should be based on a rolling average of 10 years sales data and other relevant local information, and an assessment of all supply options. National practice guidance says that forecasts must not be based solely on the 10 year rolling average. It is essential, especially now that we have come out of the recession, for the County Council to use this other relevant information. We are aware that the Council's change of approach is politically motivated, but it is not sound, and it is not best practice.
2. A number of things have distorted the traditional relationship between development in Nottinghamshire and sand and gravel supplies. You allude to the effects of the recession and to short term commercial decisions made by producers, which has resulted in large export volumes to Doncaster and large import volumes from Lincolnshire, and to quarries being mothballed as producers adapted to vastly difficult market conditions. This does not represent a long term sustainable supply pattern and should not be used as a straightjacket for future supply from the county, which still is the most important source of high quality sand and gravel in the region.
3. Companies have only recently had the capacity to recapitalise mothballed sites, and to look for replacements for others which had become exhausted, which takes a long time to come to fruition, and is not yet reflected in the sales figures. There is already strong evidence of industry interest in the county returning to the county, indicated by the numbers of new sites proposed for the last Local Plan process. It would be a profound mistake for the County Council to fossilise the current abnormal conditions which if not corrected will undoubtedly

lead to future underprovision of mineral contrary to the declared intentions of your draft vision and objectives, not to say national policy.

4. We commented on the failure to consider other relevant information as required by NPPF in our comment to the draft LAA in August 2017, which does not seem to have been heeded in this consultation document.
5. The LAA is indicating an annual housing completion rate of 4,574. As a reality check, we can compare the forecast with the last time 4,574 dwellings were completed which was in 2005 when 4,842 dwellings were completed. The extraction rate of sand and gravel in that year was 3.08 Mt. This would seem to suggest that the LAA 10 year rolling average of only 1.7 Mtpa is inadequate. This does not consider any of the infrastructure projects indicated in our response to question 1.
6. On this basis, the MPA considers that the County Council should plan for future sand and gravel demand of 3.0Mtpa for the plan period. By reference to your Table 2 this means that over the plan period (19 years) the requirement for sand and gravel will be 57 Mt. Deducting existing permitted reserves results in a shortfall to be proved by the Local Plan of 39.5 Mt. This means finding an additional 21.7 Mt than you have assumed.

**Question 6: Do you think extensions to existing permitted quarries should be prioritised over new greenfield quarries?**

**Question 7: Should different approaches (new sites/extensions to existing permitted quarries) be adopted for individual mineral types?**

1. National policy makes no reference to a preference of extensions over new sites. National practice guidance recognises the advantages and disadvantages of extensions over new sites, but stresses that each case must be decided on its merits. For these reasons we do not consider that there should be a **policy preference** of one type of proposal over the other, and whilst a majority of proposals will be extensions, our members are confident that they can successfully argue the merits of their sites whatever category they fall into. So we consider that the Local Plan should be neutral over the issue as the best reflection of national policy and guidance.

**Question 8: How important is it to maintain a geographical spread of sand and gravel quarries across the County (i.e. Idle Valley, near Newark and near Nottingham) to minimise the distance minerals are transported to markets?**

**Question 9: Would it be more appropriate to prioritise specific areas above others?**

**Question 10: Is it economical to transport mineral by river barge and if so should proposed quarries with the potential for moving sand and gravel by river barge be prioritised over other proposals?**

1. We consider that if resources allow, it is important to maintain a spread of workings in the areas mentioned. However, we are aware that future working in the Idle valley will be limited as resources decline. Clearly, the nearer one can get to market the more sustainable the aggregate resource is, so locating nearer to Nottingham also has SD advantages. The Newark area possesses the best resources for the future as they are more abundant and suffer from fewer strategic constraints. However, there are accessibility issues that may need to be overcome and it would greatly assist the industry in its future planning and investment decisions, to know what the views of the mpa are on this.
2. On this basis, we do not consider that one area should be prioritised over another.
3. We leave any economics of barge transport for our members to comment on individually. These facilities are very expensive to install and run, only apply to sites with easy access to the riverside, and require substantial investment at the receiving end as for rail depots. Our view is that whilst there are clear advantages to this form of transport, it should not form the basis of any judgment on the acceptability of proposals in isolation. Road transport of mineral will continue to predominate for the foreseeable future.

