

2015



**Leicestershire
County Council**

Leicestershire County
Council

Consultation Statement

1.0 Consultation Statement

- 1.1 As the first stage in the production of the Minerals and Waste Local Plan, the County Council published the following documents in November 2013:
- Leicestershire Minerals and Waste Local Plan: Issues Document;
 - Leicestershire Minerals and Waste Local Plan Review - Sustainability Appraisal incorporating Strategic Environmental Assessment: Scoping Report.
- 1.2. The bodies with contact details listed in Appendix 1 were consulted by email or letter with a request for any comments to be provided by 24th January 2014. The documents, together with a summary leaflet and a response form, were made available on the County's website (www.leics.gov.uk). The consultation exercise was also publicised by means of an advertisement placed in local newspapers.
- 1.3. A total of 70 groups and individuals responded to the Minerals and Waste Issues Consultation document. 28 of the responses were from councils (3 from District Councils; 12 from Parish Councils; 6 from adjoining Councils; and 7 from other councils), 12 from industry (7 from mineral companies and 5 from waste companies), 9 from statutory consultees, 2 from County Council Departments, 14 from other organisations, 2 from landowners and 3 from private individuals. A list of those who responded is set out in Table 1 below.

Table 1: Respondents to the Issues consultation document

Parish/Town Councils/ Meetings	Other Councils	Industry	Public Bodies	Other
Blaby P.C.	Charnwood B.C.	Acorn Recyclers	Coal Authority	British Mountaineering Council
Broughton Astley P.C.	Hinckley & Bosworth B.C.	Air Products	English Heritage	Bowline Climbing Club
Carlton P.C.	North West Leicestershire D.C.	Biffa Waste Services	Environment Agency	Coventry Airport Limited
Frolesworth P.M.	Derbyshire C.C.	Cemex	Forestry Commission	Friends of the Earth
Lutterworth T.C.	Erewash B.C.	Egdon Resources	HSE	Leicester Friends of the Earth
Market Bosworth P.C.	Lincolnshire C.C.	Flying Spares	Highways Agency	Leicestershire Local Access Forum
Measham P.C.	Northamptonshire C.C.	Hanson Building Products	Homes and Communities Agency	Leicestershire Quarries Vision Project
Mountsorrel P.C.	Staffordshire C.C.	Lafarge Tarmac	Natural England	Leicester-Shire & Rutland Sport
Sapcote P.C.	Rutland C.C.	Mineral Products Association	Public Health England	Leicestershire & Rutland Wildlife Trust
Sharnford P.C.	Buckinghamshire C.C.	New Earth Solutions	LCC Green Infrastructure Team	National Farmers Union
Thurlaston P.C.	Cambridgeshire C.C.	UK Coal	LCC Highways	National Forest Charitable Trust
Woodhouse P.C.	Doncaster M.B.	UK Coal Producers		National Forest Company
	Leeds City Council			Ramblers Association
	Redcar & Cleveland B.C.			RSPB
	Surrey C.C.			Freeby Estate
	Warrington B.C.			Mike Shearstone
				Michael Lambert
				Michael Lee
				Philip Sullivan

-
- 1.4. There were some 706 'representations' in all from the above respondents. The reason for the high number of representations received was mainly due to the number of questions posed (61) within the consultation document.
 - 1.5. Six respondents expressed no comments in respect of the issues raised, namely Coventry Airport Limited, Homes and Communities Agency, Doncaster Metropolitan Borough, HSE, Public Health England, and Erewash BC.
 - 1.6. The average number of responses per question was 11. Of the 61 questions, 22 received less than 10 responses, 29 received between 10 and 15 responses, and 8 received more than 15 responses. The questions that elicited the higher number of responses related to the spatial vision and strategic objectives (27 responses), waste sites safeguarding (23), key issues (20), future provision of aggregates (19), reclamation and aftercare (18), woodland (17), extensions to existing sand and gravel sites (17) and non-strategic waste sites (16).
 - 1.7. The comments made in respect of each question and the way in which the Council has responded are set out in Appendix 2.
 - 1.8. The preparation of the Consultation Draft Leicestershire Minerals and Waste Local Plan document has taken into account the comments received on the Issues document.

Appendix 1 – Detailed List of Consultees

Local Government

Leicestershire Local Planning Authorities

Blaby District Council
Charnwood Borough Council

Harborough District Council
Hinckley & Bosworth Borough Council

Melton Borough Council
North West Leicestershire District
Council
Oadby and Wigston Borough Council

Leicestershire Parishes

Blaby District

Aston Flamville Parish Meeting
Blaby Parish Council
Braunstone Town Council
Cosby Parish Council
Countesthorpe Parish Council

Croft Parish Council
Elmesthorpe Parish Council
Enderby Parish Council
Glen Parva Parish Council
Glenfield Parish Council
Huncote Parish Council
Kilby Parish Council

Kirby Muxloe Parish Council
Leicester Forest East Parish Council
Leicester Forest West Parish Meeting
Lubbesthorpe Parish Meeting
Narborough and Littlethorpe Parish
Council
Potters Marston Parish Meeting
Sapcote Parish Council
Sharnford Parish Council
Stoney Stanton Parish Council
Thurlaston Parish Council
Whetstone Parish Council
Wigston Parva Parish Meeting

Charnwood Borough

Anstey Parish Council
Barkby and Barkby Thorpe Parish
Meeting
Barrow upon Soar Parish Council
Beeby Parish Council
Birstall Parish Council
Burton on the Wolds, Cotes and
Prestwold Parish Council
Cossington Parish Council
East Goscote Parish Council
Hathern Parish Council
Hoton Parish Council
Mountsorrel Parish Council
Newtown Linford Parish Council
Queniborough Parish Council
Quorn Parish Council
Ratcliffe on the Wreake Parish Council

Rothley Parish Council
Seagrave Parish Council

Shepshed Town Council
Sileby Parish Council
South Croxton Parish Council
Swithland Parish Meeting

Syston Town Council
Thrussington Parish Council
Thurcaston and Cropston Parish Council
Thurmaston Parish Council
Ulverscroft Parish Meeting
Walton on the Wolds Parish Council
Wanlip Parish Meeting
Woodhouse Parish Council
Wymeswold Parish Council

Rearsby Parish Council

Harborough District

Allextton Parish Meeting
Arnesby Parish Council
Ashby Magna Parish Council
Ashby Parva Parish Meeting
Billesdon Parish Council
Bitteswell Parish Council

Blaston Parish Meeting
Bringham, Drayton & Nevill Holt Parish Meeting
Broughton Astley Parish Council
Bruntingthorpe Parish Council
Burton Overy Parish Council
Carlton Curlieu Parish Meeting
Cathorpe Parish Meeting
Claybrooke Magna Parish Council
Claybrooke Parva Parish Council
Cotesbach Parish Council
Cranoe Parish Meeting
Dunton Bassett Parish Council
East Langton Parish Council
East Norton Parish Meeting
Fleckney Parish Council
Foxton Parish Council
Frisby Parish Meeting
Frolesworth Parish Meeting
Gaulby Parish Meeting
Gilmorton Parish Council
Glooston Parish Meeting
Goadby Parish Meeting
Great Bowden Parish Council
Great Easton Parish Council
Great Glen Parish Council
Hallaton Parish Council
Horninghold Parish Meeting

Houghton on the Hill Parish Council
Hungarton Parish Council
Husbands Bosworth Parish Council
Illston on the Hill Parish Council
Keyham Parish Meeting
Kibworth Beauchamp Parish Council
Kibworth Harcourt Parish Council
Kimcote and Walton Parish Council
Kings Norton Parish Meeting

Knaptoft Parish Meeting
Laughton Parish Meeting
Leire Parish Council
Little Stretton Parish Meeting
Loddington and Launde Parish Meeting
Lowesby and Cold Newton Parish Meeting
Lubenham Parish Council
Lutterworth Parish Council
Marefield Parish Meeting
Medbourne Parish Council
Misterton with Walcote Parish Council
Mowsley Parish Meeting
North Kilworth Parish Council
Noseley Parish Meeting
Owston and Newbold Parish Meeting
Peatling Magna Parish Meeting
Peatling Parva Parish Meeting
Rolleston Parish Meeting
Saddington Parish Meeting
Scraptoft Parish Council
Shawell Parish Council
Shearsby Parish Council
Skeffington Parish Meeting
Slawston Parish Meeting
Smeeton Westerby Parish Council
South Kilworth Parish Council
Stockerston Parish Meeting
Stoughton Parish Council
Swinford Parish Council
Theddingworth Parish Council
Thorpe Langton Parish Meeting
Thurnby and Bushby Parish Council
Tilton on the Hill and Halstead Parish Council
Tugby and Keythorpe Parish Council
Tur Langton Parish Council
Ullesthorpe Parish Council
Welham Parish Meeting
West Langton Parish Meeting
Westrill and Starmore Parish Meeting
Willoughby Waterleys Parish Council
Wistow and Newton Parish Meeting

Hinckley & Bosworth Borough

Bagworth & Thornton Parish Council
Barlestone Parish Council
Barwell Parish Council
Burbage Parish Council
Cadeby Parish Council
Carlton Parish Council
Desford Parish Council
Earl Shilton Town Council
Groby Parish Council
Higham on the Hill Parish Council
Market Bosworth Parish Council
Markfield Parish Council

Nailstone Parish Council
Newbold Verdon Parish Council
Osbaston Parish Council
Peckleton Parish Council
Ratby Parish Council
Shackerstone Parish Council
Sheepy Parish Council
Stanton under Bardon Parish Council
Stoke Golding Parish Council
Sutton Cheney Parish Council
Twycross Parish Council
Witherley Parish Council

Melton Borough

Ab Kettleby Parish Council
Asfordby Parish Council
Barkston, Plungar and Redmile Parish Council
Belvoir Parish Council

Bottesford Parish Council
Broughton and Old Dalby Parish Council

Buckminster Parish Council
Burton and Dalby Parish Council
Clawson, Hose and Harby Parish Council
Croxton Kerrial and Branston Parish Council
Eaton Parish Council

Freeby Parish Council

Frisby on the Wreake Parish Council

Gaddesby Parish Council
Garthorpe Parish Council
Grimston, Saxelbye and Shoby Parish Council
Hoby, Rotherby, Ragdale and Brooksby Parish Council
Kirby Bellars Parish Council
Knossington and Cold Overton Parish Council
Scalford Parish Council
Somerby Parish Council
Sproxtton Parish Council

Stathern Parish Council

Twyford and Thorpe Satchville Parish Council

Waltham on the Wolds and Thorpe
Arnold Parish Council
Wymondham Parish Council

North West Leicestershire District

Appleby Magna Parish Council
Ashby de la Zouch Town Council

Ashby Woulds Town Council
Belton Parish Council
Breedon on the Hill Parish Council

Castle Donington Parish Council
Charley Parish Council
Chilcote Parish Meeting

Lockington-Hemington Parish Council
Long Whatton and Diseworth Parish Council
Measham Parish Council
Normanton le Heath Parish Meeting
Oakthorpe, Donisthorpe and Acresford Parish Council
Osgathorpe Parish Council
Packington Parish Council
Ravenstone and Snibston Parish Council

Coleorton Parish Council
Ellistown and Battleflat Parish Council
Heather Parish Council
Hugglescote and Donington le Heath
Parish Council
Ibstock Parish Council
Isley cum Langley Parish Meeting
Kegworth Parish Council

Snarestone Parish Council
Staunton Harold Parish Meeting
Stretton en le Field Parish Meeting
Swannington Parish Council

Sweepstone Parish Council
Whitwick Parish Council
Worthington Parish Council

Leicestershire Parish Councils with no contact details

Bardon Parish Meeting (North West Leicestershire)
Bittesby Parish Meeting (Harborough)
Gumley Parish Meeting (Harborough)
Shangton Parish Meeting (Harborough)
Stonton Wyville Parish Meeting (Harborough)
Withcote Parish Meeting (Harborough)

Adjoining Planning Authorities

Corby District Council
Daventry District Council
Derbyshire County Council
East Northamptonshire District Council

East Staffordshire Borough Council
Erewash Borough Council
Kettering Borough Council
Leicester City Council
Lichfield District Council
Lincolnshire County Council
Newark and Sherwood District Council

Northamptonshire County Council
North Warwickshire Borough Council
Nottinghamshire County Council
Nuneaton and Bedworth Borough
Council
Rugby Borough Council
Rushcliffe Borough Council
Rutland County Council
South Derbyshire District Council
South Kesteven District Council
Staffordshire County Council
Warwickshire County Council

Adjoining Parishes

Derbyshire

Aston on Trent Parish Council
Breaston Parish Council
Castle Gresley Parish Council
Draycott and Church Wilne Parish
Council
Elvaston Parish Council
Hartshorne Parish Council
Linton Parish Council
Lullington Parish Meeting
Melbourne Parish Council
Netherseal Parish Council

Overseal Parish Council
Rosliston Parish Council
Sawley Parish Council
Shardlow and Great Wilne Parish
Council
Smisby Parish Council
Stanton by Bridge Parish Meeting
Ticknall Parish Council
Weston on Trent Parish Council
Woodville Parish Council

Lincolnshire

Allington Parish Council
Colsterworth, Gunby and Stainby Parish Council
Denton Parish Council

Long Bennington Parish Council
Sedgebrook Parish Council
Skellingthorpe Parish Council

Skillington Parish Council
South Witham Parish Council

Stoke Rochford and Easton Parish Council
Woolsthorpe by Belvoir Parish Council
Wyville cum Hungerton Parish Council

Northamptonshire

Ashley Parish Council
Brampton Ash Parish Council
Braybrooke Parish Council
Clay Coton Parish Meeting
Clipston Parish Council
Cottingham Parish Council
Dingley Parish Council
East Carlton Parish Council
East Farndon Parish Council
Great Oxendon Parish Council
Gretton Parish Council

Lilbourne Parish Council
Marston Trussell Parish Meeting
Middleton Parish Council
Rockingham Parish Meeting
Sibbertoft Parish Council
Stanford on Avon Parish Meeting
Sulby Parish Meeting
Sutton Bassett Parish Meeting
Welford Parish Council
Weston by Welland Parish Council
Wilbarston Parish Council

Nottinghamshire

Alverton and Kilvington Parish Meeting
Colston Bassett Parish Council
Costock Parish Council
East Leake Parish Council
Elton on the Hill Parish Meeting
Flawborough Parish Meeting
Gotham Parish Council
Granby cum Sutton Parish Council
Hickling Parish Council
Kingston on Soar Parish Council
Kinoulton Parish Council
Langar cum Barnestone Parish Council
Normanton on Soar Parish Council

Orston Parish Council
Ratcliffe on Soar Parish Meeting
Rempstone Parish Council
Stanford on Soar Parish Council
West Leake Parish Council
Upper Broughton Parish Council
Staunton Parish Meeting
Sutton Bonington Parish Council
Thrumpton Parish Meeting
Whatton in the Vale Parish Council
Widmerpool Parish Council
Willoughby on the Wolds Parish Council
Wysall and Thorpe in the Glebe Parish Council

Rutland

Ashwell Parish Council
Barrow Parish Meeting
Barleythorpe Parish Meeting
Belton in Rutland Parish Council

Market Overton Parish Council
Oakham Town Council
Ridlington Parish Council
Stoke Dry Parish Meeting

Braunston in Rutland Parish Council
Brooke Parish Meeting
Caldecott Parish Council
Greetham Parish Council
Langham Parish Council
Lyddington Parish Council

Stretton Parish Council
Teigh Parish Meeting
Thisleton Parish Meeting
Uppingham Town Council
Wardley Parish Meeting
Whissendine Parish Council

Staffordshire

Clifton Campville with Thorpe Constantine Parish Council

Warwickshire

Atherstone Town Council
Austrey Parish Council
Bentley and Merevale Parish Council
Burton Hastings Parish Council

Caldecote Parish Council
Churchover Parish Council
Clifton upon Dunsmore Parish Council
Copston Magna Parish Council
Grendon and Dordon Parish Council
Harborough Magna Parish Council
Hartshill Parish Council

Mancetter Parish Council
Monks Kirby Parish Council
Newton and Biggin Parish Council
Newton Regis, Seckington and No
Man's Heath Parish Council
Pailton Parish Council
Polesworth Parish Council
Stretton Baskerville Parish Council
Willey Parish Council
Withybrook Parish Council
Wolvey Parish Council
Wibtoft Parish Council

Adjoining Parish Councils with no contact details

Beaumont Chase Parish Meeting (Rutland)
Leighfield Parish Meeting (Rutland)

Other Waste Planning Authorities

Birmingham City Council
Buckinghamshire County Council
Cambridgeshire County Council
Cheshire West and Chester Council
Coventry City Council
Derby City Council
Doncaster Metropolitan Borough
Council
Dudley Metropolitan Borough Council
Essex County Council
Kent County Council
Knowsley Metropolitan Borough Council
Lancashire County Council
Leeds City Council

Middlesbrough Borough Council
North Lincolnshire Council
Nottingham City Council
Reading Borough Council
Redcar and Cleveland Borough Council
Sandwell Metropolitan Borough Council
Sheffield City Council

Stoke-on-Trent City Council
Surrey County Council
Walsall Metropolitan Borough Council
Warrington Borough Council
Wolverhampton City Council
Worcestershire County Council

Government Bodies, Organisations, and Departments

Statutory Consultees

Civil Aviation Authority	Leicester and Leicestershire Enterprise Partnership
Coal Authority	Leicestershire Police and Crime Commissioner
English Heritage	Local Nature Partnership
Environment Agency	Natural England
Health Protection Agency	Network Rail
Highway Authority	NHS Leicester and Leicestershire Area Team
Highways Agency	Office of Rail Regulation
Homes & Communities Agency	

Leicestershire County Council Consultees

Archaeology, Ecology and Geology	Public Rights of Way
Chief Executive (Community Planning)	Waste Management
Green Infrastructure	

Other Government Consultees

British Geological Survey	Leicestershire Fire and Rescue Service
Department for Business, Innovation and Skills	Leicestershire Police
Department for Environment, Food and Rural Affairs	Leicestershire Together
Department of Energy and Climate Change	Loughborough University
Forestry Commission	Ministry of Defence
Health and Safety Executive	Sport England
Leicestershire & Rutland Association of Parish and Local Councils	

Non Governmental Bodies

Utilities

Anglian Water
British Telecommunications
National Grid Company

Severn Trent Water
Western Power Distribution

Industry

1st Choice Skip Hire
A C Shropshire
A E Burgess
Acorn Recycling
Acresford S&G
Aggregate Industries
Air Products
ALP Ambrose
Andrew Caton
Andrew Granger
Anthony Northcote Planning
Architects Co-Partnership
Arkwright Hill Farm
Augean
BAA
Bakers Waste
Barton Wilmore
Beech Tree Farm, Sproxton
Bellway Homes
Berry Bros
Biffa
Biogen Greenfinch
Bloor Homes
Breedon Aggregates
British Ceramic Confederation
British Gypsum
Browne Jacobson
Bullimores
C. Walton Ltd
Cannon Hygiene
Casepak
Cemex
Charis Consultancy
Charles Brown & Son
Charnwood Forest Brick
CoalPro
Colliers CRE
Cosby Spinneys Farm
David Jarvis
David L Walker Limited

Heaton Planning
Hillcrest Limited
Hinckley Scrap Metals Ltd
Holwell Works
Hughes Craven
Hull & Sons
Ibstock
iGas
Intercare
J & A Young (Leicester) Ltd
J & F Powner
J M Clarke (Welland Waste)
J P & P Bailey (Wiggs Farm)
J10 Planning
JH Walter
King West
Kings Hill Cremations
Labwaste
Lafarge-Tarmac
LSPS
Marriott Hardcastle
Mather Jamie
Melton Waste Recyclers
Merriman
Mick George Limited
Midland Quarry Products
Midland Skip Hire
Mineral Products Association
Mineral Surveying Services
Mr Lovatt, Sutton Lodge Farm
New Earth Solutions
Osiris
Planters
R S Properties
Robert Doughty
Roger Tym
RPS Planning
Savills
Scott Wilson
Silverdell

De-Pack
Dickerson Group
Direct Car Spares
DLP Planning Consultants
DTZ Pida Consulting
E.W.Middleton & Sons
East Midlands Aggregates Working
Party
East Midlands Metals
Egdon Resources UK Ltd
Enderby Metals
Ensor Holdings
Eurokey
F P McCanns
Fairhurst
FCC Environmental (formerly WRG)
Fisher German (updated 08/03/12)
Flying Spares
FOCSA
Geoplan
Gill Pawson
Hanson
Hanson Brick

SITA
SLR
Smith Stuart Reynolds
Soars Lodge Farm (W.T.Clarke)
Stephen Bowley Consultancy
Strutt and Parker
Tapton Estates

Taylors Skip Hire
Tom Toon & Daughters
UK Coal
Vellams Metals
Veolia
Veolia 2
Wanlip S & G
Wastecycle
Wavin
Wigston Car Breakers
William Davis
Williams Recycling
Wimpey
WYG Group

Other Consultees

Campaign to Protect Rural England
Canal and Rivers Trust
County Land & Business Association
Coventry Airport
Design Council
East Midlands Airport
Fields in Trust
Leicester Friends of the Earth
Leicestershire Asian Business
Association
Leicestershire Bridleways
Leicestershire Business Voice
Leicestershire Footpath Association
Leicestershire Wildlife Trust

Loughborough Friends of the Earth
Mr S Leary
National Farmers Union
National Federation of Builders
National Forest
National Forest Charitable Trust
Nature after Minerals
Nuneaton Friends of the Earth
Open Spaces Society

Ramblers Association
Royal Society for the Protection of Birds
Woodland Trust

Appendix 2 – Comments Received on Issues Document (November 2013) and Council's Responses

Organisation	Comments
General Comments	
Coventry Airport Limited	As there is no impact on aviation safety at the airport or its Aerodrome Traffic Zone Coventry Airport Limited has nothing to add to this review.
Homes and Communities Agency	No comments.
Doncaster Metropolitan Borough	It appears that only 0.01% (82 tonnes) of the sand and gravel produced in your area found its way to the Yorkshire and Humber region during 2009. The impact on either your plan or our plan would therefore be minimal. I therefore do not wish to make any additional comments.
HSE	No comments.
Public Health England	No specific comments to make.
Coal Authority	We do not set out any views on Questions 2, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14 (although we support the extraction of fireclay associated with coal operations), 15, 16 as these relate to minerals types or issues which are not of direct interest to The Coal Authority. In addition The Coal Authority has no comments on Questions 24 to 44 relating to Waste proposals. It will of course be necessary to consider mineral safeguarding and the presence of mining legacy in any sites allocated for Waste under Questions 40, 41 or 43. The Coal Authority has no strong views on Questions 46, 47, 48, 50, 51, 52, 53 and 54 relating to development management issues and Questions 57, 58, 59, 60 and 61 relating to restoration. The NPPF has not changed most of the issues associated with development management and restoration, and as such existing Core Strategy policies will remain broadly acceptable.
Erewash BC	No comments
Mineral Products Association	In general we believe that the MWLP should not repeat national policies or policies already adopted in other parts of the development plan but only mention those subjects which are of particular relevance to Leicestershire, or are not covered by either national policy or other parts of the development plan, or where more detail is justified. We would

	<p>hope that if this approach is adopted it will considerably reduce the size of the document. Consequently, we believe that the number of development management policies should be heavily edited and those that remain cross referenced with NPPF and other parts of the development plan in order to secure the most economic use of policy statements. Verbiage should be studiously avoided.</p>
English Heritage	<p>There have been a number of planning changes locally and nationally since we last provided comments on the previous Core Strategy documents. The National Planning Policy Framework has been published, which sets out clear requirements for Local Plans with regards to the historic environment. The Local Plan as a whole should be able to demonstrate that it sets out a positive strategy for the historic environment. Our general guidance on Local Plans can be found online at www.helm.org.uk/guidancelibrary/heritage-in-local-plans.</p> <p>With specific regard to minerals, the historic environment is of considerable relevance to minerals planning for a number of reasons. Ensuring that the impacts of current and future extraction avoid harming heritage assets wherever possible is a key aim, along with opportunities to enhance the historic environment through appropriate restoration. Maintaining a supply of building and roofing stone for conservation purposes is another key aim, along with the objective to safeguard the industrial heritage of mineral exploitation. Our 2008 guidance document on Mineral Extraction and the Historic Environment sets out English Heritage's position on minerals planning.</p>
<p>Council's Response</p> <p>Attempts have been made to reduce the scale of the draft consultation document through the amalgamation of some development management policies. But, it must be remembered that this emerging Local Plan is seeking to cover the topics previously addressed by two separate documents.</p> <p>Protection of the historic environment is addressed through a specific policy in the development management chapter.</p>	
<p>Question 1: Plan Period</p>	
Coal Authority	<p>The Coal Authority would agree that the Local Plan should cover the period to 2031, this will give the plan the relevant 15 year timeframe from the likely date of adoption as the NPPF requires.</p>
Mountsorrel Parish Council	<p>Crushed rock production is a capital intensive industry and long-term, with a typical >25 years lifetime. Planning should take place on a similar timescale and Local Mineral and Waste Plans should have a minimum period of 15 years and a forward look to 25 years.</p>
Leicestershire Quarries Vision Project	<p>Because of the longevity of the hard rock quarry operations in Leicestershire, the time horizon for the Minerals part of the plan should be as long as practicable and should be periodically reviewed in the light of developments.</p>
LCC Highways	<p>Agree with 2031. Broadly aligns with other development plan documents.</p>
Charnwood Borough Council	<p>Charnwood's Core Strategy Local Plan which was submitted to the Secretary of State in December 2013 has an end date of 2028, and while it would be preferable to have the same end date for the two plans we accept that it is inevitable that there will be differences, as there is between Charnwood's Core Strategy and other Leicestershire District Council's core strategies. An end date of 2031 seems to provide a reasonable time horizon.</p>

New Earth Solutions	2031 would seem sensible given the pace of change in waste composition arising from developments in product packaging materials and associated waste recycling / treatment technologies.
Biffa Waste Services Ltd	Given that there will be ongoing monitoring and review of the Plan then this is a sensible time period to cover.
LCC Green Infrastructure Team	Yes, the MWLP should cover the period to 2031.
Lafarge Tarmac	Yes we agree that 2031 is an appropriate period for the Minerals and Waste Local Plan to cover.
UK Coal Producers	We agree that 2031 is a sensible time horizon.
Cemex	Agree.
Mineral Products Association	We believe the plan period for this review should be to 2031.
Hanson UK	There is no reason why the Plan Period should not be extended as proposed, to 2031, however the Minerals and Waste Site Allocations DPD must be re-commenced in light of such an extension. This has particular relevance where a site allocation in the adopted plan may have previously been exhausted between 2021 and 2031 and would otherwise have been promoted into the next plan period. In writing in respect of the UK brick industry, this issue must take account of NPPF paragraph 146 which requires MPAs to plan for a steady and adequate supply of industrial minerals. Hanson Building Products will need to promote site allocations within the county over and above existing permitted reserves, to enable uninterrupted supply to established brickworks facilities.
Blaby Parish Council	Yes.
Council's Response (Qu.1): The plan covers the period to 2031 and incorporates allocated sites rather than in a separate document.	
Question 2: Key Issues	
Northamptonshire County Council	Provision of aggregates and the waste arisings / capacity requirements should be updated (as per para 2.6).
Northamptonshire County Council	(Q46 to 55) - it is for the mpa to determine whether additional policy coverage is required to address local circumstance and address any potential policy gaps between the NPPF and local plan.
Rutland County Council	Waste arisings/capacity requirements should be updated (as per para 2.6).

