Local Nature Recovery Plan, Draft Consultation Response

The Trust is grateful for the chance to respond to this consultation on the plan, as summarised below.

> "The LNRS will be made of up of two components, a local habitat map and a written "statement of biodiversity priorities". The written part of the LNRS will summarise the current state of nature in the strategy area, set priorities for nature's recovery and identify the practical actions for achieving those priorities. At the heart of each LNRS is the local habitat map. Each map will identify areas recognised for their existing importance for nature, and crucially, areas that could become important for nature recovery and expand or join-up existing areas of habitat so that they are more robust and better connected.
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> The LNRS will provide measures and targets for priority habitats and species.
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> The LNRS will highlight opportunities where nature recovery activities may have the most impact at scale across the landscape but will also promote nature in urban and peri-urban environments.
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> The LNRS will influence planning policy and guide how and where we plan for new development.
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> The LNRS will inform private sector contributions from 'Biodiversity Net Gain' by highlighting strategic areas for delivery."

Introduction

The Trust warmly welcomes this initiative. The work and expertise of the Trust have been concerned with celebrating, enhancing and helping protect the historical built environment of Durham City and its surrounding area. Its focus is primarily on issues of "heritage" and public amenity, but this is increasingly intersecting with questions of the environment in a more strictly ecological sense in, for instance, the recent successful campaign against proposals for destructive relief roads.

The Trust does have a reservation about possible interpretations of the final aim of the LNRS as listed above. The strict priority for "Biodiversity Net Gain" is understood to be enhancement of biodiversity at the primary development site, with the enhancement of sites elsewhere being very much a fall-back option. The requirement for BNG in Durham should not become laxly exploited as enabling a convenient general pot of funds and "biodiversity units" for spending elsewhere, at the expense of the primary site. We also assume that the welcome LNRS scheme is in addition to BNG, given the advice from Natural England that a BNG rate at 10% will be insufficient to halt biodiversity decline. The national ecologists' body (CIEEM) reported on February 7: "the Government's own Impact Assessment acknowledges that 10% BNG may not go beyond 'no net loss'. [1]And Tony Juniper, Chair of Natural England, told the Environmental Audit Committee [on January 24] that BNG is very

[1] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/839610/net-gain-ia.pdf

welcome but will really only help us to stand still, acknowledging that biodiversity is complex and that we are still losing habitats outside of development."[2]

The Trust supports all measures to increase the level of professional ecological support within the Council, recognising that there are serious questions about the capacity of local government adequately to administer and, especially, to monitor BNG over a 30 year target period, and also given some mixed results to date in its administration. [3]

The Trust appreciates being able to make a consultation response in more detail than that allowed in the limited online form for public use.[4] Ecologists in the DCC will obviously be aware of limitations in such an exercise, but consideration of measures to support insect and invertebrate populations generally did seem an especial lack, these being the food source of many of the more popularly valued species. The Trust would generally support continuing DCC efforts to enhance the biodiversity value of road verges, roundabouts etc, through measures such as restricting grass cutting. Would a local campaign about enhancing gardens for insect life be worthwhile?

General Initiatives

The Trust is currently in active support of two general local initiatives highly relevant to the LNRS.

1 *Invasive alien plant species*. Over the past few years the Trust has supported, publicised and been engaged with the *Wear Rivers Trust* in its very ambitious project to remove invasive alien plant species from the whole catchment area of the River Wear, especially Japanese Knotweed, Himalayan Balsam and Giant Hogweed. However, the resources of the WRT are limited and areas of wild green space around Durham City are already completely overrun with Himalayan Balsam. Stands of Giant Hogweed and Japanese Knotweed are a common sight along the riverbanks. Areas badly overrun with balsam include Pelaw Wood, the area around the former DLI Museum, including the newly celebrated Beacon Hill, the northern edge of the woodland at the back of County Hall, and Hopper's Wood east of the railway line. Spread further by flooding it is even sprouting this year from the drainage grids along the side of the new Business School building near the Sands.

