



Lands and Planning

Leic C Pol/071128/SCI

28th November 2007

Director of Community Services
 Leicestershire County Council – Planning Group
 County Hall
 Glenfield
 Leicester
 LE3 8TE

Dear Sir,

Ibstock Brick – Leicester WDF Further consultation, Waste

Thank you for your letter of 17th October 2007 in connection with the above and attaching both the Minerals and Waste Spatial Strategy further consultation documents.

We thank you for the opportunity to participate at this stage of the Minerals and Waste Development Framework. Our comments in relation to the relevant documents are set out in separate letters, this relating to the Waste Spatial Strategy.

In general terms we consider that the information provided gives a good overview of the industry including the location on waste processing in Leicestershire. The spatial portrait is a useful document in highlighting the key social, economic, environmental and resource issues in the area and during the plan period. We do have a number of specific comments on the document and these are set out below relative to the respective headings and sections.

Background

- Page 1, 1.1 – (MDF) should be corrected to (WDF).

Next Stages

- Page 2, 1.9 – We note that the Waste Allocations has been separated from the Core Strategy. It is stated that 'further sites' will be considered in 2009, suggesting that a pre determined list is developed and may be added to at that time. We respectfully suggest that this text should be clarified in that when Site Allocation documents are prepared in 2009, full opportunity will again commence for site allocations, not merely consideration of additions thereto.

Spatial Characteristics relevant to the framework area

- Page 5, 2.9 – We support the view that waste sites and particularly landfill schemes lend themselves to mineral sites. In particular, clay quarries can provide a good receptor for waste due to the naturally impermeable nature of the strata.

We also note the reference that residual waste is currently transferred outside of the Framework Area to landfill which is less sustainable in terms of transportation.

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At the appropriate Allocations time and connected to our comments above, we would look towards assisting with our Leicester brickworks clay quarry and lands.

The spatial strategy for waste

- Page 7, 3.1 – Related to the above, we again note that current need for exportation to other authorities. The potential for waste recycling, treatment and disposal at the Leicester quarry site may assist in a more sustainable approach.
- Page 8, 3.7 – We have concerns with the content of the first sentence in the suggestion that restricting landfill capacity is a mechanism to assist recycling targets. Recycling targets should be achieved through the provision of facilities to encourage this, thus resulting in a reduction of residual waste and the need for landfill. We note the latter sentences of the paragraph on page 9 and the requirement for further landfill capacity and again refer to the potential at Leicester.

Issues and options consultation

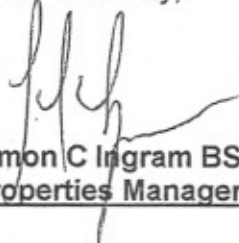
- Page 11, 4.2 – Whilst we acknowledge we are not requested to comment on the options, the lack of definition for 'site' somewhat leaves this term open to the widest definition of waste processing and disposal facilities. We have assumed this in the rest of the text and comment as such below.
- Page 13, 4.9 – We note the result of the Entec assessment of optimal locations and highlight the strategic location of Ibstocks Leicester clay quarry and the potential importance in the future strategy. The new access road linking the Leicester site to Whitehill road provides a good access route to the motorway network, minimising traffic impact on the built environment.

Strategic Sites

- Page 17, 4.24 – We again reiterate our comments in relation to future site allocations and the need for a full review upon the commencement of such documents in 2009. This will enable sites to be promoted including the Leicester quarry and which can assist in the targets of the plan.

We hope the above is useful in assisting this stage of the Minerals Development Framework in Leicestershire and look forward to your comments.

Yours Faithfully,



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Properties Manager – South