

Rushcliffe Borough Council  
Civic Centre Pavilion Road  
West Bridgford  
Nottingham  
NG2 5FE

**Our ref:** LT/2006/000353/SD-  
07/IS1-L01  
**Your ref:**  
**Date:** 09 October 2025

Dear Sir/Madam,

**Environment Agency Response to: East of Gamston/North of Tollerton  
Development Framework Supplementary Planning Document – Consultation**

Thank you for consulting the Environment Agency on the East of Gamston/North of Tollerton Development Framework Supplementary Planning Document (SPD). As the Environment Agency is not a statutory consultee we only have brief comments to make. We trust these are useful. If you would like further specific comments, please contact me.

We have already made substantial responses towards planning applications submitted at this site under references: 24/00347/HYBRID and 20/03244/OUT. We will continue to engage with you on any future planning applications at the site or matters related to the applications above.

The SPD outlines an indicative Blue Infrastructure plan. It is not totally clear that all the indicative attenuation basins are located outside flood zone 3. These should be located outside the design flood (1 in 100 year event plus an allowance for climate change) and ideally outside flood zone 2.

The Development Framework makes one mention of "Natural Flood Management" in the "Summary of Sustainability proposals". The east of the site particularly provides opportunities to incorporate natural flood management measures. These could be incorporated into the area identified as "Water Meadows" and support the aspiration of creating wetland habitats. We would support more prescriptive guidance regarding the inclusion of natural flood management measures, if you would like to explore this further, we would be happy to discuss the opportunities that might be present across the site.

The site wide design code provides the opportunity to be more prescriptive regarding water consumption. New development has the opportunity to provide exemplar design and as such we would welcome the inclusion of 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 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.

### BNG & SuDS Advice

The Environment Agency is aiming for our own projects to provide 20% BNG and providing BNG within Blue-Green Infrastructure interventions could be a positive way of reaching and exceeding national requirements where feasible. Biodiversity net gain should also play a part in providing wider environmental net gain and can be incorporated within green and blue infrastructure and other Natural Flood Management (NFM) opportunities.

New 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-Green infrastructure can work together to achieve these aims, for example sustainable urban drainage schemes (SuDS) providing attenuation to surface water, but also providing opportunities to improve water quality, encourage infiltration to groundwater through passive (no energy) design, as this can contribute to aquifer recharge and improve the water quality of surface watercourses by intercepting pollutants, as well as providing open space for local residents to enjoy.

Yours faithfully,

**Mr Joshua Milsom**  
**Planning Advisor**

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