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# **London Borough of Hillingdon Local Aggregates Assessment Update Report**

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## London Borough of Hillingdon Local Aggregates Assessment Update Report

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# 1. Introduction

## 1.1 Background

This Local Aggregate Assessment Update Report has been produced by Jacobs UK Ltd on behalf of the London Borough of Hillingdon (LBH). This document is intended to update and supplement the previous Local Aggregate Assessment (LAA) that was produced on behalf of LBH in 2013. It has also been prepared to inform LBH's input into the Greater London Authority's request for information into an LAA for London, as well as comprising part of the evidence base for Hillingdon's emerging Local Plan Part 2.

## 1.2 Need to produce a local aggregate assessment

The National Planning Policy Framework (NPPF) was published by the Government in March 2012 and sets out the national planning policies for England. The NPPF must be taken into account in the preparation of local and neighbourhood plans, and is a material consideration for planning authorities in the determination of individual planning applications<sup>1</sup>.

The important social and economic role that minerals, and the extraction of minerals, play in the UK's economy is set out in the NPPF which states that *'Minerals are essential to support sustainable economic growth and our quality of life'*<sup>2</sup>

In order to maintain a steady and adequate supply of aggregates, mineral planning authorities such as LBH, are required to prepare:

*'an annual Local Aggregate Assessment, either individually or jointly by agreement with another or other mineral planning authorities, based on a rolling average of 10 years' sales data and other relevant local information, and an assessment of all supply options (including marine dredged, secondary and recycled sources)'*<sup>3</sup>.

This LAA Update Report has been produced on behalf of LBH in response to this requirement, although it should be noted that the Mayor of London produced a new London-wide LAA in December 2016, in order to promote joint working between the 35 mineral planning authorities in London<sup>4</sup>.

## 1.3 Purpose of a local aggregate assessment

The Government advise that an LAA should consist of three key elements<sup>5</sup>:

- *'a forecast of the demand for aggregates based on both the rolling average of 10-years' sales data and other relevant local information;*
- *an analysis of all aggregates supply options, as indicated by landbanks, mineral plan allocations and capacity data e.g. marine licences for marine aggregate extraction, recycled aggregates and the potential throughputs from wharves. This analysis should be informed by planning information, the aggregates industry and other bodies such as local enterprise partnerships; and*
- *an assessment of the balance between demand and supply, and the economic and environmental opportunities and constraints that might influence the situation. It should conclude if there is a shortage or a surplus of supply and, if the former, how this is being addressed'.*

<sup>1</sup> NPPF Paragraph 2.

<sup>2</sup> NPPF Paragraph 142.

<sup>3</sup> NPPF Paragraph 145.

<sup>4</sup> <https://www.london.gov.uk/what-we-do/planning/who-we-work/planning-working-groups/london-aggregates-working-party>

<sup>5</sup> NPPF Minerals Planning Practice Guidance, Local Aggregates Assessments available at:

<http://planningguidance.planningportal.gov.uk/blog/guidance/minerals/planning-for-aggregate-minerals/local-aggregate-assessments/>

## 1.4 Format for the Update Report

This LAA Update Report uses the 2013 Local Aggregate Assessment as a baseline against which changes to the position in LBH are assessed. The report is informed by, and should be read in conjunction with, the following documents:

- The Hillingdon Local Plan: Part 1 – Strategic Policies (November 2012)
- The emerging Local Plan: Part 2 – Site Allocations and Designations and Development Management Policies (October 2015);
- London Borough of Hillingdon Local Plan Part 2 Saved UDP Policies, (November 2012);
- The London Plan (March 2016);
- The National Planning Policy Framework (March 2012)
- The National Planning Practice Guidance on Minerals (October 2014);
- The London Aggregates Working Party (LAWP) Annual Monitoring Assessment (December 2016);
- Details from the National Infrastructure and Construction Pipeline 2016 document; and
- The Practice Guidance on the Production and Use of Local Aggregate Assessments produced by the Planning Officers Society and Mineral Products Association.

