

North Yorkshire Minerals & Waste Joint Local Plan

Examination in Public – Hearings Statement by W Clifford Watts

Matter 1 – Minerals (Aggregates in General)

Issue: Whether the vision, objectives and strategic minerals policies seek to provide a sufficient supply of locally and nationally important minerals in an efficient and sustainable manner and whether the proposed allocations are the most appropriate

Aggregates in general

14. Give a very brief overview of how aggregates requirements have been determined. Are there any outstanding issues with the methodology used?

15. Should references to “minimum” landbank time periods be changed to “at least” to be consistent with national policy? (NPPF paragraph 145)

W Clifford Watts Statement

1. In terms of **Question 14** we think the LAA has done a fairly good job at analysing the future requirements of aggregates, although flexibility for market distortions created by the planning system (i.e. large landbanks accruing to a few operators) is required and understanding by the mpas of the needs of industry. We will confine our following comments to crushed rock.
2. Paragraphs 99 & 100 of the LAA address crushed rock issues. The methodology for determining sand and gravel requirements (dubbed the North Yorkshire method which the author had a hand in developing as a representative of the MPA at the time) has not been applied to crushed rock because of the wider range of uses for rock and the absence of data to support forecasting plus the greater comfort of larger landbanks. Table 25 gives the indicative requirements for crushed rock and we do not disagree with the overall assessment of about 6.3 Mt of Jurassic limestone demand for the plan period. However, we do not agree that there is no need to make further provision. The methodology should also analyse which sites have ample reserves and whether productive capacity is likely to be sustained. In particular, there is a need to make sure that sites which have invested heavily in downstream products, as W Clifford Watts has done, continue to be able to serve their communities.
3. However, we do agree that the overall supply of limestone is capable of sustaining likely sales to 2030, and that Magnesian limestone capacity needs to be safeguarded. However, we have two caveats. First, if it is considered that limestone should increasingly substitute for sand and gravel in concrete applications, then the capacity of limestone output may be constrained and it would

clearly lead to a less than sustainable outcome considering the greater distances that mineral would need to be hauled to market. Second, the mpas have not given sufficient attention to the need to maintain productive capacity for Jurassic limestone on the mistaken belief that since the output is small in comparison with other limestone sources, it is not a strategic material. However, we are grateful for the statement in para 100 of the LAA that states *“Extensions to working areas (where possible) may also be beneficial at some sites in order to help maintain production capacity, unless output at other remaining sites could be increased.”*

4. However, the mpas' preferred alternative to a strategic allocation of Jurassic limestone is to refer operators to Policy M10: Unallocated extensions to existing quarries. Whilst this would appear to be a concession, the company is in no doubt that any reasons advanced for non-allocation would also be advanced to reject an application for an extension if this policy were to be relied on in a future application. So in our view is that it is no help at all.
5. We do not necessarily agree that dormant sites can overcome the identified capacity problems or that it would be desirable for them to do so. This is not a methodological matter so is not explored further but we will pick up on this point later in the statements.
6. In respect of **Question 15**, it is generally better to stick to the terminology in national policy documents if it is possible to do so, and there could be a nuance of meaning that suggests that minimum landbanks might focus attention just on that figure whereas 'at least' suggests an approach that focuses attention on 'being more than', and in the context of aggregate mineral landbanks where many mpas prior to NPPF used to interpret 'minimum' as 'maximum'. This led PGG to clarify that 'there is no maximum landbank' to avoid this very situation. Now the battle has moved on and provision 'based on a 10 year rolling average' is commonly interpreted as 'only the 10 year average', but that is another story. We acknowledge that until a review of the Local Plan the denominator of the equation for calculating landbanks will not change, but our experience elsewhere is that political pressure may once again expect that provision should if possible, be on a downward trend, and if possible be the very minimum needed to meet national policy. The industry do not believe that this is a profitable approach for the long term planning for minerals.