

Northamptonshire Minerals and Waste Local Plan Examination

Matter 4- Provision to be met for Minerals

Statement by Northamptonshire County Council

Issue M1

Does the Plan make provision for a steady and adequate supply of aggregates?

- 1.1 The Plan does make provision for a steady and adequate supply of aggregates. The Plan sets out both the total provision for the plan period and an annual provision to be made for sand and gravel and crushed rock extraction (Policy 1) on the basis of NPPF guidance and also identifies allocations from where this provision will come from.

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Issue M2

Is the quantity of aggregate identified to be supplied during the Plan period the most appropriate, taking into account sales data and all other relevant information, including economic forecasts and the planned development in the county and adjoining areas in the Plan period, and the contribution that may be made by secondary and recycled aggregate?

2.1 It is considered that the amount of aggregate identified to be supplied during the plan period is the most appropriate. Provision in the Plan is based on guidance in the NPPF that mineral planning authorities should calculate provision on the basis of average aggregate sales over a ten year rolling period and other relevant information as set out through the Local Aggregate Assessment (LAA).

Sand and Gravel

2.2 Provision for sand and gravel is based on a ten year annual average sales for the years 2001 to 2010. This is the ten years leading up to the start of the plan period for the Plan, being 1 January 2011.

2.3 Sand and gravel sales have been declining steadily in Northamptonshire over this ten year period and a reducing provision for sand and gravel in the partial review is not therefore a surprise. The last two apportionments for Northamptonshire as agreed at regional level were both on a downward trajectory.

2.4 The 2001 to 2016 guidelines issued by the government in June 2003 resulted in a regionally agreed figure for Northamptonshire of 0.97 mt annually and this was reflected in both the Minerals Local Plan adopted in 2006 and the MWDF Core Strategy adopted in 2010. This figure was a reduction on the previous apportionment for Northamptonshire of 1.03 mt annually.

2.5 The guidelines issued by the government and agreed at regional level in 2009 saw the figure for Northamptonshire reduced to 0.78 mtpa. The basis for the calculations that led to this figure was supported by County Council officers. The first iteration of the apportionment was based on an alternative of either three or five year sales annual average sales figures and this would have seen a significant decline in the apportionment figure for the county. Officers had concerns that too steep a decline in the apportionment level could potentially lead to an increase at the following apportionment and therefore preferred a less steep decrease that would be less likely to lead to a subsequent increase at the following apportionment. Two changes were therefore made across the region: firstly, the period on which sales figures were to be based was increased to seven years across the region – this had the benefit of now picking up the high annual averages in 2001 and 2002 in Northamptonshire – and secondly 0.11 mtpa was re-assigned from the increased Nottinghamshire apportionment to the Northamptonshire apportionment- this was to be based on the argument that sites identified in the Nene Valley in the adopted Local Plan (and the emerging MWDF) would shortly come forward for extraction and that this could justify this re-apportionment between Northamptonshire and Nottinghamshire.

