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Director of Community Services
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FAO: Mr John Wright

Dear Sir

CONSULTATION ON LEICESTERSHIRE AND LEICESTER WASTE DEVELOPMENT FRAMEWORK – PREFERRED OPTIONS

Thank you for providing us with an opportunity to comment on the Leicestershire and Leicester Waste Development Framework Preferred Options Consultation including both the Core Strategy and Development Control Policies and the Site Allocations.

Introduction

Biffa Plc is the holding company of the Biffa Group, one of the largest waste management groups operating in the UK and the largest wholly British owned waste management group. The Biffa Group can justifiably claim to be the most diverse in terms of its spread of interests in industrial, commercial and domestic waste collection, recycling, treatment, landfill, and specialist liquid and hazardous waste management systems.

The Biffa Group's annual turnover is over £700m and operations comprise over 170 operating centres throughout the UK including Northern Ireland. Biffa handles around 12 million tonnes of waste materials per annum, which we treat, recycle, recover and/or landfill on behalf of an extensive public, commercial and industrial customer base. Biffa is also one of the largest operators of landfill sites in the United Kingdom, having 36 operational landfill sites and accepting about 8.5 million tonnes of waste into these sites each year. Biffa employs over 5000 personnel across the country.

A member of the Severn Trent Group



Biffa has an established environmental fund known as "Biffaward", which is a multi million pound environment fund managed by Royal Society of Wildlife Trusts (RSWT), utilising landfill tax credits donated by Biffa Waste Services. Biffaward is recognised as one of the most respected Landfill Communities Fund (formerly Landfill Tax Credit Scheme) distributors and has allocated, to date, more than £80million to some 1,000 projects throughout the UK.

General

We consider that the preferred options consultation documents are extremely well prepared and that, overall, the content fulfils the requirements of PPS10. We would also comment that the minerals and waste development framework site on the Leicestershire Web site has been straightforward to use and easy to navigate.

We are pleased to see that the County Council has taken an inclusive approach to preparing the documents and is consulting upon Core Strategy, Development Control Policies and Site Allocations together. It is our view that this the correct approach in ensuring a coherent plan.

We have a few comments to make on specific items in the Core Strategy and Development Control Policies and also wish to comment on the allocation of Newhurst Quarry in which Biffa has an interest.

Core Strategy and Development Control Policies

Policy 2: We agree with the intentions of this policy but as the Plan points out most of the development proposals to which the policy refers are district and not county matters. With this in mind, it is only Leicester that will be able to apply the policy with any weight. We understand that DCLG are looking at proposals to require waste plans to demonstrate how waste will be minimised during construction projects that are above a particular value. The Plans would be required, as part of the planning application process, and this would address the matters raised by this policy.

Policy 14: We support the encouragement given to an integrated approach to waste management through co-locating facilities.

Policy 27: We consider that this policy should be drafted in a more positive way. A landfill accepting non-inert wastes, and any tall structure associated with waste management close to an airfield by its very nature is a "new or increased hazard to aviation." The correct approach is to reduce that hazard to acceptable levels. The policy should be drafted along the lines of "*Planning permission will only be granted for waste management development which would give rise to new or increased hazards to aviation where that hazard can be reduced and maintained at a level acceptable to the County Planning Authority.*"

Policy 32, Box 3: We would ask that item 15; financial guarantees to ensure restoration is undertaken, is removed from Box 3. The restoration of sites

