

Our ref: HA 003/010/000035  
Your ref: JM/NH

C3  
5 Broadway  
Broad Street  
Birmingham B15 1BL

John Wright  
Planning Group  
Leicestershire County Council  
County Hall  
Glenfield  
Leicester  
LE3 8TE

Direct Line: 0121 687 2502  
Fax: 0121 678 8211

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Dear John

## **FURTHER CONSULTATION ON LEICS MINERALS DEVELOPMENT FRAMEWORK AND LEICESTERSHIRE AND LEICESTER WASTE DEVELOPMENT FRAMEWORK**

Thank you for your letter of 17<sup>th</sup> October, inviting the Highways Agency (HA) to comment on the above documents.

The HA's view is that a strategic vision for waste disposal and minerals site provision should be founded on an approach which reduces the distances material has to be transported from its source and maximises the potential for its movement by sustainable modes. This would then form the basis for specific site allocations. Specific comments on each document are given below.

### **WASTE SPATIAL STRATEGY**

The identification of sufficient sites to avert the disposal of 38% of waste produced in Leicestershire being transported to surrounding counties is imperative in reducing longer distance trips and additional stress on the network.

The scale of waste sites to be provided should be based upon an understanding of the annual levels of waste produced within the County and upon access considerations. This should include a broad assessment of additional trips likely to be generated, potential impacts (particularly any potentially serious impacts which could make a scheme unviable) and how risks regarding the operation of the transport network will be addressed (e.g. through application of planning policy). If no information on the approach to transport issues and potential impacts is provided, it will not be possible to understand the potential impact on the Strategic Road Network – or local highway network – and this could raise questions in relation to the soundness of the plan.

Of the four approaches put forward in the Issues and Options Report, it is felt that Option 3 may most effectively minimise the impact upon the strategic road network and be most suitable for the disposal of the variety of waste types set out in the Strategy. However, the provision of large sites should be decided on the basis that they have the ability to be accessed via sustainable modes of distribution, most notably rail, and that the impact of additional movements on the network is assessed prior to future

development. It is noted that the potential within the Framework area for such transfer to rail is limited. The Strategy should ensure, however, that development is prioritised in sustainable locations where possible.

The modelling of the potential locations for the siting of residual waste treatment facilities is seen as a good basis upon which to make site allocations to reduce the distance over which waste would be transported. However the identification that many of these are located within the M1 corridor highlights the fact that a detailed understanding of the potential impact upon the SRN is required to ensure the cumulative impact of site allocations within this corridor is not to the detriment to the efficiency or safety of the motorway. A Full Transport Evaluation, as described in Circular 02/07 and the DfT document *Guidance on Transport Assessment*, may be required to be undertaken to achieve this at a strategic level.

Whilst individual sites may not result in a significant number of additional trips on the network, it is important to understand the overall implications of the additional traffic movements generated. Junction specific modelling may be necessary in those locations in close proximity to the SRN at the planning application stage of the planning process.

The document is broadly welcomed in putting forward a number of alternative approaches to strategic site allocations. Each of the 4 options put forward may have benefits and disadvantages for the highway network and require careful consideration. It is felt however that the overriding principles of locating waste disposal provision close to the source of waste generation and maximising the ability of these sites to be served by sustainable modes should be adhered to.

The modelling work which has been undertaken to identify the location of strategically important waste disposal sites forms a base to support the strategic site allocations. However in taking the Strategy forward, a more comprehensive transport evaluation will be required to ascertain the cumulative effects of these site allocations on the strategic road network, before such sites may be endorsed. This evaluation should conform to the guidance set out in Circular 02/07 and the DfT document *Guidance on Transport Assessment*. This work is necessary to ensure that the policy will comply with the relevant tests of soundness set out in Paragraph 4.24 of PPS12, and in particular test vii) which requires that plans are founded on a robust and credible evidence base.

## **MINERALS SPATIAL STRATEGY**

The identification of HGV routes to minimise the impact of minerals transportation on local communities is recognised as a sensitive approach to minerals planning. Consideration should also be paid to the potential impact of directing HGVs onto these routes in relation to the strategic road network.

In view of the nature of minerals extraction being restricted due to minerals' geographical locations, the potential within the Framework area for the transfer of minerals to rail and waterborne transport is limited. The Strategy should ensure, however, that development is prioritised in sustainable locations where possible. The Highways Agency (HA) acknowledges and supports the use of rail based distribution at

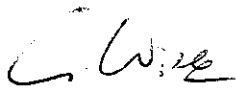
various existing sites in Leicestershire, notably Bardon, Cliffe Hill, Croft and Mountsorrel, and future extraction should be considered in these locations in order to maximise the sustainable provision of crushed rock requirements for the region and further afield where appropriate, particularly the south east, to avoid the need for these resources to be transported longer distances, and potentially by less sustainable modes

It is recognised that the scope for influencing changes in minerals provision within the timeframe of the Plan is limited due to the fact that by its nature, minerals operations are long term commitments. However the Spatial Strategy appears credible in seeking to reduce the distances extracted minerals are transported, reducing the impact on local residents and maximising sustainable distribution.

With regard to the extension of existing sites to meet the minerals apportionments for the County, those which may generate a significant additional number of traffic movements in close proximity to the SRN would require further work to be undertaken by the Local Planning Authority in order to identify the measures necessary to reduce the impact of those sites on the network at the Site Allocations stage of the LDF process. A Full Transport Evaluation, as endorsed in Circular 02/07 and the DfT document *Guidance on Transport Assessment*, should be undertaken to meet this requirement in each instance. This work is necessary to ensure that the policy will comply with the relevant tests of soundness set out in Paragraph 4.24 of PPS12, and in particular test vii) which requires that plans are founded on a robust and credible evidence base.

We wish to remain involved in all future stages leading to the adoption of the Minerals and Waste Core Strategies and look forward to working proactively with Leicestershire County Council with particular reference to its allocations and their impact on the Highways Agency's network. Please do not hesitate to contact me if you have any queries.

Yours sincerely



Geoff Wise  
Planning Manager  
Network Strategy East Midlands  
Email: [geoffrey.wise@highways.gsi.gov.uk](mailto:geoffrey.wise@highways.gsi.gov.uk)