

Response ID BHLF-MWX6-MJT3-G

Submitted to Melton Local Plan Update: Issues and Options Consultation
Submitted on 2024-01-22 09:59:35

Introduction

Definitions

How to use the Issues and Options

About you

What is your name?

Name:
Nick Wakefield

What is your organisation? (if relevant)

Organisation:
Environment Agency

What is your Job Title/Role (if relevant)

Job title/role:
Planning Specialist

What is your email address?

Email:
[REDACTED]

Are you making a submission on behalf of someone else?

No

If you are submitting on behalf of someone else, please provide details:

Name (on behalf of):

Organisation (on behalf of):

About you (equalities questions)

Please provide the first 5 digits of your Postcode (for example LE13 1).

Enter the first 5 digits of your postcode:

Gender: How do you identify?

[REDACTED]

If self-describe, please state :

Would you describe yourself as transgender?

[REDACTED]

What is your sexual orientation?

[REDACTED]

If other, please state:

What is your age?

[REDACTED]

Do you consider yourself to have a health problem or a disability which has lasted, or is expected to last at least 12 months?

██████████
If you selected other, please state:

What is your ethnic origin?

Please describe your ethnicity and race:

What is your religion?

Not Answered

Please state your religion:

Vision and objectives

Relevant context to respond to the questions below

Question 1: Looking at the options above, which option do you support?

Question 1 - Option 1: No change:

Question 1 - Option 2: Refocused and simplified version [preferred option]:
Strongly agree

Question 2: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this section

Please, provide further context:

We agree with the issues identified in para's 2.2.1 and 2.2.2 regarding the current Vision and the subsequent reasons and recommendation to not retain the current Vision and Objectives. The currently worded Vision does not adequately acknowledge the reasons and need for environmentally sustainable development.

The new Vision should make it explicit that community's will be continue thrive because the location of new development, its construction and associated infrastructure have taken into account climate change. The new Vision must also place greater emphasis on the importance of a healthy and vibrant natural environment, including the importance of green infrastructure for both wildlife and communities.

Question 3: What do you think are the most important objectives to be covered by our Vision? Please select your top 3

Question 3 - Improving facilities for all of the community and providing the new infrastructure needed to support our growing population:

Question 3 - Addressing the causes and effects of climate change:

Question 3 - Ensure local housing meets the local communities current and future needs:

Question 3 - Supporting a diverse, competitive and innovative rural economy:

Question 3 - Enhancing Melton Mowbray's town centre:

Question 3 - Promoting high quality and well-designed development to help create healthy, sustainable and safe communities:

Question 3 - Enhancing nature and minimising harm to the natural environment:

Question 3 - Other (please specify below):

Please, provide further context:

We support all of the objectives to be covered. Having regard to our statutory remit and interest we particularly welcome the following:

- . Addressing the causes and effects of climate change.
- . Enhancing nature and minimising harm to the nature environment.
- . Promoting high quality and well-designed development to help create healthy, sustainable and safe communities.

Policy SS1. Presumption in favour of Sustainable Development

Policy SS1: Relevant context to respond to the questions below

Question 4: Looking at the options above, which option do you support?

Question 4 - Option 1: Delete the policy:
Strongly agree

Question 4 - Option 2: Amend the policy [preferred option]:

Question 5: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

We agree with the Inspectors comments described under Option 1 regarding the reasonableness of retaining the Policy in the Local Plan.

Policy SS3. Sustainable Communities (unallocated sites)

Policy SS3: Relevant context to respond to the questions below

Question 6: Looking at the options above, which option do you support?

Question 6 - Option 1: Delete the policy:

Question 6 - Option 2: Review the policy to better define meeting local need:

Question 6 - Option 3: Review the policy to enhance wider sustainability [preferred option]:

Question 7: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Question 8: Under what circumstances do you think new homes in the borough's smallest and least sustainable settlements are justified?

Please, provide further context:

Question 9: Do you think criteria should be introduced to require homes built in the borough's smallest and least sustainable settlements to be built to the highest sustainability standards? If yes, what types of criteria do you think the policy should consider?

