

In relation to 2024/EIA/0116/LCC, and on behalf of Harborough District Council, I would like to make the following comments.

HDC understand that LCC are currently in a position whereby they are unable to demonstrate a that they currently achieve the necessary landbank target of a 7 year supply of available sand and gravel. It is also acknowledged that, between 2019 and 2021, this position continued to worsen. The proposed site is unallocated, and it is accepted that therefore Policy M3 of the Minerals and Waste plan (which states that permission will be granted provided that the proposal is for a new quarry that is required to replace an existing permitted sand and gravel site that is nearing exhaustion where it has been demonstrated that there are no potential extensions to that site or that remaining sites cannot maintain the required level of provision) would be engaged in the consideration of this application. It is also acknowledged that the Applicants have confirmed through their ES that the proposed development will be a direct replacement for Shawell Quarry, including both mineral extraction and concrete manufacturing operations, in order to continue to supply the needs of the local and regional construction sectors. Notwithstanding this, I would like to express the following concerns with the proposed extraction facility.

Landscape Impact

It is acknowledged that the impact on the surrounding landscape will, in time, be restored by way of an agreed restoration programme. Notwithstanding this, for the duration of the life of the facility, it is considered that the nature of the Proposed Development will result in a significant level of harm to the character of the surrounding landscape. HDC are concerned that the working phases of the development would not be "transitory short-lived and temporary in nature" as claimed by the applicant, and that these impacts would be felt by the community for a significant period of time (in excess of 20yrs).

Highways

Concern has been raised by the community regarding the impact of the proposal on the surrounding Highways network. Whilst Officers acknowledge these concerns, HDC would be guided by the County Highways Authority in this regard.

Residential Amenity

HDC raise concerns regarding the potential impact upon the residential amenity of dwellings located in close proximity to the site, in particular those adjacent to the north-eastern boundary of the site. It is of particular concern that processing and operational facilities have been located in this area and HDC would express particular concern regarding the potential detrimental impact upon these residents as a result of the Proposed Development.

Public Rights of Way

It is noted that a number of Public Rights of Way traverse the application site. Whilst it is accepted that the application indicates routes for the diversion of these, HDC would express concern that the Proposed Development will result in a significant detrimental impact upon the user experience and enjoyment of these routes. It is also of concern that some of the proposed diversions are quite lengthy and that some of the permanent

diversions indicated on the restoration plan do not provide the same level of connectivity as is currently enjoyed. This is particularly relevant to the north of the site where the current PRow running to the south of the A4304 providing a connection between X47 and X31 has been indicated to be permanently removed. HDC therefore consider that, contrary to the Applicants assertions within the ES, the impacts on the PRow network would not be of limited duration and significance.

Agricultural Land

HDC would raise concern about the loss of Best and Most Versatile Agricultural Land, particularly in light of the Applicant's acknowledgement that 19% of the site area is made up of this soil.

Cumulative Impact

HDC would contend the Applicant's assertion that the scope for cumulative effect associated with the adjacent Lutterworth East Strategic Development Area is considered Negligible as the schemes are well compartmentalised and generally impact on different visual receptor groups. The Proposed Development is located in very close proximity to the Lutterworth East SDA site, at their closest point there is just 75m between the two application sites. Whilst it is acknowledged that the Proposed Development is "well compartmentalised" from the residential element of the SDA, there will inevitably be cumulative landscape impacts between the proposed development and the B8 element of the site (which allows for buildings up to 18m in height) located between Warren Farm and the A4304. It is also considered that these impacts, cumulatively, could be considered to be significant, particularly in light of the proximity of PRow in this area from which both developments will be clearly visible.

Lutterworth East

Whilst not necessarily a normal Planning Consideration, HDC would also raise concerns regarding the potential impact that the Proposed Development could have upon the marketability and attractiveness of the residential element of the Lutterworth East SDA. The explanatory text to Policy L1 of HDC's current adopted Local Plan refers to the creation of a high-quality environment, the site not becoming an unwelcome accretion to the town, high standards of urban design and the creation of an attractive green environment for the future community. Officers hold concerns that the provision of a development of the scale and nature of the Proposed Development will have a significant and detrimental impact upon the aims and objectives of Policy L1 in this regard. Whilst it is accepted that the impact of the Proposed Development upon the marketability of a residential site is a commercial matter and not a Planning matter, any future impact that this could have upon the delivery of the site, and therefore the delivery of housing which is integral to the success of both the current Local Plan, but also the emerging Local Plan is of significant concern to Harborough District Council as the Local Planning Authority.

On the basis of the above, HDC would contend that the Proposed Development fails to accord with Policies DM2, DM5, DM6ii, DM10, DM11 and DM12 of the Leicestershire Minerals and Waste Local Plan, and that no material considerations (including the acknowledged shortfall in the supply of available sand and gravel within Leicestershire) outweigh these concerns.