Rutland County Council	(Q46 to 55) - It is for the local planning authority to determine whether additional policy coverage is required to address local circumstance and address any potential policy gaps between the NPPF and the local plan.
Environment Agency	Success of the existing Waste Core Strategy in pushing waste up the waste hierarchy and utilising waste as a resource should be reviewed. Results of annual monitoring of the current plans performance against indicators and targets should be considered as a key part of this review. Given the importance that water has, particularly in the sand and gravel sector; I would have thought you would have gone some way in explaining how you consider water to be important. I think it merits its own brief section within this document and not just refer to it (water) in other existing policies. This will go some way to meeting the climate change provision (see response to question 47). It is difficult to highlight specific issues as there are no new sites highlighted within this document. You've identified a short fall in sand and gravels, but have not identified any new sites other than extending current sites which you highlight will only last in the short term.
British Mountaineering Council	The British Mountaineering Council (BMC) agrees that a particular issue for review should be the strategy for the restoration of mineral and landfill sites. The ministerial foreword to the NPPF includes the following: "Our natural environment is essential to our wellbeing, and it can be better looked after than it has been. Habitats that have been degraded can be restored. Species that have been isolated can be reconnected. Green Belt land that has been depleted of diversity can be refilled by nature - and opened to people to experience it, to the benefit of body and soul." The BMC recognises that the extensive worked out hard rock quarries in Leicestershire can play a significant role in enabling people to achieve these benefits and that creative and effective restoration planning and delivery is required to achieve it.
Leicestershire Quarries Vision Project	Transport is a key issue in aggregate production and distribution, particularly in Leicestershire. It is mentioned in the text later, but minerals transport probably deserves to be a key issue.
Sharnford Parish Council	We would wish to see more consistency and clarity throughout the whole document. As in previous Policy Statements emanating from the County Council there are a number of proposals that are either in conflict with each other according to where they appear in the document or are so loosely constructed as to make any interpretation entirely at the whim of whoever is called upon to apply them at some future date. We believe that a policy statement should be consistent throughout and incapable of varying interpretation. As a Parish Council we should be able to assess proposed development against a set of criteria in the knowledge that Planning Authorities are working to the same interpretation of those criteria.
New Earth Solutions	New Earth Solutions Group is disappointed that LCC are not proposing to revisit the locational strategy or include site specific allocations for recovery facilities. Whilst the locational strategy set out in the current Joint Waste Core Strategy has successfully delivered HWRC's, bulking / transfer stations and dry-recycling facilities close to the main urban areas, it has however failed to deliver significant additional recovery capacity in either the main urban areas or indeed the wider plan area - this is aptly highlighted in appendix 1 of the Issues Document. The lack of available recovery capacity has led to the unnecessary disposal of residual waste to landfill, as well as the export of waste for treatment outside of the plan area, in some cases travelling significant distances. This does not sit comfortably with the

	<p>guidance set out in the NPPF, PPS10 or the recently published Waste Plan. The main urban areas, which are by definition densely populated, are not necessarily the most appropriate location for new recovery facilities owing to potential amenity conflicts. Indeed, in one instance Leicestershire County Council refused to grant permission for the continued operation of a 'dirty MRF' within the established area citing amenity concerns. The withdrawal of the proposed Waste Site Allocations document from Examination only served to highlight the difficulty in identifying and delivering suitable sites. The issues document explains that the emerging Waste Local Plan will only cover Leicestershire (Leicester integrating waste policies into their own Local Plan). Notwithstanding the duty to co-operate, it would seem sensible to revisit the locational strategy in the face of the change in geographic coverage.</p>
Biffa Waste Services Ltd	<p>One of the key issues arising from this consultation is the fact that the revised plan excludes the boundary of Leicester City Council, the most densely populated area in the middle of the County's administrative boundary. Leicester City already has arrangements in place for the long term management of its own municipal waste though a contract with Biffa but there are still significant quantities of industrial and commercial waste produced in the city that require management. We consider it preferable that Leicestershire and Leicester produce a single plan. This would ensure a coherent approach to the specialist areas of minerals and waste planning. Reference is made in paragraph 2.7 that the "County Council is able to make a local decision on its provision of land won aggregates and waste management facilities, provided the decision is based upon evidence that is adequate, up to date and relevant and takes account of the duty to co-operate". The only other reference to the duty to co-operate appears in paragraph 5.33 in respect of waste movements. We are sure that the two authorities will co-operate on the issues of minerals and waste planning to ensure that if the two separate plans operate together however, if two separate plans are to be produced for Leicestershire and Leicester the we consider the plan should present very clearly from the outset evidence of action taken to ensure the duty to co-operate has been met.</p>
Derbyshire County Council	<p>It would be helpful if the document were to include a more explicit reference to the 'Duty to Cooperate', which is a key element of the Government's proposals for strategic working introduced under the 2011 Localism Act, following the abolition of regional planning. This requires that planning authorities must 'engage constructively, actively and on an on-going basis' in the preparation of development plans when related to a strategic matter. The Plan will need to demonstrate that all strategic matters have been identified and addressed that are of cross-boundary significance. As a neighbouring Mineral Planning Authority, under the 2011 Localism Act's 'Duty to Co-operate' requirement, Derbyshire County Council looks forward to working with Leicestershire County Council on all aspects of its Minerals and Waste Local Plan.</p>
Lafarge Tarmac	<p>The level of minerals supply, in particular aggregates, is not included within para 2.11, however, the levels of aggregate provision are discussed within main body of the consultation document. We are concerned that LCC are not seeking to revise their position on the locational strategy for waste management facilities. The existing approach within the Waste Core Strategy has failed to deliver a sustainable approach to waste management within the County. Waste management facilities within the urban area have failed to come forward during the current Plan period or have been resisted on amenity grounds. The exclusion of Leicester City from the 'Plan' provides an opportunity to revisit the strategic approach for the location of waste management facilities and to focus on delivering a broad range of</p>

	<p>sustainable waste management facilities.</p> <p>There is an apparent lack of waste recovery capacity within the County and we recommend that the MWLP addresses this issue. The Plan should acknowledge within the capacity figures that there will be an overlap of facilities, as waste is treated through the waste hierarchy and multiple counting of treatment facility capacity figures may result in the County considering that there is more capacity than actually available.</p>
Leicester Friends of the Earth	<p>Our general comments relate to the importance of considering the climate change impact of any minerals or waste activity. Currently there is an emphasis on reducing the contribution of waste management to climate change. However the exploitation of oil, gas and unconventional hydrocarbons all have climate change impacts which should be taken into consideration. We also believe that greater emphasis should be given to the effect of minerals extraction on ground water. This is particularly important in the case of the development of shale gas through hydraulic fracturing which has been demonstrated to have negative effects on the safety and supply groundwater.</p>
UK Coal Producers	<p>We agree, there are no other major issues to include.</p>
Leicestershire & Rutland Wildlife Trust	<p>We can see no mention of geodiversity conservation. This should be addressed. (May we also point out that there are many more Regionally Important Geological Sites in Leicestershire than the 15 stated on page 9).</p>
Carlton Parish Council	<p>We think it is ridiculous for Leicester City to have a different and separate Waste Local Plan, and strongly recommend that the two policy documents be combined.</p>
RSPB	<p>The Leicestershire Minerals and Waste Local Plan should identify biodiversity as a key issue. Suggested wording for this key issue is: "How mineral development will deliver a net-gain in biodiversity - primarily through the landscape-scale creation of priority habitats on restored mineral sites - such that it makes a significant contribution to establishing a coherent and resilient ecological network."</p> <p>The minerals industry is uniquely placed to help halt and reverse the country's massive - and ongoing - decline in biodiversity. For example, mineral site restoration on its own has the potential to deliver the national habitat creation targets for nine priority habitats. Biodiversity has risen up the political agenda in recent years, with the publication of several key documents. Biodiversity is also a key issue in the National Planning Policy Framework.</p>
Mineral Products Association	<p>We do not believe that there are any additional issues that need to be covered by the review. However, we question the desirability of including a consideration of whether there should be "additional measures should be adopted to protect residential amenity, such as buffer zones." In general we believe that rigidly set buffer zones are inappropriate and that any standoffs to mineral working should be determined at the time an Environmental Assessment is carried out.</p>
Hanson UK	<p>Due to the economic downturn, many industrial facilities have been mothballed or closed, leading to a removal of the link between on site mineral resources, and on site production facilities. Hanson Building Products would like the policy process to consider the importance of securing the ability to sever such links to provide greater flexibility. This element is consistent with the Government and the County's pursuance of mineral safeguarding.</p>

Blaby Parish Council	Additional key issues: Environmental Impact of Mineral and Waste Operations.
Council's Response (Qu.2) The plan includes an update of requirements for the provision of aggregates. The County's Annual Monitoring Reports identify the capacity of new waste management facilities and progress being made to push waste up the waste hierarchy. This information has been used to help create the Waste Needs Assessment and to review the success of existing policies and inform whether any policy changes are appropriate. Leicester City has chosen to produce a Local Plan which will include waste. The Authority will actively work with the City Council to ensure strategic matters are planned for. A separate 'Duty to Cooperate' document has been prepared. Even with the exclusion of Leicester City the environs around the City but within the County remain the largest centre of population in the County. Therefore, the general stance of the waste spatial strategy remains relevant. The plan addresses issues related to restoration, transportation, oil and gas, climate change, geodiversity conservation, biodiversity, environmental impact, and the provision of brickclay. It is not considered necessary to include a specific section on water within the plan. It is not proposed to identify specific buffer zones to protect residential amenity.	
Question 3: Spatial Vision and Strategic Objectives	
Northamptonshire County Council	Agree; also remove reference to regional targets in waste objective 4. Some of the minerals and waste objectives are similar / related and could be combined to form one set of objectives. Opportunity to align objectives more closely with NPPF re: historic environment/assets, flood risk, climate change.
Rutland County Council	Spatial vision – waste. Support spatial vision wording 'sustainable range of waste facilities with capacity equal to the amount of waste generated and requiring management within Leicestershire and Leicester'.
Rutland County Council	Strategic objectives - agree, also remove ref to regional targets in waste objective 4.
Environment Agency	We agree that the Spatial Vision and Strategic Objectives should be amended as suggested to reflect the revocation of the East Midlands Regional Plan and exclude the City. The vision is meant to be an aspirational statement and we believe that it should take the opportunity to promote the waste sector and highlight the potential benefits that a well-designed and well planned waste facility can bring economically and environmentally.
UK Coal	An additional strategic objective for minerals development should be included to make reference to the importance of maintaining jobs in the minerals sector which is reflected in para.144 of the NPPF.
Coal Authority	The Coal Authority agrees that the spatial vision and strategic objectives set out in the Core Strategy remain broadly fit for purpose and can be rolled forward with the amendments proposed, i.e. removing reference to the former East Midlands Regional Plan and the City of Leicester.
British Mountaineering	Within the Minerals and Waste Core Strategies, strategic objective for minerals development No.7 is: "To promote the delivery of measures for environmental, recreational, economic and community gain in mitigation or compensation for

Council	<p>the effects of mineral development where possible."</p> <p>It is suggested that objective No.8 should reflect this by confirming the provision for recreation as a component of appropriate after use. This is supported by objective No.9 which seeks to compliment and support the wider strategies for the Minerals Development Framework area within which recreation is a strategic priority.</p>
Mountsorrel Parish Council	<p>Whilst the Objectives should be updated to reflect the changed regional planning structure Leicestershire is not an 'island' but remains part of a developing region, which requires its hard rock resources. These resources will be used locally, regionally and nationally. Demand is likely to increase most sharply from the fastest growing SE Region. Changing the regional planning structure does not change the economics of hard rock extraction.</p>
Natural England	<p>Natural England would like to see a specific Strategic Objective for the protection and enhancement of the natural environment which recognises environmental systems and landscape character. The objective should ensure that minerals working or waste development do not damage or destroy the County's existing environmental and natural assets and also enhance existing and planned green infrastructure networks and to support the identified landscape character of the county.</p> <p>We also consider that the objective which covers restoration includes the aspiration to provide a net gain in biodiversity to reflect the wording in the National Planning Policy Guidance (NPPF) and also that the restored areas are subsequently managed and maintained.</p>
Leicestershire Quarries Vision Project	<p>Since "sustainability" is critical, it is probably worth mentioning what you believe it should mean. One definition is: "Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs." although it ducks the issue of the meaning of "future". One problem with aggregate minerals is that once removed, they generally cause a change in landform and often leave a void. This can be described as sustainable if the void meets a "need" that future generations will have, and the restoration objective should include this as a concept. In order to meet the sustainability requirement, all extraction sites have to have restoration plans and be continuously restoring worked land. Suggest adding after "reclaimed at the earliest opportunity" the phrase ", ideally continuously with extraction," so as to avoid the industry creating an industrial landscape as at Bardon Hill and saying that they will restore it after operations have ceased. It is the acceptance of this that has left us with so many unrestored abandoned quarries in Charnwood.</p>
Highways Agency	<p>In response to the strategic objectives listed in the document, the HA welcomes the Council's aim to encourage opportunities for sustainable means of transporting minerals other than by road. The HA acknowledges that minerals are a finite natural resource and can only be worked where they are found, thus necessitating the need for sustainable measures to be considered as a means of transporting minerals.</p>
Highways Agency	<p>The HA welcomes the strategic objectives for waste to be transported in a more sustainable manner and for waste management facilities to be located in areas which minimise the distances that waste is being transported. This would serve to reduce the need to travel and minimise the impacts of waste related trips on the SRN.</p>
Charnwood Borough Council	<p>We recognise the necessity of making changes to the way in which the Regional Plan is referred to although it is important to distinguish between the Regional Plan itself and the evidence base which underpins it. For example, we understand that the East Midlands Aggregates Working Party which has local authority and business representation has</p>

	continued its work. There appears to be a slight inconsistency in the way national need for minerals is referred to in the Minerals Core Strategy Spatial Vision compared to the Strategic Objectives. This is clearly a key issue in view of the strategic importance of mineral reserves in the County. It is noted that the Spatial Vision and Strategic Objectives raise the possibility of deleting reference to Leicester's municipal waste management requirements. While this intention may reflect the fact that separate plans are being prepared it is nevertheless the case that this relationship is a key issue for the plan. The importance of joint work with the City Council to plan and manage waste should be referred to.
New Earth Solutions	New Earth agrees that the spatial vision and strategic objectives need to be amended to reflect to abolition of the RSS. New Earth supports the reference to 'timely delivery' in strategic objective 2, but believes that the Plan, as drafted, is ill equipped to deliver additional recovery capacity. There may also be scope to rationalise or consolidate some of the strategic objectives. New Earth would encourage recognition of the increasingly sophisticated tiers of recovery and the increasing integration between recovery operations and the manufacture of end products within strategic objective [5]. New Earth also believe that strategic objective [7] would benefit from the addition of '... meets the needs of industry' as well as communities.
Biffa Waste Services Ltd	In general we agree that the Spatial Visions and Strategic Objectives should be amended although we would prefer, as set out above, that a joint plan on waste be produced by the County and the City. A further objective should be included that seeks to protect existing and future waste management facilities from encroachment by other development. We recognise that this issue is dealt with later in the document but its importance should be elevated to that of a Strategic Objective.
LCC Green Infrastructure Team	Agree that spatial vision and strategic objectives should be amended as suggested. At 3.14 suggest that reference is made to Charnwood Forest Regional Park. At 3.15 I'm not sure that RIGS are still correctly referred to as RIGS. At 3.16 I think 'historic parks and gardens' should maybe read 'registered parks and gardens'.
National Forest Company	Both Core Strategies contain a Strategic Objective to compliment and support strategies such as The National Forest. The National Forest requests that such support is repeated within a new Strategic Objective.
Lafarge Tarmac	We agree that the Spatial Vision and Strategic Objectives are amended as suggested in Para 3.27. However, we feel that the existing strategic approach to waste is ill equipped to deliver these objectives and has failed to do so to date. The plan needs to acknowledge that there are tiers of waste treatment as recycling and recovery operations become more specialised.
Staffordshire County Council	We agree with the amendments as proposed in paragraph 3.27 and in particular support the Plan's continued aim to make sufficient provision to meet national, regional and local requirements for all minerals.
UK Coal Producers	Part A - Yes; Part B - No.
Leicestershire & Rutland Wildlife	Part 1: Yes.

Trust	
Cemex	Agree.
RSPB	<p>Biodiversity should be a key issue in the Plan. Both the Spatial Vision and the Strategic Objectives should be amended to reflect the importance of this issue and the associated requirements of the NPPF.</p> <p>The Vision should specifically require a net-gain in biodiversity.</p> <p>The objectives do not capture the potential scale of opportunity that mineral development provides for delivering a net-gain in biodiversity. There should be a stand-alone Strategic Objective to address this issue: "To deliver a net-gain in biodiversity - primarily through the landscape-scale creation of priority habitats on restored mineral sites - such that it makes a significant contribution to establishing a coherent and resilient ecological network."</p> <p>The Vision and Strategic Objectives should also directly address the challenge of mitigating and adapting to climate change.</p>
Mineral Products Association	<p>We agree that the Spatial Vision is appropriate. However, we have several comments about the wording of the Strategic Objectives.</p> <p>Those objectives for mineral working are not consistent with waste which seems to be given a more favourable alternative wording. For example, in Minerals 5 it is an objective to protect people and communities etc against mineral development, but the corresponding waste objective (8) is qualified as protection "from unacceptable effects of waste management development." We suggest the two objectives should be aligned further with similar terminology used for both minerals and waste. Another example, is Waste objective 10 where mitigation and compensation is sought for "any adverse effects of waste related development where appropriate" whereas the equivalent minerals related wording (Minerals objective 7) is "the effects of mineral development where possible". Again, the terminology used should be the same for both.</p> <p>Furthermore, Mineral objective 2 seeks to "attain the maximum possible usage of recycled and secondary materials." whereas the equivalent wording for waste is "encourage waste management facilities which increase reuse, recycling..." (4) and "promote use of waste as a resource including optimum use of recycled materials as aggregates.." (5). Promotion implies an active participation which is absent from 'encourage' which is more of an advocacy of recycling practice. We suggest that instead of seeking to attain maximum possible usage of recycled and secondary materials for aggregates, you should seek to encourage the optimum use of recycled materials.</p>
English Heritage	<p>We are concerned that paragraph 3.16 'Built Heritage' only provides basic facts with regard to designated heritage assets within the county. Leicestershire's historic environment is more than the sum of its designated assets. There is little to describe the overall character of the historic environment, including both designated and non-designated heritage assets and their condition across the plan area. Further work is required to address this, in order to provide a more detailed, factual portrait of the area.</p> <p>We consider that given the historic environment resource within the County, a dedicated strategic objective is required</p>

	for the conservation and enhancement of the historic environment, in order to accord with the NPPF. With regard to the spatial vision, as written the vision for waste cites the need to 'minimise' impact upon the environment, as per NPPF paragraphs 129 and 152 there is a need to 'avoid' or 'minimise,' and therefore this should be taken into consideration and reflected here.
Hanson UK	This point is agreed. In addition, the Spatial Vision and Strategic Objectives will require review to ensure that NPPF national policy objectives and principles are built in. This is especially important when considering the presumption in favour of sustainable development. The Strategic Objectives must be reconsidered in light of this, and other national policy changes.
Blaby Parish Council	Agree with amendment as per para. 3.27.
Council's Response (Qu.3) Spatial Vision is set out in draft document. Strategic Objectives have been amalgamated and amended in light of comments received. It is proposed to include Strategic Objectives, inter alia, to coordinate and work with all relevant organisations (in particular Leicester City Council and Leicestershire Local Authorities); to safeguard waste management facilities; to protect the natural, built and historic environment; to provide a net gain in biodiversity; to reduce the impact of developments on climate change; to ensure that restored areas are subsequently managed and maintained; and to support green infrastructure projects and strategies such as the National forest and Charnwood Forest Regional Park.	
Question 4: Future provision of aggregates	
Cambridgeshire County Council	The proposal to make provision for aggregates in excess of average 10 years sales is supported. Although economic recovery may be slow it is likely that future planned growth, including significant infrastructure projects, will give rise to greater demand for mineral over the plan period. It would therefore be prudent to include some flexibility above the minimum required by the NPPF, in order to be able to respond to such circumstances over the Plan period.
Lincolnshire County Council	This Council agrees that the level of future provision of (sand and gravel) should be higher than average sales over the last 10 years (1.15mt). The Issues Document states that, based on housing provision proposed in adopted and emerging Core Strategies within Leicester and Leicestershire, housing completions are forecast to be some 13% higher over the next 15 years compared with the last 10 years. It is also acknowledged that infrastructure projects within the East Midlands are likely to generate increased demand in the future as the economy improves. It is considered that a higher apportionment figure, to reflect future increases in demand in light of the above factors, would therefore enable Leicestershire to plan for its projected growth over the plan period from the outset, rather than waiting for markets to improve and then having to review the approach.
Northamptonshire County Council	Unless an increase can be supported by robust evidence base (justifying a specific % increase) then the NPPF 10 year average should be applied.

Rutland County Council	Agree that Leicestershire should make an appropriate provision for future crushed rock extraction in order to avoid any undue pressure being placed on Rutland's quarries to increase production.
Environment Agency	The ten year average looks quite appropriate, taking into account when times were good and the recession. What you suggest as a future sales target is dependent on how confident you are on the schemes highlighted and future residential development coming to fruition. However, given that approximately two thirds is exported outside of the county, producing more is probably useful for the surrounding schemes highlighted, providing that they do go ahead. Extensions are fine for the short term, but won't satisfy long term needs as highlighted in the suggested quantities. So, if you are to meet your projected demand, you will need a mix of extensions and new sites.
Mountsorrel Parish Council	The recession during 2008-2013 and government austerity has held down housing and infrastructure demand and reduced the 10 year average for aggregate production. Recent planning decisions for housing development have seen a dramatic increase in house building locally in the Charnwood area and demand for aggregates will bounce back to the high levels (16mt Crushed Rock and 1.3mt Sand & Gravel) of 2006 and 2007. Central Government infrastructure spending, for example on HS2, is also likely to increase. It seems prudent to increase the forecast to these high levels and this should not prove to be a problem for hard rock quarries like Mountsorrel.
Leicestershire Quarries Vision Project	The Government has recently introduced the concept of community payments by the industry in order to reduce local opposition to fracking. This idea should be adopted by the minerals operators. After all, what does Leicestershire get back from having so much mineral extraction going on? Unless there is some benefit, Leicestershire should progressively reduce its minerals provisions outside the area. They do amount to 67%. This question is particularly relevant because of the aspiration to reduce quarrying in National Parks. As this progressively happens, it is only natural to expect the operators to increase the extraction rate in Leicestershire to compensate. Many people will be horrified by the thought that Charnwood Forest will be quarried more so that the Peak District can be quarried less. What should be the attitude of the elected representatives of the Leicestershire population to this difficulty?
Freeby Estate	We believe that basing the future level of provision of aggregates on an average of the last 10 years' sales is in danger of restricting production to artificially low levels that could limit economic growth. Future supply should not be based on suppressed demand such as between 2008 to 2012. Housing completions are forecast to be 15% higher over the plan period when compared to the last 10 years. There are also a number of large infrastructure projects planned both in Leicestershire and the surrounding counties. We would propose adoption of either the average for the 2002 to 2007 period when the economy was more stable (1.4mt pa) or the figures as proposed by the SRA (EMRAWP) of 1.5mt pa.
LCC Highways	Instinctively, future provision for aggregates (across the country, not just Leicestershire) should be higher than average sales over the past ten years. The Government is seeking to accelerate the delivery of new housing to levels not seen in many decades (if ever in some places) and I understand there may already be a brick shortage in the UK? Future very significant infrastructure projects, e.g. HS2 and airport capacity expansion, will also be very material hungry. On a local level, investment in significant new transport infrastructure in Leicester and Leicestershire may be at greater levels in coming years than over the past decade.

Charnwood Borough Council	The effect of the recession on aggregate sales is clearly set out and therefore it is not unreasonable to plan for a larger amount. We would not wish to put forward specific amounts but clear, robust technical guidance should inform these calculations.
Derbyshire County Council	Derbyshire County Council supports the approach to aggregate provision agreed in February 2013 by the East Midlands Aggregate Working Party, whereby future provision is based on the average of the most recent ten year sales figures. The figures should be reviewed on an annual basis to ensure that the most recent information, including proposals for future development in the area, is taken into account. Where properly justified, Derbyshire County Council agrees that future aggregate provision could be higher than the average ten year sales figures.
Hinckley & Bosworth Borough Council	The consultation document acknowledges that in preparing a LAA it is appropriate to consider population forecasts, future house building; and major infrastructure projects. Reference is also given to the housing provision set out in existing and emerging Core Strategies and notes that housing completions are forecast to be some 13% higher than the last ten years. Whilst regard should be had to existing Core Strategies as a starting point, you may also be aware of the emerging Leicester and Leicestershire Strategic Housing Market Assessment (SHMA). The SHMA will consider the need for additional housing to 2036 and in turn will inform the housing provision to be made through future Local Plans in Leicester and Leicestershire. It is therefore recommended that regard is had to the outputs of the SHMA to inform the LAA. This will ensure the most up-to-date evidence is considered when forecasting the future demand for aggregates, enabling the County Council to make the necessary provision for mineral supply over the plan period.
LCC Green Infrastructure Team	At 4.25-4.29 should there be reference to East Midlands Gateway and related developments?
Lafarge Tarmac	The evidence is not reliable to justify a significant reduction in the annual requirement figure. The low outputs of sand and gravel production between 2008 - 2012 are a clear result of the recession and therefore skew the 10 year figure, whereas the sales of sand and gravel in the period 2003 – 2007 are consistent and are not distorted by spikes in demand. The most recent evidence available is that published in the Local Aggregates Assessment, May 2013. This provides an annual requirement figure for sand and gravel of 1.215mtpa, although with Slip Inn Quarry still being dormant a figure of 1.35mtpa is considered realistic and consistent with pre-recession outputs. It is considered that figure would be more realistic to adopt, given that the early part of the plan period is likely to see some broad economic growth. For crushed rock the figures have been more consistent over the last 10 years, as crushed rock production is more stable and support the figure of 14.06mtpa. The peaks in production in 2006/07 are more reflective of increased demand during strong economic conditions and the rail links providing crushed rock to London and the East of England.
Staffordshire County Council	We accept that the 10 years sales average can provide a useful indicator to the level of future provision but there is a requirement to consider other relevant local information. Paragraph 4.26 of the consultation document indicates that there is expected to be a steady rise in population and a 13% rise in net housing completions when compared with the previous ten years. Paragraphs 4.27 and 4.28 also list some of the infrastructure projects that will require aggregates.

	Referring to table 4.1, it is evident that annual sales since 2005 have not reached the levels of the sub regional apportionments based on the latest sub national guidelines. At this stage, a 10 years sales average provides a basis for provision but the proposed provision should also consider whether that provision is sufficient for growth in those areas which are significant importers of aggregate supplied from quarries in Leicestershire given the rates of export quoted under paragraph 4.28. Assessments of need for aggregate minerals should monitor the requirements of major infrastructure such as the HS2 project and the growth aspirations for areas such as Birmingham (e.g. refer to Greater Birmingham and Solihull Local Enterprise Partnership draft spatial plan).
UK Coal Producers	Yes.
Carlton Parish Council	It depends what is meant by 'well in excess' (para. 4.18). There is merit in using high estimates so as to provide a supply buffer if demand should increase. The Olympic stadium was built on aggregate from Leicestershire, and the same will probably be true for HS2 if it goes ahead, so 2013/14 may be low production years. There seems little point in expending great effort in the production of accurate forecasts. After all, aggregate will not be extracted if there are no buyers.
Mineral Products Association	<p>We agree that the future provision of aggregates should be higher than the last 10 years' average. You suggest in para 4.25 that population forecasts; future house building; and major infrastructure projects should be considered in calculating future supply. In view of the high proportion of material which is exported we also suggest that you take into account likely demand and supply in the receiving areas. For example, London and South East is the powerhouse of a return to economic prosperity and information available nationally confirms that growth is concentrated in this area. Since two thirds of Leicestershire's output of crushed rock is exported to other regions it makes sense to take account of what the demand is likely to be from those areas. Similarly, 63% of sand and gravel was exported to neighbouring counties. With this high level of exports an assessment of 'other relevant local information' cannot be limited to projects located within Leicestershire alone. It should and must look at the call on reserves from importing areas.</p> <p>No MPA is to our knowledge carrying out anything more rudimentary than listing projects in their local area or a carrying out a simple projection of population growth or housing completions. Whilst these elements will be part of the demand mix, on their own they are completely inadequate to project aggregates demand. The County council needs to develop robust methods of local demand forecasting in order to meet the requirements of NPPF. Because of the high levels of exports from the county to mainly urban areas devoid of their own aggregates resources, and where it is most likely that economic growth will take place, future output is likely return to pre-recession levels.</p>
English Heritage	Whilst we have no detailed comments to make on this, any levels of provision for aggregates should be carefully balanced against the environmental capacity of the area, in order to achieve sustainable development, in accordance with NPPF paragraphs 14 and 152.
Council's Response (Qu.4) The provision of sand & gravel, and crushed rock is based on average sales over the last 10 years. However, the situation will be carefully monitored and if higher production rate continue for an extended period, then the overall requirement will need to be re-	

evaluated.	
Question 5: Extensions to existing sand and gravel sites	
Northamptonshire County Council	A balance between extension of existing sites / new sites within broad areas currently and historically subject to minerals extraction and new sites should be taken forward supporting maximum recovery of resources and id of new sites where environmentally acceptable.
Mountsorrel Parish Council	The Parish Council considers extensions to existing sites to be the best policy rather than identifying new sites as far as possible.
Leicestershire Quarries Vision Project	No. Because sand and gravel workings are temporary and can be restored relatively easily to high quality recreational and wildlife space, there is a case for siting them near significant centres of population. Watermead Park and Charnwood Water are classic examples.
Thurlaston Parish Council	No. Any extension to the exhausted operation at Huncote Quarry would entail the movement of operations from the eastern side of the M69 to the western side. Previous proposals have indicated that use of the existing farm crossing bridge, over the M69, would be made to extract the sand/gravel. Should this proposal prove to be unworkable the alternative access to the site would involve traffic routing through one of the villages of Thurlaston, Croft or Huncote. We see this as being totally unacceptable due to the adverse impact this would have upon the village of Thurlaston in terms noise, air pollution, cleanliness, road safety, etc.
Freeby Estate	Whilst we agree with the principle of extension being preferred to the opening of new sites, we do feel that the east of the county, together with Rutland, is very poorly served existing sites. We would therefore look to give this only qualified support to enable an even spread of sand and gravel provision across the county in the hope of minimising the environmental impact of long distance lorry movements.
LCC Highways	Is a strategy based on prioritising existing sites credible given potential future UK demands?
Hinckley & Bosworth Borough Council	When considering future provision of mineral extraction, existing Policy of the Minerals Core Strategy (Policy MCS2) favours extensions to existing mineral workings which offers benefits such as minimising environmental disturbance elsewhere and utilising existing infrastructure (such as existing access and processing facilities). The approach of continued extraction in a relatively small location can however result in the ongoing and cumulative impacts on amenity and the environment. The impacts of extending existing workings need to be considered against the impacts of new provision elsewhere. The Borough Council recommends adopting a strategy of favouring extensions to existing workings where this is considered environmentally acceptable compared to the creation of new sites. The Borough Council would request that LCC undertake an appraisal of extensions to existing sites, in addition to potential new sites, to inform allocations for future mineral working.
LCC Green Infrastructure Team	The strategy of giving priority to extensions to existing sand and gravel extraction sites, rather than identifying wholly new sites in other areas, should be continued subject to such extensions having no adverse environmental impacts, either independently or cumulatively.

Lafarge Tarmac	We agree to the strategy to give priority to extensions to existing sites.
UK Coal Producers	No. This approach could expose the Authority of stifling competition and favouring existing companies.
Leicestershire & Rutland Wildlife Trust	Yes.
Carlton Parish Council	The current strategy is considered most appropriate, providing that anticipated needs can be met from existing sites.
Cemex	Agree.
RSPB	The RSPB supports - in principle - giving priority to extensions of existing sites, assuming that this approach would result in reduced environmental disturbance compared to wholly new sites. However, where such extensions would have an adverse effect on nature conservation designations and other priority habitat, new sites with a less significant adverse effect should be considered. Consideration should also be given to new sites where these would provide a more significant contribution to the creation of a coherent and resilient ecological network (e.g. where a landscape-scale area of priority habitat would be created, thereby significantly enhancing the existing ecological network).
Mineral Products Association	Whilst there can be benefits in preferring extensions on the grounds of lower environmental impact, the County Council should be careful not to use such a policy as a barrier to entry to the local market. This means that if a new site is as good as an extension elsewhere it should not be refused because it is a new site.
Blaby Parish Council	We strongly support the strategy of giving priority to extensions to existing sites, in all cases.
Council's Response (Qu.5): The plan gives priority for extensions to existing sites.	
Question 6: New sand and gravel sites	
Northamptonshire County Council	A balance between extension of existing sites / new sites within broad areas currently and historically subject to minerals extraction and new sites should be taken forward supporting maximum recovery of resources and identity of new sites where environmentally acceptable.
Environment Agency	Both extensions and new sites need to be considered.
Mountsorrel Parish Council	The Parish Council agrees the Plan should only look to new sites, when existing sites and planned extensions are insufficient to meet demand.
Leicestershire Quarries Vision Project	No. The principle of sustainability requires that a site meets some future "need". Development should therefore occur where the benefit of the future need is greatest.

