

Leic C Pol/080801/SCI

1<sup>st</sup> August 2008

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

Dear Sir,

**Ibstock Brick – Leicester WDF Core Strategy and DC policies - Waste**

We refer to the current consultation in connection with the above and the separate consultation document in relation to Minerals Core Strategy and Development Control 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. We believe that significant cross over exists between this and the minerals response. The two letters should therefore be reviewed together.

This response has been prepared in letter format. We did review the online form and the electronic method on the website. We are however of the opinion that these other two methods are not particularly user friendly and would have consumed considerably more time in submitting responses.

In general terms we consider that the Waste Core Strategy provides a good overview of the industry and waste management in Leicestershire. The DC policies provide a insight into the final means of future development control in the County and is a welcome milestone emerging out of the long development of the documents.

Our comments are set out to follow the order of the consultation document, cross referencing as appropriate.

Back ground

Page 14, para 2.42 and 4.4 - We note the reference that residual waste is currently transferred outside of the Framework Area to landfill, which is less sustainable in terms of transportation. At the appropriate Allocations time, we would look towards assisting with our Leicester brickworks clay quarry and lands. The potential for waste recycling, treatment and disposal at the Leicester quarry site may assist in a more sustainable approach.

Page 21, para 4.11 – Whilst reference is made to the Entec study, it is noted that comments are not requested on the details of the study findings. The 2006 study and changing circumstances since that time should be a consideration at this stage.

Serving Forticrete and Ibstock Brick

Policies should maintain an open view to strategic sites which are located outside of the area identified but which could assist in the provision of facilities identified in 4.17.

Page 23, para 4.17 – The reference Strategic Sites is not defined in the document, however some of the text suggests that these do not include land fill. We consider that the characteristics of strategic sites as set out in parts A to E can be identified in certain land fill facilities and these should therefore be considered appropriate as such.

Page 23, Policy CS2 (Strategic Waste Sites) – We consider that our Leicester site could be considered a Strategic Site however this seems to be outside the Broad Locations. We again refer to our comments with regard to para 4.11 above. 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. We also refer to our comments of the 28<sup>th</sup> November 2007 in which we noted your confirmation that specific allocations will be the subject of future DPD's. We therefore highlight that we should look towards the promotion of the Leicester site in the allocations. The Broad Locations as currently set out should allow this flexibility.

Page 26, Policy CS4 (Locating waste sites) – The policy suggests a sequential approach to waste sites. Under bullet two we must clarify that the list A – F should be clear as to not be sequential and that this only applies to the two bullet points. As identified by paras 4.23 and 4.26, former minerals sites such as our Leicester site could provide a suitable location in this respect.

Page 29 – A number of processes are described in the production of energy from waste. It is considered that reference to the production of energy from landfill gas should also be listed. This represents a good source of non fossil energy production from landfill activities. This reference should be carried into Policy CS6.

Page 31, para's 4.47 and 4.49 – Refer to the potential shortage of landfill space and the potential for alternative locations. 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.

As highlighted in our responses to the Minerals Core Strategy and DC policies, we see that the Minerals and Waste documents produce duplication between the two. There are a number of policies, specifically in the DC sections which are broadly similar and with minor amendment could be brought together. We consider that regard should be given to bringing the documents together in order to provide a more streamlined overall plan.

In addition to the above, it is highlighted that the policies as currently drafted have the potential to create confusion between the two plans. The Core Strategy policy reference numbers differ between the two documents for the same policies eg CS11 in minerals equates to CS10 in waste, CS13 in minerals is CS12 in waste. If some combination of the documents is not capable, it is considered that in order to reduce confusion of referencing in future policies, the waste policies should all be prefixed with 'W'.

In relation to the Waste Development Control policies, a number of the issues highlighted in the Minerals DC policies are also within the waste. The amendments proposed in minerals should be replicated in waste.

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**