As well as information from the LAWP Annual Monitoring Assessment that was published in 2016<sup>6</sup>, this assessment has been supplemented by more recent information obtained from the LAWP<sup>7</sup> as well as details of various planning permissions that have been granted within LBH for minerals and aggregate recycling.

Inevitably this LAA Update Report is a ‘snapshot in time’ of the position as it stands in October 2017, particularly in relation to information about current planning applications. However, as it uses information from a range of sources and is produced in accordance with Government guidance it is considered to be a robust and objective assessment of aggregates within LBH.

This document follows the joint advice of the Planning Officers Society and Mineral Products Association that assessments ‘*should be relatively simple in style with clear data and consistent terminology*’<sup>8</sup>. As there has been no material change in geological data since the previous assessment, readers are referred to LBH’s 2013 LAA Section ‘*Geological data for Hillingdon*’.

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<sup>6</sup> London Local Aggregate Assessment 2016, which can be found at:  
[https://www.london.gov.uk/sites/default/files/london\\_iaa\\_2016.pdf](https://www.london.gov.uk/sites/default/files/london_iaa_2016.pdf)

<sup>7</sup> Email correspondence with the Secretary to London Aggregate Working Party (LAWP)

<sup>8</sup> [http://www.mineralproducts.org/documents/LAA\\_Guidance.pdf](http://www.mineralproducts.org/documents/LAA_Guidance.pdf)

## 2. Demand for Aggregates within LBH

### 2.1 10 year sales data

Government guidance on minerals requires MPAs to forecast the demand for aggregates based on both the rolling average of 10-years' sales data and other relevant local information<sup>9</sup>. MPAs should particularly consider average sales over the last three years, so that they can identify the general trend of demand and consider whether it might be appropriate to increase supply<sup>10</sup>.

The 2013 LAA for LBH identified an average sales figure for sand and gravel of 212,000 tonnes per annum for the 10-year period from 2004 – 2013<sup>11</sup>, and noted that sand and gravel sales for the period had been “*relatively stable*”<sup>12</sup>. Data obtained from the London Aggregates Working Party (LAWP) confirm an average sales figure of 216,593 tonnes per annum for the period 2014 – 16<sup>13</sup>.

These figures equate to average sales of 213,200 tonnes of sand and gravel per annum for the period 2006 – 2016. Over the last three years, sand and gravel sales equate to 216,593 tonnes per annum.

### 2.2 Sources for assessing likely future demand

In order to ensure that future projected demand for aggregates within LBH is not solely based on historic past sales, a review of proposed local and regional developments, including potential major infrastructure developments, has been undertaken.

This review has been based on the following documents:

- The National Infrastructure Plan<sup>14</sup> which sets out the UK's infrastructure needs and includes the government's priority investment projects.
- The Hillingdon Local Plan Part 1 and emerging Part 2;
- The London Plan 2016.

A review of these sources has been further informed by a discussion with officers at LBH to confirm the major projects and development aspirations that are likely to create demand for aggregates within the Borough. These are set out in section 2.3 and 2.4, below.

### 2.3 National infrastructure projects

A number of significant infrastructure projects are expected to come forward within LBH over the Local Plan period. The table below identifies projects within the Council's Strategic Infrastructure Plan that are expected to increase demand for aggregates within LBH.

**Table 1: Identified major infrastructure projects within Hillingdon**

Scheme	Description	Estimated cost	Timeline
M4 J3-12 Smart Motorway	As well as technological improvements, the scheme will also incorporate the widening of the motorway to include the addition of a hard shoulder, and the widening and replacement of some bridges.	£600-900 million	2017-22 <sup>15</sup>

<sup>9</sup> NPPF Minerals Planning Practice Guidance, Managed Aggregate Supply System, Paragraph: 062

<sup>10</sup> NPPF Minerals Planning Practice Guidance, Managed Aggregate Supply System, Paragraph: 064

<sup>11</sup> Hillingdon LAA, Table 7.

