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**Our ref:** LT/2006/000046/OR-  
43/PO1-L01  
**Your ref:** Email 25 June 2020  
**Date:** 11 August 2020

Dear Mr Fiz Alonso

### **Hoby with Rotherby Neighbourhood Plan - regulation 16 consultation**

Thank you for giving the Environment Agency the opportunity to comment on the Hoby with Rotherby Neighbourhood Plan (the 'Plan') and thank you for the extension of time allowing us to respond.

We have reviewed the submitted documents and from the remit of the Environment Agency we have the following comments to make.

We broadly support the aspirations laid down in the Plan.

#### Policy 4

The Plan has rightly identified the significant amount of floodplain associated with the River Wreake and which lies between Hoby and Rotherby. We note the Plans designation of this area as a 'green wedge' with a view to restricting development. We would welcome this aspiration since it has the effect of ensuring any new development within the Plan area will be steered towards those areas of land at least risk of flooding.

#### Climate Change and Low Carbon Energy

We welcome the commitment shown by residents to support the need to mitigate the effects of climate change, with new development being scrutinised for their sustainability and energy efficiency.

#### Policy 8

We have the following comments to make regarding bullet points 1, 2 and 8.

1. We feel that this could be strengthened by replacing 're-creation' with

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- 'enhancement'*. This would have the effect of ensuring as part of new development opportunities are sought for, for example, new ecological networks.
2. We welcome the importance placed on biodiversity net gain (in line with the latest version of the NPPF).
  8. We advice that a bullet point should be added which states:  
*"it has identified and assessed the risks of all forms of flooding to and from the development and demonstrates how these flood risks will be managed so that the development remains safe throughout its lifetime, taking climate change into account;and"*

Regarding bullet-point b), we are not clear what 'to minimise predicted water discharge' is referring to. If this relates to water consumption then the Environment Agency would advise that the figure of 110 litres per person per day is adopted in all new developments.

We assume that bullet-point c) is referring to the culverting of watercourses. The Environment Agency opposes the culverting of watercourses due to the adverse impact it can have on the water environment/habitat and also the very real potential of it to increase flood risk. We would therefore advise that careful consideration is given to either amending or even removing bullet-point c) completely.

We hope you find the above points useful and again I apologise for the delay in replying to the consultation.

Yours sincerely

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