

Clerk, City of Durham Parish Council
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Clayport Library
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Durham
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28th June 2019

Dear Sirs

Consultation Response to the Durham City Neighbourhood Plan Pre-Submissions Consultation Draft

Thank you for the further opportunity to provide a consultation response to the Durham City Neighbourhood Plan Pre-Submissions Draft Plan.

We previously provided a consultation response to the first draft of the plan in 2017 and took positive note of a range of issues identified within the plan particularly including the emphasis of sustainable development, management of natural resources and climate change. We welcome your aspirations to support and promote a long term sustainable future for the historic city centre.

As the statutory water and sewerage undertaker we make comments only on issues which we feel are of relevance or have an impact on us and our operational duties.

We understand that this Neighbourhood Plan is coming forward in advance of the County Plan by Durham Council and that policies may need to be reviewed in due course once the County Plan is adopted. The plan appears to have developed and been refined since the previous iteration in 2017.

We support Theme 1 and the associated policies. We welcome recognition of the importance of developing the city to be resilient to flooding, to minimise waste and pollution and to adapt to climate change. We welcome the clear criteria set out relating to "Flood Risk" underneath policy S1 where paragraph 8 clearly states that parts of the Neighbourhood area are "at risk of surface water flooding when heavy rainfall causes flooding from sewers, drains, groundwater and runoff from land, small watercourses and ditches". We trust that this will encourage developers and land users to be mindful of all aspects of flooding and the implications which can arise.

We note that the plan specifically identifies "blue infrastructure" as part of the Green Infrastructure section. We support this important reference, as blue infrastructure consisting of rivers, ponds, streams and other watercourses, is in our opinion equally important in helping to create a high quality environment for healthy living and well-being.

We encourage all policies to adopt the principles of sustainable drainage and water management in order to support climate change, resilience and minimise flood risk. These principles should be applied to the economic development policies particularly for the 2 major strategic allocations of Aykley Heads and Durham Science Park at Mount Joy which total nearly 15 hectares of development opportunity. The same principles should be applied to new housing development within the Neighbourhood area also. In advance of the County Plan being adopted with its County wide Water Management and Water Infrastructure policies these principles should be clearly identified within the Neighbourhood Plan. To this end we note under Policy D6 Building Housing to the Highest Standards a reference to the need to apply this policy in conjunction with Policy S1 which we welcome.

Finally, we take this opportunity to remind you again, in relation to Theme 4: A City With Attractive and Affordable Places to Live, that for any development of three or more dwellings we would encourage early consultation with Northumbrian Water prior to the planning process to ascertain a sustainable drainage strategy for each site, including suitable connection points and discharge rates to the public sewer network where appropriate.

To conclude, in addition to earlier comments made on your previous draft plan we trust that the comments above will assist in taking the Neighbourhood Plan through to adoption and we look forward to seeing the vision implemented. If you have any queries relating to our consultation response please do contact us at planning@nwl.co.uk.

Yours Faithfully

Katherine Dobson
Developer Services