



British Ceramic Confederation

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Our ref: CPH/HPC/BCC
6th October, 2006

Mr. John R. Wright,
Team Leader, Minerals & Waste Planning,
Environment & Heritage Services,
Community Services Dept.,
Leicestershire County Council,
County Hall,
Glenfield,
Leicestershire. LE3 8TE

Dear Mr. Wright,

Leicestershire Minerals Development Framework Preferred Options

I refer to the Leicestershire Minerals Development Framework Preferred Options consultation.

This response is submitted by the British Ceramic Confederation, the lead body for the UK ceramic manufacturing industry, representing the common and collective interests of all sectors of the industry. Its 150 member companies cover the full spectrum of ceramic manufacture, including the supply of materials, and plant and machinery, and comprise over 90% of the industry's capacity. Companies within the heavy clay sector of the industry, who extract their own minerals, manufacture bricks, clay roof tiles, clay pipes and refractories.

Policy 10 Brick Clay and Paragraphs 7.11 to 7.14

We object to this policy and its accompanying paragraphs as they are not in conformity with draft Annex 2 of MPS1 issued in July 2005, or with our understanding of the contents of the final versions of MPS1 and Annex 2 which are due to be published by ODPM later this month or in early November.

The extract in paragraph 7.11 from draft Annex 2 is inaccurate and misleading. Paragraph 2.36 of the draft Annex actually states: "*Because brickworks require high initial investment and continuing high levels of expenditure on plant and equipment throughout operation, a security of feedstock is required which is directly linked to the scale of investment envisaged at the works. MPAs should normally aim to maintain a stock of permitted reserves reflecting the proposed period for operation of the works which could, in some cases, be as much as 20 years or more.*"

The draft thus makes clear the expectation that an MPA should maintain a landbank on a site specific basis throughout the plan period. This reflects the recommendation in the detailed document which formed the basis of the Annex, namely *Brick Clay: Issues for Planning (DTLR/BGS 2001)*.

The calculation contained in paragraph 7.12 and Box 4 is therefore inappropriate, as it simply provides for an adequate landbank on a county basis only. This approach may be acceptable in the case of aggregates but is not so for brick clay. Continuing production of bricks and investment in plant, machinery and environmental improvement relies on the long term security of supply for particular brickmaking installations. Provision of at least 20 years supply for each site at any time during the plan period is required.

The meaning of the second sentence in paragraph 7.13 is not clear. We do not understand the nature of operational difficulties which could result in a landbank deficit. On the contrary the landbank should be structured as described above to avoid the possibility of operational difficulties resulting from uncertainty of minerals supply.

Paragraph 7.14 should refer to the need to identify additional reserves at existing clay operations to maintain the required site specific landbank throughout the plan period.

Policy 10 would be satisfactory only if it clearly indicated that the landbank to which it refers should be calculated in accordance with the policies and planning considerations contained in MPS1 Annex 2.

We suggest that, in considering these objections and drawing up the final draft for submission to the Government, full regard should be paid to the content of Annex 2 which will be published shortly after the close of the consultation period.

Yours sincerely,

A handwritten signature in cursive script, appearing to read 'C P Hall', written in dark ink.

C. P. Hall,
Commerical & Public Affairs Director.