PDNPA Minerals Provision and Capacity Assessment June 2026 (Redacted)

Local Plan Review – Evidence Base

Contents

Introduction

This document forms part of the evidence base for the PDNPA Local Plan Review. It contains commercially sensitive data in regards to mineral reserves and production data for individual extraction sites. As such, this document will be provided to the Planning Inspectorate on a confidential basis. A redacted version including aggregated data has been provided for public viewing.

Key Points:

The PDNPA Local Plan period is 2025-2045

The Plan is based upon the Derbyshire, Derby City and Peak District National Park Authority LAA 2025 (2024 data)

Assessment seeks to:

- Assess whether existing output levels can be maintained throughout the Plan period.
- Assess whether the minimum required landbank of 10 years for crushed rock aggregate will be present at the end of the Plan period.
- Assess whether the minimum required reserves of industrial minerals will be provided for by the Plan.

Crushed Rock Aggregates

Policy and Guidance

The NPPF states at paragraph 226 that:

"Minerals planning authorities should plan for a steady and adequate supply of aggregates by:

- *preparing an annual Local Aggregate Assessment, either individually or jointly, to forecast future demand, based on a rolling average of 10 years' sales data and other relevant local information (our emphasis), and an assessment of all supply options (including marine dredged, secondary and recycled sources);*
- *… maintaining landbanks of at least 7 years for sand and gravel and at least 10 years for crushed rock, whilst ensuring that the capacity of operations to supply a wide range of materials is not compromised (Longer periods may be appropriate to take account of the need to supply a range of types of aggregates, locations of permitted reserves relative to markets, and productive capacity of permitted sites.)"*

Planning Practice Guidance (Minerals) states that when planning for aggregate minerals:

"The Managed Aggregate Supply System seeks to ensure a steady and adequate supply of aggregate mineral, to handle the significant geographical imbalances in the occurrence of suitable natural aggregate resources, and the areas where they are most needed. It requires mineral planning authorities which have adequate resources of aggregates to make an appropriate contribution to national as well as local supply, while making due allowance for the need to control any environmental damage to an acceptable level. …

- at local level, mineral planning authorities are expected to prepare Local Aggregate Assessments, to assess the demand for and supply of aggregates;"

Local Aggregates Assessment (2025)

The 2025 Derbyshire County Council, Derby City and the Peak District National Park Authority LAA (2024 data) demonstrates that as of the end of 2024 the PDNPA has a crushed rock aggregates reserve of 110.6Mt.

The 10 year production average is 3.19Mt.

The 3 year production average is 2.83Mt.

The 3 year production average has been agreed by the East Midlands AWP, through the ratification of the LAA, as representing the most accurate reflection of future demand. The 2025 LAA states:

"The ten-year average figure includes a period of depressed sales of aggregate crushed rock to 2015, as a result of an economic downturn when reduced demand saw sales being significantly lower than they had been in previous years. Increased demand since 2016 has seen an increase in the three-year average sales figure which, at 15.12mt, is now significantly above the ten-year average figure of 12.689mt. As a result, it would seem inappropriate to base future demand for aggregate crushed rock on the ten-year sales figure. The LAA considers that the three-year sales average is now most representative of current demand and is likely to be more representative of anticipated demand in future years."

Whilst the 3 year average is lower than the 10 year average for the PDNPA, the 3 year average is significantly higher for DCC and the combined LAA area as a whole. This reflects the trend towards increased production within DCC and a decline in the PDNPA. Given that the DCC Minerals Local Plan apportionment figures are based upon the 3 year average, it is appropriate that the PDNPA apportionment is based on the same to ensure consistency given the two Authorities produce a joint LAA.

It is therefore considered appropriate to use the 3 year average figure when calculating likely prospective output from the National Park throughout the forthcoming plan period.

Reserves as of end of 2024: 110,600,00

3 Year average production rate: 2,830,000

110,600,000 / 2,830,000 = 39

The PDNPA crushed rock aggregate landbank as of the end of 2024 is therefore **39 years**.

The Local Plan Review is proposed to cover the period 2025 – 2045, therefore at the end of the Plan period there will be a remining landbank of **19 years** based on the latest LAA**.**

The NPPF requires a MPA to produce an annual Local Aggregates Assessment which must form the evidence base for the calculation of aggregate provision in plan making. The LAA demonstrates that the PDNPA has a landbank in excess of the minimum requirement of 10 years both at the time of Plan submission and at the end of the Plan period.

