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DURHAM
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Our ref: NA/2009/103652/OT-
03/IS1-L01
Your ref:
Date: 18 December 2017

Dear Ros

Draft Durham City Neighbourhood Plan

Thank you for giving us the opportunity to comment on the above consultation document. Having reviewed the documents submitted, we have the following comments and advice to offer.

Flood Risk

We welcome the acknowledgment of flood risk within the neighbourhood plan area and the environment function set out in the vision and objectives of Theme 1. A city with a sustainable future.

Further to this we support Policy S1 to promote resilience to climate change including avoidance of sites in the flood plain. However for clarity I would advise that point 5 of policy S1 could be re-worded to the following: *resilience to climate change including avoidance of sites in flood zones 2 and 3*

This would support sustainability objective 13 of the SA and the vision and objectives of Theme 1. A city with a sustainable future.

Site allocation D1.3

I would recommend that design and layout of site allocation D1.3 Former Bernard Gilpin Society is carried out in a way to locate residential properties outside of flood zones 2 and 3. We also support the requirement of a detailed site-specific flood risk assessment.

Biodiversity

We consider that there is an opportunity for future development, not only to preserve existing conditions, but to also enhance environment assets such as river corridors and natural habitats and to reduce pollution. We support policies G1: Preserving and Enhancing Green Infrastructure and Policy G2: Designation of Local Green Spaces which recognise the need to safeguard and enhance such



areas. We encourage sustainable flood prevention measures within new development such as SuDs and we recommend that these are designed in a way that provides additional habitat.

Water Quality

Although the consultation document makes reference to issues such as flooding, green infrastructure, green corridors and biodiversity, we would support greater references to water quality. In particular, we would welcome references to blue infrastructure and the importance of water for people and the environment. Blue infrastructure is a subset of green infrastructure and included rivers, ponds, streams, wetlands and their riparian margins. Rivers, lakes, coastal and ground waters are an important resource for people, the environment and supporting industry, wildlife, tourism and recreation.

We would welcome the inclusion of objectives in relation to The Water Framework Directive (WFD). The WFD is a European Directive that requires all water bodies to achieve good status by 2021. It also aims to prevent deterioration in waterbody status; reduce water pollution; conserve aquatic ecosystems and habitats; reduce the effects of floods and droughts on waterbodies and promote sustainable use of water as a natural resource. We suggest that further detail could be included in the plan regarding the protection of waterbodies from pollution and management of waterbodies so that they reach and maintain a good and sustainable waterbody status. The Northumbria River Basin Management Plan sets out which actions and measures are needed to achieve the objectives of the WFD.

If you have any questions regarding this letter, please do not hesitate to contact me.

Yours Sincerely

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