

Mr Lonek Wojtulewicz
Planning Group Manager
Environment & Heritage Services
Community Services Department
Leicestershire County Council
County Hall
Glenfield
Leicestershire
LE3 8TE

The Belgrave Centre
Stanley Place
Talbot Street
Nottingham NG1 5GG
Switchboard: 0115 9719971
Direct Line: 0115 9712582
Email:
stephen.birkinshaw@goem.gsi.gov.uk
Website: www.goem.gov.uk.

Your Reference: JW/PL
Our References: EMP2400/475/14 & 15
Date: 6 October 2006

Dear Lonek

**LEICESTERSHIRE MINERALS DEVELOPMENT FRAMEWORK (PREFERRED OPTIONS) AND
LEICESTERSHIRE & LEICESTER WASTE DEVELOPMENT FRAMEWORK (PREFERRED
OPTIONS)**

Thank you for inviting GOEM, on behalf of the Secretary of State, to participate in the development of the Minerals Development Framework (MDF) for Leicestershire and the Waste Development Framework (WDF) for Leicestershire & Leicester. The comments below are intended to assist you in the preparation of sound submission documents.

You may recall that I met with the Minerals & Waste Planning Team on 15 February this year, at which time I raised the concern that the team had not made the adjustment to the new planning system and were seeking to replicate an old style Local Plan through the simultaneous progression of Core Strategy and Site Allocation DPDs. I also drew the team's attention specifically to the purpose of the Core Strategy to establish a strategic approach. The documents you have published for public participation do not appear to have taken this advice into account.

In effect, the Core Strategy Preferred Options you have submitted seek to avoid establishing spatial strategies. As Leicestershire County Council is an established Minerals and Waste Planning Authority with extensive experience of strategic planning, GOEM considers you to be well placed to establish spatial strategy. GOEM does not accept that it is not possible to generate spatial strategy options for minerals or waste, which in itself is contrary to national planning policy set out in PPS 12 and PPS10 and its companion guide. There are instances where you have made strategic judgements in your documents and even the decision not to pursue spatial strategy is a strategic option of sorts. None of these strategic judgements have been subject to consultation or sustainability appraisal, contrary to the requirements of the new planning system.

It is acknowledged that District Local Development Frameworks differ from Minerals / Waste Development Frameworks in terms of the scope of their topic material. However, there is nothing in Government planning guidance to suggest that these differences require an entirely different approach to the basic elements of new development plans, such as the need to test alternate spatial strategy and propose preferred spatial strategy at the Preferred Options stage of Core Strategy DPD production. Without such a strategy, it is difficult to see how the suitability of subsequent allocations or applications can be evaluated. Regrettably this appears to be the case in respect to the allocations proposed in your Site Allocations DPDs, which appear to be opportunistic in nature rather than driven by an integrated spatial strategy.

Though you have made clear linkages between your emerging DPDs and either other minerals or waste strategies, you do not appear to have taken into account any linkages with other strategies, including any that exist between these development plan documents. The documents consequently give the impression of having been developed in the isolation of the planning section, rather than as corporate documents taking into account the wider aspirations of other key stakeholders, including the local community.

More detailed comments on the separate issues for minerals and waste are attached for your consideration.

Yours sincerely

Jeremy Donovan

P.P. STEPHEN BIRKINSHAW
Strategic Planning Area Manager
Leicester & Leicestershire Area
Government Office for the East Midlands

