

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

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4th August 2008

Dear John,

**LEICESTERSHIRE MINERALS DEVELOPMENT FRAMEWORK AND
LEICESTERSHIRE AND LEICESTER WASTE DEVELOPMENT FRAMEWORK:
CORE STRATEGIES AND DEVELOPMENT CONTROL POLICIES DOCUMENTS**

Thank you for your letter of 18th June, inviting the Highways Agency (HA) to comment on the above submission documents. The documents emphasise that waste disposal and minerals site provision should minimise the distances material has to be transported from its source and maximises the potential for its movement by sustainable modes. The HA supports this position, and welcomes the high level strategic aims of both documents as providing a basis for specific site allocations.

It would be helpful if both Core Strategies demonstrated that consideration will be given, at site allocation stage, to the overall implications of additional traffic movements that may be generated by waste and minerals development in the area, and the extent to which these could give rise to specific problems on the Strategic Road Network (SRN). Given the number and scale of likely minerals and waste developments in the County, overall transport impacts on the SRN may not give rise to major concerns, and localised impacts from site development may well be capable of being addressed at the planning application stage. However, evidence should be provided in the LDF to demonstrate that this is likely to be the case, rather than leaving it to at the planning application stage. This is particularly important for the Waste site allocations, since a significant number of smaller sites may be proposed: assessment at Site Allocation stage would allow for the potential for cumulative impacts to be assessed more thoroughly than through a piecemeal approach through planning applications. Full Transport Evaluations, in accordance with Circular 02/2007 (Planning and the Strategic Road Network) and the DfT 'Guidance on Transport Assessment', should therefore be undertaken for each proposed waste or minerals site during the Site Allocation stage.

Specific comments on each document are given below.

WASTE SPATIAL STRATEGY

The Core Strategy continues the approach contained in Option 3 from the previous Preferred Options consultation document. The HA supports this strategy, which allows for the sustainable location of facilities in proximity to where waste is created, whilst allowing for economies of scale in waste disposal and recycling.

As the document does not give site specific locations of proposed new waste site facilities, it is not possible to determine whether any sites would affect the operation of the SRN. However, the HA supports Policies DC10, DC17 and DC18 as these aim to control the granting of planning permission where sites would have a detrimental effect on the SRN, whilst supporting the use of more sustainable transport modes. The HA particularly supports the statement in Policy DC10 that planning permission for waste development involving road transport would not be granted unless the highway network is able to accommodate the increase in traffic generated.

The HA also supports the intention to allocate waste sites in areas where there is potential to utilise local rail access and thereby reduce the number of HGV trips, subject to transport impacts being investigated and a package of measures identified to minimise any adverse transport impacts. Any measures deemed necessary should be implemented through the provision of planning conditions or obligations (as per Policies DC17 and DC18).

MINERALS SPATIAL STRATEGY

The HA particularly supports the statement in Policy DC14 that planning permission for minerals development involving road transport would not be granted unless the highway network is able to accommodate the increase in traffic generated by the production of minerals.

Detailed consideration of the extension of existing minerals sites which may generate a significant additional number of traffic movements in proximity to the SRN will be required, to identify the measures necessary to reduce the impact of those sites on the SRN as and when site specific proposals are identified. Any measures deemed necessary should be implemented through the provision of planning conditions or obligations (as per Policies DC18 and DC19).

I 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 the site allocation documents and their impact on the Highways Agency's network. Please do not hesitate to contact me if you have any queries.

Yours sincerely,



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