Thurlaston Parish Council	No. A holistic approach should be adopted to the extraction of minerals within the county of Leicestershire. Extensions to existing sites may not be the most appropriate way of meeting the future requirement. Extensions may cut across the overall Sustainability Objectives and new sites should also be considered to ensure the most appropriate solutions are taken.
Freeby Estate	Whilst we agree that in principle the Plan should only look to allocate new sites when existing sites cannot meet the landbank requirements, we feel that this assessment should be judged on existing permitted reserves only, rather than including potential extensions which cannot be certain of delivery. We further believe that the spread of reserves across the county should be taken into account and the lack of reserves in east Leicestershire/Rutland may necessitate a deviation from this principle, as the opening of a new site would serve a large geographic area that currently relies on material from the county being transported relatively long distances by road.
LCC Highways	I do necessarily agree with this statement. Surely we should be proactive in identifying potential sites now, so that we are best placed to respond rapidly to future mineral demands rather than waiting until existing site are no longer tenable. (Many would argue that at a national level Governments have done this in planning for future power supply, i.e. it is only as existing power stations are at the ends of their lives we are now beginning to think about providing replacement capacity.)
LCC Green Infrastructure Team	Agree that the Plan should only look towards allocating new sand and gravel sites when existing sites or their extensions are unable to meet future requirements.
Lafarge Tarmac	The Plan should allocate sufficient reserves for the Plan period to maintain a landbank of permitted reserves to deliver the annual requirement. The Plan should look towards 'permitting' new mineral sites when there is an identified need to maintain a landbank of permitted reserves and or maintain sufficient production capacity to deliver the annual requirement.
UK Coal Producers	No. New sites should be considered on their merits, as should site extensions in the normal planning application process.
Leicestershire & Rutland Wildlife Trust	Yes.
Cemex	No. Giving priority to extensions should not exclude new sites as this could be seen as anti-competitive. It also makes the presumption that any extension would have less environmental impacts than a new site prior to any assessment or consideration.
RSPB	The ability to meet future requirements should not be the only criteria for prioritising new mineral sites over extensions to existing minerals sites. The cumulative environmental impact should be a consideration when choosing between extensions to existing mineral sites and the allocation of new mineral sites. Consideration should also be given to new sites where these would provide a more significant contribution to the creation of a coherent and resilient ecological

	network.
Mineral Products Association	We agree that the Plan should look towards allocating new mineral sites where necessary, but that they should not necessarily be discounted just because they are new.
Blaby Parish Council	Agree
Council's Response (Qu.6) Only one new sand and gravel site has been put forward for allocation and this is deemed environmentally unsuitable. New sites would be permitted where existing sites could not provide sufficient sand and gravel or if they result in significant benefits over allocated areas.	
Question 7: Location of future sand and gravel sites	
Lutterworth Town Council	Whilst Lutterworth Town Council does not object in principle to the extension of the proposed site at Shawell, it is considered necessary for traffic management regulations to be implemented. Experience shows that current vehicle movements to the site are having a negative impact on the town of Lutterworth. Any future planning applications for the site at Shawell should therefore aim to eliminate traffic or to reduce it. The A5 should be utilised as a priority route to divert the traffic away from Lutterworth. Lutterworth Town Council is keen to see a lorry ban introduced for the centre of Lutterworth.
Lutterworth Town Council	Lutterworth Town Council does not object in principle to the site at Husbands Bosworth & Cotesbach being extended, provided that the volume of traffic does not increase. There would be great concern if the site was to be used more intensively than it is at present. Routeing agreements must be determined to ensure that vehicle movements do not adversely affect Lutterworth. The A14, M6 and M1 routes should be prioritised when determining these agreements. Lutterworth Town Council is keen to see a lorry ban introduced through the centre of Lutterworth.
Northamptonshire County Council	A balance between extension of existing sites / new sites within broad areas currently and historically subject to minerals extraction and new sites should be taken forward supporting maximum recovery of resources and identity of new sites where environmentally acceptable.
Environment Agency	No one site will last forever, but any site should be completely exhausted of minerals before moving to the next site. If new sites are located close to old sites, this would seem to be more appropriate as Communities will be more accepting in the locations of existing sites as opposed to communities in current non-quarrying areas.
Mountsorrel Parish Council	Further work should be carried out by the mineral companies to identify the resources adjacent to existing sites and upgrade them from 'inferred' to 'indicated' status and to proven reserves. The Parish Council will strongly oppose new sites in the Soar Valley area in or adjacent to the parish because of the cumulative impact (MDC13) of such operations and the existing Buddon Wood quarry and associated facilities.
Leicestershire Quarries Vision Project	Because sand and gravel workings are temporary and can be restored relatively easily to high quality recreational and wildlife space, there is a case for siting them near significant centres of population.

Thurlaston Parish Council	Taking the 'least line of resistance' option of simply expanding existing operations is simply a tactical manoeuvre. If we are sincere in our objective of a Strategic Minerals Plan up to 2031 then we must look at all options. This will undoubtedly require further work to add to the findings of the British Geological Survey to ascertain sites of future potential extraction which fall within the Sustainability Objectives. This work should be commissioned sooner rather than later, notwithstanding the current economic climate.
Freeby Estate	We believe that given the absence of any sites in Rutland or in the north east of the county, there is a strong argument for a new site to be opened to serve this area and avoid excessive haulage distances for material from the other side of the county where the majority of the existing sites and reserves are located. It is believed that there is a significant alluvial sand and gravel deposit within the Eye valley to the east of Melton Mowbray. The Freeby Estate have significant landholdings in the vicinity of Wyfordby and Freeby villages including land alongside the River Eye. There is an identified lack of aggregate provision for sand and gravel through the forthcoming Plan period. It seems very unlikely that this can be met from extensions at existing operating quarries. This is likely to necessitate the opening of a new site within the county and it is sensible that sites are evenly spread where the geology allows.
Lafarge Tarmac	There is potential to extend existing sand and gravel sites. Lafarge Tarmac are able to identify the following extensions for allocation as Specific Sites; as well as extensions for allocation as additional Preferred Areas; and wider Areas of Search: Shawell Quarry - Specific Sites for extension and Areas of Search Lockington Quarry - Specific Sites for extension, Preferred Areas and Areas of Search Cadeby Quarry - Preferred Area and Area of Search Husbands Bosworth Quarry - Preferred Area and Area of Search Brooksby Quarry - Specific Sites for extension and Area of Search.
RSPB	One of the criteria to be considered when deciding on the location of new sand and gravel sites should be the potential of the site to deliver a net-gain in biodiversity through the landscape-scale creation of priority habitat, such that it makes a significant contribution to the creation of a coherent and resilient ecological network. With this in mind, priority should be given to locating new sand and gravel sites with landscape-scale conservation initiatives such as the Leicestershire & Rutland Wildlife Trust's 'Living Landscapes' and the RSPB's Trent & Tame Futurescape, provided that these mineral sites do not have an adverse effect on existing designated sites and priority habitat.
Mineral Products Association	The question of future locations of sites will be a matter for our members to comment on.
English Heritage	(Qus.5-8) Whilst we have no detailed comments to make, any future provision in terms of extension to existing sites, identification of sites or areas of search, should be balanced against environment considerations, including the historic environment.
Council's Response (Qu.7) Extensions have been put forward for all existing sand and gravel sites and extensions to four out of the five existing sites have been deemed suitable for allocation. The exception is proposed extensions to Lockington Quarry. The proposed new site in the vicinity of	

Wyfordby and Freeby is also not considered to be suitable. The plan addresses how provision is to be met beyond those sites allocated.

Question 8: Identification of future sand and gravel working

Northamptonshire County Council	If industry / landowners can identify viable sites that are determined through assessment to be suitable as being allocations these should be taken forward. Where insufficient sites are identified to provide the total aggregate during the plan period, 'areas of search' should also be identified.
Environment Agency	To achieve what has been proposed in tables 4.2 & 4.3, then there is the need to identify specific sites.
Mountsorrel Parish Council	This is not a clear dichotomy and both options should be considered. Identifying areas of search may provide a choice of future sites which could be evaluated on the basis of their environmental and social impact. Specific sites are more clear cut and provide certainty for producers but may not be sites with the lowest environmental and social impacts.
Leicestershire Quarries Vision Project	Areas of search would be better. Sustainability requires that development should occur where the benefit of a "future need" is greatest. These are likely to be near centres of population.
Thurlaston Parish Council	The Strategic Plan should focus upon identifying 'areas of search' as well as maximising extraction from 'specific sites of search', providing that extraction from these 'areas of search' and 'specific sites of search' does not contravene the Sustainability Objectives.
Freeby Estate	<p>We believe that identifying areas of search would be a better approach as little site specific work has been carried out and the location of some mineral deposits are based on inference from BGS information. Identifying specific sites at this stage may prove to give inadequate future provision of sand and gravel due to the uncertainties of this information and identifying areas of search would encourage a more detailed examination of those areas in order to prove reserves or otherwise.</p> <p>BGS information indicates significant potential reserves of sand and gravel in the Eye Valley east of Melton Mowbray and notably in the vicinity of Wyfordby, but up until now these have not been properly investigated. The creation of an Area of Search in this locality would encourage such proper investigation so that a better understanding of the reserves would be formed, thus assisting the county in developing their minerals policy and meeting their target provisions. An area of search along the Eye Valley would also help in creating a more even spread of sites around the County and reducing the impact of haulage.</p>
Hinckley & Bosworth Borough Council	Specific sites provide greater certainty as to where mineral extraction is likely to take place minimising the risk of ad-hoc proposals coming forward over the plan period. The Borough Council would favour an approach which seeks to make the necessary provision through allocating specific sites, with the possibility of a phasing trajectory of when the sites are likely come forward over the plan period. This would provide certainty to land owners and residents as to where minerals extraction is likely to take place and make the necessary policy provisions and amenity and environmental safeguards such as appropriate buffer distances between sensitive uses. It also provides the opportunity to identify appropriate restoration and after use schemes from the outset to inform future planning applications.

LCC Green Infrastructure Team	Identifying areas of search for future sand and gravel extraction would be a better option than identifying specific sites as it would allow more flexibility over the Plan period.
Lafarge Tarmac	We would support use of all three options, as it provides an approach to allocate specific extensions to give a higher degree of certainty on delivery but also provide clarity for the preferred approach for where additional sand and gravel reserves might be permitted to meet future identified needs during the plan period.
Leicestershire & Rutland Wildlife Trust	Areas.
Cemex	Area of search would be preferable.
RSPB	The RSPB supports the approach currently being developed by Worcestershire County Council of identifying 'areas of search' where there is a viable mineral resource AND where (restored) mineral sites would make a significant contribution to the delivery of one of more ecosystem services. Landscape-scale conservation initiatives, such as the Wildlife Trust's 'Living Landscapes' and the RSPB's Trent & Tame Futurescape, should be taken into consideration when identifying these 'areas of search'.
Mineral Products Association	Site specific allocations should always be made before consideration of Areas of Search.
Blaby Parish Council	We favour identifying areas of search in all instances.
Council's Response (Qu.8) The approach of identifying specific sites has been adopted. Following further discussions with Lafarge Tarmac, the company have withdrawn all their proposals for Areas of Search. Development of land in the Eye Valley east of Melton Mowbray is not considered to be suitable.	
Question 9: Extensions to existing rail-linked quarries	
Cambridgeshire County Council	Cambridgeshire, in common with other counties, does not have hard rock reserves and therefore relies on importing this material from other areas; it imports a significant amount of hard rock from the Mountsorrel Quarry in Leicestershire. It is noted that the East Midland Aggregates Working Party has raised concerns about the medium to long term supply of crushed rock from Leicestershire, particularly at quarries which have rail links. The proposal to give priority to extensions at these sites is supported. These sites have a strategic role beyond their immediate area, and continuity of hard rock supply needs to be considered in this wider context. In the event that extension to existing quarries are not sustainable provision should be made elsewhere, but sites should ideally have a rail connection.
Mountsorrel Parish Council	Yes, priority should be given to the extension of rail linked quarries. Road transport is much worse for the local environment and produces more CO2 emissions.

Leicestershire Quarries Vision Project	Yes. It makes economic and environmental sense. It also gives the operator the opportunity to restore the previous workings whilst heavy equipment is on site and there is a need to move overburden. It also gives the regulatory body the opportunity to suspend permissions if the operator does not comply with its restoration responsibilities. Extensions may require the movement of more overburden and this raises the issue of what to do with it. Creating new hills off-site, outside the red line should be discouraged. There could be a legal technical point here. The industry managed to avoid overburden being classed as "waste" and therefore it carries no Landfill Tax. This concession could be re-examined unless the industry can find a more constructive use for the overburden. Replacing it in the void as part of a restoration plan, or use as capping for landfill are possibilities, but should a well-established wooded bund be removed, or just left in situ? Probably best left alone.
LCC Highways	In principle, I would agree that movement of quarried materials by train should be prioritised where it makes sense in terms of journey distance and/or cost. However, as per the response to Q5, is a strategy based on prioritising existing sites credible given potential future UK demands?
Derbyshire County Council	Derbyshire County Council understands that most of the igneous rock in the Charnwood area is of a different type from that in Derbyshire, and therefore is not in competition with Derbyshire's resource and the economic activity generated locally. Much of the rock generated is used as track ballast for rail operations nationally, and is crucial for rail upgrade works affecting Derbyshire.
Derbyshire County Council	Derbyshire County Council supports this policy because it reduces the potential harmful effects on roads and communities, especially in South Derbyshire.
LCC Green Infrastructure Team	Agree that priority should be given to extensions to existing rail-linked quarries.
Lafarge Tarmac	We agree to the strategy to give priority to extensions to existing rail linked quarries.
UK Coal Producers	No. This approach could expose the Authority of stifling competition and favouring existing companies.
Leicestershire & Rutland Wildlife Trust	Yes, provided that no unacceptable damage to important sites such as SSSIs and Local Wildlife Sites results.
Cemex	Yes - Need support from Network rail to provide aggregate freight capacity.
Mineral Products Association	Large rail linked quarries are examples of a very high degree of financial and infrastructural investment. It would not be efficient or cost effective to abandon such investment before the resource has been shown to be exhausted. However, once again a preference for extensions should not be used as a barrier to entry to the market if new sites can be established in an environmentally acceptable manner.
Hanson UK	It is considered that this question is asked in respect of the preceding section of the issues document, dealing with crushed rock aggregates. In respect of industrial minerals such as brick making minerals, it would be inappropriate to

	follow the principle of prioritising rail linked quarry extensions over non railed linked. This is linked to NPPF paragraph 146, which promotes the fundamental principle of ensuring sufficient industrial mineral supply to existing manufacturing facilities. Although it is recognised that regional apportionment is less of an issue for industrial minerals as aggregate minerals, it is considered that this ambiguity be clarified.
Blaby Parish Council	Priority should be given to existing rail-linked quarries.
Council's Response (Qu.9): Policy gives priority to extensions to existing rail-linked rock quarries. A similar prioritisation does not apply to brick clay sites.	
Question 10: Extensions to existing rock quarries	
Mountsorrel Parish Council	Buddon Wood Quarry in Mountsorrel has been granted permission for extension to the south and production capacity until 2033. Further expansion is limited by Swithland reservoir and Buddon Wood. The planned housing development on Halstead Road will limit further expansion to the SE. This sterilisation of potential resources is unfortunate and will limit future production unless underground working is proposed. A research study should be carried out on the feasibility of underground working and its impact on the local community.
Leicestershire Quarries Vision Project	The answer to this question is known by the operators who, for economic necessity, take a very long term view of the industry.
Lafarge Tarmac	The potential to extend existing hard rock quarries needs to be done on a site by site basis as the physical circumstances for each quarry is very specific. Significant increase in production capacity is difficult as it is due to physical constraints on operational footprint and often the need for major reconfiguration of processing plant. This has been evidenced at both Mountsorrel Quarry and Bardon Hill Quarry through recent planning applications.
Mineral Products Association	The question of potential to extend existing quarries will be a matter for our members to comment on.
Council's Response (Qu.10): Plan gives priority to existing rail-linked hard rock sites, but does not specify extensions to particular quarries.	
Question 11: Strategy for future crushed rock extraction	
Northamptonshire County Council	If sufficient permitted reserves exist these should be prioritised unless clear justification can be given as to why a new site would be necessary to continue supply of aggregates.
Mountsorrel Parish Council	The strategy of extensions to existing sites should be continued as it limits the impact on areas such as Charnwood Forest and the proposed Regional Park. Opening large new hard rock quarries would not be acceptable to much of the population.

Leicestershire Quarries Vision Project	One needs to do both if the principle of sustainability is to be followed. Satisfying our present needs should be done to best meet the needs (not necessarily the same needs) of future generations. There will be surprisingly few new sites that meet this requirement and it is best to identify and know about them now. It might be arguable that the easiest way of restoring quarries is simply to remove hills and flatten the landscape. It is the very large voids that cause the most restoration problems.
LCC Highways	I do necessarily agree with this statement. Surely we should be proactive in identifying potential sites now, so that we are best placed to respond rapidly to future mineral demands rather than waiting until existing site are no longer tenable. (Many would argue that at a national level Governments have done this in planning for future power supply, i.e. it is only as existing power stations are at the ends of their lives we are now beginning to think about providing replacement capacity).
Hinckley & Bosworth Borough Council	When considering future provision of mineral extraction, existing Policy of the Minerals Core Strategy (Policy MCS2) favours extensions to existing mineral workings which offers benefits such as minimising environmental disturbance elsewhere and utilising existing infrastructure (such as existing access and processing facilities). The approach of continued extraction in a relatively small location can however result in the ongoing and cumulative impacts on amenity and the environment. The impacts of extending existing workings need to be considered against the impacts of new provision elsewhere. The Borough Council recommends adopting a strategy of favouring extensions to existing workings where this is considered environmentally acceptable compared to the creation of new sites. The Borough Council would request that LCC undertake an appraisal of extensions to existing sites, in addition to potential new sites, to inform allocations for future mineral working.
LCC Green Infrastructure Team	Agree with continuation of the strategy of releasing reserves of crushed rock to be worked as extensions rather than identifying wholly new sites elsewhere.
Lafarge Tarmac	We agree to the strategy to give priority to extensions to existing sites.
UK Coal Producers	No. This approach could expose the Authority of stifling competition and favouring existing companies.
Leicestershire & Rutland Wildlife Trust	Yes, provided that no unacceptable damage to important sites such as SSSIs and Local Wildlife Sites results.
Cemex	No. Giving priority to extensions should not exclude new sites as this could be seen as anti-competitive. It also makes the presumption that any extension would have less environmental impacts than a new site prior to any assessment or consideration.
RSPB	The ability to meet future requirements should not be the only criteria for prioritising new mineral sites over extensions to existing minerals sites. The cumulative environmental impact should be a consideration when choosing between extensions to existing mineral sites and the allocation of new mineral sites. Consideration should also be given to new

	<p>sites where these would provide a more significant contribution to the creation of a coherent and resilient ecological network.</p> <p>One of the criteria to be considered when deciding on the location of new sites should be the potential of the site to deliver a net-gain in biodiversity through the landscape-scale creation of priority habitat, such that it makes a significant contribution to the creation of a coherent and resilient ecological network.</p>
Mineral Products Association	<p>Large rail linked quarries are examples of a very high degree of financial and infrastructural investment. It would not be efficient or cost effective to abandon such investment before the resource has been shown to be exhausted. However, once again a preference for extensions should not be used as a barrier to entry to the market if new sites can be established in an environmentally acceptable manner.</p>
Council's Response (Qu.11): Policy gives priority to existing rail-linked hard rock sites but does not prohibit the development of new sites.	
Question 12: Identification of future rock operations	
Northamptonshire County Council	<p>If industry / landowners can identify viable sites that are determined through assessment to be suitable as being allocations these should be taken forward, where insufficient sites are identified to provide the total aggregate during the plan period 'areas of search' should also be identified.</p>
Mountsorrel Parish Council	<p>There is not enough information supplied to answer this question. If new sites have to be found then a regional study should be carried out to ascertain the most suitable geology with the lowest environmental and social impacts (BGS's comment 4.54). As the Leicestershire crushed rock quarries are of national importance then this study should be funded by National Government not by local authorities.</p>
Leicestershire Quarries Vision Project	<p>Areas of search should be the starting point. Specific sites would follow. The industry is probably best placed to do this, and indeed, may already have.</p>
Hinckley & Bosworth Borough Council	<p>Specific sites provide greater certainty as to where mineral extraction is likely to take place minimising the risk of ad-hoc proposals coming forward over the plan period. The Borough Council would favour an approach which seeks to make the necessary provision through allocating specific sites, with the possibility of a phasing trajectory of when the sites are likely come forward over the plan period. This would provide certainty to land owners and residents as to where minerals extraction is likely to take place and make the necessary policy provisions and amenity and environmental safeguards such as appropriate buffer distances between sensitive uses. It also provides the opportunity to identify appropriate restoration and after use schemes from the outset to inform future planning applications.</p>
LCC Green Infrastructure Team	<p>Identifying areas of search for future rock extraction would be a better option than identifying specific sites as it would allow more flexibility over the Plan period.</p>
Lafarge Tarmac	<p>We agree to the strategy to give priority to extensions to existing sites.</p>
UK Coal	<p>Areas of search would be our preference.</p>

Producers	
Leicestershire & Rutland Wildlife Trust	Areas.
Cemex	Area of search would be preferable.
RSPB	The RSPB supports the approach currently being developed by Worcestershire County Council of identifying 'areas of search' where there is a viable mineral resource AND where (restored) mineral sites would make a significant contribution to the delivery of one of more ecosystem services. Landscape-scale conservation initiatives, such as the Wildlife Trust's 'Living Landscapes' and the RSPB's Trent & Tame Futurescape, should be taken into consideration when identifying these 'areas of search'. Charnwood Forest is particularly relevant for igneous rock.
Mineral Products Association	Site specific allocations should always be made before consideration of Areas of Search.
English Heritage	(Qus.9-12) Whilst we have no detailed comments to make, any future provision in terms of extension to existing sites, identification of sites or areas of search, should be balanced against environment considerations, including the historic environment.
Council's Response (Qu.12) It is not considered appropriate to identify specific areas for future rock extraction given the limited information available on potential rock resources. The plan does however allow additional permissions to be granted in particular circumstances in order to maintain supply.	
Question 13: Brickclay	
Northamptonshire County Council	Current policies are adequate.
Leicestershire Quarries Vision Project	The existing strategy probably needs modifying in order to introduce the concept of sustainability. Again, areas that satisfy some "need" of future generations should be identified.
LCC Highways	Response similar to that for Q4 in terms of likely levels of future demand should inform a review. Not qualified to give a view on where any news sites/areas should be identified.
Derbyshire County Council	For information purposes only, please find below details of a permitted clay site in Derbyshire that is used to supply Desford brickworks. There is a brick clay extraction site and mothballed brickworks at Waingroves, near Ripley, operated by Hanson Brick Ltd. Planning consent exists up to the year 2042. The brickworks at Waingroves ceased production in 2006. Brick clay extraction is undertaken in a 'campaign' where there is a concentrated short period of extraction, usually on an annual

	basis; the material is stockpiled on site and blended. Clay is then removed offsite to the customer principally to the company's Nottinghamshire (Kilton) and Leicestershire (Desford) brickworks. Permitted reserves are estimated to be around 2.5 million tonnes, whilst annual extraction rates are approximately 30-40,000 tonnes which more than adequately provides for a 25 year landbank.
LCC Green Infrastructure Team	Existing policy MCS3 related to brickclay does not need amending.
Measham Parish Council	Measham has sufficient permitted reserves for the life of the plan so would not expect further sites to be opened in this area.
Hanson UK	It is important that the adopted core strategy policy dealing with other construction materials and energy minerals is reviewed for a longer plan period. Over and above this requirement, MCS3 should be reviewed to consider the more recent need to secure the extant permissions for outlying or satellite strategic mineral resources due to heavy rationalisation of operational production facilities. With the updated presumption in favour of sustainable development, it is inevitable that MCS3 should be updated to take account of this guiding national policy. It is however recognised that MCS3's provision of a presumption for extensions at existing industrial facilities, is partly consistent with NPPF. Identification of specific sites is not considered necessary in respect of this policy, although linkage through to mineral safeguarding and consultation zones would need to ensure suitable protection of mineral resources in the vicinity of existing manufacturing facilities. Should identification be a forthcoming need of the policy review, a full consultation and call for sites would be expected, again, especially if the plan period is extended to 2031.
Council's Response (Qu.13) Policy has been amended to require a minimum of 25 years of permitted reserves at existing sites. Local supply is generally desirable in order to reduce the environmental impacts of transportation of clay from the pit to the works. It is therefore considered that additional brickclay resources should normally be released as close as practicable to the brickworks that it is to be supplied.	
Question 14: Fireclay	
Northamptonshire County Council	Current policies are adequate.
UK Coal	Policy MCS4 is acceptable in its current format.
Leicestershire Quarries Vision Project	Incorporate "sustainability". Fireclay is such specialist material that special provision should be made for it.
LCC Highways	Response similar to that for Q4 in terms of likely levels of future demand should inform a review. Not qualified to give a view on where any new sites/areas should be identified.
Derbyshire	Support is given to existing Core Strategy Policy (MCS4) which makes provision for the establishment of a long term

County Council	stocking and blending facility at Donington Island, which recognises the importance of the middle coal measures of North West Leicestershire as an important fireclay resource.
National Forest Charitable Trust	<p>It is understood that after 2017 the clay stocking facility will be reduced in size but remain sufficient for the long term provision of fireclay and would be the subject of a future planning application.</p> <p>Whilst Wavin, the current owners of the claystocking facility, are discussing with the Trust the phased restoration and transfer of those parts of the site not required for the long term stocking of fireclay, the ability of the Trust to use such land effectively is dependent on highway access and there would appear to be a conflict between the use of existing accesses for claystock purposes and for leisure and recreation uses. The Trust would request that the County Council take all steps to resolve this issue so that a viable forest park can be developed.</p> <p>The section 106 agreement states that Hepworth (and its successors in title) shall transfer the balance of the Donington Island site to the Trust for a peppercorn on completion of the restoration work following the removal of the clay stocks. Policy MCS4 as currently written ignores the impact of the proposed long term stocking facility on the section 106 agreement and the transfer of the remainder of the site to the Trust. It is suggested that the words "and subject to the provision of a suitable highway access for the balance of the site which is to be developed as part of Heart of the Forest Park." be added to the second paragraph.</p> <p>The precise location of the long term clay stocking and blending facility would need to be considered in the light of the above issue.</p>
LCC Green Infrastructure Team	Existing policy MCS4 related to fireclay does not need amending. Agree that a specific area should be identified for a long term clay stocking and blending facility at Donington Island, but no thoughts as to the area to be identified.
National Forest Company	<p>The existing facility at Donington Island is within the Heart of The National Forest and surrounded by publicly accessible woodlands and other habitats. The early restoration of this site to form part of the Heart of the Forest is therefore strongly supported by the NFC.</p> <p>While part of the existing site may be the most suitable location for a long-term stocking and blending facility, the NFC considers that this does not need to be identified within the Local Plan. The planning permission for the current operation expires in three years' time which provides an opportunity for the most suitable location for the use to be considered without the constraint of a policy identifying where the use should be located. This may allow the facility to relocate to a more suitable site, providing the early release of the current site to Forest related uses.</p>
Staffordshire County Council	The stockpiling facility at Donington Island is an important source of fireclays for clay product works in the Midlands and proposals to safeguard this stockpiling site are supported subject to addressing any concerns regarding environmental impact. The policy makes provision for the extraction and stockpiling of fireclay but paragraph 4.67 of the consultation document indicates that the only viable source of fireclay is likely to be in association with surface coal mining operations. The new Plan should consider whether there should be additional provision for stockpiling fireclays in association with prospective opencast coal mining proposals.
UK Coal Producers	Part A. No, fire clay should be considered jointly with a coal site application from a need and economic benefit perspective.

Hanson UK	<p>Long term provision of fireclay stockpiles is a very relevant linkage between the brickmaking industry and the coal sector. Fireclay remains a finite and strategic resource in order to satisfy the demand of the UK construction industry. MCS4 remains on the whole current in terms of the industry requirement, however modernisation could occur in order to maintain the principles of NPPF in respect of paragraph 147.</p> <p>Proposals in respect of Donington Island should be considered in light of the presumption in favour of sustainable development, but also taking into account the local and national need of this material. As we consider the link to coal permissions, proposals to export, import and stockpile fireclays into existing and future brick manufacturing sites should be considered within the existing principles of MCS4, and where they will not cause unacceptable environmental impacts.</p> <p>In general, Hanson Building Products support the general principle of safeguarding Fireclays and would want the policy to be maintained, and strengthened in light of transference of this resource from point of origin, to point of suitable use.</p>
Council's Response (Qu.14) Policy broadly unchanged. Establishment of a stocking and blending facility within the Donington Island Site is proposed, subject to mitigation measures.	
Question 15: Gypsum	
Northamptonshire County Council	Current policies are adequate
Mountsorrel Parish Council	Existing Core Strategy Policy does not need amending. British Gypsum should identify sites for underground mining.
Leicestershire Quarries Vision Project	Incorporate "sustainability". From the sustainability viewpoint, underground workings should have less impact than surface operations.
LCC Highways	Response similar to that for Q4 in terms of likely levels of future demand should inform a review. Not qualified to give a view on where any new sites/areas should be identified.
Charnwood Borough Council	<p>Policy on future locations should have regard to sustainable transport movements because Barrow benefits from rail access unlike any future development near Wymeswold.</p> <p>The Adopted Minerals Core Strategy Policy MCS5 states that the strategy for gypsum is to allow proposals for new extraction sites and extensions to existing extraction areas only where they are required to meet a proven need, provided that such proposals will not cause unacceptable harm to the environment or communities. The policy rightly emphasises the need to protect communities and the environment from unacceptable harm of extraction and we would support a continuation of similar policy wording.</p>
LCC Green Infrastructure	<p>Existing policy MCS5 related to gypsum does not need amending.</p> <p>Paras 4.70 and 4.71 suggest that there are only two potential areas/sites for future extraction. As such, these should</p>

Team	be identified within the Plan.
Council's Response (Qu.15): Policy amended to identify specifically the areas where Gypsum extraction would be acceptable.	
Question 16: Building and roofing stone	
Northamptonshire County Council	Current policy adequate but should amend where necessary to reflect findings of the EH strategic stone study.
Mountsorrel Parish Council	Use of Mountsorrel granite as a building stone can be supported from the Buddon Wood Quarry. The only other local stone of importance is Swithland Slate and there could be a demand for a local source for high grade conservation work if sufficient slate cannot be sourced by reclamation.
Leicestershire Quarries Vision Project	Probably not. The most valued of the various stones is Swithland slate and it is possible in the foreseeable future that this might need to be produced again once the recycled supply from agricultural buildings is exhausted. The sites/areas are very limited.
Mike Shearstone	I am surprised that there is no proposal to encourage quarrying of Building Stone from the "indigenous Ironstone" reserves within the county. The existing Core Strategy Policy relating to building stone (MCS6) needs amending to facilitate the quarrying of potential ironstone for building, from or adjacent to the site(s) of previous surface quarries which can meet current environmental standards, in relation to access, visibility, noise, dust, etc. And on balance offer a sustainable benefit to the community over alternative imported stone or brick. Using this criteria specific sites or areas could be identified as potential sources of indigenous building stone. Clause 4.93 emphasises the need to identify original sources of building stone.
LCC Highways	Response similar to that for Q4 in terms of likely levels of future demand should inform a review. Not qualified to give a view on where any new sites/areas should be identified.
LCC Green Infrastructure Team	Existing policy MCS6 related to building roofing stone suggests that stone should only be worked for use within the county. Given that vernacular building styles are generally regional, is it necessary to cover situations where cross-boundary use (subject to the same criteria) may be appropriate? Given the use caveats in the existing policy it seems unnecessary to identify sites/areas.
Mineral Products Association	We disagree with the current policy on building stone (MCS6). Whilst the adopted policy displays a commendable willingness to support the heritage use of building stone it does not unfortunately, cover everything the industry needs and therefore in our view does not provide for a steady and adequate supply of minerals in accordance with NPPF. Our objection to the adopted policy revolves around the assumption that building stone quarries must be dedicated to heritage uses. The adopted policy does not in our opinion provide a realistic prospect to encourage new dimension stone operations and needs to be substantially amended. We therefore suggest a new policy along the following lines: "The County Council will support the extraction of natural building and roofing stone for both new build and

	architectural heritage purposes where environmentally acceptable."
English Heritage	The Leicestershire Strategic Stone Study was published in April 2012 and provides a detailed analysis of building stone types within the County. Reference to this document should be made within the Local Plan, as well as forming part of your evidence base.
Council's Response (Qu.16) Policy amended to indicate the circumstances where proposals for the extraction of building and roofing stone would be acceptable. Reference is made to the Leicestershire Strategic Stone Study.	
Question 17: Coal	
Northamptonshire County Council	May need to be amended to reflect 'positive planning' instead of a presumption against development.
UK Coal	Policy MCS7 should be amended to reflect para.149 of the NPPF. In particular, the presumption against coal extraction should be deleted and "national benefits" should be added to the policy to reflect the importance of coal as part of the UK energy mix.
UK Coal	The Company supports the Council's intention to identify the broad extent of the coal resource area within Leicestershire. Site specific proposals cannot be formulated until the site has been geologically evaluated. It is therefore suggested that specific proposals are considered on their merits.
Coal Authority	Policy MCS7 was based on national planning policy set out in the former MPG3, where a presumption against coal extraction existed in policy. The NPPF has introduced a new positive policy stance towards coal extraction in paragraph 149. As such the policy wording of the former core strategy policy would need to be amended for inclusion in the Local Plan, it would be inappropriate for it to be rolled forward into the new Local Plan without amendment. The Coal Authority suggests wording changes for consideration to reflect national planning policy in the NPPF.
Coal Authority	<p>The issues document suggests in paragraph 4.77 that 'areas of protection' will also be shown on the adopted policies maps produced by District Council in the County once they have been identified through the preparation of their Local Plans.</p> <p>It is unclear what is being referred to, however it will be inappropriate for District Local Plans to contain any policies which specifically impose constraint on mineral proposals. If District or the County Plan were to propose the use of constraint areas in which to resist coal extraction then The Coal Authority would challenge those policies or designations to public examination. If the reference means purely that the District Plans will include mainstream policies relating to the protection of built and natural environment features then these will equally apply to all minerals proposals, so it should not be mentioned specifically relating to coal.</p> <p>The Coal Authority would welcome clarification of what is meant by the term 'areas of protection' and would also welcome an early discussion on the issue with the MPA to avoid any unnecessary misunderstanding and/or confrontation through the plan making process.</p>

Coal Authority	<p>The Coal Authority generally supports a flexible policy approach towards future energy mineral extraction. This will allow the flexibility to adapt to changing circumstances over the plan period based on the economic conditions, the fluidity of the national and international energy market and proposals for UK energy security and plan for future energy production. On that basis we consider that is normally most effective to avoid the allocation of specific sites or the designation of areas of search unless these still allow for flexibility over the plan period.</p> <p>Whilst the NPPF suggests in paragraph 147 that plans should indicate areas where coal extraction and the disposal of colliery spoil may be acceptable, The Coal Authority consider that this objective can be equally met through use of a criteria based policy. The Coal Authority would agree that in general terms the only technical or commercial information available relating to the quality and extent of the reserves to enable the identification of specific areas, is that held by the industry or was investigated by the former British Coal many decades ago.</p> <p>The Coal Authority would agree that illustrating the broad extent of the surface coal resource within the County on the Policies Map would be appropriate. The issues document in paragraph 4.77 uses the term 'opencast', this refers only to a single method of extraction and the Local Plan should utilise the modern terminology of 'surface coal mining' and 'surface (or shallow) coal resource' instead in order to be consistent with practice across other MPAs, the industry and regulation.</p>
Leicestershire Quarries Vision Project	Coal is being progressively phased out. The restoration of open cast workings has improved enormously. It is probably not worth committing any more resource than the bare minimum.
LCC Highways	Extent to which the policy on coal is reviewed has close linkages with national energy policy. Not qualified to give a view on where any new sites/areas should be identified (if needed).
Charnwood Borough Council	Policy MCS7 has a list of criteria to take into consideration. It is therefore considerably more detailed than the above policy for gypsum. Unless there are specific coal related criteria it could be more appropriate to cross reference to a generic set of criteria.
LCC Green Infrastructure Team	<p>Existing policy MCS7 related to coal does not need amending, unless there is any need to refer to national need for coal.</p> <p>Para 4.76 states that LCC does not have the necessary technical/commercial information to identify specific areas for coal extraction, so the answer to the second question must be no, apart from the identification of the broad extent of the opencast area as per para 4.77.</p>
Measham Parish Council	The policy should be amended to take into consideration the anticipated projected future decline in demand for coal for power generation purposes. Please refer to the attached briefing document "Assessing the need for coal" produced by LAON.
UK Coal Producers	The core strategy for coal is acceptable. Identification of specific sites is difficult and might preclude some prior extraction opportunities. It would be better to merely publish the near surface coal resource locations from the latest Coal Authority data base which uses information from the BGS.
Council's Response (Qu.17) The plan indicates that proposals for the extraction of coal will be determined in accordance with the NPPF and includes a policy indicating	

particular matters that will be taken into account when assessing such proposals. No specific sites are identified but the extent of surface mining potential area is shown on accompanying Mineral Safeguarding Plans.
'Areas of protection' relate to mainstream policies to protect the built and natural environment which would apply equally to all minerals proposals and not specifically coal. Use of the terminology 'opencast' has been avoided.

