Dear Sir/Madam

Rushcliffe Local Plan Part 2

Thank you for consulting us on the pre-submission version of your Local Plan Part 2.

We can confirm that we are in full support of the Local Plan, and we do not have any issues with either the current content or the proposed soundness.

We have not only worked with your Authority during the statutory consultation periods, we have also had involvement between consultations where we have been given the opportunity to comment on, and help shape, site specific and strategic policies. Whilst we acknowledge that some of the sites have been proposed within areas of flood risk, we are mindful that prior to the publication version being published for consultation, we were sent a copy of your Authority’s flood risk sequential test. It is not our role to comment on the technical detail of this process, but none the less, we are supportive of the fact it has been carried out. We would like to point out, however, that we have been unable to find the document in your online evidence base, so it may be worth publishing this at some point to show that this has been carried out.

We are also content that where development comes forward in areas of flood risk, the strategic and site specific policies will ensure that this only happens where existing and/or potential flood risk is adequately mitigated and improved. There is clear guidance on what we would expect to see in a Flood Risk Assessment (FRA), in the supporting text for Policy 17. Paragraph 5.19 is particular important as it clearly states that ‘more vulnerable’ development in the highest flood risk areas (Flood Zone 3b, the ‘functional floodplain’) will only be considered as a ‘last resort’, for regeneration purposes, where any development would be required to ‘reduce the existing levels of flood risk to both application site and third parties’. This is the only situation where we would consider development in these areas as in anyway appropriate.

We are also very supportive of the policies that cover other aspects of our remit; groundwater and contaminated land, biodiversity, and water resources/quality. We are pleased to see that the Water Framework Directive (WFD) has now been referenced in policy, as well as the River Basin Management Plans.
We strongly support the second section of Policy 12, on water efficiency measures, and would be prepared to support your Authority in examination should the requirement for these higher standards come under scrutiny. The Local Plan highlights that in the evidence base available to you, the area is shown to fall within an area of ‘scarce’ water resources. Even if this were not the case, the National Planning Policy Framework (NPPF), and your Part 2 Local Plan are both seeking to deliver highly sustainable development which is more resilient to climate change; it could be argued that reducing the burden on existing water resources is a very effective way of achieving this, and with studies showing that it comes at a cost of approximately £9 per dwelling to implement, it’s unlikely to affect viability of schemes.

In conclusion, we are very supportive of the Local Plan and the evidence base that has been carried out to support it, in so far as our remit is concerned. Unless anything changes, we are unlikely to request any attendance at future examination hearings; none the less, please do let us know if you would like us to attend any sessions in support of your Authority.

Yours faithfully

Mr Rob Millbank
Planning Specialist

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