



**South  
Derbyshire**  
District Council

The Development Plan Team,  
Derbyshire County Council,  
Environmental Services Department,  
Shand House,  
Dale Road South,  
Matlock,  
DE4 3RY

## Head of Community and Planning

Civic Offices, Civic Way,  
Swadlincote, Derbyshire DE11 0AH

[www.south-derbys.gov.uk](http://www.south-derbys.gov.uk)

**Please ask for:** Ian Bowen  
Phone: (01283) 228717  
Fax: (01283) 595850  
Typetalk: (0870) 2409598  
DX 23912 Swadlincote  
E-mail: [Kevin.exley@south-derbys.gov.uk](mailto:Kevin.exley@south-derbys.gov.uk)

Our ref:  
Your ref:

Date: 15 April 2012

Dear Sir/Madam

### **DERBY & DERBYSHIRE MINERALS PLAN - LOCAL AGGREGATE ASSESSMENT**

Thank you for consulting South Derbyshire District Council on the above. Please see below an officer response which is made without prejudice to any formal determination which may be made by the Council.

The need for your Authority to identify a 7 year landbank for land won sand and gravel as set out in paragraph 24 of the Guidance on the Managed Aggregate Supply System<sup>1</sup> is recognised and further acknowledge that this should be based on a forecast of the demand for aggregates based on the average of 10-years sales data and other relevant local information. These include an analysis of all aggregate supply options, as indicated by landbanks, mineral plan allocations and capacity data and an assessment of the balance between demand and supply, and the economic and environmental opportunities and constraints that might influence the situation as specified in paragraph 6 of this guidance.

Having reviewed the Local Aggregates Assumption (LAA), the annual apportionment you have identified in respect of sand and gravel (1.35mt) is considered to be reasonable based on the information presented in the report for the purposes of identifying the landbank for sand and gravel over the outlined seven year period\*.

However, given the uncertainty which remains in the evidence, it is not considered prudent to extrapolate an inferred sand and gravel requirement as far ahead as 2030 given the lack of certainty regarding secondary recycled minerals and the developments assumptions laid out in the document. (See Appendix 1 setting out more detailed representations attached).

It is therefore suggested that any reference to indicative requirements for the outlined Plan period (i.e to 2030) included in the Local Aggregates Assessment and based on the figures for the highlighted land bank period be removed from the document at page 26. It seems appropriate to deal with longer-term minerals requirements through the Mineral Local Plan once further information has been collected and certainty about longer-term requirements further refined. This Authority will make formal representations at that stage.

<sup>1</sup> Guidance on the Managed Aggregate Supply System, Department for Communities and Local Government October, 2012



Yours faithfully

Kevin Exley  
Planning Policy Officer (Sustainability)



**Appendix 1 (re. Local Aggregates Assessment)**

In respect of the development assumptions, historic trends seem to indicate that the supply of primary sand and gravel has not exceeded 1.35mt. since 2005. Within the period 2005-07 housing completions in the Derby Housing Market Area (HMA) were running substantially ahead of those likely to be set for the Plan period over the coming fifteen years.

By way of example, the emerging growth strategy for the HMA indicates the need to deliver 1,685 homes annually to 2028. In 2006/07 completions in the same authorities reached 2,034 homes, whilst in 2007/08 they peaked at 2,456. Similarly employment land completions within South Derbyshire alone were at 26ha in 2006 and 16ha in 2007 - well above the likely required annual delivery rate for the Derby HMA as a whole (13.65ha) for the period up to 2028. Given the buoyant economic conditions it is likely that other local Authorities were exceeding their housing requirements also.

Despite elevated levels of growth in this period, primary sand and gravel extraction seemed to continue its long-term decline perhaps suggesting external supplies, or secondary/recycled aggregates were contributing significantly to needs during this period of high growth. This is illustrated in table 2 of the LAA below:

**Table 2: Sales of Sand and Gravel in Derbyshire 2001-20102 (million tonnes)**

2002	03	04	25	06	07	08	09	10	11	Ave
1.53	1.48	1.36	1.34	1.20	1.22	1.10	0.91	1.04	1.1	1.23

Given the above, it is clear that long-term need for primary sand and gravel has fallen in recent years (even when the economy was buoyant and housing and employment completions were well ahead of the annual requirements now being set in emerging plans).

Nonetheless it is likely that some of fall in demand (and hence extraction) in the latter part of the period has been attributable to the depressed state of the economy (and will no doubt recover in due course). However given the difficulty in distinguishing the fall attributable to the long-term structural changes to sand and gravel use from those related to the recent economic conditions, it would seem sensible to exclude any consideration of the period beyond that necessary seven year land bank period. This view is reinforced by the absence of further information on the likely rates of re-use of secondary and recycled material and improvements to construction technologies suggested in the LAA.

Furthermore, making allowances for one-off infrastructure projects and using this as a basis to uplift the historic delivery average of 1.23mt per annum to a requirement of 1.35mt, seems unnecessary. A number of major infrastructure projects have taken place since 2002 (such as M1 widening, completion of Nottingham Express Transit line 1 etc). Such one-offs will already have been accounted for in the actual figures. Making allowance for future schemes such as the strategic rail freight interchange facility to the south of Derby (for which no application has yet been submitted and may not be consented if any application is forthcoming) also seems unnecessary as at present and should not be used as a basis for justifying elevated material requirements beyond the landbank period.