Question 18: Oil and Gas

Northamptonshire County Council	Current policies are adequate.
Environment Agency	The existing Core Strategy policies are appropriate.
Coal Authority	The Core Strategy currently contains two policies on hydrocarbon resources MCS8 on oil and gas, and MCS9 on new energy production technologies. The issues document correctly identifies the need from the Planning Practice Guide on Onshore Oil and Gas to illustrate the PEDL licence areas in the plan together with existing hydrocarbon extraction sites. These exist in northern Leicestershire. The Coal Authority as a body sponsored by DECC supports compliance with this guidance. Policy MCS9 in the Core Strategy sets out a framework to address all new coal technologies effectively with sufficient flexibility as required by paragraph 147 of the NPPF. The policy could be rolled forward unchanged. It may be appropriate for a single policy in the Local Plan to address both conventional and unconventional hydrocarbon extraction as the policy considerations are broadly the same.
Leicestershire Quarries Vision Project	Correct typo in 4.79. Fracking is a new opportunity, knowledge is limited and experience of permissions is so limited that it is amazing that each mineral authority is expected to construct its own plan. A request for national plan should be made so as to economise on resources. Is every mineral authority expected to invent the wheel?
LCC Highways	Extent to which the policies on oil and gas are reviewed has close linkages with national energy policy. Not qualified to give a view on where any news sites/areas should be identified (if needed).
Charnwood Borough Council	Paragraph 4.80 states that there are currently 3 Petroleum Exploration and Development Licences covering parts of Leicestershire, namely an area which is located north east of Loughborough while planning permission for an exploration well near Burton on the Wolds has recently been granted. We also note that a study by the British Geological Survey of shale gas reserves published in June 2013 identifies a prospective area in the Lower Bowland Holder and within the Widmerpool Basin to the North East of Loughborough. Closer inspection suggests that the reserves are located largely in Nottinghamshire but the fact that there is considerable public interest in shale gas, and there is likely to exploration and extraction over the coming years, means that more specific reference in the plan, together with the plans intended response to this issue, is merited.
LCC Green Infrastructure	Existing policies MCS8 and MCS9 related to oil and gas and to new energy production technologies do not need amending.

Team	
Friends of the Earth	<p>Friends of the Earth object to the failure to include in the issues document with regard to unconventional onshore oil and gas development the following issues:</p> <ul style="list-style-type: none"> -The failure to consider climate change as informing the key issues as required by the National Planning Policy Framework and the amendment to the Planning and Compulsory Purchase Act 2004 (amended by Planning Act 2008); -The failure to consider the precautionary principle as required by the Water Framework Directive, and the need to set a limit on water extraction in line with environmental limits; -The failure to include mapping to ensure that groundwater sources and sensitive sites are protected from development; -The failure to set out clearly the information required for the different types and phases of development, and also the conditions to be expected on these developments including restoration. <p>Friends of the Earth suggests an in principle policy approach together with a suggested policy.</p> <p>The planning authority must recognise the unconventional and untested nature of exploration and extraction for onshore oil and gas, and therefore cannot assume that proposals will be allowed without citing the precautionary approach, the risk of unacceptable adverse impacts, and the need to mitigate climate change. The planning authority otherwise risks failing to protect the public interest or to make sound planning decisions.</p> <p>Definition of site boundary must include (in 3-D) the full extent of any horizontal drilling underground.</p>
Leicester Friends of the Earth	<p>Leicester Friends of the Earth believe that Policy MCS9 needs to be amended to ensure that the council is able to fulfil its duties in relation to climate change mitigation and to take account of the precautionary principal in regards to groundwater contamination. Suggest wording to replace MCS9.</p> <p>Friends of the Earth recommends that minerals development frameworks should include a specific policy on the application of the precautionary principle to all applications on fracking - which means that unless it can be proven that there will be no groundwater contamination the development should not go ahead.</p> <p>Particular impacts that may result from shale gas exploration and extraction activities include:</p> <ul style="list-style-type: none"> - Transport movement (increased congestion and damage to road surfaces from heavy vehicles transporting drill cuttings, drilling waste water, fracking fluid, and flowback water) - Water use (the amount used in the activity, particularly in areas of water shortage) - Air pollution (leakages of methane) - Migration of contamination from the site (leakages of polluted water, including naturally occurring radioactive materials (NORMs)).
UK Coal Producers	Part A - No; Part B - Don't know.
Carlton Parish Council	Policies relating to oil and gas extraction need to be updated to take account of the new technology of 'fracking'. Since the relevant shale reserves will be widely distributed, the location of any drilling sites for exploration and extraction will not be severely constrained by the location of the resource. Policies should be developed to control the location of

	such facilities with reference to existing infrastructure, transport links, and impacts on the natural environment and residential areas. Are existing regulations and testing procedures adequate to ensure the protection of subsurface aquifers from boreholes used for oil and gas exploration and production?
Egdon Resources UK	<p>We consider that the second criterion of Policy MCS8 is potentially both unduly restrictive and ambiguous. It requires any operator to demonstrate that the chosen site has the least impact, even if it satisfies criterion 1. Whilst the importance of selecting suitable sites that minimise adverse environmental and social impacts is acknowledged, this needs to be balanced with the fact that minerals can only be worked where they naturally occur.</p> <p>The third criterion implies that an exploration well site would automatically lead to the full appraisal and development of the resource, which is not always the case. This is also not in line with current national planning practice guidance for onshore oil and gas which recognises the three phases of onshore hydrocarbon extraction: exploration, testing (appraisal) and production.</p> <p>We consider that Core Strategy Policy MCS8 should be amended to provide a more inclusive and positively worded policy that fully reflects the Government's current guidance for onshore oil and gas. We consider that Policy M9: Energy Minerals in the Draft Lincolnshire Minerals and Waste Local Plan (November 2013) is a good example of a more inclusive and positively worded policy that supports the Government's aim of fully exploiting the potential of hydrocarbon resources in order to fulfil economic sustainability, whilst balancing the needs of local communities and protection of the environment.</p> <p>We consider that the study conducted by the British Geological Survey related to the potential volume of shale gas in the Bowland Basin and beyond has not sufficiently been reviewed or incorporated into the proposed strategy, given the recognised potential resources that are considered of national and economic importance. It is considered that the Core Strategy requires amending in order to consider in more detail the opportunities presented by shale gas in the Leicestershire area.</p> <p>We consider that Policy MCS9 is superfluous since 'new energy production technologies' (including shale gas) could be included within an amended Core Strategy Policy MCS8.</p> <p>Egdon Resources U.K. Ltd, would like to promote the Bowland Basin for the potential for shale gas resources.</p>
Council's Response (Qu.18) Extant policies on 'oil and gas' and 'new energy production technologies' have been merged. Amenity and environmental protection are covered by other policies within the Plan.	
Question 19: Existing mineral safeguarding policies	
Northamptonshire County Council	May need to expand MCS10 to include mineral processing facilities as per NPPF (if not addressed through another policy).
Coal Authority	Policy MSC10 set out the broad approach towards mineral safeguarding and safeguarded deposits of a variety of minerals including shallow coal and fireclay. It will be necessary to reconsider the minerals to be safeguarded to include those minerals of 'local and national importance' as prescribed in paragraph 143 of the NPPF.

	<p>The policy wording of MSC10 would also need to be reworded to remove reference to 'current or future economic importance' as that related to considerations in the former MPS1 and the MPS1 Practice Guide. The NPPF contains no reference anymore to economic importance being a factor to influence mineral safeguarding. Instead the NPPF clearly sets out in paragraph 143 that geological fact stated as 'known locations' is the basis to determine the approach to mineral safeguarding.</p> <p>Policy MCD8 in the Core Strategy then went on to set out implementation criteria for considering non-mineral development in MSAs. This policy remains broadly suitable, although inclusion of allocated sites in other plans as 'exempt development' needs to be reconsidered. This should only be the case where the site allocation process has already considered the impact on mineral sterilisation and considered prior extraction. Unfortunately this is not tending to be the approach adopted by District Councils and as such exclusion of allocated sites will result in the unnecessary sterilisation of mineral resources contrary to the NPPF.</p> <p>Policy MCD9 in the Core Strategy went on to promote prior extraction, this remains generally in line with the advice in paragraph 143 of the NPPF. It may be more helpful if the approach towards mineral safeguarding was to be included in a single policy as opposed to three separate policies.</p>
Mountsorrel Parish Council	<p>The existing policies do not need amending but they do need to be enforced to stop housing development near to quarries. Development in Mountsorrel not far from the Buddon Quarry has limited the long term options for future generations.</p>
Leicestershire Quarries Vision Project	<p>Sustainability should be mentioned, although the existing policy would probably already be classed as "sustainable".</p>
Hinckley & Bosworth Borough Council	<p>The safeguarding of mineral resources prevents the loss of known economically viable mineral deposits from built development. It also prevents development encroaching on mineral workings to protect both the amenity of occupants and the loss of mineral resource where a buffer would be required between the extraction and the development. Development proposals which lie within a Mineral Safeguarding Area (MSA) are required to undertake further assessment to identify the value of the resource and whether prior extraction is required.</p> <p>The Borough Council notes that the County Council had intended to delineate the boundaries of MSAs within the county more precisely in preparing its site allocations development plan. The Borough Council would welcome this work being undertaken by the County Council to assist in the assessment of development proposals which may/may not lie within or adjacent to MSAs and whether further investigation or the extraction of mineral resources is required prior to development taking place.</p>
National Forest Charitable Trust	<p>It is important for the Trust to ensure that land that is transferred to it in accordance with the section 106 agreement can be used for its intended purpose and is not blighted by being "safeguarded". It is currently understood that any clay remaining on the land (at Donington Island) to be transferred to the Trust will effectively be of no value given the uneconomic cost of dealing with its high sulphur or carbon content.</p> <p>To be absolutely sure of the position it would however be helpful if MDC8 could be amended by adding the following as an additional bullet point: "the site has been restored in accordance with a restoration plan approved by the MPA".</p>

LCC Green Infrastructure Team	Existing policies MCS10, MDC8 and MDC9 related to safeguarding mineral resources do not need amending.
Lafarge Tarmac	The policies and approach to minerals safeguarding should be amended to reflect the guidance within para 142 of NPPF. Therefore to include concrete batching plants, coated roadstone plants and other ancillary development.
UK Coal Producers	No. We are pleased to see that the concept of prior extraction is included.
Mineral Products Association	Policy MCS10 could be improved by the addition of the words 'from unnecessary sterilisation' after the word safeguard in the second bullet point of the policy. Policy MDC8 could usefully include a reference to the need for developers in an MSA to provide a suitably detailed Mineral Assessment as part of their proposals. No change is recommended to Policy MDC9.
Hanson UK	Mineral safeguarding policies appear in general to remain valid, but weight should be placed on the requirement of Local and District planning authorities to consult the Mineral Planning Authority within MSAs and MCAs.
Council's Response (Qu.19): The minerals indicated in the existing policy already include those of 'local and national importance' within Leicestershire. The policy has been amended to remove reference to 'current or future economic importance' and make reference to a fuller list of 'exempt development'. The approach towards mineral safeguarding is included in a single policy as opposed to three separate policies. Reference is made to the submission of Mineral Assessments.	
Question 20: Mineral safeguarding areas	
Northamptonshire County Council	Current policy adequate but should amend where necessary to reflect findings of the EH strategic stone study.
Coal Authority	The issues document in paragraph 4.89 indicates that the County Council intends to safeguard shallow coal amongst other minerals including fireclay. The Plan will need to reflect on paragraph 143 of the NPPF which prescribes the minerals to be safeguarded to include those minerals of 'local and national importance'. Coal is a mineral within this definition and as such should continue to be safeguarded. The issues document goes on to indicate that the data issued by The Coal Authority on surface coal resources should form the evidence base for the definition of an MSA covering this resource. This is the evidence base that has been promoted to other MPAs and it would be consistent for Leicestershire to utilise this, particularly in order to ensure cross-boundary consistency with Derbyshire and Nottinghamshire. The County Council propose to follow the methodology as set out in the BGS/The Coal Authority Practice Guide, we would obviously support that approach. The Coal Authority does not see any requirement to safeguard deep coal resources as these are not generally subject

	<p>to sterilisation by non-mineral surface development. The Coal Authority notes that the only time where safeguarding deep coal resources may be necessary is in licensed extraction areas, where highly sensitive surface development can sometimes lead to sterilisation of working faces and approved extraction areas. There are no licensed areas in Leicestershire.</p> <p>The Coal Authority would agree that it is not necessary to specifically safeguard either conventional or unconventional hydrocarbon resources. Those new coal technologies will effectively be safeguarded partially through the safeguarding of the surface coal resource. Hydrocarbon extraction generally has a degree of flexibility in where surface plant can be sited; it is not therefore subject to the same rigour of other minerals in that they can only be extracted where they exist.</p> <p>The issues document does not identify the need to also designate Mineral Consultation Areas (MCA) based on the MSAs. This is required by paragraph 143 of the NPPF, and is imperative in two-tier areas such as Leicestershire. Paragraph 4.99 of the issues document suggests that the delineation of the precise boundaries of the MSAs will be undertaken as part of the accompanying Site Allocation DPD. The Coal Authority considers that it is imperative that the MSAs and accompanying MCAs are defined and illustrated on a Policies Map as soon as possible. This is vital to ensuring that the issue can be properly taken into account by the District Councils in plan and decision making. If using the Site Allocations DPD would lead to any delay in the designation process and implementation then The Coal Authority would object.</p>
Mountsorrel Parish Council	The area of outcropping and near surface Mountsorrel Granite should form part of a MSA. Extension of the Buddon Wood Quarry after 2031 is very limited to the west by Swithland Reservoir and planned housing to the southeast. Long term safeguarding of a larger area may allow underground mining of the granite at depth within the MSA. Further work to establish the potential for underground mining should be carried out. Detailed evidence at this stage is not available.
Leicestershire Quarries Vision Project	Probably not.
Mike Shearstone	Although I agree Jurassic ironstones have no continuing economic significance for iron production, they can be of economic benefit as a part of "sustainable development" and building our future. A good start would be to include the area between Eaton, Eastwell and Goadby Marwood on the Belvoir escarpment on your Key Diagrams Figure 2 (Other Construction Materials Spatial Map), as containing Jurassic Ironstone deposits.
Charnwood Borough Council	Figure 2 of the Minerals Core Strategy currently shows a very large area north east of Loughborough labelled as Gypsum Resources. It is questionable that safeguarding such a large area serves a useful planning purpose, particularly bearing in mind that the likelihood of development as referred to above is likely to be within a more limited geographical area.
Mineral Products Association	We believe the existing MSAs shown on the Core Strategy Key Diagrams to be comprehensive. However, it is vital that the County Council produces a more detailed map of MSA boundaries as soon as possible since important mineral sites are already coming under pressure from speculative housing applications which the lack of a defined MSA is not helping to relieve.

Hanson UK	The Key Diagrams are not considered to be sufficiently accurate, therefore a review of the MSAs should be undertaken through consultation process.
Council's Response (Qu.20): Plan is accompanied by maps with details of MSAs for each borough/district.	
Question 21: Buffer zones around resource areas	
Northamptonshire County Council	Yes, as stated in para 4.96, i.e. 200m S&G, 500m Limestone.
Coal Authority	The Coal Authority has no strong views on the use of buffer zones around resource areas. The methodology behind their concept is sound, in order to protect the resource from proximal development that may lead to sterilisation. This is considered to be an issue more imperative for other resources such as hard rock where blasting is required.
Mountsorrel Parish Council	Buffer zones should be created around the resource area of the Mountsorrel Granite to allow for future extensions and prevent development such as housing sterilising the resource. Buffer zones should be established around the quarries, stockpiles, crushers, other plants, conveyors and railheads to allow for future expansion and to reduce noise, dust, vibration and smell to adjacent housing. Buffers should be a minimum of 500m for quarries and crushers (normally 1000m) and a minimum of 100m for other quarry related activities.
Leicestershire Quarries Vision Project	Yes. The buffer should be specific to each site as judgement on individual cases will need to be exercised.
Charnwood Borough Council	It is noted that buffer zones are already shown on the proposals map. Their size should reflect the potential impact of mining upon neighbouring land uses which is likely to vary according to the nature of mining and extractive activities.
LCC Green Infrastructure Team	Yes, with buffer width as currently specified at para 4.96.
Measham Parish Council	Support the principle of buffer zones including coal extraction as a category. Until local authorities produce their local plans to identify areas to be protected and size of buffer zone we can't comment.
UK Coal Producers	A buffer zone would be desirable around safeguarded minerals, the extent of which should be determined on a case by case basis and might differ for housing, industrial or commercial premises or public amenity.
Mineral Products Association	It is best practice using BGS advice for buffers to be built in to MSA boundaries in order to guard against sterilisation from proximal development. The suggested distances are 200 m for sand and gravel and like materials and 500 m for crushed rock.
Hanson UK	Yes, buffer zones are important, and should be a minimum of 250m for minerals.
Blaby Parish Council	We agree a buffer should be added to the resource boundary at least as great as those set out in para. 4.96.

Council's Response (Qu.21): Plan includes provision for buffer zones around resource areas.	
Question 22: Safeguarding within built up areas	
Northamptonshire County Council	Only define in urban areas where there is a realistic chance of prior extraction associated with large redevelopments e.g. large industrial locations / regeneration projects.
Coal Authority	<p>The Key Diagram for the Core Strategy did not exclude any designated areas or urban areas from the Coal MSA, the same approach should be rolled forward. The 2011 BGS/The Coal Authority Practice Guide indicates that MSAs should not be constrained or curtailed by other designations or urban areas. It specifically advises how mineral resources such as coal are acceptable for safeguarding in urban areas. That is the practice which other MPAs have followed across the coalfield. The Coal Authority would strongly object to any proposal to exclude urban areas from the MSA and would seek the Local Plan to be found unsound on that basis.</p> <p>In question 22 it is proposed to exclude urban areas from MSAs, this is unnecessary and is not justified. The Policy approach does not comply with National Planning Policy the National Planning Policy Framework. Nowhere in National Planning Policy is there identified that a different approach to mineral safeguarding should be pursued in urban areas to elsewhere. To the contrary the NPPF clearly states that MSAs should cover 'known locations of specific minerals resources of local and national importance', this indicates that they should be fact based. The NPPF makes it clear that MSAs should be based upon geological considerations and that prior extraction should be promoted where non-mineral development will take place on mineral resources. The issues document seems to be resisting defining the MSAs within the Urban Area purely for the reason that prior extraction is unlikely to occur.</p> <p>To try and exclude urban areas from Mineral Safeguarding Areas is wholly false and fails to reflect the requirements of the NPPF to safeguard minerals as far as possible. The approach being proposed for Leicestershire is now incompatible and inconsistent with the approach being pursued in other coalfield areas, including other similar rural two-tier Counties such as Nottinghamshire and Derbyshire.</p> <p>Leicestershire have not demonstrated any distinctive reasons as to why a different approach is justified to elsewhere in England. The MSA for the surface coal resource should be amended to cover the whole geological resource across the DPD area without exception. The Coal Authority considers that there is no clear evidence to indicate that prior extraction is not feasible, realistic or justified in urban areas. Prior extraction of surface coal can readily take place on very small sites in urban areas without any adverse environmental impacts.</p>
Mountsorrel Parish Council	It is unlikely that hard rock quarrying would be permitted within the built up areas of Mountsorrel because of the extreme disruption that it would cause to the local community. Whole scale relocation of the village is a nightmare scenario.
Leicestershire Quarries Vision	It might be beneficial, especially from the sustainability viewpoint, for sand and gravel, and perhaps clay, Mineral Safeguarding areas to be in or close to built-up areas. For example, Watermead Park and Charnwood Water are both

Project	successful recreational areas which benefit from being close to population centres. They filled a need during extraction and both now fill a "lung" function for the adjacent population, together with increasing bio-diversity. It is a pity that the restoration costs were not met by people that made money from the extraction, something that should be made more difficult in the future.
Charnwood Borough Council	It does not seem appropriate to include safeguarding areas within existing built up areas.
LCC Green Infrastructure Team	Yes, agree that Mineral Safeguarding Areas should not be defined within the urban and other built up areas of Leicestershire. (Presumably this would not prevent surface extraction during large regeneration projects or on brownfield sites if this was economically viable and met other policy criteria?).
Lafarge Tarmac	We agree, would be unnecessary.
UK Coal Producers	No. It may be that re-development of urban and built up areas offers the opportunity for prior extraction of mineral before the re-build which could enhance site stability and permanently remove legacy risk.
Carlton Parish Council	Should mineral safeguarding areas be defined in urban areas in order to highlight the potential for extracting minerals, such as shallow coal, beneath regeneration projects and brownfield sites? Yes.
Mineral Products Association	I'm afraid we cannot agree that MSAs should not be defined within urban areas. Best practice advice from the BGS indicates that for minerals like sand and gravel which are shallow allowance should be made for possible prior extraction on redevelopment sites, significant undeveloped areas and major urban extensions. In addition, washing MSAs through urban areas makes it easier to avoid questions about what is an urban land use, avoids the need for constant revisions to boundaries and can be easily managed by the adoption of exemption criteria to sieve out irrelevant applications.
Council's Response (Qu.22) Mineral extraction within urban areas in Leicestershire is likely to be limited, but that circumstances could arise where the extraction of shallow coal would be viable. MSAs therefore exclude mineral deposits other than surface coal within settlements with a population over 1000 and an area over 20 hectares.	
Question 23: Safeguarding associated infrastructure	
Northamptonshire County Council	May need to expand MCS10 to include mineral processing facilities as per NPPF (if not addressed through another policy).
Mountsorrel Parish Council	Some of the associated infrastructure, such as conveyors, in Mountsorrel is adjacent to housing and causes problems of noise, dust and vibration. The railhead at Barrow is also very near housing with similar problems. These examples show that safeguarding areas around quarry infrastructure is important in reducing problems in the future. Stockpiles create wind-blown dust and should have down-wind safeguarding areas to alleviate this problem. Problems with air quality in Mountsorrel are caused by the nearness of the existing plant to residential areas.

Leicestershire Quarries Vision Project	Rail links are already included, but, since most aggregate travels by road, often close to populated areas, important road links (particularly connecting to possible future urban safeguarding areas) should also be included.
LCC Highways	Whilst mineral sites remain in operation, the highway authority would not wish to see the loss of any existing transport infrastructure necessary to ensure a site's safe and sustainable (in transport terms) operation.
LCC Green Infrastructure Team	Rail links are particularly important and should be safeguarded.
Lafarge Tarmac	Yes - railheads, ancillary development. As per previous comments should be in accordance with guidance within NPPF.
UK Coal Producers	We agree that rail infrastructure should be maintained and preserved in working condition.
Cemex	Any ancillary mineral operation should be safeguarded.
Mineral Products Association	The question of safeguarding associated infrastructure will be a matter for our members to comment on.
Council's Response (Qu.23): Policy included in Plan to safeguard associated mineral infrastructure.	
Question 24: Municipal Waste Data	
Northamptonshire County Council	Yes.
Rutland County Council	Yes.
Environment Agency	We agree that the council should use its own data regarding municipal waste.
Mountsorrel Parish Council	Councils own data should be used. Figures after 2008 may be artificially low because of the decline in economic activity.
Leicestershire Quarries Vision Project	Since the Councils are responsible for most of it, their data should be used as the starting point and then adding to it where possible.
Charnwood Borough Council	We would support the use of the Council's own data on municipal waste arisings. Leicester City Council's own planning and waste management arrangements may have implications for facilities in the County and this should be acknowledged.

New Earth Solutions	<p>Whilst the UK has made great strides towards decoupling economic growth and waste arisings, New Earth believe that a positive correlation remains. There is an inherent danger in relying upon historic data, particularly where it spans a relatively short period, in this case 2008- 2012. This period coincides with the economic recession. Household consumption may well be on the verge of increasing as the economy comes out of recession and enters a period of growth. New Earth suggests that a cautious approach be adopted and look at a range of scenarios, informed in part by the Council's dataset.</p> <p>New Earth would emphasise that figures for waste arisings are not the same as required capacity. This is particularly true for recovery capacity, whereby new technologies have led to multiple tiers of processing and an increasingly sophisticated market place. Thus there is an inherent danger of under provision of capacity. There is also a need for flexibility to allow for new and emerging technologies and the prospect on transitional periods. Furthermore it is important to note that not all sites / consents will be delivered or come forward in a timely fashion.</p>
Biffa Waste Services Ltd	On the basis that the Council's own data is the most up to date and accurate then it is right to use it as a starting point for future projections.
Lafarge Tarmac	It appears sensible for the County Council to use its own collected data.
Cemex	Agree.
Blaby Parish Council	We suggest the best possible data should be used, if the data held by the County Council are the best available then those should be used.
Council's Response (Qu.24): Council's municipal waste data has been used as the starting point for projecting future municipal waste arisings.	
Question 25: Municipal Waste Growth	
Northamptonshire County Council	Growth rates should align with the municipal waste management strategy.
Rutland County Council	Growth rates should align with the municipal waste management strategy.
Environment Agency	Legislative drivers may counter-act the impact of increased households to maintain a reducing trend towards a zero growth rate. However, the recent economic downturn may have contributed to this too and therefore the impact of any future economic recovery on the amount of waste in general should also be considered.
Mountsorrel Parish Council	Increased population growth should be used to estimate future arising after allowing for increased recycling.
Leicestershire Quarries Vision Project	At the present time zero growth is the most sensible assumption.

New Earth Solutions	New Earth is concerned that a zero growth rate might underestimate waste arisings. Further to discussions with the Waste Disposal Authority, New Earth had understood that municipal waste arisings are likely to increase by 0.5-1% per annum from 2013. As a minimum New Earth would expect to see sensitivity testing of a range of scenarios - which at the lower end might well include a zero growth scenario. New Earth would also like to see a more transparency in the presentation of underpinning projections for household growth to 2031, as well the drivers for reductions in waste arisings. It is noted that significant growth is planned, aptly demonstrated by Blaby District Councils recent decision to grant permission for 4,250 new homes at Lubbesthorpe.
Biffa Waste Services Ltd	Paragraph 3.6 of the plan identifies that household numbers in Leicestershire are projected to increase by 10% by 2021 and by a further 11% (my calculation) by 2031. By assuming zero waste growth the plan is effectively assuming a reduction in municipal waste production by individual households. This may or may not be achievable. Whilst zero growth is an ideal we would suggest that future arisings assume a number of scenarios perhaps by using a 1% and 2% increase. By using Leicestershire's own figures on arisings the various scenarios can be tested going forward and the Plan adjusted.
Hinckley & Bosworth Borough Council	Whilst any further work to underpin future modelling will be a matter for waste industry experts, it is recommended that LCC undertake a review of projected waste arisings and consider the outputs of projected housing demand from the emerging SHMA. This will ensure the most up-to-date and robust projections (from a 2011 baseline) are taken into account to inform the overall provision to be made, consistent with emerging and future Local Plans throughout the County.
Lafarge Tarmac	We do not believe that zero waste growth is a realistic target. Historic figures need also to reflect the economic recession over the past five years. It stands to reason that household consumption will have reduced during this period of time and will be expected to increase as the economy continues to improve. Furthermore, anticipated increase in house building (para 3.6) will inevitably lead to an increase in municipal waste generated. It would be sensible to provide a range of growth scenarios.
Cemex	Yes but a method of monitoring would be beneficial to assert if the approach is correct through the plan period.
Council's Response (Qu.25) A number of scenarios are presented in the updated Waste Needs Assessment of which the mid-range growth scenario is used to predict arisings.	
Question 26: Municipal Waste Recycling and Recovery Rates	
Northamptonshire County Council	Waste management targets should align with the municipal waste management strategy, national policy and European directives.
Rutland County Council	Waste management targets should align with the municipal waste management strategy, national policy and European directives.
Mountsorrel	Existing targets of 59% by 2017 and 79% by 2020 should be kept.

