

Extinction Rebellion Durham

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This letter represents the feedback from the environmental group Extinction Rebellion Durham, which we are submitting as part of the Submission Consultation stage of the Durham City Neighbourhood Plan. Extinction Rebellion Durham are a hundreds-strong group of Durham residents, as citizens, students, academics, educators, and professionals, forming the Durham branch of the international movement Extinction Rebellion, which demands social change in accordance with the scientific consensus on climate change. The comments set out in this letter represent the views of those members who responded, formally and informally, following to calls to offer feedback on the Durham City Neighbourhood Plan, from 3 January to 16 February 2020, and are in line with Extinction Rebellion's overarching core principles and values. This demands we act in accordance with the climate and ecological crisis our planet is currently facing, the catastrophic effects of which may spiral out of control if our current dependency on fossil-fuels is not addressed in time. In the words of former UN-Secretary General Ban-Ki Moon: 'this is an emergency, and for emergency situations we need emergency action.'

For this reason we emphatically welcome Durham City Neighbourhood Planning Forum's ambitious and progressive Neighbourhood Plan. We also welcome the Plan's emphasis on community engagement, and its interest in representing the wishes of residents. Most people do want to act against climate change, but systemic factors stand in their way. Extinction Rebellion believes that a vital part of combatting climate change is to empower communities to make important decisions in a way that is fair and deeply democratic.

The Plan states its aim to be 'progressive and imaginative', and we firmly support this intention. We also emphatically support the prominence of sustainability in the plan, and its open-mindedness towards the kind of pioneering ideas that are necessary to radically reduce emissions.

We only find that the Plan does not at times seem designed to ensure that its excellent ideas and intentions will be carried out. It is often not firm enough in protecting our city's assets against those who would profit by their destruction, and frequently falls short of ensuring that developments which do not meet its admirable aims will be disallowed. Throughout this letter we often ask for policies to be 'strengthened' or 'stronger' and we use this term to refer to the need for such clear protections and absolute requirements that would rule out developments not in line with this Plan, and ensure the achievement of its aims.

If these shortcomings are partly because the City Plan is bound under County Planning rules, then we believe this shows that Durham City should be given

increased autonomy over planning decisions. Durham City differs from County Durham in many ways, and there is good justification for adopting a different approach to planning in the City, from higher energy-efficiency standards in buildings, to more ambitious aims for sustainable transport.

While this letter may seem on balance to be critical, this is not our overall intention. Overall we are strongly in favour of this Plan, especially if it were to be strengthened and given more clout. Our letter simply sets out our criticisms and comments of its chapters, themes, and policies only where we have something to add. We strongly back this Plan and would like to see it implemented and given real influence in planning procedures in Durham City.

We hope this Plan will be used in order to ambitiously increase the sustainability and heritage value of Durham City, and to radically reduce the City's emissions.

Finally please note that we would like to be notified regarding Durham County Council's decision under regulation 19 to make the submitted Durham City Neighbourhood Plan part of the development plan for County Durham.

Comments on the Durham City Neighbourhood Plan

Chapter 2 – Background

Challenges

One challenge that we would like to see added here is air pollution and traffic, especially in parts of the City where air quality has been identified as posing a risk to human health (i.e. the A690 from Gilesgate roundabout to Stonebridge; Gilesgate Bank leading to Sunderland Road and Marshall Terrace; New Elvet; Claypath; Framwellgate Peth), as well as along the Bailey, and North Road. This is not always necessarily related to traffic volume, but to behaviours, such as taxi idling, and appropriateness for the location.

Chapter 4: Planning Policies and Proposals for Land Use

Theme 1: A City with a Sustainable Future

4.8 describes the aim for 'developments that meet and balance current needs without limiting or compromising the ability of future generations to meet their needs'. Yet in a rapidly warming world, continuing to allow high carbon infrastructure and activity to proliferate in Durham is, almost by definition, to compromise the livelihood of future generations. Any inaction is already denial.