Please, provide further context:

Policy SS4. South Melton Mowbray Sustainable Neighbourhoods

Policy SS4: Relevant context to respond to the questions below

Question 10: Looking at the options above, which option do you support?

Question 10 - Option 1: Delete the policy:

Question 10 - Option 2: Amend to reflect the 2021 Masterplan [preferred option]:
Strongly agree

Question 11: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

We welcome and support environmental requirements within the Policy (en2, en6, en7, en8, en9).

Policy SS5. Melton Mowbray North Sustainable Neighbourhood

Policy SS5: Relevant context to respond to the questions below

Question 12: Looking at the options above, which option do you support?

Question 12 - Option 1: Delete the policy:

Question 12 - Option 2: Amend to reflect the 2021 Masterplan [preferred option]:
Strongly agree

Question 13: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

We welcome and support environmental requirements within the Policy (en3, en6, en7, en8, en9).

Policy SS6. Alternative Development Strategies and Local Plan Review

Policy SS6: Relevant context to respond to the questions below

Question 14: Looking at the options above, which option do you support?

Question 14 - Option 1: Delete the policy:

Question 14 - Option 2: Reduce to locally specific criteria only [preferred option]:

Question 14 - Option 3: Additional criteria:

Question 15: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Definitions

Policy C2. Housing Mix

Policy C2: Relevant context to respond to the questions below

Question 16: Looking at the options above, which option do you support?

Question 16 - Option 1: Delete the policy:

Question 16 - Option 2: Amend the policy [preferred option]:

Question 17: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Policy C3. National Space Standard and Smaller Dwellings

Policy C3: Relevant context to respond to the questions below

Question 18: Looking at the options above, which option do you support?

Question 18 - Option 1: Delete the policy:

Question 18 - Option 2: Amend the policy [preferred option]:

Question 19: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Definitions

Policy C4. Affordable Housing Provision

Policy C4: Relevant context to respond to the questions below

Question 20: Looking at the options above, which option do you support?

Question 20 - Option 1: Delete the policy:

Question 20 - Option 2: Amend the policy to reflect National Planning Policy Framework and new evidence [preferred option]:

Question 21: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Definitions

Policy C7. Rural Services

Policy C7: Relevant context to respond to the questions below

Question 22: Looking at the options above, which option do you support?

Question 22 - Option 1: Delete the policy:

Question 22 - Option 2: Amend the policy [preferred option]:

Question 23: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Policy C8. Self Build and Custom Build Housing

Policy C8: Relevant context to respond to the questions below

Question 24: Looking at the options above, which option do you support?

Question 24 - Option 1: Delete the policy:

Question 24 - Option 2: Address increasing needs:

Question 24 - Option 3: Address increasing needs and add local-specific criteria [preferred option]:

Question 24 - Option 4: Adding the two optional local eligibility tests:

Question 25: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Policy C9. Healthy Communities

Policy C9: Relevant context to respond to the questions below

Question 26: Looking at the options above, which option do you support?

Question 26 - Option 1: Delete the policy:

Question 26 - Option 2: Revise the policy but also make health and wellbeing a key thread that runs throughout the entire plan [preferred option]:
Strongly agree

Question 27: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Our hesitancy to not strongly agree with Option 2 is based on the first bullet point explaining what Option 2 proposes to do. We accept and understand the desire to reduce replication and improve clarity but it should be ensured that it is the case that those health issues associated with those topics listed in brackets are indeed dealt with elsewhere.

Question 28: Do you think the Local Plan should require Health Impact Assessments for large scale developments?

Not Answered

Question 29: If you answered 'yes' to question 28, what size and types of development do you think should require them and why?

Please, provide further context:

Policy EC1. Employment Growth in Melton Mowbray

Policy EC1: Relevant context to respond to the questions below

Question 30: Looking at the options above, which option do you support?