Parish Council	
Leicestershire Quarries Vision Project	<p>The principle of sustainability is that filling a present need should not jeopardise the needs of future generations. They do not necessarily have to be the same needs. If they were they almost any use of mineral resources would be unsustainable. For any surface extractions some method of restoration is necessary and sustainability requires that it meet a future "need". One obvious need is to accommodate future waste arisings in the voids left by mineral extraction. This used to be done (and is why Minerals and Waste planning often go together) but the current Landfill Tax makes it uneconomic. For a county such as Leicestershire, which extracts a larger volume of hard rock than it produces as waste, this makes no sense. What is needed is a rebate on the Landfill Tax for "restoration landfill". However, such a rebate would require a change in primary legislation. The alternative would be to impose a swingeing increase in the Aggregate Levy so as to make the operators pay the future Landfill Tax on the landfill required to fill their void, something that would be "green", and would require no change in primary legislation. Since Leicestershire does not produce enough waste on its own, perhaps the trains that export the aggregate could return filled with waste for landfill?</p>
New Earth Solutions	<p>The Plan should be ambitious and contain policies pursuant to the waste hierarchy. New Earth acknowledge Leicestershire County Council's success in diverting waste away from disposal through recycling and composting, but are concerned that further progress is being, and will continue to be, hampered by the current diversion target of 79%. It is important to remember that this should be regarded as a minimum, but New Earth that it is not always interpreted this way. As such, there is a risk that a target might be counterproductive, serving to frustrate the delivery of new capacity that would otherwise increase levels of diversion. It is evident that whilst recycling and composting capacity has come forward apace, only limited recovery capacity has been delivered despite demand from the Waste Disposal Authority (as expressed through the terms of recent contract awards). Thus it is respectfully suggested that the Plan should either avoid setting a target or aim very high. If minded to set a high diversion target, the precise % should have regard to proven technical solutions and financial viability. It is New Earth Solutions experience that 90% of municipal residual waste is capable of being diverted from disposal at a similar or lower cost than landfill. The Plan should also recognise that incineration (EfW) is also a form of disposal unless it satisfies the R1 co-efficient.</p>
Biffa Waste Services Ltd	<p>There should be no limit on the rate of landfill diversion and the Plan should not seek to put in place policies that make provision only for new non landfill capacity to achieve a set target. Given the level of investment required for new waste management facilities, the market will not over provide in this situation as is often feared. This point was debated during the preparation of the Staffordshire Waste Local Plan. As a result the adopted Plan was amended to be more explicit about maximising landfill diversion and not appearing to cap it.</p>
Lafarge Tarmac	<p>The Plan should seek to achieve as high a rate of landfill diversion as is achievable. What is important is that the Plan does not seek to set targets that limit the rate of landfill diversion.</p>
Cemex	<p>Any deviation would need to be quantified by a valid set of statistics.</p>

Blaby Parish Council	We should be seeking to achieve rates of landfill diversion which are at the top end of those achieved by the best authorities nationally.
Council's Response (Qu.26): Current targets from the Municipal Waste Strategy have been retained.	
Question 27: C&I Waste Arisings	
Northamptonshire County Council	No. ADAS survey shows inconsistencies with previous surveys in relation to inclusion / exclusion of certain waste types and C&I sectors (i.e. businesses with less than five employees) – making direct comparison of datasets difficult. Adjustment to the figures can be made to allow for comparison with national datasets e.g. allowance for businesses with less than five employees (ADAS concludes 5% for the East Midlands).
Rutland County Council	No. Please refer to Rutland Core Strategy DPD for adopted waste capacity requirements and Waste needs assessment (Nov 2010) for waste arisings forecasts, in particular paras 1.16 (3rd bullet point), 1.21, 1.23 to 1.26, 1.31 to 1.33, Table 1.2(g-h).
Environment Agency	The plan should be ambitious and seek to exceed national targets to demonstrate a move away from "business as usual". Interestingly, the "Towards Zero Waste - Waste Strategy for Wales" has set a target of 70% by 2025 for C&I waste.
Leicestershire Quarries Vision Project	Agreed. It is the best estimate.
New Earth Solutions	<p>New Earth is concerned that the figure of 815ktpa may under-represent the true picture as the UK emerges from recession and enters into a period of economic growth. It is important to recognise the different stages of the economic cycle - and to an extent this may well account for the wide divergence between the Regional Plan projection (which were based on 2002 survey data) and the ADAS / Defra projections (published in 2009 / 2011 respectively). Whilst there has been some success in decoupling the link between economic growth and waste arisings, New Earth believes that a positive correlation remains.</p> <p>A precautionary approach should therefore be taken and it might be prudent to consider taking an average (i.e. 68% of the average of the DEFRA, ADAS and Regional Plan projections for the sub-region) or test a range of scenarios. New Earth would emphasise that figures for waste arisings are not the same as required capacity. This is particularly true for recovery capacity, whereby new technologies have led to multiple tiers of processing and an increasingly sophisticated market place. Thus there is an inherent danger of double counting, potentially leading to the under provision of capacity. Furthermore it is important to note that not all sites / consents will be delivered or come forward in a timely fashion - E.g. Biffa's Shephed EfW which is listed as 'Dormant' in Appendix 1 of the Issues Document. This is particularly true of recovery facilities treating C&I waste owing to (i) the high capital cost of building such facilities, (ii) the short term nature of C&I contracts and (iii) the fragmented nature of the market. There is also a need for flexibility to allow for new and emerging technologies and the prospect on transitional periods.</p>
Biffa Waste	Looking at the figures, this seems the most appropriate starting point.

Services Ltd	
Council's Response (Qu.27): Suggested figure has been used as the starting point for projecting future C&I waste arisings.	
Question 28: C&I Waste Growth	
Northamptonshire County Council	Yes, unless locally based economic data is available to base projections on.
Rutland County Council	Yes, unless locally based economic data is available to base projections on.
Leicestershire Quarries Vision Project	Yes. DEFRA is the authority on these matters.
New Earth Solutions	New Earth acknowledge the inherent difficulties in forecasting C&I waste growth and consider the Defra rates to be a pragmatic starting point. New Earth would however encourage sensitivity testing and a flexible policy approach that is capable of responding to fluctuations in need over the life of the Plan.
Biffa Waste Services Ltd	Forecasting future C&I waste growth is fraught with difficulty but the DEFRA rates of a reduction in commercial waste of 0.2% and an increase in industrial waste of 0.57% to 2031 is the most up to date and considered approach. C&I waste arisings are very sensitive to the economic climate and these rates may well change as the recession comes to an end and will also be influenced by increasing household numbers. It is important that there is regular monitoring of arisings to ensure that the growth figures are checked and amended if necessary.
Lafarge Tarmac	C&I data is well documented as being unreliable. Whatever targets are used they should be treated with an element of caution. Minimum targets could create a false ceiling. Given the high level of capital investment required for any new waste management facility there is unlikely to be a major over provision irrespective of targets that are set. The focus should be on supporting and securing deliverable, waste management facilities when sustainable development is proposed through planning applications. The current locational policies are too rigid and are proving to be counter-productive in supporting waste management proposals which are demonstrably sustainable development.
Council's Response (Qu.28): The rates published by DEFRA have been used to project the future C&I waste arisings.	
Question 29: Recycling of C&I Waste	
Northamptonshire County Council	Agree with use of 50% however application of targets for C&I waste may not be realistic as this is outside of the County's control – largely dictated by commercial contracts and market / wider policy drivers and so may not be achievable / realistic or supported by sufficient evidence.
Rutland County	Agree with use of 50% however application of targets for C&I waste may not be realistic as this is outside of the

Council	County's control – largely dictated by commercial contracts and market/wider policy drivers and so may not be achievable / realistic or supported by sufficient evidence.
Mountsorrel Parish Council	Recycling rates should be kept at 50% rising to 58% by 2031.
Leicestershire Quarries Vision Project	Recycling is only one part of sustainability. Unless it fills a "need", it is the unnecessary consumption of resources. However, if it fills an immediate need, such as the recycling of metals, then it is obviously sustainable. In general, an increase in recycling is beneficial but not if unnecessary recycling is undertaken solely to meet an arbitrary goal.
New Earth Solutions	New Earth considers that the landfill tax escalator has created a level playing field for the treatment of Municipal and C&I Waste streams. This has superseded the distortion created by public sector targets and initiatives such as LATs (now defunct). Whilst there are undoubtedly economies of scale in the collection of municipal waste, it is evident that the C&I sector is presently well catered for when it comes to recycling; with an established network of transfer and dry recycling sorting facilities across Leicester and Leicestershire. Greater attention needs to be afforded to the delivery of additional recovery capacity, which often includes an element of 'second chance' recycling. With the above in mind, New Earth believes that a common minimum recycling target of 58% by 2020 should be identified.
Biffa Waste Services Ltd	Acknowledging these are minimum figures with no maximum set then this is agreed.
Lafarge Tarmac	Provided that these figures are minimum targets and not used to prohibit new recycling capacity if minimum recycling rates have been achieved then the approach is supported.
Cemex	Agree.
Council's Response (Qu.29): In light of comments on evidence, new data suggests a slightly lower recycling figure for 2031 is more appropriate.	
Question 30: C&D Waste Arisings	
Northamptonshire County Council	Agree with use of WRAP study data however consideration should be given to waste arisings identified through plans for both Rutland and Leicester city where available to ensure consistency.
Rutland County Council	Adopted Core Strategy applies a rate of 3.6% of the Leics/Rutland sub-region to determine Rutland's CD&E waste from national data. Refer Waste needs assessment (Nov 2010) paras 1.38 to 1.39. This should be taken into consideration when determining starting point for predicting CD&E wastes.
Leicestershire Quarries Vision Project	Although it is only an estimate, it is probably the best estimate that can be made at this time without wasting resources on producing more-accurate figures.

Council's Response (Qu.30): Estimate calculated from WRAP study has been used as the starting point for predicting future C&D waste arisings.

Question 31: Future C&D Waste Arisings

Northamptonshire County Council	Yes, agree with zero % growth for CD&E wastes.
Rutland County Council	Yes, agree with zero % growth for CD&E wastes.
Leicestershire Quarries Vision Project	Yes, but the figure should be reviewed every few years.

Council's Response (Qu.31): No rate of change has been applied to C&D arisings.

Question 32: C&D Waste Recycling

Northamptonshire County Council	Yes, targets should align with national policy and EU directives (e.g. WFD target of reusing, recycling and recovering a minimum of 70% of C&D waste by weight by 2020). At minimum, current rates should be applied. Higher rates may be difficult to deliver especially for individual wpas as waste streams such as C&I and CD&E are driven by commercial contracts and market / wider policy drivers and so may not be achievable / realistic or supported by sufficient evidence.
Rutland County Council	Yes, targets should align with national policy and EU directives (e.g. WFD target of reusing, recycling and recovering a minimum of 70% of C&D waste by weight by 2020) at minimum current rates should be applied. Higher rates may be difficult to deliver especially for individual waste planning authorities as waste streams such as C&I and CD&E are driven by commercial contracts and market wider policy drivers and so may not be achievable/realistic or supported by sufficient evidence.
Environment Agency	The Waste Framework Directive sets a target that by 2020, the preparing for reuse, recycling and other material recovery, including backfilling operations using waste to substitute other materials, of non-hazardous construction and demolition waste excluding naturally occurring material defined in category 17 05 04 in the list of waste shall be increased to a minimum of 70% by weight. This is reflected in the consultation draft of the Waste Management Plan for England.
Mountsorrel Parish Council	A minimum recycling level of 52% should be kept, rising to 58% by 2031.
Leicestershire Quarries Vision Project	This question is best answered by the principle of sustainability. The present generation should reduce its needs where they degrade the opportunity of future generations to fill their needs. Consequently, as much C&D waste should be recycled as is practicable. Restoration of exhausted mineral sites is a legacy issue. It requires the present generation to

	repair the damage done by previous generations filling their needs and is an extension of the sustainability principle. This was understood by those who introduced the Aggregate Levy but not by those who took that part of it which used to go to restoring historic minerals sites.
Lafarge Tarmac	Minimum figures are only appropriate as a guide of performance but should not be adopted or used to prevent further waste recycling and recovery capacity being developed, providing that such development is sustainable.
Cemex	Agree.
Mineral Products Association	In our view the more waste that can be recycled as aggregate, the better. In addition, it is important for the industry to capture as much material as possible for the recycling of land (quarry restoration). Therefore, the best available information should be used to project the likely capacity of recycling facilities. The quantity of C&D waste which goes to landfill or into exempt sites should be minimised. Accordingly, the quantity which is beneficially used in quarry restoration should be maximised.
Council's Response (Qu.32): Continuation of 52% recycling has been used as minimum target for C&D waste.	
Question 33: Hazardous Waste Arisings	
Northamptonshire County Council	Yes.
Rutland County Council	Yes.
Environment Agency	We agree that separate provision for hazardous waste is made in the plan. We would be happy to work with the council to ensure that the most recent data held by us is used and that its limitations are fully understood. Due to time constraints we have not checked figures reported in the consultation document that were derived from our waste data.
Mountsorrel Parish Council	There should be a separate provision in the Plan.
Leicestershire Quarries Vision Project	Yes. If data is easily available then it makes sense to use it.
Cemex	Agree.
Council's Response (Qu.33): Separate provision has been made for hazardous waste in the plan.	
Question 34: Hazardous Waste Growth	
Northamptonshire County	Yes.

Council	
Rutland County Council	Yes.
Leicestershire Quarries Vision Project	Yes. But the background to this question indicates the nonsense of each local authority researching for figures when this function is much better done by a national authority.
Cemex	Agree.
Council's Response (Qu.34): An annual increase of 0.57% has been applied to hazardous waste arisings up to 2031.	
Question 35: Agricultural Waste	
Northamptonshire County Council	Yes.
Rutland County Council	Yes.
Leicestershire Quarries Vision Project	Yes. It is not worth the resources to do any different.
Council's Response (Qu.35): The approach to calculating the level of agricultural waste as set out in the issues document has been adopted.	
Question 36: Radioactive Waste	
Northamptonshire County Council	Yes, should address development control criteria in the event that an application for such a facility is brought forward.
Rutland County Council	Yes, should address development control criteria in the event that an application for such a facility is brought forward.
Environment Agency	Although the Environment Agency has no strategic role in respect of solid low level radioactive waste (LLW) disposal capacity, we would support the consideration of radioactive waste management in your local waste plan. The plan could, as a minimum, recognise and reflect the key principles identified in the Government's LLW strategy which is referred to in the local plan issues document. The level of detail required should be proportionate to the amount of radioactive waste arising in Leicestershire (trivial when compared to conventional waste) and it may be helpful to recognise the possibility of future commercial interest in radioactive waste management facilities in Leicestershire.

Mountsorrel Parish Council	A specific policy should be written to address the disposal of low level non-nuclear radioactive waste originating in Leicestershire.
Leicestershire Quarries Vision Project	Whilst the principle of inclusivity might seem to justify this approach, the principle of sustainability requires that the present generation does not waste resources on things that do not need to be done. So, no.
Carlton Parish Council	One problem is the exaggerated public perception of the danger posed by low-level radioactive waste.
Council's Response (Qu.36): The Plan contains a specific policy on radioactive waste.	
Question 37: Disposal of Waste to Landfill	
Northamptonshire County Council	Targets for landfill should align with MWMS, national policy and EU directives. At minimum, current disposal rates should be applied.
Rutland County Council	Targets for landfill should align with MWMS, national policy and EU directives. At minimum, current disposal rates should be applied.
Environment Agency	We have not checked figures reported in the consultation document that were derived from our waste data, however, the discrepancy mentioned in section 5.31 may be due to the fact that origin data is not mandatory. For your information we estimate non-hazardous waste landfill life based on dividing the void by total non-hazardous waste inputs.
Leicestershire Quarries Vision Project	Although disposal of waste to landfill can be defined as sustainable (under closely prescribed circumstances) there is a delay between completion of extraction of winnable material and the commencement of landfill. At the current time, the sites available for landfill are a legacy of the past. If restoration by landfill is to be undertaken then there needs to be a match in annual tonnages such that once one of the current super quarries becomes available there is a fairly seamless transfer from one site to another. This raises an unasked question. Should landfill be concentrated on one site, so that the site is restored quickly, or should multiple sites be used so as to reduce vehicle miles?
New Earth Solutions	Whilst recognising that there might still be a need for landfill capacity, the plan should aim to push waste up the hierarchy away from disposal. The availability of landfill capacity should not therefore be used to frustrate recovery capacity. It is considered that the tests set out in Policy WCS7 continue to be appropriate. New Earth believe that the discrepancy highlighted in para 5.31, is likely to be indicative of cross boundary movements of waste in and out of the County. Furthermore it is unclear whether disposal by means of incineration (out of County) has been taken into consideration?
Biffa Waste Services Ltd	Only residual wastes should be disposed of at landfill sites but this plan should not seek to set a limit. Waste inputs to landfill are reducing year on year and this is a result of fiscal policy (landfill tax). This has significantly increased the cost of disposal encouraging a reduction in waste production and has made the costs of developing alternative methods

	of waste management more financially attractive.
National Forest Company	The NFC considers that the demand for landfill capacity within the County cannot be assessed until the current discrepancy between predicted and actual landfill rates is addressed.
Lafarge Tarmac	It is agreed that there is a continuing role for landfill. However, it is possible that inputs will decline as a consequence of the landfill tax which has significantly increased the cost of disposal. With this in mind we believe that there will be increased demand for waste management uses higher up the waste hierarchy. Therefore the Plan should aim to push waste up the hierarchy. It is not appropriate to set targets for the level of waste disposed of to landfill. It is the role of the policies in the plan to support the delivery of a range of waste recycling and recovery facilities to meet the needs within the plan area.
Blaby Parish Council	We believe targets should be set to show a year on year decrease in waste going to landfill.
Council's Response (Qu.37): The landfill target is reduced over the plan period but this is a maximum not a minimum.	
Question 38: Waste Management Provision	
Northamptonshire County Council	Yes, agree that the plan should provide sufficient capacity to manage the equivalent of the waste which arises within the area - check EA dataset exports Rutland to Leics.
Rutland County Council	Yes, agree that the plan should provide sufficient capacity to manage the equivalent of the waste which arises within the area.
Environment Agency	We have not checked figures reported in the consultation document that were derived from our waste data. We would be happy to work with the council to ensure that the most recent data held by us is used and that its limitations are fully understood.
Mountsorrel Parish Council	Yes. The plan should make provision for sufficient waste management facilities to handle the waste arising within the County and cooperatively with neighbouring counties.
Leicestershire Quarries Vision Project	If every county plans to provide waste facilities for its own waste, then, on balance, there will be enough facilities. Ideally, agreements would be reached between neighbouring counties but this is not absolutely necessary. So, yes.
Surrey County Council	Firstly we agree with the waste movements set out in tables M to T, excepting that we are unable to verify the waste movements for the year 2010 from the Environment Agency Waste Data Interrogator (EAWDI) for that year. There are no movements recorded that we can identify from the EAWDI. However, the EAWDI for 2012 indicates that waste movements from Surrey were in the same order, if somewhat less, compared to those you identified for 2010 for 2011. We are therefore satisfied that the information you provide is accurate. Further, we consider that due to the small scale of these waste movements any differences between the figures would not in any event be material. We have no hard information to comment on whether circumstances could lead to a change in waste movements from

	Surrey to Leicestershire. However, our advice to you is that in our judgement it appears unlikely that there would be significant changes.
Sharnford Parish Council	Paragraph 6.7 in the current document presents the suggestion that the strategy should be to provide sufficient facilities to manage the equivalent to Leicestershire arisings. With this we would concur. What Leicestershire should emphatically NOT be doing is providing facilities for up to TEN times the County's own area, as would be the case if the Anaerobic Digester Plant at Sutton Lodge were to be allowed to go ahead. The 50 mile radius for sourcing represents nearly 8,000square miles and 20,000 additional HGV movements per annum through local communities.
New Earth Solutions	New Earth agrees that the Plan should make provision for sufficient infrastructure to handle the equivalent amount of waste arising in the County. In practice, it is recognised that cross-boundary movements will take place. The Plan should be premised on such movements being neutral. However, New Earth would also reiterate the fact that waste arisings should not be confused with required capacity. This is particularly true for recovery capacity, whereby new technologies have led to multiple tiers of processing and an increasingly sophisticated market place. Thus there is an inherent danger of under provision. For instance Biffa's Wanlip AD facility in Leicestershire is capable of taking material from Biffa's Leicester Ball Mill. There is also a need for flexibility to allow for new and emerging technologies and the prospect that not all sites / consents will come forward or be delivered in a timely fashion. In some instances, waste facilities might be so specialised, so as to require a more strategic or even national approach. The Plan needs to be flexible enough to consider any such proposals.
Biffa Waste Services Ltd	The plan should make provision to manage an equivalent amount of waste arising in the County as a starting point but regard will need to be had to the proximity of the City of Leicester, existing contractual arrangements, and the Duty to Co-operate with both Leicester City Council and other authorities. Certain waste management facilities are only suitable in more rural areas hence some wastes will need to be exported from the urban areas for management. For example, the Wanlip AD plant, whilst being located in Leicestershire was constructed as part of the Leicester City Municipal Waste contract.
Derbyshire County Council	The approach set out under the 'Duty to Co-operate' in relation to strategic waste movements is supported. However, it should be recognised that this is an on-going requirement rather than a 'one-off' matter.
Lafarge Tarmac	We agree that the Plan should make provision for sufficient waste management facilities to handle the levels of waste arising within the County. However, regard will need to be given to cross boundary movements in particular Leicester City Council and other adjoining local authority areas.
Cemex	Although waste crosses the County boundary it is important to focus on the Counties own facilities and waste and to build in an element of flexibility for cross boundary movements of waste. It would be politically and strategically awkward to accommodate and assess cross boundary movements and capacity.
English Heritage	Whilst we have no detailed comments to make on this, any levels and location of sites to tackle waste management provision should be carefully balanced against the environmental capacity of the area, in order to achieve sustainable

	development, in accordance with NPPF paragraphs 14 and 152.
Council's Response (Qu.38): The Plan proposes that provision be made for sufficient facilities to deal with the levels of waste arising in Leicestershire.	
Question 39: Hazardous waste Provision	
Northamptonshire County Council	Yes.
Rutland County Council	Yes.
Environment Agency	We have not checked figures reported in the consultation document that were derived from our waste data. We would be happy to work with the council to ensure that the most recent data held by us is used and that its limitations are fully understood. Hazardous waste is generally produced in relatively smaller amounts and therefore it would be more economically viable to have specialist facilities regionally or nationally. The county is in a central location with good transport links for it to be a hub for hazardous waste if it so wished.
Mountsorrel Parish Council	Yes. The Plan should make provision for sufficient hazardous waste treatment facilities to handle levels arising within the County.
Leicestershire Quarries Vision Project	The final sentence of 5.38 is excellent. Leicestershire is not an island and waste sites near the county boundary will obviously attract imports just as Leicestershire might export material. Furthermore, the lower the tonnages the less the importance the vehicle miles. Also if a site is suitable for a particularly specialised waste then it makes economic (and sustainability) sense to extract the maximum value from it. If a site can handle hazardous waste then lower value waste should not be disposed of there.
Redcar & Cleveland Borough Council	While we would welcome an aim of self-sufficiency, we recognise the need for some export of waste due to market forces and the need for specialist waste management, including to Redcar & Cleveland. We are unaware of any reasons why the future export of waste to the Teesport No. 3 site would be unable to continue.
Council's Response (Qu.39): It is proposed that provision be made for sufficient facilities to deal with the levels of hazardous waste arising in the County.	
Question 40: Strategic Waste Sites	
Northamptonshire County Council	Yes.
Rutland County Council	Yes.
Environment	Section 4.17 of the existing Waste Core Strategy describes the characteristics of strategic sites. We believe that

Agency	<p>strategic sites should play a key part in pushing waste up the waste hierarchy and maximising the use of any by-products.</p> <p>We support initiatives to recover residual waste which aim to maximise its benefit as a resource in a safe and environmentally friendly way. However, it must be stressed that recovery as an option to divert waste from landfill should not undermine or by-pass the rest of the waste hierarchy, which gives priority to reuse and recycling over recovery and disposal.</p> <p>The value of the waste both as a source of quality material and of energy must be considered. We would want to see high quality materials derived from source segregated wastes finding markets as a resource, rather than low quality materials that need disposal with tight and restrictive regulation.</p> <p>Energy generating processes should recover as much energy as practicable, for example using Combined Heat and Power (CHP) schemes, consistent with the requirements of Best Available Techniques (BAT).</p> <p>Whilst the above points are addressed in WCS6 of the existing Waste Core Strategy, they are not referenced in WCS2, which specifically sets out the strategy for strategic waste sites.</p>
Mountsorrel Parish Council	The changes suggested in the issues document should be supported with strategic sites adjacent to the main producing areas thus reducing transport distances.
Leicestershire Quarries Vision Project	If a large facility would not be appropriate in Charnwood Forest, then why was permission granted for the Shepshed incinerator, especially when permission already existed for permission to landfill (and so restore to public amenity) Newhurst Quarry? Is a "waste facility" a landfill site? If so, then a decision not to have sites in Charnwood Forest (Regional Park) is a de facto decision not to use the option to restore them by landfill and some other use (a future "need" in sustainability terms) is necessary otherwise quarrying in the Forest is not sustainable and therefore there is no presumption in favour of any future extraction developments. Thus the answer to this question is much more complicated than it seems.
Charnwood Borough Council	We agree that strategic waste sites should be located in sustainable locations which are accessible to centres of population. We support the proposal to remove the Charnwood Forest area between Coalville and Loughborough / Shepshed as this is an environmentally sensitive area which should be afforded protection.
New Earth Solutions	<p>New Earth considers that the current approach to identifying strategic waste facilities is fundamentally flawed and cannot be remedied by means of the proposed clarifications to Policy WCS2 and amendments to the Key Diagram. The concept of strategic waste facilities is an artificial one and the current definition / characterisation vague. It is respectfully suggested that the term 'strategic waste facility' be reserved for situations where sites are to be identified and allocated within a Plan.</p> <p>The difficulties of identifying suitable sites in Leicestershire are well documented. At one stage Leicestershire County Council promoted a site at Bardon (located outside the Broad Locations) but in the event, the Bardon site was sold off for alternative uses leading to the collapse of the emerging Waste Site Allocations document. It is now proposed that the extent of the Broad locations be reduced; (i) through the exclusion of Leicester from the Plan Area and (ii) through the exclusion of the Charnwood Forest. New Earth believes that the current approach has failed to deliver any substantive recovery capacity within recent years.</p>

	<p>The tightening of the criteria within Policy WCS2 will in effect exclude the incremental development of established facilities that fall outside of the 'broad locations'. This can only serve to exacerbate the existing situation and frustrate the delivery of additional recovery capacity. One of the implications is continued reliance on landfill.</p> <p>To maintain the current strategy ignores the fact that the Local Planning Authority has allowed a network of municipal and C&I residual waste bulking and transfer stations to come forward. Such infrastructure is to be welcomed in so far as it offers a local delivery point and an initial reduction in travel distances. However, it is evident that owing a lack of recovery capacity in Leicestershire, the network of transfer stations has served to facilitate the transport of waste to out of county recovery facilities - this is true of both municipal and C&I arisings. With respect to C&I waste this will continue to be the case as businesses look not just to reduce exposure to the landfill tax escalator but look to fulfil their Corporate Social Responsibilities. New Earth is in touch with businesses in just this situation.</p> <p>Thus, New Earth respectfully suggest that policy WCS2 has become self-defeating and that this will be compounded by the proposed changes. As set out in New Earth's response to question 2, a fundamental review of the locational strategy is required.</p>
Biffa Waste Services Ltd	<p>We consider that the intent of WCS2 was clear and did not need any clarification. We do not consider any changes are necessary to the policy. We note that you intend to remove the Broad Locations of Search identified on the Key Diagram, one of which included land between Coalville and Loughborough/Shepshed. We also note that paragraph 5.41 states: "the Key Diagram could be improved through the removal of the Charnwood Forest area between the Coalville urban area and Loughborough/Shepshed...A large waste facility would not be appropriate in the Charnwood Forest". There is no mention anywhere in the text of the document of the valid planning permission for the 300,000 tpa Newhurst Energy Recovery Facility. The facility is large scale, in the Charnwood Forest and was considered acceptable by the Secretary of State when permission was granted on appeal in June 2012. We consider that a lack of recognition of this consent if very misleading to members of the public who may be reading the document.</p>
Hinckley & Bosworth Borough Council	<p>In seeking to make provision for strategic waste management capacity, it is noted that the County Council propose to maintain the approach as currently presented in Policy WCS2 of the existing Core Strategy. Strategic sites are defined as sites located near to the centres of high population density (Leicester City; Loughborough and Coalville) which will divert a significant proportion of MSW and / or C&I waste away from landfill by recovery processes (i.e. to generate heat and power). The Borough Council supports this approach for the majority of waste to be managed as close as possible to where it arises.</p>
LCC Green Infrastructure Team	<p>Generally agree that the Key Diagram should be amended so that the area of Broad Locations for Strategic Waste Management Sites does not cover any part of the Charnwood Forest area. However, there could be an issue here if landfill might be a potential means of quarry restoration within the area during the Plan period.</p> <p>The boundary of the Charnwood Forest area on the Key Diagram should be amended to be consistent with changes to this landscape character area boundary recommended by the Charnwood Forest Landscape and Settlement Character Assessment (2008) which has subsequently been agreed as the working boundary for the Charnwood Forest Regional Park.</p>

Lafarge Tarmac	<p>We believe that the current Waste Core Strategy Policy WCS 2 has failed to support and deliver substantive waste recovery capacity to divert waste away from landfill or to minimise waste haulage. This existing locational policy is flawed, as there is a lack of suitable sites available and being brought forward for development in the urban areas. As land use competition and environmental operating requirements increase this constraint on delivery will become more acute.</p> <p>The existing network of municipal and C&I residual waste bulking and transfer stations offer a local delivery point and an initial reduction in travel distances. However, owing to the lack of recovery capacity within the County, many of those transfer stations transport waste to out of county recovery facilities.</p> <p>We are uncertain from the consultation document of the latest position with the Newhurst Energy Recovery Facility and what role this will have during the next Plan period. Given the large scale size of the site and its potential capacity if fully developed it will clearly have some impact upon the number and delivery of facilities required over the next Plan period but this is not addressed in the consultation document.</p>
North West Leicestershire District Council	<p>If it is the intention that strategic waste sites should not be located within the Charnwood Forest area, as is clearly stated in paragraph 5.41, then any changes to the policy or text should reflect this. However, such an approach would not appear to be consistent with the existing Policy WSC12 (Charnwood Forest) which takes a more flexible approach. If it is the intention to continue in accordance with WSC12 then policy WSC2 should include a cross reference to WSC12 for the avoidance of doubt.</p>
Carlton Parish Council	It makes sense to locate strategic waste facilities in the main urban areas so as to minimise the transport of waste.
Cemex	Agree.
Blaby Parish Council	We agree Strategic Waste Sites need to be located in sustainable locations. However locating such sites in urban areas needs careful planning and consultation to ensure views of local communities can be fully taken on board.
<p>Council's Response (Qu.40) The Key Diagram has been amended as suggested in issues document. The Spatial strategy for locating waste sites remains directed towards the main urban areas.</p>	
<p>Question 41: Non-Strategic Waste Sites</p>	
Northamptonshire County Council	Yes.
Rutland County Council	Yes, support continued policy approach for smaller non-strategic waste facility sites in or close to the other main urban areas including Melton Mowbray.
Environment Agency	Policies relating to the extension of existing facilities should ensure such sites are appropriately located, and that the proposed extension will enable management of waste in accordance with the waste hierarchy, favouring proposals that move waste up the hierarchy. Opportunities to provide further environmental enhancements to existing facilities should

