PLACE PANEL

MEETING TO BE HELD AT 2.00 PM ON THURSDAY, 31 JANUARY 2019 IN COMMITTEE ROOM A - WELLINGTON HOUSE, LEEDS

A G E N D A

1. **APOLOGIES FOR ABSENCE**

2. **DECLARATIONS OF DISCLOSABLE PECUNIARY INTERESTS**

3. **EXEMPT INFORMATION - EXCLUSION OF THE PRESS AND PUBLIC**

4. **MINUTES OF THE MEETING OF THE PLACE PANEL HELD ON 24 OCTOBER 2018**
   (Pages 1 - 8)

5. **CHAIR'S UPDATE**

6. **PLACEMAKING**
   (Pages 9 - 12)

7. **HOUSING AND PLANNING UPDATE**
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9. **WEST YORKSHIRE LOCAL AGGREGATE ASSESSMENT 2018**
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10. **DATE OF THE NEXT MEETING - 11 APRIL 2018**

Signed:

Managing Director
West Yorkshire Combined Authority

MINUTES OF THE MEETING OF THE PLACE PANEL HELD ON WEDNESDAY, 24 OCTOBER 2018 AT COMMITTEE ROOM A - WELLINGTON HOUSE, LEEDS

Present:

Councillor Tim Swift MBE (Chair)	Calderdale Council
Councillor Susan Hinchcliffe	Bradford Council (from minute 8)
Councillor Richard Foster	Craven District Council
Councillor Richard Lewis	Leeds City Council
Councillor John Mackman	Selby District Council
Councillor Daniel Sutherland	Calderdale Council
Amir Hussain	Yeme Architects (from minute 7)
Dilys Jones	Homes England

In attendance:

Ben Still	West Yorkshire Combined Authority
Alan Reiss	West Yorkshire Combined Authority
Kate Thompson	West Yorkshire Combined Authority
Judith Furlonger	West Yorkshire Combined Authority
Noel Collings	West Yorkshire Combined Authority
Michael Long	WestYorkshireCombinedAuthority
Neville Ford	Wakefield Council
Ruth Chaplin	West Yorkshire Combined Authority
Megan Hemingway	West Yorkshire Combined Authority

1. Apologies for absence

Apologies were received from Councillors Rebecca Burnett, Helen Douglas, Denise Jeffrey, Andrew Lee, Peter McBride, Roy Miller and Alex Ross-Shaw and Jacqui Gedman, Andrew Latchmore and Matthew Walker.

2. Declarations of Disclosable Pecuniary Interests

There were no pecuniary interests declared by members at the meeting.

3. Exempt Information - Exclusion of the press and public

There were no items on the agenda requiring exclusion of the press and public.

4. Governance arrangements

The Panel considered a report on the governance arrangements for the Place Panel which is a new advisory committee.

The Terms of Reference were attached at Appendix 1 and it was noted that the Panel's functions would cover those previously carried out by the Land and Assets Panel and the Planning Portfolios Board. The Panel would promote **quality of place** in the Leeds City Region.

Resolved: That the governance arrangements for the Place Panel be noted.

5. Chair's Update

The Chair welcomed members to the first meeting of the Panel.

It was noted that the Panel had held a workshop on 2 October 2018 and the following key points were discussed:

- What makes great places and the need to identify good examples and case studies.
- The need to keep up to date with the Local Plan positions across the City Region.

The Chair highlighted that meetings will be held quarterly and proposed that in the event the Panel identify issues/topics for further discussions it may be beneficial for additional workshops to be arranged.

6. Leeds City Region Housing Vision

The Panel considered a report which sought endorsement of the Leeds City Region Housing Vision.

In discussing the key themes of the Vision, which was attached at Appendix 1, it was acknowledged that:

- There was a need to build on existing Partnerships.
- Transport was key to connect neighbourhoods and to unlock sites.
- The target of 65'000 new homes over the next 5 years was required to support economic growth.

Members discussed the percentage of Affordable Housing within the new homes target, the option of Modular Builds and whether there was an appetite for these. It was noted that there are recent instances of some house builders buying their supply chain to expedite delivery of new homes.

It was reported that Councillor Swift, the Chair of the Panel, had been invited to present a keynote speech at the Brownfield Redevelopment: North Conference on 7 November 2018. It was considered that this would provide an opportunity to include and reference the Housing Vision in the presentation.

Resolved:

(i) That the Leeds City Region Housing Vision be endorsed.

(ii) That the Housing Vision be included and referenced in the presentation to the Brownfield Redevelopment: North Conference on 7 November 2018.

7. Leeds City Region Strategic Sites Pipeline

The Panel considered a report on the Leeds City Region Strategic Sites Pipeline.

It was noted that the report will be a 'live' document and would be updated and used as a tool to monitor the delivery of the pipeline. A copy of the pipeline was attached at Appendix 1 and this had been developed with input from all the Leeds City Region districts.

The pipeline list will track investments in the pipeline and explore gaps in resource where delivery can be assisted. It identifies those sites which are strategic in nature and which require additional investment or resource to expedite delivery.

It was proposed that 6 monthly updates and an annual monitoring report be prepared for future meetings of the Panel.

Resolved:

(i) That the detail of the Leeds City Region Strategic Sites Pipeline report be noted.

(ii) That six monthly updates and an annual monitoring report be brought to future meetings of the Panel.

8. Energy Strategy and Delivery Plan

The Panel considered a report which provided an update on the Leeds City Region Energy Strategy and Delivery Plan.

Members discussed the report and its appendices and it was noted that:

- Different technologies were being considered.
- There was still a need for site surveys.
- Local Planning rules and regulations still took precedence.
- The Paris Climate Change CO_2 emissions target (2%) was now superseded by the IPCC Report (1.5%).
- Existing projects and Government initiatives met over 60% of the target.
- Further investment will be required to meet targets.

The Panel endorsed the Energy Strategy and Delivery Plan and recognised the importance of having a strategy in place. They were supportive of setting a

Science-based carbon dioxide (CO2) emissions reduction target for the City Region. It was requested that a report on the development of the setting of the reduction target be brought to a future meeting. The following additional comments were made:

- What it would entail to bridge the gap between the Paris and IPCC targets and should the Combined Authority be ambitious by adopting the 1.5% target.
- There is a need for an increased uptake of Green Energy tariffs from wholesalers and perhaps councils leading by example.
- There should be a use of existing supply chains where possible.
- Why was wind energy not identified.
- There is a risk associated with the investment in competing energies of hydrogen and electric.
- These energies are being explored on both a regional and national level by suppliers and transport providers.
- The number of projects in the report presented a significant challenge, both in terms of new builds and more notably in retro-fitting existing properties.

It was reported that the Energy Strategy and Delivery Plan would be considered by the LEP Board and Combined Authority.

Resolved:

(i) That the contents of the Energy Strategy and Delivery Plan be noted.

(ii) That a report on the development of a carbon dioxide emission reduction target be brought to a future meeting.

9. Green and Blue Infrastructure Strategy and Delivery Plan

The Panel considered a report which provided an update on the development of the Green and Blue Infrastructure Strategy and Delivery Plan.

Members discussed the plan which had been developed following the Boxing Day floods 2015 and a copy was attached to the report. It was recognised that post-Brexit support for an agricultural and environment policy was important and the need to work with partners and Yorkshire Water was highlighted.

The need to secure resource to deliver the plan was acknowledged and further work will be undertaken in respect of the financial and staffing implications.

It was reported that the Green and Blue Strategy and Delivery Plan would be considered by the LEP Board and Combined Authority.

Resolved: That the Green and Blue Infrastructure Strategy and Delivery Plan be noted.

10. Statement of Common Ground and Strategic Planning Review

The Panel considered a report on the Statement of Common Ground and Strategic Planning Review.

Members discussed the draft Leeds City Region Statement of Common Ground and Leeds City Region Planning Review Recommendations which were attached as Appendices 1 and 2 to the submitted report.

It was noted that the Statement of Common Ground was designed to reflect strategic cross-boundary planning matters and that local planning authorities were working together. The Strategic Planning Review had been updated to reflect changing governance arrangements and progress made in respect of cross-boundary working. Details of the key changes were outlined in the submitted report and the Panel was advised that these had been endorsed by Leeds City Region Heads of Planning and Directors of Development.

Resolved:

(i) That the Statement of Common Ground be endorsed and recommended to the Combined Authority for approval.
(ii) That the Strategic Planning Review be endorsed and recommended to the Combined Authority for approval.

11. Duty to Cooperate

The Panel considered a report on the Duty to Cooperate.

The meeting was attended by Neville Ford, Wakefield Council's Service Manager, Planning and Transportation Policy who presented a report which provided an update on the preparation of the Wakefield District Local Plan 2036. This set out the activities Wakefield Council is undertaking as the plan progresses to discharge its responsibilities under the Duty to Cooperate.

It was noted that the need to plan was key to Inclusive Economic Growth and there was support from all members to improve place.

The Panel welcomed the document and endorsed the approach to the Duty to Cooperate. Members were asked to provide any comments in respect of the Strategic Issues Table which was attached to the report by 30 November 2018.

Resolved:

(i) That the approach to the Duty to Cooperate be endorsed.

(ii) That comments in respect of the Strategic Issues Table attached at Appendix 1 be provided by 30 November 2018.

12. One Public Estate (Phase 7) Invitation to Apply

The Panel considered a report on the One Public Estate (Phase 7) Invitation to

Apply.

Members were informed that the invitation to apply for One Public Estate (OPE) Phase 7 funding was released on 28 September 2018 with a deadline for submissions by 30 November 2018.

The Panel agreed that the Combined Authority work with district partners that wish to apply for Phase 7 funding and that the Combined Authority co-ordinate the funding application.

It was agreed that the Chair of Place Panel, with the Leeds City Region Chief Executive Lead for Housing and Planning and the Combined Authority's Managing Director approve the final bid application by the OPE partnership by the submission deadline.

Resolved:

(i) That the Combined Authority work with One Public Estate district partners that wish to apply for Phase 7 funding and that the Combined Authority co-ordinate the funding application.

(ii) That the Chair of the Place Panel, in liaison with the Leeds City Region Lead for Housing and Planning and the Combined Authority's Managing Director, agree the final application for endorsement and submission by the Combined Authority by the submission deadline.

13. Homes England Update

Dilys Jones provided the Panel with a verbal update on Homes England (HE) investment programmes which support delivery of new homes in the Leeds City Region.

It was noted that:

- In total over £30m was invested by HE in the City Region 2017/18. Delivering over 1000 starts and 1083 completions.
- HE expects a minimum spend of £27.4m in 2018/19 in a number of programmes including Affordable Housing 2016-21, Land Investment and Housing Infrastructure Funding bids.
- Rental housing was back on the agenda as a means to provide affordable housing in the North.
- Funding was available for providing homes for older and vulnerable people.
- There had been land transfer issues but HE was not interested in ownership and instead aimed to unlock land for development.

The ability of Housing Associations to be flexible and to provide mixed tenure schemes was noted together with the lack of housing renewal programmes to respond to viability issues on challenging sites and schemes.

Resolved: That the Homes England update be noted.

14. Governance arrangements for the Leeds City Region Enterprise Zones Programme

The Panel considered a report on the proposed change to Governance arrangements for the Leeds City Region Enterprise Zone Programme.

The report provided an overview of the Leeds City Region Enterprise Zone programme which includes two Enterprise Zone (EZ) designations, comprising of ten sites.

It was noted that in 2016 the Combined Authority had set up a Strategic Oversight Board which was responsible for establishing a shared vision for the Enterprise Zones but this did not have decision making capacity. The Combined Authority has identified the need to prioritise the accelerated delivery of the EZ programme and a review of governance arrangements had been undertaken to ensure there was a structure able to make strategic and operational decisions.

Members discussed the proposed governance structure which was outlined in the submitted report. They endorsed the recommendations but stressed the importance of the Panel and LEP board being provided with progress reports. It was reported that the arrangements would be formalised by the LEP Board and the Combined Authority.

Resolved:

(i) That the Strategic Oversight Board will no longer convene.

(ii) That the changes to the EZ governance arrangements as outlined in the submitted report be introduced informally and with immediate effect with updates provided to the relevant Combined Authority Panels/Committees as follows with the intention of formalising the arrangements:

- LEP Board – 22 November 2018
- Combined Authority – 13 December 2018

(iii) That notification of the changes agreed and implemented are reported to the Government's Cities and Local Growth Unit in line with the obligations stated within the Memorandum of Understanding.

(iv) That in response to the Panel's request it was agreed that programme level updates would be provided regularly to the LEP Board.

FOR INFORMATION

15. Local Plan Update

The Panel considered a report which provided an update on the progress and status of the Leeds City Region development plans.

It was noted that all partner councils except York have a development plan in place and it was suggested that it would be useful to have a workshop to consider the progress of each districts plans.

Resolved: The Panel noted the Local Plan Update.

16. Forward Plan

Resolved: That the Forward Plan be noted.

17. Minutes of the meeting of the Land and Assets Panel held on 20 April 2018

Resolved: That the minutes of the meeting of the Land and Assets Panel held on 20 April 2018 be noted.

18. Date of the next meeting - 31 January 2019

Report to:	Place Panel
Date:	31 January 2019
Subject:	**Placemaking**
Director(s):	Alan Reiss, Director of Policy, Strategy and Communications
Author(s):	Judith Furlonger/Michael Long

1. Purpose of this report

1.1 A presentation will be made to the Place Panel on 'Placemaking' followed by a wider discussion about what makes 'great places' and how to develop and promote successful place making across the Leeds City Region in our towns and city centres.

1.2 To discuss next steps to develop guidance and principles for creating good places to live, work and spend time in high quality environments which are well connected digitally and by public transport.

2. Background

2.1 At the Place Panel member's workshop held on 2 October 2018 a number of actions were agreed that would be included in the forward plan. Two actions agreed related to 'Placemaking' specifically:

- **What makes great places: identify good examples and case studies that can be used to promote successful place making work that has undertaken place in the City Region?**

- **Could this be supported by a visit for Place Panel members of the exemplar Placemaking projects?**

2.2 Placemaking is about connecting the space between buildings and, as an approach, can create new places to live as well as improving, enhancing and reinventing existing spaces within neighbourhoods, towns and cities. Place Panel considers and advises on policy development to promote delivery of

- housing growth, quality and regeneration;
- infrastructure planning including in respect of transport, recreation and culture; and

- strategic land use and asset management

2.3 As such Placemaking becomes an opportunity through which an integrated approach to delivery can create vibrant, people-friendly regenerated town and city centres with high quality green infrastructure and public realm, places which deliver the City Region Housing Vision.

2.4 Placemaking has an intrinsic link to a number of other policy areas. For example, the recently set up Historic Building Strategy Group, with a focus on repurposing historic buildings, has been widened to contribute to a Place based approach which incorporates promotion of regional cultural assets as destinations.

2.5 In addition, the 'Healthy Streets' approach provides a framework for putting people and their health at the heart of improving existing transport networks and places in both new developments and existing developed areas. This promotes the creation of high quality places for people, and proposes investments that enhance connectivity and also better manage the adverse impacts of traffic to improve personal safety, reduce air pollution and carbon emissions, and provide good environments that are more conducive to social interaction and physical activities such as walking and cycling. (A specific paper on the Healthy Streets approach will be brought to a future Place Panel)

2.6 Districts partners are driving change at a local level developing town centre masterplans and with a place based place making approach there is an opportunity to adopt a wider strategic narrative to connect our places together and present a regional offer.

2.7 Next steps for Panel members is to consider a set of high level principles which can guide to resource and attract increased investment to deliver ambitions across the City Region.

2.8 As part of next steps, the suggestion is to begin to explore with Place Panel good examples in the City Region through a further workshop session and establish the need for further policy development.

3. Financial Implications

3.1 There are no financial implications directly arising from this report.

4. Legal Implications

4.1 There are no legal implications directly arising from this report.

5. Staffing Implications

5.1 There are no staffing implications directly arising from this report.

6. External Consultees

6.1 No external consultations have been undertaken.

7. Recommendations

7.1 That the place panel follow the presentation with a discussion

8. Background Documents

None.

9. Appendices

None.

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Report to:	Place Panel
Date:	31 January 2019
Subject:	**Housing and Planning Update**
Director(s):	Alan Reiss, Director of Policy and Strategy and Communications
Author(s):	Judith Furlonger / Michael Long / Marie Kiddell (Homes England)

1 Purpose of this report

1.1 To update Place Panel members on a number of emerging national housing and planning policy issues and the potential implications for the Leeds City Region. These specifically relate to ability to access future funding and regeneration of town centres.

1.2 To inform Place Panel members of the West Yorkshire Combined Authority response to the consultation on *'Planning Reform: supporting the high street and increasing the delivery of new homes'*, submitted on 14 January 2019.

1.3 To present Homes England Strategic Plan 2018/19-2022/23.

1.4 To provide details on the One Public Estate Phase 7 funding bid.

1.5 To note the ongoing work of the Historic Buildings Strategy Group.

2 Information

Policy publications – summary

2.1 In October and November 2018, the Government published several policy documents with implications for housing and planning across the City Region:

1. Geographical targeting against 5 funding programmes – policy statement by Ministry of Housing, Communities and Local Government (MHCLG)
2. Independent Review of Build Out Final Report by Sir Oliver Letwin
3. Planning reform: supporting the high street and increasing the delivery of new homes
4. Homes England Strategic Plan 2018/19 – 2022/23

2.2 There follows a summary of the key points of each publication (links to full versions are in Section 4: Background Documents) and an outline of potential implications for the Leeds City Region in relation to:

- Accessing future funding
- Town centres
- Collaborative working with Homes England

Geographical Targeting Against 5 Funding Programmes

2.3 Published by MGCLG on 30 October 2018, this policy statement details where funding is to be targeted over the next five years, including:

Fund	Purpose
Housing Infrastructure Fund (Forward Fund)	Funding for infrastructure to enable delivery on priority housing sites
Estates Regeneration Fund	Fund to accelerate and improve estate regeneration schemes through recoverable investments
Short term Home Building Fund	Direct finance for builders to boost supply of new homes
Small Sites Fund	Grant for local authorities and public landowners to deliver infrastructure for stalled smaller schemes
Land Assembly Fund	Homes England land investment fund - used to acquire land needing work and get it ready for the market, making it less risky for developers to invest in

2.4 The policy statement addresses affordability in those locations where it poses the greatest challenge, enabling homes to be built where they are most needed. Areas of highest affordability pressure will on average receive a minimum of 80% of total funding from these programmes over the next 5 years. Currently only Harrogate exceeds the median figure of 8.88, while much of the rest of the North will be below this threshold and therefore competing for a share of the remaining 20% of these five programmes. This does not affect affordable housing programmes.

2.5 In collaboration with other authorities, a press release was issued to express concern in terms of the message this policy direction gives to investors and communities in the North. The press release is in Appendix 1.

Independent Review of Build Out - Final Report by Sir Oliver Letwin

2.6 On 29 October 2018, the final report of Sir Oliver Letwin's Independent Review of Build Out was published. Its purpose is to explain the significant gap between housing completions and the amount of land allocated or permissioned in areas of high housing demand, and make recommendations for closing it. A briefing note covering the key points is in Appendix 2.

2.7 The report recommends ways in which the Government could increase the variety and differentiation of what is offered on large housing sites, raise the proportion of affordable housing, and raise the rate of build out. The review recommends new planning rules to encourage development, applicable to sites with outline permissions for 1,500 housing units or more.

Planning Reform: Supporting the High Street and Increasing the Delivery of New Homes

2.8 This consultation, published 29 October 2018, outlines proposals to reform the planning system to support the high street, make effective use of land and deliver more homes. A briefing note is in Appendix 3.

2.9 Of particular relevance, given the Combined Authority's focus on town centres, is the section on allowing greater change of use to allow high streets to adapt and diversify use. This would be done through changes to permitted development rights for changes in use classes and a relaxed approach to vertical extensions of properties.

2.10 The Combined Authority has responded to this consultation. The consultation focuses on changes to permitted development rights. As the Combined Authority is not a planning authority we are not directly impacted.

2.11 However, we have highlighted some concerns that the proposed changes will restrict the ability of the Local Planning Authorities to control the quality of the developments. This may result in low quality development that may undermine some of the City Region high quality city centre and gateway ambitions. A copy of the consultation cover letter is in Appendix 4.

Homes England - Strategic Plan, 2018/19 – 2022/23

2.12 Homes England Strategic Plan, launched on 30 October 2018, spans 5 years to 2022/23 and explains what Homes England will do to improve housing affordability, helping more people access better homes in areas where they are needed most.

2.13 The plan outlines Homes England's six strategic priorities for addressing the housing crisis:

- Unlock public and private land where the market will not, to get more homes built where they are needed;
- Ensure a range of investment products are available to support housebuilding and infrastructure, including more affordable housing and homes for rent, where the market is not acting;
- Improve construction productivity;
- Create a more resilient and competitive market by supporting smaller builders and new entrants, and promoting better design and higher quality homes;
- Offer expert support for priority locations, helping to create and deliver more ambitious plans to get more homes built. We would welcome clarity on where the 'priority locations' are; and
- Effectively deliver home ownership products, providing an industry standard service to consumers.

2.14 These priorities align with the Combined Authority's housing objectives and support their implementation through a partnership approach with Homes England, welcoming an opportunity to discuss and provide clarity on 'priority locations' in a City Region context.

2.15 A presentation by Homes England – Intervening in housing markets to increase housing supply – update to the City Region will be given as part of this report. A copy of the presentation is in Appendix 5.

Implications/Response for the Leeds City Region

2.16 Taken together, the documents outlined above indicate a direction that negatively impacts the North in terms of investment by government directing funding to deliver new homes to areas of highest demand. Further clarification is being sought from Homes England from a Leeds City Region perspective. If the 'right place' for government funding is defined as the least affordable local authorities by house price to earnings ratio, then there is a risk that much of the North would not attract much needed investment. Within the City Region, only Harrogate would qualify to compete for the majority (80%) of funding within the five funding streams. Prioritising funding is this way risks failing to solve the key issues within the housing market. It would fail to take advantage of the untapped potential to create new housing markets and create the conditions for economic growth in the North. It will also exacerbate overheating in the housing markets of the South and South East, where delivering new homes is more expensive.

2.17 This approach is also reinforced by the recommendation in the Independent Review of Build Out, that only local planning authorities with high housing demand (high house price/earnings ratio) should be given new statutory powers to improve build out on large sites.

2.18 In addition, investment in viable schemes will potentially expose a gap in funding for creating new markets, which is a significant issue for our strategic housing priorities in lower value areas.

2.19 This could have a significant impact on our ability to attract investment, particularly in areas with the most entrenched deprivation, where good quality housing is key raising living standards, and improving health and life outcomes.

2.20 Estate Regeneration funding (one of the 5 streams highlighted in the MHCLG policy note) has been critical in providing capacity to drive forward projects such as Beech Hill in Halifax, in combination with the Combined Authority investment to de-risk the sites. The funding provided additional support to enable feasibility studies and project manager resource to drive forward progress with delivery partners, Together Housing Group. This is a prime example of the Combined Authority investing alongside Homes England partners to drive forward projects at pace.

2.21 In response to Homes England's Strategic Plan, Councillor Hinchcliffe wrote to Sir Ed Lister (Chairman of Homes England) on 14 December 2018 requesting a roundtable discussion, accepting Homes England's invitation to work closely with ambitious authorities over the next five years. In response, a meeting has been arranged between Tom Walker, Deputy Chief Executive Officer at Homes England, and Combined Authority officers in February 2019.

2.22 The Combined Authority with district partners is already working closely with Homes England with the aim of sharing resource, knowledge and expertise across a shared agenda to coordinate delivery together. This shared working is already demonstrated through the City Region Strategic Sites Pipeline, which has been produced with Homes England and local authority partners.

2.23 The next step is to identify additional resource required to unlock further supply and explore the opportunity to work with Homes England to develop a joint approach to investment that would focus priorities and maximise benefit to our economy. This would be a collaborative, coordinated approach to deliver longer term investment in new homes and regeneration of our communities. As the Leeds Enterprise Partnership and transport authority delivering major infrastructure across the region, ensuring investment is complimentary is key to supporting investment programmes in housing.

2.24 Work continues to develop and strengthen the strategic conversations between the Combined Authority and housing associations (HAs) in the City Region. The inaugural meeting of the Leeds City Region Housing Association Partnership, is due to take place on 1 March 2019. This initiative will bring together for the first time the key stakeholders and HAs working across the city region to create a strategic mechanism for collaboration and partnership. It builds on similar models, for example housing compacts that exist in other City Regions. This does not replace discussions between individual districts and HAs on meeting housing need in local areas, rather adds to strategic planning across the City Region.

2.25 Leading housing associations continue to develop the proposal to form a joint venture company with the aim of becoming an additional developer in the City Region, one that can also work more closely with districts to achieve mixed tenure and deliver higher quality housing on strategic sites. The joint venture now has 5 housing associations as potential strategic partners including:

- Yorkshire Housing
- Together Housing Group
- Leeds Federated Housing Association
- Inncommunities
- Accent

2.26 Similar to the joint venture being developed in the Sheffield City Region, using the same advisory consultants, this is a 5 to 10 year commitment looking at larger sites, delivering additional housing on a mixed tenure basis including social housing. This also includes an investment return for the HAs involved.

Detailed work on the legal agreement for the joint venture and investigation of land options continues.

2.27 In addition, the Combined Authority is undertaking work to refresh the evidence base on housing in the City Region. This will help us to better understand and articulate the challenges of affordability faced in our housing market and to evidence the need for further intervention to improve quality and investment within the City Region and wider northern context. Further detail of this work will be brought to a future meeting.

One Public Estate (OPE) Phase 7

2.28 The opportunity to bid for OPE Phase 7 funding round was announced at the end of September 2018, with applications closing at the end of November. On 24 October 2018, Place Panel agreed that the Chair (Cllr T Swift) in liaison with the City Region Chief Executive lead for Housing and Planning (J Gedman) and the Combined Authority's Managing Director would agree the final submission for endorsement and submission by the Combined Authority.

2.29 The OPE partnership has expanded since the successful Phase 6 bid in November 2017. The West Yorkshire Combined Authority One Public Estate Partnership now includes representation from West Yorkshire and Harrogate STP Lead, Chief Executive of South West Yorkshire Partnership NHS Foundation Trust, the West Yorkshire Police Authority and the Department of Work and Pensions, alongside our 9 Local Authorities and the West Yorkshire Combined Authority.

2.30 The bid, submitted on 30 November, is for £442,500 (from a national pot of £15 million). It includes projects from Harrogate, Kirklees, the Combined Authority and a joint project between the National Health Service and the Combined Authority. The submission also includes £40,000 for programme management of the partnership.

2.31 In particular, Phase 7 opens up a significant partnership opportunity with the NHS, and other public sector partners, around enabling and accelerating the region-wide disposal of surplus public land for home building. The prospect of closer strategic ties and collaboration with the NHS has been bolstered by Jacqui Gedman's new role as Chair of the West Yorkshire Health and Housing Partnership.

2.32 If successful, it is anticipated that confirmation of a funding award will be received from OPE in March 2019.

Historic Buildings Strategy Group

2.33 One of the key recommendations in the West Yorkshire Textile Mill: Feasibility and Investment Framework (by Cushman and Wakefield), was the establishment of a Historic Buildings Strategy Group. The third meeting of the group, chaired by Cllr Tim Swift, took place on 4 December 2018.

2.34 A number of actions are being progressed, including:

- Districts to identify Priority Historic Buildings and Historic Places.
- Sharing good practice - examples of redevelopment of historic buildings and places - this has already included Dean Clough, Halifax and Newsome Mill, Kirklees.
- Compiling a database of developers and investors with an expertise or interest in this area of development.
- Historic England research into mill locations, condition and current use is ongoing. This work to be linked with Combined Authority infrastructure mapping as an additional layer.
- Mill Owners and Developers Event in spring 2019. Introducing owners to potential development partners, influencers, funders along with models of good practice. Detailed planning for this event will in early-2019.

3. Financial Implications

3.1 There are no financial implications directly arising from this report.

4. Legal Implications

4.1 There are no legal implications directly arising from this report.

5. Staffing Implications

5.1 There are no staffing implications directly arising from this report.

6. External Consultees

6.1 No external consultations have been undertaken.

7. Recommendations

Place Panel members are requested to:

(i) Note the emerging national housing and planning policy, direction of government policy and potential implications for the Leeds City Region.

(ii) Support further work to explore closer collaboration between the Combined Authority, districts and Homes England.

(iii) Note that the Combined Authority has submitted a response to the consultation on 'Planning Reform: supporting the high street and increasing the delivery of new homes'.

(iv) Note the details of the submission for One Public Estate Phase 7.

(v) Note the ongoing actions from the Historic Buildings Strategy Group.

8. Background Documents - Links to key policy documents

Geographical targeting across 5 housing funds
https://www.gov.uk/government/publications/geographical-targeting-across-5-housing-programme-funds

Letwin Review
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/752124/Letwin_review_web_version.pdf

Planning reform: supporting the high street and increasing the delivery of new homes
https://www.gov.uk/government/consultations/planning-reform-supporting-the-high-street-and-increasing-the-delivery-of-new-homes

Open Doors Pilot
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/754459/Open_Doors_prospectus.pdf

Homes England Strategic Plan
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/752686/Homes_England_Strategic_Plan_AW_REV_150dpi_REV.pdf

9. Appendices

Appendix 1: Press release from Core Cities on the Geographical targeting against 5 funding programmes

Appendix 2: Briefing on Independent Review of Build Out Final Report by Sir Oliver Letwin

Appendix 3: Briefing on Planning reform: supporting the high street and increasing the delivery of new homes

Appendix 4: Planning reform: supporting the high street and increasing the delivery of new homes Consultation Response Cover Letter

Appendix 5: Presentation by Homes England – intervening in housing markets to increase housing supply – update to Leeds City Region

APPENDIX 1

HOUSING INVESTMENT SKEWED IN FAVOUR OF SOUTH OF ENGLAND, NEW REPORT FINDS

NOVEMBER 2018

The distribution of roughly £7 billion of government investment in five separate housing programmes over the next five years is inconsistent across England, with areas across the South of the country disproportionately funded, according to a new report from Core Cities UK and the Key Cities Group.

The two bodies, which between them represent 30 key urban centres across England, Scotland and Wales including Birmingham, Bournemouth, Bristol, Leeds, Manchester, Newcastle and Salford, have analysed the Government's announcement that approximately 80% of allocated funds are to be channelled towards areas of "highest affordability pressure", largely in the South and East of England.

Local councils have spent recent weeks processing data released by the Ministry of Housing, Communities and Local Government (MHCLG) in late-October to support the Housing Infrastructure Fund Forward Fund, the Estates Regeneration Fund, the Home Building Fund, the Small Sites Fund and the Land Assembly Fund.

The figures show how applying the Government's definition, using a ratio of median house prices to median workplace-based household incomes, skews the allocation of around £5.6 billion available from these programmes. Core Cities UK and the Key Cities Group have established that this definition, when applied, favours the more affluent areas of the country.

The Mayor of Greater Manchester, Andy Burnham, said: "I am still trying to give the government the benefit of the doubt on its promises of a Northern Powerhouse but this map makes it very difficult.

"It is simply indefensible to shovel billions of pounds of public money into the more affluent areas when all parts of England are facing a housing crisis. The fact that only three areas north of the M62 will receive any benefit at all says everything.

"Such a skewed distribution of public money is demonstrably unfair and unacceptable. It overlooks the huge economic potential of the North of England and the Midlands, as well as several Southern English cities and coastal towns, and will fuel the economy where it is already strongest.

"Right now, the government should be working hard to bring our country back together rather than widening its economic and social divides. We need policies that will rebalance our economy and that are fair to people everywhere. That's why this policy cannot go unchallenged and I call on the government to think again."

Core Cities UK and the Key Cities Group have today published a colour-coded map which demonstrates in stark terms the imbalance of the funding proposal, with only three areas north of the M62 in receipt of significant investment.

Only four Local Authority areas in the North of England – and none in the North East - qualify for priority funding.

Cllr Judith Blake, Leader of Leeds City Council and Chair of Core Cities UK, said: “It is vital there is a fair approach to government housing investment across the country that recognises the range of challenges faced and the important role for all tenures of housing in creating sustainable and inclusive neighbourhoods. Only by ensuring diversity as well as pace in housing growth will we meet the needs of all residents and truly achieve the healthy and functioning local housing markets that government wants to realise.

“The way funding for housing and infrastructure is currently being prioritised is already putting many of our major towns and cities at a disadvantage. We should be moving away from competitive and ultimately counter-productive drivers of investment such as mortgage affordability and land value uplift towards a collaborative and place-based approach where national and local governments work together to tailor cross-tenure solutions to meet local demands and opportunities.

“The current proposal is likely to further consolidate the economic gaps between London, the South East and the rest of the country.”

Cllr Peter Box, Leader of Wakefield Council and Chair of Key Cities Group added: “We are particularly disappointed that areas that Key Cities represent appear to suffer as a result of this formula, particularly the North of England and the Midlands. We call on government to reconsider the methodology being used to calculate these grants.”

Twenty towns, cities and other urban centres belong to the Key Cities Group, with locations as geographically diverse as Blackpool and Bournemouth, Southampton to Sunderland.

Paul Dennett, the City Mayor of Salford and Greater Manchester Combined Authority (GMCA) lead on housing and homelessness, whose city forms part of the Key Cities Group, said: “It is perverse for Government to continue channelling new investment into the wealthiest areas of the country whilst leaving the North of England and the Midlands to wither on the vine.

“The North and the Midlands desperately need a new funding settlement with central government, recognising the need for serious and sustained investment in our infrastructure and services.

“There is no doubt that there are substantial issues facing the areas where affordability ratios are highest which justify investment in infrastructure and land supply.

“But by crudely prioritising investment as proposed, Government risks perpetuating and reinforcing the divides between different parts of the country, and failing to recognise the very real challenges of affordability and poor housing choices facing households across England as a whole.

“And there must be doubts about the achievability of Government’s stated ambition to deliver 300,000 homes every year if their investment in much of urban England is to be rationed in this way.”

Briefing Paper **APPENDIX 2**
November 2018

Independent Review of Build Out - Letwin Review (October 2018)

1. On 29th October 2018 Government published the Final Report of the Independent Review of Build Out carried out by the Rt. Hon. Sir Oliver Letwin. The Review was commissioned by the Chancellor of the Exchequer and was published to coincide with the Autumn Budget.

2. Aim of the Review

2.1 The purpose of the Review is to explain the significant gap between housing completions and the amount of land allocated or permissioned in areas of high housing demand, and make recommendations for closing it.

3. Draft Analysis (June 2018)

3.1 A Draft Analysis, published in June 2018, focused on the issue of the build out rate of fully permitted new homes on the largest sites in areas of high housing demand. This concluded that the homogeneity of the types and tenures of the homes on offer on these sites, and the limits on the rate at which the market will absorb such homogenous products, are the fundamental drivers of the slow rate of build out.

4. Key Recommendations of the Review

4.1 In reference to the 'Independent Review of Build Out' the Chancellor Phillip Hammond stated in his Autumn Budget speech "The [Letwin] Review found no evidence that speculative land-banking is part of the business model for major house builders, nor that this is a driver of slow build out rates".

4.2 The Final Report reiterates the conclusions of the Draft Analysis and recommends ways in which the Government could increase the variety and differentiation of what is offered on large housing sites, raise the proportion of affordable housing, and raise the rate of build out.

4.1 The review recommends that Government should:

- Adopt a new set of planning rules specifically designed to apply to all future large sites (initially those over 1,500 units) in areas of high housing demand, requiring those developing such sites to provide a diversity of offerings, in line with diversification principles in a new planning policy document; and
- Establish a National Expert Committee to advise local planning authorities (LPAs) on the interpretation of diversity requirements for large sites and to arbitrate where the diversity requirements cause an appeal as a result of disagreement between the LPA and the developer.

4.2 To increase the effectiveness of such proposals in the **near-term**, the Review recommends that Government should:

- Provide incentives to diversify existing sites of over 1,500 units in areas of high housing demand, by making any future government funding for house builders or potential purchasers on such sites conditional upon the builder accepting a Section 106 agreement which conforms with the new planning policy for such sites; and
- Consider allocating a small amount of funding to a 'large sites viability fund' to prevent any interruption of development on existing large sites that could otherwise become non-viable for the existing builder as a result of accepting the new diversity provisions.

4.3 To increase the effectiveness of such proposals in the **long-term**, the Review also recommends that Government should:

- Introduce a power for LPAs in places with high housing demand to designate particular areas within their local plans as land which can be developed only as single large sites, and to create master plans and design codes for these sites which will ensure both a high degree of diversity and good design to promote rapid market absorption and rapid build out rates;
- Give LPAs clear statutory powers to purchase the land designated for such large sites compulsorily at prices which reflect the value of those sites once they have planning permission and a master plan that reflect the new diversity requirements (with guidance for LPAs to press the diversity requirements to the point where they generate a maximum residual development value for the land on these sites of around ten times existing use value rather than the huge multiples of existing use value which currently apply); and
- Give LPAs clear statutory powers to control the development of such designated large sites through either of two structures:
    - **Local Development Company (LDC):** The LPA could use an LDC to carry out this development role by establishing a master plan and design code for the site, and then bringing in private capital through a non-recourse special purpose vehicle to pay for the land and to invest in the infrastructure, before "parcelling up" the site and selling individual parcels to particular types of builders/providers offering housing of different types and different tenures; or
    - **Local Authority Master Planner (LAMP):** The LPA could establish an LAMP to develop a master plan and full design code for the site, and then enable a privately financed Infrastructure Development Company to purchase the land from the LPA, develop the infrastructure of the site, and promote the same variety of housing as in the LDC model.