Detailed Aggregates Provision and Capacity Assessment

During the Regulation 18 consultation process representatives of the mineral industry requested that a detailed capacity assessment be conducted to support the Local Plan Review (LPR). It was also suggested that a detailed capacity assessment should be conducted to support the LPR by the Inspectors during the Derbyshire County Council Minerals Local Plan Examination.

Crushed rock aggregates have been produced from 3 sites within the National Park over both the last 3 and 10 year periods. One of the sites (Topley Pike) has now ceased production, but the Beelow extension to Doveholes quarry (in DCC MPA area) came online in 2025.

Site	Aggregate Reserves (end 2024)	End Date
Old Moor (Tunstead)	[redacted]	2040
Ballidon	[redacted]	2035
Topley Pike	[redacted]	2026
Beelow (Doveholes)	[redacted]	2042

*Total reserves at Ballidon are indicated by the operator to be [redacted] tonnes. The extant planning permission requires at least 40% of annual output to be for industrial purpose. The operator has not specified estimated reserves for aggregate and non-aggregate purposes. However, returns submitted confidentially under a S.106 legal agreement pursuant to the planning permission indicate that the 40% industrial grade production target is generally met. Therefore 60% of total reserves are considered to be the potential aggregate reserves remaining within the site.

Given the end dates of all sites are within the proposed Plan period, emerging Policy M1 seeks to allow, in principle, extensions of time for sites with remaining reserves that make a meaningful contribution to the landbank at their current end dates.

Topley Pike has ceased production and is undergoing restoration, which is scheduled to be complete by the end of 2026, so will not be subject to further assessment.

It is necessary to assess the capacity of the remaining 3 sites to continue to provide aggregates throughout the Plan period (until 2045) on the basis of their 3 year production average.

Site	3 year production average (2022 – 2024)
Old Moor	[redacted]
Ballidon	[redacted]

Old Moor

[redacted] (average production) x 20 years (plan period) = [redacted]

[redacted] (total reserves at end of 2024) - [redacted] (estimated output over plan period) = [redacted] (remaining reserves)

[redacted] (remaining reserves) / [redacted] (average production) = [redacted] **years** (landbank at end of plan period)

It should be noted that production output from Old Moor quarry is not subject to end use restriction. There are considerable reserves ([redacted] as per LAA 2025) that are indicated by the operator (AM 2023 figures) to be used for industrial purposes, but are capable of being used for aggregates if necessary.

Ballidon

[redacted] (average production) x 20 (plan period) = [redacted]

[redacted] (reserves end of 2024) / [redacted] (3 year average output) = [redacted] years

[redacted]

Reserves ([redacted]) anticipated to be exhausted in [redacted] based on average output rate.

Consent expires in 2035.

In principle support for an extension of time through emerging policy M1. Potential support for further extraction of additional industrial grade limestone under exceptional circumstances tests in NPPF and emerging Policy M1. Potential to release further aggregates as part of any consent that may be granted.

Notwithstanding the above, given consented reserves will be worked out before the end of the Plan period, potential future production output from Ballidon that may be secured by way of a future consent have been excluded from further assessment.

Beelow

The Beelow extension to Doveholes quarry is relatively minor in the context of the wider site and is suggested to contain at least approximately [redacted] tonnes of aggregate reserves. The site as a whole contains [redacted] tonnes. The extension into the National Park is contiguous with the majority of the site contained within Derbyshire CC MPA area. While it is possible to separate out production and reserves from Old Moor and Tunstead given the two quarries are distinct sites falling almost completely within the two separate MPA areas, this is not the case at Beelow/Doveholes.

The operator (Cemex) has not been forthcoming with production or reserve data specific to the two elements of the site. Given the data has not been provided, and may not be practical/possible for the operator to provide, this capacity assessment considers the site a whole and makes some logical assumptions in order to project the output from the Beelow extension.

The average output from the site is approximately [redacted] tonnes per annum.

The reserves in Beelow are approximately [redacted]% of the total reserves within the site as a whole.

[redacted]% of the average annual output is [redacted].

Assuming [redacted] tonnes per annum is extracted from Beelow over the plan period (20 years) a total of [redacted] tonnes would be produced.

[redacted] (total reserves in Beelow) - [redacted] (production over plan period) = [redacted] (reserves remaining in 2045)

[redacted] (reserves remaining at end of Plan period) / [redacted] (assumed annual production) = [redacted] **years (landbank at end of plan period)**

Gritstone Aggregates

The PDNPA contains 3 building stone sites (Shire Hill, Wimberry Moss and Stoke Hall) that all have consent to sell stone as aggregate. The former two have a combined total of reserves estimated to be used for aggregate purposes of [redacted]. Stoke Hall has limited reserves and has not defined what proportion is likely to be used as aggregate, but it is understood to be limited with the company focusing on the dimension stone market.