	<p>also be considered.</p> <p>Not all existing sites will be suitable. Opportunities for existing facilities in unsustainable locations to relocate to more sustainable areas should also be considered.</p>
Mountsorrel Parish Council	The policy should be clarified as suggested.
Leicestershire Quarries Vision Project	Yes. Clarification is always useful. Keeping waste streams separate is often beneficial. For example, biological waste is often best disposed of by biological methods.
Philip Sullivan	While policy WCS3 could explain the benefits of AD, it is essential that the requirements concerning sustainability are met. WCS3 should be specific in limiting the scale of rural AD plants to parish-based, as advocated by the council's ENABLE Steering Group. Further and of great importance, WCS3 should limit rural plants' source of inputs and disposal of outputs to a radius of five miles; and ensure that waste only is processed. This means that WCS3 should emphasise that no crops, such as maize, should be grown as a waste crop to feed AD plants. The council's policy concerning AD, WCS6, should be changed accordingly.
Frolesworth Parish Meeting	Policy WCS3 does need clarification. It should be specific in terms of the size of AD plants in rural locations and precise in ensuring requirements for sustainability are met as recommended by the ENABLE Steering Group. The plants' source of inputs and disposal of outputs should be limited to a short transportation radius. The council's policy concerning AD, WCS6, should be changed accordingly.
Sharnford Parish Council	<p>The suggestion, in Para 5.43, that a countryside location may be appropriate for an AD Plant because the arisings are principally in the countryside is manifestly untrue if the arisings are in fact being sourced from an 8,000 mile catchment area.</p> <p>Para 5.44 suggests that current strategies might well benefit from amendment and this is probably true but we would suggest that such amendment should be to the effect that developments should be aimed at providing facilities to deal with LOCAL arisings and only exceptionally to act in cooperation with NEIGHBOURING Authorities - NOT seeking to provide facilities that may be TEN times the County's needs.</p>
Charnwood Borough Council	We agree with the rationale for amending the wording to anaerobic digestion and its potential for farms in rural areas. However, policy changes should be worded to ensure that environmental impacts are fully taken into account as part of the decision making process.
New Earth Solutions	<p>New Earth believes that a fundamental review of the locational strategy is required.</p> <p>New Earth is extremely concerned at the proposed change to Policy WCS3 set out in paragraph 5.42 of the Issues Document. The proposed change to bullet (vi) would in effect exclude additional capacity being brought forward at established facilities outside of the 'broad locations', ignoring the inherent merits of such sites. With respect to recovery capacity, New Earth believes that that such a narrow approach ignores the inherent merits of co-location with established facilities and that it is only likely to lead to a continued reliance on landfill and out of county recovery facilities.</p> <p>New Earth contends that the County Council appear to be reinterpreting the intent of the policy without any sound</p>

	justification. New Earth would not dispute the County Council's comments on the preferred location of AD facilities, as set out in paragraph 5.4.3, but would point out that operating recovery facilities with dense urban areas can also be challenging. This is perhaps best illustrated by the fact that LCC felt unable to support a time extension to the operation of Baker's Waste's MRF at Glenn Parva.
Biffa Waste Services Ltd	The proposed change to this policy that recognises anaerobic digestion facilities would benefit from being located in rural locations is agreed.
Hinckley & Bosworth Borough Council	<p>For non-strategic (smaller) waste management sites such as those suitable for recycling and waste transfer facilities, it is noted that the County Council propose to maintain the approach set out in Existing Core Strategy Policy WCS3. The Borough Council considers that there is merit in reviewing Policy WCS3, notably the necessity to include bullet points (ii) and (iii) which state:</p> <p>"The strategy for non-strategic waste sites is to locate them in the following areas taking into account the principles set out in Policy WCS4: Waste Location Principles:</p> <ul style="list-style-type: none"> (i) the Broad Locations for Strategic Sites indicated in the Key Diagram; (ii) in or close to the main urban areas of Hinckley or Melton Mowbray; (iii) within sustainable urban extensions". <p>The Borough Council considers that the policy approach presented in bullet points (ii) and (iii) could preclude further opportunities for other non-strategic facilities to come forward elsewhere, particularly as significant housing growth is to occur throughout Leicestershire over the Plan period. The Borough Council suggest that the strategy and policy for the provision of non-strategic waste management capacity should be informed by the projected growth requirements from the emerging SHMA and subsequent Local Plans. Any reference to specific locations should be informed by evidence to justify their inclusion, for example the deliverability of sites within the intended location through a site search and appraisal process.</p>
Acorn Recyclers	<p>The proposed revision of the locational policy for non-strategic waste sites (Policy WCS 3) is not supported. Existing small scale waste management sites outside the main urban areas make a small but valuable contribution to the overall network of waste facilities across the County. Such sites should be safeguarded as they promote the sustainable management of waste and also minimise 'waste' miles.</p> <p>The revisions proposed to bullet point (iv) in adopted Policy WCS 3 will restrict existing operating sites from expand during the plan period, unless they are in the main urban area. This favours larger urban sites over smaller rural sites. This will mean that existing sites outside the main urban areas cannot contribute to meeting the increasing waste recovery/recycling targets set out elsewhere the emerging Local Plan and thus will be prejudiced from investing and expanding. Such sites benefit from existing infrastructure, markets and personnel which will be adversely affected by this policy in the long term. The revised policy will therefore inhibit investment and job creation on existing sites in the rural area in the future which is contrary to the County Economic Strategy to support established local businesses.</p>
LCC Green Infrastructure Team	Agree that greater clarity is needed through reference to AD.

Lafarge Tarmac	We do not agree with the proposed change to bullet point (iv). There are clear sustainable benefits in the co-location with established facilities. We are concerned that the amendments are being sought in order to reinforce the failed approach of securing waste management facilities within the urban area. The supporting text to Q.41 outlines the amenity impact of AD recovery facilities. It is our experience that these challenges exist for all waste management uses and establishing such uses within the urban area is often problematic. This is apparent with the refusal of planning permission of a large recovery facility within the urban area.
Blaby Parish Council	Agree.
Council's Response (Qu.41) The plan includes a separate policy on Anaerobic Digestion. The policy on non-strategic waste facilities allows developments outside the main urban areas.	
Question 42: Other Policies related to Waste Facilities	
Northamptonshire County Council	WCS8 (iii) should also include mineral extraction facilities in order to support restoration of such sites.
Rutland County Council	WCS8 (iii) should also include mineral extraction facilities in order to support restoration of such sites.
Environment Agency	With regard to policies WCS7 and WCS8, we recommend that priority should be given to the extension of suitable existing landfill sites.
Environment Agency	We support initiatives to recover residual waste which aim to maximise its benefit as a resource in a safe and environmentally friendly way. However, it must be stressed that recovery as an option to divert waste from landfill should not undermine or by-pass the rest of the waste hierarchy, which gives priority to reuse and recycling over recovery.
Leicestershire Quarries Vision Project	It might be sensible to redraft the policies to incorporate the principles of sustainability together with any other changes.
Sapcote Parish Council	It should be a clear requirement in the waste policy that disposals should only be accepted from within a short designated range. It is our view that AD plants should be located on sites with a proven adequate access system. We urge you therefore to adopt a waste strategy and guidelines which gives more rigorous consideration to catchment areas, site access and viability of processes rather than depending upon the dubious promises of applicants which cannot be substantiated and are in breach of existing protocols, best practice for the industry and local waste guidelines.
Sharnford Parish Council	Of particular concern to this Parish Council are those issues that reflect the environmental and amenity impacts of Waste Disposal facilities development. There appears to be very little emphasis on Authorities recognising the effect

	that new proposals may have on residential or environmental features. Some of those facilities which have in the past been granted permission on a limited basis which may have been tolerable, have quickly moved on and been given, often retrospectively, permission to expand far beyond what has proved tolerable (the Aston Flamville plant is a case in point). It should clearly be the case that such additional expansion should NOT be permitted without very full consultation with local Community leaders.
New Earth Solutions	<p>Policy WCS6 goes some way to recognising the multi-tiered nature of waste treatment and the increasingly sophisticated market for energy recovery. This is very much to be welcomed and will undoubtedly prove a feature of future developments.</p> <p>However it is considered that new technologies are also likely to give rise to other forms of 'end of waste' products from residual waste - including the manufacture of gasses and liquids for use as a transport fuels, for direct grid injection or for industrial applications. Such technologies should also be actively encouraged.</p> <p>Policy WDC5 relates to development within the Countryside. Whilst New Earth would not dispute the intent of the policy, it is considered that the supporting text should allow flexibility for temporary facilities where these are co-located and make use of mineral workings and landfill operations.</p>
Biffa Waste Services Ltd	We do not think any changes are required to the remaining policies.
Measham Parish Council	MPC are happy to see no plans for incinerators.
Friends of the Earth	<p>Friends of the Earth would wish to see, so called, waste treated as a resource and as such reduce some of the pressure for more virgin materials from within and without the county. This would in turn reduce the need for landfilling and incineration which correctly are at the bottom of the hierarchy. One major step forward would be comprehensive food waste collection and treatment further up the hierarchy including most importantly education and subsequent reduction of the wastage of food both domestically and in work places. Separated resources for which there is no immediate market could then be inert and could be held in a repository for use at a later date.</p> <p>The County Councils' policies should not be wasting resources in our so called waste stream by burning them within or outside the County.</p>
Leicester Friends of the Earth	<p>Leicester Friends of the Earth suggests that Leicestershire should only permit new or extended waste treatment or disposal facilities where it can be demonstrated that there would be no unacceptable impact on environmental quality or the quality of life of those living or working nearby taking into account any unacceptable cumulative impact.</p> <p>Leicester Friends of the Earth also suggests that waste should be treated as a resource and as such reduce some of the pressure for more virgin materials from within and without the county. This would in turn reduce the need for landfilling and incineration which correctly are at the bottom of the hierarchy. One major step forward would be comprehensive food waste collection and treatment further up the hierarchy including most importantly education and reduction of the food wastage both domestically and in work places. Separated resources for which there is no immediate market would then be inert and could be held in a repository for use at a later date.</p> <p>FOE objects to any mass burn incineration of resources in Leicestershire. Furthermore it should be noted that a fifth or</p>

	subsequent daughter-directive of the 1996 European Union Air Quality Framework Directive (96/62/EC) will legislate for the control of ultrafine emissions which will have a significant impact on incineration as a method of waste to energy conversion.
Council's Response (Qu. 42) Existing policies on 'non inert' and 'inert' landfill have been merged and amended to incorporate incineration (without any energy or heat recovery) so that one policy covers waste disposal.	
Question 43: Allocation of Sites	
Northamptonshire County Council	Where site specific allocations cannot be made it may be prudent to identify industrial or similar areas where waste development would be considered acceptable in principle in order to facilitate delivery of the capacity gap
Rutland County Council	Where site specific allocations cannot be made it may be prudent to identify industrial or similar areas where waste development would be considered acceptable in principle in order to facilitate delivery of the capacity gap.
Mountsorrel Parish Council	The proposal not to allocate new waste management sites is supported.
Leicestershire Quarries Vision Project	Yes, especially as no suitable ones have been put forward. As to possible new facilities, there may be an opportunity to restore much of the current Bardon void by landfill once the new pit becomes operational. Its transport links are exceptional and its capacity is enormous. It has to be made to fill a future need under the definition of sustainability - what is it to be?
LCC Highways	From a transportation perspective, a level of sites (existing and future) should be maintained such that the overall travel distances are minimised as far as is reasonably possible. Whilst travel to waste sites might (generally) take place outside of the journey to work peak, nevertheless these journeys still contribute to Leicester's and Leicestershire's Carbon footprint.
New Earth Solutions	<p>New Earth believes that the current locational strategy is too restrictive and needs to be revisited starting with a call for suitable sites for new or expanded recovery facilities.</p> <p>The current approach has failed to deliver any substantive recovery capacity. Notwithstanding the duty to co-operate, the proposed exclusion of Leicester from the Plan area would appear to present an opportunity to revisit the locational strategy. An assessment of potential sites should therefore be regarded as a critical part of the evidence base underpinning the locational strategy. Without this, New Earth fear that the Plan will be undeliverable and potentially unsound.</p>
Biffa Waste Services Ltd	We agree with the approach for the reasons set out in response to Question 26. In doing so it is very important that the plan correctly refers to already consented sites like Newhurst (see Question 40) and that there are policies in place to safeguard such sites (see Question 44).
Hinckley & Bosworth Borough Council	It is noted in paragraph 5.46 of the consultation document that the County Council does not intend to allocate sites for waste management use in the emerging Local Plan. The Borough Council is concerned that this approach, in conjunction with the proposed policy approach (in WCS3), will result in ad-hoc proposals. Whilst a strong policy

	<p>framework can defend inappropriate sites being granted planning permission, it would be would be beneficial to provide certainty to landowners and residents where the future waste management provision is to be made. This would also support the policy framework in defending against inappropriate proposals for waste management use.</p> <p>It is noted that paragraph 5.41 suggests that the supporting text to a revised Policy WCS2 could make reference that a site can be strategic either through a single development or through an agglomeration of a number of non-strategic developments occurring over time. If the latter is intended to be the preferred approach this would further necessitate the identification and allocation of sites to demonstrate deliverability and certainty.</p> <p>Policy WCS4 provides land use hierarchy such as favouring existing waste management sites first then various land uses with Greenfield sites considered last. Whilst co-locating facilities on existing waste management sites is acceptable in principle, it is considered that the MWLP should seek to make the necessary waste management provision, identifying those sites which could be extended for co-located uses.</p> <p>It would be beneficial if the County Council undertake a thorough site search and appraisal process to identify new potential waste management provision and explore the opportunities of extending or reconfiguring existing sites to increase capacity. The appraisal process should consider factors such as impact on amenity from the operational and vehicle movements to and from facilities; other highway impacts and environmental impacts. The Borough Council would welcome the opportunity to maintain dialogue with the County Council to identify which sites within the Borough may or may not be appropriate for such uses.</p>
LCC Green Infrastructure Team	As the earlier 'call for sites' referred to elicited few suitable sites, then the proposal not to allocate any such sites in the Plan seems reasonable.
Lafarge Tarmac	We believe that the current locational strategy is flawed resulting in policies which are too restrictive. This resulted in the Local Planning Authority being unable to consider suitable sites which had been put forward as part of the Site Allocations consultation and instead allocating a strategic facility at Bardon that fell outside the area of Broad Locations. The Local Planning Authority were therefore unable to move forward with a Site Allocations document due to a lack of suitable sites, based on the locational strategy within the Waste Core Strategy. The delivery of the Minerals and Waste Local Plan would therefore be at risk if it adopted the same unsound approach. The policies need to be capable of supporting sustainable development rather than constraining sustainable development on the grounds of rigid locational policy.
Cemex	Agree.
Council's Response (Qu.43) No waste sites have been allocated. Indicative figures show that, at present, sufficient capacity has been permitted to deal with MSW and C&I wastes.	
Question 44: Waste Sites Safeguarding	
Northamptonshi	Existing and permitted sites should be safeguarded (some sites may have permission but not yet be operational). This

re County Council	should include both encroachment from incompatible development as well as redevelopment of adjacent sites to an incompatible development / land use. This is because the outcomes from both situations would be similar with the new development potentially being impacted upon by an existing land use - the resulting land use conflict may impede future operations of the waste development.
Rutland County Council	Existing and permitted sites should be safeguarded (some sites may have permission but not yet be operational). This should include both encroachment from incompatible development as well as redevelopment of adjacent sites to an incompatible development/land use. This is because the outcomes from both situations would be similar with the new development potentially being impacted upon by an existing land use - the resulting land use conflict may impede future operations of the waste development.
Environment Agency	It is important that policies ensure sufficient buffering between conflicting development types such that they do not disadvantage each other, particularly with regard to amenity issues such as noise, odour and litter/dust (e.g. housing and waste management facilities). Compatibility/integration with policies in Local Plans of surrounding Local Planning Authorities will very important.
Mountsorrel Parish Council	Like mineral extraction sites, waste sites should be safeguarded from encroachment by incompatible development such as housing. District Councils should have this as a statutory policy. Redevelopment after reaching capacity should be allowed but not before.
Leicestershire Quarries Vision Project	Yes, but the principle should go further. The Shepshed incinerator is an example of what should not happen. In this case land on an existing waste site has been given permission for the construction of a new waste plant (i.e. the incinerator), whilst accepting that the adjacent quarries (Newhurst and Longcliffe) are not restored. Such action is against the principle of sustainability - no use has been found for the two voids and consequently they can fill no future "need". So, areas inside possible waste sites should be safeguarded as well as just the immediate neighbourhood.
Philip Sullivan	The proposed AD plant at Sutton Lodge Farm listed in appendix 2 should not be safeguarded. It was approved with the use of false and misleading information; consequently, planning approval should be revoked. Further, the application's Tesco led consortium proposes to transport waste from an area of around 8,000 square miles, involving at least seven other counties. This is in clear conflict with the NPPF.
Sapcote Parish Council	My Parish Council is concerned at the siting of anaerobic digestion plants at inappropriate locations within rural communities additionally, we consider that the justification for locating a plant on the B4414 at its junction with B4669 was based on false and misleading data provided by the applicant and this approval should therefore be rescinded. We would request that the B4114 site be removed from the local waste plan.
Frolesworth Parish Meeting	The proposed AD plant at Sutton Lodge Farm, Broughton Astley listed in appendix 2 should not be safeguarded. The 3 year period given for development under planning approval expired in November 2013 and an application for extension has yet to be considered by the County Council. This Parish, along with a number of others, will again object to the development which was only approved on marginal grounds with reference to false and misleading information. In particular the application proposed transporting waste from an area covering several other counties in direct contravention of minimising transportation and sustainability as stated in the NPPF.

LCC Highways	From a transportation perspective, a level of sites (existing and future) should be maintained such that the overall travel distances are minimised as far as is reasonably possible. Whilst travel to waste sites might (generally) take place outside of the journey to work peak, nevertheless these journeys still contribute to Leicester's and Leicestershire's Carbon footprint.
New Earth Solutions	Yes, New Earth believes that existing waste sites should be safeguarded from encroachment by potentially sensitive uses, albeit a blanket buffer would not be appropriate and each case should be considered on its merits.
Broughton Astley Parish Council	The Parish Council considers that the proposed Anaerobic Digester plant at Sutton Lodge Farm is in an inappropriate location within the rural community on the B4414 at its junction with the B4669. The potential effects on the increase in traffic in the surrounding villages could be harmful to the wellbeing of the residents, and put additional pressure on the already overloaded highway network. We also consider the transporting of waste from far afield (approx. 8,000 sq. miles) conflicts with the NPPF.
Biffa Waste Services Ltd	We completely agree that sites should be safeguarded in particular from encroachment. Biffa has a number of landfill sites that have historically been fairly remote from property but which have seen encroachment by both housing and industrial development. At a few of our sites area we are now completely surrounded by new development. We have experienced difficulties where landfill sites have been designed with phasing and restoration that minimises the environmental impact on existing property. On a number of sites, where we are now surrounded by housing we find ourselves unable to operate within our valid planning permissions and Environmental Permits without attracting complaints.
Hinckley & Bosworth Borough Council	The principle of safeguarding existing sites is acceptable to ensure that the current capacity or land use is not lost or redeveloped to another use and that a sufficient distance is maintained between a facility and other forms of development or sensitive land uses. This is particularly important where sites have been identified to provide for increased capacity to minimise the need to identify new capacity elsewhere. Sites should however only be safeguarded where they are operationally acceptable and do not result in adverse impacts on amenity or the environment, and as such should also be subject to the site appraisal process referred above. The Borough Council would again welcome the opportunity to maintain dialogue with the County Council to identify which sites within the Borough are appropriate for safeguarding, with the potential for co-location of uses if this is considered necessary.
National Forest Charitable Trust	The Trust is pleased to see that the ceasing of waste importation at the New Albion landfill site as per the existing planning permission is reflected in Appendix 1 Table L of the Issues Document. Given this acceptance that waste importation will cease in accordance with the planning permission it is therefore surprising that the New Albion site is on the List of Potential Waste Sites for Safeguarding. The Trust would request that the site is not included on a safeguarding list so that there is long term certainty for the development of the Heart of the Forest.
National Forest Charitable Trust	The Trust agrees that existing waste sites should be safeguarded but would wish to see the policy state that such sites will be removed from the safeguarding list once they have been reclaimed/restored in accordance with an approved planning permission.

Acorn Recyclers	The emerging Local Plan should safeguard all established waste management sites/uses across the County unless it can be shown that either there is no longer a need for the facility or the Site is causing environmental issues by virtue of its location.
Michael Lee	I would like to comment and indeed object to the question of the location of an anaerobic digestion plant just off the old Fosse Way by the Soar Bridge adjacent to the B4114/B4669 junction. The provision of a waste plant of this and any other nature at this location should be denied, and the existing consent rescinded. I would submit that not only should this site be allowed to remain as open countryside, and the current consent rescinded, but no future zoning or change of use should be permitted.
National Forest Company	<p>The NFC is concerned that such a Policy may lead to the delayed restoration of safeguarded sites. New Albion Landfill is also located within the Heart of the Forest and is now a non-conforming use being surrounded by publicly accessible woodlands and housing. The NFC is concerned that if the site was safeguarded through the Local Plan then any proposals for an early closure of the site and its early restoration to Forest-related uses may be seen as contrary to policy.</p> <p>If a policy is to be drawn up then it should specify that the early cessation of the approved use and the early implementation of a restoration scheme would not be considered as a development to be safeguarded against. If necessary, the applicant could be asked to demonstrate that the approved use is no longer implementable or viable to further evidence that safeguarding the site for its approved use would be of no benefit. The NFC is concerned that such a policy would lead to the mothballing of the site to ensure it safeguarded for future use. This would have a significant detrimental impact on the creation of the Heart of the Forest.</p>
Lafarge Tarmac	We agree that existing waste sites should be safeguarded by both encroachment and development. The failure of proper safeguarding can have severe consequences as evidenced at one of Lafarge Tarmac's non-hazardous landfill sites in Staffordshire where continued encroachment of housing development is now causing difficulties with operations and complaints from occupiers of newly built residential property.
North West Leicestershire District Council	The need to safeguard what are generally bad neighbour uses against other forms of development (either on or off-site) is considered to be a legitimate and appropriate planning tool. However, it should be made clear that any policy of safeguarding would only apply for as long as a site is continuing to operate within the context of an extant planning permission. In this way once a permission has been completed there is no suggestion that an extension (either physical or in terms of time) would be justified on the grounds of safeguarding. It is also suggested that any safeguarding should apply in respect of both encroachment and redevelopment as both potentially pose a threat to the successful continuation of permitted schemes.
Carlton Parish Council	Agreed.
Cemex	Agree. All permanent permission should be safeguarded with a minimum of 250m
English Heritage	We note the proposed sites to be safeguarded. Whilst we have no detailed comments to make on this, it is essential that environmental considerations for safeguarded sites are reflected in any future policies.

Council's Response (Qu.44): The plan includes a policy to safeguard existing and permitted waste facilities from encroachment and redevelopment.

Question 45: Model wording (sustainable development)

Northamptonshire County Council	It may not be necessary to include exact wording however some reference to the presumption in NPPF should be included.
Rutland County Council	It may not be necessary to include exact wording however some reference to the presumption in NPPF should be included.
Environment Agency	We agree that the model wording used by the Planning Inspectorate is appropriate.
Coal Authority	The Coal Authority would support the use of the model wording on sustainable development.
Mountsorrel Parish Council	The revised Plan should not include the Planning Inspectorate wording. The presumption in favour of development in the absence of a Policy is not acceptable in a rapidly changing world. The dangers of this approach have been seen in recent housing decisions where developers have been given planning permission regardless of local opinion and not been fought by the District Councils because of similar wording and the lack of a Local Plan. There are arguments in favour of taking decisions more quickly but these should be taken in a sustainable manner (i.e. planned) and not allowed through by a presumption in favour of development.
Leicestershire Quarries Vision Project	By its very nature, and depending on one's definition of "sustainability", mineral extraction is only "sustainable" with certain constraints. Once the material is gone, it is gone. It is indisputable that it satisfies a present need. But in the future that material is not there for future generations - which is unsustainable - unless the void left by removal of the material fills a predicted future "need". This means that the restoration plan is the most important part of a proposal - it makes the unsustainable, sustainable. With regard to a heavily quarried area like Charnwood Forest the model wording is unsuitable..."and to secure development that improves the economic, social and environmental conditions in the area". It is "in the area" which is unsuitable in that a significant proportion of the aggregate production in Leicestershire is exported quite large distances and thus it is hard to see how quarrying improves the "environmental conditions in the area". "in the area" is too restrictive a phrase if you want quarrying to continue. Adding wording throughout the Core Strategy stressing sustainability would obviate the need for the model wording.
Charnwood Borough Council	It has been our experience that the Planning Inspectorate expects to see the model wording included in the plan. The model wording has been included in the submitted Charnwood Core Strategy and we would recommend that you do likewise.
New Earth Solutions	Yes, New Earth would support the use of the model wording.
Biffa Waste	Agreed

Services Ltd	
LCC Green Infrastructure Team	There is no objection to the wording of the model policy, however existing policy wording regarding sustainable design (MDC2/WDC1) is also useful in setting out the actual measures that are required to minimise environmental impacts, including the need to protect and contribute positively to the character and quality of an area. It may be that these could be covered in the supporting text rather than forming part of the policy.
UK Coal Producers	The wording should be adopted.
RSPB	The RSPB supports the model wording recommended by the Planning Inspectorate.
Mineral Products Association	We agree that the revised Plan should include the model wording recommended by the Planning Inspectorate.
Council's Response (Qu.45): The plan includes an amended version of the model policy, incorporating reference to reducing the effects on climate change.	
Question 46: Sustainable development	
Mountsorrel Parish Council	Sustainable development needs to be carefully planned with a long term perspective. Extraction should be managed by assessing the future needs for minerals and attempting to match these with production from existing sites and proposals for new sites where these are inadequate. Similarly waste disposal and treatment should be planned over a long period to meet future needs.
Leicestershire Quarries Vision Project	In answers to previous questions, suggestions have been made about the definition of "sustainability" and how the Core Strategy might be modified to highlight why the Core Strategy is sustainable and what is needed to make developments sustainable.
Charnwood Borough Council	The Minerals Core Strategy drew attention to the economic benefits of mineral extraction including details of the numbers of direct and indirect jobs in the industry. This reference has not been updated in the new plan event but it is an important aspect of sustainable development.
New Earth Solutions	New Earth consider that the existing Core Strategy Policies do need to be re-visited in order to achieve sustainable development, primarily Policies WCS2 and WCS3 as they are likely to lead to a shortfall in recovery capacity. This in turn will result in continued reliance upon landfill and / or out of County recovery facilities. Neither scenario is considered economically, environmentally or socially sustainable.
Biffa Waste Services Ltd	We consider the policies do not need amending beyond that proposed but reserve any further comment for the pre-submission draft.
Lafarge Tarmac	We question the necessity of Policies MDC3 and WDC2 given that the policies are largely reflective of the NPPF. Policies MDC5 and WDC5 are very strongly worded and do not reflect the advice within Para 113 of the NPPF which states: "Distinctions should be made between the hierarchy of international, national and locally designated sites, so

	that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological importance." Given that there are no areas of countryside/landscape of international or national importance within Leicestershire Policies MDC5 and WDC5 should be amended to reflect the local context of protection that should be provided.
UK Coal Producers	No.
RSPB	The RSPB is concerned about the proposed deletion of Policies MDC2 and WDC1 (Sustainable Design). Without these policies the Plan would have practically no policy-level text relating to climate change.
English Heritage	We consider that the existing policies relating to the historic environment require amendment in order to achieve sustainable development and to accord with the requirements of the NPPF for the historic environment.
Council's Response (Qu.46) Existing policies MDC2 and WDC1 (Sustainable Design) have been replaced by an overarching policy addressing sustainable development (DM1). Existing policies MDC3 and WDC2 have been replaced by a new policy covering the historic environment (DM8). Existing policies MDC5 and WDC 5 have been replaced by a new policy covering landscaping and the countryside (DM5). The Spatial strategy for locating waste sites remains directed towards the main urban areas.	
Question 47: Climate Change	
Environment Agency	The protection and enhancement of controlled waters via the planning regime is a key consideration. Groundwater is a regional, rather than a local resource and a holistic approach to its protection is more effective at a strategic planning stage. The proactive protection of groundwater resources is key to providing improvements to the aquatic environment and protecting water resources for future use. We would like to see Policy MDC 11: The Water Environment from the 2009 adopted plan included in the review. This has not been included in the Issues Document (November 2013). To support policies MDC11, and MCS8 we provide additional text for justification: Reference could also be made to the Environment Agency's Groundwater Protection, Principles and Practice (GP3). This provides guidance on the Environment Agency's position with respect to conventional oil and gas exploration and underground coal gasification, coal bed methane and shale gas extraction. The policies need to include the assessment and need for water abstraction licences for proposed extensions & particularly new sites for sand and gravel production. The Water Act 2003 removed certain exemptions from the abstraction licensing system. One of these is quarry dewatering. This is due to commence in 2014 and all quarries that dewater will need an abstraction licence. This needs to be incorporated into your plans and policies.
Mountsorrel Parish Council	Restoration of mineral extraction sites and redevelopment as open space or farmland is important. Mountsorrel Parish includes a major quarry site that has been a waste tip and is now being restored to heathland in conjunction with English Nature. The Mineral Company has created 2 new footpaths and public access to the heath on Broad Hill will be

	allowed when subsidence finishes. These are good examples of restoration. These existing policies need to be continued. Climate change will be mitigated by increased recycling and reuse of C&D waste will reduce demand for new aggregates. Shallow Sand and Gravel extraction sites can be flooded to help to balance water flow in the main river valleys.
Natural England	We would suggest that the link between green infrastructure and climate adaption is strengthened. The provision of new areas of green infrastructure through the reclamation of minerals sites can help to strengthened resilience to the effects of climate change by providing stronger ecological links; prevent habitat fragmentation and loss of species and habitat types. This approach would comply with the guidance set out at paragraph 99 of the NPPF.
Leicestershire Quarries Vision Project	Probably not. There is some loss of public amenity when, say, Watermead Park is flooded. However, the water has to go somewhere, and a couple of elevated walkways would solve the through-route problem.
New Earth Solutions	New Earth consider that the existing Core Strategy Policies do need to be re-visited in order to meet the challenge of climate change, primarily Policies WCS2 and WCS3 as they are likely to lead to a shortfall in recovery capacity. This in turn will result in continued reliance upon landfill and the emission of methane which is 22 times a more harmful a greenhouse gas than CO2.
Biffa Waste Services Ltd	We consider no amendments are necessary.
UK Coal Producers	No.
RSPB	The RSPB is concerned that the existing policies do not meet the challenge of climate change, especially with the proposed deletion of Policy MDC2 (Sustainable Design).
Council's Response (Qu.47) The plan includes a policy on sustainable development which incorporates reference to reducing the effects on climate change. Specific mention is made to green infrastructure projects in the strategic objectives and relevant policies of the plan (in particular DM3).	
Question 48: Protection of residential amenity	
Michael Lambert	A particular issue in looking at q48 in the consultation and para 6.26 is that the Core Strategy solely relates cumulative environmental impact to other waste uses. This is unacceptable in my view. What is required is that the Policy be expanded to include all other external impacts of other uses at the application site or next to it which the proposed use is likely to add to or exacerbate.
Market Bosworth Parish Council	Any increase in activities relating to mineral extraction and waste should only be carried out if the sensitivities of the local community are fully taken in to account. Policies should be adopted which minimise road traffic impact and show a realistic and considerate regard to the local area.
Environment Agency	It is important that policies ensure sufficient buffering between conflicting development types such that they do not disadvantage each other, particularly with regard to amenity issues such as noise, odour and litter/dust (e.g. housing and waste management facilities).

