

Date: 18 December 2017  
Our ref: 230336  
Your ref: Durham Neighbourhood Plan



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Dear Sir/Madam

**Planning consultation:** Consultation Draft Durham City Neighbourhood Plan and SEA  
**Location:** Durham

Thank you for your consultation on the above dated 01 November 2017 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

#### **Durham City Neighbourhood Plan**

Natural England welcomes the inclusion of biodiversity in Policy S1, however, instead of only referring to the protection of biodiversity, we advise adding the enhancement as well, in line with NPPF policies 9 and 109.

We welcome the reference to and policies on green infrastructure. Multi-functional green infrastructure can perform a range of functions including improved flood risk management, provision of accessible green space, climate change adaptation and biodiversity enhancement.

Policy G1.3 states that development proposals that would result in the loss of existing green assets would be refused unless it does not have a significant ecological value. However, it is unclear what is considered significant. In addition, this does not take into account any cumulative impacts, i.e. if several developments are approved that individually do not have a significant impact, but together might. It also seems that if the loss is not significant, no mitigation would be required, which again could have cumulative impacts.

We welcome Policy G1.5 that includes reference to preventing the creation of islands of biodiversity. This is also linked to Policy G1.3, regarding the cumulative impacts of developments, which could cause fragmentation of habitats. Policy G1.6 refers to green corridors, however, it is unclear what is meant by this. There is no map or definition of green corridors included, and it is unclear if this is similar or different to green infrastructure.

Regarding Policy G1.7, it is unclear what is meant by 'serious damage'. It should also follow the mitigation hierarchy (NPPF policy 118) of firstly, avoidance of impacts, secondly mitigation (not just to minimise adverse effects, but to provide enhancement) and lastly, compensation.

The Plan does not identify strategic green infrastructure, but does include the term 'emerald network'. It is unclear how this network differs from green infrastructure and what additional protection or policies on enhancement it carries.

**SEA**

Natural England has no further comments to make on the SEA.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Ellen Bekker on 0208 225 7091 or [ellen.bekker@naturalengland.org.uk](mailto:ellen.bekker@naturalengland.org.uk). For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours faithfully

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