5. Additional Recommendations of the Review

5.1 The Report envisages that the Recommendations will in the long term require:

- Certain, limited amendments to primary legislation;
- A small amount of new secondary legislation (Amend the Town and Country Planning (Development Management Procedure)(England) Order 2015); and

- A new planning policy document setting out diversification principles (including housing type, size, style, design, tenure and intended occupant group, variants of which should be present in each phase of the development) that could be annexed to the National Planning Policy Framework and would deal exclusively with planning policy in relation to large sites in areas of high housing demand.

5.2 With regard to the recommendation for LPAs with high housing demand to designate particular areas within their local plans as land which can be developed only as a single large site. The Review suggests that there is scope for Homes England to provide substantial support for those LPAs including the provision of both funding and expertise that enables the LPA to build the capacity required for the establishment of suitable master plans, design codes and Section 106 agreements.

5.3 With regard to the recommendation to give LPAs clear statutory powers to control the development of designated large sites through an LDC/LAMP. The Review recommends that the LDC/LAMP should be enabled to apply for a small amount of seed funding potentially top-sliced out of the existing Ministry for Housing, Communities and Local Government Land Assembly Fund (following a change in the Government's remit for this fund).

5.4 Furthermore, the Review recommends that LPAs using LDC/LAMP vehicles should obtain clear Compulsory Purchase Order (CPO) powers over large sites that they have designated. The Review also suggests considering the possibility of giving LPAs such CPO powers in relation to large sites that have been allocated in their local plan in the past but which have not obtained outline permission after a long period has elapsed. This would provide a good way of unlocking such sites – as well as providing a way to ensure that they are developed in a diverse, rapid and well-designed manner.

5.5 The Draft Analysis (June 2018) found that more effective coordination between government departments, agencies and private sector operators was urgently required to improve and speed up the delivery of transport and utility infrastructure before the build out could start (and sometimes during the construction period) on large brownfield sites; but it concluded that this issue was not likely to impede the build out rate itself.

5.6 Further detail on the proposed 'National Expert Committee' and the LDC/LAMP delivery vehicles are provided in annexes to the Report.

6. Proposed Implementation Timeframe

6.1 The Review recommends that an adequate notice period should be given by Government for the implementation of its recommendations. If, for example, the Government decides to adopt the recommendations at the end of 2018, it suggests that it should be made clear that the new rules governing planning permission for large sites will come into force at the start of 2021, and will therefore govern any permissions granted for large sites on or after that date.

6.2 However, the Review also recommends that in order to maximise the chance of the new planning framework having a productive effect on sites which have, or by 2021 will have, received an outline permission, from 2021 onwards, Ministers should seek to provide incentives for house builders to accept changes to their existing site plans. This can be done through introduction of conditions to any government funding dependent upon the site being developed in conformity with the new planning policy and new secondary legislation for large sites.

7. Potential Implications for the Leeds City Region

7.1 The recommendations of the Review propose LPAs are given new statutory powers which could potentially amount to significant new levers by which to improve build out rates on large housing sites. However, this is reserved for LPAs with areas of high housing demand. The Review suggests that this be defined as 'areas with high ratios of median house prices to median earnings' (Para 3.8 Pg. 13). The Draft Analysis defines areas of very high housing demand as those 'measured by a ratio of more than seven to one between the median house prices and median earnings' (Para 2.2 Pg. 7).

7.2 In 2017 the median house price to median earnings for Partner Council Authority areas in the Leeds City Region were the following:

Partner Council	Housing Affordability Ratio
Harrogate	8.83
York	8.79
Craven	8.16
Selby	6.45
Leeds	6.04
Wakefield	5.82
Kirklees	5.36
Bradford	5.32
Calderdale	5.00
Barnsley	4.82

Table 1: Housing Affordability Ratio in 2017 (Ratio of median house price to median gross annual residence-based earnings)
Source: ONS, 2018

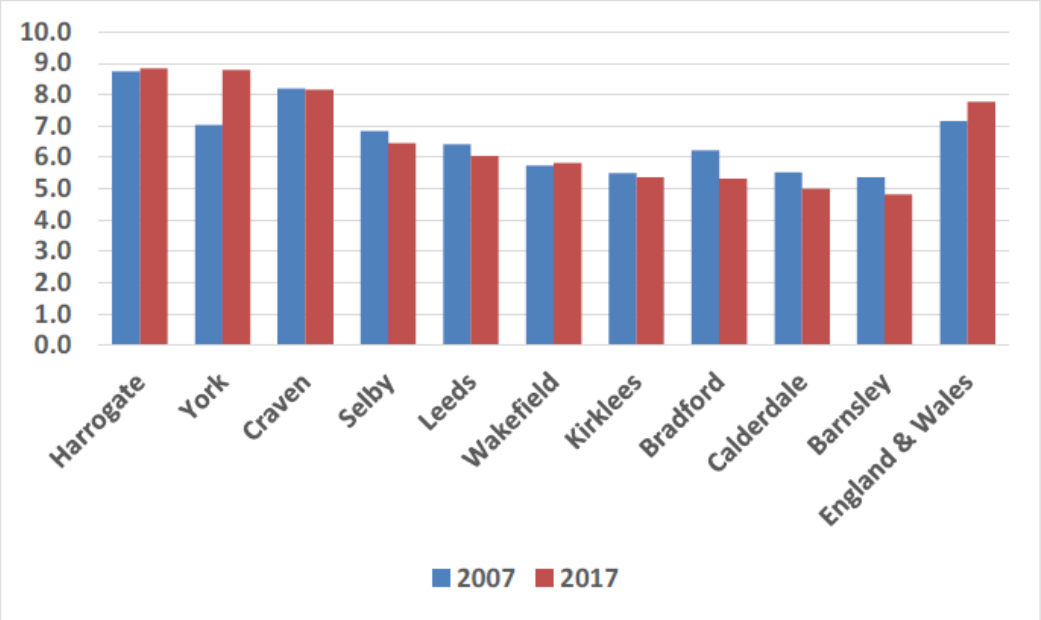

Figure 1: Affordability of house prices 2007 and 2017 – Ratio of local prices compared to local incomes. Source: ONS, 2018
(Reproduced from Leeds City Region, Housing Delivery Annual Monitoring Report Final Report (2018))

7.3 The Review's recommended planning rules are only applicable to sites with outline permissions for 1,500 housing units or over. The Leeds City Region Strategic Housing Sites Pipeline (Sept 2018)[1] identifies one individual housing site within the Leeds City Region which has outline planning permission to develop 1,500 housing units or more: Olympia Park in Selby.

7.4 However, there are 11 individual sites identified in the Sites Pipeline which potentially meet or exceed the 1,500 unit threshold but do not currently benefit from outline planning permission. Two of these sites are located in York and one in Harrogate. Therefore, as these Authority areas are deemed to be within areas of high housing demand, and above the housing unit threshold these LPAs may be applicable for the recommendations detailed in the Independent Review of Build Out.

8. Government Response

8.1 It is understood that the Government will respond to the Reviews proposals in the New Year.

[1] Please note that the Leeds City Region Strategic Housing Sites Pipeline (Sept 2018) does not include all housing sites within the City Region and therefore this is an indicative early assessment for the purpose of this Briefing Paper

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Briefing Paper **Appendix 3**
November 2018

Planning reform: supporting the high street and increasing the delivery of new homes (October 2018)

1. On 29th October 2018 the Ministry of Housing, Communities & Local Government published the consultation document 'Planning reform: supporting the high street and increasing the delivery of new homes'. The consultation period closes on 14th January 2019.

2. Aim of the Consultation

2.1 The government is consulting on proposals that are intended to *'allow greater change of use to support high streets to adapt and diversify, support extending existing buildings upwards to create additional homes, and speed up the delivery of new homes.'*

2.2 The consultation includes separate proposals in respect of:

- **Part 1**: new and amended permitted development (PD) rights and changes to use classes, including to support the regeneration of the high street and to extend existing buildings upwards to create new homes.
- **Part 2:** the disposal of surplus local authority land - rationalising and updating the rules which govern disposal of public land at less than best value.
- **Part 3:** a draft listed building consent order to support the work of the Canal & River Trust.
- **Part 4:** draft guidance on the compulsory purchase powers of new town development corporations

3. Permitted Development Rights and Use Classes

3.1 The Consultation is seeking views on;

Allow greater change of use to support high streets to adapt and diversify

3.2 The Consultation is proposing new PD rights to allow existing premises in typical high street uses to change to a wider range of uses, allowing more leisure and community uses such as gyms, libraries, health care and office use as well as homes. It is argued that PD rights for change from high street uses would provide a quicker more certain route to enable business to adapt and help town centres to remain vibrant.

3.3 The Consultation is proposing a new national PD right to allow Use Classes[1] A1, A2, A5, betting shops, pay day loan shop and launderettes to change to B1. It is also proposing to allow Use Class A5 to change to C3, as is already

[1] Shops: A1, Financial and Professional Services: A2, Hot Food Takeaways: A5, Office Use: B1, Residential Use: C3.

the case with the other uses listed in this paragraph. PD rights for change from high street uses would be subject to prior approval by the local planning authority.

3.4 The Consultation is proposing to extend the existing PD right for the temporary change of Use Class[2] from A1, A2, A3, A5, B1, D1, D2, Betting Shops and Pay Day Loan Shops to change to A1, A2, A3 or B1. The current right allows premises to change use for up to 2 years, enabling new business start-ups to test the market and help ensure premises are not left empty. The Consultation proposes that these premises should also be allowed to change to certain community uses: public library, exhibition hall, museum, clinic or health centre. It is proposed to extend the period of the temporary use from 2 to 3 years.

3.5 The Consultation also requests views on potential options to review the approach to Use Classes A1, A2 and A3, including replacing with a single use class, or reclassifying to a broader definition of uses.

Allow certain building types in particular uses to extend upwards to create additional new homes

3.6 The Consultation is proposing a new PD right, subject to prior approval by the local planning authority (LPA), to allow additional storeys (height limits apply) to be built above certain buildings, in particular those in commercial or residential use, to provide additional, well designed, new homes to meet local housing need. The new PD right would not apply in certain designated areas e.g. conservation areas.

3.7 National planning policy indicates that previously developed land and buildings should be effectively used, including the airspace above existing buildings, to create new homes. It is the intention that this right would provide additional new homes which fit within the existing streetscape, make effective use of land for housing, boost housing density in areas of high demand such as our town centres and high streets, increase footfall and prevent garden-grabbing.

Remove the existing right that allows the installation of, and advertising on, new public call boxes

3.8 It is proposed that the placing of public call boxes would now benefit from the greater consideration of their impact on the local amenity as would any accompanying adverts.

Increased size limits for off-street electric vehicle charging points

3.9 The Government's commitment is that by 2050 nearly all cars and vans should be zero emission vehicles. To support its delivery the Consultation

[2] Shops: A1, Financial and Professional Services: A2, Restaurants and Cafes: A3, Hot Food Takeaways: A5, Offices: B1, Non-Residential Institutions: D1, Assembly and Leisure: D2, Shops: A1, Financial and Professional Services: A2, Restaurants and Cafes: A3.

proposes to increase the existing size limits for electric vehicle charging points (from 1.6m to 2.3m) located in off-street parking areas (but not within the curtilage of a dwellinghouse) to facilitate rapid charging.

Make permanent two time-limited rights

3.10 The Consultation proposes to make permanent two time-limited PD rights (change of use from storage or distribution to residential use, and for larger single storey rear extensions to houses) that will currently cease to have effect in 2019.

Explore the feasibility of a new right to allow for the demolition of existing commercial buildings and their redevelopment as residential

3.11 The Consultation is seeking views on whether it would be feasible for a PD right to be designed that could allow for the redevelopment of a commercial site to create new homes.

4. Disposal of Local Authority Land

4.1 The Consultation proposes to extend local LPAs freedoms to dispose of surplus land at less than best consideration without seeking consent from the Secretary of State (SoS), thereby supporting local development objectives.

4.2 The purpose of these proposals is to streamline the involvement of the SoS in the regime that governs disposal of land by LPAs at an undervalue, i.e. for less than best consideration. This is intended to give LPAs greater flexibility to dispose of public land at an undervalue where doing so is considered to deliver wider economic, social or environmental benefits. This may, for example, help support local community initiatives and facilitate regeneration projects that deliver new housing, including the provision of affordable housing.

4.3 The SoS has issued a general consent in relation to land held for purposes other than housing or planning. It allows LPAs to dispose of such land at an undervalue of less than £2 million without seeking a specific consent where they consider it will help secure improvement of the economic, social or environmental well-being of the area.

4.4 The SoSs power to issue a general consent for the disposal of land held for planning purposes has not yet been exercised, but this consultation invites responses on whether it should now be switched on.

4.5 Some recently formed combined authorities have been given the same powers to dispose of land held for planning purposes as LPAs and any proposals taken forward as a result of this consultation would also apply to those combined authorities.

4.6 The Consultation document suggests that the existing £2 million threshold for disposals of land held for purposes other than planning or housing, set in

2003, is out of date because of increases in the value of land. A new undervalue threshold of £5 million, or alternatively £10 million, is proposed which would provide LPAs with substantially more flexibility to dispose of land without the involvement of the SoS. Additionally, the Consultation seeks views on whether a new general consent should contain any financial threshold at all.

5. Canal & River Trust: Draft Listed Building Consent Order

5.1 The Consultation proposes a listed building consent order which will allow minor, routine works to the Canal & River Trust's listed waterway structures without the need for individual listed building consent applications.

6. New Town Development Corporations – Draft Compulsory Purchase Guidance

6.1 The Consultation is seeking views on draft guidance on the compulsory purchase order (CPO) powers of new town development corporations, providing additional clarity to those with an interest in proposed new settlements.

6.2 The draft guidance sets out substantive government policy on how new town development corporations' CPO powers are to be used, and the policy factors which Ministers will take into account when deciding whether to approve new town CPO orders, including:

- Orders will be considered on their individual merits.
- New town development corporations' broad powers to acquire land and the specific statutory objects these powers serve.
- The potential benefits of assembling land early in the process.
- That new town development corporations may be justified in making a CPO order in advance of detailed proposals being developed and approved, given the scale and nature of new towns.

6.3 There are currently no new town development corporations within the Leeds City Region.

Planning Consultation
Planning Development Management Division
Ministry of Housing, Communities and Local Government
3rd floor, North East, Fry Building
2 Marsham Street
London
SW1P 4DF

14 January 2019

West Yorkshire Combined Authority Response: Planning reform: Supporting the high street and increasing the delivery of new homes

Thank you for the opportunity to comment on the 'Planning reform: Supporting the high street and increasing the delivery of new homes' consultation. We welcome the Government's commitment in the consultation to ensure that the planning system supports the creation of new businesses and homes. We are particularly interested in Part 1 of the consultation that deals with permitted development rights and use classes.

The West Yorkshire Combined Authority is not a strategic or local planning authority. It therefore has no statutory responsibilities relating to planning. However, the Leeds City Region Local Planning Authorities, some will be making individual responses to the consultation, are committed to partnership working to ensure a joined-up approach to spatial planning including tackling cross-boundary issues and agreeing strategic priorities set out in our Strategic Economic Plan (SEP).

The SEP has ambitious growth aspirations to develop and regenerate integrated Spatial Priority Areas (SPA), support employment, quality environments and the building of 10,000-13,000 new homes per year. Whilst the delivery of homes remains a priority, this should not be at the expense of developing high quality, well balanced environments that create a good place to live and work.

With respect to the consultation, part 1 deals with the permitted development changes. These include:

- The extension of changes between typical high street uses for existing premises for three years to include more leisure / community uses - gyms, libraries, health centre to continue enabling business start-ups and prevent empty premises.
- Changes from high street uses to office (B1) use and hot food takeaways to residential (C3) use.
- Upwards extension to a maximum building height of five storeys for certain existing buildings to provide "additional well-designed homes to meet local housing need."

- The potential for further storeys on free standing purpose built blocks of flats.
- Continued use of prior approval for changes to residential use to assess flooding / contamination risks; transport and highways and the impact of additional new homes on existing occupiers and businesses.
- Permanence of existing time limited PD rights for a change of use for buildings (up to 500sqm) from storage / distribution (B8) to residential (C3) use. Prior approval remains for transport and highways, contamination, air quality, noise and flooding, along with consideration of the impact residential use might have on nearby B8 or light industrial (B1(c)) uses.
- A new PD right for demolition of commercial buildings and redevelopment as residential, excluding development subject to Environmental Impact Assessment.

We share the concerns highlighted by the Local Government Association[1] (LGA) which identifies that the increase of permitted development rights reduces the ability of organisations, including the Combined Authority, to contribute in any meaningful way to the development process. It also reduces the possibility of generating added value either through the ability of a Local Planning Authority to negotiate reasonable amendments to make a scheme acceptable or through the ability to attract planning gain.

There is a risk that enhanced permitted development rights circumvent policies of the local authority local plans, compromise the objectives of locally developed masterplans and prevent the properly managed development of a place, thereby compromising the aims of the local authority local plans and the SEP. This may include the development of low quality, small residential units in town centres or larger change of use development in out of town sites with little regard to the suitability of the location and the long term implications for the regeneration of our town and city centres.

Appendix A contains responses to those questions of strategic relevance to the Leeds City Region. Should you require any further clarification on the issues raised please do not hesitate to contact me.

Yours sincerely,

Michael Long
Head of Planning Coordination
michael.long@westyorks-ca.gov.uk
0113 358 1718

[1] LGA permitted development order survey 2018 (https://www.local.gov.uk/sites/default/files/documents/Permitted%20development%20survey%202018%20-%20report%20FINAL_1.pdf)

Homes England

Making homes happen

Intervening in markets to increase housing supply: Update to LCR – 11 January 2019

A new agency

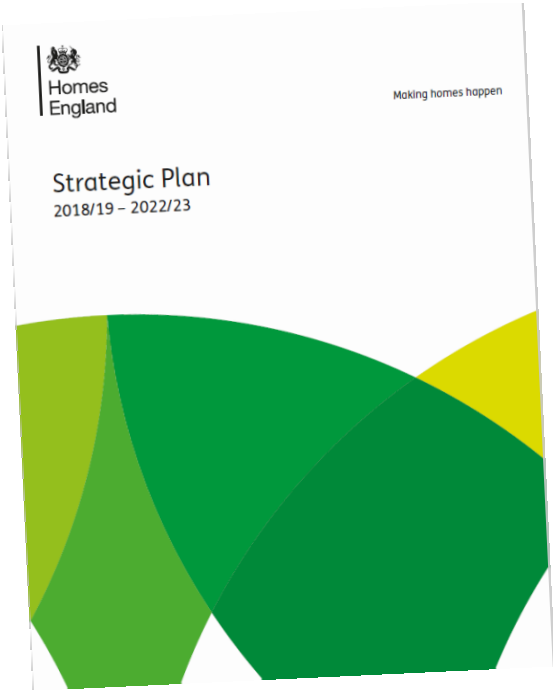
Who we are

We're the government's housing accelerator. We have the appetite, influence, expertise and resources to drive positive market change. By releasing more land to developers who want to make a difference, we're making possible the new homes England needs, helping to improve neighbourhoods and grow communities. So we welcome partners who share our ambition to challenge traditional norms and build better homes faster. Join us in breaking new ground to make this happen.

#makinghomeshappen

Our Strategic Plan

At Budget 2018, we published our five-year Strategic Plan explaining the steps we'll take, in partnership with the sector, to do this.



#makinghomeshappen

"The new Homes England is all about making homes happen – and our new 5-year plan sets out our ambitious new approach. We are committing to boosting housing supply, productivity, innovation, quality, skills and modern methods of construction to help make a more diverse and resilient market."

Nick Walkley, Chief Executive

#makinghomeshappen

Our mission and objectives

Our mission & objectives

Our mission is to intervene in the market to ensure more homes are built in areas of greatest need, to improve affordability.

We will make this sustainable by creating a more resilient and diverse housing market.

#makinghomeshappen

Unlocking land

We'll unlock public and private land where the market will not, in order to get more homes built where they are needed.

- Supporting the Government's target to release public land with capacity for 160,000 homes by 2020
- Using our acquisitions fund to unlock sites with fragmented ownerships
- Remediation through a new Small Sites Fund
- Providing experience and expertise as a master developer on large strategic sites

Unlocking land

"Despite Burgess Hill's huge potential to deliver more than 3,500 homes, development of this site had been stalled for over 10 years due to the complexities of land ownership and the need to deliver significant upfront infrastructure. We are delighted that Homes England has intervened to unlock this site".

Councillor Garry Wall

Leader of Mid Sussex District Council

Unlocking investment

We will ensure a range of investment products are available to support housebuilding and infrastructure, including more affordable housing and homes for rent, where the market is not acting.

Investment is needed to support:

- Housing associations, who need funding stability to leverage private finance
- The Private Rented Sector, where confidence is still low
- Smaller business and other parts of the sector considered higher risk or less commercially viable
- Infrastructure, where there can be a lack of commercial coordination and appetite

Unlocking investment

"The securing of this significant loan from Homes England has unlocked and accelerated the development of Skelton Gate and will enable us to commence the first phase of our groundworks and infrastructure programme with immediate effect.

"The vision for Skelton Gate has been developed over almost a decade with close collaboration between Homes England, Leeds City Council, as well as NHBC and we are now looking forward to commencing on site."

James Pitt,

Development Director at Evans Property Group

Improving productivity

We'll improve construction productivity.

- By incorporating MMC outcomes into our contracts for land and investment
- Through 7 pilot projects to test modular technologies, developer appetite and better understand costs
- Facilitating conversations across the industry to increase understanding and uptake of MMC

Improving productivity

"We're all incredibly excited about this project as it will see a wide range of homes and construction methods being tried and tested together on the one site. The support from Homes England is pivotal in helping us make the Gateshead Innovation Village vision a reality, building real homes for real people using the latest construction methods and technology".

Brian Ham

Executive Director of Development, Home Group

Driving market resilience

We'll create a more resilient and competitive market by supporting smaller builders and new entrants, and promoting better design and higher quality homes.

- SMEs now only account for 12% new homes compared to 40% in 1988
- Volume builders are important but cannot deliver the homes England needs alone.
- Greater diversity of supply will improve consumer choice and design.
- We are consulting with the FMB, HBF and others to improve access to our sites and development finance.

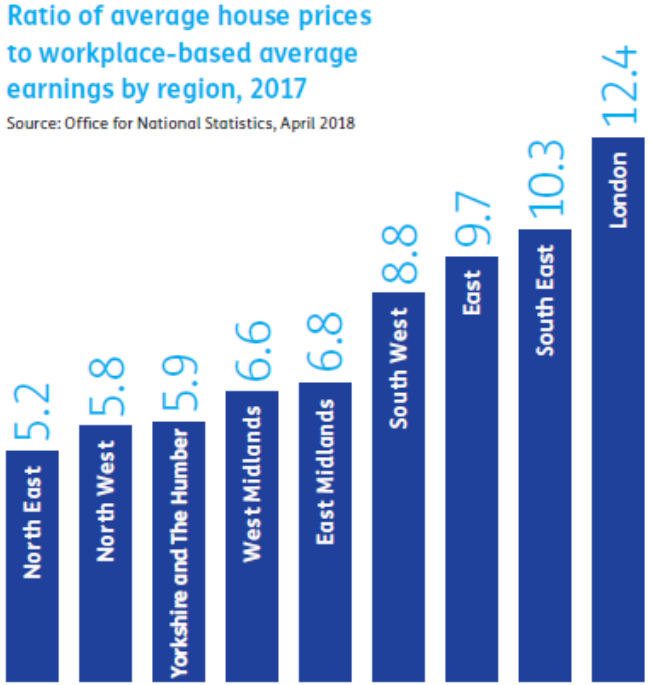
Driving market resilience

#makinghomeshappen

Supporting local areas

We'll offer expert support for priority locations, helping to create and deliver more ambitious plans to get more homes built.

- Local housing markets face local challenges so local leadership is crucial
- We'll target our intervention in places where high development potential has not yet been unlocked by the market
- Housing affordability is a problem throughout England where average house prices are now more than 8-times average earnings.



Delivering home ownership products

We'll effectively deliver home ownership products, providing an industry standard service to consumers.

- 415,000 households helped into home ownership since 2010 through Government-backed schemes Approx 200,000 UK households now live in shared ownership properties
- Help-to-Buy now extended to 2023 for first-time-buyers (with regional price caps)
- To date 8,136 homes have been supported by Help to Buy in LCR
- In 17/18 2,294 homes were supported by over £96million Help to Buy in LCR

Delivering home ownership products

"We have been working with Nick Walkley and the Homes England team to explore how we can collaborate to drive both scale and pace of housing delivery. We are delighted to have been selected as one of Homes England's strategic partners as it is a key element of our work. The combination of certainty and flexibility that the new approach offers gives us the confidence to accelerate our programme and deliver an additional 2,603 new affordable homes across the country and provides the cornerstone for our wider partnership working."

David Cowans,

Group Chief Executive of Places for People

#makinghomeshappen

Our ethos

Ambitious
We always strive for more and believe in better.

Collaborative
We work together to get things done.

Commercial
We're professionals who achieve value for money.

Creative
We're always thinking up new ideas and disrupting the status quo.

Diverse
We value everybody as an individual, and in their thoughts and ideas.

Learning
We can always do better, share what we know, and admit our mistakes.

Report to:	Place Panel
Date:	31 January 2019
Subject:	**Local Plan Update**
Director(s):	Alan Reiss, Director of Policy, Strategy and Communications
Author(s):	Michael Long / James Whiteley

1. Purpose of this report

1.1 To update to Place Panel on the progress and status of the Leeds City Region development plans.

2. Information

2.1 Each local planning authority must identify their strategic priorities and have policies to address these in their development plan documents. The National Planning Policy Framework states that strategic planning policies can be contained within a Local Plan.

2.2 In addition to the above, non-strategic planning policies may be adopted by Local Planning Authorities through a range of documents, such as Supplementary Planning Documents (SPDs) and Area Action Plans (AAPs). However, these are optional and the decision to undertake these are determined locally.

2.3 With the exception of City of York Council, all our partner councils have an adopted development plan in place. However, they are all at varying stages of updating their plans and their site allocations.

2.4 Since the last Place Panel, Barnsley Metropolitan Borough Council have adopted a new Local Plan on 3 January 2019 following examination by the Planning Inspectorate. In addition, Harrogate Borough Council are currently undertaking Examination Hearings into their emerging Local Plan.

2.5 **Appendix 1** provides details of the most pertinent documents which contribute to the development plan of partner councils in the City Region and therefore the list is not exhaustive.

3. Financial Implications

3.1 There are no financial implications directly arising from this report.

4. Legal Implications

4.1 There are no legal implications directly arising from this report.

5. Staffing Implications

5.1 There are no staffing implications directly arising from this report.

6. External Consultees

6.1 No external consultations have been undertaken.

7. Recommendations

7.1 To note the contents of the report.

8. Background Documents

None.

9. Appendices

Appendix 1 – Leeds City Region Development Plans' Status Update

LCR DEVELOPMENT PLANS' STATUS UPDATE (Revised January 2019)

Barnsley	Adopted Local Plan	Adopted 3 January 2019
	Statement of Community Involvement (SCI)	Adopted September 2015
	Joint Waste Plan: BMDC, DMBC, RMBC	Adopted March 2012
	Community Infrastructure Levy (CIL)	CIL (Draft Charging Schedule) consultation November 2016. Not progressing to examination.
Bradford	Adopted Core Strategy	Adopted 18 July 2017
	Emerging Core Strategy (Partial Review)	Issues & Options: November 2018, Preferred Option: May 2019, Publication Draft: January 2020, Submission: July 2020, Examination: October 2020, Adoption: December 2021
	Statement of Community Involvement (SCI)	Adopted 6 November 2018
	Emerging Site Allocations DPD	Commenced with Issues and Options in May/July 2016.
		Preferred Option: May 2019
		Publication Draft: January 2020, Submission: July 2020, Examination: October 2020, Adoption: December 2021
	Community Infrastructure Levy (CIL)	Adopted 21 March 2017
	Bradford City Centre AAP	Adopted 12 December 2017
	Shipley & Canal Road Corridor AAP	Adopted 12 December 2017
	Waste Management DPD	Adopted 17 October 2017
	Street Design Guide	Commencement: August 2018, Public consultation: February 2019, Expected Adoption: June 2019
	Housing Design Guide	Commencement: August 2018, Public consultation: February 2019, Expected Adoption: June 2019
Calderdale	Adopted Unitary Development Plan	Adopted 25 August 2006 Amended August 2009
	Emerging Local Plan	Consultation on "Potential Sites and Other Aspects of the Local Plan" from Nov 2015 to end Feb 2016;
		Further consultation August 2017 to October 2017 on a full Initial Draft Local Plan (Reg 18)
		Revised Local Development Scheme agreed by Cabinet December 2017
		Publication Draft Consultation: August to September 2018
	Statement of Community Involvement (SCI)	Adopted April 2016
	Community Infrastructure Levy (CIL)	Draft Charging Schedule Consultation: August to September 2018
Craven	Adopted Local Plan	Adopted July 1999
	Emerging Local Plan	Early engagement June / July 2013
		Consultation from 3rd Nov on pre-publication draft
		Draft Local Plan 2016
		Publication Plan Jan 2018
		Submitted for Examination: March 2018
		Expected Adoption: March 2019
	Statement of Community Involvement (SCI)	Adopted March 2018
	Affordable Housing SPD	Consultation: 2019, Adoption: 2019
	Householder Development SPD	Consultation: 2019/20, Adoption: 2019/20
	Sport and Recreation SPD	Consultation: 2019/20, Adoption: 2019/20
	Rural Workers' Dwellings SPD	Consultation: 2020, Adoption: 2020
	Flood Risk SPD	Consultation: 2020, Adoption: 2020
Harrogate	Adopted Core Strategy	Adopted Feb 2009
	Emerging Local Plan	Publication Draft Consultation: January - March 2018 Submitted: August 2018, Examination: January - February 2019, Adoption: Spring 2019

	Statement of Community Involvement (SCI)	Adopted March 2014
	New Settlement DPD	Publication Draft: Spring/Summer 2019, Submission: Winter 2019/20, Examination: Spring/Summer 2020, Adoption: Autumn 2020
	Provision for Open Space in Connection with New Housing SPD	Adoption: 2018
	Sustainable Transport SPD	Adoption: 2019
	Renewable and Low Carbon Energy SPD (update)	Adoption: 2019
	Green Infrastructure SPD (update)	Adoption: 2019
	Community Infrastructure Levy (CIL)	Preliminary Draft Charging Schedule consultation: May – July 2018, future stages as yet undetermined
Kirklees	Adopted Unitary Development Plan (Saved Policies)	Adopted 1 March 1999 A number of policies were 'saved' on 27 September 2007
	Emerging Local Plan (including allocations)	Submitted for examination April 2017
		EiP currently underway: Proposed Modifications Consultation: August – October 2018
		Expected Adoption early 2019
	Statement of Community Involvement (SCI)	Adopted 22 September 2015
	Community Infrastructure Levy (CIL)	Submitted for examination April 2017
		CIL charging schedule hearings delayed until February 2019
		CIL Adoption expected Summer 2019
	Huddersfield and Dewsbury Town Centre AAPs	Consultation: late 2018 onwards
	Hot Food Take-Aways SPD	Preparation: late 2018 onwards
	Quality Places SPD	Preparation: late 2018 onwards
	Highway Design Guide SPD	Consultation currently underway. Estimated Adoption: early 2019
Leeds	Adopted Core Strategy	Adopted Nov 2014
	Emerging Site Allocations	Submitted May 2017
		Revised Submission Draft Consultation Jan to Feb 2018
		Re-submission for Examination: March 2018
		Expected Adoption: Summer 2019
	Emerging Core Strategy Selective Review	Revised housing requirement, plan period, housing standards, affordable housing, greenspace and update to address abolition of CSH Publication Draft Consultation February 2018
		Submitted for Examination: August 2018
		Examination: Winter 2018/19, Expected Adoption: 2019
	Statement of Community Involvement (SCI)	Adopted February 2007
	Natural Resources & Waste DPD	Adopted January 2013
	Community Infrastructure Levy (CIL)	Adopted Nov 2014, Implementation 6th April 2015
	Aire Valley Leeds AAP	Adopted November 2017
	South Bank Leeds Regeneration Framework SPD	Adopted July 2018
Selby	Adopted Core Strategy	Adopted October 2013 (Supreme Court appeal refused)
	Emerging Site Allocations Plan - PLAN Selby	Draft Site Allocations – Summer 2017
		Additional Sites Consultation: March – April 2018
		Expected Adoption: 2019
	Emerging New Local Plan	Expected - Policy Options: 2023, Publication Draft: 2024, Submission: 2025, Examination: 2026, Adoption: 2027
	Emerging Development Management Policies Plan	Expected - Policy Options: 2019, Publication Draft: 2020, Submission: 2020, Examination: 2021, Adoption: 2021
	Statement of Community Involvement (SCI)	Adopted December 2007
	Community Infrastructure Levy (CIL)	Adopted January 2016

Wakefield	Adopted Core Strategy & Dev. Policies	Adopted 2009
	Emerging New Local Plan (Policies and Site Allocations)	Early Engagement Consultation: October-December 2017
		Site Options Technical Consultation: April 2018
		Initial Draft Local Plan Consultation January 2019
	Statement of Community Involvement (SCI)	Adopted November 2017
	Waste	Adopted 2009
	Sites Specific Policies	Adopted September 2012
	Central Wakefield AAP	Adopted 2009
	Retail & Town Centre SPD	Adopted Jan 2017.
	Leisure, Rec. & Open Space SPD	Adopted Jan 2017.
	Community Infrastructure Levy (CIL)	Adopted 20 January 2016; Implemented 1 April 2016
York	Draft Local Plan	April 2005 (Incorporates the 4th Set of Changes)
	Emerging Local Plan	Preferred Sites Consultation 18 July – 12 September 2016
		Pre Publication draft Local Plan (Re. 18) Consultation: Sept – Oct 2017
		Publication draft Consultation (Regulation 19): Feb / March 2018
		Submission made to the Secretary of State May 2018
		Examination in Public – expected early 2019
	Statement of Community Involvement (SCI)	Adopted December 2007
North Yorkshire	Adopted Minerals Local Plan (Saved Policies)	Adopted 1997 A number of policies were 'saved' on 27 September 2007
	Adopted Waste Local Plan (Saved Policies)	Adopted 2006 A number of policies were 'saved' on 30 December 2008
	Emerging Minerals & Waste Joint Plan NYCC, NYMNP & CYC	EIP currently underway
	Statement of Community Involvement (SCI)	Adopted 2013
	Marine Aggregates Study	Draft Nov 2013, Finalised May 14

Core Documents
Optional Documents

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Report to:	Place Panel
Date:	31 January 2019
Subject:	**WEST YORKSHIRE LOCAL AGGREGATE ASSESSMENT 2018**
Director(s):	Alan Reiss, Director of Policy, Strategy and Communications
Author(s):	Michael Long / Carole Howarth (City of Bradford MDC)

1. Purpose of this report

1.1 To provide the Place Panel with an update and to note the emerging West Yorkshire Local Aggregate Assessment 2018 (WY LAA). This paper proposes that Place Panel recommend that the respective planning authorities take the WY LAA 2018 through their own approval processes.

2. Information

2.1 Production of the WY LAA is coordinated by the Combined Authority on behalf of the West Yorkshire planning authorities. The Combined Authority is not a Mineral Planning Authority and is therefore not required to sign the WY LAA.

2.2 The WY LAA is a technical paper to consider demand and supply of aggregates, and flag potential issues in this regard. It is a joint evidence paper to be utilised by authorities to support their local plan work and to support the assessment of planning applications.

2.3 The West Yorkshire partner councils agreed in 2013 to work together to produce an annual WY LAA. Since 2013, the production of a WY LAA has been coordinated by the Combined Authority for the purposes of progressing partner councils Local Plans and to assist in the determination of planning applications, and providing joint evidence for the Combined Authority for the Strategic Economic Plan and emerging Local Inclusive Industrial Strategy.

2.4 Paragraph 207 of the National Planning Policy Framework (NPPF) states that Mineral Planning Authorities (MPA) should plan for a steady and adequate supply of aggregates by (amongst other measures):

- Preparing an **annual Local Aggregate Assessment (LAA),** either individually or jointly by agreement with one or more other MPAs, 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); and
- Participating in an **Aggregate Working Party (AWP)** and taking the advice of the AWP into account when preparing their LAA.