Mountsorrel Parish Council	The existing policies do not need amending but they do need to be enforced from housing development. Housing development in Mountsorrel not far from the Buddon Quarry will not provide the new residents with houses that are compliant with the NPPF guidelines.
Leicestershire Quarries Vision Project	Amendments are probably unnecessary but the reference to tranquillity is going to be difficult to square with future mineral extraction in Charnwood Forest Regional Park.
Sharnford Parish Council	Whilst paying lip-service to the Localism Act, which clearly states that local Communities' views should be given considerable weight when considering proposed development, the County Council has consistently overlooked those views even when officers have openly stated that a recommendation is on "...a knife edge..." balance. Our recommendation is that any new strategy incorporates the idea that any such narrow view should be determined in favour of the Communities since they are the people who have to live with the consequences.
New Earth Solutions	New Earth considers that the existing Policies are sufficient to protect residential amenity and as such, no amendments are necessary.
Biffa Waste Services Ltd	We consider no amendments are necessary.
LCC Green Infrastructure Team	Existing policies relating to the protection of residential amenity do not need amending.
UK Coal Producers	No.
Council's Response (Qu.48): The policy on health and amenity has been merged with flooding and water resources to create one single policy covering the local environment and community protection (DM2). The policy seeks to protect people and local communities from the potential adverse impacts of minerals and waste management development. Safeguarding policies seek to ensure that there is sufficient distance between minerals and waste sites and other forms of development or sensitive land uses (for example, housing) in order to avoid potential adverse impacts. The policy on cumulative impact has been amended to refer to the effects of a number of developments, not just waste or minerals related.	
Question 49: Separation distances	
National Farmers Union	In paragraph 6.32, agriculture is a land use which may be affected by mineral and waste operations and its needs should be taken into account when deciding on development nearby. Dust can affect neighbouring crops, land drainage can be affected and noise can disturb livestock.
Coal Authority	The Coal Authority would strongly object to the inclusion within the Local Plan of any separation distance policy or standards. The national planning policy position in England differs from that in Wales and Scotland where buffer zones are used. However national policy in those devolved administrations allows for exemptions which still permit extraction

	<p>even within such buffer zones. They also have complimentary policies that do not allow for non-mineral sensitive developments to be permitted close to existing, permitted or allocated mineral sites in order to protect mineral extraction. This dual approach is necessary in order to allow for a balanced approach.</p> <p>In England the concept was promoted through a Private Members Bill which did not attract Government support and as such has not progressed. The use of any separation distances would be contrary to the NPPF and would lead to the unnecessary sterilisation of significant areas of mineral resources contrary to the NPPF.</p> <p>The issue of the relationship between mineral extraction proposals and local communities needs to be an issue addressed on a case by case approach in the development management process. This is because many factors including the scale and method of extraction, the phasing and the characteristics of the topography and vegetation all differ on a site by site basis.</p>
Mountsorrel Parish Council	Separation distances should be used and guidelines developed based on the type of mineral extraction - deep open pits will need larger distances than surface sand and gravel sites. These guidelines should give a minimum distance and a recommended distance. These guidelines should be based on the expected nuisance from blasting vibration, noise, dust etc. Computer modelling of these variables should provide acceptable limits at varying distances from the extraction site. These computer models should be included in the planning applications for the site.
Leicestershire Quarries Vision Project	Guidelines are usually better than fixed distances. Also, if sand and gravel extraction is being undertaken and the restoration plan is to a site of public amenity close to a centre of population, then short term working close to existing properties may actually be desirable in order to bring the amenity closer to the population.
New Earth Solutions	New Earth agrees with the proposed approach that separation distances be considered on a case by case basis.
Biffa Waste Services Ltd	We agreed with the approach that this should be considered on a case by case basis.
LCC Green Infrastructure Team	Agree that separation distances are best decided on a case by case basis, rather than having a universal distance.
Measham Parish Council	There should be a minimum distance for each type of mineral but with the flexibility to increase/extend according to local area circumstances such as sites of international and national importance.
UK Coal Producers	Agreed that it is best to decide any buffer zones based on the merits of each case.
Carlton Parish Council	We think buffer zones are very desirable and necessary to protect residential amenity from some waste operations. Such zones may also function as nature reserves, informal public open spaces, and visual breaks and screens.
Cemex	Agree.
Mineral Products Association	Separation distances between mineral working and other forms of development should be determined at the application stage once a full environmental assessment has been carried out that specifically details the environmental impact of the proposal. It should not for part of a policy for specified separation distances.

Blaby Parish Council	We would support a minimum separation distance but with the proviso that this could be greater depending on individual circumstances.
Council's Response (Qu.49): It is not considered appropriate to specify separation distances in relation to mineral and waste management operations. Reference is however made to them in the policy on Local Environment and Community Protection (DM2) which states that they will be applied where appropriate, neither specifying what the distance would be nor prescribing in what circumstance they would be appropriate.	
Question 50: Natural and built environment	
Mountsorrel Parish Council	Existing policies are adequate but the wording needs to be brought up to date.
Natural England	Whilst Natural England considers that the existing policies on the environmental protection (MCS11 and WCS10) generally cover our interests in the natural environment we suggest these policies should be strengthened in the following ways: <ul style="list-style-type: none"> - It should be established that minerals and waste development should seek to achieve net gains for nature to reflect the advice set out in paragraphs 9 and 109 of the NPPF. - The policy should also promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets. - We would emphasise the value of Local Wildlife Sites. - The policy on the natural environment should also identify mitigation measures and / or requirement for compensation (where necessary) to avoid, reduce and manage potentially adverse impacts. - We suggest that you could make reference to the National Character Areas (NCAs) - We would like to see reference made to the concept of Ecosystems Services to comply with the advice set out at paragraph 109 of the NPPF. - We would also suggest that reference is made to "Nature after Minerals" which is a partnership between Natural England and RSPB.
Leicestershire Quarries Vision Project	Almost certainly they need revising to incorporate the principles of sustainability, although it is likely that all already comply.
New Earth Solutions	New Earth is comfortable with the existing approach to the protection and enhancement of the natural and built environment.
Biffa Waste Services Ltd	We consider no amendments are necessary.
LCC Green Infrastructure Team	MDC4/WDC3 need to clarify 'special landscape areas and landscape features of importance' in the light of NPPF. MDC5/WDC5 and MDC6/WDC6 could be merged and strengthened with a new focus on landscape character. The term 'landscaping' should be avoided. MCS13/WCS12 – suggest that 'ecology' could be reworded to 'biodiversity and geodiversity' given the geological

	importance of Charnwood Forest. When LCC becomes the SUDS approval authority, will the MWLP need to reflect this within this suite of policies, or elsewhere?
National Forest Company	The NFC supports the retention of Policies MDC6 and WDC7: Landscaping and Woodland and requests that they should be amended to specifically reference the need to incorporate woodland creation as part of proposals within The National Forest.
UK Coal Producers	No.
Leicestershire & Rutland Wildlife Trust	No.
Cemex	Ensure in accordance with current legislation and guidance.
RSPB	The RSPB supports the aspiration of Policy MCS11. The minerals industry is uniquely placed to help halt and reverse the country's massive - and ongoing - decline in biodiversity. In order to maximise this potential, the Plan should include a policy that promotes a biodiversity-led approach to mineral site restoration. In the context of Policy MCS11, the requirement should be to: "Ensure that mineral development deliver a net-gain in biodiversity and make a significant contribution to the creation of a coherent and resilient ecological network". The RSPB supports the aspirations of Policy MCS12 (Strategic River Corridors). The policy should promote opportunities for floodplain reconnection, channel re-braiding and managed retreat of flood defences through mineral site restoration. The policy should also require mineral development to provide a net-gain in biodiversity and contribute to the creation of a coherent and resilient ecological network along the river corridors, primarily through the landscape-scale creation of wetland habitat.
English Heritage	We consider that the existing policies relating to the historic environment require amendment in order to achieve sustainable development and to accord with the requirements of the NPPF for the historic environment. Existing Core Strategy Policies MCS11 and WCS10 sets out a strategy in general terms for environmental protection, including the historic environment. However, we consider this to be overly broad in nature, and fails to set out in any detail a strategy for how the conservation and enhancement of the historic environment will be achieved, in relation to minerals and waste development. Rather, these policies simply cite the need to ensure that there are no unacceptable impacts to the historic environment. This requirement is already set out in the NPPF, therefore details of how this will be achieved is required within a policy, at local level. We consider that a strategic policy should play a positive role in ensuring the conservation, management and enhancement of the historic environment through the Minerals and Waste Local Plan. This could include references to building stone, tackling heritage at risk (tied in to other policies as per our comments above which are positive in this respect), as well as ensuring appropriate restoration. Existing development management Policies MDC3, MDC4, WDC2 and WDC3 also require substantial amendment work

	<p>in order to reflect the NPPF. For example, with regard to the historic environment, post PPG15 and 16, is the concept and consideration of 'significance' of heritage assets, provisions in relation to substantial harm and less than substantial harm, and the recognition of non-designated heritage assets. In addition, it should be noted that conservation areas are defined as 'designated heritage assets' and although are designated locally, are recognised within the NPPF as being nationally important.</p> <p>To address this, in line with the NPPF, we would wish to see a dedicated DM policy for the historic environment. This should not simply repeat the provisions made within the NPPF, however, it should set out a clear policy for the historic environment to setting out what will or will not be permitted and guide how the presumption in favour of sustainable development can be applied locally.</p> <p>Areas where you may wish to explore are: areas in which the NPPF is silent (for example non-designated archaeology); areas where NPPF policies are very generalised - i.e. local information requirements for applications; areas where development management policies are necessary to address local circumstances - i.e. development affecting historic landscape characteristics.</p> <p>We would suggest that revised wording of a historic environment policy should consider the following: include requirements to conserve and enhance heritage assets; provide detailed criteria for all types of heritage asset; set out information requirements for applicants; make reference for the need to avoid adverse impacts, and mitigate, where relevant.</p> <p>We also advise that the historic environment is not consigned to stand alone policy - there may be other relevant policies where a specific criteria relating to the historic environment is appropriate for example in policies associated with specific site allocations and policies relating to landscapes and design etc.</p>
--	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Council's Response (Qu.50)

The plan includes a new policy in respect of biodiversity/geodiversity which covers international, national and local sites of biodiversity/geodiversity interest

Existing policies MDC5/WDC5 and MDC6/WDC6 have been merged.

The Policy related to strategic green infrastructure (DM3) promotes woodland creation within the National Forest and biodiversity enhancement of strategic river corridors.

The plan includes a new policy on the historic environment to replace the existing policies in order to accord with the requirements of the NPPF.

Question 51: Sites of International and National Importance

Mountsorrel Parish Council	The new Local Plan should include policies for these sites.
Natural England	Natural England agrees that the Minerals and Waste Plan should include policies regarding sites of international and national importance to better reflect the advice contained in the NPPF. The policy should distinguish between international, national and local sites. It should also set out that any proposal that adversely affects a European site, or causes significant harm to a SSSI will not normally be granted permission. A Habitats Regulations Assessment would

	need to be carried out to assess the impact on the River Mease SAC and we note that this requirement has been recognised in the Sustainability Assessment.
Leicestershire Quarries Vision Project	Yes. Since restoration is the key to making mineral extraction sites sustainable, some guidance on how to handle sites of national importance should be included. The geology of Charnwood Forest is particularly important and keeping special exposures accessible whilst still restoring a site is an important consideration. For example, it would be unthinkable, one hopes, to “restore” a quarry with an exposure of Charnia fossils by landfill.
New Earth Solutions	New Earth is comfortable with the proposed approach.
Biffa Waste Services Ltd	We agree with this approach. A higher level of control should be applied to sites of international and national importance than those of local importance.
LCC Green Infrastructure Team	Yes, agree that the Plan should include policies regarding sites of international and national importance.
Measham Parish Council	Yes - Agree that policies should be included.
UK Coal Producers	Yes.
Leicestershire & Rutland Wildlife Trust	Yes.
RSPB	The RSPB agrees ‘that the Minerals and Waste Plan should include policies regarding sites of international and national importance’. Clear policies, with appropriate wording, should help to ensure that these sites receive the level of protection that their national / international status requires.
Council’s Response (Qu.51): The Plan includes a policy covering sites of international and national importance for biodiversity/geodiversity (DM7).	
Question 52: Transportation of Minerals and Waste	
Market Bosworth Parish Council	Policies should be adopted which minimise road traffic impact and show a realistic and considerate regard to the local area.
Lutterworth Town Council	Lutterworth Town Council is keen to see an agreement drawn up between Leicestershire County Council and Harborough District Council to remove any associated materials along prevalent routes that have fallen in transit due to insecure loading i.e. A426, A5, A4303.
Mountsorrel Parish Council	Much of the production of Mountsorrel Quarry travels by rail and this is environmentally preferred to large numbers of lorry movements. However the capacity of the railhead is limited and could be improved. There is a dedicated road link to the A6 bypass which removes lorry movements through the village but the noise and sometimes spilled material

	creates problems. The road link also services a waste transfer site. This example of good practice should be followed at all hard rock aggregate sites.
Leicestershire Quarries Vision Project	If minerals are a high-bulk low-value product, then waste is even worse. Although no specific mention has been made of the structure of the domestic waste industry it seems to be emerging that separating waste into different streams, such as different grades of plastic, is much better done by trained operatives than by the public. Sites to do this need to be large enough to generate sufficient volume but also close to the source of the arisings. It is hard for a policy to specify strategic locations for the sorting stations as this involves commercial decisions. Sorted material goes for recycling and the residue to landfill or incineration. The ever-increasing fuel cost means that there is a strong economic incentive to reduce vehicle miles and a strategic plan needs to recognise this by not being too over-specific. Not all exhausted mineral workings will be suitable for landfill, and according with the principles of sustainability, they have to fill some other future "need". Gravel workings are relatively easy to turn into havens for wildlife and public amenity. Hard rock quarries can have uses - the National Diving Centre is one - and by being in the centre of England, distant from coasts - it reduces the road miles of visitors. An alternative to diving is adventure parks providing for climbing and other outdoor recreations such as mountain biking, zipwires and exposed cabled footpaths. Again, because of the proximity to London, Leicestershire being closer than Derbyshire, there is the opportunity for reducing the road miles for visitors to such facilities.
Philip Sullivan	It should be policy that waste must be taken to the nearest site available.
Frolesworth Parish Meeting	Existing policies should clearly set out the need for transportation of waste to a minimum and wherever possible adjacent to existing waste facilities in accordance with the Minerals and Waste Core Strategies.
Highways Agency	The HA notes that 36% of igneous rock extracted from quarries in Leicestershire was transported by rail in 2009. However, the HA understands that the four rail connected igneous quarries in Leicestershire are likely to face a shortfall in the medium to long term necessitating a need to extract from the currently inactive quarries which are not rail connected. This is likely to increase the number of HGV trips on the SRN and this will require to be considered further. The HA accepts that road haulage is likely to remain the predominant mode of transport for minerals and waste transportation in Leicestershire, especially given the decline of the four rail-connected quarries. With this said, the HA considers that transport impacts of all waste and minerals related planning applications will need to be considered and where significant, applications will need to be supported by an appropriate Transport Assessment (TA) and a site transport plan. This will ensure that transport issues, including SRN impacts are considered at an appropriate time.
LCC Highways	From a strategic policy perspective, the policies relating to the transportation of minerals and waste still appear to be generally OK. However, do Network Rail's proposals to enhance freight capacity on routes in and around Leicester open up any opportunities to carry more by minerals by rail?
Charnwood Borough Council	We support the rationale for locating waste facilities close to arisings so as to reduce transport movements but recognise that the location of facilities will need to be sensitively designed to reduce environmental impacts upon existing and new residential areas. The proposal includes reference to strategic sites being in and around the urban

	areas of Shepshed and Loughborough as well as Leicester; and the non-strategic sites includes sustainable urban extensions.
New Earth Solutions	New Earth believe that the existing Policies must take account or at least recognise the established network of bulking / waste transfer stations in operation across the County which enable a localised point of delivery.
Biffa Waste Services Ltd	We consider no amendments are necessary.
UK Coal Producers	Fine.
Council's Response (Qu.52): Existing policies on transportation have been merged into one policy (DM9) which seeks to minimise the effects of traffic generated by minerals and waste developments.	
Question 53: Public Rights of Way	
Leicestershire Local Access Forum	<p>There are opportunities to make improvements to the footpath network within and through quarries and other redundant workings. This has obvious benefits both by way of carbon footprints and the health and general wellbeing of the populous. In some places over-the-wall bridleways alongside roads adjacent to mineral workings could give an opportunity to allow horse riding off-road which given the increasing motorised usage of rural roads must be encouraged. These are of great value to cyclists and walkers as well.</p> <p>A strong case can be made for the principle that at the very least, locations involving the movement of heavy goods vehicles and buses should aim to provide off-highway routes (bridle and footpaths) in their immediate vicinity so as to protect vulnerable road users from the traffic hazards. The existing policies probably need to be amended to stress the importance of improving the coherence of the footpath and bridleway network and its interrelationship with centres of population and places of interest.</p> <p>There should also be opportunities within such restoration sites for more involved leisure activities. Circular routes with tarmac paths suitable for people with disabilities should be added linking into the wider network where possible. More sporting interests should also be accommodated where possible i.e. climbing, cycling and mountain bike trails, BMX etc. This would encourage younger people to become more active.</p>
Ramblers Association	It is essential that the integrity of the Rights of Way Network is maintained during the working life of the extraction sites, by appropriate temporary diversions avoiding busy roads, particularly if they will carry additional traffic generated by the extraction process. User Groups should be fully consulted over such routes. Note also needs to be taken of current informal access for recreational purposes
Ramblers Association	Once extraction activity has ceased, with increasing pressure on the countryside, it is essential that opportunities for access are maximised, by restoring and enhancing the rights of way network to improve connectivity, and, where appropriate, allowing wider spatial access.
Ramblers Association	Any development must take into account the possibility that as yet unclaimed Lost Ways may be affected, therefore research into such routes must be included during the planning application process.

British Mountaineering Council	Access to the natural environment should be encouraged for informal recreation as an important element within the green infrastructure network. The BMC trusts that the stated aim in the existing policy to ensure - that opportunities are taken to secure improved access to the countryside – will be actively pursued. The new routes provided on restored land by Lafarge Tarmac in Mountsorrel are good examples.
Mountsorrel Parish Council	Mountsorrel has seen two permissive paths added to the local network, one of which meets the Leicestershire Round LDP and provide limited access to Broad Hill the site of the infilled Great Quarry, and the other goes through natural woodland and replanted woodland parallel to Wood Lane. These are good examples by Lafarge Tarmac of increased access to restored countryside.
Natural England	Natural England would welcome initiatives to enhance and extend the Public Rights of Way network as it makes an important contribution to informal recreational provision and can also contribute to the green infrastructure network.
Leicestershire Quarries Vision Project	Bridleways and footpaths provide an important recreational facility for the general public good. There will be a "need" for such amenities in the future and so "sustainability" requires that such amenities be improved by any present developments. The existing policies probably need to be amended to include this concept and stress the need for improvements to the network and increase in its total length.
New Earth Solutions	New Earth is comfortable with the Policies on rights of way.
Biffa Waste Services Ltd	We consider no amendments are necessary.
UK Coal Producers	Fine.
Council's Response (Qu.53): The policies on public rights of way (which seeks to protect them and improve access) have effectively not been changed.	
Question 54: Other Development Management Policies	
Mountsorrel Parish Council	The detailed policies in respect of information requirements, planning conditions and obligations should be retained. This will prevent slipshod and incomplete applications from being passed because of the need to speed up the process. Developers will be encouraged to cut-corners in the hope that the public and other objectors do not notice and will give local planners less guidance.
Leicestershire Quarries Vision Project	Irrespective of the complexity of whether everything is covered elsewhere, surely the basic driver of current Government policy is that applications should be made easier and not bogged down in bureaucracy. With this principle in mind, it might be better for the user if there is a check list for the applicant rather than each applicant having to make themselves aware of factors dispersed in a lengthy document.
LCC Highways	The upfront clarity of the existing policies would seem to be helpful and useful both for promoters and those considering proposals.
Charnwood Borough Council	Policy MDC17, MDC18, MDC19 and MDC20, WDC14, WDC17 and WDC18 are all very detailed policies which do not fit well into a strategic document.

New Earth Solutions	New Earth agrees that Policies WDC4, WDC17 and WDC18 should be removed.
Biffa Waste Services Ltd	We agree that that the policies should be removed.
LCC Green Infrastructure Team	The policies in respect of information requirements, planning conditions and planning obligations could be removed, provided that the information checklists contained within the existing policies are covered in the supporting text of the Plan.
UK Coal Producers	Agree.
English Heritage	We do not object to these policies being removed, however in terms of the historic environment, we consider that policies for this should make reference to the information requirements for applicants with regard to the significance of heritage assets, and the appropriate curation of findings.
Council's Response (Qu.54): The policies in respect of information requirements, planning conditions and planning obligations have been removed.	
Question 55: Reclamation and Aftercare	
Forestry Commission	The FC is a statutory consultee for local or minerals planning authorities' aftercare conditions imposed for the purpose of aftercare. This requirement relates largely to the management and re-instatement of soil and soil forming materials. Forest Research has carried out a significant body of research and provides technical advice in relation to the restoration of land to woodland and forestry purposes. This is readily available on the web 'Land Regeneration and Urban Greening' and 'Best Practice Guidance notes', and is relevant to all woodland/forestry land restoration projects.
Northamptonshire County Council	Yes in relation to temporary waste development being included under restoration policies.
Rutland County Council	Yes in relation to temporary waste development being included under restoration policies.
Coal Authority	It is considered imperative that high quality restoration and aftercare is secured in order to bring land back into beneficial re-use without raising any public safety liability on future generations.
British Mountaineering Council	The NPPF states that local planning authorities should provide for restoration and aftercare at the earliest opportunity to be carried out to high environmental standards, through the application of appropriate conditions. Also, Paragraph 5.61 of the Minerals Core Strategy indicates that mineral workings should be subject to progressive extraction and restoration, where practicable, in order to facilitate restoration of land at the earliest opportunity. While it is noted that progressive restoration is particularly applicable to sand and gravel, brick clay and opencast coal operations, the policy should be strengthened to promote progressive restoration in hard rock quarries. Where possible, operations should be improved to avoid large worked out areas being left unrestored until the wider operation closes down.

Mountsorrel Parish Council	We agree that the policy WDC15 should be amended as suggested in paragraph 7.5.
Natural England	Natural England agrees that the policy should be amended to reflect paragraph 7.5 to ensure that small waste sites have appropriate aftercare provision.
Leicestershire Quarries Vision Project	A major problem with reclamation and aftercare agreements is that the local authority can choose not to enforce it. After all, what pressure can they exert? At sites where progressive extraction and restoration are being practised, more pressure can be exerted and so progressive extraction and restoration is, in principle, a good thing. The principle should be extended to hard rock quarries - restoration should be concurrent with extraction. This is not always practicable but this is no excuse for indefinite delay. At the very least every minerals site should have an approved restoration plan and show annually how they are implementing it. The excuse that there are still 20 years to run on the extraction permission and so there is no need for even an outline restoration plan should not be tolerated because it violates the principle of sustainability. The policy should be amended to strengthen the requirements for restoration plans, and their absence would mean that the development was no longer sustainable and any future development applications would be refused on these grounds.
Charnwood Borough Council	The intention to strengthen the policy on reclamation and aftercare is supported. It should have regard to the characteristics of the area and the potential of any particular site for range of uses.
Biffa Waste Services Ltd	We agree that WDC15 should be amended as set out. The existing policies do not need amending.
LCC Green Infrastructure Team	Yes, policy WDC15 should be amended as suggested to cover aftercare to all waste proposals. MCS17 makes no provision for agriculture as an after use, although MDC10 recognises that there are situations where this may be appropriate.
National Forest Company	<p>The NFC agrees with the proposed amendment set out in paragraph 7.5 to ensure all temporary waste proposals are subject to the same aftercare expectations.</p> <p>The NFC also considers that existing policies should be strengthened to ensure that screening and restoration landscaping occurs at the earliest opportunity. This would better reflect NPPF paragraph 143 which states that Local Authorities should 'put in place policies to ensure worked land is reclaimed at the earliest opportunity'.</p> <p>Applications should be expected to include details of pre-commencement landscaping and phasing of restoration to demonstrate that opportunities have been taken for early implementation of planting.</p> <p>The NFC considers that for proposals within The National Forest, the current expectation that restored sites are maintained for a period of five years should be extended. Unlike some other after-use proposals, woodland creation requires longer-term management to ensure successful establishment. After the initial five years management, protective guards will need to be removed and rides will need to be maintained to ensure public access. At around 15 years of age the woodland will need to be thinned to benefit the long-term development of the woodland and for biodiversity enhancement.</p> <p>The NFC considers that the emerging aftercare policy should specify that within The National Forest the submission and implementation of a 15 year Establishment and Management Plan will be expected.</p>

Woodhouse Parish Council	<p>The parish council requests that the quarry owners are obliged to include specific plans and funding for restoration of their site. Although it will be decades before the site is abandoned, there are restoration practices that will make it more available to recreational uses once the quarrying has stopped. For example, stabilisation of the benches could be done whilst the quarry is active.</p> <p>The parish council would like funding in place during its commercial life into an endowed trust so that the income from the accrued capital is available permanently to fund recreational use. Funds should also be accrued to support an environmental program to attract and support flora and faunae.</p> <p>A good example of what might be achieved is the work of the Leicestershire & Rutland Wildlife Trust at Stonesby Quarry. This was left unmanaged for a number of years allowing scrub to take hold, but has been restored to create a SSSI site that can be enjoyed by people who lived near to the quarrying activity and by visitors to the county.</p>
UK Coal Producers	Fine.
Leicester-Shire & Rutland Sport	Policy WDC15 should include that high quality aftercare of mineral workings and landfill sites should be a condition of all proposals and make reference to potential recreational uses for allocated sites.
Cemex	Agree.
RSPB	<p>The RSPB agrees that Policy WDC15 should be amended, as suggested in paragraph 7.5. This will help to ensure that suitable aftercare provision is provided for all waste disposal operations, including small, inert waste landfill sites.</p> <p>The RSPB supports the aspirations of Policy MCS17 (Reclamation and Future Use of Mineral Sites), particularly in relation to biodiversity and the creation of new habitats. However, the policy should require all mineral development to provide a net-gain in biodiversity (in line with NPPF paras, 9 and 109). Instead of referring to 'wildlife habitats', the policy should specifically refer to 'priority habitats', as defined in Schedule 41 (Habitats and Species of Principal Importance in England) of the Natural Environment and Rural Communities (NERC) Act 2006. This distinction will help to clarify the type and quality of habitats that should be created through mineral site restoration. The policy should also have regard to the England Biodiversity Strategy and the potential habitat creation and restoration identified by Natural England for each National Character Area.</p> <p>The RSPB supports the aspirations of Policy MDC20. However, the policies should give greater emphasis to biodiversity.</p>
English Heritage	<p>Whilst we are in broad support of priority reclamation approaches in terms of biodiversity, woodland, etc, the restoration and after-use of sites also requires an approach geared towards historic environment considerations. For example, this could entail the restoration and after-use which responds to historic landscape character - in some instances the creation of new wetlands for biodiversity purposes (for example) may be in conflict to this. Specifically, NPPF paragraph 143 (bullet point 8) actively requires policies to ensure that high quality aftercare of minerals sites take place, including for the historic environment. We consider reference to historic environment reclamation should not be excluded here.</p>
Council's Response (Qu.55) Policy and text on restoration and aftercare makes reference to aftercare being applicable to all temporary permissions.	

Policy refers to new gain in biodiversity and gives greater direction to the local habitats that the Council wishes to see created.

Question 56: Afteruse

National Farmers Union	We agree with agriculture and food production being listed as a valid afteruse on page 71 and paragraph 7.8 which states that restoration options are not mutually exclusive.
British Mountaineering Council	Policy MCS 17 in seeking to provide a wider range of after uses compared to the traditional approach of restoring mineral workings to an agricultural use should include land based recreational activities such as rock climbing and mountain biking in the list of options. Through effective restoration planning, worked out quarries can provide functional and diverse components of the County's wider green infrastructure network. Each site should be responsive to its location and no two sites will be the same but the majority of sites will be capable of hosting a range of environmental, recreational, social and economic benefits and restoration plans should set out to maximise these benefits through the provision of complimentary activities.
Mountsorrel Parish Council	Existing policies do not need amending.
Natural England	We do not consider that the policies on afteruse need amending. However we would emphasise that reclamation to non-agricultural uses does not mean that there can be any reduced commitment to high standards in the reclamation. Such reclamations require equal commitment by mineral operators, mineral planning authorities and any other parties involved to achieve high standards of implementation.
Leicestershire Quarries Vision Project	The principle of sustainability requires that the reclamation and afteruse fill some future "need". In most cases a way forward can be envisioned. But what to do with exhausted hard rock quarries? If they had been kept shallow, then some rearrangement of overburden might have sufficed. But most of the Leicestershire ones started as hills and the landform has now been completely inverted so as to be deep pits. There are only three possible options: landfill, fill with water or find a future "need" that the void can be used for. Technically, landfill is possible but is obstructed by the Landfill Tax being too high. As has been previously mentioned this difficulty could be overcome either by a change in primary legislation to enable "restoration landfill" or by the current quarry operators paying the Landfill Tax upfront as part of their restoration responsibilities. Flooding with water involves very large quantities of water (will rivers run dry?) or take such an inordinately long time (100 years +) that it cannot be considered as restoration and would be better described as dereliction - which violates the principle of sustainability. If voids could be left with a future recreational use then this should be classifiable as restoration, which currently it is not. Such uses could include scrambling, climbing, via ferratas (cabled footpaths), zipwires, bridleways, mountain biking, many uses of water, etc. These facilities would be of use locally but in the case of climbing and via ferratas their location, being the closest to London, makes them of regional and national significance. As to other uses, they might best be regarded as upside-down hills, but without the view. For recreational use, the state and steepness of the faces is of critical importance and this is probably the biggest problem that the industry has to face if it wishes to use recreation as the future "need" to

	<p>discharge its sustainability obligations.</p> <p>In case any of the above seems fanciful, there are already several land-filled quarries which provide popular amenities, Stoney Cove is a diving centre, and multiple old quarries are climbed in all over the UK. There are even a couple of small ones in Leicestershire.</p>
Biffa Waste Services Ltd	The existing policies do not need amending.
LCC Green Infrastructure Team	MCS17 should clarify that restoration to agriculture may be an option.
National Forest Company	<p>The NFC considers that updated policies with regards to after-use should specifically refer to the expectation that the development leads to a net gain for biodiversity as set out in the National Planning Policy Framework (NPPF) paragraph 109.</p> <p>The NFC also considers that policies should specify that restoration proposals need to consider existing green infrastructure networks and incorporate habitat creation to enhance and connect these at both a local and regional scale reflecting NPPF paragraph 114. Reference should also be made to the 6Cs Green Infrastructure Study.</p>
UK Coal Producers	Fine.
Leicestershire & Rutland Wildlife Trust	The reference to targets in the LBAP should be removed.
Carlton Parish Council	The character of the local landscape should be the first consideration, together with local needs for recreational spaces. We consider that the restoration of some large sites - for example worked-out gravel pits - might include the creation of new settlements in attractive lakeside settings associated with public access and recreational uses. In some cases there is no need for specific restoration, in that rock faces, spoil heaps and contaminated areas are becoming increasingly rare and may be important habitats in their own right.
Leicester-Shire & Rutland Sport	Where possible after use of mineral workings and landfill sites should include provision for recreation, woodland, open space, water environments and sporting purposes and relevant stakeholders and organisations should be consulted on the proposed after use of such sites. Any after use should be compatible with local and regional recreation, cultural and other relevant strategies.
RSPB	See the RSPB's response to question 55 in relation to Policies MCS17 and MDC20 and question 57 in relation to biodiversity.
Council's Response (Qu.56): The plan does not prohibit restoration to agriculture but all restoration should contribute to a net gain in biodiversity.	
Question 57: Biodiversity	

Northamptonshire County Council	The approach to the reclamation of mineral workings and landfill sites should take into consideration the surrounding environment - not prioritise one outcome over another as this may not be suitable across the county.
Rutland County Council	The approach to the reclamation of mineral workings and landfill sites should take into consideration the surrounding environment - not prioritise one outcome over another as this may not be suitable across the county.
Environment Agency	We agree that the approach to the reclamation of mineral workings and landfill sites should give priority to the promotion of bio-diversity. The policy should be broad promoting enhanced biodiversity while allowing site specific remediation.
British Mountaineering Council	Biodiversity should be a priority in restoration plans. Each site will need careful appraisal but proposals should relate to a County wide strategic plan for increasing biodiversity. In this context the approaches set out in paragraph 7.17 need not be mutually exclusive.
Mountsorrel Parish Council	The promotion of biodiversity should be given priority over restoration to agricultural land. The intensive nature of modern farming results in the loss of natural and seminatural habitats and loss of plant and animal species. Restoration to meet LLRBAP objectives seems the best approach to use, particularly where mining has destroyed original natural habitats such as occurred when Buddon Wood quarry replaced the ancient woodland of SSSI status. Of the options set out in paragraph 7.17 - Option c seems to be the best with a broad strategy for areas and focused on specific biodiversity needs identified in the LLRBAP for a particular site.
Natural England	Yes, Natural England agrees that the approach to the reclamation of mineral workings and landfill sites should give priority to the promotion of biodiversity. Of the approaches set out at paragraph 7.17 we would suggest that they are not mutually exclusive and therefore it may be appropriate to follow a combination of approaches depending on the sites concerned but should be set within the context of a strategic approach planning positively for the creation, protection, enhancement and management of networks of biodiversity. We would also suggest that reference is made to "Nature after Minerals".
Leicestershire Quarries Vision Project	The LLRBAP already exists and makes eminent sense. However, it does not see any biodiversity in a deep flooded pit that takes 100+ years to fill and so the current restoration plans involving natural flooding are not seen as having any biodiversity value. Flooded quarries are isolated and crayfish flourish in the part-flooded quarry at Markfield and so, maybe, they do have some potential. Probably the best approach is a) a broad strategic policy promoting biodiversity through site restoration and d) specifying that specific proposals for the creation on habitats on particular sites should be part of restoration plans.
Biffa Waste Services Ltd	We consider approach (a) that advocates a broad strategic policy promoting biodiversity through site restoration would be the most appropriate. Using this approach biodiversity issues would be required to be addressed at a local level through individual planning applications.
LCC Green Infrastructure	This question and Q58 are linked. Both types of restoration are important, but priority will depend to some extent on site location. Even within the National Forest, woodland planting may not always be the best option.