Policy S1 - Sustainable Development Requirements of all Development and Re-development Sites Including all New Building, Renovations and Extensions

We would urge Durham City Plan to require higher environmental standards than the Durham County Plan. Our suggestions would be that buildings must be at least Outstanding on the BREEAM assessment method, This seems reasonable given that the City has a higher concentration of wealth. Norwich City Council have recently

built award-winning council houses achieving Passivhaus standards (after the Council set up its own housebuilding outfit)—it can be done!

In particular, University buildings must be required to meet the highest environmental standards.

Otherwise we would welcome the policies in S1, providing they are pursued to an extent that is ambitious and far-reaching, with systems for implementation and monitoring. We recognise that perhaps the County Council would need to allow this, and urge the council consider such a move.

Air Quality

We are glad to see that the Plan acknowledges the Air Quality Monitoring Area (AQMA) and Action Plan for those parts of the City where air quality is a risk to human health (i.e. the A690 from Gillesgate roundabout to Stonebridge; Gillesgate Bank (leading to Sunderland Road and Marshall Terrace); New Elvet; Claypath; Framwellgate Peth). In order to address the issues an Air Quality Action Plan was approved in June 2016 (AECOM, 2016).

Would like to suggest this Air Quality Action Plan being reviewed and extended in light of further evidence in recent years, that shows the pervasive damage and negative effects of air pollution on mental and physical health. At the very least, there ought to be a commitment to acting quickly across Durham if government guidelines change in line with this new evidence, to limit air pollution even further. It certainly would not be fair on the residents of Durham City to abandon this Action Plan once a certain set of targets are reached. Air Quality in the city must continually be monitored, and ambitious targets set.

We would like to see a ban on private cars within the WHS area, with the exception of the shuttle bus service and other vehicles gaining a pass for exceptional circumstances. The Bailey is a tight road to walk along, and cars waiting on a hill at the traffic lights create a palpably polluted atmosphere. The current lack of restrictions creates an intensely polluted area, that locals, students, tourists alike are forced to walk through, for the sake of the comfort of a relatively tiny number of individuals. In particular, restrictions ought to apply to the large number of cars that drop off and pick up children at the Cathedral School.

We also suggest creating clean air zones around schools and nurseries, where average maximum pollution levels are required to fall well down below national limits. We would also suggest making schools and nurseries into the sites where air pollution is monitored; monitoring air pollution 150m away gives little guide as to what quality of air children are breathing in as they play.

St Oswald's Primary School and the University Nursery on the Hild Bede College site, are notable examples, since these are currently sited on main roads that experience regular congestion. Options such as tree protection barriers at the very least ought to be explored, and, as mentioned, the air pollution levels at these schools ought to be subject to careful monitoring. The nearest air pollution monitor for the University Nursery is up by the roundabout. As things stand, we risk severely

harming the brains and bodies of the children living in our city, and not enough is being done to protect them.

Theme 2a: A Beautiful and Historic City - Heritage

XR Durham fully and strongly support Objective 2.3, the expansion of the WHS boundary to protect the woodland, which is a key part of the experience of the WHS, both from within the current site and from outside it. Trees tell a story just as much as architecture; trees themselves have a history, and play a role in heritage. If we value our natural environment as well as our built environment, then it is crucial that the trees and flora in the proposed WHS area are not just seen as ‘any old greenery’.

We support all the other objectives in this section, and particularly welcome, in addition to 2.3, objectives 5.4.2, to increase access via the bus service, as this may reduce other traffic. However, we would add a note that while the proposed improved signage (in 5.3) may be an improvement, it ought to like all other developments, this must be in keeping with the natural and historic setting of the riverbanks. Walking along the riverbanks is currently a valued escape into nature in the heart of our city; improved signage must not make the riverbanks feel like an extension of a tourist attraction.

We also particularly agree with 4.48, that it is essential that views of the World Heritage Site are not obstructed by new developments.

