

My Ref: 020 LAL LCC sjw

Your Ref: JW/NH

Date: 1<sup>st</sup> August 2008

Mr J R Wright  
Team Leader – Minerals and Waste Planning  
Environment and Heritage Services  
Community Services Department  
Leicestershire County Council  
County Hall  
Glenfield  
Leicestershire  
LE3 8TE

Dear Mr Wright,

**LEICESTERSHIRE MINERALS DEVELOPMENT FRAMEWORK – CORE  
STRATEGY AND DEVELOPMENT CONTROL POLICIES**

**REPRESENTATIONS ON BEHALF OF LAFARGE AGGREGATES LTD**

Thank you for consulting with us on the above document.

We set out below our comments on behalf of Lafarge Aggregates Ltd for whom, as you know we have promoted a number of sand and gravel extraction sites to sustain supply across the MDF period. Lafarge clearly also have significant interests in Leicestershire in terms of their igneous crushed rock production at Mountsorrel, which are of much more than just local importance.

**Core Strategy**

Following our concerns raised in our letter dated 29 November 2007, we feel that the Core Strategy is much improved in both its layout and content, and overall support the strategy.

The Spatial Vision and Objectives set out on page 14 are supported.

Policy CS1 sets out the strategy for the supply of minerals. This policy is supported.

Paragraph 4.16, page 18, makes reference to Annex 1 of MPS1 and the recommendation for landbank indicators of at least seven years for sand and gravel and at least ten years for crushed rock. The paragraph also states that it is the intention of the Core Strategy not to make any provision for landbank beyond the end of the MDF plan period. We do not agree with this approach, we would recommend that the landbank is extended beyond the end of the plan period, seven years for sand and gravel extraction and ten years for crushed rock operations.

Paragraph 4.28, page 21, sets out some of the varying circumstances that may arise to justify the extension of existing quarries, this approach is supported.

Paragraph 4.29, page 22, recognises that quarries producing rock aggregates generally will require a longer security of reserves to justify capital investment. This recognition is welcomed; however, we believe that the justification for longer security of reserves goes much further. As recognised in paragraph 2.25, page 11, Leicestershire is one of the principal producers in the country, particularly igneous rock. There should be support for the long term security of supply of these regionally and nationally important reserves, which includes extending the landbank beyond the end of the plan period.

Policy CS2 sets out the strategy for aggregate minerals. Overall we support this policy except for the first bullet point which recommends making land available to the end of the plan period only. We recommend that the landbank be extended beyond the end of the plan period as outlined above.

Paragraph 4.76, page 34, discusses the potential use of recycled and secondary aggregates, it is welcomed that there is recognition that this source of aggregate can only be used as basic materials in construction projects.

Although secondary and recycled aggregates have an important role to play they cannot fully replace primary aggregates.

Paragraph 4.79 to 4.84 discusses the protection of minerals from sterilisation, we would like to see within this text a recommendation that protects aggregate railheads from locating sensitive uses in close proximity.

Policy CS10 sets out the strategy for resource management. This policy is supported but we would like to see included the protection of aggregate railheads from the locating of inappropriate development in close proximity.

Policy CS11 sets out the strategy for environmental protection, no objection to this policy.

Policy CS12 sets out the strategy for minerals development within the Strategic River Corridors and is supported.

Paragraphs 4.96 to 4.98, and Policy CS13 sets out the strategy for minerals development within or adjacent to the Charnwood Forest. Whilst the Charnwood Forest is an important regional landscape it is not of national importance. We recognise that this is reflected within Policy CS13 which is supported.

Policy CS16 sets out the strategy for the transportation of minerals. The policy and supporting text recognises that the majority of minerals need to be transported by road, and that other means such as rail or water are not always practicable. Policy CS16 is supported.

Policy CS17 sets out the strategy for reclamation and future use of mineral sites and is supported.

### **Development Control Framework**

Policy DC 1 requires development to demonstrate that the Government objectives for sustainable minerals development have been appropriately addressed. It is questioned whether this policy is necessary given that it is already covered in MPS1.

Policy DC4 seeks to offer protection to sites of regional and local importance. Included within the list, which is generally supported, is bullet point (v) protection of Special Landscape Areas. PPS7 recommends that utilising tools such as landscape character assessment should provide sufficient protection to landscape areas without the need for rigid local designations. We recommend that bullet point (v) of Policy CS4 is amended to read 'landscape features of importance'.

Policy DC8 seeks to restrict any form of development within a Mineral Safeguarded Area. This policy is supported. We would like to recommend that aggregate railheads be included within Mineral Safeguarded Areas in the Site Allocations DPD.

Paragraph 5.36 discusses the cumulative impact of a mineral proposal and states that the impacts of a mineral proposal are considered in conjunction with the impacts of other past, present or reasonably foreseeable developments. We would like further clarification on how far in the past would be taken into consideration in terms of cumulative impact. Policy DC13, Cumulative Impact, appears to suggest it would be the result of concurrent or successive operations.

It is also not clear from the supporting text or Policy DC13 how the collective effects of different impacts of an individual proposal will be assessed. Paragraph 5.35, page 58, correctly quotes from MPS2, *'impacts that are acceptable individually should not be regarded as unacceptable in combination without a proper assessment'*.

On behalf of Lafarge Aggregates Ltd we would be happy to discuss with you and your colleagues our views set out above as we do think it is important that the main interested parties, including the minerals industry and the local authority, liaise to try and ensure that the Leicestershire MDF is robust and sound.

I trust the above comments are of help to you.

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Yours sincerely,

Heaton Planning Ltd

**CC:** T Deal, LAL

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