Team	At para 7.17 the preferred approach is therefore a broad strategic policy promoting biodiversity through site restoration, but with due consideration given to local circumstances.
National Forest Company	The NFC agrees with an approach to reclamation that gives priority to the promotion of bio-diversity. Of the proposed options, the NFC considers option C, a policy of area wide strategies, to be the most appropriate. This should take a spatial approach to suggest appropriate habitats to be incorporated in restoration proposals in specific locations, for example promoting woodland creation within The National Forest.
UK Coal Producers	Fine.
Leicestershire & Rutland Wildlife Trust	Part 1: Yes. Part 2: We would support the idea of a broad strategic policy for the promotion of biodiversity through site restoration, taking into account the characteristics and potential of individual sites. The potential for the creation of particular habitats is greater in some parts of the county than others. The LLRBAP targets are no longer relevant, having been drawn up as part of the now defunct regional planning system. Furthermore, there is now no monitoring mechanism in place to measure success.
Cemex	B) Each site should be assessed individually, Bio diversity should be considered as part of any scheme and form part of the overall afteruse.
RSPB	The RSPB agrees that the approach to the reclamation of mineral workings and landfill sites should give priority to the promotion of biodiversity. The options presented in paragraph 7.17 are not mutually exclusive. In fact, the most appropriate approach would probably be to incorporate elements of all of these options into a biodiversity hierarchy. At the top of this hierarchy, there should be an over-arching strategic policy / objective to promote the biodiversity-led restoration of mineral sites – in line with option (a) - with biodiversity-led restoration being the default requirement for mineral sites. This policy should take a landscape-scale approach to biodiversity delivery such that habitat creation on operational and restored mineral sites makes a significant contribution to the creation of a coherent and resilient ecological network. This would be in line with NPPF, paragraphs 109,114 and 117. All mineral developments should be required to provide a net-gain in biodiversity, even where habitat creation is not the primary restoration objective. Suggested wording for this over-arching policy/objective is provided. Any habitat creation should contribute to delivering the targets of the Leicester, Leicestershire and Rutland Biodiversity Action Plan (LLRBAP) - in line with option (b) - as well as the habitat creation and restoration potential for relevant National Character Areas (NCAs). 'Habitat packing' where small areas of lots of habitats are packed into individual sites, should be avoided. Instead, the emphasis should be on creating larger areas (ideally over 100ha) of a small number of habitats on any one site, as this would significantly enhance the ecological value of the site and potentially reduce long-term management costs. The Plan should develop area-specific biodiversity strategies (for example, the Soar and Wreake Valleys), identifying the most appropriate habitats and biodiversity opportunities in these areas - this would be broadly in line with option (c).

	<p>Provision for long term management is particularly important where the reclamation and aftercare includes the creation of priority habitat. Most priority habitat takes considerably longer than the statutory five year aftercare period to become well established. In these circumstances, it would be appropriate to ensure provision of long term management for a period of 25 years.</p> <p>At the site allocations stage, there should be an over-arching target for the area of priority habitat that will be created on the allocated sites. Specific proposals for the creation of habitats should be developed for each site, in line with option (d).</p>
Blaby Parish Council	We would support para 7.17 (b), a policy based on meeting LLRBAP targets.
<p>Council's Response (Qu.57)</p> <p>It is accepted that the options identified in the Issues Document in respect of promoting biodiversity in site restoration are not mutually exclusive.</p> <p>The plan does not prohibit restoration to agriculture but all restoration should contribute to a net gain in biodiversity.</p> <p>The plan seeks priority habitats in appropriate locations within Leicestershire. It is intended that restoration has a strong local context.</p>	
<p>Question 58: Woodland</p>	
Forestry Commission	We hope that you will consider woodland as a restoration option and the Forestry Commission will be pleased to work with you on relevant restoration projects.
Northamptonshire County Council	The approach to the reclamation of mineral workings and landfill sites should take into consideration the surrounding environment - not prioritise one outcome over another as this may not be suitable across the county.
Rutland County Council	The approach to the reclamation of mineral workings and landfill sites should take into consideration the surrounding environment - not prioritise one outcome over another as this may not be suitable across the county.
Environment Agency	We do not agree that the approach to the reclamation of mineral workings and landfill sites should give priority towards woodland establishment, particularly within the National Forest. Restoration should be site specific and based on local knowledge from ecologists and Wildlife Trust.
British Mountaineering Council	Woodland should be a priority in restoration plans, particularly within the National Forest.
Mountsorrel Parish Council	The National Forest is a long term success story but reclamation of mineral workings and waste sites to woodland should not be prioritised over other areas which are more suitable for restoration to other missing habitats such as upland heathland, water meadows etc. Restoration to agricultural use may only be suitable in a minority of cases.
Natural England	We agree that the approach to the reclamation of mineral workings and landfill sites should give priority towards woodland establishment particularly within the National Forest.
Leicestershire Quarries Vision	Particularly within the National Forest, but not necessarily elsewhere. Sustainability in a restoration plan requires filling some future "need" and it follows that in terms of strategy that, we in the present, should try and maximise the value

Project	of the future need we are filling. Trees may not always give the maximum benefit, especially when they obscure viewpoints.
Biffa Waste Services Ltd	We agree that priority could be given to increasing woodland cover as part of the reclamation of mineral workings and landfill sites. However, it is important to note that the nature of landfill sites is such that planting woodland may not be appropriate in all cases. In particular there is a significant shortage of inert restoration materials in the market and woodland planting requires a greater depth of restoration material to ensure establishment and to prevent adverse impact on the cap. It is often the case that there is simply insufficient material available to secure woodland restoration.
LCC Green Infrastructure Team	This question and Q57 are linked. Both types of restoration are important, but priority will depend to some extent on site location. Even within the National Forest, woodland planting may not always be the best option. The successful long-term maintenance of woodlands is currently a developing issue and this has to be a significant consideration when judging reclamation woodland establishment.
Measham Parish Council	Yes - where enhances the amenity value of the land.
National Forest Company	The NFC strongly agrees with the priority to restore sites to woodland within The National Forest and would welcome the retention of a policy reflecting existing policies MCS14 & WCS11. The emerging policy should refer to further guidance on the creation of woodlands and other habitats within The National Forest being available from the NFC's Guide for Developers and Planners.
UK Coal Producers	Fine.
Leicestershire & Rutland Wildlife Trust	No, such an approach may result in the biodiversity potential of particular sites not be maximized, for example if a mineral site already had substantial value for open habitats such as grassland. Restoration to woodland should be considered within the framework of an overall strategy, but taking into account the characteristics and potential of an individual site.
Carlton Parish Council	Within the National Forest woodland creation is a priority, but other amenity and environmental uses may be more appropriate in specific sites. There is an identified need for a wheels park in the National Forest area, and this could be accommodated in a worked-out quarry with minimal impact on the surrounding area.
RSPB	The RSPB supports the improved management of woodlands and increasing the total woodland cover in the County, particularly in the National Forest. However, this increase in woodland cover should not be at the expense of increasing the area of other priority habitat. For example, in river valleys it may be more appropriate to create non-woodland, wetland habitat (e.g. wet grassland).
Blaby Parish Council	Agree.
Council's Response (Qu.58)	
The plan continues to give priority to woodland planting in the National Forest but does not prohibit this being part of a scheme with a	

mosaic of habitats.

Question 59: Agriculture

National Farmers Union	Sites could be restored to agriculture even when BMV land is not affected. It should depend on the wishes of the landowner and farming tenant. After all, there can be several uses for a piece of reclaimed land, not just one.
Northamptonshire County Council	The approach to the reclamation of mineral workings and landfill sites should take into consideration the surrounding environment - not prioritise one outcome over another as this may not be suitable across the county.
Rutland County Council	The approach to the reclamation of mineral workings and landfill sites should take into consideration the surrounding environment - not prioritise one outcome over another as this may not be suitable across the county.
Environment Agency	We do not agree that the approach to the reclamation of mineral workings and landfill sites should give priority to the protection of valuable soil resources. Biodiversity gains should be a priority to compensate for the disturbance and damaged caused by the activity. We do not agree that sites should only be restored to agriculture where they affect significant quantities of best and most versatile agricultural land. Although this would create a compromise to allow some agricultural land to be reinstated however the quantity should be consulted on by relevant ecological and wildlife bodies.
Mountsorrel Parish Council	Restoration to agriculture is probably only worthwhile in the minority of cases where it can be restored to the status of the best and most versatile agricultural land. Other uses which can be combined, to provide species-rich grassland for grazing for example, may be a better use thereby increasing biodiversity and agriculture.
Natural England	Natural England agrees that there should be protection of valuable soil resources. The Plan policies should take account of the impact on land and soil resources and the wide range of vital functions (ecosystem services) they provide in line with paragraph 17 of the NPPF. We also agree that it is essential to safeguard the long term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future. In line with the Technical Guidance to the National Planning Policy Framework we advise that a soil and ALC assessment should be carried out as part of the site selection process.
Leicestershire Quarries Vision Project	This section contains the first discussion of the difficulties of finding fill material for voids, a problem that has been referred to above (Q56). Whilst it is technically feasible to restore to agriculture, this will usually not give the greatest value of future need. Specific answers are No and a weak Yes.
Biffa Waste Services Ltd	We agree. See our response to question 58 above.
LCC Green Infrastructure Team	Yes, priority should be given to the protection of valuable soil resources. There is perhaps a need to retain some flexibility in respect of sites suitable for restoration to agriculture as the situation may change over the lifetime of the Plan.

UK Coal Producers	Fine.
Leicestershire & Rutland Wildlife Trust	Part 1: No, not if the biodiversity value is exceptionally high. Part 2: Yes.
Carlton Parish Council	The best and most versatile agricultural land must be conserved and restored as an increasingly important national resource.
Cemex	Agree.
RSPB	Whilst the RSPB supports the protection of valuable soil resources, this should not mean that sites have to be restored to agriculture where they affect significant quantities of best and most versatile agricultural land. In order to ensure the delivery of national and local biodiversity targets, a more flexible approach is required. The RSPB encourages an approach in relation to BMV agricultural land of focussing on the long-term potential of the soils, rather than the immediate after-use of a particular block of land. This approach could also potentially allow for moving BMV soils off-site to be used on lower quality agricultural land, for example, where mineral extraction is below the water table and wetland habitat would be the most appropriate restoration option.
Council's Response (Qu. 59): Policy on soils seeks to protect best quality agricultural land but does not preclude restoration of such land for other uses.	
Question 60: Leisure and recreation	
Northamptonshire County Council	The approach to the reclamation of mineral workings and landfill sites should take into consideration the surrounding environment - not prioritise one outcome over another as this may not be suitable across the county.
Rutland County Council	The approach to the reclamation of mineral workings and landfill sites should take into consideration the surrounding environment - not prioritise one outcome over another as this may not be suitable across the county.
British Mountaineering Council	The BMC believes that there is a significant opportunity in Leicestershire to turn worked out quarry sites into valued resources for recreation and nature conservation. Due to the large scale nature of hard rock quarrying in Leicestershire and the county's relative position in relation to population centres and availability of exposed rock faces across the country, there exists a unique opportunity for the county to benefit from new recreational attractions for local residents and visitors alike. There are good examples elsewhere in the country where sports such as rock climbing and mountain biking have provided a positive after use for worked out quarries in conjunction with habitat creation and nature conservation. The BMC is currently completing work that sets out the methods of delivery from planning and feasibility to solutions to perceived barriers such as optimal blasting for final rock faces and legal liabilities. It is accepted that the development of rock climbing will only be possible on certain suitable sites, but the BMC is looking to the County Council to take the opportunity to put in place the requisite planning requirements and guidelines

	that will enable positive restoration schemes to materialise.
Mountsorrel Parish Council	<p>Leicestershire lacks major cliffs and rock outcrops for recreational climbing. The steep outcrops and benches may provide a range of climbs if suitably scaled and stabilized. Within the Midlands there is a shortage of climbing areas until you reach Derbyshire where the Peak District is a major tourist and recreation centre. This after-use for the large hard rock quarries has been suggested before to the County Council but has not implemented.</p> <p>Tourism in the National Forest is increasing but leisure sites for caravans and tents are scarce. In many tourism areas caravan sites are hidden from view in former quarries, partially restored and screened by woodland.</p> <p>One of the flooded hard rock quarries at Stoney Stanton is used as a scuba diving centre and other sites could be used for similar recreational use.</p>
Natural England	<p>Natural England has no specific suggestions where reclaimed minerals workings or landfill sites should give rise to leisure and recreation after uses. We would emphasise however the need to avoid recreational disturbance in areas which are sensitive for their nature conservation interest.</p> <p>We have no evidence of the need for major new recreational facilities in the County that are likely to rely on mineral extraction to be realised.</p>
Leicestershire Quarries Vision Project	<p>The areas where recreational and leisure facilities are best provided is near to population centres. Exhausted sand and gravel are the best candidates. Watermead Park is a prime example, although in any future planning the operators should carry the financial burden of restoration and possibly provide an endowment to cover future running costs. Endowments to cover the running costs of restoration sites which are to be transferred to public ownership as public amenity should also be made part of restoration plans. So the lessons from Watermead Park are that high quality restoration of gravel workings close to centres of population can well fill a future recreational need (as required by sustainability).</p> <p>Because the Leicestershire has the nearest hard rock to London, it follows that recreational facilities in Leicestershire requiring hard rock could provide an important national resource and attract visitors. This idea was discussed at the Leicestershire Quarries Vision Forum held in County Hall in 2011.</p> <p>One problem is that the area of rock in an exhausted superquarry might be too large for any possible climbing/via ferrata/zipwire facilities and that only the upper benches might be required. The biggest technical problem is that current blasting techniques shatter the rock too much and a gentler technique would be required for the final cut. On the other hand, if only the top benches are required then their restoration could be carried out as each bench is completed i.e. concurrently with extraction (see Q3 & 55). An additional benefit for the industry is that they might be permitted to leave steeper faces (on average) and so increase reserves and extract more rock from each site. It is surprising that the Mineral Products Association offers no opinion on these matters.</p>
National Forest Charitable Trust	<p>Given the Heart of the Forest Vision and Action Plan and its recognition by NWLDC it is suggested that the reclamation and restoration of the New Albion site and the Donington Island site should give priority to facilitate leisure and recreation after uses.</p>

National Forest Company	While the NFC has no specific evidence of need for major new recreational facilities, it is considered that leisure and recreation uses, if accommodated within a suitable woodland setting, would be acceptable reclamation proposals within The National Forest.
Woodhouse Parish Council	Other places e.g. the Peak and Lake Districts, are earning money through leisure pursuits with disused quarries. Activities include climbing, scuba diving, mountain biking, walking, zip wires and wildlife - even housing is possible.
UK Coal Producers	Fine.
Leicester-Shire & Rutland Sport	<p>The leisure and recreation use of reclaimed minerals and landfill sites should support a robust evidence base for the need and location of such uses. The aftercare proposals for such sites should include the resource support for developing the needs based strategy, for recreation and sporting use with relevant stakeholder and organisations. Leicester-Shire and Rutland Sport recognises that there are important opportunities for this Minerals and Waste Local Plan to contribute to sustainable environments that promote physical activity and coexist in a complementary manner with other relevant strategies that support health and wellbeing.</p> <p>Wherever possible consideration should be given to ensuring effective engagement with public and private stakeholders. This would help ensure that the reclamation of minerals and landfill sites are examined for recreational uses.</p> <p>Leicester-Shire and Rutland Sport would welcome the opportunity to engage further in this process and establish links with wider bodies and organisations to ensure a joined up strategy for the future use of existing and proposed new sites.</p>
Council's Response (Qu.60) Policy on afteruse seeks greater public access on restored sites. It also seeks innovative restoration of hard rock quarries in Charnwood Forest, including recreational pursuits. The plan promotes the creation of new leisure and tourism facilities within the National Forest.	
Question 61: Reclamation of rock quarries	
British Mountaineering Council	<p>We recognise the opportunity for this plan to promote the creation of recreational assets in Leicestershire that would be of national importance.</p> <p>Like no other county in England, hard rock quarrying in Leicestershire is providing a legacy of worked out quarry sites on an unprecedented scale. Whilst creating a range of problems for residents, these features can also be positive assets for the future. Through sustainable and innovative restoration planning that promotes recreation and nature conservation, these sites would make a significant contribution to social, economic and environmental prosperity of the County. There are clear links to wider policies and targets for health and well being, sport, green infrastructure, biodiversity and the Regional Park.</p> <p>There is a major opportunity to join together minerals planning and wider planning goals. The BMC is keen to liaise with partner organisations and stakeholders to contribute to the proposed long term strategy for the restoration and re-use of hard-rock quarries.</p>

	<p>The BMC agrees that a long term strategy for the reclamation of rock quarries within Charnwood Forest is required. The vision statement of the Regional Park states that minerals sites should be restored to biodiversity, geodiversity, sustainable leisure and tourism, and woodland uses. To achieve this, where sites become valued assets within the Park combining recreation with biodiversity and geodiversity, it will require progressive partnership working within an agreed strategy.</p> <p>Regarding the question of specific proposals, it will be possible to establish aspirations and goals within the strategy. Delivery will depend on all stakeholders working together including the quarry companies, so planning requirements set out as part of the new minerals local plan and the more specific Charnwood Forest strategy will be crucial. The BMC would like to contribute where appropriate to the formation of the strategy.</p>
Mountsorrel Parish Council	<p>There should be a long term strategy for the reclamation of the rock quarries within Charnwood Forest and a range of leisure uses has been suggested. It is difficult to include this in a Mineral Plan but it should be part of the role of the Charnwood Forest Regional Park authority with representation from the County Council and the relevant Borough Councils. It is difficult to restore deep hard rock quarries but a range of leisure, recreation and wildlife uses can be devised for these deep voids. It will just need a lot of imagination and long term planning to produce an 'Eden project' or something similar for the East Midlands.</p>
Leicestershire Quarries Vision Project	<p>The section leading up to this question well highlights the many factors involved in allowing large scale mineral extraction which can leave large pits to be described, even loosely, as sustainable. True, sustainability is a recent concept, but the record of the industry clearing up after itself is not good and historically it was common to lock the gates and walk away. There should be a long-term strategy for the reclamation of hard rock quarries in Leicestershire and it should be particularly well thought through for Charnwood Forest which is one of the most intensively quarried areas in the UK, if not the world. Sustainability demands it. As a start all hard rock quarries should have a restoration plan. If they do not, then the default should be "concurrent restoration to amenity". Again, all of these matters were discussed at the Vision Forum mentioned above. The involvement of the industry is critical because it is important not to impose any insuperable burden - after all, we all benefit from cheap aggregate - and any outcome must be robust and practicable. Perhaps "sustainability" is the key. Because this is such an important issue, worth billions of pounds, perhaps a new Forum should be held with the industry invited to show how it believed that the industry could make its operations in Leicestershire "sustainable". The previous Forum did suggest a practical restoration of a small quarry just to prove that the industry could actually restore to amenity, but so far nothing has come of it.</p>
Bowline Climbing Club	<p>In summary, we suggest that, rather than a liability to their owners, abandoned hard rock quarry voids should be considered as recreational assets to the community, especially in Leicestershire where, because of their location, they have the potential to be transformed into facilities of national importance.</p> <p>We strongly support a long term restoration strategy being drawn up for all Leicestershire quarries that includes options and actions to reuse hard rock quarry voids as recreational assets. This should include as wide a range of restoration options as possible because the area of rock potentially available will vastly exceed anything that local climbers can use.</p> <p>Although the our concern is primarily to use the almost unique opportunity that Leicestershire has to create a resource</p>

	<p>for rock climbing, we are also aware of other synergistic recreational possibilities that include mountain biking, so-called via ferrata, zip wires, and of course in flooded voids canoeing/diving.</p> <p>These possibilities were discussed with both the Planning Department and the industry at the Leicestershire Quarries Vision Forum held in 2011. We are surprised that so little use has been made of the conclusions of this forum.</p>
Charnwood Borough Council	We would support reference to the reclamation of rock quarries and note recent interest shown for their potential for rock climbing at some locations.
LCC Green Infrastructure Team	<p>Yes, although this could only be a broad strategy because things may change over the Plan period and, more particularly, over the very long timescale for working and restoring these quarries.</p> <p>The new plan should not include specific proposals for quarries but should retain flexibility.</p>
Lafarge Tarmac	<p>We are supportive of the intentions of establishing a long term strategy for the reclamation of hard rock quarries within Charnwood Forest. The difficulty lies in that each quarry has its own individual circumstances therefore it is possible to have commonality in overall aims rather than having a specific policy led reclamation strategy.</p> <p>Lafarge Tarmac are involved in the Charnwood Regional Park Steering and Stakeholder groups that seeks to provide an overall vision and approach to restoring mineral sites within Charnwood Forest.</p>
UK Coal Producers	Fine.
North West Leicestershire District Council	A long term strategy for the reclamation of rock quarries in the Charnwood Forest would be welcome as helping to provide greater certainty. It would appear that it is not the intention that there would no further extraction of hard rock from the Charnwood Forest area. If this is the case then this needs to be made clear for the avoidance of doubt. In addition, it should be made clear that the consideration of any proposals would have to take account of other policies, including those relating specifically to the Charnwood Forest.
Leicestershire & Rutland Wildlife Trust	<p>Part 1: Yes</p> <p>Part 2: Yes.</p>
Leicester-Shire & Rutland Sport	A long term strategy for the reclamation of rock quarries within Charnwood Forest should be developed and include specific proposals for reclamation of rock quarries in Leicestershire that would be favourable to recreational uses such rock climbing and outdoor pursuits.
RSPB	<p>The RSPB supports the proposal for a long term strategy for the reclamation of rock quarries within Charnwood Forest and for the Plan to include specific proposals for the reclamation of rock quarries.</p> <p>Any such strategy or proposals should focus on biodiversity-led restoration, with a particular emphasis on the biodiversity objectives for Charnwood Forest Living Landscape.</p>
<p>Council's Response (Qu.61)</p> <p>The plan seeks innovative restoration of hard rock quarries in Charnwood Forest, which would provide for biodiversity, public access, educational activities and recreational pursuits.</p>	
<p>Tables</p>	

Derbyshire County Council	It would be more helpful if Table 5.6 were to show all the local planning authorities that export waste to a particular site where the average is above 5,000 tonnes. For example, Wanlip Sewage Treatment Works and Cotesbach receive tonnage from Derbyshire which averages above 5,000 tonnes.
Council's Response: This is addressed in the Appendix to the Waste Needs Assessment.	
Air Products	Air Products of Walker Road, Bardonia is listed on page 84 of the consultation document as an operational (commercial and industrial) waste composting, disposal, recovery, recycling and transfer operation. This is an incorrect description. Air Products use the site for acetylene production (for which we have a licence) and for industrial and medical gas filling with a cylinder retest shop. We have associated offices and industrial space.
Council's Response The site has permission for a waste operation on the site. This was granted in 2006 related to the lime caking plant handling the waste lime from the operations undertaken on site. As such, it is an operational waste operation albeit ancillary to the main activities on the site and the description listed in the document is correct. (In the light of this response, the Company has confirmed that they wish to retain this ancillary waste operation.)	
Biffa Waste Services Ltd	We note that Table C of Appendix 1 identifies Newhurst once as a "dormant C&I recycling operation". The planning permission referred to (reference 2009/2497/02) has been implemented and is for a material recycling facility processing 55,000 tonnes of waste per annum, a composting facility processing 45,000 tonnes of waste per annum and a 6 million cubic metre landfill site. The waste types permitted are non-hazardous and could therefore include municipal waste. The table needs to be amended to reflect this.
Council's Response: Sites are only recorded as receiving Municipal Waste where this is actually taking place.	
Biffa Waste Services Ltd	No reference is made in any of the tables to the fact that the site has a live planning permission for 300,000 tonnes per annum of recovery capacity through the June 2012 planning permission for an energy recovery facility. This should be included for completeness.
Council's Response: The table of permitted C&I recovery, recycling and transfer operations has been amended in the Waste Needs Assessment.	
Lincolnshire County Council	Table P. Colsterworth Landfill site: This site is not time limited, however it should be noted that a new Energy from Waste Facility for Lincolnshire is due to come on-line at the end of this year which will deal with the vast majority of the County's residual municipal waste, and so will dramatically reduce the amount of waste going to the county's landfills. As a result it is anticipated that a number of landfills are likely to close their doors once the EFW facility has come on-line, and so at this stage we are unable to confirm whether the above site will remain available to deal with waste from Leicestershire for the duration of your plan period to 2031.
Leeds City Council	Table T. The Leeds plant at Knostrop is a long life facility dealing with liquid wastes. The site is safeguarded as such in the Leeds Natural Resources and Waste Local Plan (adopted 16 Jan 2013)
Flying Spares	Table T. I am a little confused by the figures on page 95 (of 125) of the Mineral & Waste Issues document which states that we managed 15000 tonnes of hazardous waste in 2009. I think someone may have got the figures incorrect

	somewhere along the line and a figure of 150 would be closer to reality.
Lincolnshire County Council	Table T. Canwick Waste Treatment Centre: There are no planning reasons why this site would not operate until 2031.
Warrington Borough Council	Table T. Daniels Recycling Ltd, Unit 8b, Slutchers Lane, Centre Park, Warrington, WA1 1QL. This facility received a permanent planning consent in May 2010 (2010/16145) to operate as a WEEE facility. Hence there are no planning reasons why this site would not operate until 2031. In any event, the amount of waste that the site receives from Leicestershire appears to be relatively small and intermittent (312.6 tonnes in 2010 only) and therefore it is considered that the impact on either the Leicestershire or Warrington M&W Local Plans would be minimal.
Council's Response: Comments from other WPAs noted. Figure for Flying Spares has been amended in the Waste Needs Assessment.	
Sustainability Appraisal	
Environment Agency	Table 2: Suggest additional documents that should be referenced in relation to air, water, soil and minerals; biodiversity, geodiversity, flora and fauna; climatic factors, minerals development and waste management.
Natural England	We would like to see green infrastructure given full consideration within table 2 including reference to the 6C's Green Infrastructure Strategy and relevant District GI strategies. We would also suggest that National Character Areas (NCAs) are referenced in the column on Plans, Programmes and Strategies. They provide valuable information and evidence to assist decision making regarding the restoration and afteruse of the minerals and waste sites. In the section on Biodiversity, Geodiversity, Flora and Fauna we suggest that the objective should read "To conserve and enhance biodiversity and geodiversity conservation interests, avoiding damage to or fragmentation of major features of importance for fauna and flora and to encourage links to the wider ecological and green infrastructure networks."
English Heritage	Whilst we note the contents of table 2 in relation to cultural heritage, these are very generic in nature - no reference is given to specific plans, programmes and policies, such as the Leicestershire Historic Landscape Characterisation Study. Further information in relation to documents to consider, where relevant, can be found in our guidance: 'Strategic Environmental Assessment, Sustainability Appraisal and The Historic Environment.'
English Heritage	Appendix Table D: Baseline Data, Indicators, Trends for Cultural Heritage/Landscape. This table provides very little data in relation to the historic environment within Leicestershire. Our guidance provides more details in relation to baseline data, indicators and trends. We also query the numbers of heritage assets as quoted in this table for the County, as well as the numbers at recognised as being 'at-risk.' The quoted figures differ from our records, in terms of asset numbers and quote figures on the heritage at risk register. Heritage Counts (2013) The Heritage at Risk Register (2013) and the National Heritage List for England all provide further details for this.

English Heritage	Whilst we note and welcome SA objective no.7, we consider that the terms used within this fail to reflect NPPF requirements and terminology. We consider that this should be amended to state: "To protect and, where possible, enhance the significance of heritage assets of archaeological, cultural and historic value."
English Heritage	Table 5. Cumulative impacts can also affect heritage assets, such as deterioration in landscape character. At present this is just discussed in relation to the natural environment, whereas there is the potential for historic environment impacts here as well.
Environment Agency	Information and monitoring: Progress against the waste hierarchy is a key indicator. In order to monitor this we suggest that for each level of the hierarchy the number of facilities applying for and getting planning permission should be monitored (including details of their respective land take and capacities).
Natural England	Natural England acknowledges that the Scoping Report follows the relevant legislation and accepted methodologies.
Council's Response (SA) Sustainability Appraisal has been amended to incorporate the recommended changes. Monitoring will record new waste facilities, including their capacity and type of waste management.	