

Planning Policy

From: Minerals and Waste [REDACTED]
Sent: 11 January 2018 11:33
To: Planning Policy
Subject: CONSULTATION RESPONSE: Nottinghamshire Minerals Local Plan Issues and Options Consultation
Attachments: Notts_LAA_Consultation_Response_14.8.17 (2).pdf

Dear Sir/Madam,

Thank you for consulting Lincolnshire County Council on the above document. Our response is as follows:

Q4: 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. / Q5: 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?

No to both questions. Lincolnshire County Council considers that, in relation to Sand and Gravel, the average 10 year sales figure is not an appropriate basis for forecasting future aggregate demand in Nottinghamshire. Accordingly, an alternative methodology should be utilised for Sand and Gravel.

The County Council's main concern is that the proposed approach significantly underplays the demand for sand and gravel in Nottinghamshire. This is due to a lack of recognition of the increasing disparity in cross-boundary movements of sand and gravel between Lincolnshire and Nottinghamshire.

In our letter dated 14 August 2017 to the East Midlands Aggregates Working Party (attached), the County Council raised concerns in relation to Nottinghamshire's Draft LAA (2017) (the document which now underpins the approach proposed in the Issues and Options document subject to consultation), and as such, our concerns still stand.

As outlined in the attached letter, it appears that in response to reduced levels of demand both during and following the recession, sand and gravel producers in the Trent Valley have rationalised their operations, focussing production in Lincolnshire and reducing operations temporarily in Nottinghamshire. This is reflected in sales data (see attached letter) which shows that imports of sand and gravel into Nottinghamshire from Lincolnshire have increased substantially in recent years, however this has not been adequately acknowledged in the LAA.

The increasing reliance on imports from Lincolnshire that appears to have taken place since the recession has depressed sales figures for Nottinghamshire and therefore basing future provision solely on 10 year average sales without having regard to this other relevant local information misrepresents and underestimates the demand for minerals in Nottinghamshire going forward. It will also serve to reinforce recent trends and therefore increase pressure on resources in Lincolnshire.

This may therefore lead to supply issues during the plan period if quarries in Lincolnshire are unable to meet any increased demand from shortfalls in Nottinghamshire, particularly when it is also noted in the LAA that there may be further pressure on the Trent Valley in the long term due to shortages in the Idle Valley. Furthermore, given the acknowledged extent of the sand and gravel resource within Nottinghamshire, there is no clear justification for continuing to rely on imports from Lincolnshire rather than making appropriate local provision within Nottinghamshire.

In summary The County Council therefore has concerns over the use of the most recent 10 year average as set out in the LAA because it believes the figure has been skewed by the recent increases in imports of sand and gravel from Lincolnshire, and which have temporarily depressed production in Nottinghamshire. This is a local factor that should

be taken into account when setting the level of provision to be made in the emerging Minerals Local Plan, and warrants a different approach to be taken in relation to Sand and Gravel.

It is recommended that the level of provision should be based on the assumption that sales in Nottinghamshire will return to a similar **proportion** of total sales in the East Midlands achieved prior to the recession.

Q8: 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?

The County Council considers that it is important to maintain, wherever possible, a geographical spread of sand and gravel quarries to ensure that they are best located in relation to their local markets. This helps to minimise the distance minerals are transported and also reduces reliance on imports from neighbouring areas.

Kind Regards

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14 August 2017

Carolyn Williams
Secretary
East Midlands Aggregate Working Party

(by email only)

Please reply to:

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Dear Carolyn

DRAFT NOTTINGHAMSHIRE AND NOTTINGHAM LOCAL AGGREGATE ASSESSMENT 2017

Thank you for your consultation dated 1 August 2017 on the draft Nottinghamshire and Nottingham Local Aggregate Assessment.

It is noted that the draft LAA (2017) proposes to significantly reduce the annual provision rate for sand and gravel compared with the proposals set out in the previous LAA (2016), which concluded that the 10 year average set out in the 2013 LAA would be a more robust method for setting the level of provision in the emerging Minerals Local Plan. The revised approach will reduce this annual provision rate from 2.58 million tonnes to 1.7 million tonnes, which is a very low rate compared with those prior to the recession.

