

6th October 2006

Our Ref: LCC/LDF/REPS/01
Your Ref:

Planning Services
Leicestershire County Council
County Hall,
Glenfield,
Leicester
LE3 8RA



Dear Sirs

Waste Development Framework – Preferred Options

Representations on behalf of: Falcon Waste Development Land Company Limited

CORE STRATEGY

Policy 4: Allocated Sites and Areas for Waste Management Development

Policy 4 states that sufficient sites will be allocated to provide for a waste management capacity of at least 10 years. We are concerned that those sites identified in the Site Allocations Preferred Options report will not provide for sufficient capacity over the plan period. Whilst the supporting text to this policy, paragraphs 6.14 – 6.15, does not rule out the ability to obtain planning permission on non-allocated sites we feel that more robust wording in the policy is necessary to allow for the necessary flexibility in site identification and selection over the lifespan of the plan. This will be necessary if the County Council is to adopt a proactive approach to strategic waste management in line with current government policy to *plan, monitor and manage*.

Policy 5: Waste Management Development Outside Allocated Sites

The principles of Policy 5 are welcomed. However, further clarity is required in this policy regarding the criteria to be adopted for assessing the acceptability of non allocated sites. As proposed Policy 5 has two determining criteria that require unallocated sites to be equally or more sustainable than those site specifically allocated. The sentiment of this is supported but we feel that the

policy should expand upon the definition of 'sustainable'. It is likely that new developments and technologies will be developed over the plan period that will result in cleaner and more efficient waste management processes. Such processes will result in less carbon emissions, less unusable bi-products and a greatly reduced reliance on landfill. Such developments are inherently more sustainable and should be acknowledged as such.

Section 7: The Preferred Policies for Securing Waste Re-use, Recycling and Recovery Facilities – (Policies 6 – 10)

Policies 6 – 10 identify the hierarchy for the managing of waste and are consistent with PPS10. We are concerned that new technologies, such as using an *Autoclave Steam Sterilisation and Recycling Process* that have been developed to deal with bulk waste through a system that is totally self sustaining are identified in the second lowest tier of preference, i.e. under Policy 9. Such processes do not necessarily require sorting and can be collected from the point of source. It is therefore considered that in hierarchical terms the County Council could promote new clean technologies at the highest order of preference.

Policy 13: Other Forms of Waste Management

We welcome the inclusion of Policy 13 that allows for other forms of waste management that are not specifically referred to in other policies. However, the explanatory text only seems to suggest that the utilisation of landfill gas to produce energy. We feel that the text should go further and reflect the ongoing developments in waste management processing. Additionally, the policy needs to provide for sufficient flexibility to allow new technologies to expand into the waste management market during the lifespan of the plan. If the policies are too rigidly worded we are concerned that the County Council will have severe difficulties in supporting new and more sustainable processes.

SITE ALLOCATIONS

It is noted that a list of preferred sites and the potential uses has been identified in the Site Allocations Preferred Options paper. As part of the Waste LDF process we wish the County Council to consider an additional site that appears to be sequentially preferable to some of those sites already identified as being preferred.

It is noted that the majority of the preferred sites identified in the report are located in and around the urban area and urban fringe of Leicester. There is a lack of preferred locations identified in the northern part of the county, particularly in locations that will serve Loughborough. Comments are made on the appropriateness of the inclusion of 2 of the sites shown either within or close to Loughborough later in this submission.

The attached plan indicates an 8 acre site located immediately adjacent to the Existing Wymeswold Industrial Estate. The site is a former airfield and contains a number of substantial buildings. The land is previously developed