On the note of the WHS, we would like to suggest that past failures in sensitive and appropriate development on the WHS site are rectified. In particular, the DLI memorial plaque outside Cosin’s Hall, which we understand did not receive planning permission, ought to be re-situated, once an appropriate place is found and at the right time, and following appropriate consultation. Eye-catching in its incongruity and prominence, and sited just where people tend to stop or dawdle as they recover from the steep walk up Owengate, it is currently the first object of attention for many visitors arriving to Palace Green. Yet it forms a poor introduction to the WHS, the historic interest of which is mainly pre-twentieth century. Confusingly, the memorial also has no connection to the Cosin’s Hall building it sits in front of, and dominates. Indeed it is almost impossible to look from any angle at Cosin’s Hall—one of the most important examples of late-seventeenth century architecture in Durham County and a key part of the world heritage site—while ignoring the visually-eyecatching memorial in front of it. In order not to set a dangerous precedent for non-approved development on the WHS, we would suggest that this incongruous memorial ought to be sensitively relocated; ideally to somewhere where it could then add, rather than detract from, a sense of history.

Policy H3 - Our Neighbourhood Outside the Conservation Areas

We would suggest these areas could additionally include trees, hedgerows, that mitigate effects of air pollution and encourage walking and cycling. We would like to see a firm commitment that *ensures* all green spaces, however small, are preserved and expanded, rather than encroached upon. Tree planting along roads would be

welcome wherever viable, and is important to a number of our members. This might combine with a commitment to increasing the biodiversity of municipal green spaces, and the rewilding of verges wherever practicable.

Policy H4 that encourages bringing back heritage assets into appropriate use, particularly for assets at risk, is also keenly welcomed, but once again we would like to see stronger terms used here. The buildings and assets this policy refers to, both designated and non-designated, play a key part of the charm and historic character of Our Neighbourhood. We would urge that any harm or diminishing of these assets will only be allowed in exceptional circumstances, but this is not stated. In addition, we wonder: could a clause be added to specifically encourage improvements to these assets that will improve energy efficiency without causing harm?

We also wonder if the Parish Council or similar could be supported to pursue the listing of some of heritage assets (or their re-listing to a higher category)? The intention to seek support for this could form part of this policy.

Theme 2b: A Beautiful and Historic City - Green Infrastructure

XR Durham strongly welcome and endorse this theme and its objectives. We would only offer some additional comments and concerns relating to its policies. In general, we would like to see the protections and measures called for under this theme made stronger, more detailed, and binding, and the closure of any loopholes that might enable damage to the City's green infrastructure.

Policy G1 – Protecting and Enhancing Green Infrastructure

This policy states that development ‘must not result in the loss of green assets unless...’—and then proceeds to give three clauses, all of which offer an excuse to developers to diminish green assets. We question these three ‘getout’ clauses, a, b, and c, as follows.

Clause a states ‘...the affected asset does not have a significant recreational, heritage, cultural, ecological, landscape or townscape value’ owns. Yet in a world where 75% of earth's entire land surface has been severely altered by humankind, and wildlife is being decimated, *all* green assets offer either recreational, heritage, cultural, ecological, landscape or townscape value (and most often a combination). We question what is required for the value of this kind to be judged “significant”, and who, in practice, will be doing the judging? We would urge that the Plan does not leave such a loophole.

Clause b states ‘...the affected asset can be demonstrated to be surplus to local requirements and there are alternatives which are capable of serving the needs of the occupants of the development and of the environment’. However we assert that, by definition, no green asset can be ‘surplus to local requirements’. If a local area has an abundance of green assets, then these green assets define its local character, which ought to be conserved. If an area does not have an abundance, then this implies that residents, for example, can have a local green space removed from them, on the basis that there is “another one down the road”. Indeed, who needs five trees lining a road,

when one will do? How far can this principle be taken? We believe it could allow developers to do a great deal of damage.