2.5 The full WY LAA is included in Appendix 1.The main points to note are:
- There remains a clear and continuing link between housing and aggregate sales/need;
- A large proportion of the crushed rock aggregate produced in West Yorkshire is unsuitable for higher specification uses, such as concrete making and roadstone;
- West Yorkshire produces very little sand and gravel;
- West Yorkshire has a continuing high dependency upon neighbouring authorities for the majority of its construction aggregate needs. In particular from North Yorkshire, Doncaster and high specification sandstone aggregates from the Yorkshire Dales National Park;
- There is concern regarding the continued supply of high specification aggregate from the Yorkshire Dales National Park, as the draft North Yorkshire LAA 2018 states that “potential for reserves of high quality polished stone value (PSV) aggregate in the Yorkshire Dales National Park to be significantly reduced in the mid-term”;
- There is concern regarding potential shortfalls of supply of both sand and gravel and magnesian limestone identified within the North Yorkshire LAA; and
- There remains a pressing need for a shift from the transportation of aggregates by road to other modes of transport (in particular rail).

3. Financial Implications

3.1 There are no financial implications directly arising from this report.

4. Legal Implications

4.1 There are no legal implications directly arising from this report.

5. Staffing Implications

5.1 There are no staffing implications directly arising from this report.

6. External Consultees

6.1 Stakeholder consultation has been undertaken (i.e the minerals industry and other relevant Minerals Planning Authorities).

7. Recommendations

7.1 To note the contents of the WY LAA 2018 and to recommend that the respective planning authorities take the WY LAA 2018 through their own approval processes.

8. Background Documents

None.

9. Appendices

Appendix 1 - Draft WY Local Aggregate Assessment 2018

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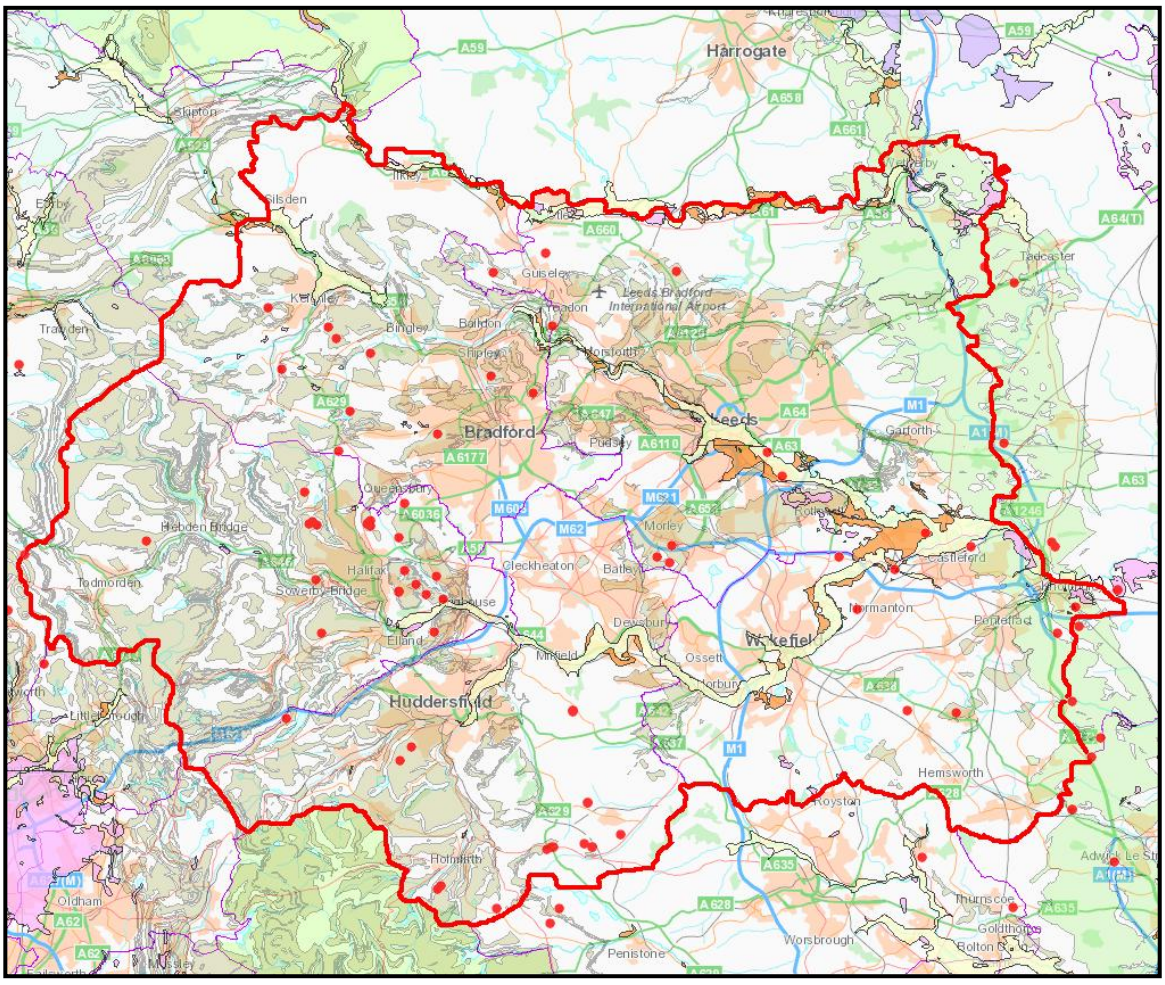
West Yorkshire Combined Authority

West Yorkshire Local Aggregate Assessment 2018 (2017 Data)



City of Bradford MDC www.bradford.gov.uk | Leeds City Council | wakefieldcouncil | Kirklees Council | Calderdale Council

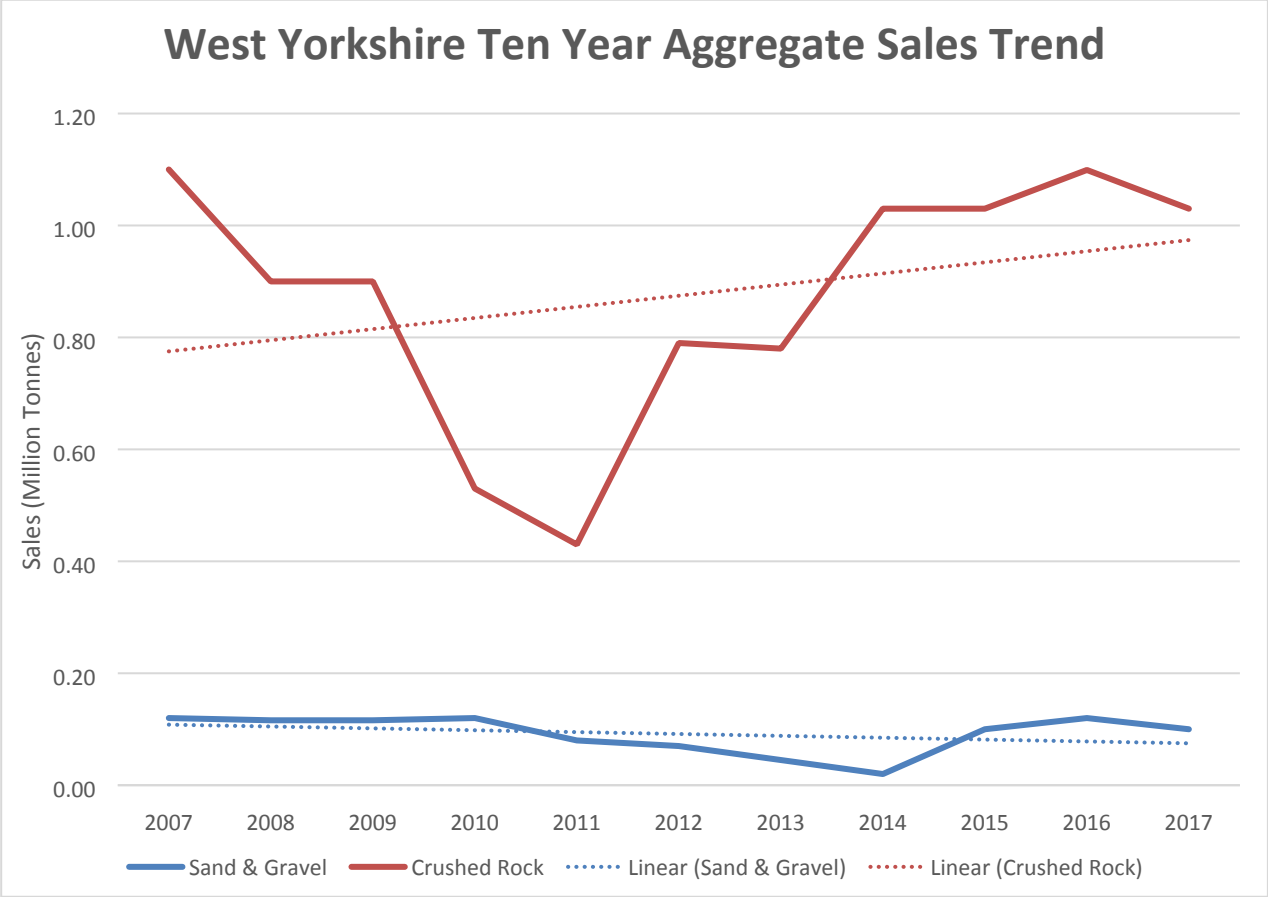
Contents

EXECUTIVE SUMMARY

This document is the sixth of the annual Local Aggregate Assessments (LAA) coordinated by the West Yorkshire Combined Authority on behalf of the five West Yorkshire Mineral Planning Authorities of: Leeds, Bradford, Kirklees, Wakefield and Calderdale. An LAA is an annual report designed to provide evidence to support both the Minerals Industry and Mineral Planning Authorities in planning for the future provision of aggregates. The LAA should be updated annually and this document represents the West Yorkshire Local Aggregate Assessment 2018, incorporating 2017 data.

The LAA 2018 finds that the position with sand and gravel has not altered substantially, with the small reserve of sand and gravel within West Yorkshire continuing to be progressively worked out at a steady rate. Further reserves will need to be released if any primary sand and gravel extraction is to continue in West Yorkshire substantially beyond 2025. Crushed rock aggregate extraction remains at the relatively high level established since 2014 of over 1 million tonnes per annum, with reserves also remaining relatively healthy. Chart EF1 illustrates the 10 year aggregates sales trend for West Yorkshire.

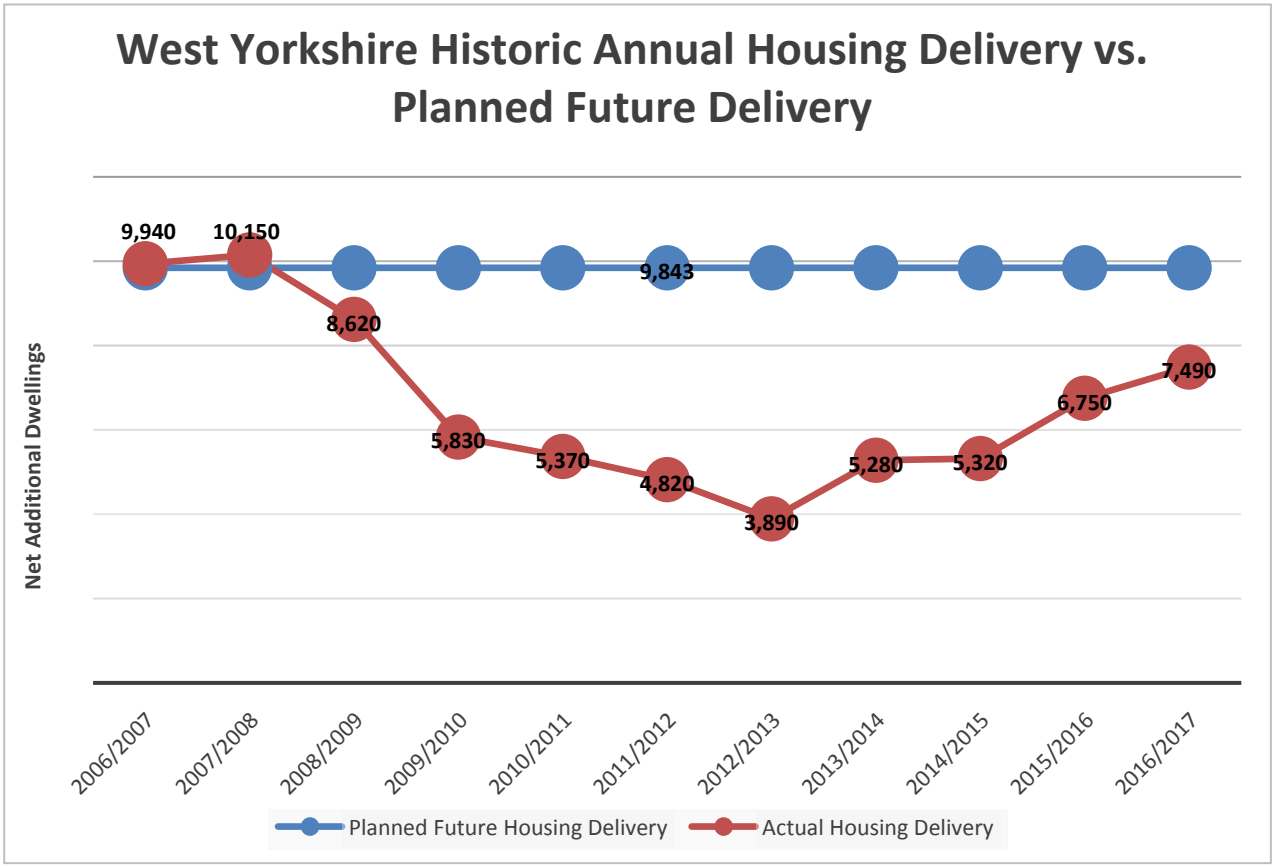
EF1



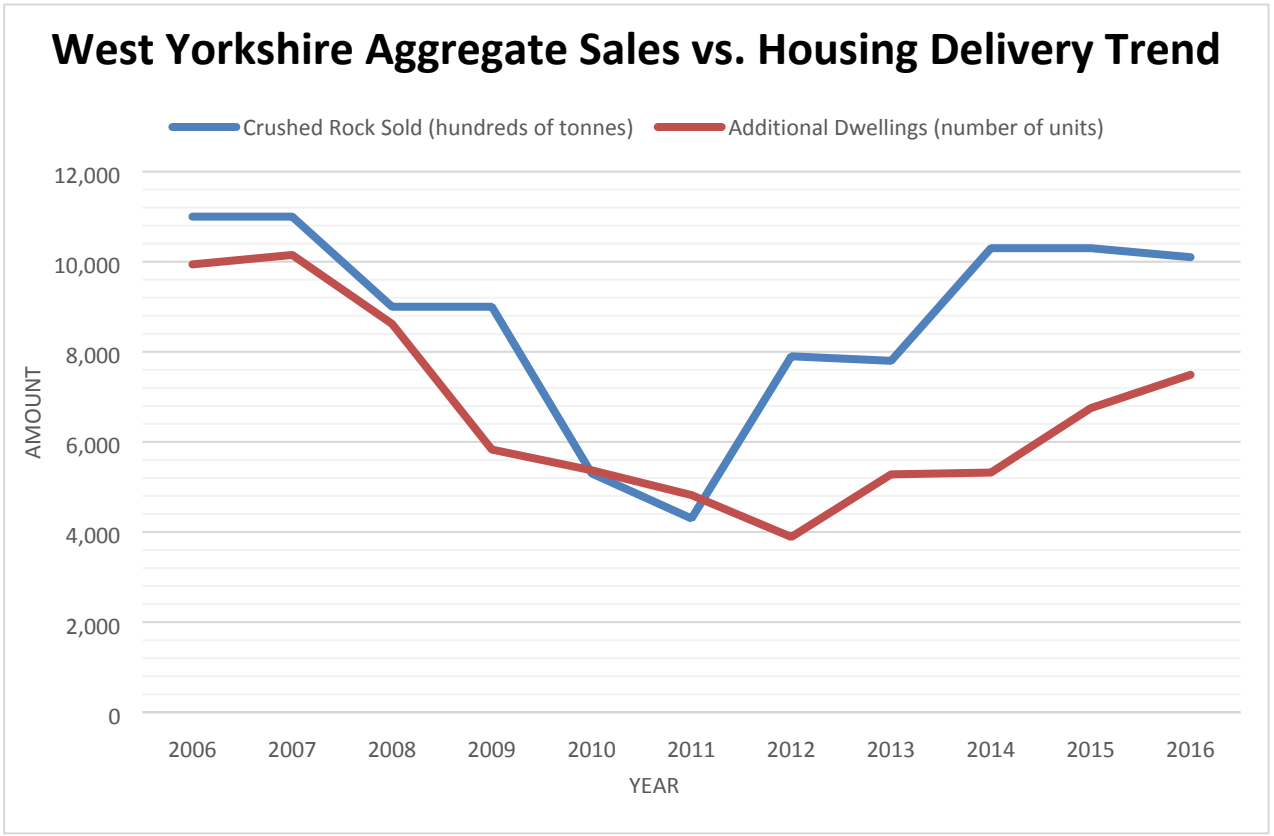
Ten year sales averages alone are not considered to be adequate to use as the basis for calculating the aggregate landbank for West Yorkshire. This is primarily because West Yorkshire Local Planning Authorities are planning for a significant increase in house building in the future, as illustrated by chart EF2. This remains the case despite recent changes to housing need forecasting leading to reduced housing delivery targets in

emerging new Local Plans. A strong relationship is apparent between housing delivery and aggregate production, as shown by chart EF3.

EF2



EF3



Therefore an uplift factor has been applied to the 10 year aggregate sales average for the purpose of calculating the West Yorkshire Aggregate Landbank. This uplift represents an estimate of the increase in aggregates sales which would be required to deliver on planned future housing growth and associated infrastructure demands. The calculated landbanks, adjusted in accordance with the uplift methodology described in this report, are shown in the table below.

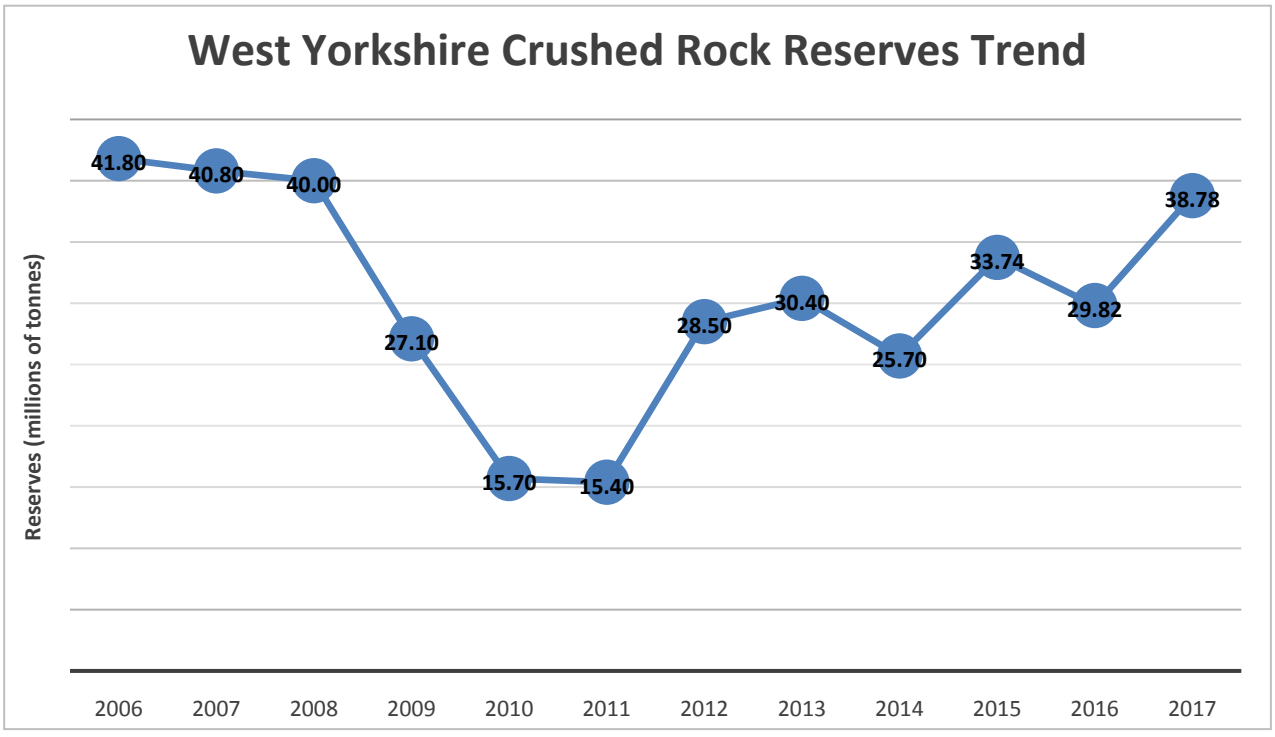
West Yorkshire Aggregate Landbanks 2017

Note: All Figures in Tonnes Unless Otherwise Stated	Reserve	Annual Sales Average 2008-2017	27.5% Uplifted Aggregate Apportionment	Landbank
Sand & Gravel	670,000	90,000	110,000	**6 Years 1 Months**
Crushed Rock	38,780,000	850,000	1,080,000	**35 Years 11 Months**

The Sand and Gravel landbank of **6 Years and 1 Month** is below the minimum landbank required by paragraph 207 of the National Planning Policy Framework (NPPF), indicating that the release of additional reserves is required. Sand and gravel reserves and extraction rates in West Yorkshire remain very low. The vast majority of the sand and gravel which is consumed within West Yorkshire is sourced from neighbouring mineral planning authorities, primarily North Yorkshire.

The crushed rock aggregate landbank of **35 Years and 11 Months** is significantly greater than the 10 year minimum level required by the NPPF. However, as illustrated by the chart below, crushed rock reserves remain below pre-recession levels and should not therefore necessarily be seen as excessive or problematic, particularly in light of West Yorkshire's dependence upon neighbouring regions for the supply of higher specification crushed rock aggregates.

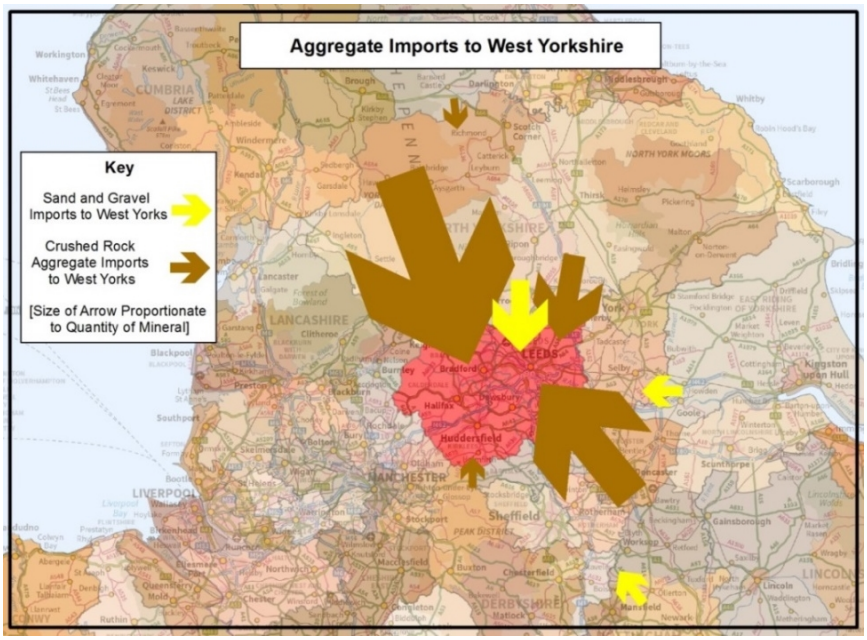
EF4



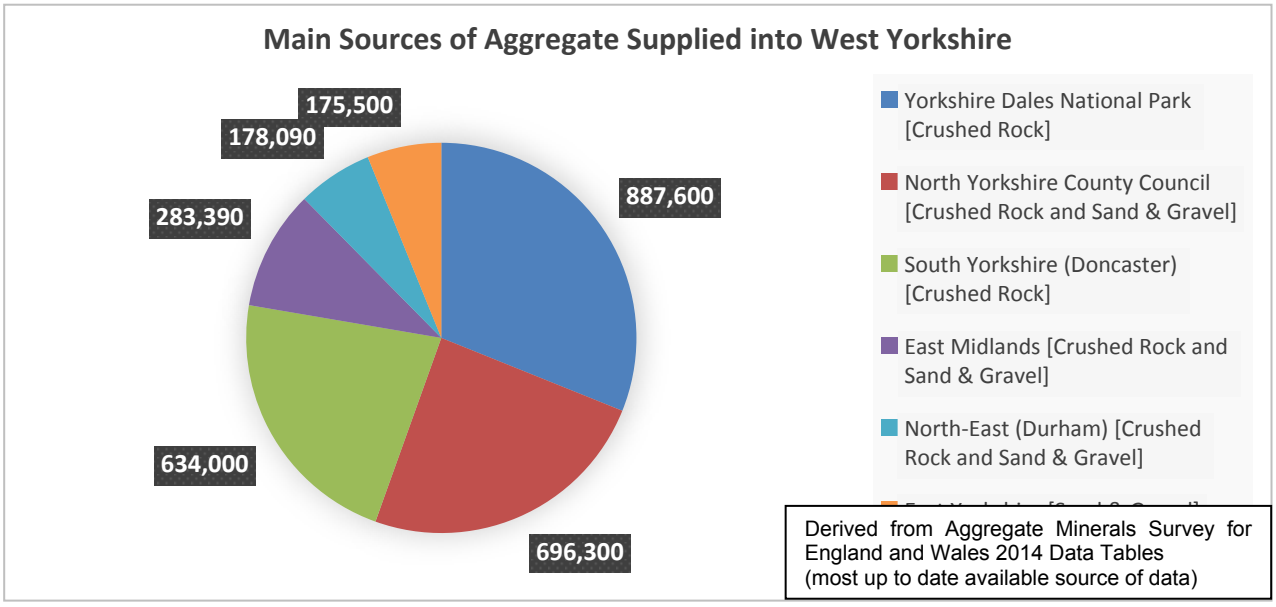
According to the *Collation of the results of the 2014 Aggregate Minerals survey for England and Wales* the majority of the crushed rock aggregate produced in England and Wales is used for either road construction (34% in 2014) or as concrete aggregate (17% in 2014). For geological reasons described in more detail elsewhere in this report, the stone resources which are worked within West Yorkshire are generally thought to be incapable of producing significant quantities of the higher specification crushed rock aggregates required for use in either road construction or concrete manufacture. Therefore West Yorkshire will remain reliant upon the crushed rock aggregates produced in neighbouring authorities to meet the majority of its construction aggregate needs.

Figure EF5 illustrates the approximate route and scale of aggregate flows into West Yorkshire, with further details provided in the Pie Chart EF6. In terms of crushed rock aggregates the two principal sources are the Yorkshire Dales National Park and Doncaster. Quarries from these 2 areas collectively provided for over half of the crushed rock aggregates consumed within West Yorkshire in 2014 according to the data tables provided by the BGS in association with 2014 Aggregate Minerals survey.

EF5



EF6



In addition to the length of aggregate landbanks, Mineral Planning Authorities, including West Yorkshire Authorities and those neighbouring authorities who supply significant quantities of aggregate into West Yorkshire, should also consider other relevant information when assessing the need for the release of additional aggregate reserves. **The Key Messages** and relevant considerations when assessing proposals and allocations for minerals development and associated infrastructure are:

i. **Additional aggregate supplies will be required-** Although housing delivery is generally significantly improving within West Yorkshire and household growth forecasts are general falling there remains a substantial gap between the number of houses being built and the objectively assessed need for new housing; additional aggregate supplies will be required if this gap is to be filled.

ii. **West Yorkshire currently makes a low contribution** to the overall supply of construction aggregates within the Yorkshire and Humber Region, particularly in relation to sand and gravel.

iii. **Sand and gravel** reserves and production remain at a **very low level** within West Yorkshire.

iv. **Release of new reserves is required**- The current landbank of sand and gravel reserves is at a level which indicates that the release of new reserves is required.

v. **Crushed rock reserves remain relatively high within West Yorkshire-** however a substantial proportion of the currently permitted reserves are **unsuitable for higher specification uses**, such as for the manufacture of concrete or as roadstone;

vi. **West Yorkshire remains reliant on neighbouring Mineral Planning Authorities-** primarily the administrative areas regulated by the Yorkshire Dales National Park Authority, North Yorkshire County Council and Doncaster Council, to meet the majority of its aggregate needs, particularly for uses which demand higher specifications.

vii. **West Yorkshire remains strongly reliant on the Yorkshire Dales National Park-** To meet its need for aggregate suitable for use as skid resistant road surfacing, West Yorkshire remains strongly reliant upon supplies of high specification (low Polished Stone Value) sandstone aggregates extracted from quarries located within the Yorkshire Dales National Park.

viii. **Sustainable opportunities to increase the supply in West Yorkshire**- Notwithstanding the extent of the crushed rock aggregate landbank, given West Yorkshire's reliance on adjoining authorities for higher specification aggregates, any sustainable opportunities to increase the supply of the generally lower specification aggregates produced within West Yorkshire should be considered upon their merits.

ix. **Increase Recycled Aggregates-** Providing new and enhanced facilities for the production of recycled aggregates will help to compensate for West Yorkshire's economic dependence upon primary aggregates quarried from neighbouring authorities.

x. **Building Sand from Sandstone Quarries-** Production of sand from crushed rock at sandstone quarries in West Yorkshire, including building stone quarries, is a valuable additional/ alternate source of sand supply, particularly building sand.

xi. **Safeguarding Rail and Wharves-** Existing rail and wharf infrastructure should be safeguarded and potential new locations for wharves and rail depots should be identified within West Yorkshire to facilitate the sustainable transportation of both land won and marine aggregates into West Yorkshire in the future, particularly crushed rock aggregates from the Yorkshire Dales and marine aggregates landed at the Humber Docks.

1. INTRODUCTION/ BACKGROUND

1.1. Background

1.1.1. Minerals are important to the local and national economy and underpin the fabric of our everyday lives. Uses of minerals range from building stones, to brick clay, to chemical and construction aggregates. Maintaining continuity of supply of construction aggregates is particularly vital to the economic wellbeing of the country and therefore the English planning regime provides for a managed aggregate supply system based upon Local Aggregate Assessments (LAAs).

1.1.2. According to the requirements of the National Planning Policy Framework (NPPF), all of the local authorities within England which have responsibilities for minerals planning (Mineral Planning Authorities – MPAs) are required to 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, and an assessment of all supply options (including marine dredged, secondary and recycled sources);
- participating in the operation of an Aggregate Working Party and taking the advice of that party into account when preparing their Local Aggregate Assessment.

1.1.3. National Planning Practice Guidance confirms that a Local Aggregate Assessment should contain three elements:

- 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 aggregate 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 aggregate 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.

1.1.4. In addition to the government's planning practice guidance it should be noted that the Planning Officers' Society and the Mineral Products Association jointly published a Practice Guidance Document on the Production and Use of Local Aggregate Assessments in April 2015, updated in May 2017. Although non-statutory this document provides a very useful health check to ensure the robustness of an LAA.

1.1.6. This LAA document has been prepared in accordance with the guidance referred to above and represents the sixth annual LAA coordinated by the West Yorkshire Combined Authority on behalf of the five West Yorkshire Local Authorities: Bradford, Leeds, Wakefield Kirklees and Calderdale. Each of the five West Yorkshire Authorities are Unitary Planning Authorities, who are independently responsible for Minerals Planning in their respective parts of the West Yorkshire sub-region.

1.1.7. Naturally occurring aggregate minerals in West Yorkshire are limestone, sandstone and sand & gravel. It is the future provision of these minerals with which this assessment is concerned. The LAA is intended to provide evidence to inform both MPAs, in exercising their forward plan making and Development Management functions, and the Minerals Industry, in planning their future investment decisions and informing planning application assessments.

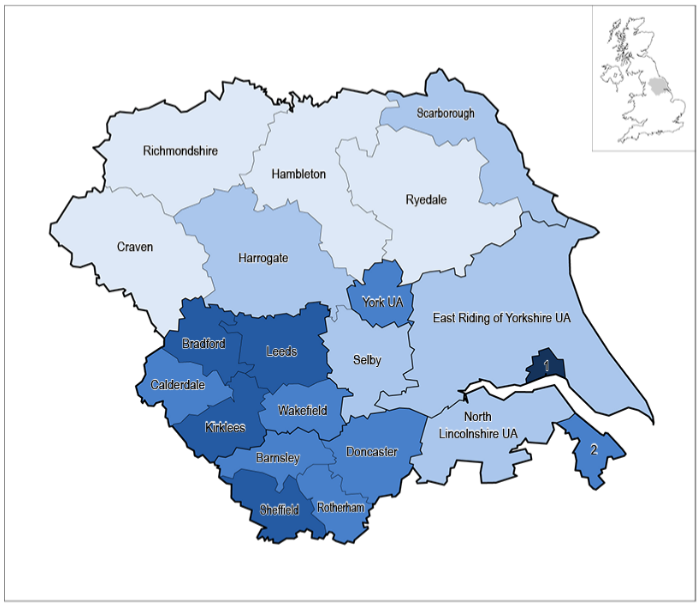
1.1.8. The Yorkshire and the Humber Aggregates Working Party (AWP), an advisory body made up of MPAs across the region, the aggregates industry and other relevant expert organisations, has a role in monitoring the operation of the LAA system through providing technical advice. A draft version of the West Yorkshire Local Aggregates Assessment 2018 will be submitted to the AWP for consideration and scrutiny. Following stakeholder consultation and the implementation of any necessary amendments, the LAA will subsequently be presented to the West Yorkshire Combined Authority/ Leeds City Region Portfolio Holders Board for formal ratification.

1.2. Geographical Context

1.2.1. West Yorkshire is located in the north of England in the Yorkshire and Humber Region. West Yorkshire is heavily urbanised accommodating 2.3 million people (42% of the 5.5 million population of the Region) within 13% of the Region's total land area. Figure 1 below is a population density map produced by the Office of National Statistics which illustrates the high population density in West Yorkshire relative to other parts of the Region.

FIG1

Yorkshire and The Humber population density: by local or unitary authority, 2010



Population density, 2010 (people per sq km)

- 2,500 or over
- 1,000 - 2,499
- 500 - 999
- 250 - 499
- 100 - 249
- 99 or under

1 Kingston upon Hull, City of UA
2 North East Lincolnshire UA

1.2.2. South Yorkshire has many geographical similarities with West Yorkshire; however North and East Yorkshire contain much lower levels of urban development, but with consequently increased accessibility of mineral resources. In terms of administrative areas the Yorkshire and Humber Area is largely covered by Unitary Planning Authorities, each solely responsible for Minerals Planning within their administrative areas, with the exception of the administrative area covered by North Yorkshire County Council.

1.2.3. The Office of National Statistics estimates that in mid-2017 West Yorkshire had a population of 2,307,000 million people and that by 2037 West Yorkshire's population will have increased by approximately 200,000 to 2,462,000, an increase of 7%[1]. Please note that this estimated population increase is based upon 2016 data and has been revised down by 3% from

[1] ONS, May 2018, 2016-based Subnational Population Projections for Local Authorities in England: Table 2

the previous estimate set out in the 2017 LAA, which was based upon 2014 data.

1.2.4. This population and household growth, will, in turn, create the need for new homes, employment opportunities and improvements in transportation and other infrastructure. It is crucial that the West Yorkshire authorities are able to identify a sufficiency of minerals supply to successfully accommodate these growth projections.

1.2.5. Given its mineral resource limitations and heavily urbanised nature West Yorkshire is not able to independently meet the high aggregate consumption requirements of the modern construction industry, particularly in terms of concreting aggregate and roadstone. Therefore minerals flows into West Yorkshire are considered to be of greater significance than indigenous production in terms of safeguarding adequate and steady supplies of the aggregates consumed by the West Yorkshire economy.

1.3. Transportation of Aggregates (General)

1.3.1. The M62 motorway and trans-Pennine railway line provide east west transportation links between West Yorkshire, East Yorkshire and Manchester/ Liverpool. The M1/ A1(M) and the east coast mainline provide north-south links between West Yorkshire and York, Newcastle and the wider North-West Region to the north and Sheffield, Derbyshire, Nottinghamshire, London and the South-East to the south. The Settle Carlisle railway also provides rail-freight connectivity to North Yorkshire and the Yorkshire Dales.

1.3.2. Commercial canal/ waterway connectivity and associated wharf infrastructure still remains in place to the east of Leeds, allowing potential waterway commerce connections between West Yorkshire and the Humber Docks via Goole. Although the Leeds-Liverpool canal remains well used for leisure traffic the infrastructure is not currently in place to allow similar commercial waterway goods transportation between West Yorkshire and Manchester/ Liverpool to the west.

1.3.3. The vast majority of aggregate is distributed within or arrives in West Yorkshire by road based heavy goods vehicles. Issues associated with the transportation of minerals by road are frequently one of the main causes for community concern in relation to minerals development. Locally, quarry vehicles can be the predominant goods vehicle on the road network at certain times of day, or can significantly add to road congestion and issues associated with poor air quality.

