



City
Gardens

Draft City of London Biodiversity Action Plan 2021-2026 Consultation Statement

Consultation on the Draft City of London Biodiversity Action Plan 2021-2026 was subject to a consultation process that took place from Tuesday 3rd May until Monday 7th June 2021.

The consultation was promoted through:

- The Biodiversity Action Plan Partnership Group
- A social media campaign
- City of London website
- City AM, City Matters, London Post and Horticulture Week
- Notice boards in City Gardens Sites
- The consultation documents were available in hard copy at libraries.

An online form was developed and which respondent were asked to complete.

The form was divided into ten sections, these largely reflected the structure of the biodiversity action plan:

1. About You
2. Biodiversity in the Square Mile and Beyond
3. Target species
4. Biodiversity Action Plan Themes
5. Action Plan 1: Open space and habitat management
6. Action Plan 2: The built environment
7. Action Plan 3: Education and community engagement
8. Action Plan 4: Data collection, surveys and monitoring
9. Green infrastructure and biodiversity in the Square Mile

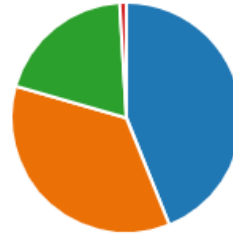
For sections 3-9 that related directly to the biodiversity action plan questions were asked to gauge levels of support of the draft document and each had an open text field for further comments.

NB. Changes that have been incorporated into the final draft are underlined in the text below.

1. Do you:

[More Details](#)

● Live in the City of London	47
● Work in the City of London	38
● Visit the City of London	21
● None of the above	1



2. What is the first part of your postcode? e.g. EC2Y



Comment/ Analysis

The consultation resulted in 83 responses online and 1 response as a word document. 44% of respondents live in the city, 36% work in the city and 20% are visitors. The map above shows the locations of the respondents.

Biodiversity in the Square Mile and beyond

3. I am concerned about the state of nature in the Square Mile

[More Details](#)[Insights](#)

Strongly agree	49
Agree	23
Neutral	6
Disagree	3
Strongly disagree	1



4. I am concerned about the state of nature in the UK

[More Details](#)

Strongly agree	60
Agree	13
Neutral	7
Disagree	1
Strongly disagree	1

**Comment/ Analysis**

Respondents are concerned about the state of nature, with 88% agreeing or strongly agreeing to the statement "I am concerned about the state of nature in the Square Mile" and 89% to the statement "I am concerned about the state of nature in the UK"

Target species

In consultation with the City of London Biodiversity Action Plan Partnership Group, the following species have been selected as 'target species'. These are species found within the Square Mile, take into consideration local, regional and national priorities and should be considered during development and conservation:

- House Sparrow
- Black Redstart
- Swift
- Peregrine Falcon
- Bats
- Wild bees
- Stag Beetle

Protected Species and/or Priority Species records in the City of London are listed in Appendix 2 of the draft Biodiversity Action Plan.

5. Do you feel this list of target species is:

[More Details](#)

[Insights](#)

● Too extensive	6
● About right	33
● Should be extended	37
● Do not know	6



6. Which, if any, other species would you like to be considered a target species?



Comment/ Analysis

The response to the list of Target Species was split. 47% responded that the list was either “about right” (40%) or was “too extensive” (7%) with 45% responding that it “should be extended”.

The aim of the selected target species is to identify flagship species to consider during development and conservation in the Square Mile and are based on recommendations

from our ecological audit that looked at data collected within the Square Mile. It should be remembered that improvements made for the target species cascade into improvements for other species and does not negate the fact that all protected and priority species, such as are listed on the London Priority Species List, should be considered in the planning process and during projects.

We consider that a focused list of target species helps to ensure that benefits are delivered. However as a result of the consultation response it is considered that a commitment to review the target species halfway through this BAP in 2023 will be a new action.

When asked what other species would respondents like considered for target species; 48% of 37 responses received indicated they wanted to see more bird species as target species and 29% of comments received indicated they would like to see more invertebrates including insects and pollinators as target species. Earthworms, were also mentioned and a new action to research and establish an approach to monitoring earthworms as part of Action Plan 4, as these are a good indicator of soil health and condition.

Section 4

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Biodiversity Action Plan - themes

The Biodiversity Action Plan is divided into four themes which are supported by a set of action plans:

- Open Space and habitat management
Aim: to protect and enhance habitats and species in the City.
- The built environment
Aim: to improve green infrastructure in the built environment.
- Education and community engagement
Aim: to promote a greater understanding of the City's biodiversity.
- Data collection, surveys and monitoring
Aim: to improve monitoring and data on biodiversity in the City.

Action Plans have been developed for each theme to help achieve these aims.

