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Dear Mr Alonso

Melton Borough Council Local Plan – Sustainability Appraisal Scoping Report

Thank you for giving the Environment Agency the opportunity to comment on the above report and I sincerely apologise for the delay in replying.

We have restricted our comments to those disciplines falling within the remit of the Environment Agency. We generally consider that the report constitutes a comprehensive evidence base (with the exception of the issue of land contamination and how it relates to the protection of controlled waters (see further comments below)). Our comments are as follows:

Flood risk

Plans, Policies and Programmes

The document [River basin management plans, updated 2022: challenges for the water environment](#) should be added to this section.

Summary of current baseline section.

Melton Mowbray and the downstream Wreake catchment benefit from two upstream flood storage reservoirs – the Scalford Brook Flood Storage Reservoir and the Brentingby Dam which significantly reduce flood risk. They do however present an elevated residual risk of flooding in the event of failure.

Key sustainability issues section.

How will climate change impact on the existing flood risk infrastructure? Scalford Brook Flood Storage Reservoir and the Brentingby Dam are more likely to overtop with wetter winters.

Biodiversity

Summary of current baseline section.

It is good to see watercourses are included as features of interest, which play a role in providing connectivity corridors and refuge for wildlife (paragraph 3.3.16). Inclusion of riparian zones would also emphasize that the need to protect watercourses extends beyond the wetted perimeter.

Paragraphs 3.4.3 and 3.51 should refer to blue infrastructure, as well as green infrastructure. Good to see BNG LNRS mentioned in paragraph 3.4.3.

Key sustainability issues section.

Paragraph 3.5.1 should describe BNG as *measurable* net gain.

Land contamination

The report doesn't appear to have commentary on the available and necessary guidance which should be considered with regards land contamination and the protection of controlled waters. We therefore have the following comments to make:

The consideration of land contamination, 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 recommend that an objective be included where appropriate within the scoping report to 'Protect and enhance the wider environment' giving particular attention to dealing with controlled waters and land contamination. The documents detailed below highlight best practice and would make a suitable reference to support achievement of the objective.

- Groundwater protection [Groundwater protection - GOV.UK \(www.gov.uk\)](http://www.gov.uk) :
- GPLC1 – Guiding principles for land contamination [Managing and reducing land contamination: guiding principles \(GPLC\)](#) ; and
- Land Contamination Risk Management (LCRM) guidance, when dealing with land affected by contamination. [Land contamination risk management \(LCRM\)](#).

The Environment Agency has been tasked to implement the Water Framework Directive. Under the Water Framework Directive, the environmental objectives for groundwater and surface water bodies are:

- To prevent deterioration in the status of water bodies, improve their ecological and chemical status and prevent further pollution.
- Aim to achieve good quantitative and good groundwater chemical status in all water bodies. For a groundwater water body to be in overall 'good' status, both its quantitative and chemical status must be 'good'.
- Implement actions to reverse any significant and sustained upward trends in pollutant concentrations in groundwater.
- Comply with the objectives and standards for protected areas where relevant.
- Hazardous substances **must** be prevented from entry into groundwater and the entry into groundwater of all other pollutants must be limited to prevent pollution.

- *Water supply and the disposal of sewage and foul water from any site should be discussed with the relevant water company and the Environment Agency to ensure no deterioration of surface water or groundwater quality.*

Although we note that new developments may need to be built outside of the existing urban area on greenfield sites, the development of brownfield sites is encouraged as it provides an opportunity to remove areas of contamination that would otherwise continue to present a risk to our environment, controlled waters and human health. It is important that adequate site investigation and remediation is carried out and groundwater issues are considered.

This approach is important for Melton as the district is situated on secondary aquifers. Secondary aquifers are permeable layers capable of supporting water supplies at a local rather than strategic scale, and in some cases forming an important source of base flow to rivers.

I hope you find the above comments useful.

Yours sincerely

Mr Nick Wakefield
Planning Specialist