<sup>12</sup> Hillingdon LAA, conclusion section.

<sup>13</sup> Figures obtained from email correspondence with the Secretary to London Aggregate Working Party

<sup>14</sup> HM Treasury and Infrastructure UK. The National Infrastructure Plan. 2013

<sup>15</sup> <http://roads.highways.gov.uk/projects/m4-junctions-3-12-smart-motorway/>

Scheme	Description	Estimated cost	Timeline
M4 J3 and Bulls Bridge roundabout	Redesign and rebuild of Bulls Bridge roundabout and M4 J3.	£25 million	2021-2031 <sup>16</sup>
Western Rail Access to Heathrow	Provide new rail access to the Great Western Mainline. Includes new track, signalling and tunnelling.	£500 million	2020 <sup>17</sup>

## 2.4 Hillingdon Local Plan, proposed growth in LBH 2011-2026<sup>18</sup>

Table 2 below lists the development aspirations for LBH as identified in the growth figures contained in the LBH Local Plan Part 1.

**Table 2: LBH Local Plan strategic development allocations**

Proposed growth during plan period	Growth figure
Total new jobs	9,000
Total new homes	To provide a minimum of 6,375 dwellings
New office-based jobs	6,400
New jobs in Heathrow Opportunity Area	A proportion of 12,000
New jobs in RAF Uxbridge town centre extension	Estimated 1,160 permanent direct jobs (175 indirect jobs)
New homes at RAF Uxbridge	Approximately 1,340
Total designated employment land	358 hectares
Industrial and employment land release	17.58 hectares
Newly designated industrial and employment land	13.63 hectares
Additional hotel bedrooms	3,800 - 5,600
New retail floorspace in Uxbridge	18,855 square metres

## 2.5 Housing and population growth

The population of LBH was 273,936 residents in the 2011 Census<sup>19</sup>, which represents an increase of 12.7% for the 10-year period from 2001. For the period 2011 to 2016 it is estimated that the population of LBH was 304,000, based on figures provided by the Greater London Authority<sup>20</sup>, which is an increase of 11% for the five-year period from 2011.

<sup>16</sup> Draft SIP 2017 – Not yet a confirmed project

<sup>17</sup> <https://www.networkrail.co.uk/our-railway-upgrade-plan/key-projects/heathrow-rail-link/>

<sup>18</sup> Hillingdon Local Plan: Part 1 - Strategic Policies (Adopted November 2012)

<sup>19</sup> ONS 2011 Census

<sup>20</sup> Greater London Authority population projections estimate that in 2016 there are people living in Hillingdon

Table 3 below, illustrates these changes.

**Table 3: Census data for LBH**

Census date	Population	% increase over previous 10 years
1991	231,602	-
2001	243,006	3.7%
2011	273,936	12.7%
2016	304,000	11% for the five-year period from 2011.

The Council's Local Plan Part 1 contains a housing target for Hillingdon to deliver 425 new dwellings per annum over the plan period 2011 – 2026. More recently the London Plan (March 2016) uses a higher target of 559 new dwelling completions per annum<sup>21</sup>. This target is due to be reviewed again as part of the production of the new London Plan, which is expected to be in place sometime in 2019.

Table 4 below indicates that LBH is meeting its annual housing completion targets set out in the Local Plan Part 1 and the London Plan (March 2016).

**Table 4: Housing completions in LBH**

Year	Total completions	actual	Plan: annualised strategic allocation
1997/98	598		440
1998/99	515		440
1999/00	323		440
2000/01	647		440
2001/02	324		440
2002/03	238		440
2003/04	705		440
2004/05	851		440
2005/06	504		440
2006/07	193		440
2007/08	495		365
2008/09	827		365
2009/10	619		365

<sup>21</sup> The London Plan, March 2015, Table 3.1 Annual average housing supply monitoring targets 2015 – 2025



Year	Total completions	actual	Plan: annualised strategic allocation
2011/12	996		425
2012/13	1564		425
2013/14	615		425
2014/15	708		425
2015/16	907		559
2016/17	760		559

The fact that Hillingdon's housing target has been consistently met in recent years suggests that the availability of aggregates does not act as a constraining factor on development within borough.

