

# **EARSHAM GRAVELS LTD**

## **EXAMINATION OF THE NORFOLK MINERALS AND WASTE LOCAL PLAN**

### **HEARING STATEMENT (REP 99082) CALCULATION OF FORECAST NEED FOR SAND AND GRAVEL**

**ON BEHALF OF EARSHAM GRAVELS LIMITED**

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## **Hearing Statement (Rep 99082) :** **Calculation of forecast need for sand and gravel**

### **Main Matter 3 – Whether the Plan makes adequate provision for the steady and adequate supply of aggregate and industrial minerals.**

#### **In response to Q2.**

1. As regards national policy, the NPPF gives no specific guidance as to the degree of flexibility a Mineral Planning Authority should allow when calculating aggregate provision other than to plan for a ‘steady and adequate supply of aggregates’.
2. It is therefore left to each individual authority to make a judgement as to whether flexibility should be made in addition to calculated provision based on average 10-year aggregate sales and if so, the amount of additional provision.
3. In the case of Norfolk CC, a 10% buffer (0.137 million tpa) has been added to the 10-year average in the calculation of forecast need during the Plan period. In the case of Suffolk, a ‘safety margin’ of 20% has been built into the calculation. Essex has taken an alternative approach by identifying two allocated ‘Reserve Sites’ in addition to their normal ‘Preferred Sites’. These ‘Reserve Sites’ will only come forward if the aggregate landbank falls below 7 years. The Preferred Sites contain a total aggregate reserve of 31.824mt and the two Reserve Sites a total of 9.0mt, representing an additional provision of 28.3%.
4. Using the examples of Suffolk and Essex it can be seen that the additional provision made by Norfolk is significantly less. As to which approach is correct will very much depend on future movement in the respective annual production figures but clearly the approach taken by Suffolk and Essex is more cautionary and could be seen as giving greater recognition to guidance in the NPPF to provide for a ‘steady and adequate supply of aggregates’.
5. Although only over a 2-year period it is useful to see how quickly a forecast and reality can diverge. In calculating aggregate provision over the Plan period, the draft Plan bases the calculation on average aggregates sales over the 10-year period between 2011 to 2020 inclusive, arriving at a figure of 1.369mt. The most recent Local Aggregates Assessment for 2022 similarly calculates average aggregate production over the 10-year period but in this case between 2013 to 2022 inclusive, arriving at a figure of

1.413mt. The latter figure using more recent data represents an increase of 3.2%, equivalent to 1.6% annually.

6. The Plan is intended to run until 2038 or another 14.5 years from today. With a consistent increase in annual sales of circa 1.6% this would translate to a total increase of 23.2% over the Plan period and so well in excess of the flexibility offered by the draft Plan.
7. Although the consistent increase in sales envisaged above may not arise it does illustrate how quickly a forecast can diverge from reality. In the view of the Respondent, the Plan should adopt a greater degree of flexibility based on the latest available figure for 10-year average sales, i.e. 1.413mt.
8. The Respondent would ask the Plan be amended to adopt a minimum 20% buffer. This calculates as:  
  
 $1.413\text{mt} \times 0.2 = 0.283\text{mt} \times 14.5 \text{ years} = \mathbf{4.098\text{mt}}$ .
9. A figure of 4.098mt should therefore be added to the aggregate provision made in the Plan.