1.3.4. The West Yorkshire Low Emissions Strategy 2016 to 2021 (LES) confirms that ‘in some parts of West Yorkshire … road traffic is having a significant impact on air quality’ and that ‘the number of HGVs on the West Yorkshire road network contribute significantly to local and regional air pollution’. The West Yorkshire Transport Strategy 2040 Transport Plan further advises that:

- 61million tonnes of freight arrive into West Yorkshire annually;
- 54 million tonnes are exported (2010);
- 93% of goods are transported by road, only 7% by rail;
- Heavy goods vehicles account for only 5% of vehicles on our roads but 30-45% of air pollution from road transport in UK urban areas.

1.3.5. Considering the 2014 BGS estimate that 1,997,000 tonnes of aggregates were imported into West Yorkshire in 2014, as set out in table TAB11 of this report, with the majority being by road transport, and given the acknowledged disproportionate contribution which road freight transportation makes to air pollution, it is clear that reducing aggregate road freight movements, by attempting to shift an increasing proportion of aggregate freight transportation onto rail and waterways and off roads, would be likely to make a significant contribution towards tackling air quality problems in West Yorkshire in accordance with the West Yorkshire Low Emissions Strategy.

1.4. Transportation of Aggregates (Barge)

1.4.1. Distribution of aggregates into and within West Yorkshire by barge does not currently take place to any significant degree. However the potential for movement of aggregate by water remains, with two operational wharves remaining in Leeds at Fleet Lane and Knostrop. Additionally an application for the development of a further new aggregate wharf at Haigh Park Road, Stourton, was approved by Leeds City Council on 02 April 2015. This new wharf is expected to distribute approximately 2,000 tonnes per week of aggregate (sand and gravel) arriving from the Humber Ports.

1.4.2. Outside of Leeds barge transportation infrastructure is more limited, following the 2013 closure of the Lafarge wharf at Whitwood (Wakefield) in 2013. This wharf previously imported sand and gravel by barge from the Trent. Lafarge indicated that the closure was due to their merger with Tarmac, which gave them access to more local quarries to supply their concrete works.

1.4.3. As discussed more extensively in Section 4.4 of this report, there have been recent positive moves forward in terms of the delivery of enhanced canal freight infrastructure to provide a marine transportation route between Leeds and the Humber. This progress relates to the Canal & River Trust's 'Inland Waterway Transport Solutions' (IWTS) project which aims to remove bottlenecks in terms of lock capacities, etc, and to consequently increase the size of ship that can access Leeds and the amount of freight that can be carried by this mode of transportation (including aggregate).

1.4.4. The Canal and River Trust have indicated that the scope of works which would be required to 'create a new coherent, feasible, more viable and more resilient transport option between the northern cities, the Humber and Europe' would include:

- Construction of new wharves;
- Minor channel dredging;
- Enhancements to Bulholme and Castleford Lock, and;
- Improvements to air draft at a number of key bridges[2].

1.4.5. Transportation of aggregate by barge on inland waterways has an obvious significant potential to improve the sustainability of the West Yorkshire aggregate distribution system, particularly in terms of marine aggregate distribution connectivity between Leeds and the Humber docs. However it is fair to say that plans for more extensive commercial aggregate transportation by inland waterway have not yet matured to fruition and it may take a number of years before transportation by barge is a viable option for aggregates.

1.4.6. Therefore, at this stage, the focus for Local Authorities should be to flag the potential importance of this mode of aggregate transportation within relevant plans and strategies and to safeguard land and infrastructure which could be required to facilitate the enhancement of the inland waterway network and its landing and loading facilities. Close engagement with the Canal and River Trust will be important in this regard.

1.5. Transportation of Aggregates (Rail)

1.5.1. Crushed rock limestone is transported by train from Buxton to Stourton (Leeds) and from Dry Rigg, Acrow, Ingleton and Swinden Quarries to Cross Green (Leeds). The two aggregate offloading facilities at Cross Green are operated by Tarmac and Hanson the Stourton facility is operated by Cemex. It is also understood that some aggregate and cement is brought by rail to the Construction Materials plant at Bretton Street in Dewsbury. All these terminals also distribute aggregate by road to other local sites.

1.5.2. Leeds City council have confirmed that the Cemex aggregate rail depot in Leeds is likely to be lost due to the impact of HS2 and that the development of additional rail aggregate offloading infrastructure in Leeds will be required to compensate for this capacity reduction. Although a site has been allocated to provide additional rail offloading capacity in Leeds, evidence indicates that there will remain a shortfall in aggregate rail offloading capacity to serve West Yorkshire.

1.5.3. The adopted Yorkshire Dales National Park Local Plan seeks a 50% (minimum) reduction in road traffic from quarries in the National Park. If West Yorkshire is to continue to rely extensively on aggregate extracted from quarries in the Yorkshire Dales National Park it is therefore essential,

[2] ICE – NATIONAL NEEDS ASSESSMENT, RESPONSE BY THE CANAL & RIVER TRUST, 04 March 2016

that the existing rail depots are retained and potential new sites are safeguarded. This important matter is discussed in more detail in Section 4.5 of this report.

1.6. Transportation of Aggregates (Infrastructure Safeguarding)

1.6.1. In recognition of the importance of maintaining existing minerals rail and waterway transportation infrastructure and promoting any further opportunities to move minerals off public roads, Leeds' Natural Resources and Waste Local Plan includes policies which safeguard existing and potential rail sidings and several existing and potential wharf sites. However challenges have been experienced in relation to the implementation of this policy due to competing pressures for housing development.

1.6.2. This challenge has arisen because the Leeds policy allows for safeguarded sites to be used for alternate development if it can be demonstrated that the site is unlikely to be used for freight purposes. This issue of safeguarded rail and waterway transportation infrastructure being threatened by alternative development proposals may be exacerbated by the new national planning policy guidance set out in section 11 of the revised NPPF. This revised guidance puts a strong emphasis upon the benefits of building upon previously developed and under-utilised land and advises that, where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan, applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area.

1.6.3. Within Bradford's adopted Local Plan Core Strategy Policy TR6: Freight sets a commitment to:

> *Encourage the protection of rail connected land for future uses that require rail freight use and seek to encourage the development of intermodal interchanges and improvements to multi-modal transfer facilitie*s.

1.6.4. The Calderdale Local Plan Publication Draft confirms that, given the geography and current physical infrastructure of Calderdale, alongside the nature of the local quarrying industry, it is not intended to safeguard the transport element of the minerals supply chain. However a general minerals infrastructure safeguarding policy for Calderdale is proposed through draft policy MS3.

1.6.5. The Wakefield Local Development Framework Core Strategy policy CS9 includes a general policy for the safeguarding of rail and waterway infrastructure through policy CS9 which states that: *Sites which are used or suitable for inter-modal transfer facilities, rail freight facilities and the loading and unloading of water-borne freight will be protected for these uses and water and rail freight connections to existing industrial sites will be retained wherever possible and the development of new inter-modal transfer facilities, new rail sidings and rail freight facilities and new wharves will be encouraged*.

1.6.6. The Kirklees Submission Draft Local Plan proposes to safeguard several specific minerals transportation facilities through proposed policy PLP 39 including: a former coal and aggregates depot and a cement depot with rail

spurs in Dewsbury and a former Coal Wharf on the Calder & Hebble Navigation.

1.7. National Parks and Areas of Natural Beauty

1.7.1. The NPPF indicates that when determining planning applications, local planning authorities should, as far as is practical, provide for the maintenance of landbanks of non-energy minerals from outside National Parks. The West Yorkshire sub-region does not include a significant amount of national park land, other than a slight overlap of the Peak District National Park into the far southern periphery of Kirklees. However this small area of National Park within West Yorkshire contains no active minerals extraction sites.

1.7.2. Nonetheless it is known that West Yorkshire does receive significant quantities of crushed rock aggregate from quarries within the Yorkshire Dales National Park (YDNP), including high specification aggregates, and also receives aggregate quarried within the Nidderdale Area of Natural Beauty (AONB). Recently published British Geological Survey data indicates that, of the 2.5 million tonnes of crushed rock estimated to have been consumed within West Yorkshire in 2014, in the region of 900,000 tonnes (35%) was sourced from quarries within the Yorkshire Dales National Park (see section 4.1 below).

1.7.3. No apportionment has been set within the North Yorkshire LAA to continue this supply of crushed rock aggregates from the Yorkshire Dales into the future. Moreover the adopted Yorkshire Dales National Park Local Plan proposes to restrict the development of new crushed rock quarries or the extension of existing quarries into areas of undisturbed land other than in exceptional circumstances. However very significant reserves exist in the YDNP capable of continuing to supply markets at existing rates for many years. Reserves could also potentially be increased further, subject to the outcome of an application by Tarmac to deepen Swinden Quarry (which would add approximately 11 million tonnes to the existing 30 million tonne reserve of carboniferous limestone).

1.7.4. Lesser, but still significant quantities of crushed rock aggregates are transported into West Yorkshire from limestone and gritstone quarries within the Peak District National Park. The Peak District Local Plan Core Strategy imposes a still tougher planning policy framework for new and extended minerals workings. Policy MIN1 confirms that proposals for new mineral extraction or extensions to existing mineral operations (other than fluorspar proposals and local small-scale building and roofing stone) will not be permitted other than in exceptional circumstances. The most recent Local Aggregates Assessment covering the Peak District (2016) confirms that a number of Peak District quarries have closed within recent years.

1.7.5. In the longer term alternative resources may therefore be required to supplant the significant quantities of aggregates supplied into West Yorkshire from quarries located in Yorkshire Dales National Park. Although an application has been submitted to significantly increase reserves at

Swinden Quarry, this site does not produce high specification aggregates and the proposed void deepening would only extend the lifetime of the quarry by 9 years.

1.7.6. Consequently, if new resources are not identified, there is a risk that supplies of aggregates into West Yorkshire, and in particular high specification aggregates, may not be maintained at satisfactory levels in the mid to long term, as existing National Park permitted reserves are exhausted. The high specification sandstone aggregate produced within the Yorkshire Dales National Park is of a quality which cannot be produced within West Yorkshire or any other existing established significant sources of supply into the West Yorkshire market. This issue is discussed further in Section 1.9 below.

1.8. West Yorkshire Local Plans

1.8.1. Having a robust Local Aggregate Assessment in place is a pre-requisite to arriving at sound minerals planning policies and to enable the delivery of policies to be accurately monitored and updated. The LAA should be one of the key pieces of evidence underlying policies relevant to the supply and safeguarding of minerals within Local Plans. All five West Yorkshire Local Authorities are independently responsible for minerals planning within their respective administrative areas but have agreed to jointly produce a Local Aggregates Assessment to inform their plans.

1.8.2. The five West Yorkshire authorities are at different stages of plan making with Leeds, Wakefield and Bradford having some up-to-date Local Plan documents relevant to minerals planning in place. However all three of these adopted plans are now under review, partly to allow for policies and proposed land allocations to be adjusted to reflect the implications of the new household growth forecasts and new methodology for calculating housing need. Of the two authorities who have not published up-to-date Local Plans, Kirklees are now in the final stages of plan preparation, with an inspector having found their proposed Local Plan sound, subject to modification, and Calderdale have now produced a Publication Draft Local Plan prior to submission to the Secretary of State for examination.

1.8.3. The effect of the (generally downward) revisions to household growth forecasts for West Yorkshire, coupled with the changes to government guidance on the correct methodology to be adopted to by planning authorities in order to calculate housing need, means that the new and updated Local Plans which are being prepared by West Yorkshire Local Authorities are generally likely to plan for the delivery of a lower number of new homes than is the case for current adopted plans. However please note that this statement is a generalisation for West Yorkshire authorities overall and that there is significant variation between authorities in terms of changes to housing delivery targets.

1.8.4. Previous versions of the WYLAA have adopted the approach of planning for increases in future aggregate provision in-line with planned increases in

housing delivery. This approach is considered to remain valid. However the generally lower housing delivery targets which are likely to be included within updated and new Local Plans, together with the improving trend in actual housing delivery in West Yorkshire, means that the gap between actual and planned housing delivery is likely to be reduced and consequently the level of uplift to be applied to the 10 year aggregate sales average is likely to be lower. As discussed in Section 4.6 of this report this has resulted in a reduction in the uplift factor to be applied to the WYLAA 2018 landbank to 27.5%, from a figure of 35% applied to the WYLAA 2017 landbank.

1.8.5. In terms of the minerals planning content of West Yorkshire Local Plans, the minerals related policies of the Leeds Local Plan are set out in their Core Strategy and Natural Resources and Waste Local Plan. The minerals planning framework set out in these documents includes a number of minerals site allocations for proposed new extraction areas and the safeguarding of existing resources and infrastructure and also includes criteria based policies for assessing applications for new minerals sites and non-minerals development on safeguarded minerals resources.

1.8.6. Through Policy MINERALS 5, the Leeds Natural Resources and Waste Local Plan, adopted on 16th January 2013, allocates an extensive Area of Search for Sand & Gravel in the area south of Leeds, around Methley, and also allocates land at Midgley Farm in Otley for Sand & Gravel extraction. This is upon the basis that previous relatively recent commercial extraction activity and minerals industry enquiries indicate that that there are likely to be economically viable sand and gravel resources remaining within this area. Furthermore the landscape in this area is not considered to be so sensitivity that the principle of further extraction would be precluded.

1.8.7. However, unfortunately, despite the positive minerals planning policy environment for sand and gravel extraction within these areas set out within the Leeds Local Plan, the previous commercial interest in further undertaking further sand and gravel extraction has not been progressed to fruition. Considering the general concern regarding the availability of land won sand and gravel resources within the Region the lack of interest in further sand and gravel extraction in the allocated areas around Otley and Methley is surprising. Further discussion with minerals industry representatives in relation to this issue may be beneficial to enable a better understanding of the factors which have impeded progress.

1.8.8. The Leeds Natural Resources and Waste Local Plan takes a different approach to the extraction of sand and gravel in the Wharfe Valley in the area east of Pool, given the area's high landscape sensitivity. Consequently Policy MINERALS 6 states that it is unlikely the Council will support proposals for further sand and gravel extraction within this area. Therefore it is acknowledged that the sand and gravel resource mapped by the BGS within this area is unlikely to be released for extraction within the Leeds Local Plan period.

1.8.9. Leeds City Council are currently reviewing the contents of their adopted Development Plan and accordingly the Leeds Core Strategy Selective

Review was submitted to Full Council on 11 July 2018. The selective review will result in a series of focused amendments to the adopted Core Strategy. The scope of the Review was consulted on in 2017. Leeds Council proposes to review the following parts of the Core Strategy:

- Reviewing the housing requirement in Policy SP6 – what is proposed is a reduction in the amount of housing land to be allocated from land sufficient to accommodate 54,352 dwellings (gross) to land sufficient to accommodate 46,352 dwellings (gross);
- Reviewing the housing distribution in SP7, and extending the Plan period to 2033;
- Introducing new policy on housing standards with minimum space standards, and accessibility standards for new housing in policies H9 and H10;
- Updating policy and requirement on affordable housing by amending Policy H5;
- Reviewing the requirement for greenspace in new housing developments by amending Policy G4;
- City Centre Green Space, making minor amendments to Policies G5 and G6;
- Incorporating new national policy regarding Code for Sustainable Homes by updating the wording of Policies EN1 and EN2 and a consequential change to EN4;
- Introducing a new Policy for Electric Vehicle Charging Infrastructure (EN8).

1.8.10. Wakefield, who adopted their Local Plan/ Local Development Framework in 2009, are now in the initial stages of producing a replacement *Wakefield Local Development Plan 2036*. The adopted Local Plan is in the Local Development Framework format with a series of Development Plan Documents informed by a Core Strategy. The Wakefield Core Strategy sets out a commitment to maintaining an appropriate contribution towards the regional supply of aggregates and safeguards mineral resources including the Magnesian Limestone resource in the Knottingley and Darrington area and existing permitted reserves throughout the District. The Site Specific Policies DPD provides for the safeguarding of further minerals deposits, including clay resources in Normanton and Sand & Gravel Resources in Horbury and Stanley Ferry, as well as parts of the coalfield.

1.8.11. An early engagement consultation for the proposed new replacement Wakefield Local Plan was published in October 2017. The Wakefield Local Development Plan early engagement consultation paper notes that household projections show a significant slowing of growth. However the consultation paper confirms that there remains the need to develop significant numbers of new homes and places of employment within the Wakefield District in the period up to 2036. The consultation paper focusses on gauging public opinion on 3 potential alternative strategies for focusing housing and economic growth in the period up to 2036, namely:

A) Growth Across Wakefield District,
B) Regeneration Focused Growth, or
C) Connectivity and Regeneration Focused Growth.

1.8.12. Bradford Council's Local Plan Core Strategy, which includes minerals policies, was formally adopted by the Council in July 2017. The Core Strategy includes criteria based policies for assessing new minerals planning applications and defining a minerals area of search. The policy environment depicted is broadly supportive of building stone quarrying and sand & gravel extraction, subject to specified environmental criteria being met. The quarrying of primary aggregates is only generally undertaken in Bradford as a by-product of building stone quarrying and the Bradford Core Strategy is also broadly supportive of the continuation of aggregate production at building stone quarries, particularly where building sand would be produced.

1.8.13. The Bradford Core Strategy also includes a minerals safeguarding policy, identifying the broad extent of the Sandstone, Sand & Gravel and Coal resources which are to be safeguarded from non-minerals surface development. However, the Bradford Core Strategy recognises the constraint on development which would result from an all-encompassing approach to minerals safeguarding, given the extent of the minerals safeguarding areas, particularly in relation to sandstone and the urban coalfield. Consequently the Bradford minerals safeguarding policy includes a range of exceptions and focuses on facilitating prior extraction of minerals, rather than constraining development.

1.8.14. Bradford Council are also reviewing the provisions of the Core Strategy, in the context of the down-graded growth projections and are in the early stages of producing an Allocations DPD, which will complete the Local Plan. In July 2018 a revised timetable for the completion of Bradford's Local Plan went to the Council's Executive. The timetable essentially allows for a delay to the publication of the Allocations DPD, whilst the Core Strategy partial review is undertaken, with revised housing delivery targets for the plan period likely to be set.

1.8.15. Kirklees have submitted their Local Plan for examination. The examination hearings commenced on Tuesday 10 October 2017 and concluded in April 2018. The inspector has provided a post hearings letter to the council following the closure of the hearings. This letter confirms that the Local Plan is capable of being found legally compliant and sound subject to main modifications. Kirklees Council have responded to the inspector's letter confirming that it is content to proceed on the basis of the agreed main modifications. Kirklees Council are now preparing these modifications and arrangements will be made for consultation on them in summer 2018.

1.8.16. The draft Kirklees Local Plan sets out a policy framework for assessing applications for new minerals development based upon a range of criteria relating to the protection of people and the environmental. The policy framework is generally supportive of local building stone quarrying and also commits to contributing towards the maintenance of adequate landbanks of aggregates in West Yorkshire. The Local Plan also provides for safeguarding of minerals and infrastructure and includes a significant number of minerals site allocations, including areas of search, preferred areas and specific extraction and infrastructure sites.

1.8.17. Calderdale Council have also now published a draft version of their proposed Calderdale Local Plan (June 2018). The draft Calderdale Local Plan provides for the allocation of all existing quarries for continued minerals extraction and also proposes the allocation of 2 extensions to a sandstone quarry in Southowram and the safeguarding of a concrete batching plant. The Local Plan also includes a suite of criteria based minerals policies based around the following stated strategy:

- *The Council along with other Mineral Planning Authorities within West Yorkshire will seek to make an appropriate contribution towards the maintenance of a ten year land bank for crushed rock aggregates as identified through the West Yorkshire Local Aggregate Assessment (LAA);*
- *Extensions to existing mineral workings will be preferred to the opening of new workings, whilst acknowledging that minerals can only be worked where they are found;*
- *The Council will encourage the processing of secondary and recycled aggregates in order to reduce reliance on primary extraction;*
- *The Borough will identify and safeguard known mineral resources of local and national importance to ensure they are not needlessly sterilised by non mineral development;*
- *Proposals for extracting other types of minerals and proposals for the production of recycled and secondary aggregates will be assessed in accordance with national policy and the environmental criteria set out in Policy MS4;*
- *In view of the national importance of the local sandstone resource the Council will seek to encourage producers to maintain reserves at a level of 10 years projected sales;*
- *Applications to reopen disused stone quarries in order to repair historic buildings will be supported where the proposal is in accordance with other Mineral Policies and where it can be shown that such materials cannot be supplied from an existing quarry.*

1.9. Other Relevant Local Aggregate Assessments

1.9.1. West Yorkshire has historically been, and remains, reliant on aggregates imported from adjoining areas to fulfil its construction needs and therefore security of the supply patterns which fulfil West Yorkshire demand is a key issue relevant to the West Yorkshire LAA. This section will therefore summarise the findings of the LAAs produced by Mineral Planning Authorities supplying aggregate into West Yorkshire, as shown in Figure 9.

1.9.2. The two most significant LAAs, in terms of the minerals supplied into West Yorkshire, are the LAA relating to the North Yorkshire Sub-region (including the Yorkshire Dales National Park) and the LAA relevant to minerals producing authorities within the South Yorkshire area (the Doncaster and Rotherham LAA). However also of relevance are the LAAs of Derbyshire, Derby and the Peak District and the Humber Area.

North Yorkshire LAA

1.9.3. The Local Aggregate Assessment for the North Yorkshire Sub-region (NYLAA) covers the administrative areas of North Yorkshire County Council, City of York Council, and the Yorkshire Dales and North York Moors National Park Authorities. First published in January 2013 it has subsequently been regularly updated, with a fourth review document having recently been consulted upon.

1.9.4. The area covered by the NYLAA has historically been a significant supplier of land won aggregates to surrounding urban areas, including the Leeds City Region. The main types of aggregate produced within the NYLAA Area are crushed limestone (Carboniferous, Magnesian and Jurassic), crushed sandstone (Ordovician and Silurian - including High Specification Aggregates (HSA)/ High Polished Stone Value (PSV) aggregate) and sand and gravel (including significant quantities of concreting grade material).

1.9.5. All of the sand and gravel produced within the NYLAA Area is derived from the administrative area of North Yorkshire County Council, outside of the National Parks. However over half of the crushed rock aggregate (52% of the 6.7 million tonne total annual production in 2017) is derived from the Yorkshire Dales National Park (YDNP). No aggregate is currently sourced from the North York Moors National Park. The crushed rock aggregate produced from quarries within the YDNP includes all of the HSA/ High PSV Material which is produced within the NYLAA Area.

1.9.6. This HSA/ High PSV aggregate is produced from a specific type of sandstone resource which is not available to be quarried elsewhere within the NYLAA and is only available from a limited number of sources nationally. The HSA/ High PSV aggregate is primarily used for the manufacture of skid resistant road surfacing asphalt.

1.9.7. Recently released BGS data associated with the national aggregate monitoring survey 2014 indicates that between 0.8 and 1 million tonnes of the 3.2 million tonnes of aggregate extracted within YDNP in 2014 was consumed within West Yorkshire, i.e. between 25% and 30% of YDNP's total aggregate production was exported to West Yorkshire. Tables 12 and 14 of the 4th review document confirm that the most important supply market for both crushed rock and sand and gravel supplies extracted within the North Yorkshire LAA is West Yorkshire.

1.9.8. The data included within the draft 4th review document confirms that overall aggregate reserves for the North Yorkshire Area have declined by 29% between 2006 and 2017 and that the most significant decline has been in reserves within the Yorkshire Dales National Park (which have declined by 36% over this period). The NYLAA does not suggest any figures for future aggregate provision from within the YDNP, due to the particular policies which apply to minerals extraction within National Parks.

1.9.9. The Yorkshire Dales National Park Local Plan (adopted December 2016) applies the national planning policy position in relation to the extraction of minerals in National Parks by restricting the development of new crushed rock quarries or the extension of existing quarries into areas of undisturbed

land other than in exceptional circumstances. However the continuity of supplies from existing extraction sites is provided for by allowing extensions, in time, extraction area or depth, in disturbed land within the boundary of an existing active quarry, where specified criteria are met.

1.9.10. One such proposal was submitted by Tarmac in January 2017 for the deepening of Swinden Quarry by approximately 50 metres, to allow the release of a further 11 million tonnes in addition to the existing 30 million tonne reserve of carboniferous limestone. However this application has not yet been determined. It should also be noted that this site quarries carboniferous limestone, which is primarily used as a concreting aggregate. Therefore the outcome of the application would not improve the security of supplies of the HAS/ High PSV sandstone resource which is also quarried within the Yorkshire Dales National Park.

1.9.11. Additionally it should be noted that Swinden Quarry does not just supply aggregates to the West Yorkshire market. An increasing proportion of reserves are transported from the site by rail, as required by the Yorkshire Dales National Park Local Plan, which increases the potential to distribute quarried aggregates to more distant aggregate consumption markets. Concerns about the availability of sufficient aggregate rail off-loading facilities in West Yorkshire, as discussed further in Section 4.5 of this report, could potentially affect the extent to which these further reserves are off-loaded in West Yorkshire and feed West Yorkshire construction aggregate demand.

1.9.12. In relation to the future availability of HSA/ High PSV aggregates, the draft NYLAA 4th Review assess that that 'although potential future resources of high PSV material are limited by geological conditions at the three existing quarries, it is expected that planning applications will be submitted for additional reserves and/or extended lives'. The draft 4th review document highlights the approval of an application to deepen Arcow Quarry in July 2017 and the recommencement of working of high PSV stone at Horton Quarry in 2017 as examples where opportunities have been taken to enhance supplies of High PSV from existing sites.

1.9.13. Nonetheless the draft NYLAA 4th review acknowledges that there is 'potential for reserves of high PSV aggregate in the Yorkshire Dales National Park to be significantly reduced in the mid-term'. The North Yorkshire sub-region outside the YDNP is not in a position to make up any longer term shortfall in HSA, as suitable resources do not exist. Mid-term threats to the future supply of magnesian limestone from the NYCC area are also highlighted in the LAA, as are 'constraints on supply of sand and gravel … potentially impacting on security of supply to the North Yorkshire internal market, the West and South Yorkshire areas and into the North East Region'.

1.9.14. In terms the landbanks presented within the NYLAA, the draft 4th review document puts the 2017 landbanks at 7.1 years for sand and gravel, 22.3 years for crushed rock (outside of YDNP) and 26.3 years for crushed rock within the YDNP. In the case of the aggregates quarried outside of the

YDNP, the future annual aggregate provision quantities upon which these landbanks are based are not solely based upon 10 year sales averages.

1.9.15. Instead the methodology employed adjusts the sales average up based upon estimates of the increase in sand, gravel and crushed rock production which would be required to supply the raw materials necessary to deliver planned housing growth in the market area supplied by North Yorkshire. This approach is also intended to address the negative impact of the economic downturn on the 10 year sales average.

1.9.16. Consequently the NYLAA draft fourth review document suggests 'future provision for sand and gravel at an overall annual rate equivalent to 2.44mt and for crushed rock at an annual rate of 3.75mt for the period 2018 to 2030 for the North Yorkshire County Council, City of York Council and North York Moors National Park Authority minerals plan area.' This compares to 10 year sales averages of 1.7 million tonnes for sand and gravel and 3.0 million tonnes for crushed rock for the NYLAA Area outside of the YDNP. The adjusted figures are 44% and 25% higher than the historic sales averages respectively. However it notable that no future provision rate for crushed rock from the YDNP is proposed.

Doncaster and Rotherham LAA

1.9.17. An updated draft Local Aggregate Assessment (2018) has been produced for Doncaster and Rotherham (D&RLAA 2018). According to BGS figures, Doncaster was the second largest supplier of crushed rock into West Yorkshire in 2014. The draft DRLAA 2018 proposes apportionments based on a continuation of historic sales figures. Aggregate production within the Doncaster and Rotherham area relates to crushed rock (Magnesian Limestone) and also sand and gravel.

1.9.18. In relation to crushed rock the LAA advises that the landbank currently stands at 30.2 years. The LAA confirms that between 70 to 90% of the material produced in Doncaster stays within South Yorkshire and West Yorkshire, with 20% to 30% of West Yorkshire's crushed rock aggregate consumption being sourced from Doncaster. The draft D&RLAA 2018 does not flag up any concerns regarding the supply of crushed rock in the short, medium or long term. The document further advises that the Magnesian Limestone Crushed rock landbank is likely to be sustained beyond the proposed plan periods without the need for new permissions.

1.9.19. In relation to sand and gravel, based on ten year average sales of 310,000 tonnes, the landbank calculated in the draft DRLAA2018 stands at 18.1 years for 2017, which is well above the 7 year minimum set in the NPPF. However the draft LAA advises that historic returns and the Y&HAWP annual monitoring reports confirm that only a small proportion of the remaining permitted reserve in Doncaster is sharp sand suitable for use as concreting aggregate.

1.9.20. On sand and gravel, the draft DRLAA2018 concludes that:

'The 2017 monitoring identifies the sand and gravel landbank may well be sustained beyond the proposed 17 year plan period for Doncaster and the 15 year plan period for Rotherham. However, without new

permissions, the reserve toward the end of the plan period may fall below 7 years. To meet development demand in the short to medium term sand, gravel and crushed rock (if needed) will continue to be imported from the Idle Valley (Nottinghamshire), East Riding and Lincolnshire, North Yorkshire and Derbyshire. The availability of sharp sand and gravel still remains an issue, locally and regionally, with marine resources being considered as an option for consideration.'

1.9.21. The draft D&RLAA 2018 identifies that previous monitoring indicated that over half of the crushed rock sales within Doncaster are now for concreting aggregate. Therefore, whilst any flows of concreting sand and gravel from South Yorkshire to West Yorkshire are unlikely to be sustained into the future, the substantial remaining limestone reserves may play a role in meeting West Yorkshire's future demands both for concreting and non-concrete construction purposes. This issue is explored further in the recent WYCA report on Magnesian Limestone, see Section 2.4 below.

Derbyshire, Derby and Peak District National Park LAA

1.9.22. The Derbyshire, Derby and Peak District National Park LAA 2017 (DD&PDLAA 2017) identifies an estimated reserve of rock for aggregate use within Derbyshire and the Peak District, at active and inactive sites (excluding dormant sites), of over 853 million tonnes. This reserve comprises 852 million tonnes of limestone and 1.75 million tonnes of sandstone/ gritstone. Approximately 75% of the total aggregate reserve is located within Derbyshire with the remaining 25% being within the Peak District National Park. The LAA identifies that this quantity of reserves would be sufficient for over 90 years provision based on current production figures.

1.9.23. In terms of supply levels the DD&PDLAA 2017 calculates a 10 year sales average of crushed rock aggregate for Derbyshire and the Peak District of 9.34 million tonnes. Following a recent upwards trajectory, quarry output in 2016 returned to pre-recession levels of over 12 million tonnes per annum; however the effect of the recession has still clearly depressed the 10 year sales average. 32% of the crushed rock aggregate produced within Derbyshire and the Peak District is used for concrete manufacture, with 14% used as roadstone.

1.9.24. The DD&PDLAA 2017 identifies that Derbyshire and the Peak district National Park are significant net exporters of aggregate grade crushed rock to other areas, amounting to an average of around 9 million tonnes each year. The LAA further advises that Derbyshire has significant resources of hard rock compared to many other areas in the country and the affirms that it will be important, therefore, to maintain this level of supply in order to sustain and stimulate national economic growth.

1.9.25. The LAA identifies that in 2014 27% of the crushed rock aggregate produced in Derbyshire and 32% of the crushed rock aggregate produced in the Peak District was consumed within Derbyshire and the Peak District, with the remained exported to supply the construction industries of other areas. The BGS data from 2014 set out in Table 14 of this report indicates that in 2014 approximately 140,000 tonnes of crushed rock aggregate

extracted from Derbyshire was consumed in West Yorkshire, i.e. 2% of total quarry output for Derbyshire and the Peak District in 2014.

1.9.26. The DD&PDLAA 2017 broadly sets a future supply figure for crushed rock aggregates based on historic average sales levels; however with an adjustment intended to gradually reduce the proportion of aggregates produced within the Peak District National Park (PDNP). The PDNP has a policy in its Core Strategy (Policy MIN1) which does not allow for further new quarries or extensions to existing quarries, in order to reduce progressively the amount and proportion of aggregate grade crushed rock that is quarried from within the Park in order to protect the nationally important landscape.

1.9.27. Consequently the DDPDLAA reduces the future crushed rock aggregate provision apportionment to the PDNP by 10%, relative to the 10 year sales average, with an equivalent increase in the apportionment for the remainder of Derbyshire outside of the national park. Whilst this policy is intended to provide for a gradual reduction in the proportion of Derbyshire's aggregate which is supplied from sources within the PDNP, it is not intended to reduce the overall quantity of aggregate supplied from Derbyshire.

1.9.28. In relation to sand and gravel, reserves are located within Derby and Derbyshire (not in the National Park). Total sand and gravel reserves at the end of 2016 are calculated as 12.53 million tonnes with a landbank of 12 years at the proposed provision figure of 1.04 million tonnes per annum. An upward trajectory in sand and gravel production appears to be evident over the last few years but with supply levels over the period between 2007 and 2016 only fluctuating within the range of 800,000 tonnes annual production to 1,290,000 tonnes annual production. The analysis provided by the DD&PDLAA 2017 indicates that there is likely to be very limited potential for this level of production to increase substantially.

1.9.29. The DD&PDLAA 2017 confirms that 54% of the sand and gravel produced within Derby and Derbyshire is used for concrete making. The LAA calculates the 12 year landbank for sand and gravel based upon the 10 year sales average. The LAA identifies the potential for demand for sand and gravel to increase, primarily associated with planned housing growth and infrastructure projects. However the LAA suggests that adopting a provision figure based upon the 10 year sales average provides a reasonable and realistic figure to meet this demand for sand and gravel. However, the LAA confirms that the figure will be reviewed on an annual basis to ensure that it takes account of any significant changes in sales and demand as well as any other new and emerging information, particularly relating to economic growth.

Humber Area LAA

1.9.30. The latest Humber Area Local Aggregate Assessment, published in July 2018, covers the East Riding of Yorkshire, Hull, North Lincolnshire and North-East Lincolnshire for the 2016 data reporting period. The LAA indicates that there has been some changes from 2015 to 2016, with the Sand & Gravel landbank increasing from 7.6 years to 8.37 years and the crushed rock landbank decreasing from 39.4 to 32.7 years.

1.9.31. The Humber LAA confirms that the Humber Area continues to be a net importer of aggregates. However it is noted that 2014 BGS data indicates that between 20% and 30% of the sand and gravel consumed within the West Yorkshire came from the Humber Area (East Yorkshire). This amounts to between 140,000 tonnes and 210,600 tonnes of aggregate and means that West Yorkshire appears to have received between 22% and 33% of the total amount of sand and gravel extracted within the Humber Area in 2014.

1.9.32. Additionally the Humber LAA notes that marine aggregates provide a potential source of aggregates to the Yorkshire & Humber Region, including West Yorkshire, and beyond. The Humber Area LAA 2018 states that 3 new dredging applications could potentially increase permitted extraction by 1.9 million tonnes and that current estimates suggest there are 27 Years of primary marine aggregate production permitted.

1.9.33. The LAA advises that a new Sand & Gravel facility at King George Dock in Hull appears to have opened up opportunities, with a connection to the rail network, which has the potential to improve distribution to the wider Yorkshire & Humber region. However it is unclear whether these opportunities have materialised and what the distribution pattern is of marine aggregates landed in the Humber area.

1.9.34. At paragraph 6.15 the Humber Area LAA 2018 recognises that there may be a need to increase exports to areas of demand like West Yorkshire. The LAA also specifically recognises cross boundary movements into West Yorkshire, noting that it is Sand & Gravel rather than crushed rock which West Yorkshire seeks and will continue to do so, from the Humber area. Specific reference is made to the need for concreting sand in the Leeds area.

Lancashire LAA

1.9.35. Lancashire County Council have recently published a draft Joint Lancashire Local Aggregate Assessment – April 2018. Although West Yorkshire is within relatively close proximity of Lancashire, there is no evidence that there are any significant aggregate flows between the two areas. However, given the national and local aspirations to limit mineral extraction in National Parks and the potential future constraints on sand and gravel extraction within North Yorkshire, there are likely to be future changes in minerals supply flows, including new supplies entering the West Yorkshire market.

1.9.36. Such changes could potentially lead to an increase in cross-boundary aggregate flows between Lancashire and West Yorkshire, particularly in terms of sand and gravel. Therefore the West Yorkshire Combined Authority have made representation in response to the consultation on the draft join Lancashire LAA 2018 asking that the LAA notes this issue and includes some recognition that potential future restrictions on existing sources of aggregate supply into the West Yorkshire market might mean that the forecast aggregate demand in future Lancashire LAAs needs to be revisited.

1.10. National & Regional Guidelines for Aggregate Provision

1.10.1. The Government has previously published guidelines for aggregate provision in England covering 16 year periods which are essentially intended to predict the amount of aggregate required to be produced over a given period to allow industrial needs to continue to be met, taking account of growth factors and also of targets for the use of recycled aggregate.

