

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

15<sup>th</sup> December 2017

Dear Sirs,

**Consultation Response to the Durham City Neighbourhood Plan – Draft Plan**

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

We are pleased to note that the Durham City Neighbourhood Development Plan Forum have reached this detailed stage in the preparation of the Neighbourhood Plan and are using this opportunity to influence development in the neighbourhood plan area through developing local policies.

We have reviewed the Draft Plan, and we set out below comments which we feel are of relevance or have an impact on us, as the statutory water and sewerage undertaker.

Firstly we strongly support that sustainable development is promoted throughout the Draft Plan, which reflects the principles contained within the National Planning Policy Framework. We welcome the aspiration to contribute to a long-term sustainable future for Durham City.

Furthermore, we welcome Policy S1 - Sustainable Development Requirements of All Development and Re-development Sites. We particularly support Point 4 of this policy, whereby the Neighbourhood Plan promotes the prudent and efficient use of natural resources, particularly in the context of water efficiency and conservation.

In addition, we welcome point 5 of Policy S1, which refers to resilience to climate change. We are pleased to note the inclusion of a point that recognises climate change is a crucial element that requires consideration. The justification highlights "proactive strategies are needed to mitigate and adapt to climate change, taking full account of flood risk, coastal change and water supply and demand considerations". Identifying and mitigating flood risk will help ensure new developments are sustainable, particularly in light of predicted changes in weather patterns as a result of climate change

We also support Policy S2 - Sustainable Development Requirements of All New Building Developments Including Renovations and Extensions. We particularly support point 5 that wishes to prevent any negative effects, either directly or indirectly, on the quality of the water environment, and where possible lead to an improvement of the water environment. Furthermore we are pleased to welcome point 6 which aims to utilise a sustainable drainage approach through promoting the use of Sustainable Urban Drainage System (SUDS). Such systems can provide multiple benefits in addition to their primary role in flood risk management. Additional benefits include the potential for improvements to water quality, amenity and biodiversity in the local area. We welcome that the Neighbourhood Plan encourages the use of SuDS on new developments and consider that this will promote sustainable water management in the neighbourhood plan area.

Within commentary surrounding green infrastructure, we believe that there is the opportunity for further reference to be made to sustainable drainage and its potential to be an integral part of green infrastructure. This would enable green infrastructure to provide further benefits in the form of improved water quality and reduced flood risk, whilst continuing to deliver the additional benefits that are more prominent within the supporting text of this section, such as amenity value and biodiversity enhancement.

We recognise that the Neighbourhood Plan identifies a number of sites for economic and residential development. 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, we congratulate the Forum on the production of policies that promote sustainable development in the Durham City Neighbourhood Plan area. We hope that our comments are useful and we look forward to the progression of the Neighbourhood Plan towards submission and adoption. Should you have any queries or wish to discuss our response further, please do not hesitate to contact me on 0191 4196767 or at [laura.kennedy@nwl.co.uk](mailto:laura.kennedy@nwl.co.uk).

Yours faithfully,

**Laura Kennedy**

Developer Services  
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