

Hinckley & Bosworth Borough Council  
Development Services  
Hinckley Hub Rugby Road  
HINCKLEY  
Leicestershire  
LE10 0FR

**Our ref:** LT/2024/128725/01-L01  
**Your ref:** 24/00451/FUL  
**Date:** 15 August 2024

Dear Sir/Madam

**PROPOSED HARDSTANDING, TREE PLANTING, STORAGE TANK AND  
ASSOCIATED WORKS  
MANOR HILL FARM LEICESTER LANE DESFORD LEICESTER LEICESTERSHIRE  
LE9 9JJ**

Thank you for consulting the Environment Agency on the above application.

**Environment Agency Position:**

We have to object to this application. Paragraph 180 of the National Planning Policy Framework states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of water pollution.

In this case we consider that the proposed development may pose an unacceptable risk of causing a detrimental impact to Rothley Brook water quality (and groundwater) because the proposal does not meet the minimum regulatory standards; we believe the proposal may cause pollution to both groundwater and surface water.

We understand that the development outlined in the Planning Application is to be for the making and storing of crop silage and its associated effluent. Any structure used to store/make silage and its effluent in England is required to comply with the Water Resources (Control of Pollution) (Silage, Slurry and Agricultural Fuel Oil) (England) Regulations 2010, as amended (otherwise referred to as 'SSAFO').

To overcome our objection the applicant must:

1. Provide a written plan indicating what measures and materials will be used to ensure the structure and operation comply fully with the Water Resources (Control of Pollution) (Silage, Slurry and Agricultural Fuel Oil) (England) Regulations 2010, as amended (otherwise referred to as 'SSAFO'). Link to legislation: [The Water Resources \(Control of Pollution\) \(Silage, Slurry and Agricultural Fuel Oil\) \(England\) Regulations 2010 \(legislation.gov.uk\)](https://www.legislation.gov.uk/uksi/2010/1251/contents/make)
2. Schedule 1 of the aforementioned SSAFO Regulations set out the requirements, including British Standards, for the safe and legal storage of silage and its effluent.
3. Additional Environment Agency guidance can be found here: [Factsheet 3 silage making and storing in silos Feb 2023.pdf \(projectblue.blob.core.windows.net\)](https://projectblue.blob.core.windows.net/factsheet3silagemakingandstoringinsilosFeb2023.pdf)

Environment Agency  
Trent Side North, West Bridgford, Nottingham, NG2 5FA.  
Customer services line: 03708 506 506  
[www.gov.uk/environment-agency](https://www.gov.uk/environment-agency)

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4. Detailed planning, materials and construction guidance and standards can be found in these independent Construction Industry Research and Information Association (CIRIA) documents: "CIRIA Livestock Manure and Silage Storage Infrastructure for Agriculture Part 1", Section 4; and "CIRIA Livestock Manure and Silage Storage Infrastructure for Agriculture Part 2", Section 6. [Item Detail \(ciria.org\)](http://ciria.org)
5. The base must have drainage collection channels around the outside which are constructed of materials which meet the standards set out in the SSAFO Regulations – we do not consider clay channels suitable. The site is on Sandstone classed as Secondary Aquifer and close to a tributary of the Rothley Brook.
6. With regards to the proposed above ground effluent tank, the base must be constructed to withstand the maximum volume of material that can be stored in the tank, including any future expansion of the tank (e.g., additional rings that may be added), and take into account dept to water table. A methodology for the safe and secure transfer of effluent to/from the tank must also be detailed.
7. We require updated plans and drawings for approval by this Agency, and a post-construction inspection prior to use.

Applicant shall liaise with Graham Dixey – [graham.r.dixey@environment-agency.gov.uk](mailto:graham.r.dixey@environment-agency.gov.uk)

Yours faithfully

**Ms Huda Al Tahhan**

**Planning Advisor**

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