## 2.6 Likely future London wide demand

Given the role that LBH plays in the supply of aggregates to Greater London, the development aspirations of the London Plan should also be considered.

Policy 3.3 of the London Plan 2016 sets a target to provide 'at least an annual average of 42,000 net additional homes across London' for the plan period 2015 – 2025. This is an increase from the previous figure of 32,210 net additional homes that was the target in the London Plan 2011.

For major construction schemes, the LAWP Annual Monitoring Assessment identifies a number of major construction schemes that could be delivered in London in the near future. These include the Bakerloo line extension, Crossrail 2, a Northern Line extension and an additional road based river crossing between north Greenwich and Silvertown. On a London-wide basis, the LAWP concludes that:

*"London will continue to need large quantities of aggregates to build infrastructure, homes and offices<sup>22</sup>."*

As far as it is possible to predict, demand for aggregates, both within LBH and on a London wide basis, will continue to be high. The new London Plan is expected to be in place sometime in 2019 and is also likely to confirm this ongoing high demand for aggregates.

## 2.7 Conclusion on demand for aggregates within LBH

The average sales data for sand and gravel shows that demand, as illustrated by sales within LBH, has remained at a relatively consistent level of around 213,200 tonnes of sand and gravel per annum for the period 2006 - 2016. This 10-year period includes a significant increase in the population of LBH.

Mineral Planning Authorities are advised that Local Aggregates Assessments should not solely assess demand based on the 10-year average supply, but should also consider possible future demand including looking at average sales over the last 3 years in particular to identify the general trend of demand<sup>23</sup>.

The three years' sales figure of 216,593 tonnes per annum is similar to the 10 year's figure, and includes the delivery of a significant number of new dwellings as shown in Table 4 of this document. Therefore, when considered against the 10-year sales figure, the three year's sales figure is not therefore considered to illustrate a significantly increased general trend of demand within LBH.

<sup>22</sup> LAWP AMR Paragraph 6.9

<sup>23</sup> NPPF Minerals Planning Practice Guidance, Managed Aggregate Supply System, Paragraph: 064, available at: <http://planningguidance.planningportal.gov.uk/blog/guidance/minerals/planning-for-aggregate-minerals/the-managed-aggregate-supply-system/>



Whilst the proposed development aspirations for LBH and the wider London area mean that it is likely that there will be a continuing demand for aggregates for the foreseeable future, it is considered that the 10 year and three year figures are a reasonable means of assessing aggregate future demand within LBH.

### 3. Aggregate supply options within LBH

#### 3.1 Aggregates supply options

The relevant government guidance identifies that LAAs should consider all aggregate supply options, including:

- Land-won resources, including landbanks and site specific allocations;
- Imports in and exports out of the mineral planning authority area;
- Recycled aggregates: sources include construction, demolition and excavation wastes;
- Secondary aggregates: sources include industrial wastes such as glass (cullet), incinerator bottom ash, railway ballast, fine ceramic waste (pitcher) and scrap tyres; and industrial and minerals by-products, notably waste from china clay, coal and slate extraction and spent foundry sand; and
- Marine aggregates from The Crown Estate<sup>24</sup>.

This section of the LAA Update Report therefore assesses the supply options that are available to LBH.

#### 3.2 Primary aggregates within LBH

LBH is one of the main sources of aggregates for London and the surrounding area. Under Policy 5.20 ('*Aggregates*') of the London Plan, LBH is one of just four London boroughs (along with Hounslow, Havering and Redbridge) that are expected to maintain a landbank of land-won aggregates through the London Plan period up to 2031<sup>25</sup>. Part D of the Policy 5.20 gives LBH an apportionment of maintaining a landbank for aggregates of at least 1.75 million tonnes, which is the equivalent of 0.25 million tonnes per annum for a seven-year period.

