

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

**Our ref:** LT/2006/000353/OR-  
11/IS1-L01  
**Your ref:**  
**Date:** 30 September 2023

Dear Sir/Madam

### **Tollerton Draft Neighbourhood Plan - Regulation 15**

Thank you for consulting the Environment Agency on the above Neighbourhood Plan and please find our comments detailed below.

#### **General Comments Flood Risk**

While the main settlement of Tollerton lies within flood zone 1 the wider red line boundary of the Tollerton neighbourhood plan area does have pockets of flood zones 2 and 3 located within it. The flood risk in this case emanates from the Polser Brook which is classified as an ordinary watercourse.

While it is extremely unlikely that any development will be proposed within flood zones 2 or 3 nonetheless in accordance with the National Planning Policy Framework (NPPF) para 100-102, we recommend the Sequential Test is undertaken when allocating sites to ensure development is directed to the areas of lowest flood risk. The Sequential Test should be informed by the Local Planning Authorities Strategic Flood Risk Assessment (SFRA).

It should be noted that the Environment Agency only give feedback on fluvial flood risks. Please note that surface water and ordinary watercourses fall within the remit of the Lead Local Flood Authority (LLFA) who in this case are Nottinghamshire County Council. They may hold modelled data relating to these elements.

#### **Policy Specific Comments**

##### **Policy 1: Climate Change**

We agree with the main principles of this policy however we believe that the policy could go further and be more specific in areas which are detailed below.

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

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meet the tighter water efficiency measures of 110 litres per person per day, unless it can be demonstrated that this is not feasible.

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.

### **Policy 7: The Green Buffer at Gamston Fields**

We generally support this policy although the green buffer offers the opportunity to implement Green/Blue Infrastructure requirements within policy 7. Green/Blue Infrastructure would allow linkage between Tollerton and the Gamston Fields development to build in multi-functional solutions to future impacts such as increased flood risks, water shortages and overheating.

Green and Blue Infrastructure can work together to achieve these aims and therefore it would be beneficial to highlight this within this NHP. 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.

### **Policy 12: Biodiversity Enhancement**

We welcome that the document highlights the opportunity to provide biodiversity net gain. The Environment Bill has now been approved through parliament requiring development to provide a minimum of 10% biodiversity net gain and we are pleased to see that the NHP encourages BNG in excess of the mandated 10%.

The Environment Agency would support a target for Biodiversity Net Gain (BNG) greater than 10%. The Environment Agency is aiming for our own projects to provide 20% BNG and providing BNG within Green/Blue 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.

We would reiterate the same comments regarding Green/Blue Infrastructure as detailed within our comments relating to policy 7 above. As previously mentioned well designed Green/Blue Infrastructure can provide seamless linkage between settlements and green spaces. These interventions not only provide valuable environmental benefits but also provide valuable walking and cycling routes and reduce the requirement for travel by car.

### **Policy 15: Tollerton Housing Strategy**

We are in general agreement with the wording of this policy and are particularly pleased to see the requirement for all new housing to reduce emissions and energy usage through the inclusion of passive solar gain, passive cooling and water reduction techniques.

It may be prudent to also include the requirement for tighter water efficiency targets as

indicated within our comments on policy 1.

Yours faithfully

**Planning Advisor**