7. Do you agree with the themes that have been chosen?

[More Details](#)

[Insights](#)

● Agree they are right	58
● Think others should be consid...	15
● Don't know	7

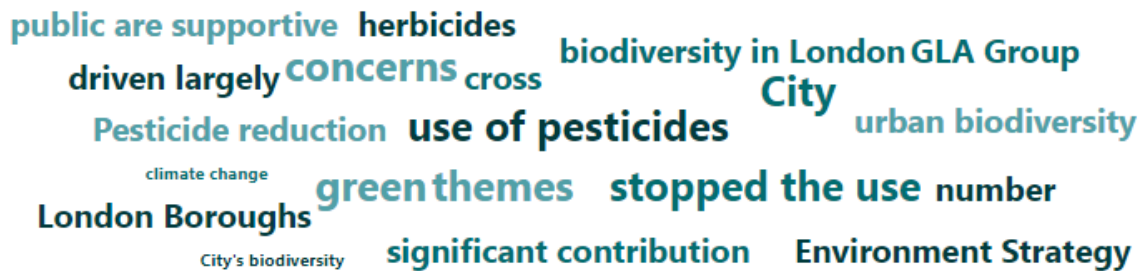


Comment/ Analysis

There was a strong level of support for the themes with 73% responding “They are about right”, with 19% responding “others should be considered”.

8. What other themes would you like to be considered?

5 respondents (19%) answered **use of pesticides** for this question.



Comment/ Analysis

In the 24 responses to the open question, there was a strong focus on the reduction or stopping completely the use pesticides in the responses. Please see below on the response to this.

Other responses asked for themes on wellbeing, air quality and climate change, and whilst it is accepted that these are subjects that are intrinsically linked with biodiversity they are covered by other City of London Corporation strategies and policies for which the BAP supports.

A change that will be adopted is the suggestion to change the aim for the built environment to : "Aim: to improve infrastructure for biodiversity in the built environment."

To therefore include measures such as nest bricks, bat boxes, and bee bricks, which are important for urban wildlife but not "green".

Other issues raised will be considered when delivering action plan 1.

Action Plan 1: Open space and habitat management

Aim: to protect and enhance habitats and species in the City.

Enable land owned and managed by both the City Corporation and privately, to be maintained and enhanced for biodiversity.

Key actions:

- Adopt the recommendations of the 2016 review of Sites of Importance for Nature Conservation (SINCs) in the City of London.
- Schedule and secure funding for a future SINC Review.
- Assess the potential of the Barbican Wildlife Garden to qualify as a Local Nature Reserve (LNR) and consider if that is an appropriate designation for this garden.
- Commission and secure funding for an ecologist to produce management plans for all City Corporation managed SINC sites.
- Carry out a baseline survey and commission and adopt a black redstart species action plan.
- Set up of a multi-departmental working group to develop guidance on managing historic walls, memorials and structures for biodiversity.

9. Do you consider these actions:

[More Details](#)

[Insights](#)

● Do not go far enough	18
● Generally agree	54
● Go too far	5
● Don't know	4



10. Please provide any comments other on the key actions:



Comment/ Analysis

There was a strong level of support for this action plan with 67% responding “Generally agree”, with 22% responding “don’t go far enough”.

Again, the use of pesticides was raised in the comments section, see below for the response on this matter.

Of the 26 respondents over a quarter mentioned in some form the need to focus on private landowners. It is felt that a number of the actions will improve this, and this will be a focus for the partnership group going forward.

Action Plan 2: The built environment

Aim: to improve green infrastructure in the built environment

Enable biodiversity to be incorporated into the built environment to enhance and connect green spaces.

Key actions:

- Develop an ecology toolkit and biodiversity checklist for projects and public realm schemes.
- Environment Bill - including assessment of duties as a local planning authority and biodiversity net gain.
- Develop sustainability planning guidance that includes green infrastructure, biodiversity and climate resilience.
- Review and amend the existing planning application validation process.

11. Do you consider these actions:

[More Details](#)

[Insights](#)

● Do not go far enough	24
● Generally agree	50
● Go too far	4
● Don't know	3



12. Please provide any comments other on the key actions:

Comment/ Analysis

There was generally a strong level of support for this action plan with 62% responding “Generally agree”, with 30% responding “don’t go far enough”.

Again, the use of pesticides was raised in the comments section, see below for the response on this matter.

There were 29 comments on this action point and apart from pesticides there were no clear themes apart from pesticide use. The comments section raised a number of interesting points, many of which will be considered when delivering action plan 2.

Action Plan 3: Education and community engagement

Aim: to promote a greater understanding of the City's biodiversity

Identify and encourage best practice amongst private landowners and managers as well as develop the skills and knowledge of residents, City workers, school children and students through events, activities and volunteering opportunities.

Key actions:

- Provide advice, guidance and training to support the BAP both for City Corporation employees and the wider City community including residents, businesses, visitors, schools, colleges, developers and land managers.
- Support resident and community groups that contribute to local and national species recording and monitoring initiatives.
- Develop guidance on supporting pollinators in the built environment by establishing a working group.
- Promote and disseminate guidance for the London Invasive Species Initiative (LISI) species to raise awareness of these species and how they should be managed.