#### 3.3 Permitted minerals sites

The London LAA 2016 identifies that within LBH there are two sand and gravel quarries:

**Table 5: Identified active and inactive Sand and Gravel Sites within Hillingdon**

Site	Active / Inactive	Aggregate	Grid reference
Sipson Quarry (including Wall Garden Farm)	Active	Sharp sand and gravel	51 075 784
Harlington	Inactive	Sharp sand and gravel	51 091 783

The sites identified are consistent with those that were considered in the 2013 LAA<sup>26</sup>.

Sipson Quarry operates under planning permission 45408/APP/2014/1678<sup>27</sup> that was granted in 2014. The permission allows for the extraction of 350,000 tonnes of sand and gravel from the site, with operations due to cease by no later than August 2017<sup>28</sup>. A planning application has recently been submitted to allow extraction of the remaining 100,000 tonnes to continue until 30<sup>th</sup> September 2019. For the purpose of assessing how much sand and gravel is available at Sipson Quarry, a figure of 100,000 tonnes is therefore used based on the most up to date figure available.

<sup>24</sup> NPPF Minerals Planning Practice Guidance, Managed Aggregate Supply System, Paragraph: 063

Reference ID: 27-060-20140306, available at:

<http://planningguidance.planningportal.gov.uk/blog/guidance/minerals/planning-for-aggregate-minerals/the-managed-aggregate-supply-system/>

<sup>25</sup> London Plan, Policy 5.20, Criteria D, which can be viewed at:

[https://www.london.gov.uk/sites/default/files/the\\_london\\_plan\\_2016\\_jan\\_2017\\_fix.pdf](https://www.london.gov.uk/sites/default/files/the_london_plan_2016_jan_2017_fix.pdf)

<sup>26</sup> London Borough of Hillingdon LAA, Table 1, Page 9:

<https://www.hillingdon.gov.uk/article/29909/Local-Plan-Part-2-evidence-base-studies>

<sup>27</sup> <https://planning.hillingdon.gov.uk/OcellaWeb/planningDetails?reference=45408/APP/2014/1678&from=planningSearch>

<sup>28</sup> Planning Permission 45408/APP/2014/1678, Condition No, 1.

The site at Harlington is identified as being inactive at the present time<sup>29</sup>. The permission for the site (planning permission 2373/APP/2005/2815) was granted in 2005, subject to a condition that works should start within three years of the grant of planning permission<sup>30</sup>. There are no records of this permission ever being commenced or implemented, and in a separate planning application relating to Harlington Quarry dated 9 January 2013 described as being occupied by a “*disused sand and gravel processing plant*”.

Whilst there are areas of land that are safeguarded for mineral development in the adopted and emerging Hillingdon Local Plan, there are no sites actively allocated for mineral development (safeguarded sites are discussed in section 3.4, below).

Therefore, for the purposes of calculating the permitted landbank, the figure of 100,000 tonnes will be used, which is based on the information supplied to support the most recent Sipson Quarry planning application.

### 3.4 Potential alternative aggregates supplies

Minerals safeguarding is designed to ensure that non-minerals development does not needlessly prevent the future extraction of mineral resources that are of local and national importance<sup>31</sup>. LBH’s adopted Local Plan Part 1: Strategic Policies allocates three ‘*Mineral Areas for Safeguarding*’<sup>32</sup>. These are:

- Land to the West of Harmondsworth Quarry (yield 2.2 million tonnes);
- Land to the North of Harmondsworth (yield 0.75 million tonnes); and
- Land at Sipson Lane, East of the M4 Spur (yield 1.8 million tonnes)<sup>33</sup>.

The emerging Draft Local Plan Part 2: Site Allocations and Designations and Development Management Policies allocate the same three sites for Mineral Safeguarding.

This means that a total of 4.75 million tonnes of aggregate are identified and safeguarded within LBH.

