

High Peak Borough Council
Municipal Buildings Market Place
Glossop
Derbyshire
SK13 8AF

Our ref: LT/2006/000102/OR-
06/IS1-L01

Your ref:

Date: 16 June 2023

Dear Sir/Madam

Draft Whaley Bridge Neighbourhood Plan proposal

Thank you for consulting the Environment Agency on the draft Whaley Bridge neighbourhood plan. It is worth noting that we have already supplied comments in relation to a previous version of the draft plan on 20th June 2022.

As such our comments below will draw upon those previous comments.

WB-G3 – Residential Development

In our previous comments we highlighted that this policy supports residential development within the settlement boundary and within the Town Centre boundary which remains unchanged. We did point out that there are areas within Whaley Bridge which are situated within flood zones 2 and 3. As such any proposed development will need to follow the flood risk requirements of the National Planning Policy Framework (NPPF) and Policy EQ11 (Flood Risk management) found within the adopted High Peak Local Plan.

While we are pleased to see that within the interpretation section reference has been made to policy EQ11 we would still recommend that mention is made that parts of Whaley Bridge fall within flood zones 2 and/or 3 and therefore any proposals will need to follow the requirements of both the NPPF and policy EQ11.

WB-E1 – Sustainable Design

We wish to reiterate our previous response as this is still relevant to the latest iteration of the NHP as our previous advice does not appear to have been incorporated into the updated document. We would still advise that the below advice, provided in our June 2022 response is taken prior to publication of the NHP.

The NHP should also include within this sustainable design policy a requirement for all new residential development to meet the tighter water efficiency measures of 110 litres per person per day. Producing mains water, treating waste water and in-home water heating has significant embedded energy and requires chemical

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

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inputs, therefore reducing water demand per capita by requiring the tighter standard of 110 l/p/d could lead to significant reductions in the associated carbon emissions.

WB-E3 – Natural Environment

We would like to reiterate our previous comments as while we are encouraged by the inclusion of the requirement for new development to create biodiversity new gain (BNG) we would still recommend that you mention the minimum requirement of 10% net gain and encourage net gain more than the minimum where possible. Our previous response is pasted below for completeness.

We welcome that this policy requires development to provide biodiversity net gain (BNG). The Environment Bill requires a 'minimum of 10%' BNG though your neighbourhood plan may want to consider the suitability and opportunities to ask for biodiversity net gain that is greater than the 10% minimum requirement.

WB-E5 – Local Green Space

We would again reiterate our previous response which is pasted below.

We welcome that there is a policy asking to enhance or provide green infrastructure as part of the development. This policy should also include mention 'blue infrastructure' as it would be beneficial to link it with green infrastructure. Development should integrate and increase blue/green infrastructure to build in multi-functional solutions to future impacts such as increased flood risks, water shortages and overheating. Blue and green infrastructure can work together to achieve these aims.

It should be noted that Green Infrastructure is also mentioned within policies WB-E1 – Sustainable Design and WB-T2 – Active travel and therefore the above comments are also pertinent to these policies.

Yours faithfully

**Mr Goldsmith
Planning Specialist**