
Independent Examination of the Derbyshire and Derby Minerals Local Plan

Updated Capacity Assessment (April 2026)

Derbyshire County Council and Derby City Council Response

Updated Capacity Assessment (Sand and Gravel) (Summary)

1. Key Points Arising from the from the MLP Examination in May 2025

Key points identified by the Inspector were that:

- Plan Period is 2022-2038;
- The Vision needs to reflect longer term need for the landbanks;
- Plan is based on 2022 LAA not 2024, so need to update the LAA and update the figures used in the Plan;
- Modification is required for Sand and Gravel, including potentially the allocation of an additional site or sites; and
- A 10% uplift required because output is increasing (using LAA figures);
- Need to assess how long left in existing permissions/quarries, i.e. the productive sites in the Plan Area.

2. Sand and Gravel Requirement

The sand and gravel requirement over the plan period has been determined on the basis that the Plan Period is 2022-2038 (17 years). The Sand and Gravel requirement identified in the Pre-Submission Draft Plan is 15.81 million tonnes (Policy SP4) based on a provision rate of 0.93 million tonnes x 17 years, i.e. 0.93 millions tonnes x 17 = 15.81 million tonnes.

This is reflected Policy SP4 of the Pre-Submission Draft Plan which states:

POLICY SP4: THE SUPPLY OF SAND AND GRAVEL

To meet identified levels of need for sand and gravel over the Plan period from 1 January 2022 to 31 December 2038, the continued working of existing reserves, together with provision at additional sites, at an annual minimum rate of 0.93 million tonnes will ensure

that provision is made for at least 15.81 million tonnes of sand and gravel.

Taking into account the needs of the Plan area as well as cross border demands, a landbank of at least 7 years will be maintained.

The 0.93 figures based on ten year annual average set out in Table 1 below (Figure 6.2.2 in the Pre-Submission Draft Plan).

Table 1: Annual Production of Sand and Gravel 2012-2021 (figures in million tonnes)

2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	Av
0.81	0.82	0.95	1.13	1.29	0.94	1.05	0.78	0.57	0.99	0.93

Swarkestone, Shardlow, Willington and Mercaston are the operational sand and gravel quarries in the Plan area which currently produce this sand and gravel. There is also one site, Elvaston, which is currently non-operational.

Allocations (identified in Table 2 below) are included in the Pre-Submission Draft Plan for additional sites at Sudbury, Foston, Swarkestone (North and South) and Elvaston, which is anticipated will yield an additional 13.35 million tonnes of sand and gravel.

Table 2: Allocated Sites in Pre-Submission Draft Plan.

Site	Estimated Yield/Reserve mt
Foston	3.1
Sudbury	2.0
Elvaston	1.5
Swarkestone South	2.5
Swarkestone North	4.25
Total	13.35

Of the existing consented sites these were identified at the end of 2021 as having reserves of 9.43 million tonnes of sand and gravel providing a landbank in the Plan area of 10.1 years (with total permitted reserves of 9.43 million tonnes divided by the annual provision rate of 0.93mt).

These were the figures on which the Pre-Submission Draft Plan was based. Further LAAs have been published since 2022 with the most recent being LLA being that 2025 which reports for the year ending 31st December 2024.

This identifies that annual production has increased slightly with the ten year and three averages having increased to 0.96 millions tonnes and 0.95 million tonnes respectively with a **Provision Rate of 0.96 million tonnes.**

More significantly it also identifies that the consented reserve at 31st December 2024 had fallen to 5.77 million tonnes, so that the updated landbank had similarly fallen to just under six years ($5.77/0.96 = 5.46$ years).

Going forward, if the revised provision rate is applied to the remaining 14 year period of the plan, this results in a revised provision for the remainder of the Plan period of **13.44 million tonnes (14 x 0.96 million tonnes)**.

The Inspector at the Examination hearings advised that a 10% uplift should also be applied to these figures. On this basis of a Provision Rate of 0.96 million tonnes plus 10% (i.e. 0.96 million plus 0.096 million) would result in an amended figure including **10% uplift of 1.056 million tonnes per annum**. An updated level of provision over the remainder of the Plan period would be $14 \times 1.056 = 14.78$ million tonnes.

Table 3 below sets out how this impacts in terms of the updated sand and gravel provision based updated Provision Rate:

Table 3: Updated Sand and Gravel Provision (Based on Annual Provision Rate)

Sand and Gravel		Million Tonnes
A	Annual Requirement	1.056
B	Total Production Requirement (A x14)	14.78
Reserves		
C	Permitted Reserves	5.77
Shortfall		
D	Shortfall 2025-2038 (B-C)	9.01

The above takes into account:

- Shorter Plan Period, i.e. 2025-2038;
- Reduced Permitted Reserves; and
- Updated Production Requirement.

Policy SP5 therefore needs to be updated to provide at least an additional 9.01 million tonnes of additional provision.

If an additional 7 years reserve is required to meet the requirement for maintaining a seven year landbank at the end of the plan period, then this would add 7.392 million tonnes based on a Provision Rate of 0.96 million tonnes plus 10%, so that the total shortfall would be 9.01 million tonnes + 7.392 million tonnes = **16.402 million tonnes**. That being the case inadequate provision would have been made in the plan and at least one additional sand and gravel site will be required.

If the requirement for maintaining the seven year landbank is not included, which is what the County Council argues, then **the requirement over the remainder of plan period would be 9.01 million tonnes.**

Based on these numbers alone, the existing allocations set out the Pre-Submission Draft Plan are sufficient to provide the identified shortfall in the plan.