Initiatives in the now common form of a one-off community action "balsam bash" are never going to be adequate, given that large amounts of viable seed remain in the soil, repeating the infestation in subsequent years. Annual attention to the balsam for some years on a large scale would be needed, whereas at present even a voluntary community-action type "bash" on DCC land is made impossible by official concerns about health and safety.

In sum, any proposals to improve the biodiversity of these and other green areas in and about the City would surely have to prioritise dealing with destructively invasive species *as a precondition for most other measures.*

2 *An enhanced green corridor north of the City*. Another relevant local initiative warmly supported by the Trust is the plan being developed by the National Trust, with DCC support, to enhance the green corridor north of the City along the river valley from the area of Crook Hall up to Finchale Priory. Eric

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[2] https://committees.parliament.uk/oralevidence/14167/pdf/ See also https://cieem.net/new-briefing-says-10-percent-bng-not-enough/

[3] https://conbio.onlinelibrary.wiley.com/doi/10.1111/cobi.14198

[4] https://survey123.arcgis.com/share/b9d6b94e787048bcaf452d62002ad664

Wilton, a regional manager for the NT, presented some initial proposals to the Trust in December 2022. His talk can be found on the Trust's You Tube channel.[5]

Specific Sites

In addition to these general initiatives, Trustees suggest areas in and around the City that seem to present opportunities for enhancement in ways that support biodiversity.

The Trust support would support work to examine for their biodiversity potential all the areas designated in the relevant Durham City Neighbourhood Plan policies (Policy G2: Designation of Local Green Spaces; Policy G3: Creation of the Emerald Network; Policy G4: Enhancing the Beneficial Use of the Green Belt) and in the "Landscape and Natural Environmental Sites" listed in the Neighbourhood Plan for Durham City Parish (Key sites in Appendix D, Table D1, with a comprehensive list in Durham City Neighbourhood Planning Forum (2018): Assessment of open spaces in Our Neighbourhood)[6], as well as areas beyond the boundaries of the City Parish, for instance Kepier Woods, Brasside Lakes (a SSSI, noted for waterfowl) and the recently planted extension to Frankland Woods to the immediate east of the Lakes, the valley of the Browney and the woods at Bearpark, Maiden Castle and Old Durham, as well as the significant scattering of local nature reserves in the area to the north of Durham, Pity Me Carrs, Low Newton Junction, Cater House Colliery and Witton Dene. To the south beyond the City Parish boundaries, we would note Croxdale Wood, Shincliffe Wood, Butterby Oxbow (another SSI, again noted for waterfowl).

Of these sites, Kepier Woods and the adjoining area of the new Frankland Wood form a sizeable mixed area that might prove especially promising in the proposed green corridor already mentioned. Pity Me Carrs has significant areas of water, often oddly bereft of birds, and might be borne in mind if there are projects further to improve the area for waterfowl, though it is in an urban context. The banks of the Wear on both sides from Kepier Hospital up to Frankland Park are currently relatively devoid of significant trees for a stretch of more than a kilometre. A valuable wildlife corridor seems latent here.

Durham Riverbanks. The Trust very strongly recommends that officers engaged in the LNRS be aware of Martin Robert's survey of the rich history of the riverbanks around Durham's historic peninsula. His detailed talk to the Trust on this subject is available on our You Tube Channel. [7]

Of particular relevance to the LNRS exercise would be those sizeable areas of thin scrubby wood, often overgrown with ivy, that now dominate the area along the river at the back of the Bailey colleges between Kingsgate and Prebends bridges. Likewise, an area of scrubby woods below South Street towards the river seems one place were tree-felling might also have amenity value, restoring historical views of the peninsular, leaving a space that could be replanted in ways more favourable to biodiversity (though Martin Roberts's talk does highlight a valuable beech tree there about 1 hour ten minutes into the video). Replanting of some of the traditional orchards might suggest itself, with fruit trees also having the amenity advantage of not blocking some long views, being of lesser height than many other tree species. The recently restored orchard at Old Durham Gardens might be a model in this respect.