Wimberry Moss has not produce any aggregates over the last 3 and 10 year periods and only a very limited amount of building stone. However, the site has recently come under new ownership with the new operator indicating a willingness to work the site and a ROMP submission due in July 2026. There are no historic production rates to consider given the site has not been working in any meaningful way over the last 10 years. Projected output rates are as yet unknown, so it is not possible to include Wimberry Moss in the aggregates forecast at this time, but [redacted] tonnes are noted as being designated for aggregate use in the latest annual return.

The 3 year average annual production output from Shire Hill is [redacted]

[redacted] (3 year average output) x 20 (Plan period) = [redacted]tonnes

[redacted] (Shire Hill Reserves end of 2024) – [redacted] (project output over plan period) = [redacted] (Shire Hill Reserves at end of Plan period)

[redacted] (Shire Hill Reserves at end of Plan Period) + [redacted] (Wimberry Moss Reserves) = [redacted]

[redacted] (Total gritstone aggregates reserves at end of Plan period) / [redacted] (3 year average gritstone aggregates output) = [redacted] Years

Total Remaining Landbank (years) and reserves at end of Plan Period

Old Moor: [redacted] years ([redacted] tonnes)

Beelow: [redacted] years ([redacted] tonnes)

Gritstone Aggregates: [redacted] years ([redacted] tonnes)

Total: [redacted] tonnes

Current total 3 year average annual output: 2, 830,000 (Old Moor, Topley Pike, Ballidon, Shire Hill, Stoke Hall)

Estimated average annual output from Beelow: [redacted]

2,830,000 + [redacted] = [redacted] tonnes/pa

Total remaining aggregates reserves at end of plan period [redacted] tonnes

[redacted] (remaining reserves at end of Plan period) / [redacted] (3 year average annual output + estimated output from Beelow) = **12 years** *(11.97 actual)*

10 Year Average Sales Data

Notwithstanding the above, should the 10 year average sales figure (3.19Mt), be added to the projected average output from Beelow ([redacted]) there would still be a sufficient landbank at the end of the Plan period.

3,190,000 + [redacted] = [redacted]

[redacted](remaining reserves at end of Plan period) / [redacted] (10 year average annual output + estimated output from Beelow) = **10.9 years** *(10.87 actual)*

Production Capacity

The closure of Topley Pike and potential closure of Ballidon within the Plan period could affect the National Park's capacity to provide aggregates. The 3 year annual average production output from both sites combined is [redacted].

Over the last 10 year period production outputs from Tunstead/Old Moor have varied, with the highest out occuring in [redacted], when the site produced [redacted] tonnes of aggregates and an overall total of [redacted]tonnes. The sites lowest output was in [redacted] when it produced [redacted] tonnes of aggregates and [redacted] tonnes in total.

[redacted] (max total production) – [redacted] (minimum total production) = [redacted] (demonstrable total spare capacity)

[redacted] (max aggregates production) – [redacted] = [redacted] (demonstrable spare aggregates capacity).

As such, it is clear the site has capacity to substitute for the capacity lost at Topley Pike and Ballidon.

While the exact production figures for Doveholes are not available to the PDNPA, it is understood from colleagues at DCC that production from Dovehole/Beelow quarry ranges from between [redacted] million tonnes per annum, with [redacted]million being the average. As such, the site has production capacity to substitute for the lost capacity at Topley Pike and potentially Ballidon.

Conclusion

Given the above calculations and the in principle support for extensions of time at aggregates sites with remaining reserves at their current end dates, it is clear the that the National Park will retain a landbank for crushed rock aggregate in excess of the minimum 10 years at the end of the Plan period and has the capacity to maintain current output rates. It should also be noted that the Plan is proposed to cover a period or 20 years, extended from the usual 15. Had the above capacity assessment been conducted on the basis of the standard Plan period length, the remaining landbank would be higher.

It is also anticipated that proposals to release additional aggregate reserves will be forthcoming within the Plan period which will further increase the landbank should they be approved.

It is clear that the PDNPA has sufficient aggregate reserves to meet the minimum landbank threshold as required by the NPPF and therefore meets the test of soundness. Notwithstanding, there will be opportunity to review the provision of aggregates at the next statutory plan review in 5 years time.