Clause c states ‘...retention of the existing green asset within the site is not viable or practicable’. But viable or practicable for who and in what situation? We fail to see how a green asset might suddenly become ‘unviable’, unless it is in the way of someone wishing to develop the site, or has not been properly taken into account in the planning of a neighbouring development. Fields, verges, hedgerows, and woodland do not suddenly become ‘not viable or practicable’ on their own; they only become so when they lie in the way of someone profiting from their removal. This is precisely the situation which this Plan ought to rule against, and such a clause renders it almost useless at protecting our green assets. We ask that this clause is removed or substantially revised.

When ‘compensatory green assets’ are referred to, we would also ask that the Plan state more clearly what is considered ‘compensatory’. Ancient and old/established woodland cannot simply be replaced. A leylandii is not an oak tree. The disturbance of habitats cannot be undone. Compensation must take into account character, wildlife, and ability to sequester carbon.

We welcome the proposals to protect and enhance the banks of the River Wear. In particular, regarding the point about access, one of our members notes that it is particularly hard to access the River north of the City, between the Rifle Range Field and Finchale Abbey, on either the East or West bank. This is a beautiful part of the river (sadly threatened by the proposed Relief Road) but might be visited even more, were it more accessible. The West river bank is not unfortunately not open to public access. As for the East bank, there is only one easy way to access this from the city, namely via Rifle Range Field. Unfortunately in summer the cows which graze in this field have been known to be particularly aggressive and cause injury, which is extremely off-putting, not to mention dangerous, and can effectively prevent access for anyone who wishes to walk through this outstandingly beautiful environment. We would like to see this addressed.

Policy G2 – Designation of Green Local Spaces

We strongly support this policy. We are particularly glad to see Observatory Hill listed, a green haven among the increasingly built-up ‘Hill College’ area with a sublime aspect onto the Cathedral (some of our members specified they love running and walking on this hill). Similarly we are particularly pleased to see listed the fields near Potters Bank, the magical Flass Vale and North End allotments, the delightful St Margaret’s allotments, and the named Woodland areas. We would suggest adding Pelaw Wood to this list, as well as the Aykley Heads estate (notwithstanding the perverse desires of the County Council to turn the latter into a business park). We would like to see this policy stated in the firmest possible term, to prevent the edges of these and similar areas being ‘nibbled away’.

Policy G3 – The Emerald Network

XR Durham is delighted to see this innovative proposal, which we believe reflects and protects current use of the green spaces in Durham by runners, walkers, and commuters living in and around the City.

We would only resist the clause (a) that ‘development will be refused, unless this harm ‘can be avoided by locating on an alternative site with less harmful impacts’. This seems a slightly unclear clause, since to request relocation onto another site presumably already involves refusing the original development plan? We hope this will be clarified in such a way that will not leave any loophole for damaging development. In general, we would like to see this Emerald Network given clear protections of the strongest kind, that prevent any damage to its routes and green spaces.

Policy G4 – Enhancing Use of the Green Belt

We welcome this proposal, and again would like to see it developed in more detail, with the purpose of more expressly encouraging development that is genuinely positive for biodiversity and landscape, and which retains the current rural character of these areas. This means amending clauses here so that it does not create any loopholes for developers, or allow built-up amenity so that these areas gain the feel of a park with large areas of tarmac. We would also suggest that that this proposal is amended so that proposals for ‘improving access’ will not, in the hands of developers, translate into encouraging increased use of cars and 4x4s. Instead ‘improving access’ should be restricted to access that coincides with existing walking or public transport routes.

Theme 3: A City with a Diverse and Resilient Economy

XR Durham would like to see proposals in this section that positively encourage an economy that is sustainable and low-carbon at every level, and recognise the role businesses can play in lowering Durham’s emissions. This could include, for example, a scheme involving slightly lower rates for businesses that are actively doing more to lower their emissions or mitigate climate change.

It has also been mentioned by XR Durham members that the City needs to be planned to include more public toilets, and especially accessible toilets. The set in Palace Green are up a hill, and the toilets at Prince Bishops are similarly not at ground level. Another set of accessible toilets and clearer signage to existing toilets would be welcome.