13. Do you consider these actions:

[More Details](#)

● Do not go far enough	9
● Generally agree	63
● Go too far	6
● Don't know	3



14. Please provide any comments on the key actions:



Comment/ Analysis

There was generally a strong level of support for this action plan with 78% responding “Generally agree”, with 11% responding “don’t go far enough”.

Again, the use of pesticides was raised in the comments section, see below for the response on this matter.

There were 13 comments on this action point and apart from pesticides there were no clear themes apart from pesticides. There were however some good ideas on improving education and community engagement that will be considered by the BAP partnership.

Section 8

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Action Plan 4: Data collection, surveys and monitoring

Aim: to improve monitoring and data on biodiversity in the City.


Establish a structured approach to surveying and monitoring of sites to inform ongoing management decisions and identify future areas of priority. This includes professional ecology surveys, citizen science opportunities and records collected by voluntary groups and individuals.





Key actions:

- Maintain, improve, promote and utilise the information and services available via the Greenspace Information for Greater London Service Level Agreement.
- Develop and implement a planning condition which requires developers of relevant schemes to collect and submit relevant Biological data of their site to the City of London Planning Authority to improve data monitoring and assessment on biodiversity trends in the City.
- Produce a biological recording strategy.
- Identify funding to carry out a black redstart and bat baseline survey to guide future management interventions and enhancements.
- Undertake below ground mapping to identify opportunities and barriers for establishing new green infrastructure and sustainable drainage systems (SuDS) within the public realm.

15. Do you consider these actions:

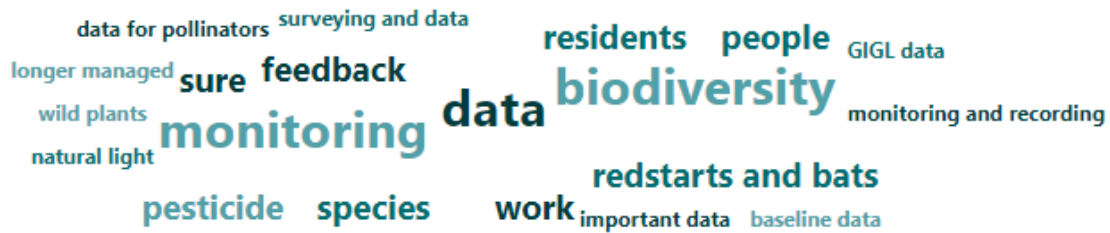
[More Details](#)

 Insights

	Do not go far enough	11
	Generally agree	59
	Go too far	8
	Don't know	2



16. Please provide any comments on the key actions:



Comment/ Analysis

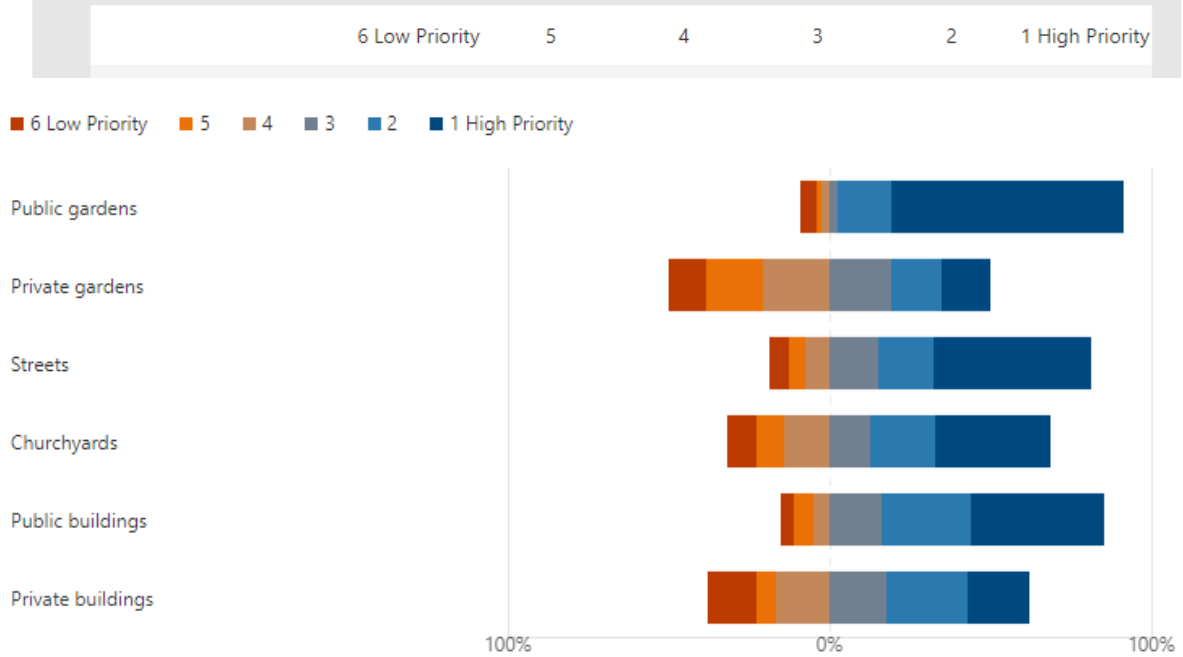
There was generally a strong level of support for this action plan with 74% responding “Generally agree”, with 14% responding “don’t go far enough”.