1.10.2. The most recent of these guidelines was published in June 2009 as, National and regional guidelines for aggregates provision in England 2005-2020. The guideline aggregate production figures for the English Regions of the 2005-2020 period are as set out in the table below:

TAB1 - National and regional guidelines for aggregates provision in England 2005-2020

New Regions	Guidelines for land-won production		Assumptions		
	Land–won Sand & Gravel	Land-won Crushed Rock	Marine Sand & Gravel	Alterna-tive Materials	Net Imports to England
South East England	195	25	121	130	31
London	18	0	72	95	12
East of England	236	8	14	117	7
East Midlands	174	500	0	110	0
West Midlands	165	82	0	100	23
South West	85	412	12	142	5
North West	52	154	15	117	55
Yorkshire & the Humber	78	212	5	133	3
North East	24	99	20	50	0
England	**1028**	**1492**	**259**	**993**	**136**

1.10.3. The national guidelines document indicates the above regional figures should be broken down further to sub-regional Mineral Planning Authority areas by regional planning bodies. However the regional planning body relevant to West Yorkshire, the Yorkshire and Humber Assembly, was dissolved in 2011 prior to an apportionment of the 2005-2020 guideline figures having been made.

1.10.4. The Regional Planning Body had used a simple methodology for sub-regionally apportioning the predecessors to the 2005-2020 aggregate guideline figures, based upon average sales figures for aggregates from each sub-region over the period 1997-2001, adjusted to provide for the level of output necessary to meet the regional apportionment. This apportionment method resulted in West Yorkshire being apportioned to supply 0.34 million tonnes of sand and gravel per year (7.5% of the Regional total) and 1.1 million tonnes of crushed rock aggregate per year (8% of the Regional total).

1.10.5. The Regional Planning Body delayed their sub-regional apportionment of the 2005-2020 guideline figures, pending a review of whether the apportionment methodology could be adjusted to provide for a more sustainable spatial distribution of aggregate extraction sites (increasing the apportionments to West and South Yorkshire). To this end a series of three reports were published between 2004 and 2009; however the Yorkshire and Humber Assembly was dissolved before the review process could be completed and an apportionment methodology for the 2005-2020 guideline figures was never agreed.

1.10.6. Therefore, instead of calculating landbanks based upon an apportionment of the national and regional guideline figure, the Yorkshire and Humber Region Aggregates Working Party Annual Monitoring Report for 2009, published in 2011, opted to calculate aggregate landbanks based upon 7 year average sales figures. Due to the low level of output from West Yorkshire, average 7 year sales figures for sand and gravel from the sub-region could not be disclosed for commercial confidentiality reasons, therefore no separate landbank for West Yorkshire sand and gravel was included in the 2009 annual monitoring report.

1.10.7. Subsequent Annual Monitoring Reports for the Region have not sought to provide any sub-regional apportionment of the Regional guideline figures and, given their age, the standing and status of these figures is now questionable. Although no formal sub-regional apportionment of the 2005-2020 guideline figures has been undertaken, it is worth noting that regional sand and gravel supply apportionment was increased by 7% from the 2001-2016 apportionment. Whereas the 2005-2020 crushed rock apportionment figure for the Yorkshire and Humber Region represents a reduction in 4% from the 2001-2016 figure.

1.10.8. It should also be noted that, if the same apportionment methodology had been applied to the 2005-2020 figures as had been previously used for the 2001-2016 figures, based upon historic 7 year average sales figures, the West Yorkshire apportionment for crushed rock would have been 1.22 million tonnes and the combined sand and gravel apportionment for West and South Yorkshire would have been 0.58 million tonnes. Table 2 below summarises the figures discussed above:

TAB2 – Theoretical West Yorkshire Apportionment of 2005-2020 Yorkshire & Humber Aggregate Guideline Figures, Based Upon 2010-2016 Annual Sales Averages

Note: All figures in millions of tonnes	Sub-regional Apportionment of 2001-2016 Regional Figure	Average Sales (2010 – 2016)	Proportion of Yorkshire and Humber Sales	Sub-regional Apportionment of 2005-2020 Figure (based on 2008-2014 sales avg)
Sand and Gravel (W & S Yorks)	1.16	0.33	12%	0.58
Crushed Rock (W Yorks Only)	1.11	0.81	9%	1.22

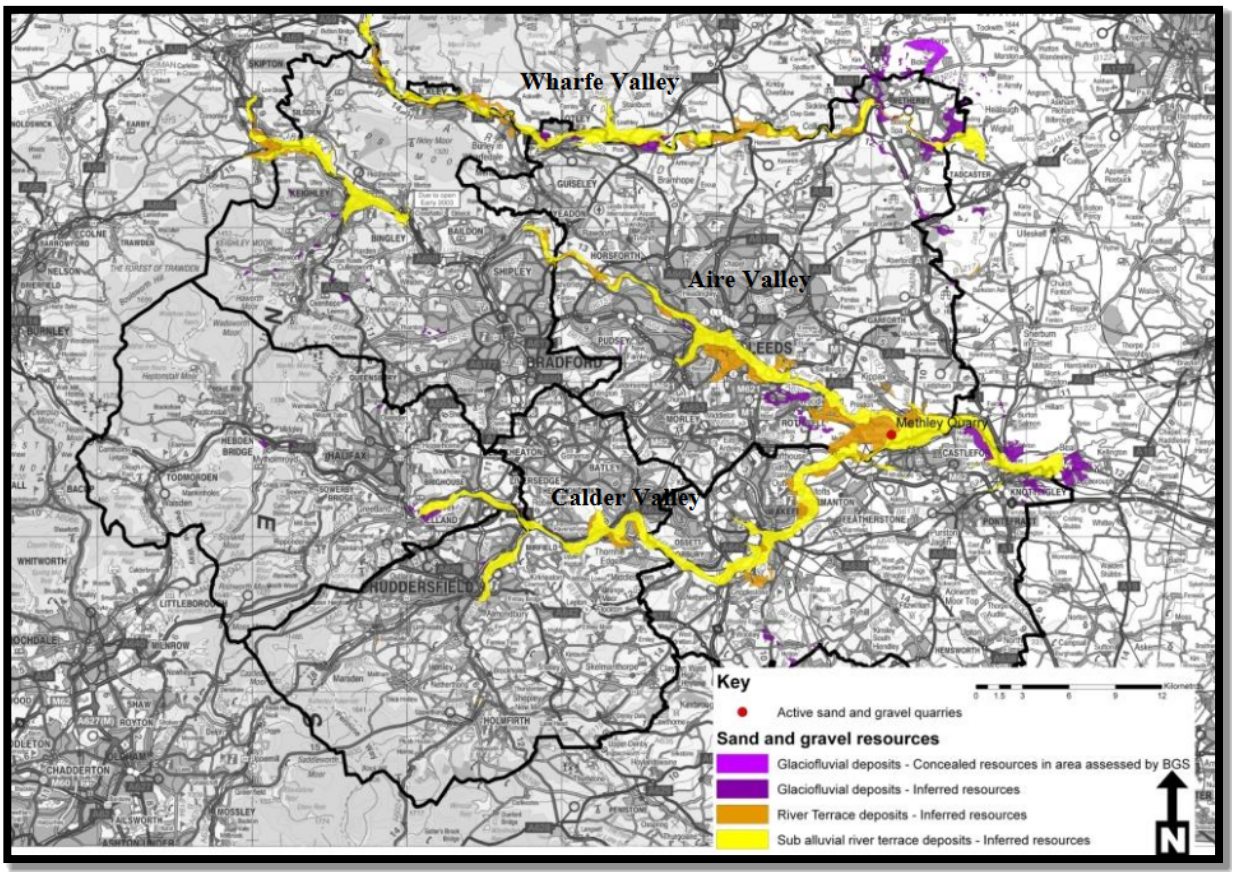
2. MINERAL RESOURCES

2.1. Sand and Gravel

2.1.1. River Terrace sand and gravel deposits are present along the river valleys of the Aire, Calder and Wharfe and some tributaries, as shown in yellow on FIG1 below. The extent and depth of deposits is variable. Only in the Wharfe is the sand and gravel suitable for making high quality concrete. The resource has been extensively worked since the 1930s and the areas are also now restrained by development and in Leeds, by the Natural Resources and Waste Development Plan Document (Local Plan) adopted in Jan 2013, which indicates through policy Minerals 6 that extraction is unlikely to be supported to the east of Pool in the Wharfe Valley.

2.1.2. Small localised glaciofluvial deposits are also present in many areas, as shown in purple on FIG1 below. One deposit at Oulton, Leeds, was worked dry as a borrow pit in the 1960s. There was also a small sand quarry near Boston Spa until the last decade. It is not expected that any glaciofluvial sand and gravel resources could be viably extracted.

FIG2 – West Yorkshire Sand & Gravel Resource



Source: BGS, 2009. West Yorkshire sand and gravel resources: Investigating the potential for an increased sub-regional apportionment.

2.1.3. As discussed in the preceding section, the Yorkshire and Humber Regional Assembly had previously considered significantly increasing West Yorkshire's sand and gravel apportionment, based upon the findings of a report which they had commissioned in 2007 by Land Use Consultants entitled *Phase 2 Sand and Gravel Study for Yorkshire and Humber Appraisal of Apportionment Options*.

2.1.4. This 2007 study broadly calculated the volume of unconstrained sand and gravel resources occurring within the West Yorkshire region. The estimate was calculated using the mapped BGS sand and gravel information for West Yorkshire produced during the Phase 1 study (as shown on FIG1) which was used to calculate the total surface area for sand and gravel resources within West Yorkshire.

2.1.5. Resources that fell within urban areas as defined by the Office of National Statistics urban area dataset was then removed and the remaining area of unconstrained unsterilised resources was calculated. Using this area of unsterilised resources for West Yorkshire, a two-metre average resource thickness and a density of 1.75t/m3 was applied to obtain an estimate of 147 million tonnes of unsterilised resource. This was quoted as the minimum volume of resources, and if a thickness of 10m was assumed then the volume would be 735.3 million tonnes.

2.1.6. However it is now widely accepted that this was a very significant overestimate of the amount of sand and gravel remaining within West Yorkshire which is likely to be viable for extraction. This conclusion is supported by later BGS research in the form of the 2009 study: *West Yorkshire sand and gravel resources: Investigating the potential for an increased sub-regional apportionment*.

2.1.7. This 2009 BGS study was informed by a minerals industry consultation exercise and reported the following key findings:

- The industry estimate that the amount of potentially viable sand and gravel within West Yorkshire, is between 90 – 96% lower than was estimated in the phase II study.
- Only sites containing 1-1.5 million tonnes of sand and gravel (taking up 10-25ha of land) would be likely to be economically viable. Much of the potentially viable sand and gravel resource within West Yorkshire is divided by rivers, canals, railways and roads therefore there are only likely to be a very small number of viable sites.
- The Wharfe Valley is considered to have some of the largest areas of unworked high quality sand and gravel in the region; however the industry regard it as unviable for new extraction sites due to the proximity of landscape/ environmental designations coupled with the potential for relatively strong opposition from local communities.
- The industry have identified 5-10 potential sites for sand and gravel extraction within West Yorkshire; however issues relating to access, environmental, hydrological, and/or planning restrictions are considered too problematic relative to the volumes and quality of reserves to merit developing any of them.

2.1.8. The picture of low sand and gravel West Yorkshire resource viability depicted above appears to be being borne out by the current relatively rapid contraction of the sand and gravel extraction industry within West Yorkshire, with the only extraction site which had previously remained in Leeds, at Methley, being worked out in Summer 2013 and no apparent interest in any renewed extraction in Leeds, Bradford, Wakefield or Calderdale.

2.1.9. West Yorkshire's remaining sand and gravel extraction industry is now limited to one relatively small site in the District of Kirklees. There are currently fewer productive sites than at any time since 1986 and annual output is at a recorded low.

2.2. Sandstone Aggregate

2.2.1. There is wide distribution of quarries producing crushed sandstone; mainly in the millstone grit series of Kirklees, Bradford and Calderdale but also in the coal measure sandstone series, notably the Thornhill Rock in Leeds. Some of the quarries are quite large such as Crosland Moor, Shepley, Bolton Woods and Howley Park, and as such can be regarded as strategically important, in terms of the availability of aggregate resources within West Yorkshire. There are no sandstone aggregate sources in Wakefield.

2.2.2. The sandstones are too weak and porous for the manufacture of concrete or for road building and are commonly used in low specification situations and for bulk fill. However, where investment is made in appropriate processing plant, these materials can make an important contribution and can be used to produce building sand, as well as a washed sand suitable for use in concrete products. These materials are used in large quantities in the manufacture of concrete walling and paving blocks at factories in Calderdale.

2.2.3. No sandstone quarry exists solely to produce aggregate within West Yorkshire; it is produced alongside the extraction of stone for the manufacture of natural stone for walling, cladding and paving. At many sites the aggregate is essentially an occasional by-product and is produced in relatively small quantities for low grade uses.

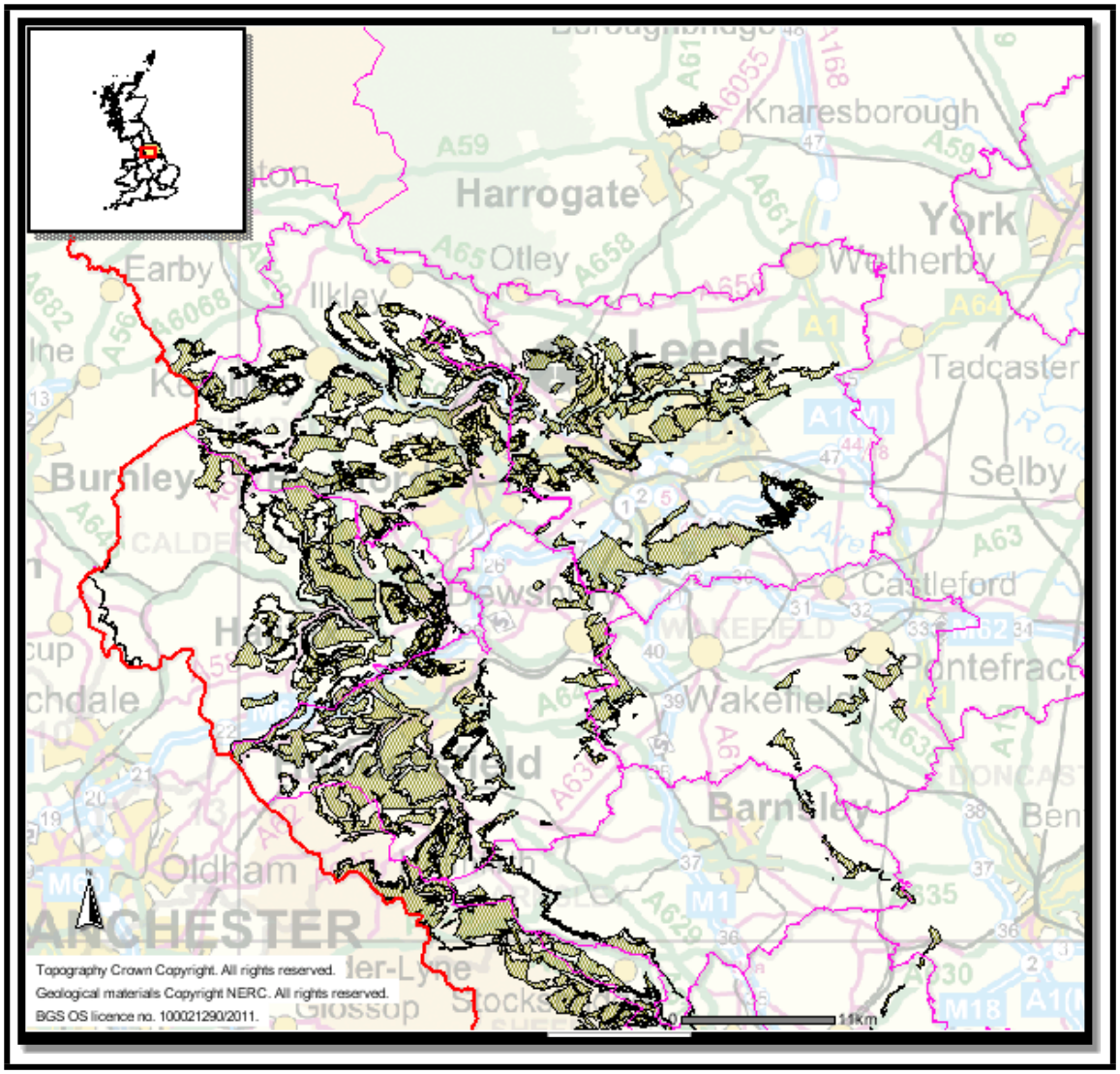
2.3. Building Sandstone

2.3.1. The distribution of quarries for building stone production is the same as for sandstone aggregate – in most cases they are the same. Many of the quarries are very small with a low output tonnage. Often the quarries occupy exposed locations such as Hillhouse, Elland Edge and Harden Moor. The stone is often sawn at a quarry to specific tolerances for walling, cladding and paving.

2.3.2. Much of the building stone quarried in West Yorkshire is of a high quality, particularly paving products which are of national importance, and travels widely to customers across England and into Scotland. Sandstone blocks are also traded between quarries to widen the portfolio of stone types which can be offered. Some producers of cut stone do not actually manage a quarry at all.

2.3.3. At many sites the wastage from the extraction of blocks and from sawing is crushed for aggregate/ bulk fill. Although production of crushed rock aggregates at building stone quarries is usually undertaken on an irregular basis, the annual tonnage of aggregates produced can exceed the weight of the higher value building stones. It is also notable that sandstone is crushed down to building sand at several West Yorkshire quarries, a product which can be used as a good quality alternative to sand derived from sand/ gravel pits. Many quarries have closed since 1986 and the number of active quarry sites has significantly reduced; however several of the remaining quarries have been enlarged, with their activities/ output intensifying.

FIG3 – West Yorkshire Sandstone Resource



Source: BGS, 2015. Minerals Information Online
Available at: http://www.bgs.ac.uk/mineralsuk/maps/maps.html

2.4. Limestone Aggregate

2.4.1. Magnesian Limestone is the common name for a group of dolomite and dolomitic limestones running in a 200 Kilometre long, generally 8 to 12 Kilometre wide, band up the centre of northern England from Nottingham to Sunderland dating from the Permian period. The Magnesian Limestones which occur in the Yorkshire and Humber Region which comprise the Cadeby and Brotherton formations and both of these formations occur and are worked along the eastern edge of the Leeds and Wakefield Districts in West Yorkshire. These formations have historically been extensively quarried and continue to be an important source of construction aggregates, industrial minerals, building stones and agricultural lime.

2.4.2. Security of supply of aggregates derived from Magnesian Limestones is a particularly significant issue for South and West Yorkshire. This is because a significant proportion of the high volumes of construction aggregates consumed in the Leeds and Sheffield City Regions each year are supplied from Magnesian Limestone quarries. The BGS estimate that in 2014 50%-60% of the crushed rock aggregate consumed in South Yorkshire and 20%-30% of the crushed rock aggregate consumed in West Yorkshire was supplied from Doncaster (only Magnesian Limestone is currently worked for aggregate in Doncaster).

2.4.3. Magnesian Limestone aggregates are generally found to be unsuitable to produce coated roadstone (asphalt) due to its insufficient resistance to polishing, with high specification road surfacing aggregate currently primarily supplied into West Yorkshire from quarries situated within the Yorkshire Dales National Park. However approximately 40% of Magnesian Limestone quarries are thought to capable of producing aggregates of sufficient strength to be used as a road sub-base or as a concrete aggregate.

2.4.4. In terms of the uses of the lower strength aggregates produced at the other 60% of quarries, these are understood to include:

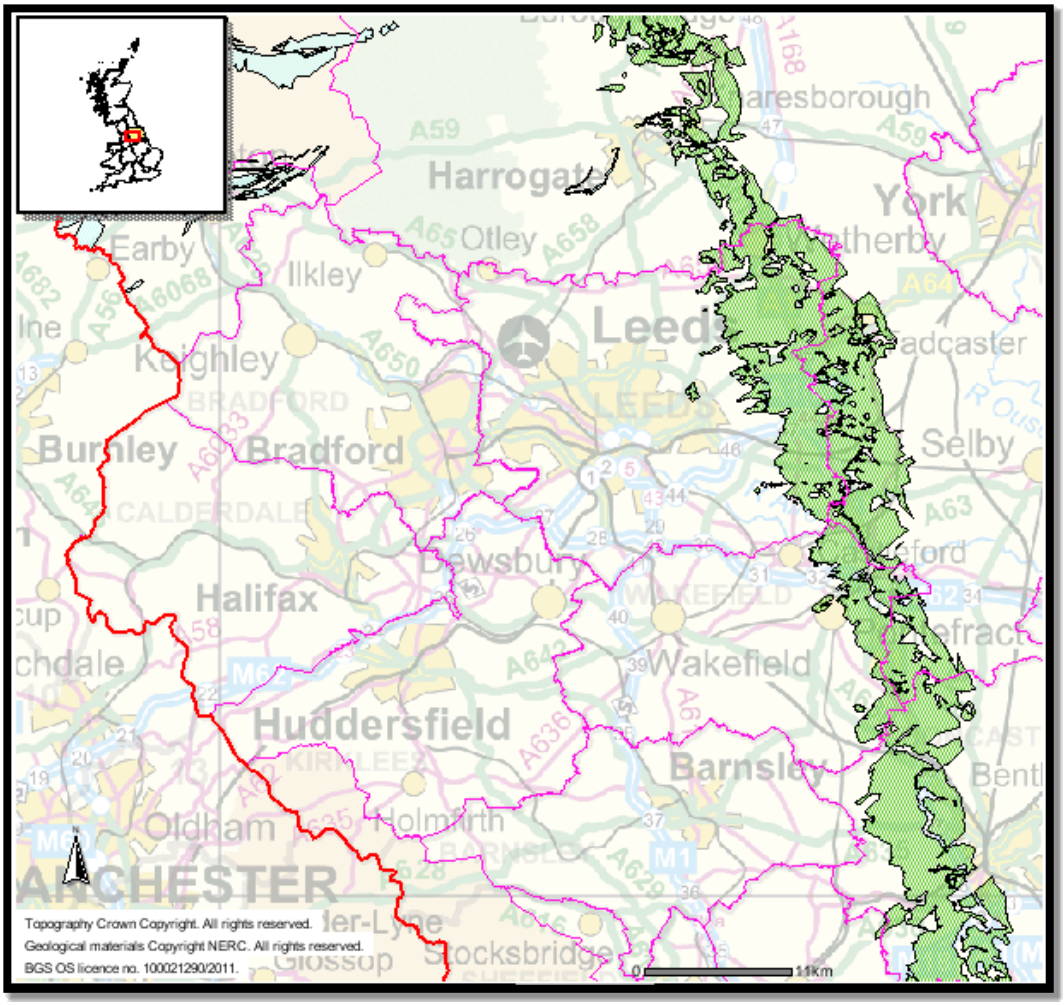
- Decorative chippings
- Bedding for permeable paving
- Pipe Bedding
- Capping material
- Chippings for footpaths, driveways & flat roofs
- Aggregate for land drainage/ filter media
- Bulk Fill
- Aggregate for gabion baskets

2.4.5. Issues associated with the supply of and demand for Magnesian Limestone Aggregates are covered more extensively in the WYCA produced 2017 report: The Quarrying of Magnesian Limestone for Aggregate in the Yorkshire and Humber Region. However in brief this report found that:

> *Due to the variability of the resource and the limitations of its suitability for certain high specification aggregate uses, it is*

acknowledged that Magnesian Limestone aggregates will only ever supply a part of the overall market for construction aggregates. However the further exploitation of remaining Magnesian Limestone resources for aggregates is likely to be an important element of meeting the demand for aggregates into the future, with industry already reporting an increase in demand and Minerals Planning Authorities in North Yorkshire and Leeds and planning for the release of substantial additional reserves.

FIG4 – West Yorkshire Limestone Resource



Source: BGS, 2015. Minerals Information Online
Available at: http://www.bgs.ac.uk/mineralsuk/maps/maps.html

2.5. Building Limestone

2.5.1. The more uniform limestone strata has been extensively quarried on a small scale for local building stone. Currently there is one productive quarry, at Bramham in Leeds. This is a moderately sized unit supplying sawn stone across the region for construction use including elaborate carving. Interest in a further site has resulted in a Preferred Area for a new quarry in Leeds. As with sandstone this quarry is likely to produce a greater tonnage of aggregate. No quarries have opened or closed since 1986.

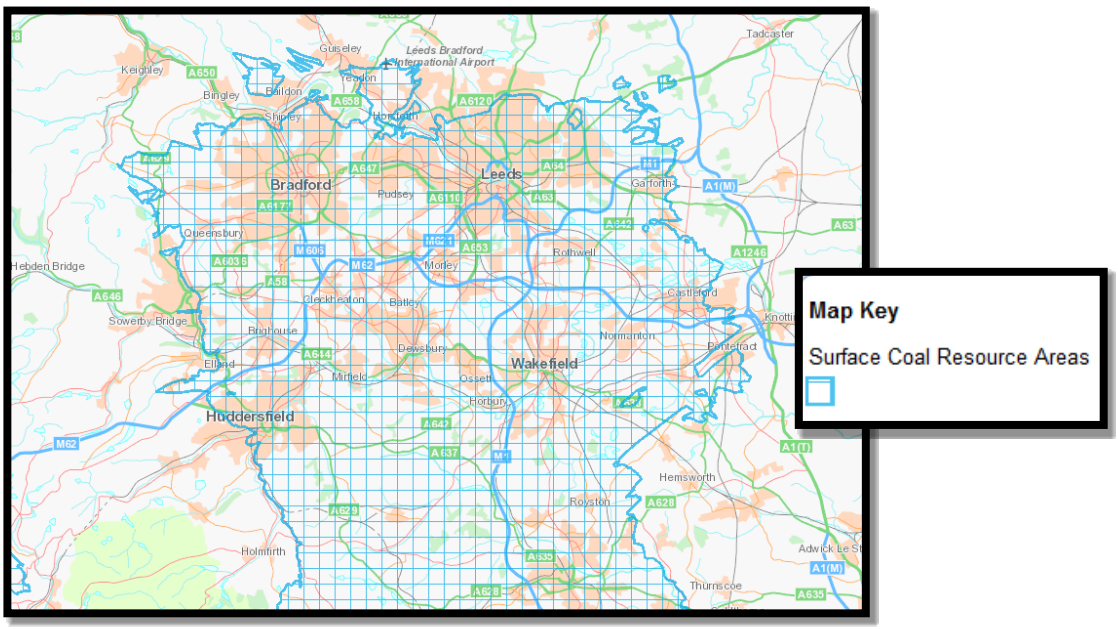
2.6. Coal

2.6.1. Deep mining: Although employing tens of thousands of miners in the past in West Yorkshire the last deep mine in West Yorkshire, Kellingley Colliery in Selby District east of Knottingley, has now closed. The small mine at Hay Royds Clayton West has now shut. The New Crofton Co-op Colliery project proposes to open a new drift coal mine just to the south of New Crofton. The mine will be owned and operated by a workers' Co-operative, New Crofton Co-op Colliery Limited. Planning permission was granted by the planning and highways committee on the 19th of June 2014. Coal mining is not a source of aggregate. Spoil can be used as bulk fill in some load bearing situations.

2.6.2. It should be noted that the New Crofton drift mine will not be producing until 2017 at the earliest and also that it is unlikely to produce any significant quantities of spoil, as the mining method involves backstowing of any spoil within the mine. It should also be noted that the life of the project is likely to be affected by HS2, as the site is now proposed as a carriage works. However colliery spoil sourced from spoil tips has been used historically to provide bulk fill materials for civils projects, e.g. Prince of Wales Colliery for the M62/A1 construction improvements. Some potential areas of spoil are thought to remain which would be suitable sources of fill material for major infrastructure projects.

2.6.3. Opencast mining: Since 1942 there has been widespread opencast coal working in all districts except Bradford and sparsely in Calderdale. The surface coalfield includes a small area of moorland west of Todmorden where there is sporadic interest. Since the mid-1990s opencast coal working has been in steep decline across the coalfield. Currently the only active coal working site is in Wakefield. Opencast coal working is not a source of aggregate.

FIG5 – West Yorkshire Coal Resource



Source: BGS/ Coal Authority, 2016. Interactive Map
Available at: http://mapapps2.bgs.ac.uk/coalauthority/home.html

3. AGGREGATE RESERVES AND SALES

3.1. Sand & Gravel Reserves

3.1.1. Mineral resources are minerals thought to be present within given geographical areas which available geological evidence suggests may be of a quantity and quality which would be of economic interest. The sand and gravel resources within West Yorkshire of potential economic value can be found in the Calder Valley (Kirklees and Wakefield) at the confluence of the Aire and Calder (Wakefield and Leeds) and in the Wharfe valley (Leeds) There is also a small resource area with limited potential in the upper Aire valley (within Leeds) and adjacent to the river Aire in the area east of Esholt (Bradford).

3.1.2. Resources allocated for future extraction are mineral resources which have been identified within Local Plans as being potentially suitable for extraction within the relevant Plan Period. However release of these resources for extraction is subject to planning permission being obtained and any relevant environmental or access issues being addressed. Therefore allocated resources are not considered to constitute mineral reserves for the purposes of the LAA.

3.1.3. For information purposes Table 3 below indicates the extent of sand and gravel site allocations within West Yorkshire. The figure for potential total reserves is a rough estimate based upon certain broad assumptions about the extent, depth and quantity of the sand and gravel resource within the allocated sites/ areas. The release of the allocated resource for extraction would depend upon the resource being deemed to be commercially viable by the extractive industry and an environmentally acceptable development scheme being proposed.

TAB3 – West Yorkshire Sand & Gravel Allocations

Site	**Type of Allocation**
Leeds	
Midgley Farm, Otley	Allocated Site
Methley, Leeds	Extensive Area of Search
Kirklees	
Bradley Island (Bradley)	Area of Search
Wakefield	
Foxholes North of Altofts	Allocated Site
Penbank, Castleford	Allocated Site
The Wyke, Horbury	Allocated Site
Stanley Ferry, Wakefield	Allocated Site
The Strands, Horbury	Allocated Site
Potential Total Reserve	C. 7.5 Million tonnes

3.1.4. Mineral reserves are resources which have been granted planning permission for extraction. Certain old minerals planning permissions have been registered as dormant and therefore the reserves which these permissions cover could not be worked without further permissions being obtained.

3.1.5. Reserves at dormant minerals sites normally form part of the BGS standard landbank calculation methodology. However, given the low level of sand and gravel reserves and output, it is considered that the inclusion of dormant reserves would lead to the calculation of a misleadingly inflated landbank figure within West Yorkshire. Therefore reserves at dormant sand and gravel pits have not been treated as permitted reserves for the purposes of calculating the West Yorkshire sand and gravel landbank.

3.1.6. As of 31 December 2017 only one site remains within West Yorkshire with permitted reserves of sand and gravel. This site, located within Kirklees, began production in late 2014. At the current rate of extraction reserves at the site will be exhausted within 7 years. The only remaining active sand and gravel extraction site located within the District of Leeds closed in July 2013 and no extraction now takes place outside of Kirklees.

3.1.7. The previous application to reactivate a dormant sand and gravel site within Wakefield was withdrawn some years ago. Although BGS mapping indicates that limited sand and gravel resources may remain within Calderdale and Bradford, no permitted reserves are present within either of these two Districts. The total West Yorkshire reserve of Sand and Gravel as of 31 December 2017 was 0.67 million tonnes.

3.1.8. Table 4 below sets out regional level sand and gravel reserves data, as presented within the Yorkshire and Humber Aggregate Working Party Annual Monitoring Report 2017. It is notable that total Regional sand and gravel reserves appear to have declined relatively rapidly after 2012 and in 2014 were some 20% lower than reserves in 2005. However, after 2014, Regional sand & gravel reserves have recovered well and are now at the highest level seen for over a decade.

3.1.9. West Yorkshire consistently provides for a relatively insignificant proportion of regional reserves, with only 2% of the 2017 Yorkshire and the Humber Sand and Gravel Reserve contained within West Yorkshire.

TAB4 – Yorkshire & Humber Sand and Gravel Reserves 2007-2016

Sub-Region	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Aggregate Land-won Sand and Gravel Reserves										
North Yorkshire	20.65	20.02	18.4	17.98	16.24	19.1	18.63	16.9	19.5	20.5
South Yorkshire	10.14	10	5	5.7	5.79	5.67	5.95	2.29	4.2	8.78
West Yorkshire	-	-	0.33	0.25	0.2	0.14	0	0.88	0.99	0.77
East Riding and North Lincolnshire	-	-	14.4	9.3	11.1	9.7	8.1	7.9	7.06	7.62
Total Yorkshire and Humber	**30.79**	**30.02**	**38.13**	**33.23**	**33.33**	**34.61**	**32.68**	**27.97**	**31.75**	**37.67**

Source: Yorkshire and Humber Aggregate Working Party Annual Monitoring Report 2017

3.2. Sand & Gravel Sales

3.2.1. Sales of sand and gravel originating from West Yorkshire have steadily declined for over 20 years, consistent with the number of operating sites and their size. Sites which have closed have not been replaced. Gravel for concreting purposes is no longer produced. Between 2015 and 2017 the West Yorkshire sand and gravel extraction industry has comprised only a single modestly sized sand and gravel extraction site.

3.2.2. Table 5 below sets out regional level sand and gravel sales data, with West and South Yorkshire amalgamated for confidentiality reasons, as presented within the Yorkshire and Humber Aggregate Working Party Annual Monitoring Report 2017.

TAB5 – Yorkshire & Humber Sand and Gravel Sales 2007-2016

Sub-Region	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Aggregate Sand and Gravel Sales										
North Yorkshire	2.7	2.3	1.7	1.6	1.7	1.6	1.5	1.7	1.7	1.7
South and West Yorkshire[1]	0.4	0.4	0.5	0.26	0.24	0.24	0.18	0.21	0.54	0.62
East Riding and North Lincolnshire	1.3	1.13	1.0	0.59	0.71	0.56	0.91	0.93	0.92	0.9
Total Yorkshire and Humber	**4.4**	**3.83**	**3.2**	**2.45**	**2.65**	**2.4**	**2.59**	**2.83**	**3.16**	**3.22**

Source: Yorkshire and Humber Aggregate Working Party Annual Monitoring Report 2017

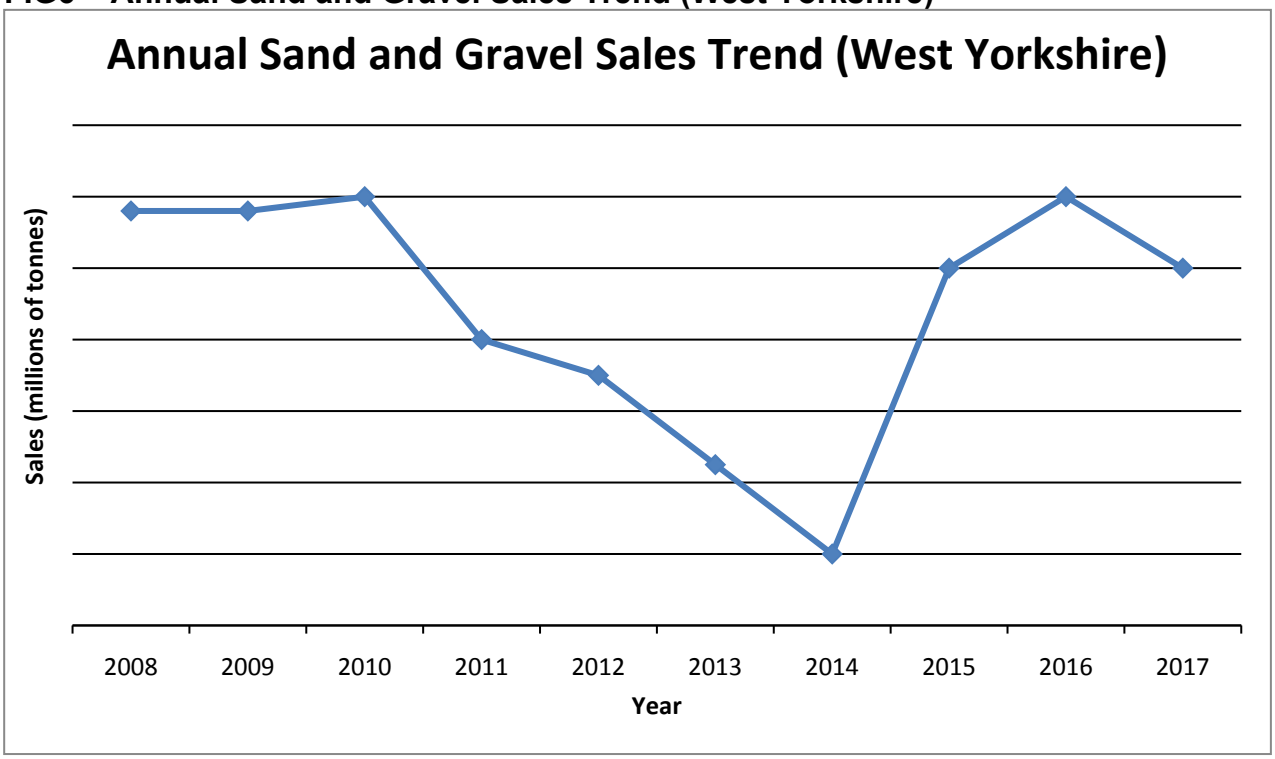
3.2.3. It is notable that West and South Yorkshire sales of Sand and Gravel comprise 19% of the Regional Total and have remained at a level which is very low in historical terms for over a decade. Furthermore total Yorkshire and Humber sales, which now appear to be on an upward trajectory following the post-recession low, have nonetheless declined by 27% between 2007 and 2016. The total annual output of sand and gravel within the Yorkshire and Humber Region now represents only 66% of the 4.9 million tonne figure which the government estimated to be necessary to maintain adequate aggregate supplies in 2009.

