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John Wright
Team Leader Mineral and Waste Planning
Leicestershire County Council
County Hall
Glenfield
Leicester
LE3 8TE

Dear Sir

CONSULTATION ON LEICESTER AND LEICESTERSHIRE WASTE DEVELOPMENT FRAMEWORK

Thank you for your letter and enclosures dated 14th August 2006 and for the opportunity to comment on the above documents.

Core Strategy & Development Control Policies

The Agency agrees with the statement at section 9.14 and supports **Policy 21** to minimise the impact on the environment and to work towards sustainable development.

The Agency fully supports the statement made in section 9.20 and the contents of **Policy 26**. It is pleasing to see a document that is inclusive of flood risk within its framework.

The Agency welcomes **Policy 28** and the information that is required in support of a planning application, in particular items 24, 25 and 26.

The Agency approves of statement 10.16 and **Policy 31**. Policy 31 includes a list of general headings for conditions that may be included within planning applications and we note that the list is not exhaustive. Item 19 "protection of the water environment" is more aligned with water quality, and the Agency requests that an additional item is added to the list to specifically address the issue of flood risk. Conditions could seek, for example, to implement a scheme for flood risk compensation work. The provision of a waste management facility could divert flood flow, enhancing flood risk to properties in a locality. The item could be headed "Prevention of Flood Risk".

Statement 10.18 and **Policy 32**:- it is noted that a planning obligation may be entered into to monitor the water environment. There may be the need for flood risk compensation works associated with a waste management activity that can only be secured through the implementation of off-site works. PPG25 Paragraph 61 and Circular 05/05 provide appropriate guidance.

Site Allocations - Preferred Options

Site No.1 - Whetstone RHWS

The site lies adjacent to the floodplain of the River Sense and is near to the confluence with the River Soar. The following additional planning requirement should be added for this site:

Floodplain

A flood risk assessment should be submitted with any application to develop the site to ensure that a) no loss of floodplain occurs, and b) no increase in surface water runoff occurs as a result.

Site Nos. 2 & 4 - Loughborough RHWS and Land off Coventry Road, Narborough

The Agency agrees with the comments as the sites are adjacent to the Hermitage Brook and River Soar respectively and their associated floodplains.

Site No. 3 - Swains Park

The site does not lie within a floodplain but does have the potential to increase flood risk associated with surface water run off. The following additional planning requirement should be added for this site:

Floodplain

A flood risk assessment should be submitted with any application to develop the site to ensure that no increase in surface water runoff occurs as a result The flood risk assessment should investigate the use of Sustainable Drainage Systems and also the effects of climate change.

Site No. 9 - Ulverscroft Road

It should be noted that the Willow Brook runs in culvert at some depth under the site. Potential impact on the culvert from structures sited in close proximity should be considered in the flood risk assessment.

Site 10 - Sunningdale Road

The site lies at the headwaters of either the Lubbethorpe Brook/Braunstone Brook. Both are heavily engineered channels which have been a source of flooding in the past. It is essential therefore that the following planning requirement is added:

Floodplain

A flood risk assessment would be required for the management of surface water runoff from the site. There should be no overall increase in surface water discharge from the site with additional flows being attenuated prior to discharge.

Site No. 11 - Hemington Quarry

We note that the proposal is for the continued use of an existing recycling facility. It should be noted that the Agency would be likely to **OBJECT** to any proposal to significantly increase the capacity of the site due to the high level of flood risk from the River Trent. We note the requirement for a flood risk assessment, but given that the entire site appears to lie within the floodplain, the only possibility would seem to be to rearrange existing site activities.

Site No. 12 - Little Wigston