Question 30 - Option 1: Delete the policy:

Question 30 - Option 2: Amendments to reflect Use Class Order, new evidence and National Planning Policy Framework:

Question 30 - Option 3: Create separate policies for employment allocations and employment development in Melton Mowbray:

Question 31: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Question 32: Unless submitted already as part of the Employment-only Call for Sites (June-July 2023), is there any employment site you want us to consider as a potential allocation? If there is, please submit the details, including a location plan showing the boundaries to planningpolicy@melton.gov.uk and add a note in this section

Please, provide further context:

Definitions

Policy EC2. Employment Growth in the Rural Area (Outside Melton Mowbray)

Policy EC2: Relevant context to respond to the questions below

Question 33: Looking at the options above, which option do you support?

Question 33 - Option 1: Delete the policy:

Question 33 - Option 2: Policy Wording Amendments [preferred option]:

Question 34: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Policy EC3. Existing Employment Sites

Policy EC3: Relevant context to respond to the questions below

Question 35: Looking at the options above, which option do you support?

Question 35 - Option 1: Delete the policy:

Question 35 - Option 2: Add specific class uses to policies:

Question 35 - Option 3: Adding Flexibility to the Policy:

Question 36: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Definitions

Policy EC4. Other Employment and Mixed-use Proposals

Policy EC4: Relevant context to respond to the questions below

Question 37: Looking at the options above, which option do you support?

Question 37 - Option 1: Delete the policy:

Question 37 - Option 2: Wording amendments and define Mixed-use Development:

Question 37 - Option 3: Split the Policy:

Question 38: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Town Centre and Retail Evidence

Relevant context to respond to the questions below

Question 39: Looking at the options above, which option do you support?

Question 39 - Option 1: Focus on Melton Mowbray Town Centre:

Question 39 - Option 2: Carry out a full Town Centre and Retail Study including needs assessments:

Question 40: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this section

Please, provide further context:

Definitions

Policy EC5. Melton Mowbray Town Centre

Policy EC5: Relevant context to respond to the questions below

Question 41: Looking at the options above, which option do you support?

Question 41 - Option 1: Delete the policy:

Question 41 - Option 2: Update and incorporate elements of the Town Centre Vision [preferred option]:

Question 42: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Definitions

Policy EC6. Primary Shopping Frontages

Policy EC6: Relevant context to respond to the questions below

Question 43: Looking at the options above, which option do you support?

Question 43 - Option 1: Delete the policy:

Question 43 - Option 2: Amend the policy [preferred option]:

Question 44: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Definitions

Policy EC7. Retail Development in the Borough

Policy EC7: Relevant context to respond to the questions below

Question 45: Looking at the options above, which option do you support?

Question 45 - Option 1: Delete the policy:

Question 45 - Option 2: Amend the policy [preferred option]:

Question 46: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Definitions

Policy EC8. Sustainable Tourism

Policy EC8: Relevant context to respond to the questions below

Question 47: Looking at the options above, which option do you support?

Question 47 - Option 1: Delete the policy:

Question 47 - Option 2: Clarify the policy to focus on socio-economic benefits:

Question 47 - Option 3: Amend the Policy to define sustainable tourism:

Question 48: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Definitions

Policy EN2. Biodiversity and Geodiversity

Policy EN2: Relevant context to respond to the questions below

Question 49: Looking at the options above, which option do you support?

Question 49 - Option 1: Delete the policy:

Question 49 - Option 2: Amend the policy:
Strongly agree

Question 49 - Option 3: Split the policy:
Strongly agree

Question 50: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

We agree with the pros and cons outlined for each option.

Option 2:

This option has the potential to make the one policy laid out in the most accessible way for both developers and consultees. Option 3:

Although the number of policies within the Local Plan would increase, this simply demonstrates the need and importance to protect Melton's Biodiversity and Geodiversity as part of the wider (inter)national biodiversity crisis. Also, as stand-alone criteria, each policy topic has the potential to be seen to be given extra weighting – in a positive way.

Whichever option is chosen, the policy(ies) should include reference to blue infrastructure, watercourses, and other wetland habitats. For example, when referring to Biodiversity Net Gain, reference to the Watercourse Metric should be made.

Definitions

Policy EN3. The Melton Green Infrastructure Network

Policy EN3: Relevant context to respond to the questions below

Question 51: Looking at the options above, which option do you support?

