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Conserving County Durham's Natural Environment Consultation

Trustees welcome the proposed Local Nature Recovery Strategy (LNRS) as a document whose guidance is to be part of the local planning process, setting out the priorities for enhancing biodiversity, improving knowledge of the existing environmental conditions, and mapping out the most valuable areas in the County. This exercise will highlight preferences for future funding and help describe strategic sites and measures that could benefit from use of off-site Biodiversity Net Gain units (in cases where such net gain cannot be achieved at the primary development site).

The Trust warmly welcomed recognition of some features of Durham City in the section on urban nature in the report on earlier feedback (“Durham City benefits from the River Wear flowing through it and otters can be seen on the weirs in the centre of the city. Badgers can also be seen in the city, with setts in churchyards and next to allotments and CCTV occasionally picks them up walking through the marketplace at night. Durham Cathedral supports a significant colony of pipistrelle bats and peregrine falcons can be seen flying around the towers and have previously nested there. The Cathedral also supports swifts, with nest boxes fitted in the central tower a few years ago to encourage the species to breed” (39)).

These points support the Trust’s wish to highlight the importance of small-scale interventions in urban contexts. We would like to forward two areas of mild concern about the proposed LNRS relating to Durham City and its immediate environs.

1 Actual Funding and Implementation.

Government guidance on LNRS in England reads: “There is no requirement that any specific proposed action must be carried out. Instead, the proposals are intended to guide where the public, private and voluntary sectors focus their nature recovery efforts for greater collective impact.

<https://www.gov.uk/government/publications/local-nature-recovery-strategies/local-nature-recovery-strategies>

Knowing what to do, and where, is vital, but not the same as actually doing it. Trustees acknowledge that the LNRS is primarily an exercise in understanding, in mapping, and in setting priorities. It will surely be more effective in proportion to the specific detail in which aims in the LNRS are

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incorporated into revised Neighbourhood and County Plans. The government requirement to review local nature recovery strategies “every 3 to 10 years” will have most force if local planning documents are committed clearly to a specific number.

2 The risk of relegating local nature enhancements.

The stress on nature recovery in “strategic” terms, as in other recent legislation, could risk being at the expense of localised measures, downgrading the small-scale but cumulatively vital measures which improve biodiversity in predominately urban settings—roadside verges, gardens, hedges, small ponds etc.

We understand that the LNRS would relate to a strategic significance multiplier in the metric used to calculate biodiversity net gain for a new development (<https://www.local.gov.uk/pas/environment/biodiversity-net-gain-bng-local-planning-authorities/bng-library/lnrs-strategic>). In other words, some sites and measures identified in the LNRS will occasion enhanced offsite BNG units/credits. While offsite BNG units are meant to apply only in cases where biodiversity enhancement cannot be met at the primary development site, there is a risk that the LNRS could provide an incentive for possible local measures in Durham City to be downplayed in favour of incentivised measures elsewhere.

“Priorities and Measures”

Trustees warmly support the list of priorities for recovery of nature in County Durham.

The first subsection of the list, “Overarching Priorities and Measure,” names interventions, such as protecting Local Wildlife Sites and encouraging “nature-friendly farming,” which are broadly preconditions for the more specific aims listed later, such as the recovery of threatened species. We would urge the inclusion of a further item in this leading section, namely the aim to control, limit and even eradicate invasive non-native species. This is also a precondition for other desiderata.

The aim to “Control invasive species” is listed later in the subsection on Running Waters and Wetlands. However, invasive plants such as Himalayan balsam, and Japanese Knotweed are not limited to water-dominated habitats. The balsam in particular is spreading quickly in areas of the city and its removal would be a precondition for full nature recovery and enhancement there.

Although native, roe deer have become an ecologically damaging and invasive species in the Durham area. Deer are now recognised nationally as often an ecological pest that hinder the growth of new trees, though the public mainly 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 problem?

“The Interactive Local Habitat Map”

With exception of material relating to veteran trees, and local areas of ancient woodland, the habitats map is less directly of interest to the mainly urban focus of the Trust. (<https://eric-ne.maps.arcgis.com/apps/instant/basic/index.html?appid=03f0b31a6b264ecfa4a7df8babbc86f0>) The

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map follows DEFRA guidance on being “simple and uncluttered” by including only existing designated local wildlife sites, “areas of irreplaceable habitat” and “other areas identified by the Secretary of State as being of particular importance” (Paragraph 22, “Local nature recovery strategy statutory guidance”).

“Comment on potential gaps using the Local Habitat Map”

To use the interactive map to home in on the Durham City area under the category of “Urban environment” is to find only one possibility currently highlighted, that of “accessible wildlife habitats being created” in the sizeable space between the east end of Gilesgate and the A1. There are surely far more options. We found it strange that the local River Wear is not highlighted more in the map as a specific habitat, seeming to be covered explicitly there only in the link about mammals (on dealing with mink).

Nature recovery in a primarily urban area such as Durham City is primarily a matter of small-scale measures and interventions, in gardens, along road-side verges, hedgerows, open green spaces, small copses etc. Given the increasingly recognised importance of urban spaces for wildlife such small scale interventions need full support, and Trustees welcomed the recognition of the “urban” in the summary of feedback to the LNRS. Trustees accordingly urge that the priorities highlighted by the LNRS are given due prominence in forthcoming versions of neighbourhood plans in particular so that corresponding possible appropriate measures for enhancing biodiversity can be highlighted at the very local level. Our first response to this consultation in November 2024 made various suggestions. Measures could include enhancing the sizeable landscape around Observatory Hill (“rough grassland”), the creation of wildlife corridors such as tree planting along the river banks to form an arboreal corridor between the Sands and Kepier Woods, the preservation and enhancement of Lower Mountjoy near the Hallgarth Street roundabout and upward towards High Wood, and so on.

A striking strategic omission from the habitats map is Brasside Ponds, SSSI, a sizeable area of water popular with wildfowl and with small islands and promontories that offer protective nesting sites. Except as being an SSSI, the site receives no habitat designation. The account of feedback on priorities for the LNRS does mention lowland heath, reed, fen and the threatened “willow tit” in relation to this area, though this is not yet apparent in the habitats map. The smaller more northerly lake was once a reserve of Durham Wildlife Trust, valued for of population of the threatened native crayfish. We understand the reserve was discontinued because of concerns about it being directly adjacent to Frankland Prison.

Finally, a significant local initiative that is latently strategic and warmly supported is the plan being developed by the National Trust, with DCC support, to enhance the green corridor north of Durham City along the river valley from the area of Crook Hall up to Finchale Priory. The Durham Corridor scheme is part of “Green Corridors North East,” formed with comparable projects in Gateshead and South Tees and which was this year awarded research funding of 2.9 million pounds from the Arts and Humanities Research Council, with engagement from local universities, the NT, local authorities, and community organisations (24 local partners, the so-called “Changemakers”). The broad aims are: sustainable community access, enhancing biodiversity, and protecting cultural heritage.

Although accounts of the project primarily stress its social benefits, enhancement of biodiversity is always incorporated as a contributor to public benefit. In relation to the LNRS, the scheme thus offers

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a platform in which improvements in biodiversity should find it easier to attract notice and hopefully funding. Possible measures in this area already mentioned by the Trust include fuller recognition of Brasside Lakes, the creation of an arboreal corridor along the Wear linking the Durham City riverbanks with Kepier Wood. The National Trust's own material mentions clearance of the Himalayan balsam.

Yours sincerely

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Celebrating, Protecting and Enhancing the City of Durham