

Mineral Planning Authority response to query raised at 14th February 2019 Hearing into AS27 Land at Horton Heath.

At the Hearing into AS27 Land at Horton Heath on 14th February 2019 queries were raised regarding sand and gravel sales and reserves figures - the query was clarified on 21st February 2019 as follows:

The figures included at paragraph 3.4 of the Mineral Sites Plan (pre-submission draft) dated December 2017 are different to the figures included in the Statement produced for the hearing into site AS27.

Reserves between 2016 and 2017 seem to have fallen by over 1million tonnes, suggesting that a higher allocation will be needed. However, the amount stated to be required through site allocations has fallen from 11.87 to 9.59 million tonnes with no explanation of why the figures differ. On the basis that both sets of figures claim to be based on the end of 2017 figures, we expected these figures to be the same.

Response from Mineral Planning Authority:

1. The figures in the green box following paragraph 3.4 of the Pre-Submission Consultation Draft Mineral Sites Plan are based on sand and gravel sales and reserves figures collected for the year **2016**. The reserves figure indicates the permitted reserve at the end of 2016.
2. The figures for the MPA statement prepared for the AS27 Hearing are based on the **2017** figures, including the permitted sand and gravel reserves at the end of 2017.
3. The permitted reserves have indeed fallen by approximately 1 mt - the reserves at the end of 2016 were 13.6 million tonnes (mt) and at the end of 2017 were 12.6 mt.
4. Between the end of 2016 and the end of 2017 some 800,000 tonnes of sand and gravel were permitted, offsetting the fall in reserves.
5. There are various ways of applying these figures to estimate the landbank, and give an indication of how many sites need to be allocated in the Mineral Sites Plan to meet demand during the Plan period.

The Pre-Submission Consultation Mineral Sites Plan Figures

6. The figures included at paragraph 3.4 of the Mineral Sites Plan (pre-submission draft) dated December 2017 are as follows:

- These figures are based on existing reserves as reported at the end of **2016** - 13.6 mt.
- The MPA estimated, based on the reported sales figures, that by the time the Plan was (at that time) expected to be adopted the reserves would have fallen to approximately 10.78 mt.
- The annual provision figure was 1.51 million tonnes per annum (mtpa) and the amount to be provided was calculated as follows: 15 years x 1.51 mt = 22.65 mt
- The estimated reserves figure of 10.78 mt was subtracted from the amount to be provided 22.65 mt giving an estimated figure of **11.87** mt to be provided through allocations.

7. An alternative way of presenting the figures, not using any estimations, is:

- Reserves at the end of 2016: 13.6 mt
- Amount to be provided: 15 x 1.51 = 22.65
- Amount to be provide through allocations: 22.65 - 13.6 = 9.05 mt

8. While not relying on any estimations and therefore potential inaccuracies, this approach does not take into account declining reserves.

The AS27 Hearing Figures

9. The figures presented in the MPA statement for AS27 Land at Horton Heath (MSPHD AS27 - 05) were intended to be a snapshot using the most recent info held by the MPA, and were based on the second approach of the two set out above.

- The MPA hold figures for sales and reserves in **2017**.
- Reserves at the end of 2017 were 12.6 mt
- Amount to be provided $1.48 \text{ mt} \times 15 = 22.2 \text{ mt}$
- Amount to be provided through allocations: $22.2 - 12.6 = \mathbf{9.6 \text{ mt}}$
- 'Surplus' figure provided by proposed allocations was calculated as follows:
 $9.6 \text{ mt (to be provided through allocations)} - 14.3 \text{ mt (estimated yield of proposed allocations)} = + 4.7 \text{ mt 'surplus'}$

10. Using the alternative approach involving estimation of sales and current reserves, which is the approach expected to be included in the revised Mineral Sites Plan, gives the following:

- Reserves at end of **2017**: 12.6 mt
- MPA estimated sales from the end of 2017 to end of June 2019, when the Plan is expected to be adopted = approximately 1.9 mt
- The annual provision figure was 1.48 million tonnes, so the amount to be provided is
 $1.48 \text{ mt} \times 15 = 22.2 \text{ mt}$
- Taking into account permissions in this period, sand and gravel reserves at end June 2019 are estimated to be 11.5 mt.
- Amount to be provided through allocation = $22.2 \text{ mt} - 11.5 \text{ mt} = 10.7 \text{ mt}$
- 'Surplus' figure provided by proposed allocations was calculated as follows:
 $10.7 \text{ mt (required to be provided through allocations)} - 14.3 \text{ mt (estimated yield of proposed allocations)} = + 3.6 \text{ mt 'surplus'}$

11. Adding up the potential yields of the proposed allocations (prior to the 14 February Hearing i.e. not including AS27) gives a total of 14.33 mt
12. Subtracting the figure of 14.33 mt from the amount to be provided gives a 'surplus' figure of either + 4.7mt (using the approach set out in the MPA statement MSPHD AS27 - 05) or + 3.6 mt using the approach of estimating the reserves at the time of adoption.
13. One approach uses estimations which could be inaccurate; one approach uses actual figures, which become out of date. Both indicate that the proposed allocations, excluding AS27, do provide a surplus of aggregate over the Plan period.

Dorset County Council

28 February 2019