Again, the use of pesticides was raised in the comments section, see below for the response on this matter.

There were 17 comments on this action point and apart from pesticides there were no clear themes. The action to produce a biological recording strategy will take into consideration the comments to focus on the monitoring of pollinators including wild bees and moths. This will also support the development of guidance for pollinators in the built environment and how enhancements can be monitored.

Green infrastructure and biodiversity in the Square Mile

17. Can you list in priority order the locations below, that you feel would provide the most benefit from a focused approach to improving green infrastructure and biodiversity in the Square Mile: (1 = high priority, 6 = low priority)



Comment/ Analysis

The way this question was constructed ensure that responders had to respond in priority order, resulting in most responders giving more than one location the same priority and in a number of cases, responders gave every location the same priority score which has distorted the results. However, it is clear that from the above that respondents considered that Public Gardens could benefit the most from a focused approach. Followed in order by Streets, Public buildings, Churchyards, Private buildings and then private gardens. This is interesting as it is at odds with the open responses to Action Plan 2 which highlighted a need to focus on privately owned land and sites.

18. Do you have any other comments on the draft Biodiversity Action Plan?



Comment/ Analysis

29 participants responded to this open question. Some were supportive:

“A welcome and thorough document, with just a greater emphasis required on integrated measures due to their benefits regarding lifetime, low maintenance, success rate, temperature regulation with future climate change in mind, and aesthetic integration.”

“It is a very good initiative, thank you!”

“I think it's wonderful that this is being done! As a personal perspective, I think it's always good to remember that all wildlife ultimately depends on plants, at the bottom of the food chain, and the important role of 'weeds' in this structure.”

Some were critical:

“It wouldn't surprise me if these good intentions get overridden by some development or other work the City preferred to support.”

“Please concentrate on essential services and cleaning gardens and streets of rubbish”

“Waste of taxpayers' money.”

And many urged stronger actions and more commitment:

“Hopefully the BAP will be taken seriously and proper resources given for both the preparation of SINC management plans but also for monitoring these and the action plans.”

“Time is running out for this planet. Be bold an implement asap”

“This does not feel that it goes far enough and fast enough. The emptying of the City during lockdown gives a wonderful opportunity to reset the dial on how the streets and green spaces could be promoted even further and be truly ambitious for a green city.”

Response to Pesticides

Throughout the responses there was a clear focus on reducing or stopping pesticide use. The following are good examples of concerns.

“The Mayors of London's Environment Strategy contains a call for all in the GLA Group to reduce the use of pesticides. A number of London Boroughs have already reduced or stopped the use of pesticides and many other Boroughs are interested. This has been driven largely by concerns about urban biodiversity in London and is something the public are supportive of. Pesticide reduction is a cross-cutting theme that should be incorporated within the four existing themes. I believe that, in order to support biodiversity, ending the use of pesticides (including herbicides) would make a significant contribution.”

“A complete stop to the use of pesticides”

“Other than habitat, pesticide use is a key challenge for biodiversity, and must be addressed, including in the private sector. The Mayor of London is pushing for a pesticide free London and some boroughs are already pesticide free or going that way. Here in Lambeth, Parks stopped glyphosate use 2-3 years ago, Estates, last Summer, and August will be the last spraying of on the streets, with some streets choosing to opt out and the residents hand weeding. My own street has opted out for 3 years now -the various lockdowns over the past year have been a brilliant time to feel and see the benefits of a chemical free environment with an abundance of biodiversity!”

“In regard to guidance on managing historic walls etc ensuring that non-chemical weed and pest control measures are used should be a key part of the strategy. Similarly, management of all green spaces should be done without the use of pesticides. Creating a stakeholder forum for all land managers within the area under the control of the City of London to look specifically at pesticide free land management should be included in the plan.”

Firstly, it is important to state the current position in relation to the use of pesticides in the City. The City has taken great steps in reducing its use of Glyphosate, which receives much focus as it is the most commonly used herbicide. Street cleansing have stopped using Glyphosate and all other herbicides completely. Usage by the City Gardens team has reduced to less than five litres a year in total and we will seek to reduce this further. As part of the City Gardens Management Plan, which is due to be reviewed in 2022, the City Gardens team will undertake to review the use of all pesticides in its gardens with the BAP Partnership Group. Alternatives will be assessed, and their benefits and disadvantages evaluated.

