

Environment Agency comments on the Ripley neighbourhood plan

We welcome the opportunity to comment on the Ripley Neighbourhood Plan. The plan sets out many good policies which promote sustainable development within the Ripley neighbourhood. However there are a few areas we consider could be strengthened within the document and we have detailed these below.

Housing Page 2

We support the objective to direct housing to previously developed land, but we think the plan should recognise the need to consider contamination issues.

It is also important that housing is not at risk of flooding and run off from new development does not cause flooding elsewhere.

We therefore propose 2 new objectives

Add

2. To steer development to previously developed site which are then fully assessed and contamination issues dealt with before any on site development
6. To avoid housing in areas at risk of flooding and to ensure new development does not increase the flood risk in other properties

Environment and Ecology Page 3

We support the objectives on environment and ecology, but consider the particular value of rivers and canals should be recognised in the document

Add

- To ensure development does not have a negative impact on watercourses and where possible use development to improve the water environment

Community facilities Page 4

We consider community facilities should include ones that support recycling

Add

- Encourage recycling by ensuring there is sufficient local public amenity sites for recyclable waste

Sustainability page 5

The sustainability section page 5 focuses exclusively on sustainable transport. We consider sustainability should focus on the integration of economic, social, resource efficiency and the environment issues. We suggest the addition of the following bullet

Add

- To value and protect green and blue infrastructure and recognise the services they provide to people and wildlife
- To minimise the impact on the environment by reducing the use of material and energy.

Actions and requirement for new housing development Page 12

The plan sets out actions and requirements for new housing development which include recognition of the importance of open space. We support this, but consider the multifunctional uses of green space should be included in the plan.

Integrating Sustainable Drainage Systems such as Swales and ponds into green space can reduce surface water and therefore reduce flood risk. They also reduce pollution into rivers and canals and support recharge of aquifers as well as supporting wildlife.

Add

The developer must design and locate new open spaces to ensure that they connect to other open space *and incorporate Sustainable Drainage Systems where appropriate.*

H6 housing criteria page 16

We consider an essential aspect of new housing is that it is not at flood risk or will cause additional flood risk to other properties. We therefore consider the housing criteria should reflect these concerns

We also support the incorporation of open space, but this needs to be used for the maximum benefit of people and wildlife as well as being maintained in the longer term

Add

- No development to be in an area of high flood risk or increase flood risk to other properties
- The development incorporates Sustainable Drainage Systems into public open space. A plan for the long term maintain of this space is agreed at the development stage.
- Where possible or appropriate culverts will be removed and rivers will be naturalised

Resource efficiency is a key pillar of sustainable development, but one that we consider could be strengthened in the plan. To redress this we suggest an additional criteria be added

Add

- To promote resource efficiency, recycling and reuse of material in the building and ongoing use of houses in the area.

Explanatory Requirements for policy H6 Page 18

In terms of car parking we consider it is important that it provides a function as well as looking aesthetically pleasing. Permeable paving can greatly reduce surface water runoff and so reduce the risk of flooding to properties. Small planted areas called 'rain gardens' can be built between properties to collect rain water from impermeable areas such as roads, giving an attractive roadside and importantly even more protection from surface water flooding.

We would therefore suggest the addition if the following

Add

- All parking areas should to be made from impermeable paving or incorporate other appropriate Sustainable Drainage System
- Planting between properties to be in the form of 'rain gardens' where possible

Open space and other green spaces page 19

We welcome the recognition in the plan of the importance of green space and the need to improve it within the Ripley neighbourhood plan. There is evidence that access to green/blue space improves physical and mental health, raises house prices and attracts inward investment.

We welcome the identification of the Butterley reservoir and Cromford canal as open space assets. To strengthen this we consider there should be an objective to protect and enhance these important assets and other blue infrastructure in the Ripley area.

Ripley Neighbourhood plan objectives for Environment and Ecology

Page 30

The UK must comply with the Water Framework Directive which requires all water bodies to reach good ecological status or potential. The Environment Agency produces River Basin Management Plans which set out the ways public and private organisation can help achieve the target. Development has a key role in helping the UK meet these targets and we think this should be recognised in the Ripley neighbourhood plan.

Add

4. to value, protect and enhance rivers, canals and lakes /reservoirs in the area.

EE2 Development affecting sites and features of Biodiversity interest

page 32.

We consider this policy should recognise the importance to wildlife of river and canal corridors.

Add

- Result in no detriment to water quality and an improvement and enhancement to the river corridor for the benefit of wildlife

We hope you find these comments useful. If you have any questions relating to them please do not hesitate to contact me.

Kind regards

Amanda Patterson

Sustainable Places Team - Midlands East Area

Tel: 07802 533944

Email: amanda.patterson@environment-agency.gov.uk

Address: Environment Agency, Trentside Offices, Scarrington Road, West Bridgford, Nottingham NG2 5BR