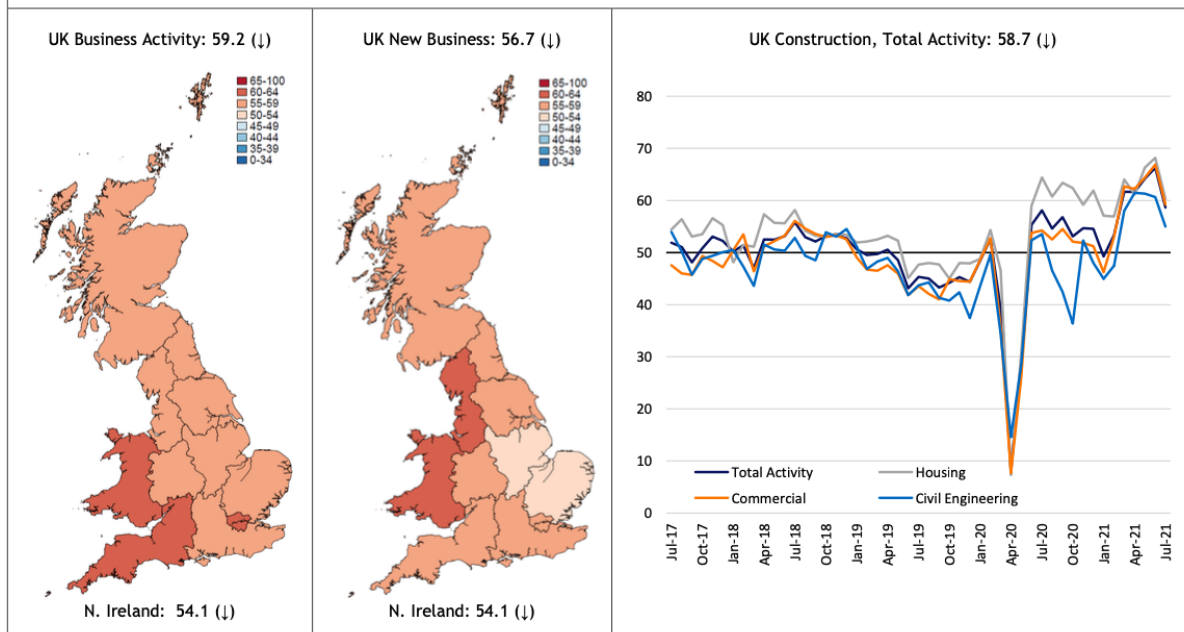


**Matter 3 Whether the Plan makes adequate provision for the steady and adequate supply of aggregate minerals**

**Q 3.3**

1. The level of provision made in Policy M3 relates to the ‘rate’ (tonnage per annum) derived in the 2019 Local Aggregates Assessment. This is based on the 10 year average of sales, which is taken as being the ‘forecast of demand’ without any adjustment for ‘other relevant local information’ (ref PPG Paragraph: 062 Reference ID: 27-062-20140306).
2. While the difficulties of producing more sophisticated and meaningful ‘forecasts’ of demand at local level is well understood, with the absence of up-to-date national *Guidelines* for aggregate provision not helping, the Policy should provide more flexibility for provision (and supply) to increase and not be constrained should demand demonstrably increase.
3. The most recent LAA (Examination doc HS83) shows that the most recent 10 year average of sales is 0.635mtpa. The justification for not increasing the ‘LAA rate’ is given in the LAA is ‘the current recession and uncertain economic recovery period’ (HS83, page 4).
4. The MPA produces a monthly ‘Economic and Market Briefing’ to its members This is sometimes also shared with Aggregates Working Parties as it helps to provide an up-to-the-minute picture of national and regional trends. The most recent edition (August 2021) reports continued strong growth in demand (UK) for minerals and mineral products, including aggregates with sales at record highs. These trends reflect growth in construction activity - the extract below illustrates the impact of Covid lockdown and the strong recovery especially in 2021:

1. Purchasing Manager Index (PMI\*), July 2021. Source: IHS Markit/CIPS.  
 \*An index <50 indicates contraction, 50 no change, >50 growth. Arrows show the direction of the monthly change.



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5. The Construction Product Association forecasts that construction output is likely to rise by 13.7% in 2021 and 6.3% in 2022. While forecasts are inevitably wrong, the direction of travel is clear. While this data is at UK level, it also includes a regional breakdown indicating growth in the South East and there is no reason to consider that the Plan area would not reflect this overall trend.
6. This information serves to illustrate that while the first Covid lockdown had a dramatic impact on construction and demand for aggregates, it was short-lived and that pent up demand led to a rapid recovery which is continuing.
7. While including the LAA rate in Policy M3 helps to provide a basis for future provision and clarity over the basis for planning and permitting of reserves (Policy M4 clause 3b), there is a risk that using a figure from one (old) LAA and not updating this to reflect more recent figures due to 'uncertainties' could lead to under-provision.
8. The inclusion of a LAA rate figure to 3 decimal places is also spuriously accurate. It would be more prudent and helpful to round up the figure for provision, which would also provide some additional flexibility. This would then require an increase in the level of overall provision required throughout the Plan period and to maintain the minimum levels of landbanks required.
9. Clause 3b of Policy M4, which states that new reserves at sites not included in clauses 1 and 2 will only be permitted if they are needed to maintain the landbank. PPG makes it clear that *'there is no maximum landbank and each application for minerals extraction must be considered on its own merits regardless of the length of the landbank. However, where a landbank is below the minimum level this may be seen as a strong indicator of urgent need.'* (084 Reference ID: 27-084-20140306). This clause should be deleted to provide necessary flexibility and to comply with national guidance,
10. The 'maintenance' of a minimum landbank of at least 7 years throughout the Plan period means just that - that there is also a need to have a landbank of at least 7 years' supply in place (and so 'maintained') at the end of the Plan period in 2036, requiring further provision to be made in the Plan, which would be c.4.5mt based on a rounded and updated LAA rate of 0.64mtpa.
11. Finally, the supporting text should also recognise that the annual rate of supply is not solely determined by maintaining a minimum landbank, but ensuring that there is sufficient capacity to supply (get the material out of the gate) from permitted sites.