Regarding the management of historic walls, pesticide use will also be reviewed, however this provides some challenges when removing woody plants such as Buddleia the choice is between the careful use of chemicals or the digging out of root systems and the unavoidable resulting damage to listed structures. Options will nonetheless be looked at and evaluated.

Appendix A - Full list of responses to all the open question

Comment received	Theme of response	City Corporation response
Question 8 - What other themes would you like to be considered?		
Wellbeing Aim: to create opportunities and spaces that allow people's wellbeing to benefit from the City's biodiversity.	Wellbeing	Access to nature to support wellbeing should be considered as part of the review and update of the Open Space Strategy SPD.
Pollution and air quality	Air quality	Pollution and air quality are specifically covered in the City Corporation's Air Quality Strategy 2019-2024.
I'd like to see another one - to create more green space within the City - at ground level (not just roofs)	Open space	Protection and creation of green space addressed in the draft City Plan 2036 and Open Space Strategy SPD.
There is a lot of focus on the diversity of fauna. Is it not also important to focus on greater diversity of flora in response to climate change as well as the needs of wildlife	Flora	A number of the actions aim to increase understanding of flora in the Square Mile. Actions such as the development of a ecology toolkit and biodiversity checklist, sustainability planning guidance and SINC management plans should focus on protecting and increasing flora diversity for a variety of benefits.
Adjust: The built environment should be: "Aim: to improve infrastructure for biodiversity in the built environment." To therefore include measures such as nest bricks, bat boxes, and bee bricks, which are important for urban wildlife but not "green".	Theme	Suggestion adopted. The wording better reflects the aim of this action plan to improvement infrastructure for biodiversity which includes but is not limited to improving green infrastructure.
Engagement with other city councils to promote methods of increasing and protecting biodiversity.	Engagement	Agreed that it is important to engage and share learning of ways of increasing and protecting biodiversity with neighbouring boroughs and Greater London.

Comment received	Theme of response	City Corporation response
Clean up the City in areas that have grown wild because of lack of maintenance - make them truly "green"	Maintenance	This is a subjective point of view and for some people wild areas are greener due to having a higher biodiversity value. We aim to meet the dual objectives of a more biodiverse environment and high quality amenity spaces.
Introduce more "wild" gardens.	Open space	The opportunity to expand or enhance areas of existing sites to improve the biodiversity value will be considered as part of the SINC Management Plans.
<p>No mention of population explosion of squirrels and pigeons infesting the Barbican. These wreck window box plants and need culling. The pigeons disturb sleep at night. Squirrels on the first floor above podium on terrace blocks run along fire escape route. I caught one in my flat. They eat eggs and destroy trees. About time CoL did something please. BEO takes no action. Pigeons worse while peregrines nest in [redacted] , so hawk cannot visit.</p> <p>There is also a plague of mosquitoes from July until autumn. It's impossible to leave windows open in the evening or get bitten. Money wasted on this project should be directed to cleansing gardens and open spaces of rubbish left behind by visitors each weekend.</p>	Squirrels and pigeons	This is primarily a pest control issue which should be considered as biodiversity enhancements are developed.

Comment received	Theme of response	City Corporation response
Reducing litter which has a visual impact but also impacts on wildlife.	Litter	Comment noted.
More trees! More green enclaves - rather than 'rooftop gardens'!	Trees; greening	Comment noted. Draft City Plan 2036, Open Space Strategy SPD and Tree Strategy SPD address provision of ground level open space and tree planting.
More feedback from the community.	Engagement	Noted that engagement with the community is vital for the success of the BAP with the support of the Partnership Group and development of Working Groups.
Consider preserving habitat instead of destroying for new developments and then trying to build back	Development	Preserving existing habitat is currently a considered during the planning process.
General greening of streetscapes. More on impact of light pollution.	Development; greening; lighting	The draft City Plan 2036 supports the greening of the public realm. The City of London Lighting Strategy contributes towards limiting light pollution.
Chosen themes look good. What about including climate change and climate change mitigation.	Climate change	Comment noted and it is recognised that biodiversity and climate change are interconnected. Climate change will be considered throughout the delivery of the action. The Climate Action Strategy 2020-2027 addresses these areas directly.
Creating more pockets for wildlife in the City by converting paved areas into green areas	Greening	The draft City Plan 2036 supports the greening of the public realm to support biodiversity such as the creation of green corridors and biodiversity links.