It should also be noted that in October 2013 a Certificate of Appropriate Alternative Development was granted for land at Moorbridge Farm and Bedfont Court Estate, West of Stanwell Moor Road within LBH. The Certificate is not a planning permission but confirms that Planning Permission would be granted for the use of land for the extraction of sand and gravel, filling with inert waste and restoration to agriculture including associated works, subject to a series of planning conditions.

### 3.5 Imports into LBH

The London LAA 2016 identifies four rail depots within LBH that are used for aggregates handling:

- West Drayton, operated by Hanson Aggregates for crushed rock and sand and gravel;
- West Drayton, operated by Lafarge Industries for crushed rock;
- West Ruislip operated by Yeoman Aggregates for crushed rock; and
- Hayes operated by Lafarge Tarmac Ltd, for crushed rock.

For reasons of commercial confidentiality, it is not possible to give a figure for each individual depot, but the overall rail depot sales for LBH are as follows:

- 2014: 771,450 tonnes of crushed rock sales;
- 2015: 466,866 tonnes of crushed rock sales;

<sup>29</sup> LAA for London, December 2016, Appendix A

<sup>30</sup> Planning permission 2372/APP/2005/2815, Condition No. 1, i.e. a deadline of 7 October 2008.

<sup>31</sup> Minerals NPPG Note, Paragraph 002, which can be found at: <https://www.gov.uk/guidance/minerals#minerals-safeguarding>

<sup>32</sup> LBH Local Plan Part 1, Map 8.6 ‘*Mineral Areas for Safeguarding*’.

<sup>33</sup> The yield figures are from the London Borough of Hillingdon Local Development Framework Background Technical Report: Minerals April 2008 and total 4.75 million tonnes

- 2016: 756,934 tonnes of crushed rock sales<sup>34</sup>.

### 3.6 Secondary and recycled aggregates

The London 2016 London-wide LAA identifies three recycled and secondary aggregate sites within LBH:

- Crow's Nest Farm, operated by Country Compost Ltd;
- Holloway Lane Materials Recycling Centre, operated by Iver recycling (UK) Ltd; and
- Wallingford Road Recycling Centre, operated by Johal Mya Waste Management Ltd.

In addition, planning permission was granted in 2013 for an aggregates recycling centre at the former Powergen site at North Hyde Gardens, Hayes. Therefore, the estimated recycled and secondary aggregate recycling capacity for LBH is as follows:

**Table 6: Estimated recycled and secondary aggregate recycling capacity within Hillingdon**

Site	Estimated capacity
Crow's Nest Farm	38,000 tonnes per annum <sup>35</sup>
Holloway Lane Materials Recycling Centre	Not stated.
Wallingford Road Recycling Centre	Up to 60,000 tonnes per annum <sup>36</sup>
Former Powergen Site	Up to 300,000 tonnes per annum <sup>37</sup>
<b>Total</b>	<b>Over 398,000 tonnes per annum</b>

### 3.7 Marine aggregates

There are no aggregate wharves in LBH.

### 3.8 Total aggregate supply

The known sources of aggregates supply within LBH are summarised in Table 7, below.

**Table 7: Estimate of LBH's total aggregates supply**

Aggregates Source	Annual capacity
Active land-won sites	100,000 tonnes.
Rail depots	750,000 tonnes per annum <sup>38</sup>
Recycled and Secondary Aggregate Recycling Capacity	Over 398,000 tonnes per annum
Marine aggregates	Zero.
<b>TOTAL</b>	<b>Over 1,248,000 tonnes per annum.</b>

<sup>34</sup> Figures obtained from email correspondence with the Secretary to London Aggregate Working Party

<sup>35</sup> Condition No 6 of planning permission 1113/APP/2011/1020:

[https://planning.hillingdon.gov.uk/OcellaWeb/viewDocument?file=dv\\_pl\\_files%5C1113\\_APP\\_2011\\_1020%5Cpdecstd2011201133133.pdf&module=pl](https://planning.hillingdon.gov.uk/OcellaWeb/viewDocument?file=dv_pl_files%5C1113_APP_2011_1020%5Cpdecstd2011201133133.pdf&module=pl)