3.2.4. The first West Yorkshire LAA, calculated a 2012 West Yorkshire sand and gravel sales figure from direct operator reporting and separated out 2004-2011 combined sales data using a % proxy. Table 6 below shows the West Yorkshire figures calculated within the first LAA and includes a 2013 figure for West Yorkshire based upon direct reporting by the relevant Planning Authorities. The 2014 to 2017 figures have been used to calculate the 10 year sales average but have been obscured within the table for commercial confidentiality reasons. Figure 6 illustrates the ten year sales trend, with the Y Axis removed for confidentiality reasons.

TAB6 – West Yorkshire Sand and Gravel Sales 2008-2017

Annual Sand and Gravel Sales Trend (West Yorkshire)											
Note: All Figures in Million Tonnes	**2008**	**2009**	**2010**	**2011**	**2012**	**2013**	**2014**	**2015**	**2016**	**2017**	**Ten Year Average**
W Yorks Sales	0.12	0.12	0.12	0.08	0.07	0.05	-	-	-	-	**0.09**

FIG6 – Annual Sand and Gravel Sales Trend (West Yorkshire)



3.2.5. Based upon the above figures a West Yorkshire 10 year annual average sand & gravel sales figure of 0.09 million tonnes can be calculated. As stated in paragraph 3.1.7 above, West Yorkshire sand and gravel reserves, as of 31 December 2016 were 0.67 million tonnes and therefore the landbank of sand and gravel within West Yorkshire, based on 10 year average sales levels, can be calculated as being:

7 years and 5 months

3.2.6. The above landbank figure represents a decrease of 1 year and 2 months from the landbank figure calculated in the West Yorkshire LAA 2017 (8 years and 7 months). The decreasing landbank is due to permitted reserves being extracted and not replenished. Other information relevant to setting a sand and gravel apportionment figure and deriving a more appropriate landbank is assessed in Section 4 below.

3.3. Crushed Rock Reserves

3.3.1. Minerals resources within West Yorkshire capable of producing crushed rock aggregates include the Carboniferous Sandstones found throughout a large proportion of West Yorkshire, but particularly prevalent in the administrative Districts of Bradford, Calderdale and Kirklees, and the Dolomitic (Magnesian) Limestones found in a strip running along the eastern boundaries of the Districts of both Leeds and Wakefield.

3.3.2. The characteristics of these resources are described further in Section 2 above; however it is worth reiterating that "In general, the Carboniferous sandstones in Yorkshire are too weak and porous and susceptible to frost damage for them to be used for good quality roadstone or concrete aggregate"[3]. Nonetheless it is possible to utilise the sand which can be produced by crushing down Carboniferous Sandstones as a building and concreting sand and to produce reconstituted stone building blocks.

3.3.3. As of 31 December 2017 thirty-two quarries existed within West Yorkshire which either actively produce or have in the recent past produced crushed sandstone or limestone aggregates (see Appendix 1). Crushed rock aggregate is produced in all five West Yorkshire districts, sometimes in significant quantities, but more frequently in small quantities as a by-product of building stone quarrying. At some quarry sites especially in Calderdale and Bradford the amount of aggregate product is insignificant. However relatively significant quantities of crushed sandstone aggregates are incorporated into artificial stone paving and walling products. Howley Park, Shepley and Moselden quarries are also known to be major suppliers to the concrete works at Southowram.

3.3.4. Conversely Dolomitic Limestone, which is potentially capable of producing a higher quality concrete and road stone grade aggregate, is currently only actively produced in Wakefield, at two locations adjacent to Knottingley. At Darrington Quarry Mineral is trucked beneath the M62 to a processing plant. This aggregate is washed to remove fines, thereby achieving a higher specification for its afteruse. The total West Yorkshire reserve of Crushed Rock Aggregate as of 31 December 2017 is estimated to have been 38.78 million tonnes.

3.3.5. Table 7 below sets out regional level crushed rock aggregate reserve data for the 2007-2016 period. Table 8 provides the West Yorkshire reserve figures for the period 2006-2017. In terms of the degree of confidence which should be placed upon these figures it should be noted that in several instances, where site operators have not provided survey returns, reserves have been estimated. There is also likely to be some variation in the accuracy of operator assessments of the proportion of reserves which are to be used for building stone vs. aggregates as this may not be apparent until the stone has been won.

[3] British Geological Survey, 1996. *A geological Background for Planning and Development in the City of Bradford Metropolitan District, Volume 2: A Technical Guide to Ground Conditions.* BGS: Nottingham, page 37.

TAB7 – Yorkshire & Humber Crushed Rock Reserves 2007-2016

Sub-Region	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Aggregate crushed rock Reserves										
North Yorkshire	225.1	220.7	210.1	204.6	202.2	191.82	189.79	185.91	178.99	170.7
South Yorkshire	60.8	58.8	63.4	62.4	61.23	60.8	59.5	57.6	56.58	52.10
West Yorkshire	40.8	40	27.14	15.74[(1)]	15.44[(1)]	28.5	30.4	25.7	33.74	29.82
East Riding and North Lincolnshire	-	-	1.7	5.6	10.78	10.88	12.7	12.95	13.39	13.09
Total Yorkshire and Humber	**326.7**	**319.5**	**302.34**	**288.34**	**289.65**	**292**	**292.39**	**282.16**	**282.7**	**265.71**

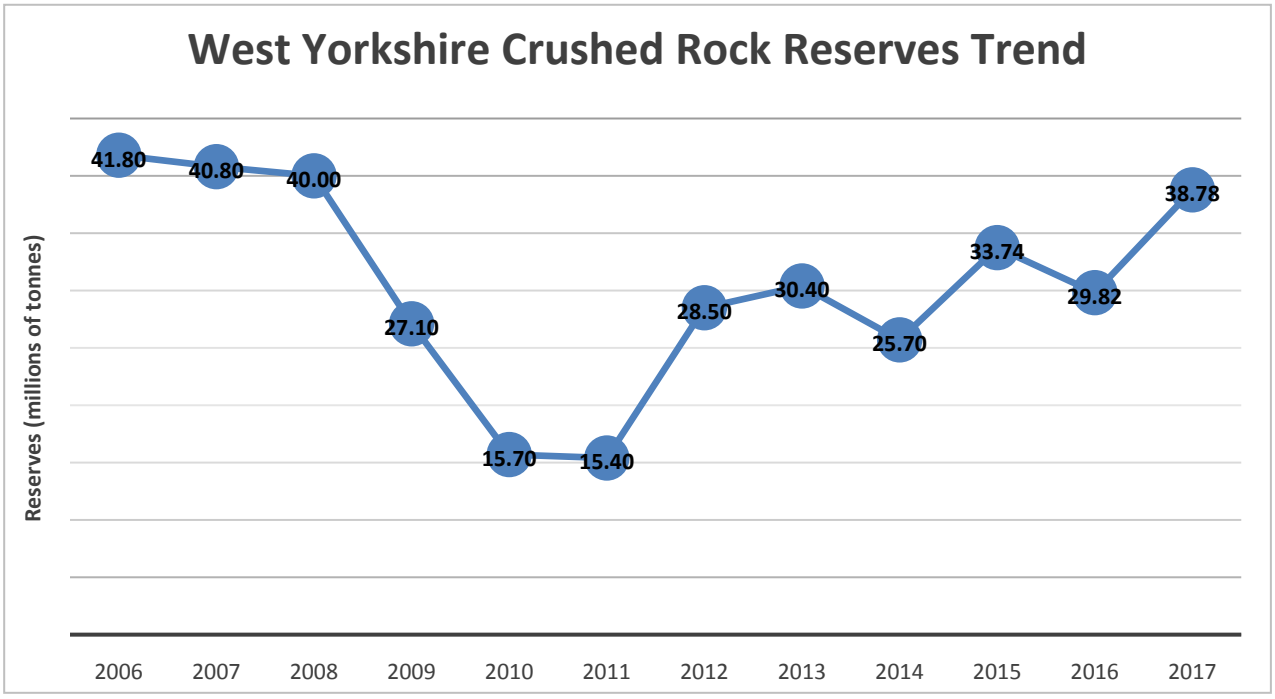
Source: Yorkshire and Humber Aggregate Working Party Annual Monitoring Report 2017

TAB8 – West Yorkshire Crushed Rock Reserves 2006-2017

Crushed Rock Reserves Trend (West Yorkshire)												
Note: All Figures in Million Tonnes	**2006**	**2007**	**2008**	**2009**	**2010**	**2011**	**2012**	**2013**	**2014**	**2015**	**2016**	**2017**
W Yorks	41.80	40.80	40.00	27.10	15.70	15.40	28.50	30.40	25.70	33.74	29.82	38.78

Note: Figures for 2006-2009 taken from RAWP Annual Monitoring Reports; figures in orange are acknowledged to be incomplete

FIG7 – Crushed Rock Reserves Trend



3.3.6. It is notable that both the Yorkshire and Humber total crushed rock aggregate reserves and the West Yorkshire reserves appear to have experienced a minor downturn in 2016 following a steady upwards trajectory from the post-recession low of 2010/ 2011. However this dip appears to have been corrected in 2017, with reserves in West Yorkshire continuing on their previous upwards trend.

3.3.7. Changes in reserves will usually relate to either new reserves being permitted, existing reserves being exhausted or operator reassessments of the quantities of reserves present at their site - which may be refined as

working progresses and may change significantly over the lifetime of a quarry. Any significant change in reserves year on year may be a factor of any one of these causes or a combination of several.

3.3.8. The incomplete figures for 2010 and 2011 may account, to some extent, for the low reserves reported during these years. However it is possible that the recession may also have been a factor, with potentially certain quarries going out of business and/ or operators coming to the conclusion that certain of their reserves were no longer financially viable to extract in the economic climate of the time.

3.3.9. Equally it is considered likely that the improvement in economic conditions since 2011 has been a factor in the generally upwards trajectory in reserve levels since that time. This positive association between an improving economy and increasing aggregate reserves may be due to new reserves being permitted. However it may also be partly due to higher minerals values leading to operators reassessing the viability of extracting those existing quarry reserves which may have previously been considered uneconomic due to quality or stripping ratio factors, and consequently increasing their reported reserve estimates.

3.3.10. In terms of specific factors associated with recent reserve level variations, the 2016 figures were affected by an acknowledged miscalculation (underestimation) of reserves at a relatively large quarry in Leeds during the 2016 reporting period. Furthermore the correction of a double counting issue relating to Magnesian Limestone quarries on the boundary between Wakefield and North Yorkshire may account, to some extent, for the 2016 dip.

3.3.11. However, notwithstanding the plausibility of the explanations suggested above, without further study it is not possible to confirm the factors which have led to the year on year changes in reserve levels depicted in Figure 7 above. It should also be noted that a small number of large quarries make up a disproportionately large proportion of the apparent reserves, with the majority of the 32 quarries listed at Appendix 1 being relatively small building stone quarries with limited reserves and output, many of which only sporadically produce aggregates.

3.4. Crushed Rock Sales

3.4.1. Table 9 below sets out regional level crushed rock aggregate sales data for the 2007-2016 period. Table 10 and Figure 8 provide ten year West Yorkshire sales data for the 2008-2017 period.

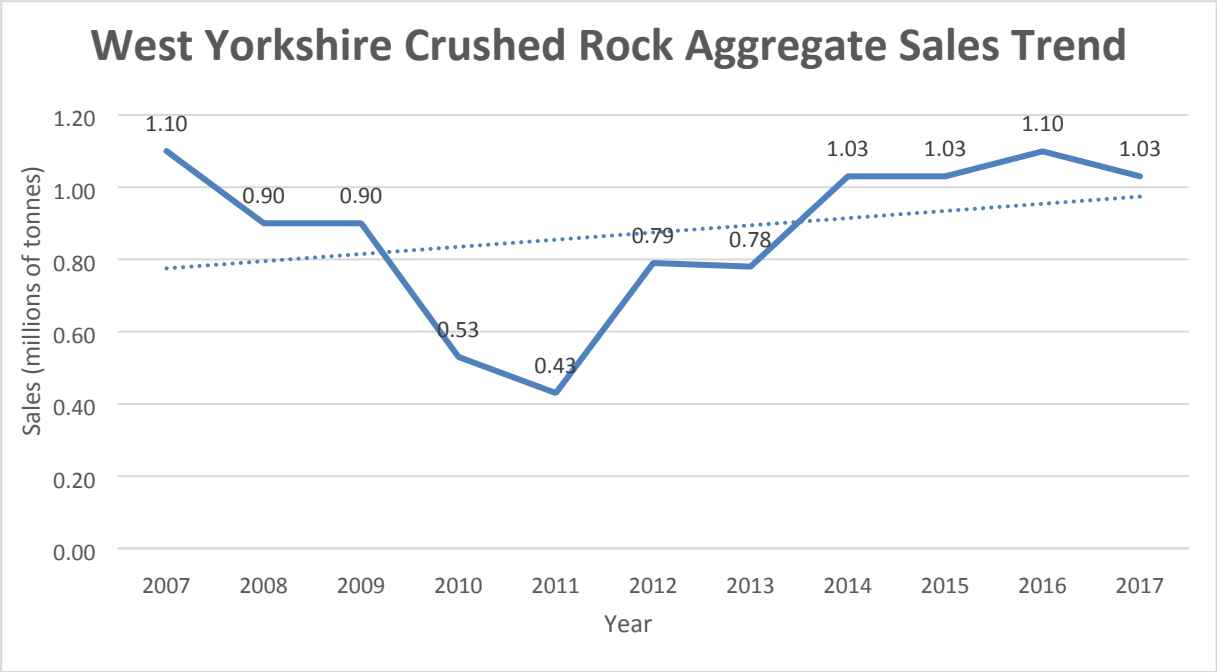
TAB9 – Yorkshire & Humber Crushed Rock Sales 2007-2016

Sub-Region	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Aggregate Crushed Rock Sales										
North Yorkshire	8.3	7.7	5.3	5.51	4.45	5.33	5.65	6.49	7.04	6.67
South Yorkshire	2.3	2.2	1.4	1.1	1.05	1.14	1.27	2.25	2.4	2.6
West Yorkshire	1.1	0.9	0.9	0.53	0.43	0.79	0.78	1.03	1.03	1.10
East Riding and North Lincolnshire	0.3	0.2	0.1	0.16	0.23	0.21	0.21	0.75	0.75	0.85
Total Yorkshire and Humber	**12.0**	**11.0**	**7.7**	**7.30**	**6.16**	**7.47**	**7.91**	**10.52**	**11.22**	**11.22**

TAB10 – West Yorkshire Crushed Rock Sales 2008-2017

Annual Crushed Rock Aggregate Sales Trend (West Yorkshire)											
Note: All Figures in Million Tonnes	**2008**	**2009**	**2010**	**2011**	**2012**	**2013**	**2014**	**2015**	**2016**	**2017**	**Ten Year Average**
W Yorks Crushed Rock Sales	0.90	0.90	0.53	0.43	0.79	0.78	1.03	1.03	1.10	1.03	**0.85**

FIG8 – Crushed Rock Sales Trend



3.4.2. It should be noted that, after remaining stable for a number of years at between 1.1 and 1.2 million tonnes per annum, sales of crushed rock aggregates from West Yorkshire declined relatively substantially between 2007 and 2011, before beginning to recover in 2012. The recovery of the West Yorkshire crushed rock aggregate quarrying industry appears to have continued into 2017, with sales remaining over 1 million tonnes per annum, albeit dipping back slightly from the post-recession high achieved in 2016.

3.4.3. An overall significant decline in Yorkshire and Humber quarry output is also evident between 2007 and 2011. However, similarly to the West Yorkshire trend, regional quarry output has been on a generally upwards trend from its low of 2011, with a strong upward trajectory apparent between 2011 and 2015. The apparent levelling off of the upward trend in regional sales may be due to the 2013-2015 double counting issue identified in paragraph. 3.3.6, above. If this double counting issue is allowed for then the upwards trend in regional crushed rock aggregate sales can been seen to have continued up to the last reserve assessment in 2016.

3.4.4. It is also worth noting that the 2016 total sales of crushed rock aggregates from the Yorkshire and Humber Region, at 11.22 million tonnes, are 12% below the 13.25 million figure which the government estimated to be necessary to maintain adequate aggregate supplies in 2009. The West Yorkshire 10 year crushed rock sales average 2008-2017 stands at 0.85 million tonnes. With reserves as of 31 December 2017 at 38.78 million tonnes the landbank of crushed rock aggregates within West Yorkshire, based on 10 year average sales levels, can therefore be calculated as being:

45 years and 7 months

3.4.5. This landbank figure represents an increase of 10 years and 11 months from the landbank figure calculated in the West Yorkshire LAA 2017, which was 34 years and 8 months. This increase can mainly be explained by an acknowledged anomaly in the 2016 data returns for one of the quarries in Leeds, with the operator very substantially underestimating reserves.

3.4.6. Notwithstanding the still very significant level of the crushed rock aggregate landbank in West Yorkshire, a substantial proportion of reserves are known to be tied up in old Building Stone quarries with low intensity/ intermittent working. Therefore parts of the apparent West Yorkshire crushed rock aggregate reserve may be unlikely to yield significant quantities of aggregate in the short/ mid-term.

3.4.7. Furthermore, as discussed more extensively elsewhere in this report, it must be acknowledged that the West Yorkshire aggregate reserve is predominated by material which is unlikely to be capable of meeting the specifications required for the two principal construction aggregate uses of concrete manufacture and road construction. Other information relevant to setting an appropriate crushed rock apportionment for use in landbank calculation is assessed in Section 4 below.

4. APPRAISAL OF OTHER RELEVANT INFORMATION

In addition to appraising aggregate reserve and sales data paragraph 207 of the National Planning Policy Framework makes it clear that Local Aggregate Assessments should consider other relevant local information, and include an assessment of all supply options (including marine dredged, secondary and recycled sources) before arriving at a landbank calculation methodology.

The National and Regional Guidelines for Aggregate Provision are also relevant; however it is not expected that the pre-existing system of regional and sub-regional apportionments will simply be rolled forward.

The following section sets out the other information which the West Yorkshire Mineral Planning Authorities considers to be relevant to the assessment of the minerals supply situation within West Yorkshire. This information has been used to inform the proposed landbank calculation methodology set out in Section 5.

4.1. Aggregate Flows to and from West Yorkshire

4.1.1. West Yorkshire is and will continue to be a significant net importer of aggregates. This is primarily due to the simple fact that West Yorkshire accommodates 42% of the population of the Yorkshire and Humber Region within 13% of the Region's total land area. Demand for aggregates is high, the nature of the geology limited, in terms of its ability to produce certain higher specification aggregates, and the accessibility of the remaining un-worked aggregate resource constrained.

4.1.2. The inability of West Yorkshire to meet its own aggregate needs is evidenced by tables 11 and 12 below, which provide figures indicating the proportion of aggregate consumption which is met by imports for the four sub-regions of Yorkshire and Humber. The figures set out in these tables are taken from the BGS/ CLG document 'Collation of the results of the 2009 aggregate minerals survey for England and Wales', other than the sales figure which is taken from the tables set out in Section 3 above.

4.1.3. The collation of the 2014 BGS Aggregate Minerals Survey has now been published and additional figures have been provided to Local Authorities providing data on consumption and minerals flows in 2014, as analysed in Tables 13 and 14 below. TAB11 below compares AM 2009 and AM 2014 data and provides an updated assessment of the proportion of aggregate consumption which is met by imports for the 4 relevant parts of the Yorkshire and Humber Region.

TAB11 – Proportion of CR Consumption Met By Imports for Y&H Sub-regions

NB. Figures are in thousands of tonnes	Crushed Rock Sales		Crushed Rock Imports		Crushed Rock Consumption		% of Consumption Met by Imports		% Change 2009 to 2014
	2009	2014	2009	2014	2009	2014	2009	2014	
Humber (East Riding, North Lincolnshire and North East)	100	750	592	700	789	724	75%	97%	+22%
North Yorks, Yorkshire Dales and North York Moors National Parks	5,300	6,490	470	526	2,322	2,801	20%	19%	-1%
South Yorkshire	1,400	2,250	1,068	971	2,106	2,124	51%	46%	-5%
West Yorkshire	900	1,030	1,860	1,997	2,332	2,536	80%	79%	-1%

TAB12 – Proportion of S&G Consumption Met By Imports for Y&H Sub-regions

NB. Figures are in thousands of tonnes	Sand & Gravel Sales		Sand & Gravel Imports		Sand & Gravel Consumption		% of Consumption Met by Imports		% Change 2009 to 2014
	2009	2014	2009	2014	2009	2014	2009	2014	
Humber (East Riding, North Lincolnshire and North East)	1,000	930	287	305	743	424	39%	72%	+33%
North Yorks, Yorkshire Dales and North York Moors National Parks	1,700	1,700	179	207	809	1,116	22%	19%	-3%
South Yorkshire	500	210	415	751	719	760	58%	99%	+41%
West Yorkshire			764	685	810	702	94%	98%	+4%

4.1.4. The consumption figures included in the above tables are calculated using sales by destination data, including sales within the home region, imports from other regions and imports from outside England and Wales. It should be noted that the report cautions that the figure for total consumption slightly underestimates true consumption because for some regions unallocated sales have an unknown destination. Furthermore consumption figures are calculated from the principal destination of aggregate flows. Final sales, particularly for rail-borne aggregates, may be to other regions

4.1.5. However it is considered that the quality of the data is sufficient to draw broad conclusions about the relative reliance of the different parts of the Yorkshire and Humber Region upon aggregate imports and how this has changed between 2009 and 2014. The data broadly shows that all sub-areas of the Yorkshire and Humber Region are heavily reliant on aggregate imports to meet demand for primary aggregates, except for North Yorkshire.

4.1.6. The substantial increase in the reliance of the Humber Area and South Yorkshire on imports of sand and gravel between 2009 and 2014 is also considered to be significant, as is the fact that both south and west Yorkshire are now almost 100% reliant on imports of sand and gravel from neighbouring authorities. Although some decrease in the reliance of North, South and West Yorkshire upon crushed rock aggregate imports between 2009 and 2014 is indicated by the data, this reduction is relatively small and it is clear that West and East Yorkshire/ The Humber Area remain substantially reliant on crushed rock imports to meet demand. The reliance of the Humber Area on crushed rock imports appears to have increased substantially between 2009 and 2014.

4.1.7. Conversely, as described in more detail in the subsequent section, the scale of urban development present within West Yorkshire means that it has very substantial recycled and secondary aggregate (RSA) resources. Discussions with a selection of RSA producers indicate that most RSA produced within West Yorkshire is also consumed within West Yorkshire. They range from one producer stating that 50% is sent out of the county to another producing stating that all RSA which they produce is thought to be consumed locally.

4.1.8. West Yorkshire appears therefore to have some significance as an RSA exporter counterbalancing to a degree the imports of primary aggregate. However, there is no available reliable data on the spatial distribution of flows of RSA between regions/ sub-regions, and therefore the precise trade balance between primary aggregate and RSA imports/ exports cannot be quantified.

4.1.9. In terms of the sources of the aggregate imported into West Yorkshire to meet its needs, available data is not comprehensive; however recent figures released by the British Geological Survey informed by their National Aggregate Minerals Survey 2014 are set out in tables 13 and 14 overleaf.

TAB13 – Estimated Origins of Sand & Gravel Supplied Into West Yorkshire

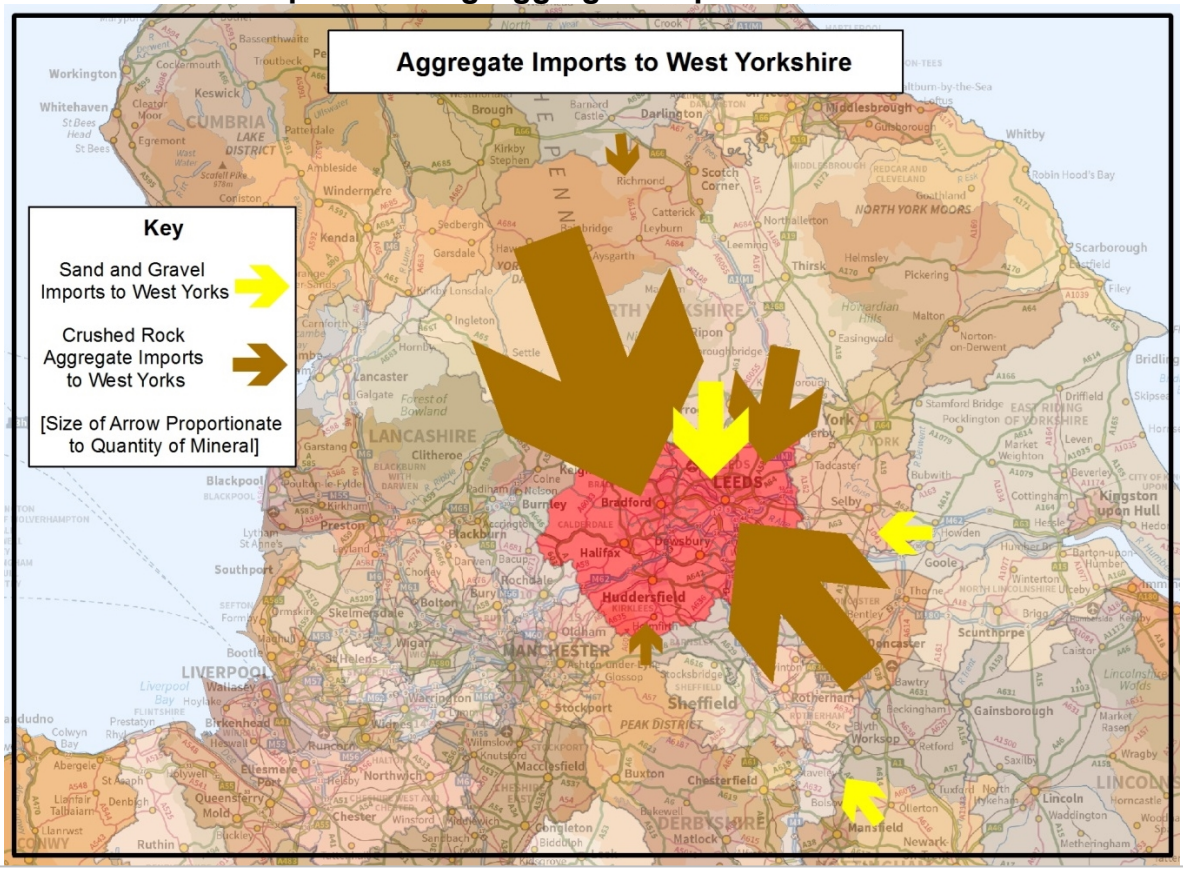
Note: All figures in Tonnes	Estimated Exports of Sand & Gravel to West Yorkshire 2009	Estimated Exports of Sand & Gravel to West Yorkshire 2014	Change	BGS Estimated Exports of Sand & Gravel to West Yorkshire 2014	
				Lower	Upper
North Yorkshire County Council	240,000	315,900	75,900	280,800	351,000
East Yorkshire	150,000	175,500	25,500	140,400	210,600
East Midlands (Nottinghamshire)	3,880	105,300	101,420	70,200	140,400
East Midlands (Lincolnshire)		38,610	38,610	7,020	70,200
North-East (Durham)		38,610	38,610	7,020	70,200
North-West (Chesh West/ Chesh East)	69,510	38,610	-30,900	7,020	70,200
West Midlands (Staffordshire)		38,610	38,610	7,020	70,200
South Yorkshire (Doncaster)	73,220	3,861	-69,359	702	7,020
Total W Yorks Consumption	**810,000**	**702,000**	**-108,000**	**702,000**	

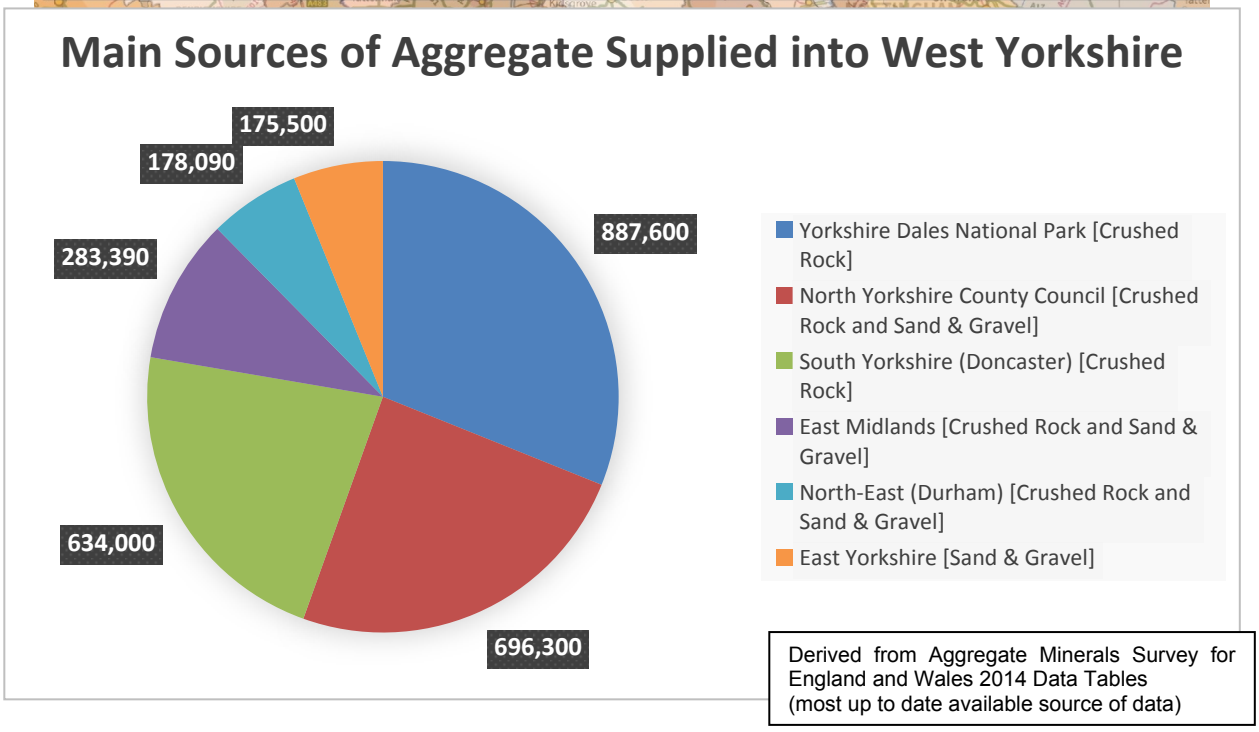
TAB14 – Estimated Origins of Crushed Rock Supplied Into West Yorkshire

Note: All figures in Tonnes	Estimated Exports of Crushed Rock to West Yorkshire 2009	Estimated Exports of Crushed Rock to West Yorkshire 2014	Change	BGS Estimated Exports of Crushed Rock to West Yorkshire 2014	
				Lower	Upper
Yorkshire Dales National Park	453,250	887,600	434,350	760,800	1,014,400
South Yorkshire (Doncaster)	141,020	634,000	492,980	507,200	760,800
North Yorkshire County Council	250,000	380,400	130,400	253,600	507,200
East Midlands (Derbyshire)	478,384	139,480	-338,904	25,360	253,600
North-East (Durham)		139,480	139,480	25,360	253,600
North-West	79,161	13,948	-65,213	2,536	25,360
Total W Yorks Consumption	**2,332,000**	**2,536,000**	**204,000**	**2,536,000**	

4.1.10. Figure 9 below illustrates this estimated spatial distribution of aggregate flows into West Yorkshire, with the size of the arrow indicating the approximate relative quantity of aggregate estimated to flow from the producing area. A pie chart is also included providing a more precise breakdown of the sources of the land won construction aggregates supplied into West Yorkshire in 2014.

FIG9 – Flow Map Illustrating Aggregate Imports to West Yorkshire





4.1.11. The above information illustrates the almost complete reliance of West Yorkshire on the continued supply of aggregates produced outside of West Yorkshire to meet the needs of its dense urban population in terms of construction and other industrial uses. The Yorkshire Dales National Park and Doncaster are acknowledged to be the most important suppliers of crushed rock aggregates into West Yorkshire, with lesser, but still significant, quantities supplied from the North Yorkshire County Council administrative area and Derbyshire and the Peak District.

4.1.12. In relation to Sand and Gravel, the North Yorkshire County Council administrative area is highlighted as the key supplier into West Yorkshire, with significant quantities of sand and gravel also thought to be transported into West Yorkshire from East Yorkshire and Nottinghamshire. The publication of the BGS AM2014 data allows some comparative analysis to be made between minerals flows into West Yorkshire in 2009 and 2014.

4.1.13. This comparative analysis indicates that there may have been a substantial increase in the dependence of West Yorkshire on crushed rock aggregate derived from the Yorkshire Dales National Park and from Doncaster in South Yorkshire between 2009 and 2014. The analysis also indicates that the quantity of aggregate imported to West Yorkshire from Derbyshire and the Peak District is significantly lower than was previously assumed.

4.1.14. However there are significant differences between the methodologies used to calculate the minerals flows into West Yorkshire for 2009 and 2014 and therefore caution should be exercised in terms of coming to any definite conclusions about any real world shifts in minerals supply patterns between 2009 and 2014 based upon these data.

4.1.15. Nonetheless, as discussed further in following sections, it is clear, that planning for continuity in the supply of the aggregates consumed in West Yorkshire is far more dependent upon effectively cooperating with neighbouring authorities than managing aggregate supplies within West Yorkshire itself. It is also clear that the future of aggregate extraction within the Yorkshire Dales National Park is of key strategic economic importance to West Yorkshire.

4.2. Recycled and Secondary Aggregates (RSA)

4.2.1. A large proportion of West Yorkshire is covered by urban development which comprises a rich potential source of recycled aggregates arising from the demolition of buildings, clearance of sites and construction of new developments.

4.2.2. Sources of secondary aggregates are much more limited with the only power station producing pulverised fuel ash (pfa), Ferrybridge Power Station, now closed, albeit with a smaller new 68 MW multi-fuel power station continuing to operate at the site. Several other multi-fuel or energy from waste power plants also operate within West Yorkshire which are also a potentially significant source of bottom ash derived secondary aggregate.

4.2.3. Very little aggregate derived from mineral waste has been generated in West Yorkshire for many years. Materials such as metallurgical slags, burnt colliery spoil, power station waste and other furnace ash has largely been produced outside of the area. Small amounts of red shale occasionally enter the market, such as a quantity from Sharlston, Wakefield in 2008.

Unburned spoil from Prince of Wales Colliery has been used as bulk fill but this is not viewed as an aggregate

4.2.4. Prince of Wales Colliery spoil tip site and some other unrestored sites within Wakefield represent a potential source of supply of secondary aggregate. However the viability of exploiting this source is not currently apparent, potentially due to a lack of demand in terms of large civil contracts requiring significant quantities of bulk fill. Market interest in colliery spoil exploitation may be more likely to be shown in the current spoil tip locations in nearby North Yorkshire associated with the now closed Kellingley colliery.

4.2.5. Paragraph 204(b) of the July 2018 version of the National Planning Policy Framework (NPPF) advises planning authorities to, so far as practicable, take account of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials, before considering extraction of primary materials, whilst aiming to source minerals supplies indigenously. NPPF paragraph 207 confirms that Local Aggregates Assessments should be based upon an assessment of all supply options (including marine dredged, secondary and recycled sources). WRAP defines recycled and secondary Aggregates (RSA) as follows:

4.2.6. Recycled Aggregates: derived from reprocessing materials previously used in construction. Examples include recycled concrete from construction and demolition waste material and railway ballast.

4.2.7. Secondary Aggregates: usually by-products of other industrial processes not previously used in construction. Secondary aggregates can be further sub-divided into manufactured and natural, depending on their source. Examples of manufactured secondary aggregates are pulverised fuel ash (PFA) and metallurgical slags. Natural secondary aggregates include china clay sand and slate aggregate (neither of these are produced in the region). RSA can include the following materials:

FIG10 – Types of Recycled and Secondary Aggregate

Recycled	Secondary	
	Manufactured	Natural
Recycled aggregate (RA)	Blast furnace slag	Slate aggregate
Recycled concrete aggregate (RCA)	Steel slag	China clay sand
Recycled asphalt	Pulverized-fuel ash (PFA)	Colliery spoil
Recycled asphalt planings (RAP)	Incinerator bottom ash (IBA)	
Spent rail ballast	Furnace bottom ash (FBA)	
	Used foundry sand	
	Spent oil shale	
	Recycled glass	
	Recycled plastic	
	Recycled tyres	

Source: WRAP, 2013, Available online at: http://aggregain.wrap.org.uk/more_information.html

4.2.8. Recycled Aggregate is primarily produced from construction, demolition and excavation (C,D&E) waste. The Environment Agency Data Interrogator 2015 shows a total of 2,051,695 tonnes of CD&E waste deposited at permitted waste management sites and originating in West Yorkshire consisting of 571,145 tonnes of construction & demolition waste and 1,480,248 tonnes of excavation waste.