However, the Plan also needs to take into account when the proposed allocations are likely to come forward to ensure that there is sufficient capacity over the whole of the plan period.

3. Capacity Update

With this in mind the second substantive issue, also raised by the Inspector is whether there is likely to be adequate capacity, i.e. whether assuming adequate allocations are included in the Plan, that these will come forward provide the required level of production when it is needed.

To address this point, **Appendix B** of the Pre-Submission Draft Plan sets out a "Sand and Gravel Delivery Schedule" which estimates when reserves are likely to be worked during the plan period. The table set out in Appendix B includes the consented and the allocated sites.

Key issues in relation to this matter are that as Pre-Submission Draft Plan acknowledges in paragraph 6.2.24 that Swarkestone North (the largest site) is only likely to become operational during the latter part of the Plan period, so that it will only contribute a small proportion of its material in the Plan period (around 1mt of its total 4.25mt). In addition, the latest survey returns from the East Midlands Aggregate Working Party Survey for 2024 (which from the basis of the 2025 LLA) identify that the reserve at each site may in some cases not be as great as had been initially assumed for the purposes set out in **Appendix B**, particularly given the updated Provision Rate of 1.056 million tonnes per annum. For example, it is now anticipated that Marcaston Quarry will cease production by the end of 2028.

Taking these factors into account and applying the revised Provision rate of 1.056 million tonnes per annum, a **revised version of Appendix B** is attached at the end of this assessment. This shows that in ten of the fourteen remaining years in the Plan Period the County Council would have a Sand and Gravel landbank of less than seven years, but more significantly that there would not be sufficient capacity to ensure that output is provided to meet the Provision Rate (of 1.056 million tonnes per annum), and that this would be the case from 2033 onwards, i.e. in the last five years of the Plan Period. As such, although there would be sufficient provision in the plan in terms of allocated reserves to meet the shortfall of 9.01 million tonnes, there would be insufficient capacity to ensure output of at least the Provision Rate and could by 2028 result in shortfall in production of upto

425,000 tonnes per annum, which would continue year on year after 2038. This is shown in the **revised version of table in Appendix B** at line 21 which indicates that there would be a shortfall (i.e. the figures in red). 436,000 tonnes per annum is at level that exceeds the existing level of production at any site either currently or as proposed in Derbyshire indicating that this would be equivalent to production from two or more additional sites.

The revised version of the Table in Appendix B does not change the assumptions about the level and timing of production at each site except that it is assumed that production at Marcaston would cease by the end of 2028.

On this basis it is identified that an additional site or sites should be allocated that can provide an output of at least 436,000 tonnes per annum. It is anticipated that deal with this an additional call for sites will need to be undertaken.

4. Discussion With the Sand and Gravel Operators

On the back of this revised capacity assessment, the Derbyshire County Council has had meetings in February 2026 with the three existing sand and gravel operators, which include, Cemex (11th February 2026) Heidelberg (18th February 2026), and Tarmac (25th February 2026), to present the Council's revised capacity assessment.

The operators have indicated that they have undertaken a similar assessment and reached similar conclusions in terms of the requirement to include additional capacity in the form of additional sites in the plan, and it is understood that have already identified potential additional sites that could be put forward in the event of an additional call for sites.

Derbyshire Sand and Gravel Capacity Assessment Updated Appendix B - February 2026

Site	Permitted/Allocated (Forecast)	Plan Period																
		2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038
Sand and Gravel																		
Shardlow Quarry	Permitted	350	350	400	400	400	400	400	280	0								
Sudbury	Allocated/Forecast							350	350	350	350	350						
Foston	Allocated/Forecast									400	400	400	400	400	400	400	400	300
Swarkestone Quarry	Permitted	320	320	175	320	320	320	200										
Swakestone South	Allocated/Forecast									320	320	320	320	320	320	320		
Swarkestone North	Allocated/Forecast																320	320
Willington Quarry	Permitted	350	350	200	80													
Willington Extension	Permitted				300	300												
Elvaston Quarry	New Application					305	300	300		300	300	300	300					
Elvaston Extension	Allocated/Forecast													300	300	300	300	300
Mercaston Quarry	Permitted	70	70	65	70	70	70	50										
Annual Production of Sand and Gravel		1090	1090	840	1170	1395	1440	1300	1250	1370	1370	1370	1020	1020	1020	1020	920	620
Consented Reserve/Landbank			6640	5770	5355	6160	7215	6170	7625	9680	8635	7590	6545	7000	5955	4910	8115	7070
Landbank Years			6.64	5.46	5.07	5.83	6.83	5.84	7.22	9.17	8.18	7.19	6.20	6.63	5.64	4.65	7.68	6.70
Provision Rate (10 year average)		1190	820	1056	1056	1056	1056	1056	1056	1056	1056	1056	1056	1056	1056	1056	1056	1056
Annual Production - 10 year Provision Rate (Note 1)					114	339	384	244	194	314	314	314	-36	-36	-36	-36	-136	-436
2024 Provision Rate	960000																	
10%	96000																	
Total	1056000																	
x 14 Years	14784000																	
Permitted Reserve 2024	5,770,000																	
Landbank	5,464,015,152																	
Shortfall	9,014,000																	
Notes																		
Note 1 Annual Production - 10 year Provision Rate - This is the annual surplus or shortfall calculated by subtracting the Provision Rate from the Annual Production figure. Figures in RED indicate a shortfall.																		