Comment received	Theme of response	City Corporation response
<p>In order to support biodiversity ending the use of pesticides (including herbicides) would make a significant contribution. The Mayors of London's Environment Strategy contains a call for all in the GLA Group to reduce the use of pesticides. A number of London Boroughs have already reduced or stopped the use of pesticides and many other Boroughs are interested. This has been driven largely by concerns about urban biodiversity in London and is something the public are supportive of. Pesticide reduction is a cross-cutting theme that should be incorporated within the four existing themes. Information is available at https://www.pan-uk.org/pesticide-free/</p>	Pesticides	Please refer to full statement in 'Appendix 1 - City of London Biodiversity Action Plan 2021-2026 Consultation Statement'.
<p>In order to support biodiversity ending the use of pesticides (including herbicides) would make a significant contribution. The Mayors of London's Environment Strategy contains a call for all in the GLA Group to reduce the use of pesticides. A number of London Boroughs have already reduced or stopped the use of pesticides and many other Boroughs are interested. This has been driven largely by concerns about urban biodiversity in London and is something the public are supportive of. Pesticide reduction is a cross-cutting theme that should be incorporated within the four existing themes.</p>	Pesticides	Please refer to full statement in 'Appendix 1 - City of London Biodiversity Action Plan 2021-2026 Consultation Statement'.
A complete stop to the use of pesticides	Pesticides	Please refer to full statement in 'Appendix 1 - City of London Biodiversity Action Plan 2021-2026 Consultation Statement'.

Comment received	Theme of response	City Corporation response
It would be hood to include information extinction of species.	Species	Species decline and biodiversity crisis referred to in the BAP.
I think broadly these are right, but and look forward to how you propose to expand these. I know where I live in Lambeth there are concerns about residents wanting parks and estates to look perfect and mown, but this is obviously where education must come in, firstly, and importantly, with Council officials who definitely prefer the easy route, unfortunately!	Engagement; maintenance	It is important to engagement and communicate with the community when changes to the management of a site are proposed.
Roof top gardens and growing plants on roofs of buildings	Greening; green roofs	The Biodiversity Action Plan promotes the value biodiverse roofs. The draft City Plan 2036 supports the installation of biodiverse extensive or intensive green roofs.
Pesticides - The Mayors of London's Environment Strategy contains a call for all in the GLA Group to reduce the use of pesticides. A number of London Boroughs have already reduced or stopped the use of pesticides and many other Boroughs are interested. This has been driven largely by concerns about urban biodiversity in London and is something the public are supportive of. Pesticide reduction is a cross-cutting theme that should be incorporated within the four existing themes. I believe that, in order to support biodiversity, ending the use of pesticides (including herbicides) would make a significant contribution.	Pesticides	Please refer to full statement in 'Appendix 1 - City of London Biodiversity Action Plan 2021-2026 Consultation Statement'.

Comment received	Theme of response	City Corporation response
Question 10 - Action Plan 1: Open space and habitat management - Please provide any comments other on the key actions:		
<p>scope is limited. there is more that can be done in open spaces, including adding more green habitats.</p> <p>A lot of the private land is paved and corporate - can this be made more natural/green/welcoming for nature.</p>	Greening; development	The draft City Plan 2036 supports habitat creation to enhance biodiversity.
Actively create new habitats in the City, on rooves, in unused spaces...	Habitats	The draft City Plan 2036 supports the installation of biodiverse extensive or intensive green roofs. The BAP identifies open mosaic habitat and standing open water as target habitats for creation and enhancement.
Plant wildflowers everywhere. Far too many streets in square mile with no trees/plants.	Greening	The draft City Plan 2036 and Tree Strategy SPD support both greening and tree planting.
<p>Create more green spaces in the City, even tiny ones.</p> <p>Talk to companies and corporations about incorporating more plants and wild greens in private spaces as well.</p>	Open spaces; engagement	Both the draft Local Plan 2036 and Open Space Strategy SPD support increasing green infrastructure.
I would like key actions to include kore tree planting and greening programmes on city-owned land	Tree planting; greening	Tree planting is addressed in the Tree Strategy SPD and the Transport Strategy includes the proposal to incorporate more greenery into the City's streets and public spaces.
Too few green areas in general in City of London and no consideration in planning decisions concerning loss of natural light	Greening; Daylight and sunlight	The city is actively trying to increase green infrastructure both in the public and private realm. Loss of light is currently considered during the planning process.

Comment received	Theme of response	City Corporation response
Need to ensure that we bring in more volunteer groups to get their support and engagement e.g. Barbican Horticultural Society, Barbican Residents' Gardens Advisory Group	Engagement	Commented noted and it will be important to involve specific community and volunteer groups to support the BAP as any site specific plans are developed.
Greenspace is being steadily eroded in the City because some of it is privately owned. There should be a complete ban on development on open space. Disturbance is also a major issue for wildlife, and some areas should be human-free.	Open Space	The balance between open space and development is considered during the planning process and we are actively seeking to increase the amount of green infrastructure from development. However sometimes development necessitates an impact on green space.
There are other green spaces (e.g. in the roundel at the Museum of London) and tree lined streets (e.g. just south of Old Street/north of Golden lane/Charterhouse/Barts Sq) which should be protected too	Open space; trees	Green space and tree protection is not specifically covered by the BAP. For trees, the vehicle for this is Tree Protection Order legislation and is covered by the Tree Strategy SPD.
Barbican wild garden should not be nature reserve. It is a residential garden	Barbican; LNR	Comment noted.
Irrespective of LNR status, the Barbican Estate etc SBINC should be extended to include all the green infrastructure in the Barbican as well as the Golden Lane Estate and upgraded to SMINC status	Barbican; SINC	The boundary of existing and proposed SINC will be considered as part of any future SINC review.
Involve construction industry, land owners and large organisations into discussions	Engagement	Comment noted.
Do you need an ecologist to produce management plans?	Ecologist	Ecological expertise will be required to deliver a number of the actions including SINC Management Plans.