Industrial Grade Limestone

Industrial grade limestone is produced at three sites in the National Park, Hope Limestone Quarry, Old Moor and Ballidon. Mineral extracted at Hope Limestone quarry is used exclusively to feed the associated on-site cement works. Mineral extracted from Old Moor is also used to produce cement at the adjoining Tunstead cement works within DCC MPA area, as well as for a range of other industrial uses. Industrial grade mineral extracted at Ballidon feeds an on-site powders plant and is exported for a range of other uses.

Policy and Guidance

The NPPF states:

'Minerals planning authorities should plan for a steady and adequate supply of industrial minerals by:

a) co-operating with neighbouring and more distant authorities to ensure an adequate provision of industrial minerals to support their likely use in industrial and manufacturing processes;

b) encouraging safeguarding or stockpiling so that important minerals remain available for use;

*c) maintaining a stock of permitted reserves to support the level of actual and proposed investment required for new or existing plant, and the maintenance and improvement of existing plant and equipment**

** These reserves should be at least 10 years for individual silica sand sites; at least 15 years for cement primary (chalk and limestone) and secondary (clay and shale) materials to maintain an existing plant, and for silica sand sites where significant new capital is required; and at least 25 years for brick clay, and for cement primary and secondary materials to support a new kiln.'*

Cement

Hope Cement Work

Hope limestone quarry provides mineral exclusively for on-site cement manufacture and has reserves of [redacted] as per the 2025 annual return.

The 10 year average production output is [redacted]

[redacted] (remaining reserves) / [redacted] (10 year average production output) = [redacted] **years**

Based on the average production rate it is clear that current reserves fall below the 15 year minimum required by the NPPF to support the capital investment required to maintain an existing cement plant.

However, the PDNPA is currently considering a live planning application for the extension of the limestone quarry which seeks to release up to a further 13Mt of limestone for the purpose of cement manufacture.

Should the application be approved, there would be reserves of approximately [redacted] tonnes of limestone available to sustain cement manufacture at the current 10 year average rate for [redacted] **years** until the quarry and cement works current permitted end date of 21st February 2042.

Given the above calculations and the pending planning application, it is not considered necessary to allocate any further reserves through the Local Plan Review.

Tunstead Works (Old Moor)

The annual returns submitted by the operator for Old Moor are combined with Tunstead and the data provided to the PDNPA does not breakdown the end use of mineral from each quarry. However, the return does provide an overall end use breakdown across the two sites. As such it is possible to determine the 9 year (2023 data is missing) average consumption of limestone for cement manufacture across the two quarries, which equates to: [redacted] **tonnes.**

Reserves specified for non-aggregate use in Old Moor at end of 2024 equate to: [redacted]

[redacted] (non aggregate reserves end 2024) / [redacted] (9 year average output for cement manufacture) = [redacted] **years**

On the basis of the reserves in Old Moor alone, it is clear that there is sufficient provision to support the maintenance of Tunstead Cement Plant. In addition, there are considerable reserves within Tunstead quarry that can be utilised for cement manufacture. As such there is no need to make provision for further reserves at this point in time.

Limestone for other industrial uses

Limestone is used for many industrial purposes beyond cement manufacture, with Ballidon and Old Moor supplying markets including; agriculture/horticulture, iron/steel manufacture, building materials, chemical manufacture, environmental uses, glass making and specialised fillers. The two sites have end dates of 2035 and 2040 respectively and as such are currently due to cease operation during the Plan period. Given current average output rates, it is expected that both sites will have remaining industrial reserves at the expiry of their current consents.

It is recognised that industrial minerals serve a national need and proposals for their extraction may be capable of satisfying the exceptional circumstances test, if demonstrated to be in the public interest. Provision of industrial minerals is market driven, rather than plan led like aggregates. Therefore, any forthcoming applications for extensions of time or additional extraction will be judged on their own merits.

Whilst it is recognised that market needs are often driven by the specific chemical composition of the mineral, it should be noted that there are significant reserves of industrial grade limestone located within Derbyshire County Council MPA area, approximately 200 million tonnes as per the East Midland Aggregates Working Part: Annual Minerals Surveys (2009-2021). Industrial grade limestone is produced from 10 active sites within DCC and reserves are present at a further 3 inactive sites.

Given it is not possible to forecast future demand for industrial minerals, the extensive reserves in DCC MPA area and the flexibility provided by the emerging policy approach, it is not considered necessary to allocate any further sites for industrial mineral extraction at this time.

Conclusion

The emerging policy position offers the flexibility needed to ensure the continued supply of industrial minerals based upon market demand. The current application for the extension to Hope Limestone Quarry provides a potential route to ensuring sufficient reserves exist to support the capital investment needed to maintain the cement plant. As such, the PDNPA Local Plan Review will make the necessary provision for the supply of industrial minerals.