



## **Durham Bird Club**

Registered Charity No 515101

Rose Cottage  
Old Quarrington  
Durham  
DH6 5NN

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Tel 07397862833

Durham City Neighbourhood Planning Forum  
The Miners' Hall  
Redhills,  
DURHAM  
DH1 4BD

Dear Sir

### **DURHAM CITY NEIGHBOURHOOD PLAN**

I refer to the draft Neighbourhood Plan. On behalf of the Club, I support the general thrust of this Plan in its support for biodiversity but would like to make the following suggestions

#### **Policy S1 – Sustainable Development requirements**

In point 3, you mention the protection of biodiversity. Can I suggest that this should also include the enhancement of biodiversity – I suggest this is consistent with paragraph 109 of the NPPF. “Enhancement” is mentioned in points 7 and 8 so there is precedent in the same policy for this.

#### **Policy S2 – further Sustainable Development requirements**

Point 6 (SUDS) is fully supported as these can also benefit wildlife particularly some water birds

#### **Policy G1 – Green Infrastructure**

Again the Bird Club supports the principles of this Policy and welcomes proposals which will protect and enhance habitats and so provide space for wildlife. As a point of detail, Policy G1.2 mentions bird boxes. The Club is now seeking to promote a little more than this and ask for development to include, where possible, nesting opportunities within the fabric of the building and structures such as swift towers. These will enable birds such as swallows and martins to nest. I believe that, particularly in the work place, bringing nature in like

this has benefits for well-being and performance as outlined in the reports of the Natural Capital Committee.

As far as protecting biodiversity etc is concerned, the Club fully supports Policy G1.5 to prevent habitats becoming isolated. Further, we represent that it is vital for new development to consider the enhancement of biodiversity as mentioned above.

The principle of Policy G1.7 to refuse permission where a habitat is lost is also welcomed. In respect of “offsetting” in certain cases, we note the word “acceptable” in point 1. This is critical – if a habitat is lost, any replacement must be of the same type that is likely to attract similar species to it. There is no point in replacing a riverside habitat suitable for, say, kingfisher with a habitat that is suitable only for garden birds.

Clearly this will also be relevant in respect of Policy G1.9, development alongside the river bank. The river bank is of course a sensitive habitat and we are unsure of the extent of this proposed policy but do represent that these habitat issues are important,

Yours faithfully

R Cowen

Richard Cowen