Comment received	Theme of response	City Corporation response
Tidy up what you have. Cannot see the point of encouraging wildlife in City of London. This is just the latest bandwagon to occupy inflated corporation employee numbers. Keep the community charge down and help reduce CoL budget in straightened circumstances.	Maintenance; resources	The BAP supports biodiversity in the Square Mile for the benefit of both wildlife and people.
Please protect the Barbican Wildlife Garden! A very special place which is greatly appreciated.	Barbican	Comment noted.
I'd like more communication about the falcons	Comms	Information and existing resources will be shared to raise awareness of target species.
Protocols to prevent chemicals being used in weed management.	Pesticides	Please refer to full statement in 'Appendix 1 - City of London Biodiversity Action Plan 2021-2026 Consultation Statement'.
Feels unambitious given the climate crisis	Climate change	Comment noted.
Would like to see targets set (and met) for increase in numbers of key species	Species; targets	Most species benefit from improvements or increase in suitable habitat for which targets can be set and monitored. The target species have also been selected where specific considerations or interventions will support the species.
As mentioned before to find more areas in the City for wildlife gardens or just trees.	Nature sites; trees	The opportunity to expand or enhance areas of existing sites to improve the biodiversity value will be considered as part of the SINC Management Plans. The draft City Plan 2036 and Tree Strategy SPD supports tree planting.
I would like to have seen something about a review of City gardens management practices such as increasing local composting, eliminating pesticides and herbicides, etc	Pesticides and herbicides	Please refer to full statement in 'Appendix 1 - City of London Biodiversity Action Plan 2021-2026 Consultation Statement'.

Comment received	Theme of response	City Corporation response
<p>In regard to guidance on managing historic walls etc ensuring that non-chemical weed and pest control measures are used should be a key part of the strategy. Similarly management of all green spaces should be done without the use of pesticides. Creating a stakeholder forum for all land managers within the area under the control of the City of London to look specifically at pesticide free land management should be included in the plan.</p>	<p>Pesticides</p>	<p>Please refer to full statement in 'Appendix 1 - City of London Biodiversity Action Plan 2021-2026 Consultation Statement'.</p>
<p>Seems very modest - and leaves me wondering how you can not have already adopted 2016 recommendations as a minimum - don't you need something fit for 2021 and beyond.</p>	<p>Targets</p>	<p>Comment noted.</p>
<p>As institutions across the board we are not doing enough and we are running out of time.</p>	<p>Targets</p>	<p>Comment noted.</p>

Comment received	Theme of response	City Corporation response
<p>Other than habitat, pesticide use is a key challenge for biodiversity, and must be addressed, including in the private sector. The Mayor of London is pushing for a pesticide free London and some boroughs are already pesticide free or going that way. Here in Lambeth, Parks stopped glyphosate use 2-3 years ago, Estates, last Summer, and August will be the last spraying of on the streets, with some streets choosing to opt out and the residents hand weeding. My own street has opted out for 3 years now -the various lockdowns over the past year have been a brilliant time to feel and see the benefits of a chemical free environment with an abundance of biodiversity!</p>	Pesticides	Please refer to full statement in 'Appendix 1 - City of London Biodiversity Action Plan 2021-2026 Consultation Statement'.
Question 12 - Action Plan 2: The built environment - Please provide any comments other on the key actions:		
<p>Toolkit is not enough to ensure green infrastructure is enhanced. can there be a target for the amount of green to be added?</p>	Greening	The draft City Plan 2036 supports greening as part of development which is supported by the Urban Greening Factor.
<p>Again more specific targets relating to tree planting and greening public spaces</p>	Trees; greening	The draft City Plan 2036 and Tree Strategy SPD support both greening and tree planting which the BAP supports.
<p>need more detail of "review and amend the existing planning application process? Please supply</p>	Development	The current planning application process will be reviewed to see how improvements can be made to ensure that biodiversity is better considered by developers and planners during the process.
<p>The greenery on buildings is normally ridiculous, not making up for the increased height of office buildings and often only viewable if flying over in a helicopter</p>	Green roofs	Comment noted.