<sup>36</sup> Condition No 8 of planning permission 60930/APP/2011/2307:

[https://planning.hillingdon.gov.uk/OcellaWeb/viewDocument?file=dv\\_pl\\_files%5C60930\\_APP\\_2011\\_2307%5Cpdecstd20121227172548.pdf&module=pl](https://planning.hillingdon.gov.uk/OcellaWeb/viewDocument?file=dv_pl_files%5C60930_APP_2011_2307%5Cpdecstd20121227172548.pdf&module=pl)

<sup>37</sup> Condition No. 24 of planning permission 13226/APP/2012/2185:

[https://planning.hillingdon.gov.uk/OcellaWeb/viewDocument?file=dv\\_pl\\_files%5C13226\\_APP\\_2012\\_2185%5Cpdecstd20130822142858.pdf&module=pl](https://planning.hillingdon.gov.uk/OcellaWeb/viewDocument?file=dv_pl_files%5C13226_APP_2012_2185%5Cpdecstd20130822142858.pdf&module=pl)

<sup>38</sup> Based on most recent sales figures.

## 4. Existing sand and gravel landbank

The length of the aggregate landbank is defined as the sum in tonnes of all permitted reserves for which valid planning permissions are extant, divided by the annual rate of future demand based on the latest annual Local Aggregate Assessment<sup>39</sup>.

### 4.1 Current landbank

As set out in Section 3.3 (above) the only reserves within LBH with planning permission are therefore any residual reserves left at Sipson Quarry.

Table 8 shows the number of land bank years for three apportionment scenarios as suggested in the LAA guidance for LBH's permitted reserves.

**Table 8: LBH sand and gravel landbank based on various output scenarios**

Scenario	Annual Requirement (000 tonnes)	Permitted reserves at 01/5/2017 (000 tonnes)	Landbank (years)
London Plan Apportionment	250	100,000 tonnes at Sipson Quarry	Less than one year
Average annual sales over past 10 years	213	100,000 tonnes at Sipson Quarry	Less than one year
Average annual sales over previous 3 years	216	100,000 tonnes at Sipson Quarry	Less than one year

Table 8 therefore indicates that currently LBH's permitted land-won reserves do not fulfil the requirements of the London Plan, Policy 5.20, Part D to provide an aggregates landbank of at least 1.75 million tonnes, or a seven-year supply. Similarly, LBH does not have sufficient permitted reserves to supply the average annual LBH aggregates sales of the past three or 10 years.

Whilst LBH is not able to meet their London Plan apportionment target, this is not a unique position. The LAA for London that was published in 2016 notes that: *'London has almost no landbank of permitted reserves remaining – as current reserves are being worked out they are not being replaced with new permissions supply options<sup>40</sup>.*' Table 7 of the London LAA sets out the latest figure for London as a whole which shows that there is only a 2-year land bank of permitted sand and gravel sites.

There are a number of alternate supply options available to LBH, which has more identified aggregate handling rail depots than any other London Borough. As set out in Section 3.6 of this report, planning permission has recently been granted for a scheme that significantly increases LBH's recycled and secondary aggregate recycling capacity.

In addition to this, the emerging LBH Local Plan Part 2 proposes to allocate three mineral safeguarding areas, with an identified reserve of 4.75 million tonnes. Whilst the length of an aggregate landbank is calculated based on the sum in tonnes of all permitted reserves (i.e. those with a valid planning permissions that is current or extant), Table 9 shows how the potential yield from safeguarded areas combined with permitted reserves will address the landbank under each scenario.