Question 51 - Option 1: Delete the policy:

Question 51 - Option 2: Amend the policy [preferred option]:
Strongly agree

Question 52: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

We agree with the justifications made by the council.

We advise that the Policy title is amended to The Melton Green and Blue Infrastructure Network.

The following should be considered for inclusion within the Policy:

“Developments shall protect and enhance the Green (and Blue) Infrastructure (G&BI) within Melton Borough Council by helping to maximise its:

. Extent, whilst having regard to the development needs of the borough.

. Interconnectedness, enabling individual pieces of G&BI to deliver greater benefits through links to the wider network;

. Multi-functionality, whilst not detracting from the important primary functions of individual pieces of infrastructure.

. Quality, ensuring that it can meet its various functions as effectively as possible.

In responding to the above points, developments shall:

- . Respond to the specific location, characteristics and surroundings of the site to take opportunities to incorporate G&BI that can most effectively benefit the wider area, for example providing sustainable urban drainage systems that address identified problems such as flood risk and water quality, and deliver environmental and quality of life benefits;
- . Ensure that G&BI is central to the design, rather than being relegated to 'left-over' land;
- . Use land and building surfaces creatively to maximise on-site GI provision, particularly within any areas where there are currently major GI deficits
- . Ensure that appropriate long-term management and maintenance measures are in place for any G&BI".

Policy EN5. Local Green Spaces

Policy EN5: Relevant context to respond to the questions below

Question 53: Looking at the options above, which option do you support?

Question 53 - Option 1: Delete the policy:

Question 53 - Option 2: Incorporate Green Belt criteria:

Question 53 - Option 3: Designate additional Local Green Spaces:

Question 54: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Question 55: If you wish to propose a new area for Local Green Space, please send a map and supporting information to planningpolicy@melton.gov.uk and add a note in this section

Please, provide further context:

Policy EN7. Open Space, Sport and Recreation

Policy EN7: Relevant context to respond to the questions below

Question 56: Looking at the options above, which option do you support?

Question 56 - Option 1: Delete the policy:

Question 56 - Option 2: Update the policy, particularly the standards [preferred option]:

Question 57: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Policy EN8. Climate Change

Policy EN8: Relevant context to respond to the questions below

Question 58: Looking at the options above, which option do you support?

Question 58 - Option 1: Delete the policy:

Question 58 - Option 2: Delete the policy, and make climate change a 'core thread' that runs throughout the entire plan:

Question 58 - Option 3: Retain but update policy EN8 and make climate change a core thread that runs throughout the entire plan [preferred option]:
Strongly agree

Question 59: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Making climate change a core thread that runs throughout the entire plan embeds this critical issue as a priority for the whole Plan – something which we welcome and strongly support. It is equally important to ensure this is underpinned by a strong Vision and Objectives. We welcome the ways in which it is proposed the policy will be revised. On sustainability statements, we consider this element could be made more definitive by stating when they will be required, rather than may be required, if this is possible. We strongly advise that the revised wording of the policy states that the applicant is required to set out how the requirements of the policy have been complied with.

Policy EN9. Ensuring Energy Efficiency and Low Carbon Development

Policy EN9: Relevant context to respond to the questions below

Question 60: Looking at the options above, which option do you support?

Question 60 - Option 1: Delete the policy:

Question 60 - Option 2: Refocus the policy and split it into new more specific policies as required [Preferred approach]:
Somewhat agree

Question 60 - Option 3: Make the policy more robust and specific, to ensure all new development meets the highest standards:
Somewhat agree

Question 61: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

We understand the Councils justification for Option 2 being the preferred approach and accept that this is probably the most pragmatic and efficient course to follow at the present time. However we would not want this to preclude the Council pursuing Option 3 when developing a new local plan for the future. We would strongly support this approach being taken and it would be an opportunity for the council to be seen as an exemplar in this important aspect of climate change.

Policy EN10. Energy Generation from Renewable and Low Carbon Sources

Policy EN10: Relevant context to respond to the questions below

Question 62: Looking at the options above, which option do you support?

