

Steve Petch
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21st September 2016

Dear Sirs,

Consultation Response to the Darlington Local Plan Draft Sustainability Appraisal Scoping Report

Thank you for the opportunity to provide a consultation response to the Darlington Local Plan Draft Sustainability Appraisal Scoping Report, hereafter referred to as the Scoping Report. We have reviewed the Scoping Report in detail and we set out comments below on topics which we feel are of relevance or have an impact on us, as the statutory water and sewerage undertaker.

We recognise that flood risk in the Borough has been identified as a sustainability issue in the Scoping Report, and we welcome that the Council has included flood risk as a key issue and that the likely impact of climate change is also recognised. We would like to take this opportunity to highlight that flood risk from all sources should be considered in the assessment of the impact of new developments, including fluvial, surface water and sewer flooding.

We have reviewed the proposed sustainability objectives and strongly support the decision making criteria identified with regard to sustainable water management and flood risk. Having said this, we would suggest that the criteria for Objective 2, referring to climate change resilience, should also include a sustainable approach to water management. We recognise that these elements are included as part of Objective 4, however we consider that it may be useful to reflect the links between each element as part of a thorough sustainability appraisal. We would also suggest that the decision making criteria for Objective 4, to avoid and reduce flood risk, may benefit from the inclusion of the hierarchy of preference for the disposal of surface water, such as that contained within Revised Part H of the Building Regulations 2010. We consider that this addition would add clarity to the approach required when planning new developments.

Upon reviewing the compatibility of sustainability objectives, we note that paragraph 5.5 suggests that costs associated with the most sustainable outcomes on matters such as flood risk mitigation may impact upon the viability of a scheme to the point at which it would become unviable. We suggest that sustainable solutions do not necessarily exceed the costs of traditional solutions, and furthermore that the broad scope of wider benefits associated with such solutions can in fact result in a scheme that is sustainable and addresses many outcomes simultaneously. We suggest that any sustainability appraisal should properly take account of the wider, additional benefits associated with sustainable approaches.

In a similar vein, we would question the stated incompatibility between Objectives 4 and 10, and suggest that the reduction of flood risk need not preclude ambitious, sustainable levels of economic growth, or vice versa. Economic development can offer opportunities to include

sustainable water management from an early stage, and can result in betterment in terms of flood risk where flows are separated from the sewerage network, or attenuated in sustainable drainage features before being released into the sewerage network in a controlled manner. We recommend that the potential for sustainable water management is considered at each stage of planning future economic growth so that the relevant objectives can maximise the opportunities present and avoid incompatibility.

We trust that these comments are useful to you in the further development of the Sustainability Appraisal and welcome future opportunities for consultation and involvement as they arise. Should you wish to discuss our response further, please do not hesitate to contact me at laura.kennedy@nwl.co.uk, or on 0191 4196767.

Yours faithfully,

Laura Kennedy

New Development – Planning Team
Northumbrian Water