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[5] https://www.youtube.com/watch?v=7mVi3h5WoSg&t=6s

[6] https://npf.durhamcity.org.uk/wp-content/uploads/2020/09/Open-Spaces-Assessment-Final.pdf

[7] https://www.youtube.com/watch?v=g2gS_7-s3AM&t=4012s

Emerald Network. Of particular relevance to LNRS in the text of the Neighbourhood Plan is a proposal for an "Emerald Network" linking the various wildlife sites in the City area by public rights of way and, more importantly for biodiversity, linking them ecologically so as to counteract "the fragmentation of wildlife habitat within the City," and also to improve wildlife corridors to further sites such as in the Deerness Valley. Moorhouse Wood and Borehole Woods near Littleburn were not listed as part of the network, being inaccessible to the public, but linking them would reduce habitat fragmentation.

1 *Swallows, martins, swifts.* The riverbanks are a notable habitat for *sand martins*, especially the built banks of Framwellgate Waterside. Might this be enhanced by provision of more nesting spaces? The tall built fronts along the river might suggest themselves as being enhanced as nesting sites for swallows, house martins and swifts, especially perhaps the front of Riverwalk as it greens over. The proposed redeveloped frontage at Prince Bishops might offer a similar opportunity.

One recent news item could relate to the massive housebuilding programmes on the City's horizon. Mandatory swift bricks in new housing have been debated in House of Lords, according to a report for the ecologists' body CIEEM: "Although a seemingly small change, the inclusion of swift bricks, and other inbuilt cavities into new developments as well as incentives to retroactively insert them into existing buildings can make a huge difference for biodiversity, and only help to grow the connection between people and the nature on their doorsteps."[8]

2 *Aykley Heads.* This area of central Durham has become greatly improved for wildlife over the last decade or so, with the emergence of stands of alder and birch trees. For birds, it seems especially popular for summer visitors (whitethroats, various warblers). However, the small ponds established at the bottom of the site along the line of the railway line have been drying out over the years, and might be restored, as a site for insect larvae etc (dragonfly species seem a less common sight nowadays). Partridges also used to be a common site.

3 *Observatory Hill*. The Neighbourhood Plan also floats a proposal to restore the rare flora lost to agricultural encroachment on Observatory Hill, an historic area of Durham City with iconic views of the World Heritage Site (as noted in the WHS Management Plan). It is included in the Seven Hills Walking Trail. It is an important site for the amenity of local residents and visitors, e.g. footpath access from the housing and college developments in the area down towards the City centre and the University, walking and associated leisure pursuits, viewing the WHS. It is owned by Durham Cathedral and comprises two areas – the private grounds of the Durham Cathedral School Foundation, and 4 fields tenanted by a farmer. The largest field is flanked on one side by a Potters Bank. These fields are designated as a Local Green Space in the Durham City Neighbourhood Plan. Additionally, there is also a flat field at the top of the hill on which the Observatory and Observatory House sit. This field and the Observatory are owned by Durham University. Observatory House is in private hands. The fields are spanned by official, unofficial, and permissive footpaths. Historical evidence suggests these fields have probably been mainly pasture since medieval times. Between 2001 and 2022 Observatory Hill was left as fallow rough pasture (semi-improved grassland). During this period common grasses, clover, buttercups and orchids thrived. The overgrown flowering and fruiting hedgerows between the fields appear to be havens for birdlife. In 2022 the large field was ploughed and planted with a wild bird seed mix (B9 Winter Bird Food) as part of the farmer's