4.2.9. Most CD&E waste originating from West Yorkshire is managed within West Yorkshire whilst the only significant "exports" were to adjacent authorities within the Yorkshire and Humberside region. Exported CD&E waste accounted for less than 10% of estimated arisings and 92% of these exports remained within the Yorkshire and Humberside region.

4.2.10. Whilst over 90% of CD&E waste is managed within the sub region there is a significant transfer of this waste between the individual West Yorkshire Authorities due to the location of landfill and processing plants within different authorities. Table 15 below therefore distributes the arisings of CD&E waste by population distribution. This table and the associated pie charts have been extracted from the draft West Yorkshire Combined Authority Waste Needs Assessment Capacity Gap.

TAB 15 – Estimated CD&E arisings for West Yorkshire distributed by population (tonnes)

Authority	C&D Landfill	C&D Recycling	Excavation Landfill	Excavation Recycling
Bradford City	**26,162**	**106,868**	**287,669**	**56,928**
Calderdale	10,265	41,929	112,864	22,335
Kirklees	21,392	87,382	235,215	46,548
Leeds	38,125	155,735	419,207	82,958
Wakefield	16,439	67,150	180,754	35,770
Totals	**112,384**	**459,063**	**1,235,709**	**244,539**
WYCA	**Total C&D Arisings 571,447**		**Total Excavation Arisings 1,480,248**	

4.2.11. The figures set out in table 15 do not represent the total quantity of construction and demolition wastes produced in West Yorkshire, but rather the total quantities of such waste received at permitted facilities – i.e. sites where there is a permit in place issued by the Environment Agency. The figures therefore neither confirm the total quantity of the potential RSA resource within West Yorkshire nor the proportion of this resource which is actually used as RSA.

4.2.12. To attempt to understand better the fate of construction and demolition wastes treated within West Yorkshire table TAB16 and FIG 11 and 12 below break down the figures into the type of facility where the waste was received. As can be seen 80% of the recorded construction and demolition waste was recycled, the majority of which will have been used to produce Recycled Aggregate. The reverse is true in relation to excavation waste, with over 80% of this material consigned to landfill.

TAB16 – Management of Construction and Demolition Waste W Yorks 2015

Facility Type	Tonnes Received	% of Total
C&D Landfill	112,384	20%
C&D Recycling	459,063	80%
C&D Total	**571,447**	
Excavation Landfill	1,235,709	83%
Excavation Recycling	244,539	17%
Excavation Waste Total	**1,480,248**	

FIG11 – C&D arisings for West Yorkshire by management route (2015)

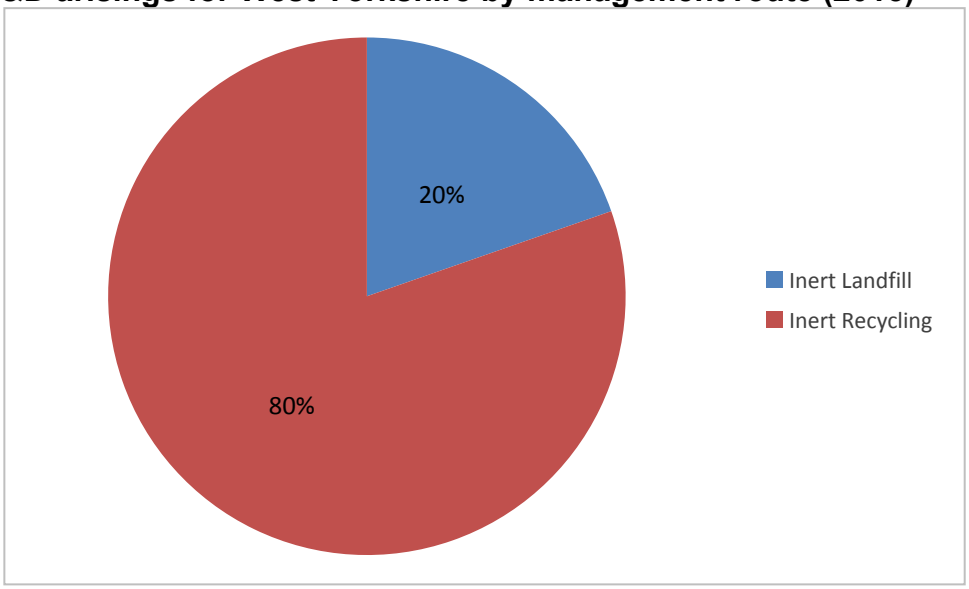
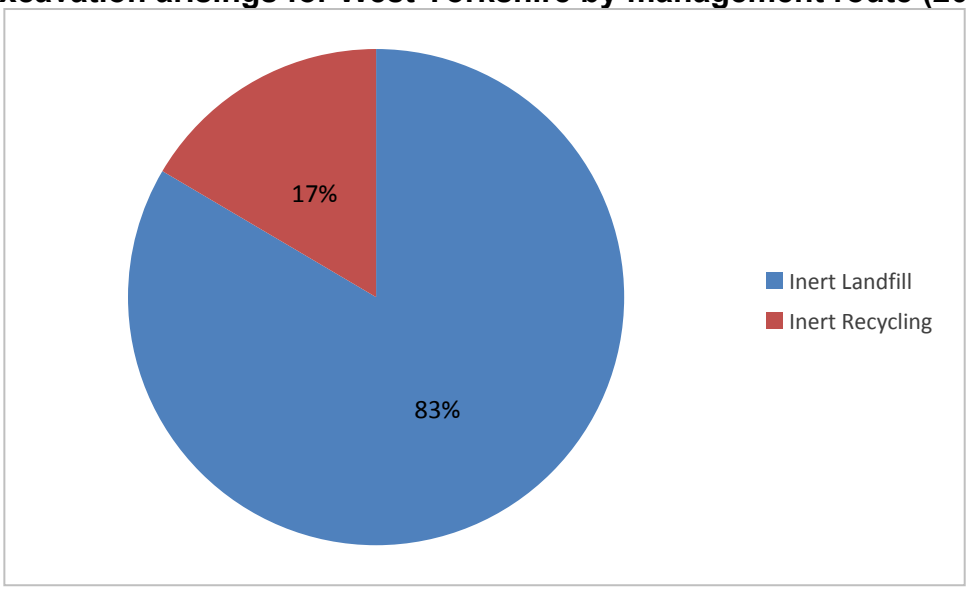


FIG12 – Excavation arisings for West Yorkshire by management route (2015)



4.2.13. Various studies have been carried out in an attempt to understand the quantity of waste with the potential to produce RSA which is generated and

the proportion of this waste which is currently being recycled/ reused as RSA.

4.2.14. The most up-to-date authoritative study which broke down figures to a sub-regional level is the government commissioned Survey of Arisings and Use of Alternatives to Primary Aggregates in England, 2005. This study estimated that 3,463,198 tonnes of construction, demolition and excavation (CDEW) waste was generated within West Yorkshire in 2005 of which 1,807,458 tonnes (52%) was used to produce recycled aggregates, see table 17 below:

TAB17 – Regional Estimate of CDEW Arisings

Table A11.7: Regional estimates of CDEW recycled by crushers and/or screens, used/disposed of at landfills, and spread on Paragraph 9A(1) and 19A(2) registered exempt sites in 2005 (tonnes)

English Region and Sub-Region	Yorkshire & the Humber: West Yorkshire
Adjusted estimate of population of recycling crushers	30
Estimated production of recycled graded aggregate (tonnes)	1,235,946
Estimated production of recycled ungraded aggregate (tonnes)	571,512
Estimated production of recycled soil (excl. topsoil) (tonnes)	234,408

Estimated tonnage of unprocessed CDEW entering licensed landfills, and its use / fate

	Engineering	Capping	Waste	Total
Clean hard C&D waste	53,386	0	60,714	114,100
Contaminated hard C&D waste	300	0	2,802	3,102
Clean excavation waste	96,087	284,691	327,784	708,562
Contaminated excavation waste	28,191	0	92,545	120,736
Clean 'mixed' CDEW	13,271	661	116,204	130,137
Contaminated 'mixed' CDEW	48	0	16,718	16,766
Other	91,529	0	46,577	138,106
Total	**282,812**	**285,353**	**663,344**	**1,231,508**
Estimated weight of waste materials (mainly excavation waste) used on Paragraph 9A(1) and 19A(2) registered exempt sites (tonnes)				189,824
Total estimated arisings of CDEW in 2005 (tonnes)				**3,463,198**

Source: CLG, 2007. Survey of Arisings and Use of Alternatives to Primary Aggregates in England, 2005

4.2.15. Additionally the 2005 survey estimated that 420,000 tonnes of pulverised fuel ash, 90,000 tonnes of furnace bottom ash, 30,000 tonnes of incinerator bottom ash, and 50,000 tonnes of glass container waste were generated within West Yorkshire in 2005; a total of an additional 590,000 tonnes of potential secondary aggregate material of which it was estimated that 150,000 tonnes was actually used to produce aggregates.

4.2.16. A more recent study, Construction, demolition and excavation waste arisings, use and disposal for England 2008, was undertaken by WRAP to assess the extent to which Construction and Demolition Waste Arisings had changed between 2005 and 2008. The study found that arisings of inert CDEW had fallen by 7% over the 3 year period but that the proportion of this material which was used to produce aggregates had increased nationally from 47% to 52%, see table 18 overleaf:

TAB18 – Comparison of 2005 & 2008 CDEW Data

	2005	2008	Change
'Hard inert' CDEW generating recycled aggregate	42.07	43.52	+3%
Inert CDEW recovered as recycled soils	4.36	9.21	+111%
Waste (mainly excavation waste) spread on exempt sites	15.44	10.98	-29%
Mainly inert CDEW beneficially used for landfill engineering / capping	9.61	10.60	-47%
Mainly inert CDEW beneficially used to restore former quarries	10.24		
Other largely inert CDEW deposited at landfills as waste	7.90	8.93	+13%
Sub-total (largely inert CDEW)	89.63	83.24	-7%
of which deposited at permitted landfills	27.75	19.53	-30%
Non-inert CDEW deposited at permitted landfills as waste	Not estimated	2.87	n/a
Non-inert CDEW sent for external recovery	Not estimated	0.82	n/a
Total (all lines)	n/a	86.93	n/a

Source: WRAP, 2010. Construction, demolition and excavation waste arisings, use and disposal for England 2008

4.2.17. If the changes to the national figures found in the WRAP 2008 report are applied to the West Yorkshire figures from the CLG 2005 report we can crudely estimate the West Yorkshire figures for 2008 as being 2,011,682 tonnes of RSA produced from a potential waste resource of approximately 3,810,774 tonnes.

TAB19 – West Yorkshire Estimate of CDEW Arisings 2005 & 2008

	2005	2008
Arisings of Inert CDEW	3,463,198 t	3,220,774 t
Quantity of RA Produced from Inert CDEW	1,807,458 t	1,861,682 t
Quantity of Potential Secondary Aggregate Material	590,000 t	
Quantity of SA Produced from Secondary Aggregate Material	150,000 t	
Total Potential RSA Making Resource	4,053,198 t	3,810,774 t
Total RSA Produced	1,957,458 t (48%)	2,011,682 t (53%)

4.2.18. In recent years RSA producers have been included in the annual aggregate survey in order to gain a more accurate understanding of RSA production in West Yorkshire. Upon the basis of returns from this survey, combined with estimates where appropriate, the figures set out in table TAB20 below can be derived. Please note that the figures for Wakefield and Kirklees are estimates based upon population distribution, as both authorities have indicated that they have no reliable data in relation RSA production.

TAB20 – West Yorkshire Local Authority Estimates of RSA Production

	2017 Reported Sales (Million Tonnes)	Population	Population Proportion	2017 RSA Sales Including Estimates (Million Tonnes)
Leeds	0.29	785,000	34%	0.29
Bradford	0.28	535,000	23%	0.28
Kirklees		437,000	19%	0.19
Wakefield		341,000	15%	0.15
Calderdale	0.09	209,000	9%	0.09
Total	**0.66**	**2,307,000**	**100%**	**1.00**

4.2.19. The approximately 1 million tonnes of RSA estimated to have been produced in West Yorkshire in 2017 represents an increase of approximately 100,000 tonnes from the output reported in the WYLAA 2017. However this difference is likely to largely relate to the inclusion this year of an estimated figure for Kirklees. This estimated figure has been included because Kirklees Council have clarified that the non-reporting of an RSA figure for Kirklees is due to a lack of data rather than an assessment that no RSA is produced in Kirklees.

4.2.20. The estimates for both Kirklees and Wakefield are based upon a methodology which utilises population statistics to derive an estimated total for West Yorkshire and to apportion a proportionate amount of this total to both districts. The figures for Leeds, Wakefield and Bradford are based upon survey returns supplemented by site estimates, where appropriate. Given the level of estimation which has been used to arrive at the data included in TAB20 this data is considered to possess a relatively wide margin for error. It should also be born in mind that the quality and characteristics of RSA varies widely.

4.2.21. Some higher quality recycled aggregate products are now emerging, for example crushed concrete only, which can be re-incorporated as a percentage of new ready mix concrete. Similarly some highway planings are being reincorporated into new asphalt. One operator now claims a blend of recycled aggregate equivalent to carboniferous limestone hard core which can be successfully used in areas of paving and some load bearing reinstatements. It is likely to remain the case that a high proportion of the RSA aggregate produced is not suitable for high specification uses.

4.2.22. The national and regional guidelines for aggregates provision in England 2005-2020 made an assumption that 133 million tonnes of the total of 431 million tonnes of construction aggregates which would be needed in the Yorkshire and Humber Region between 2005 and 2020 would be made up by RSA (31%). Based on these figures the estimated annual level of RSA production in West Yorkshire in 2017 (1,000,000 tonnes) makes up approximately 12% of the total estimated 8,312,500 tonne annual need for RSA in the Yorkshire and Humber Region.

4.2.23. In terms of the safeguarding of resources it should be noted that the Leeds Natural Resources and Waste Local Plan safeguards all but one recycled aggregate site within the District. The plan also allocates a large new site to compensate for the eventual loss of a non-safeguarded site.

4.2.24. The emerging Bradford Waste Management DPD also safeguards aggregate recycling sites under draft policy WDM3, as does the emerging Calderdale Local Plan under draft policy WA3 and the submitted Kirklees Local Plan under draft policy PLP 45. The adopted Wakefield Local Development Framework does not safeguard aggregate recycling facilities.

4.3. Mineral use in aggregate

4.3.1. Although aggregate minerals are used in a way which changes little between one year and the next, evolution of use nevertheless does take place. An example of this can be seen in the way that recycled aggregate had made an appreciable inroad into the sales of low quality virgin aggregate. Product refinement has also begun to allow recycled aggregates to be substituted for a limited proportion of higher quality virgin aggregates in ready mix concrete and asphalt.

4.3.2. Furthermore, in concrete making, the gravel component can be replaced by crushed rock but this requires a greater proportion of cement to be used in the mix. Sand for asphalt differs from sand for concrete. Currently good concreting sand is not over abundant, so that some effort is being expended by the industry in making a sand from limestone grit or from crushed sandstone. It is also known that marine sand makes an excellent concreting sand and, moreover, can reduce the quantity of cement needed to make concrete of the same performance.

4.3.3. Many of these alternatives are technically comparable but production and transport costs vary greatly depending on which source is used. Where traditional locally sourced sand and gravel has been freely available it has generally been the preferred aggregate specified by industry and customers. Nevertheless, if traditional locally sources are not available, then these alternates are viable.

4.3.4. Nonetheless, the relative increase in crushed rock aggregate consumption in West Yorkshire, and commensurate decrease in Sand and Gravel consumption, between 2009 and 2014 indicated by recent BGS data appears to support the suggestion that substitution of sand and gravel for crushed rock in concrete making may be increasingly taking place.

4.3.5. Crushed Dolomitic Limestone is one of the key aggregates capable of being used in concrete manufacture. The recent report on The Quarrying of Magnesian Limestone for Aggregate in the Yorkshire and Humber Region (2017) produced by WYCA identifies that substantial reserves of Magnesian Limestones potentially suitable for concrete manufacture exist within North and South Yorkshire and Derbyshire.

4.3.6. It is recognised that Magnesian Limestone will only ever supply part of the construction aggregate market, with a significant proportion of the resource only suitable for lower specification uses. However the importance of this resource as a potential substitute concreting aggregate should not be overlooked. Further exploitation of this resource may comprise part of the strategy to compensate for anticipated constraints on the supply of other land won aggregates, such as sand and gravel, in the future.

4.4. Potential Role of Marine Aggregate (Sand and Gravel)

4.4.1. The part of the North Sea situated adjacent to the Yorkshire and Humber coast is known to contain hundreds of millions of tonnes of good quality sand and gravel, which is of a higher quality than most of the indigenous sand and gravel in West Yorkshire. Marine aggregate is substitutable for land won sand and gravel and marine coarse sand is known to be a desirable product for concreting.

4.4.2. There are 7 production licences, operated by CEMEX UK Marine Ltd, Hanson Aggregates Marine Ltd, Tarmac Marine Ltd, Van Oord UK Ltd and Westminster Gravels Ltd for both sand and gravel, in the Humber marine region. The number of production licences has increased from 3 noted in previous WY LAAs.

4.4.3. Within the Humber Dredging Area During 2017, 1.88 million tonnes of primary aggregate was dredged from a permitted licensed tonnage of 4.40 million tonnes. In addition 0.5 million tonnes were dredged for beach nourishment. However, despite the availability of this high quality resource, there is no evidence that any significant quantities of marine aggregate currently enter the West Yorkshire market.

4.4.4. Indeed a relatively low quantity of marine dredged aggregate enters the Regional market; however statistics do show an upward trend in Humber landings from 2015 to 2017. The Marine Aggregates Crown Estate Licences summary of statistics 2017 indicates that in 2016 approximately 154,159 tonnes of marine aggregate extracted from crown estate licensed areas was landed at wharves on the River Humber, representing a sustained increase from previous years.

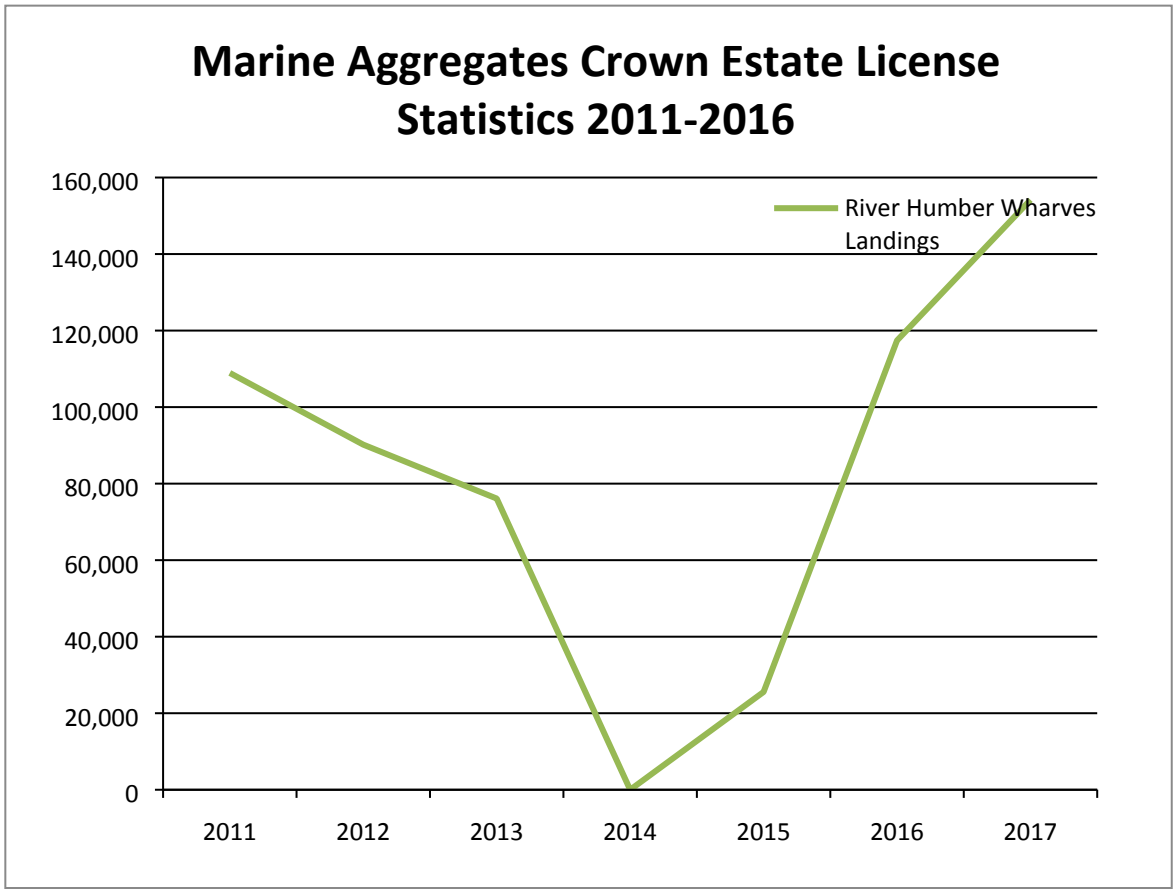
4.4.5. In addition 37,406 tonnes were landed at Blyth, 297,387 were landed at wharves on the River Tees and 296,624 tonnes were landed at wharves on the Tyne[4]. The industry has confirmed that currently they consider licenced extraction areas to be under-utilised.

4.4.6. Minerals Planning Officers from East Yorkshire have indicated that the significant increase in landings in 2016 and 2017 compared to 2015 is likely to be due to a temporary disruption to landing facilities at the Humber Docks during 2014/ 2015, with the 2016 and 2017 figures returning to a more normal level. This contention tallies with the long term data trend as shown by the table and chart below, however an upwards trend does seem to discernible:

TAB21 – River Humber Landings Stats

Marine Aggregates Crown Estate License Statistics 2011-2016							
***Figures in tonnes**	**2011**	**2012**	**2013**	**2014**	**2015**	**2016**	**2017**
River Humber Wharves Landings	108,927	90,194	76,102	0	25,561	117,417	154,159

FIG13 – River Humber Landings Trend



[4] Statistics obtained from Marine Aggregates The Crown Estate Licenses Summary of Statistics 2017.

4.4.7. In 2013 all Mineral Planning Authorities within the Yorkshire and Humber Region and the Crown Estate funded and commissioned a marine aggregate study. The purpose of the study was to establish the reasons why so little marine sand and gravel is utilised in the Region and to establish the barriers to its much greater use. The study was published in February 2014.

4.4.8. The study explains that the cost of transportation from the Humber to the large markets of West and South Yorkshire are currently not competitive with the price of land won aggregate hauled from Nottinghamshire and North Yorkshire into the conurbation. It suggests the gap is not very large and will narrow in the period from 2020 onwards as land based extraction becomes more costly to sustain.

4.4.9. However there is a lack of infrastructure for landing the aggregate and transferring it for transport to the conurbation. The report indicates that as the cost gap narrows further there will need to be investment in wharves, sidings, trains and barges to facilitate large scale transfer of aggregate westward from the Humber. Nonetheless, in the shorter term (the next 5 years), it is possible that small scale transfer by canal barge may begin using existing facilities and equipment.

4.4.10. It is understood that the industry are in the initial stages of looking to develop marine aggregate supply into West Yorkshire and adjacent areas via the Humber river. With options for wharf sites with rail-heads in either Grimsby, Immingham, Hull or Goole.

4.4.11. Partially in recognition of the strategic importance of marine aggregates and associated transportation infrastructure, Leeds City Council have safeguarded potential and existing aggregate wharves through their Local Plan. The policies provide protection for existing railway sidings and canal wharves for freight use and also allocate a new wharf site and a new rail siding site. The rail siding site is specifically for minerals freight. Similarly draft policy PLP 39 of the submitted Kirklees Local Plan seeks to protect strategic minerals infrastructure within Kirklees including several railway sidings and a wharf on the Calder and Hebble Navigation formerly used to offload coal for the former Thornhill Power Station.

4.4.12. An application for the development of a new aggregate wharf at Haigh Park Road, Sourton, was approved by Leeds City Council on 02 April 2015. This new wharf is expected to distribute approximately 2,000 tonnes per week of aggregate (sand and gravel) arriving from the Humber Ports. However Leeds City Council have report concerns over the further development of rail siding and wharf infrastructure suitable for the handling of aggregates, reporting that the following issues are likely to preclude the importation of aggregate, particularly marine aggregate, by rail and canal into Leeds:

i. The dominance of major aggregate operators is preventing independent operators from securing suitable sites for mineral or mineral-related

uses, i.e. particularly in respect of sites safeguarded in the Leeds adopted Development Plan for mineral-related rail freight use.

ii. The pressure to build residential property in Leeds (as we currently do not have a 5-year housing land supply) is resulting in residential planning permissions being approved that then may/will go on to constrain mineral activity, including sites in the Leeds adopted development plan that are safeguarded or allocated for mineral use/mineral freight use.

iii. That safeguarded wharf and rail sites in Leeds are lost to other development as land owners demonstrate that the sites are unlikely to be used for mineral freight purposes. Current uptake of the sites for minerals freight is low.

4.4.13. In order to further understand the potential barriers to efficiently distributing marine aggregates within the Region the Crown Estate has let a contract to ARUP to look in more detail at the logistics of marine aggregate transportation. This should better inform Local Authorities in terms of how to plan for and facilitate a potential future increase in the use of marine won aggregates within West Yorkshire and unlock the potential for this resource to compensate for the diminishing availability of land won concreting sand and gravel.

4.4.14. There have been recent positive moves forward in terms of the delivery of enhanced canal freight infrastructure to provide a marine transportation route between Leeds and the Humber with the Canal & River Trust confirming in July 2017 that they have been awarded a 1.7 million euro grant from the EU Interreg funding programme (north sea region) that will help them to deliver their Freight aspirations for the Aire & Calder and their proposed Inland Port of Leeds.

4.4.15. The funding is to deliver the Trust's 'Inland Waterway Transport Solutions' (IWTS) project. The primary aim of IWTS is to improve the infrastructure of smaller waterways to help them realise their potential. From a Trust's perspective, IWTS project will provide funding for a costed technical and engineering study of the Aire & Calder bottlenecks (primarily Bullholme Lock) with a view to increasing the size of ship that can sail the navigation, and subsequently the amount of freight that can be carried. Other ancillary items will also be financed through the project that will help to deliver freight aspirations for the Aire & Calder.

4.5. Potential for Improved Aggregate Rail Freight Connections

4.5.1. The availability of infrastructure to allow aggregate to be effectively transported and distributed by rail, including the provision of adequate off-loading facilities, is a particularly significant issue for West Yorkshire. This is for four principle reasons:

(1) West Yorkshire is reliant upon aggregates transported from outside of the sub-region, an increasing proportion of which is likely to be distributed by rail in the future, particular in relation to quarries located within the Yorkshire Dales National Park;

(2) Existing rail off-loading facilities at Cross Green in Leeds are limited and are likely to be disrupted by the construction of HS2;

(3) Poor Air Quality is a particular problem for West Yorkshire, as described in the West Yorkshire Low Emissions Strategy and the Transport Strategy 2040. Road haulage of freight, including aggregates, makes a disproportionate contribution to air pollution, enhancement of rail infrastructure may facilitate a transition towards an increasing proportion of aggregates being transported by rail freight, with consequent air quality benefits; and

(4) Marine aggregates may provide for an increasing proportion of the sand and gravel consumed in West Yorkshire in the future, with increasing constraints on the availability of land-won sand and gravel from North Yorkshire. The Humber Docks are rail connected and the provision of adequate infrastructure to allow marine aggregates from the Humber Docks to be transport to, and off-loaded within, West Yorkshire by rail, alongside potential barge transportation options, may help to facilitate a sustainable shift to this potential new aggregate supply source.

4.5.2. In terms of the importance of rail to the current minerals supply flows into West Yorkshire it should be noted that aggregates from the Yorkshire Dales National Park (YDNP) provide for a very significant proportion of West Yorkshire's aggregate consumption, particularly in terms of high specification aggregates. A number of the quarries within the YDNP are now rail connected and the YDNP Local Plan is seeking a minimum of a 50% reduction in the road haulage of quarry products and is consequently imposing increasingly tight restrictions on quarry HGV movements. The aggregate transported by rail from quarries in the Yorkshire Dales is currently primarily offloaded at the rail aggregate depots at Cross Green in Leeds from where it is processed and transported to consumers within the relevant market area via HGV.

4.5.3. Aggregate is transported into Leeds by rail from Swinden Quarry, and also from Ingleton Quarry, via Ribblehead. Additionally Acrow and Dry Rigg Quarries were reconnected to the Settle-Carlise railway line in late 2015/ early 2016. This reconnection took place as part of a £6 million scheme funded by Tarmac Holdings Ltd (the operator of the quarries and one of the aggregate depots at Cross Green). The project essentially involved the construction of a 750 yards stretch of new railway ending in a fan siding at Acrow Quarry. At the time of opening it was estimated that the new rail link would allow approximately 16,000 aggregate lorry loads per year to be transported by rail, i.e. between 100,000 and 200,000 tonnes of aggregate[5].

4.5.4. As part of the consultation on the WYLAA 2017 the Yorkshire Dales National Park Authority made representation raising concerns about the limitations of the existing aggregate rail connections between Yorkshire Dales quarries and West Yorkshire. In particular they highlighted the shortcomings of the current infrastructure, with off-loading/ distribution

[5] RailEngineer, 5th January 2017, Rail News Report, *Get Connected.*

depots only available at Cross Green (Leeds). Having limited off-loading points restricts the potential for aggregate transported by rail from the Yorkshire Dales to be sustainably distributed to all of West Yorkshire.

4.5.5. The Yorkshire Dales National Park Authority contend that the current restricted aggregate off-loading facilities available to quarry operators in the Yorkshire Dales limits the potential for increased rail haulage of minerals. Additionally recent discussions between the West Yorkshire Combined Authority and quarrying industry representatives indicate that, if adequate rail off-loading facilities are not provided within West Yorkshire, the consequence may be that aggregates which would otherwise be supplied into West Yorkshire would be transported further on to the south side of the West Yorkshire area bordering South Yorkshire and also potentially slightly further afield to serve the M1/A1/M18 and Sheffield road networks, in-effect by-passing West Yorkshire.

4.5.6. Figure 14 below illustrates the approximate area which may benefit from the additional rail depot.

FIG14 – Rail Link Between West Yorkshire and the Yorkshire Dales

Source: Base Map from Google Maps 2017

4.5.7. The deliverability of providing a new aggregate rail depot within West Yorkshire would depend upon both suitable land being available in an appropriate location and also either private or public sector investment being available to construct and operate the facility. The land use planning system can play its role through either safeguarding potentially suitable land or allocating sites for development.

4.5.8. It is recommended that further research is undertaken to understand (a) the potential scale of benefit which developing an addition aggregate rail offloading facility in West Yorkshire would bring about (b) the availability of potentially suitable sites for an aggregate rail depot and (c) the commercial viability of developing such a facility. If this further research indicates that the development of such a facility would be viable then opportunities for safeguarding or allocating the land which would be required to develop a new aggregate rail off-loading facility should be considered within relevant Development Plans, including the Bradford Allocations Development Plan Document and the current review of Leeds' Local Plan documents.

4.6. Factors Which May Influence Future Demand

4.6.1. A key element of an LAA is the consideration of whether there are any known factors which may affect future demand for minerals. Such factors can include population growth, economic trends or significant infrastructure projects.

4.6.2. In considering future changes in aggregate provision it should be borne in mind that total Yorkshire and Humber aggregate sales, at approximately 3.09 million tonnes of sand and gravel and 11.2 million tonnes of crushed rock aggregates in 2016, represent only 66% and 88% of the figure calculated by the government to be necessary to maintain adequate aggregate supplies in 2009 in their 2005-2020 aggregate provision guidelines. Therefore it could be argued that current aggregate production levels fall significantly below the levels likely to be required to adequately meet demand, irrespective of any potential future changes in demand.

4.6.3. The approach taken in the first West Yorkshire LAA was to recognise that a number of factors may affect future demand but to revert to the 10 year average sales method of land bank calculation, given the acknowledged difficulties associated with attempting to predict future changes in demand with any degree of accuracy. However a commitment was made to reviewing this position during the preparation of subsequent LAAs and taking advantage of any evidence which becomes available in the future to adjust the landbank aggregate apportionment figure to take account of likely future changes in demand.

4.6.4. During the process of preparing the 2014 LAA it was identified that North Yorkshire County Council had undertaken substantial demand forecasting work as part of the preparation work for their Local Plan and future LAAs. This work was set out in their July 2014 discussion paper Forecasting demand for aggregate minerals and was a incorporated into the North Yorkshire Sub-region LAA (NYLAA) First Review, February 2015. The methodology included in the demand forecasting discussion paper was updated and revised prior to incorporation in the NYLAA first review and has been further revised through and the Second Review July 2016 paper

which was ratified by the Yorkshire and Humber AWP on 28 September 2016 and a recently published third review document.

4.6.5. The North Yorkshire approach, whilst recognising the difficulties and uncertainties associated with forecasting aggregate demand, suggested a forecasting methodology based on linking future demand to the predicted rate of change of future house building across the main market areas served by North Yorkshire (including West Yorkshire). Further adjustments were then made to take account of changing aggregate supply patterns (supply constraints in West and South Yorkshire).

4.6.6. This forecasting method is based upon a comparison of 10 year average historic house completions with the target future house building rates set out in relevant Local Development Plans. The figure arrived at within the NYLAA First Review document was that a 53% uplift in house building would be required to meet planned housing provision levels within the market area for minerals extracted from the North Yorkshire sub-region.

4.6.7. The potential for one-off infrastructure projects to increase aggregate demand was also considered but the NYLAA first review assesses that there is no strong basis for concluding that aggregate demand associated with infrastructure projects is likely to increase significantly over and above historic average levels.