Paragraph 5.5 of the LAA states:

"At the start of the monitoring period in 2007 sand and gravel sales in the East Midlands stood at 8.9 million tonnes before falling to 5.5 million tonnes in 2009 as a result of the recession. Since 2009 sales have steadily increased standing at 6.95 million tonnes in 2016. This is a small increase from 6.89 million tonnes in 2015"

Whilst this general statement is correct, it masks the variations in trends, particularly between Nottinghamshire and the East Midlands as a whole. In this respect, Nottinghamshire experienced a particularly sharp decline in sales from 2007 to 2009 and since then sales have shown very limited improvement. Indeed sales in 2016 were the same as in 2009. As a result, and contrary to what is stated in paragraph 2.3, production levels of sand and gravel in Lincolnshire have exceeded those in Nottinghamshire since 2009 (excluding the Sherwood Sandstone).

The draft LAA largely attributes the reduction in sales to the combined effects of both the recession and the fact that production from Finningley Quarry, which straddles the Nottinghamshire/Doncaster border, temporarily switched to Doncaster in those years. Whilst these are important matters, it is considered that there is another factor that needs to be taken into account: the recent changes in cross boundary movements of sand and gravel between Lincolnshire and Nottinghamshire, particularly in the Trent Valley. As you

are probably aware, two of the major sand and gravel producers in the Trent Valley have quarries on both sides of the county boundary. It appears that in response to the reduced level of demand for sand and gravel, these companies have rationalised their operations focussing production in Lincolnshire whilst at the same time reducing operations temporarily in Nottinghamshire. There are several indicators of this:

- Firstly, as you will be aware Lincolnshire is subdivided into three sand and gravel production areas: the Lincoln Trent Valley; Central Lincolnshire; and South Lincolnshire. The Annual Monitoring Report 2016 shows that sales in the Lincoln/Trent Valley have been surprisingly buoyant compared with the other production areas, suggesting that it may be compensating for reduced production in Nottinghamshire.
- Secondly, prior to the last full Aggregate Mineral Survey in 2014, previous surveys have indicated that sand and gravel movements between the two Counties have largely cancelled each other out. However, in 2014 nearly 300,000 tonnes of sand and gravel was exported from Lincolnshire to Nottinghamshire (see Lincolnshire LAA May 2017). In contrast, exports from Nottinghamshire to Lincolnshire are stated in the draft LAA as falling within the 10,001 to 100,000 tonne band, making Lincolnshire a significant net exporter of sand and gravel to Nottinghamshire during that year.
- Finally the draft LAA, acknowledges the delay to the implementation of a permitted quarry in the Nottinghamshire Trent Valley (Sturton le Steeple), again suggesting that the company may be concentrating production in Lincolnshire.

Whilst the reduced demand within this general area has led to a decline in sales in Nottinghamshire (and paradoxically an increase in sales in the Lincoln/Trent Valley Production Area), this situation could rapidly go into reverse if demand starts to rise and, as a result, mineral operators step up production or re-open workings in Nottinghamshire.

The draft LAA acknowledges that production in the Nottinghamshire Trent Valley could rise as a result of the A1/A46 junction improvements near Newark estimated to start between 2020 and 2025, and in the longer term to supply markets currently served by output from the Idle Valley. There is therefore a real danger that basing the level of future provision on the latest 10 year average sales could, and probably will, significantly underestimate future demand. As a result, if the level of provision made in the emerging Minerals Local Plan is based on the current approach set out in the draft LAA, it could be found to be unsound. Alternatively, should it be adopted it could cause supply issues if the quarries in Lincolnshire are unable to meet any increased demand arising from shortfalls in Nottinghamshire.

This Authority therefore has concerns over the use of the most recent 10 year average because it believes the figure has been skewed by the recent increases in imports of sand and gravel from Lincolnshire, and which have temporarily depressed production in Nottinghamshire. This is a local factor that should be taken into account when setting the level of provision to be made in the emerging Minerals Local Plan. In addition, if production at the Finningley Quarry is likely to be switched back to Nottinghamshire in the short to medium term, this should be factored into the provision rate set by the LAA.

It is considered that the approach used in the previous LAA (2016) is more likely to provide a sounder way of calculating the level of provision that needs to be made in the emerging Minerals Local Plan.

Yours sincerely

Minerals and Waste Policy Team Leader

