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Dear Sirs

### **Leicestershire County Council Minerals Development Framework**

Thank you for consulting the QPA in respect of the Submission Draft Minerals Core Strategy.

The QPA is the principal trade association representing the quarrying industry in the United Kingdom. Our members produce almost 90% of the total UK output of aggregates. They are also responsible for producing important industrial materials such as silica sand, agricultural and industrial lime, ready-mixed concrete and mortar and blacktop for roads.

Having reviewed the document we have the following comments to make.

#### **The Objectives**

Paragraph 3.7, Sub paragraph 5 implies that the needs of the natural and built environment should always take priority over the need for minerals. That is inconsistent with many statements in MPS1 and notably the fourth bullet point of paragraph 15 of that policy statement.

As written that objective is inconsistent with national policy and is not effective in delivering national policy as it is too inflexible to ensure that an adequate and steady supply of minerals is maintained. It therefore renders the Core Strategy unsound.



The trade association for all aggregates, asphalt ready-mixed concrete, mortar, silica sand and lime  
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It should be re-worded:

“To ensure that all land use considerations are taken into account when planning for future minerals extraction in order to achieve the best integration of social, environmental and economic interests.”

#### **Paragraph 4.16, Box 1 and Box 2**

The final sentence of paragraph 4.16 is misleading. It should state that: “calculations of future requirements are based on all identified areas coming forward as planning applications, planning permission for those areas being granted and it being acceptable for landbanks to fall below the minimum level in 2011 (crushed rock) and 2014 (sand and gravel)”.

For crushed rock in particular this is not acceptable. It would be almost impossible for a review of the Site Allocations DPD to be completed and planning permissions for the first of those sites to be granted, before the crushed rock landbank falls below the minimum in 2011.

Whilst MPS1 (Annex 1, Para. 4) does not require provision to be made for landbanks to be maintained beyond the end of the plan period, MDFs should show how they can be maintained at the end of the plan period.

The proposed levels of provision shown in Box 1 and Box 2 are not in accord with national policy and hence with Submitted Policy CS2 bullet point 2. Therefore QPA believe that the Core Strategy is unsound as it is inconsistent with ‘national policy’.

The proposed Leicestershire County Council provision levels are inadequate to maintain a minimum landbank of 7 years for sand and gravel and 10 years for crushed rock.

#### **Policy CS2**

QPA objects to two aspects of the first bullet point. The provision is inadequate (see comments above) and the MPA cannot “make land available”, they can only make provision for the sub-regional apportionment to be met. Only landowners can make land available and therefore the policy is unsound as it cannot be delivered.

QPA objects to bullet point six as it is implied that the seven and ten year figures are being used as maximum levels. MPS1 refers only to minimum

