



Campaign to Protect
Rural England

LEICESTERSHIRE
PO BOX 7986,
LOUGHBOROUGH
LEICS LE12 8DH

LEICESTER AND LEICESTERSHIRE DEVELOPMENT FRAMEWORK
WASTE SPATIAL STRATEGY FURTHER CONSULTATION
MINERALS SPATIAL STRATEGY FURTHER CONSULTATION

30th November 2007

For the attention of John Wright, Team Leader, Minerals and Waste Planning

Dear Sir,

By way of a preamble we are conscious of the effects of 'Peak Oil', already beginning to make its mark as the price of a barrel of crude oil nears \$100. Consensus among experts in the field points to the commencement of decline in crude oil production circa 2010-2012. Following the peak there will be an estimated initial 2% decline in production per annum. This will have far-reaching and major effects on plans being drawn up at present. It is all too easy to forget the 'Energy Crisis' of 1979 when Iran cut back its production and supply of crude oil by 4%, resulting in a tripling of oil prices. It appears to us that little or no consideration is publicly being given to this imminent problem either by central government or by local planning authorities.

In response to the above consultations we make the following brief comments:

WASTE

The most important target is effecting behaviour change. This involves educating the public and businesses to reduce consumer demand and profligacy. A better understanding of the need for improved separation of refuse at source for more efficient recycling is vital. For the reasons explained above it will become necessary to avoid additional costs and therefore reducing contamination and commingling of household waste at source is essential. This is not too demanding an expectation if sustainable aims are to be met. Is there a Council budget for raising awareness in schools and homes?

Food waste is a particular problem and this is not addressed by the consultation document. Treatment, such as anaerobic in-vessel-containment is a solution, though this requires outlay to provide the necessary infrastructure. Two websites of interest here are WRAP and Love Food Hate Waste (www.wrap.org.uk/index.html and

www.lovefoodhatewaste.com). There is also a greater need for home composting and the provision of free kits and educational material, plus the required financial backing. It also appears to us that considerations of novel treatments have not been fully addressed.

Regarding the location of treatment sites (Issues and Options, paragraph 4.2, page 15) Option 3 would appear to be the most reasonable choice. We of course agree with and support the sentiments expressed in paragraph 4.20. A question arising from this is whether some waste treatment sites would share the same locations as those dealing with the recycling of inert hard materials, as outlined in paragraph 4.7 on page 12 of the Minerals Consultation.

It is particularly worrisome to us that the word 'incineration' has been omitted from the consultation document, in favour of 'energy value/recovery'. The health aspects of the fall-out from incinerator flue gases are becoming better understood, partly from direct studies and partly from nanotechnology developments. Air quality tends to concentrate on ten micron mean particle diameters and not necessarily on the toxic load these particles might carry. Focusing on measurements of 5 and 2.5 micron particles are not much better from a health perspective than measurements of ten-micron contamination. That is, particles of these dimensions remain extra-cellular and can thus be voided from the healthy respiratory tract. Even so, the air should not be contaminated by such particles at all. It is only when you encounter particles in the micron and sub-micron range that intracellular pathology occurs. No matter how efficient the technology behind incinerators is claimed to be, the health risks must be weighed.

In conclusion, public education is a priority. Without any widespread understanding of the need to reduce and recycle it will be difficult to obtain the degree of compliance necessary. We also feel that at the regulatory end of the waste treatment process there needs to be a commitment analogous to the Merton Rule, exceeding the demands of the forthcoming EU Waste Framework Directive.

MINERALS

Environmentally, Leicestershire is unfortunate in being at the edge of the 'stone line' for mainland hard rock supplies, most of which is destined for markets in the South East. While there may be competitive marketing to sell these products from the county, is enough being done to promote the re-use of recycled building material products, derived from brick and concrete waste and power station fly-ash? Would the use of Newhurst Quarry (4.7, p.12) fulfil such a requirement?

We cannot really comment on paragraph 4.12 since we have no data on proven reserves. Restoration Bonds are all-important material considerations, especially where sand and gravel extraction is concerned. This requires co-ordination with organisations such as ourselves, the Leicestershire & Rutland Wildlife Trust, RSPB, etc. to ensure that the highest standards of habitat creation for biodiversity are attained. The Regionally Important Geological Sites (RIGS) Group should also be consulted not only where existing sites are concerned but any newly opened quarries and pits too.

We wonder what factors affect the demand for the mining of gypsum. For example, what percentage of the market is currently met by gypsum derived from Flue Gas

Desulphurisation and how this demand will change in the future. The demand for gypsum-based thermal insulation building products may well sharply decline as the required standards in near-zero carbon homes is more demanding. For example, 'Celotex', recycled cellulose 'wool' and other products such as mineral fibre/recycled glass fibre and sheeps' wool are superior thermal insulators.

Regarding transport issues and sustainability, we do not have sufficient information, other than to comment that perhaps there is a need for an intermodal facility at a suitable railhead.

We hope you find our comments useful.

Yours sincerely,
Graham Stocks.