4.6.8. For the purposes of deriving figures which are specifically relevant to West Yorkshire, a similar exercise has been undertaken as part of the West Yorkshire Local Aggregates Assessment 2018, comparing 10 year average historic house completions with the target future house building rate set out in relevant Development Plans for Bradford, Leeds, Calderdale, Wakefield and Kirklees. These data have been taken from the net housing completion data published by the government and emerging or adopted Local Plan Documents for the relevant Local Authorities. The results of this comparison are set out in tables 22 and 23 below, and illustrated in Figures 15, 16 and 17:

TAB22 – Planned Housing Delivery in West Yorkshire

District	Document	Stage	Date of Document	Planned Housing Delivery	Plan Period	Plan Years	Annual Housing Delivery Target
Leeds	Core Strategy Selective Review	Draft	Jul-18	54,352	2017 to 2033	16	3,397
Bradford	Core Strategy	Adopted	Jul-17	42,100	2013 to 2030	17	2,476
Kirklees	Local Plan	Draft	Nov-16	31,140	2013 to 2031	18	1,730
Wakefield	Local Plan	Draft	Oct-17	28,000	2021 to 2036	20	1,400
Calderdale	Publication Draft Local Plan	Draft	Jun-18	12,600	2018 to 2033	15	840

TAB23 – Comparison of Housing Targets vs. Completions

	Planned Annual Housing Requirement	2007-16 Average Housing Completions	Uplift Required	% Uplift Required
Leeds	3,397	2,230	1,167	52%
Bradford	2,476	1,270	1,206	95%
Wakefield	1,400	1,150	250	22%
Kirklees	1,730	1,170	560	48%
Calderdale	840	540	300	56%
W Yorks Total	**9,843**	**6,360**	**3,483**	**55%**

FIG15 – 10 Year Housing Delivery Trend West Yorkshire

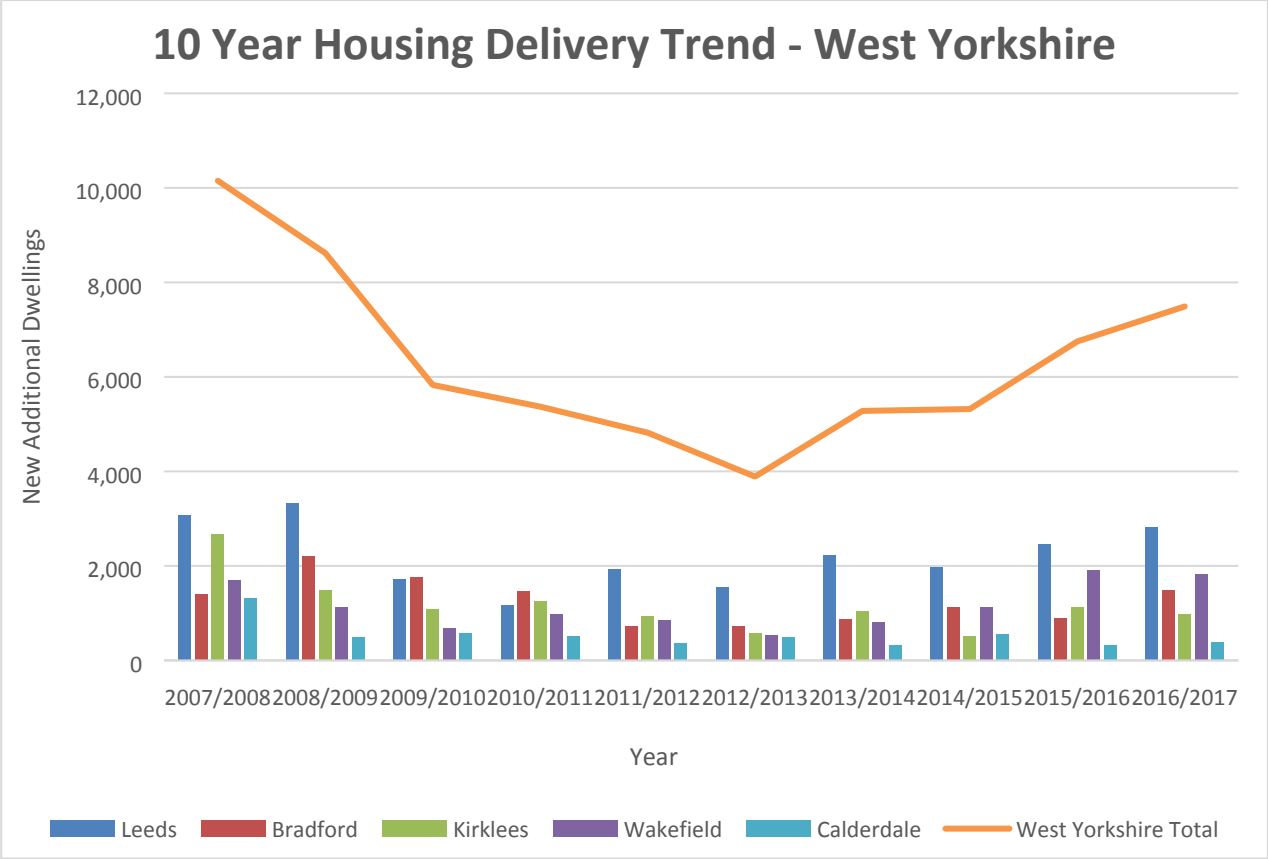


FIG16 – 10 Year Housing Delivery Trend vs. Planned Future Delivery Levels

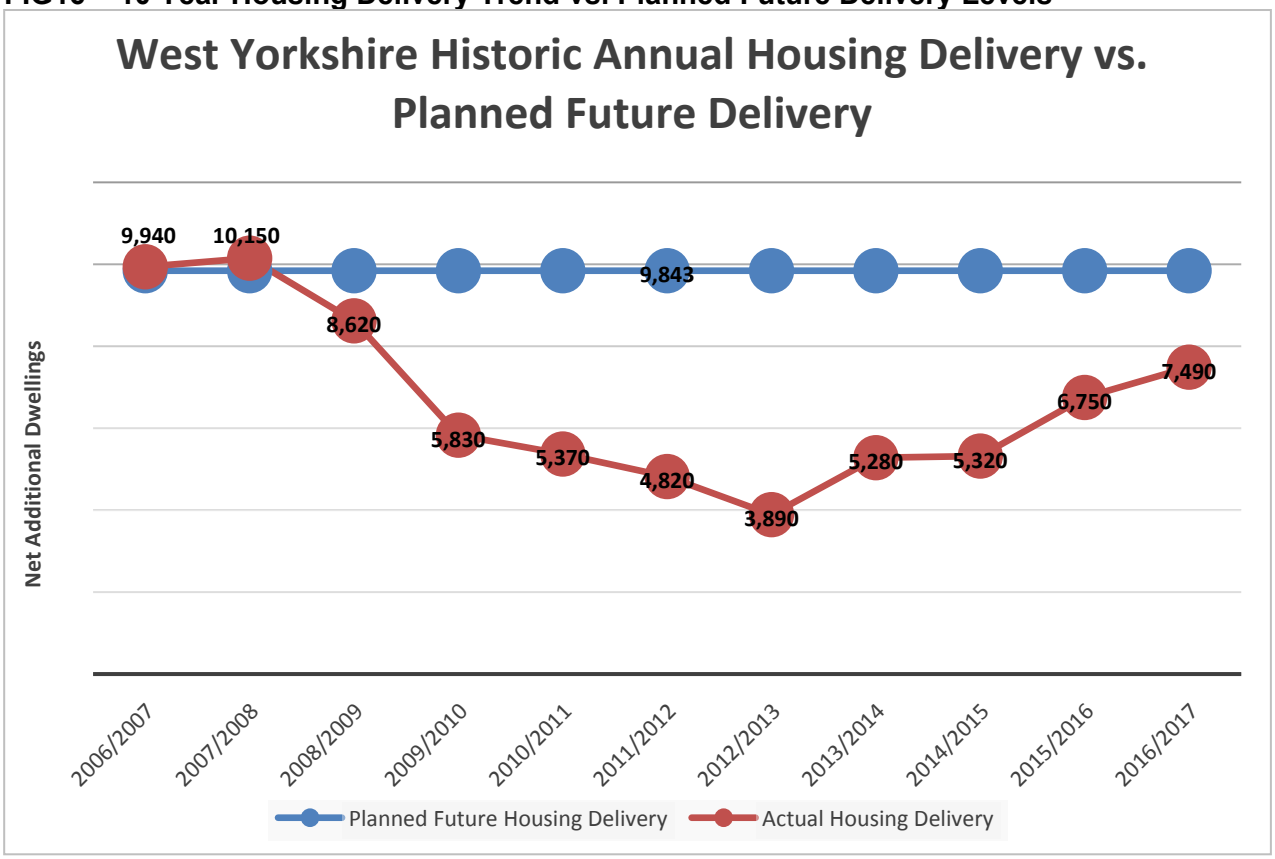
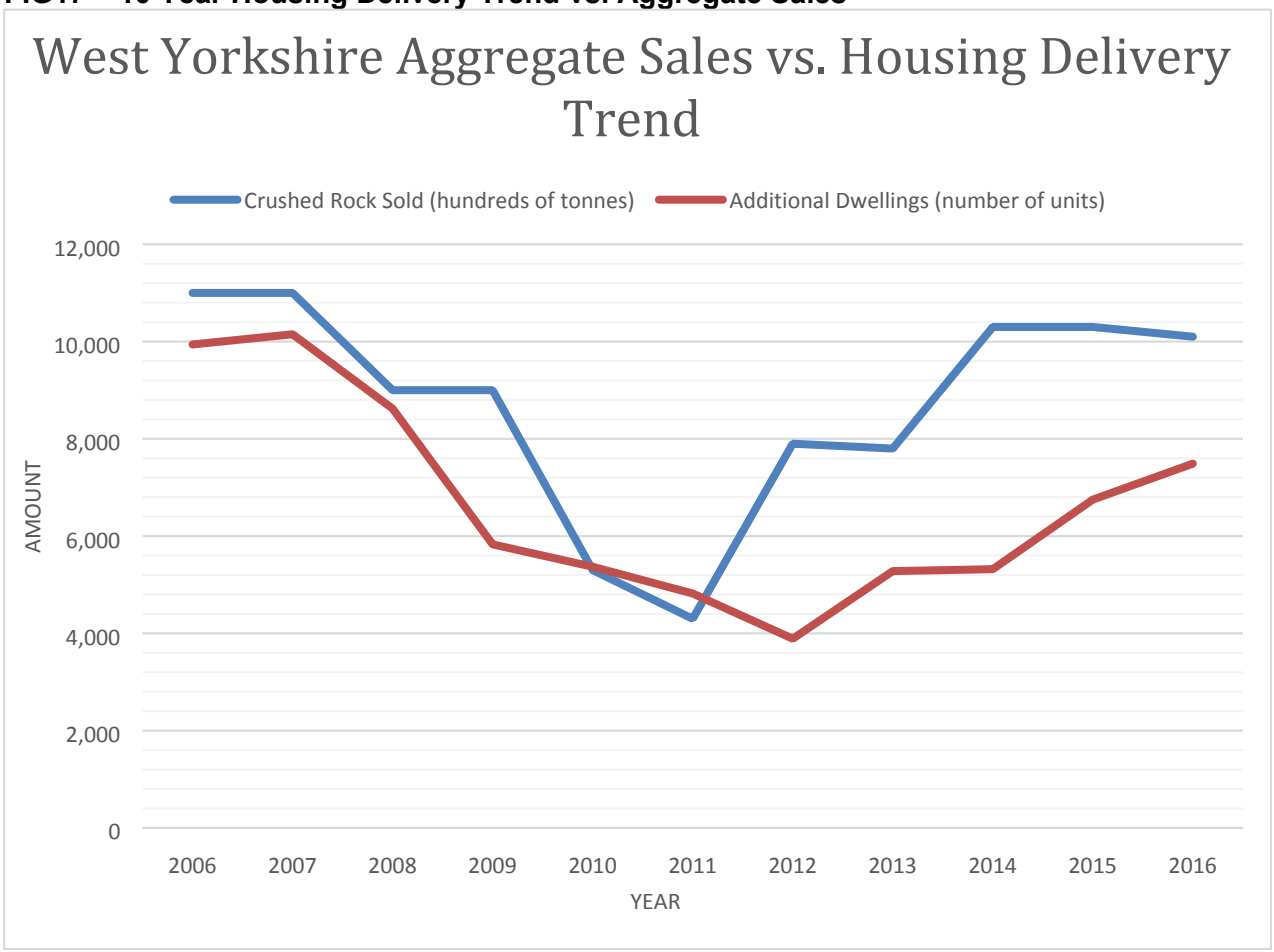


FIG17 – 10 Year Housing Delivery Trend vs. Aggregate Sales



***Note**: Please note that the net housing completion data included in Tab23 and relevant associated charts is data published by the government as part of their live tables on housing supply: net additional dwellings. Each of the West Yorkshire Local Authorities also publish their own housing completion figures, which may vary with the figures published by the government. The use of the government published housing completion figures in the LAA is to ensure consistency and for the specific purpose of calculating the uplift to be applied to the aggregate landbank. These figures should not be used for any other purpose and should not be seen as conflicting with or contradicting the different housing completion figures published by each of the West Yorkshire Local Authorities for planning and monitoring purposes.*

4.6.9. Notwithstanding the apparently clear association between aggregate sales and housing delivery shown in Figure 17 above, there has been some debate about the precise relationship between increased house building and increased demand for aggregates. North Yorkshire initially proposed an estimate of house building accounting for only 15% of aggregate demand. However the Minerals Products Association raised concerns in relation to this estimate and set out their view that it would be safer to link housing growth to 100% of demand.

4.6.10. The NYLAA First Review includes consideration of a range of approaches to link the housing uplift figure to aggregate demand. The outcome of this consideration is a proposed 25% uplift in relation to sand and gravel (assuming that approximately 50% of demand for sand and gravel is likely to be associated with house building).

4.6.11. In relation to crushed rock the NYLAA first Review indicates that industry representatives have expressed the view that there is more uncertainty about the future level of demand and its link to housing growth. The NYLAA First Review therefore adopts a more conservative approach of uplifting the crushed rock sales average by 16%.

4.6.12. The NYLAA draft second review document calculates future provision for sand and gravel at an overall annual rate equivalent to 2.44mt and an annual rate of 3.75mt for crushed rock for the period 2015 to 2030. These figures are around 28% and 17% higher respectively than those which would be derived using 10 year average sales (excluding sales of crushed rock from the YDNP).

4.6.13. For West Yorkshire it is acknowledged that demand for the generally lower specification aggregates produced within the sub-region relates minimally to the economic demand for the consumption of aggregates within West Yorkshire. This is particularly the case in relation to the need for concrete grade aggregates and roadstone as these materials are not produced in significant quantities within West Yorkshire.

4.6.14. Therefore the purpose of applying an uplift to sales averages is not to allow for the aggregates required to deliver planned housing growth to be provided for from within West Yorkshire. Instead the uplift should be seen as a mechanism to compensate for the increased pressure future housing and economic development within West Yorkshire will place upon minerals supplies derived from neighbouring authorities and to relieve pressure on neighbouring authorities to supply lower specification aggregates.

4.6.15. Furthermore it should be noted that the role that West Yorkshire plays in aggregate supply is dominated by crushed rock aggregates rather than sand and gravel. Therefore applying a lower uplift to the crushed rock aggregate apportionment, the approach taken in the NYLAA, would disproportionately diminish the implied overall target for increased aggregate production from West Yorkshire.

4.6.16. In this context it is considered appropriate to apply a less conservative method within the West Yorkshire LAA. Therefore the uplift approach adopted in the 2018 LAA, is to assume that the increase in aggregate production required to deliver planned housing growth would be approximately 50% of the required increase in house building in relation to both crushed rock and sand and gravel aggregates.

4.6.17. The West Yorkshire specific data set out in table 23 indicates that the increase in house building which would specifically be required for West Yorkshire to meet the housing requirements calculated within adopted and emerging Local Plans is 55%. On this basis it is considered appropriate to plan for a 27.5% uplift in aggregate supply within West Yorkshire to compensate for the increased demand house building growth in West Yorkshire will place upon aggregate supplies from neighbouring authorities.

4.6.18. Planning for a 27.5% increase in aggregate provision should also help West Yorkshire contribute to moving the Region closer to the aggregate provision figure set out in the 2005-2020 guidelines. Further details of the methodology used to calculate the uplift percentage can be found at Appendix 2 to this report.

5. SUMMARY AND CONCLUSIONS

5.1. The NPPF advises that a Local Aggregate Assessment should set an aggregate apportionment based on a rolling average of 10 years sales data and other relevant local information, and an assessment of all supply options. As set out in the main body of this report, the average historic annual sales of Sand and Gravel and Crushed Rock Aggregates from West Yorkshire is as follows:

TAB24 – Aggregate Historic Sales Average

Aggregate Type	Average Annual Tonnage
Sand and Gravel	90,000 (0.09mt)
Crushed Rock	850,000 (0.85mt)

5.2. Significant, mainly lower specification, reserves of crushed rock aggregate remain within West Yorkshire. However, as of 31 December 2017, only one active sand and gravel extraction site remains within West Yorkshire possessing relatively modest reserves. Based upon the aggregate provision figures for Yorkshire and the Humber set out in the government guidelines for the 2005-2020 period there appears to be a continuing under supply within both West Yorkshire the wider Region in relation to the quantity of aggregates which would be required to fully meet economic requirements.

5.3. It is possible that the need for virgin land won aggregate may be tempered by improved efficiency and economy of use, substitution with marine-won aggregates and by improved specifications for secondary and recycled aggregates leading to their greater market penetration. However it is not possible to state with any confidence at this stage that the demand for land won-aggregates is likely to diminish in the foreseeable future. If adequate local supplies of aggregate cannot be maintained material will have to be procured from wider national or global supply markets at a potentially increased cost to the economy and the environment.

5.4. The objective in setting an aggregate apportionment for West Yorkshire must exclude the possibility of meeting our own aggregate needs, but rather instead is intended to set a level of future provision for the lower quality aggregates which the sub-region is capable of producing which is sustainable and appropriate. This is because the quality of the primary aggregates produced within West Yorkshire generally cannot meet more demanding specifications such as those applied to concreting aggregate or roadstone.

5.5. In summary the other relevant local information which has been considered in preparing the Local Aggregates Assessment for West Yorkshire 2018 is as set out in Section 4 and summarised in Table 25 overleaf:

TAB25 – Summary of Other Data Relevant to Calculating Landbanks

Data Type	Annual Tonnage
Conjectured West Yorkshire Apportionment of Regional Guidelines for Aggregates Provision in England: 2005-2020 – West & South Yorkshire Sand and Gravel	**580,000**
Conjectured West Yorkshire Apportionment of Regional Guidelines for Aggregates Provision in England: 2005-2020 West Yorkshire Crushed Rock	**1,220,000**
Estimate of West Yorkshire Sand and Gravel Consumption set out in the 2014 aggregate minerals survey for England and Wales	**702,000**
Estimate of West Yorkshire Crushed Rock Consumption set out in the 2014 aggregate minerals survey for England and Wales	**2,536,000**
Estimate of Recycled & Secondary Aggregate Produced in West Yorkshire in 2017	**1,000,000**
Estimate of Land Won Sand and Gravel Imported to West Yorkshire from other Regions/ Sub-Regions in 2014	**685,000**
Estimate of Land Won Crushed Rock Imported to West Yorkshire from other Regions/ Sub-Regions in 2014	**1,997,000**
Estimated Proportion of West Yorkshire Sand and Gravel Consumption Met by Imports in 2014	**98%**
Estimated Proportion of West Yorkshire Crushed Rock Aggregate Consumption Met by Imports in 2014	**79%**
Estimated Increase in Aggregate Production Required for Deliver Planned Increases in Housing Delivery within West Yorkshire	**27.5%**

5.6. On the basis of the information discussed in Section 4 of this report, ten year sales averages alone are not considered to be adequate to use as the basis for calculating the aggregate landbank for West Yorkshire. This is both because of the depressing effect of the recession on the sales average for crushed rock aggregates and because the sales average figure does not allow for the increase in aggregate production which would be required to deliver the planned level of house building within West Yorkshire over the next 15 years (with a 55% increase in house building required to meet anticipated housing needs). A strong relationship is apparent between housing delivery and aggregate production, as illustrated by Figure 17.

5.7. It is concluded that applying a 27.5% uplift to historic sales averages arrives at an apportionment figure which embodies some aspiration for West Yorkshire to play its role in providing for projected increased future house building requirements whilst remaining realistic and proportionate to the constraints of the West Yorkshire aggregate resource.

5.8. The aggregate apportionments and landbank calculations set out in table 26 below are therefore proposed for the Local Aggregate Assessment for West Yorkshire 2018. It is acknowledged that apportionment for West Yorkshire remains low; however the significant contribution of West Yorkshire to the supply of Recycled and Secondary Aggregates assists in mitigating the reliance on adjacent major aggregate producing Regions.

TAB26 – West Yorkshire Aggregate Landbanks 2017

Note: All Figures in Tonnes Unless Otherwise Stated	**Reserve**	**Annual Sales Average 2007-2016**	**27.5% Uplifted Aggregate Apportionment**	**Landbank**
Sand and Gravel	670,000	90,000	110,000	**6 Years 1 Month**
Crushed Rock	38,780,000	850,000	1,080,000	**35 Years 11 Months**

5.9. The Sand and Gravel landbank of 6 Years and 1 Month is below the minimum landbank required by paragraph 207 of the National Planning Policy Framework (NPPF), indicating that the release of additional reserves is required. Sand and gravel reserves and extraction rates in West Yorkshire remain very low. The vast majority of the sand and gravel which is consumed within West Yorkshire is sourced from neighbouring mineral planning authorities, primarily North Yorkshire.

5.10. The crushed rock aggregate landbank of 35 Years and 11 Months is significantly greater than the 10 year minimum level required by the NPPF. However, as illustrated by the chart below, crushed rock reserves remain below pre-recession levels and should not therefore necessarily be seen as excessive or problematic, particularly in light of West Yorkshire's dependence upon neighbouring regions for the supply of higher specification crushed rock aggregates.

5.11. It should also be noted that the landbank length guidelines included within the NPPF are minimums not maximums. Mineral Planning Authorities, including West Yorkshire Authorities and those neighbouring authorities who supply significant quantities of aggregate into West Yorkshire, should also consider other relevant information when assessing the need for the release of additional aggregate reserves.

5.12. **Key Messages and relevant considerations** when assessing proposals and allocations for minerals development and associated infrastructure are:

i. **Additional aggregate supplies will be required-** Although housing delivery is generally significantly improving within West Yorkshire and household growth forecasts are general falling there remains a substantial gap between the number of houses being built and the objectively assessed need for new housing; additional aggregate supplies will be required if this gap is to be filled.

ii. **West Yorkshire currently makes a low contribution** to the overall supply of construction aggregates within the Yorkshire and Humber Region, particularly in relation to sand and gravel.

iii. **Sand and gravel** reserves and production remain at a **very low level** within West Yorkshire.

iv. **Release of new reserves is required**- The current landbank of sand and gravel reserves is at a level which indicates that the release of new reserves is required.

v. **Crushed rock reserves remain relatively high within West Yorkshire-** however a substantial proportion of the currently permitted reserves are **unsuitable for higher specification uses**, such as for the manufacture of concrete or as roadstone;

vi. **West Yorkshire remains reliant on neighbouring Mineral Planning Authorities-** primarily the administrative areas regulated by the Yorkshire Dales National Park Authority, North Yorkshire County Council and Doncaster Council, to meet the majority of its aggregate needs, particularly for uses which demand higher specifications.

vii. **West Yorkshire remains strongly reliant on the Yorkshire Dales National Park-** To meet its need for aggregate suitable for use as skid resistant road surfacing, West Yorkshire remains strongly reliant upon supplies of high specification (low Polished Stone Value) sandstone aggregates extracted from quarries located within the Yorkshire Dales National Park.

viii. **Sustainable opportunities to increase the supply in West Yorkshire**- Notwithstanding the extent of the crushed rock aggregate landbank, given West Yorkshire's reliance on adjoining authorities for higher specification aggregates, any sustainable opportunities to increase the supply of the generally lower specification aggregates produced within West Yorkshire should be considered upon their merits.

ix. **Increase Recycled Aggregates-** Providing new and enhanced facilities for the production of recycled aggregates will help to compensate for West Yorkshire's economic dependence upon primary aggregates quarried from neighbouring authorities.

x. **Building Sand from Sandstone Quarries-** Production of sand from crushed rock at sandstone quarries in West Yorkshire, including building stone quarries, is a valuable additional/ alternate source of sand supply, particularly building sand.

xi. **Safeguarding Rail and Wharves-** Existing rail and wharf infrastructure should be safeguarded and potential new locations for wharves and rail depots should be identified within West Yorkshire to facilitate the sustainable transportation of both land won and marine aggregates into West Yorkshire in the future, particularly crushed rock aggregates from the Yorkshire Dales and marine aggregates landed at the Humber Docks.

6. ROLE OF LOCALISM IN AGGREGATE SUPPLY

6.1. Background

6.1.1. The Localism Act and the National Planning Policy Framework (NPPF) places a duty on local planning authorities and other bodies to cooperate with each other to address strategic issues relevant to their areas. The duty requires continued constructive and active engagement on the preparation of development plan documents and other activities relating to the sustainable development and use of land, including minerals.

6.1.2. Paragraph 37 of the NPPF confirms that Local Plans will only be considered to be effective if they are *based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground*. This LAA document will help demonstrate the joint working taking place between authorities and will accompany the submission of local plan documents.

6.1.3. The 'duty to cooperate' is set out in Section 110 of the Localism Act. This applies to all local planning authorities, national park authorities and county councils in England. The new duty relates to sustainable development or use of land that would have a significant impact on at least two local planning areas or on a planning matter that falls within the remit of a county council; It requires that councils:

- set out planning policies to address such issues;
- 'engage constructively, actively and on an ongoing basis' to develop strategic policies; and
- consider joint approaches to plan making.

6.1.4. Paragraphs 24 - 27 of the NPPF emphasise the importance of maintaining effective cooperation between Local Planning Authorities. The NPPF specifically stresses that, in particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.

6.2. Securing the Necessary Aggregate

6.2.1. Bradford, Calderdale, Kirklees, Leeds and Wakefield Councils [together with Yorkshire Dales National Park Authority, NYCC, Doncaster Council, East Riding and Humberside and Derbyshire and the Peak District] have a relationship in the supply and use of primary minerals.

6.2.2. The purpose of this statement is to set out how the Councils will proceed in liaison with the AWPs to ensure the development of a consistent and complementary policy approach towards minerals supply. The authorities will seek to corporate to the areas of joint or further work set out below.

1) The provision and sustainable use of aggregate minerals ensuring the sufficient supply of material to provide the infrastructure, buildings and goods required to sustain the economy and deliver planned growth.
2) Sharing advice and information (including aggregate monitoring information) to complement the preparation of aggregate assessments such as landbanks, locations of permitted reserves relative to the market, and capacity of reserves.
3) The Councils will continue to work together in the future to prepare joint or individual local aggregates assessments and also co-operate in the production of wider regional aggregate assessments within their relevant aggregate working party areas.
4) The Councils will share information as soon as available, including draft local plan consultation documents prior to the consultation taking place to allow early engagement.

6.3. Agreements to be Sought

6.3.1. Under the Duty to Corporate the West Yorkshire authorities should seek agreement with the Minerals Planning Authorities for the areas which are the main sources of the aggregates supplied into West Yorkshire, to ensure that these authorities continue to provide for sustainable supplies of aggregates into West Yorkshire in their Local Plans. Such authorities include North Yorkshire County Council, East Riding, Doncaster, Derbyshire and Yorkshire Dales.

6.3.2. Such an agreement has previously been reached with NYCC and a report on the connectivity between minerals planning in West Yorkshire and the North Yorkshire Sub Region was ratified by the relevant Leeds City Region/ West Yorkshire Combined Authority Portfolio Holders on 18 September 2015. The connectivity report confirmed that: 'Consideration should also be given to a similar endorsement between WYCA and Derbyshire CC'. The report also confirmed that:

> 'Discussion and liaison continues to take place at officer level between North Yorkshire County Council (NYCC), Derbyshire and the West Yorkshire authorities, with the WY Lead officer for WYCA meeting/liaising with NYCC to discuss the particular connectivity issues for a range of minerals and waste matter'.

6.3.3. A meeting between the lead officer for Minerals and Waste Planning of the West Yorkshire Combined Authority/ Leeds City Region and representatives from Derbyshire CC took place, with a view to progressing a similar connectivity agreement between Derbyshire and West Yorkshire. This document will serve to acknowledge and formalise the minerals planning linkages between West Yorkshire and Derbyshire.

6.3.4. A meeting was held in October 2017 between minerals officers representing the West Yorkshire Combined Authority, and East Riding of Yorkshire and Hull City Councils. During this meeting, cross-boundary

issues were discussed including the supplies of sand and gravel into West Yorkshire from East Yorkshire and also the potential for increased marine aggregate supply into West Yorkshire from landings at the Humber Docks. The importance of safeguarding the rail and wharf infrastructure within West Yorkshire which could facilitate the sustainable transportation of marine aggregates from the Humber was acknowledged.

6.3.5. It was agreed that aggregate movements from East Riding of Yorkshire to West Yorkshire had been taken into account in both the Humber LAA and the East Riding and Hull Aggregates Apportionment Background Paper. The Combined Authority was content that the proposed uplift in the East Riding/Hull primary aggregate apportionment figure for sand and gravel will contribute to the ongoing supply of sand and gravel to West Yorkshire. However the situation needs to be kept under regular review and further meetings arranged at appropriate intervals to ensure that any cross boundary issues between East Riding and West Yorkshire are identified and mutually understood and addressed.

6.3.6. However the situation needs to be kept under regular review and further meetings arranged at appropriate intervals to ensure that any changes to the cross boundary issues between East Riding and West Yorkshire are identified and mutually understood and addressed. Such evolving issues may include any significant increase or reduction in the supply of minerals from East to West Yorkshire or any significantly increased or altered distribution pattern for marine aggregates landed at the Humber Docks in Hull.

6.3.7. One of the outcomes of the joint working which has been undertaken with neighbouring authorities is the production of a joint Report on Magnesian Limestone, which also encompasses the extent of the resource occurring within the North and South Yorkshire. This document has identified cross-boundary minerals planning issues associated with the supply of, and demand for, Magnesian Limestone and will help to inform the approach taken to planning for this resource in relevant Local Plans and Local Aggregates Assessments.

6.3.8. Moving forward the West Yorkshire Combined Authority recognises the importance of engaging with all relevant neighbouring authorities to ensure continuity of supplies of aggregates into the future. In particular further and updated liaison will be required in relation to the shifting patterns of sand and gravel supply from North Yorkshire and Nottinghamshire and the implications of the shift in aggregate production away from the National Parks, particularly in terms of High Specification Aggregates.

6.3.9. Engagement will also be required with a range of stakeholders in relation to the supply of marine aggregates and the potential for a more significant proportion of West Yorkshire's sand and gravel needs to be met from marine dredged sources. Given the complexities of the supply chain for marine dredged sand and gravel, such liaison should involve the Crown Estate/ Marine Management Organisation as well as the Mineral Planning Authorities which host suitable landing wharfs and canal, rail and road

transportation facilities. This is currently undertaken to some extent through the Yorkshire and Humber Aggregates Working Party.

6.3.10. Engagement will also be required with relevant transport route operators including Network Rail and the Canal and River Trust. Preceding sections of this report discusses the recent feasibility work initiated by the Canal and River Trust with a view to opening up canal/ navigation waterway routes for commercial transportation of goods between the Humber and Leeds. Progress towards fulfilling this objective will be monitored and will inform future inter-Minerals Planning Authority Discussions regarding marine sand and gravel opportunities, alongside other areas of work.

6.3.11. To this end a meeting was held in October 2017 between minerals officers representing the West Yorkshire Combined Authority and the Humber Area. During this meeting cross-boundary issues were discussed including the supplies of sand and gravel into West Yorkshire from East Yorkshire and also the potential for increased marine aggregate supply into West Yorkshire from landings at the Humber Docks. The importance of safeguarding the rail and wharf infrastructure within West Yorkshire which could facilitate the sustainable transportation of marine aggregates from the Humber was acknowledged.

Appendix 1 - Active quarries which produce aggregate as at 31 December 2017

No.	QUARRY	OPERATOR	AGG TYPE
	BRADFORD		
1	Hainworth Shaw Quarry, Keighley	Allan Bailey	Sandstone, grit
2	Bank Top Quarry, Harden	M&M York Stone Products	Sandstone, grit
3	Naylor Hill Quarry, Haworth	Dennis Gillson & Son	Sandstone, grit
4	Bolton Woods Quarry, Bradford	Hard York Quarries	Sandstone, fine
5	Fagley Quarry, Bradford	Hard York Quarries	Sandstone, fine
	CALDERDALE		
6	Fly Flatts Delph Quarry, Warley	Rand & Asquith	Sandstone, grit
7	Mount Tabor Quarry, Halifax	Hard York Quarries	Sandstone, grit
8	Sunnybank Quarry/Delph Hill Quarry	Mr J Smith	Sandstone, grit
9	Ringby Quarries, Swalewsmoor	Mr J Tooby	Sandstone, grit
10	Upper Pule/Scout Moor Swalesmoor	Cleanmet	Sandstone, fine
11	Northowram Hill Quarry, Northowram	George Farrar Quarries	Sandstone, fine
12	Sunny Bank Farm, Southowram	Mytholm Stone Sales	Sandstone, fine
13	Pond Quarry, Lightcliffe	Hard York Quarries	Sandstone, fine
14	Pasture House Farm, Southowram	Marshalls Natural Stone	Sandstone, fine
15	Cromwell, Southowram	Marshalls Natural Stone	Sandstone, fine
16	Spring Hill Quarry, Greetland	Spring Hill Stone Sales	Sandstone, fine
17	Elland Edge Quarries, Elland	Rand & Asquith	Sandstone, grit
18	Wood Top Quarry	Cleanmet	Recycled Aggregates
	KIRKLEES		
19	Moselden Quarry, Scammonden	Marshalls Natural Stone	Sandstone, grit
20	Crosland Moor Quarries, Huddersfield	Johnson Wellfield Quarries	Sandstone, grit
21	Windy Ridge Quarry, Holmfirth	S. Peel and Son	Sandstone, grit
22	Hillhouse Edge Quarry, Holmfirth	Saxon Moor Ltd.	Sandstone, grit
23	Appleton Quarry, Shepley	Marshalls Natural Stone	Sandstone, grit
24	Sovereign Quarry, Shepley	Marshalls Natural Stone	Sandstone, grit
25	Temple Quarry, Grange Moor	Holgate Construction Lt	Sandstone, grit
26	Forge Lane Sand and Gravel Quarry	Dewsbury Sand & Gravel Lt	Sand & Gravel
	LEEDS		
27	Hawksworth Quarry, Guiseley	Apperley Bridge Aggre. Ltd	Sandstone, grit
28	Moor Top Quarry, Guiseley	RG Stone Sales	Sandstone, grit
29	Blackhill Quarry, Bramhope	Mone Bros Excavations Ltd	Sandstone, grit
30	High Moor Quarry, Bramham	Samuel Smith Old Brewery	Limestone, mag.
31	Britannia Quarry, Morley	Woodkirk Stone Sales Ltd	Sandstone, fine
32	Howley Park Quarry, Morley	Marshalls Natural Stone	Sandstone, fine
	WAKEFIELD		
33	Darrington Quarry (part), Knottingley	FCC Environment	Limestone, mag.
34	Plasmor Quarry, Knottingley	Plasmor Ltd	Limestone, mag.

	Sites permitted but not worked		
	SITE		AGG.TYPE
	Strands, Horbury - W ROMP Foxholes, Normanton - W ROMP Penbank, Castleford - W ROMP		Sand & gravel Sand & gravel Sand & gravel

Appendix 2 - Detailed Explanation of Uplift Calculation Methodology

- The uplift figure (U) is a figure intended to provide an estimate of the increase in production which would be required at quarries to meet the aggregate demands which would be associated with full delivery of the housing growth set out in emerging and adopted Local Plans.
- In order to undertake this calculation the following figures are needed.
- C – Historic Average Annual Number of Housing completions
- P – Planned Annul Housing Delivery
- H – % increase in house building required to meet Housing Delivery Targets
- A - % of quarry output utilised for house building and associated infrastructure
- Figure C was calculated through interrogation of the *live tables on housing supply: net additional dwellings - Table 122: housing supply; net additional dwellings, by local authority district, England 2001-02 to 2016-17* published by the government, as shown in the table below:

	District					
Year	**Leeds**	**Bradford**	**Kirklees**	**Wakefield**	**Calderdale**	**West Yorkshire Total**
2006/2007	2,820	2,340	2,660	840	1,280	**9,940**
2007/2008	3,070	1,400	2,680	1,690	1,310	**10,150**
2008/2009	3,320	2,200	1,490	1,120	490	**8,620**
2009/2010	1,730	1,760	1,090	680	570	**5,830**
2010/2011	1,180	1,460	1,250	970	510	**5,370**
2011/2012	1,930	730	940	850	370	**4,820**
2012/2013	1,560	720	580	530	500	**3,890**
2013/2014	2,230	870	1,040	810	330	**5,280**
2014/2015	1,980	1,130	520	1,130	560	**5,320**
2015/2016	2,470	900	1,130	1,920	330	**6,750**
2016/2017	2,820	1,490	980	1,820	380	**7,490**

- Figure P was calculated from a review of the emerging or adopted Local Plans of the 5 West Yorkshire Authorities, as shown in the table below:

District	**Document**	**Stage**	**Date of Document**	**Planned Housing Delivery**	**Plan Period**	**Plan Years**	**Annual Housing Delivery Target**
Leeds	Core Strategy Selective Review	Draft	Jul-18	54,352	2017 to 2033	16	3,397
Bradford	Core Strategy	Adopted	Jul-17	42,100	2013 to 2030	17	2,476
Kirklees	Local Plan	Draft	Nov-16	31,140	2013 to 2031	18	1,730
Wakefield	Local Plan	Draft	Oct-17	28,000	2021 to 2036	20	1,400
Calderdale	Publication Draft Local Plan	Draft	Jun-18	12,600	2018 to 2033	15	840

- Figure H was calculated by totalling the C and P figures for West Yorkshire as a whole and applying the following formula to the totals:
    - (P-C)/C.
- The result for figure H was 0.55 or 55%, i.e. a 55% increase in 10 year average house building in West Yorkshire overall will be required to meet planned housing delivery targets for West Yorkshire overall.
- A is a difficult figure to derive without the benefit of an extensive research project which analyses the output of crushed rock and sand and gravel sites and identifies the fates of all quarried material categorising these fates into A) quarried material

used directly or indirectly for house building and associated infrastructure and B) quarried material not used for any purpose associated with house building.

- North Yorkshire CC have undertaken some research in this regard and through a process of consultation eventually came to a compromise position with the Minerals Products Association who accepted that a figure of approximately 50% of output at sand and gravel sites could be associated with house building.
- More details of the methodology used to arrive at this 50% figure can be found in the following document:
    - 'Forecasting demand for aggregate minerals Discussion Paper - July 2014', published online by North Yorkshire County Council
- A lower figure was derived for crushed rock quarries; however, as West Yorkshire produces nominal amounts of sand and gravel and larger amounts of crushed rock, and the uplift figure is intended to compensate for West Yorkshire's reliance on aggregate material supplied from neighbouring authorities rather than allow for minerals needs associated with increased housing growth to be met from within West Yorkshire, it was considered appropriate to apply the higher figure of 50% for all West Yorkshire Aggregate.
- Having arrived at a satisfactory figure for H and A, i.e. 55% and 50% respectively the uplift in aggregate production required to deliver planned housing growth could then be calculated by applying the simple formula:
    - H*A, i.e. 0.55*0.5 = 0.275.
- The full formula could therefore be expressed as:

$$U=(((P-C)/C)*A)*100$$

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