- 2.6 The 2009 figure of 0.78 mtpa for Northamptonshire was included in the draft Regional Strategy for the East Midlands, but never became an adopted figure as that plan's progression was abandoned after the change of government in 2010. Instead the partial review was to move forward as the basis for its provision the NPPF guidance on ten year annual average sales.
- 2.7 A ten year figure based on sales would be 0.5 mtpa if the ten year period was to be taken as being 2001 to 2010. If it was to have been 2002 to 2011 this would have been reduced further to 0.45 mtpa (and for 2003 to 2012 it would further reduce to 0.39 mtpa). A ten year period from 2001 to 2010 was thus more appropriate as it would be less of a decline from the 0.78 mtpa figure. It would also conveniently cover the 10 year period immediately prior to the new plan period commencing on 1 January 2011.
- 2.8 It was also considered that adjustments such as that taken in 2009 to try to balance out rises and declines in the region was no longer appropriate. There was, however, the opportunity to make adjustments based on local circumstances. The growth of the county could be considered a factor but this growth as set out in the MKSM Sub-Regional Plan was being pared back in the Core Strategies that were being taken forward in the wake of the Sub-Regional Strategy abolition. However, production of sand and gravel had declined significantly in the first half of the previous decade despite there having been a significant increase in housebuilding over this period. In other words even if the growth proposals had remained high this did not guarantee in any way a corresponding increase in production.
- 2.9 Adjusting provision by increasing provision by 10% could have been considered, as suggested by some elements of the industry at the Aggregates Working Party (AWP), to give some flexibility, but NPPF guidance is that the basis is for a ten year annual average provision and not a ten year annual average provision plus 10% for 'flexibility'. Furthermore minerals planning authorities in their LAAs were largely tending to go with 10 year figures from 2002 and that this was creating for them lower provision figures than 10 years from 2001- therefore if Northamptonshire was do the same with a ten year average from 2002 but with a 10% upwards adjustment it would still be a lower figure than the 0.5 mtpa that was being proposed in the partial review. In other words you can bring in further considerations and include adjustments but it does not make anything more firmer and more robust than a simple ten year annual average provision from the ten year period before the plan period commenced does - and this also has the added advantage of simplicity too. Indeed the Minerals Products Association itself, in a response to the draft document on guidance on the preparation of LAAs (as referred to in the letter by a number of East Midlands minerals planning authorities to the AWP- see Exam Lib Ref 903), states: "in the name of good practice, the guide should strongly promote the idea of a simple 10 year average as the basis for LAAs".
- 2.10 It is also the case that annual sales figures for sand and gravel has not been above the 0.5 mtpa Plan provision since 2005 and declined steeply through 2006-8 to almost a third of 0.5 mtpa by 2009. It is acknowledged that there has since been increases in 2010, 2011 and a larger increase to 0.4 mtpa in 2012, but even the 2012 sales figure remains 20% below the proposed provision figure.
- 2.11 In looking to the next few years and likely production, the permitted sites at Earls Barton Spinney (Breedon Aggregates) and Earls Barton West (Hanson) that have both been nominally worked in the past year to keep their permissions alive could commence full production within the next year or so (but progress by both companies depend on agreement from their respective management boards). If this was to occur, and the Council is supportive of this happening as soon as possible, then these two adjacent sites would be expected to start to broadly supply around 0.42 mtpa (Earls Barton

Spinney is proposed to average around 0.18 mtpa over seven years and Earls Barton West proposed to be 2.4 mt in total over 10 years). However, over the next couple of years it is expected that both the Hanson site at Bozeat and the Warmington extraction will be worked out. Unless new applications for sand and gravel are to imminently come forward, be approved and implemented by 2017 (and there is normally at least a two to three year period from pre-application discussions to working commencing) then by 2017 the two Earls Barton sites would likely be the only sand and gravel production units in the county. On that basis annual sales would be expected to be below 0.5 mtpa in 2017 and therefore not only would this mean that a 10 year annual sales average would not have the necessary sales peaks to enable this to be above 0.5 mtpa at any stage in the next few years but a 3 year sales average would also struggle to do so as well.

2.12 It is noted that some elements of the industry are now suggesting that the reason for the decline in production in the county has been related to what they term former policy blocks. However the 'policy block' they refer to, that of seeking to restrict extraction from the Nene valley and moving to the glacial deposits, that came in in the mid to late 1990s never actually saw the ending of allocations or permissions in the valley. Indeed rather than a policy block it would more appropriately have been described as a 'locational strategy' and with sites in the exploited parts of river valleys (eg Nene, Ouse) being supported. These, along with glacial sites promoted by the industry, were adequate to meet requirements.