Question 62 - Option 1: Delete the policy:

Question 62 - Option 2: Review the policy to ensure it works well for all types of renewable energy schemes [preferred approach]:
Strongly agree

Question 63: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

It is important for local factors to be able to be a consideration. We are supportive of sustainable renewable energy in a manner which protects and enhances the environment, whether on a local, regional, national or international level. While we do not favour particular renewable schemes over others, we are supportive of technologies and approaches which consider environmental risks early and comprehensively and which minimise the impacts and risks to people and the environment – air, land and water. The technologies and approaches used must also be fit for the future, including resilience to the impacts of climate change.

Policy EN11. Minimising the Risk of Flooding

Policy EN11: Relevant context to respond to the questions below

Question 64: Looking at the options above, which option do you support?

Question 64 - Option 1: Delete the policy:

Question 64 - Option 2: Add new elements of national policy:
Somewhat agree

Question 64 - Option 3: Restrict policy to strategic overview and local matters:
Somewhat agree

Question 65: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Policy EN11 largely reinforces the National Planning Policy Framework (NPPF) and planning practise guidance (PPG). Melton Borough Council should consider whether repeating these requirements within Policy EN11 adds any weight to planning decisions. The Environment Agency uses NPPF and PPG with considerable weight when responding to planning consultations.

Option 3 seeks to simplify EN11 by removing the technical requirements which are detailed within NPPF and PPG. The Environment Agency has no concerns with this approach. The review of EN11 provides an opportunity to strengthen national flood risk policy and guidance, particularly around

capitalising on the opportunities presenting by new development to reduce off-site flood risk. Melton is in a rare position geographically, with the source of its dominant river catchments being within the borough and receiving very little flow from neighbouring authorities. This gives Melton a greater level of control on its flood risk, so there are greater direct benefits to Melton of having strong local policy around preserving and enhancing natural flood plains. Paragraph 170 of the NPPF states that 'where possible, [development] will reduce flood risk overall'. The wording of this statement provides developers an opportunity to not provide off-site betterment. This could be strengthened by EN11 by requiring all major development within 8 metres of a main river (and ordinary watercourse) to enhance the river corridor through the creation of additional flood storage capacity and riparian habitat. Such enhancements to the River Wreake, River Eye, Scalford Brook, Thorpe Brook, Burton Brook and Austen Dyke, would provide greater flood resilience to Melton Mowbray and the downstream villages along the Wreake Valley.

Definitions

Policy EN12. Sustainable Drainage Systems

Policy EN12: Relevant context to respond to the questions below

Question 66: Looking at the options above, which option do you support?

Question 66 - Option 1: Delete the policy:

Question 66 - Option 2: Incorporate additional requirements:
Strongly agree

Question 67: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

We agree with the ways in which it is suggested the policy should be enhanced. We do also wish to advise the council on the following: In January 2023 Defra announced its intention to implement Schedule 3 of the Flood & Water Management Act. It intends to do this sometime during 2024. Its implementation will change the role of the planning system on SuDS and therefore alter the approach Local Plans should take on this topic. The approach needed will depend on the timings of the Local Plan relative to the implementation of Schedule 3, and will depend on the final details of how Defra implements Schedule 3.

Following implementation of Schedule 3, Local Plans will need to focus on:

- Setting out requirements for the use of SuDS on developments which fall outside the scope of Schedule 3 (e.g. developments that fall below Schedule 3 thresholds)
- Managing the interface between planning and Schedule 3 for both site allocations and windfall development (e.g. including policies that require windfall development proposals to include information at the planning application stage to provide the LPA with confidence that Schedule 3 approval can subsequently be obtained AND ensuring the Local Plan is supported with sufficient evidence that the principle of site drainage is established before a site is allocated)
- Ensure density assumptions (e.g. the quantum of development that can be accommodated on proposed site allocations) account for the space needed to accommodate Schedule 3-compliant SuDS
- Supporting and encouraging SuDS retrofit proposals (e.g. for surface water flood risk management or addressing storm sewer overflow issues)

Where there is a likelihood that a Local Plan will be adopted prior to Schedule 3 implementation, it will be prudent for the Local Plan to include policies to steer development that may come forward during that period. Relevant policies should also include a fall-back approach, in line with the above, for when Schedule 3 implementation takes place.