<sup>39</sup> NPPF Minerals Planning Practice Guidance, Managed Aggregate Supply System, Paragraph: 082

<sup>40</sup> Paragraph 5.5 of the London LAA 2016 produced by LAWP, which can be viewed at: [https://www.london.gov.uk/sites/default/files/london\\_iaa\\_2016.pdf](https://www.london.gov.uk/sites/default/files/london_iaa_2016.pdf)

Table 9: LBH sand and gravel landbank including sites currently proposed for safeguarding

Scenario	Output (000 tonnes)	Permitted reserves (000 tonnes)	Yield from sites in Local Plan (000 tonnes)	Total	Yield from sites in Local Plan
London Plan Apportionment	250	100	4,750	4,850	19.4 years
Average annual sales over past 10 years	213	100	4,750	4,850	22.4 years
Average annual sales over previous 3 years	216	100	4,750	4,850	22.5 years

Given that LBH is currently unable to demonstrate an aggregates landbank as required in the London Plan and the NPPF, the Council should consider whether the LBH Local Plan Part 2 could be used to address the shortage of sites.

## 4.2 Potential next steps

The Government guidance sets out that Mineral Planning Authorities can plan for the steady and adequate supply of minerals by allocating sites in one or more of the following ways (in order of priority):

- Designating Specific Sites – where viable resources are known to exist, landowners are supportive of minerals development and the proposal is likely to be acceptable in planning terms. Such sites may also include essential operations associated with mineral extraction;
- Designating Preferred Areas – which are areas of known resources where planning permission might reasonably be anticipated. Such areas may also include essential operations associated with mineral extraction; and/or
- Designating Areas of Search – areas where knowledge of mineral resources may be less certain but within which planning permission may be granted, particularly if there is a potential shortfall in supply.

LBH could consider whether there is sufficient information to allocate sites for mineral development in line with these definitions that are set out in the NPPG<sup>41</sup>. The Council could also consider adopting a criteria based planning policy that would be used to assess planning applications for mineral development on sites that are not allocated within the Local Plan.

<sup>41</sup> <https://www.gov.uk/guidance/minerals>, Para 008

## 5. Conclusions

This LAA Update Report has been produced by Jacobs UK Ltd on behalf of LBH.

Based on the development aspirations contained within the LBH Local Plan Part 1, and also the provisions of policies in the current London Plan, there is likely to be a consistently high level of demand for aggregates within LBH for the foreseeable future. There are also a number of infrastructure developments planned for LBH that will contribute to this ongoing demand and ongoing targets for new housing that are expected to increase.

In assessing future demand, the average 10-year figure of 213,200 tonnes of sand and gravel per annum is considered to be the best basis on which to make forecasts. This is based on the fact that the three year and 10-year annual sand and gravel sales figures are similar.

Within the last three years, housing completions within LBH have been at a higher level than the targets for the Borough contained within the LBH Local Plan Part 1 and the current London Plan target. It is not therefore considered that the availability of aggregates would act as a constraint on meeting future development aspirations within LBH.

In assessing sources of supply for aggregates, it is evident that LBH has a variety of options available. Whilst the Council is not able to demonstrate a seven year landbank of permitted reserves, the opening of an aggregates recycling centre at the former Powergen site in Hayes for the production of secondary aggregates significantly increases LBH's alternative supply sources of aggregates, and adds to the number of sites within the borough that currently recycle aggregates. The mineral handling rail depots play an important role in providing imported crushed rock, both locally and in the greater London area.

There is however a relative lack of operational mineral sites within LBH, and the Council will need to consider how to address this issue. If the most recent planning application at Sipson Quarry is approved then, until future sites come forward, there will be only one operational quarry within LBH. Further to this, permitted reserves of aggregates within LBH are considerably below the level required by Policy 5.20 of the London Plan and paragraph 145 of the NPPF.

In order to help plan for the steady and adequate supply of minerals and to address landbanking issues, LBH should consider allocating sites for potential future mineral development. The approach to categorising sites could be in line with the approach set out in the NPPG. Allocating sites in this way would also play a useful role in safeguarding known mineral resources from potentially being sterilised by non-mineral development.

Further to this, the Council should also consider adopting a criteria based planning policy for use in the determination of planning applications for minerals development. A policy of this nature would help potential operators by giving them some certainty over the criteria against which planning applications for mineral development will be assessed.