[8] https://cieem.net/mandatory-swift-bricks-in-new-homes-debated-in-house-of-lords/?utm_source=GDPR+CIEEM+List&utm_campaign=c746b5e546-CIEEM+eNews+-+2023.09.1919%2F9%2F23+9%3A49+AM&utm_medium=email&utm_term=0_6b23f028b5-c746b5e546-148748685

Countryside Stewardship Agreement with Natural England. Patches of brassicas, linseed and quinoa emerged, with some patches of the previous wild plants still surviving. Previous biodiversity records do not seem to exist and it is not known what records the farmer is keeping for the wild bird seed mix growth. Observatory Hill is a prime site for enhancing appropriate nature resources with maintenance of the views to the WHS, and with public footpath access through the site and a public viewing area. This could be achieved through identification as a BNG site and by other actions by the owner and local organisations and residents.

4. *Small measures with cumulative impact.* While recognising the LNRS exercise works on a slightly larger scale, the Trust supports many small-scale measures possible through tweaking DCC actions and with some community engagement: planting trees and wildflower seed mixes on roundabouts; minimising the amount of grass cutting of road edges; stopping using herbicides to keep down weeds along footpaths, pavements etc; better management of hedgerows (not the slashing at inappropriate times of the year); more tree/hedge/shrub planting in small spaces; implementing Policy G1 in the Neighbourhood Plan that suggests the following for small development sites:

> para 4.91 Small sites […] face practical constraints on both the retention of green assets when designing the development and in the provision of compensatory (or additional) green assets. Trees or hedgerows around the perimeter of a site might be practicable to retain for example, whereas a tree or group of trees in the centre of a site could prevent the development unless they were removed. As well as compensatory (or additional) green assets in the form of small trees and small landscaped garden areas or flowerbeds, other alternatives could be used, e.g. green roofs, green walls, water features, bat or bird boxes and roosting sites.

As a last point under this heading, developers and land owners such as DCC can have the option of designating suitable open space areas of land as town and village greens. This could also create opportunities for interventions to improve biodiversity.

Amenity Value and Biodiversity Value

It seems understandable that the LNRS exercise stresses the links between the enhancement of biodiversity for life in general and human amenity in particular (such as beauty and psychic health). However, is this strategy in danger of downplaying what are actually strong areas of conflict between these evaluative categories, and even risking entrenchment of the destructive fallacy that the natural world is of value solely as a human resource of some sort? Of especial concern here are problems with dogs and the overpopulation of roe deer.

To take dogs first, might more be done in the Durham City area to ensure responsible dog-walking, especially for the protection of ground nesting bird species in spring and summer? For instance, the only areas of central Durham currently designated officially as “open access” land, where use of a short lead is compulsory in the bird nesting season, are Flass Vale, The Sands, and the small area of substitute commons established recently at Aykely Heads . However, given the lack of appropriate public notices, almost all people walking dogs there will not know this. Might other areas in the City also be designated as “open access”?

The sizeable population of roe deer in the City area is another instance of the clash between biodiversity and amenity values. We understand that deer are now recognised nationally as often an ecological pest, though the public love to see them. We note that the large extension to Frankland Wood planted in 2022 necessitated a deer-proof fence of well over a kilometre in circumference, at

what must have been considerable expense. Are further measures in discussion to meet this intractable clash of biodiversity and amenity values?

Sycamore trees in the Durham City may instantiate the same conflict, holding sometimes a very significant amenity value but with conflicting views on their ecological value (the now famous case on Hadrian's Wall obviously comes to mind). We hope that full appreciation is given to sycamores around the City that form a valuable aesthetic or screening function, as opposed to their simply being treated ecologically as arboreal weeds. If sizeable areas of sycamore are decided to be replaced, might this process be staggered when possible, so that replacement native species have had time to establish and make their mark before the remaining sycamores are felled?

Finally, as already touched on in relation to South Street, the existence of large and mature trees can mean the loss of views within the City and to the World Heritage Site. There is a need for expert management of these trees so that views can be maintained or reinstated without significant loss of the ecological value of the trees.