2.13 The start of the MWDF process in 2006 saw us re-open the debate and there was no restriction on where sites could be proposed. In fact the industry did not come forward with new river valley sites with limited exceptions: a sand and gravel site came forward in the Ouse Valley at Deanshanger and this was included in the Plan, as did the Anglian Water site at Ecton/Earls Barton which was in the 1997 but not the 2006 Plan and this was also allocated in the MWDF; furthermore a crushed rock site on the side of the Nene Valley at Ringstead was also put forward and included as an allocation- this has subsequently been granted permission and extraction is to commence imminently. Only one site, at Denford in the Nene Valley, was proposed that was not taken forward in the MWDF. It should be noted that extraction has also been permitted and implemented in the Nene Valley at Warmington (permission 2004) and at Lilford Lodge Barnwell (permission 2012) and these have actually been important production drivers in the past couple of years.

2.14 It is therefore not correct to imply that there has been a rigid 'policy block' operating for years that has only been released since the adoption of the MWDF Core Strategy in 2010. It should also be noted that if there was a concern in respect of a 'policy block' that was preventing sites coming forward then it would have been expected at the start of the partial review process for there to be industry support for the identification of new sites. However, no such support was forthcoming and indeed the Minerals Products Association specifically supported the intention to not review sites, as did Lafarge.

Crushed rock

2.15 The 2003 guidelines translated into a provision figure for Northamptonshire of 0.39 mtpa (a reduction from 0.42 mtpa) and the 2009 apportionment for the county would have been a reduction to 0.3 mtpa. However the ten years annual sales provision for crushed rock did not show the same strong downward trajectory as for sand and gravel and when the Council commenced the partial review production figures were on an upward trajectory and not too far off the 0.3 mtpa figure (see Figure 7 of the LAA). Ten year annual average provision for 2001 to 2010 was 0.33 mtpa; for 2002 to 2011 it was 0.32 mtpa.

- 2.16 It was considered that because the difference between 0.33 and 0.39 mtpa was not too significant, and there did seem to be continuing interest in progressing crushed rock extraction in the county, that the previous crushed rock apportionment from the MWDF Core Strategy could be carried forward into the partial review Plan without looking unachievable.
- 2.17 It is noted that whilst the provision figure for sand and gravel is a simple ten year rolling sales average, the crushed rock provision is the continuation of the provision from the adopted MWDF Core Strategy. However having different approaches for sand and gravel and crushed rock is considered to be appropriate and it shows that the Council is not taking a rigid approach to the use of ten year average sales figures as set out in the NPPF, but going above that when it considers it to be justified.
- 2.18 The most recent sales figures (2012) have seen a fallback in crushed rock provision from 0.24 mtpa in 2011 to 0.14 mtpa in 2012. This significant decline makes the 2003 to 2012 ten year sales average 0.29 mtpa.
- 2.19 However, the imminent start of extraction at the allocated site in Ringstead that was granted permission in late 2012 is expected to move the trajectory upwards again. At Ringstead it is proposed that extraction will take place over approximately fifteen years, averaging 0.15 Mt per annum, so this site alone would provide 38% of the annual provision for crushed rock if sales were to be as anticipated. In addition the Collyweston/Duddington and Harlestone quarries are expected to continue production as would smaller production units elsewhere. It is acknowledged that production from these units would be such that annual sales would not reach either the annual Plan provision either on a 10 year or 3 year annual average sales basis. However the Wakerley allocation has received planning permission subject to a s106 agreement (and which is due for imminent signing). Infrastructure requirements are costly here and the permission would allow ten years for the site to be implemented, but if it did then production of 0.3 mtpa would soon start to affect 10 and 3 year annual sales averages. The Council therefore considers that Wakerley has to be factored into the crushed rock provision figure and thus makes 0.39 mtpa a not unachievable figure.

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Issue M3

Does the Plan make appropriate provision for the production of aggregate from secondary and recycled sources?

- 3.1 The Plan continues with the same approach from the adopted MWDF Core Strategy in that it contains a policy encouraging facilities for secondary and recycled aggregates. It is not considered that any alternative approach should be pursued through the partial review. It is also noted that there were no representations on this matter suggesting any alternative approach. Since adoption of the MWDF Core Strategy permissions for aggregates recycling have been granted at Sywell Shooting Ground (January 2011), Pitsford Quarry (December 2013) and at Boughton Quarry (permanent permission at a temporary facility May 2012).