Policy IN1. Melton Mowbray Transport Strategy

Policy IN1: Relevant context to respond to the questions below

Question 68: Looking at the options above, which option do you support?

Question 68 - Option 1: Delete the policy:

Question 68 - Option 2: Reflect the latest position in the policy [preferred option]:

Question 69: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Definitions

Policy IN2. Transport, Accessibility and Parking

Policy IN2: Relevant context to respond to the questions below

Question 70: Looking at the options above, which option do you support?

Question 70 - Option 1: Delete the policy:

Question 70 - Option 2: Amend policy wording to align with national and local guidance [preferred option]:

Question 71: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Policy IN4. Broadband

Policy IN4: Relevant context to respond to the questions below

Question 72: Looking at the options above, which option do you support?

Question 72 - Option 1: Delete the policy:

Question 72 - Option 2: Amend policy [preferred option]:

Question 73: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Definitions

Policy D1. Raising the Standard of Design

Policy D1: Relevant context to respond to the questions below

Question 74: Looking at the options above, which option do you support?

Question 74 - Option 1: Delete the policy:

Question 74 - Option 2: Review and strengthen policy so it sets out strategic principles for high quality new development [preferred option]:
Strongly agree

Question 75: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

We strongly agree with the councils reasons for not favouring Option 1 and support the reasoning given for adopting Option 2.

Question 76: Do you think the current design policy criteria covers all design issues adequately, that the current policy works well? Would you like to suggest any criteria to be added or removed from the policy?

Please, provide further context:

The list of criteria in the current Policy does not adequately include the requirement for the design to take account of climate change and build into the design the consequently appropriate mitigation and adaptation measures. For example, the design code is an opportunity to require measures which reduces the risks of, and increase the resilience to flooding. A criteria of the code could and should be to require multifunctional green and blue infrastructure as an integral part of new development, where at all feasible.

Question 77: How important do you think each of the following design considerations are for a new development?

Question 77 - Attractiveness: creating a pleasant environment to live and work:

Question 77 - Sensitive to context: responds well to its surroundings:

Question 77 - Distinctiveness: builds upon the unique characteristics of its surroundings and creates a sense of place in itself (design features such as scale, massing, materials, landscaping and architectural detailing).:

Question 77 - Neighbour amenity: does not adversely affect neighbours and nearby uses:

Question 77 - Legible places: places that are easily understood by their users, particularly when moving around.:

Question 77 - Connectedness: created new and weaves into existing networks:

Question 77 - Comprehensive: ensuring development is designed and delivered in a coordinated way, and avoiding piecemeal schemes:

Question 77 - Safe and attractive streets and spaces: create spaces and environment that feels safe and secure to be in.:

Question 77 - Environmental sustainability and adapting to climate change:

Question 77 - Mix of uses: the right range of uses and densities:

Question 77 - Protecting and enhancing heritage assets:

Question 77 - Car parking:

Question 77 - Community consultation: opportunities for community to get involved and help shape development proposals:

Question 77 - Other: please state below any other key design considerations not highlighted above:

Please, provide further context:

From the perspective of the Environment Agency's remit 'Environmental sustainability and adapting to climate change' is an extremely important design consideration.

Question 78: Do you think there is a need for specific policy guidance about the use of design coding within the local plan?

Not Answered

Question 79: If you responded 'yes' to question 78, please provide reasons?

Please, provide further context:

Equalities Impact

Question 80: Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010?

Not Answered

Question 81: If you responded 'yes'/'unsure' to question 80, please provide your reasons and whether there is anything that you think could be done to mitigate any impacts identified

Please, provide further context:

Appendix A. Summary of the conclusions of the Local Plan Review

Sustainability Appraisal Scoping Report

Please use the comment box below to provide any information you would like us to consider in relation to the Sustainability Appraisal Scoping Report

Please, provide a reference to the section and your comments:

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 Salford 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? Salford 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 3.5.1 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) :
- 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.