A number of members have mentioned the importance of water fountains to fill water bottles. In other cities, stylish water fountains for refillable bottles have been extremely popular and successful, and helped to reduce plastic waste.

More public recycling bins and recycling schemes for difficult-to-recycle items are also needed. There is almost nowhere in Durham City, for example, to recycle soft plastic bags, which are widely recycled but cannot be placed in the normal recycling bin. We would like to see proposals that support local businesses to offer such services that allow local people to recycle more, and waste less.

Theme 4: A City with Attractive and Affordable Places to Live

Policy D6

XR Durham ask that in light of the climate emergency, more attention is given here to ensure higher requirements for truly low or zero emission buildings. Phrases such as ‘improvement’ of energy efficiency and ‘reduction’ of CO2 emissions are rather general, and risk being meaningless. We would like to see specific environmental standards adopted as minimum, as stated above in relation to Theme 1. In particular, the highest possible environmental standards should be demanded from the University as they develop new sites.

Theme 5: A City with a Modern and Sustainable Transport Infrastructure

XR Durham keenly endorse this Theme. In particular we strongly support, as stated here:

- the need to keep motor traffic flowing freely must not continue to take precedence over the needs of other users
- making improvements to the pedestrian networks a high priority
- improving crossings at major junctions to help walking reach its full potential
- the need for improved, later-running bus routes, and a completely free park and ride
- reduction of free parking at major employment sites

In addition we would like to see:

- segregated cycle lanes, uninterrupted by car parking spaces, providing clear routes into Durham City from surrounding areas, and especially in places where pavements are narrow;
- the introduction of electric/hybrid buses as a priority
- additional training of bus drivers, taxi drivers, and council vehicle drivers to switch off their engines during waits. An idling car produces emissions at twice the rate of a moving car, and produces enough exhaust emissions to fill 150 balloons a minute. Yet bus drivers on North Road, for example, often wait with engines running at the stop outside British Heart Foundation Furniture Store for minutes at a time, which is unnecessary with modern engines. Taxi drivers also widely idle their engines for long periods of time along North Road, and at other taxi ranks.
- increased powers given to City traffic wardens to fine idling vehicles in accordance with the law. Currently there is no way of forcing drivers not to idle their engines in the City.
- policies to prevent high emission areas around all schools and nurseries at drop-off times (such as car-free or low-emission zones)

Policy T1: Sustainable Transport Accessibility and Design

We strongly support this policy. We would like to see it go further, and with more clarity and detail, and stronger terms that will ensure its enforcement in practice.

In terms of good cycling routes, members have noted there is a particular need for safe and direct routes into Durham from the area around and beyond Neville's Cross, that are separated from Neville's Cross Bank/A690. This is currently a congested road, which puts people off from commuting along this route by walking; hence they drive instead, and add to the problem. Those who do walk experience high levels of pollution. The pavement is close to the road and children in buggies are therefore particularly close to car exhausts.

Policy T2: Residential Car Parking

We welcome this policy in its entirety and urge its adoption without being watered down. We would also like it to be even stronger, such that it is clear that new development proposals without measures to actively discourage the use of private cars will be turned down. We would like to see this policy's 'supported if' turned into an 'if and only if'. We would like to see the 'may' in clause c, become a 'must'.

Offering residents short-term renewable membership of parking and charging schemes and collective car-parks, rather than permanent ownership of spaces directly by their houses, should be a requisite of any new housebuilding in Durham City. We would like to see this policy specifically rule out individual driveway parking outside homes as well as garages, and to specify that any developments so designed will be turned down.

Chapter 5: MONITORING THE PLAN

We welcome this chapter, and would like to see more detail, but we accept that, as stated 5.4, this is in progress.

Thank you for reading our comments, which we hope will be given proper consideration. Please do not hesitate to get in touch if you would like to discuss anything further.

Yours faithfully,



Extinction Rebellion Durham
(724 members and rising)