**Question: 11 Are you aware of any other issues relating to Sherwood Sandstone provision that should be considered through the Minerals Local Plan review?**

1. We have already answered this in relation to questions 4 & 5 above.

**Q12 Is there evidence to suggest that additional crushed rock reserves are required to meet demand in Nottinghamshire over the Plan period? If so please provide this evidence.**

**Q13 Are you aware of any other issues relating to crushed rock provision that should be considered through the Minerals Local Plan review?**

1. Demand for crushed rock is increasing and has returned to pre-recession levels across the country. We cannot comment on the reason why the site mentioned is not operational, neither do we have any evidence that more rock is required. However, no doubt following your call for sites, evidence may come to light of further need, and it would be up to any promoters of other sites to justify that.

**Question 14: Are you aware of any issues relating to alternative aggregates that should be considered through the Minerals Local Plan review?**

1. The role of recycling has in the industry's view reached a level where supplies will rise and fall with the level of construction activity. In its paper on Long-Term Aggregates Demand & Supply Scenarios 2016-30, the Mineral Products Association (MPA) said *"All supply scenarios described in this paper assume that recycled and secondary aggregates supplies grow in line with construction trends, not faster. The view is that the potential for recycling has already reached a high level, and that if further improvements are possible, these are expected to remain incremental in volume terms."*

**Question: 19 Are you aware of any issues regarding the provision of Silica Sand that should be considered as part of the Minerals Local Plan review?**

1. We agree that a criteria based approach to policy is the best solution for this important industrial mineral given it is national policy that a stock of permitted reserves of at least 10 years is required to support the level of actual and proposed investment. However, if further sites are promoted in the call for sites we would expect the County Council to take a sympathetic approach to need assuming environmental impact was acceptable.

**Question 20: Are you aware of any issues regarding the provision of industrial dolomite that should be considered as part of the Minerals Local Plan review?**

1. Clearly, the importance of this industrial mineral is recognised by the County Council and we have nothing further to add to the approach we have advocated for silica sand, except to say that since dolomite is a refractory product, it makes sense to treat it in similar terms to

cement and allow for a minimum stock of permitted reserves of at least 15 years to reflect the higher levels of investment involved.

**Question 21: Is there evidence to suggest that additional building stone reserves are required to meet demand in Nottinghamshire over the plan period? If so please provide this evidence.**

**Question 22: Are you aware of any other issues relating to building stone provision that should be considered through the Minerals Local Plan review?**

1. We agree that a criteria based approach to this mineral is justified because of its special qualities. In general, production of dimension stone is rising in the UK, not only for the repair of historic buildings and structures, but also for new-build projects. Although the industry has traditionally been small scale there are an increasing number of larger producers (most of whom are now MPA members) and we consider that restricting sites to being small, or for a local market or for only repair work, is not justified. NPPF policy does not restrict the development of dimension stone production; the description of the industry as small scale is meant to reflect its historic role and impact, but not its future development, for which the MPA considers there should be no policy restriction. The industry believes individual proposal should be treated on their merits in accordance with national policy and guidance.

**Question 25: Do you agree with the proposed development management policy areas? Are there any others that should be covered?**

1. We agree that the list of management policy areas is comprehensive, and we would ask that in formulating local policies, you do not merely repeat national policy, and that if you cannot improve upon the national approach then the Local Plan should defer to the wording of NPPF.

**Question 26: Are you aware of any issues relating to minerals safeguarding that should be considered through the Minerals Local Plan review?**

1. The summary of issues for mineral and infrastructure safeguarding is comprehensive and we would encourage you to closely follow the advice of the BGS in this matter, not only in respect of prior extraction, but also in respect of the equally important and often ignored, issue of sterilisation by proximity.

M E North

11/01/18