Comment received	Theme of response	City Corporation response
emphasise use of green roofs for biodiversity rather than recreation	Green roofs	The draft City Plan 2036 supports the installation of biodiverse extensive or intensive green roofs.
Agree it is really important to work with developers to ensure that new buildings and refurbished buildings support the BAP	Engagement; development	Comment noted.
The density of built environment is a real issue in the City. Officer life is on the decline. STOP BUILDING OFFICES	Development	Comment noted.
<ul style="list-style-type: none"> • Develop an ecology toolkit and biodiversity checklist for projects and public realm schemes. - this will just be a tickbox for developers to replace or plant trees/green roof/walls which may not actually increase biodiversity so HABITAT and TREE LOSS should be key drivers for planning decisions 	Development; trees	The ecology toolkit and biodiversity checklist are intended to support City Corporation staff as a tool to for projects and public realm schemes.
Increase firm commitments of new buildings to include green infrastructure in their plans and offset carbon through biodiversity/afforestation schemes outside of the City.	Greening; carbon	The City's Urban Greening Factor which has recently been adopted as part of the Local Plan, which will result in greater green infrastructure. Regarding off setting, we are awaiting the new Environment Bill to give clear steer on biodiversity net gain.
There is consistently a net loss of small green spaces due to infill developments.eg. Mais House being a prime example, and the application by Lewisham Homes to develop on Hillcrest Woods in 2016. Lewisham Planning overrides green space protection consistently as favour is always given to development. Unless green spaces have legal protection, it is all up for grabs for building.	Open space	In relation to the Square Mile, the draft City Plan 2036 supports the protection of existing open and green space.

Comment received	Theme of response	City Corporation response
Clarify that the SPG includes important integrated measures for urban biodiversity that are not in the category of "green", e.g. nest bricks, integrated bat boxes, and bee bricks.	Planning	The draft City Plan 2036 supports that artificial features such as nest boxes should be integrated into the design of development or refurbishment schemes wherever suitable to provide additional habitat for the City's target species. Opportunities for integrated measures to be included in the ecology toolkit and biodiversity checklist.
A full time ecology officer should be appointed to vet and monitor planning applications and there should be a policy to prefer retrofitting to demolition. All green infrastructure should be secured by s106 agreement.	Ecologist; greening; planning	Comment noted.
Focus on the City - forget "climate resilience" that is a national and international level. Money spent on "climate" is money not available for actual green programs of today	Priorities; climate change	The Climate Action Strategy 2020-2027 supports building climate reliance by providing thriving and biodiverse green spaces and urban habitats.
Connecting green spaces int CoL will just encourage more foxes and squirrels. Foxes already run around the Barbican car parks at night. There is no control on this and there should be.	Barbican; foxes; squirrels	Comment noted.
Perhaps more reuse of existing buildings rather than building new & usually oversized buildings.	Development	This is being looked at under both the Climate Action Strategy and Circular Economy work.
There should be a campaign to ensure that all residents in the Barbican plant and maintain their window boxes	residents; greening	Comment noted.
Survey of swift nesting sites, and how to provide more sites near them that more swifts will use. (Needs a few years, as swifts' habit is to first prospect for nearby nesting sites, and then return the following year to actually use them.)	Species	Comment noted.

Comment received	Theme of response	City Corporation response
Feels unambitious	Targets	Comment noted.
Would like to see strong enforcement of the policies.	Enforcement	Comment noted.
I would like to have seen more emphasis using this theme to develop better green corridors through the city	Greening	The draft City Plan 2036 and Open Space Strategy SPD support the provision and creation of green corridors.
Non-chemical weed and pest management should form a core part of the approach to the built environment.	Pesticides	Please refer to full statement in 'Appendix 1 - City of London Biodiversity Action Plan 2021-2026 Consultation Statement'.
In regard to guidance on managing historic walls etc ensuring that non-chemical weed and pest control measures are used should be a key part of the strategy. Similarly management of all green spaces should be done without the use of pesticides. Creating a stakeholder forum for all land managers within the area under the control of the City of London to look specifically at pesticide free land management should be included in the plan.	Pesticides	Please refer to full statement in 'Appendix 1 - City of London Biodiversity Action Plan 2021-2026 Consultation Statement'.
In regard to guidance on managing historic walls etc ensuring that non-chemical weed and pest control measures are used should be a key part of the strategy. Similarly management of all green spaces should be done without the use of pesticides. Creating a stakeholder forum for all land managers within the area under the control of the City of London to look specifically at pesticide free land management should be included in the plan.	Pesticides	Please refer to full statement in 'Appendix 1 - City of London Biodiversity Action Plan 2021-2026 Consultation Statement'.

Comment received	Theme of response	City Corporation response
<p>In regard to guidance on managing historic walls etc ensuring that non-chemical weed and pest control measures are used should be a key part of the strategy. Similarly management of all green spaces should be done without the use of pesticides. Creating a stakeholder forum for all land managers within the area under the control of the City of London to look specifically at pesticide free land management should be included in the plan.</p>	<p>Pesticides</p>	<p>Please refer to full statement in 'Appendix 1 - City of London Biodiversity Action Plan 2021-2026 Consultation Statement'.</p>
<p>Some developers work hard to improve the environment for wildlife and deserve commendation- the London Wall Place development being a good example - however there is no sign this is actually prompted by anything from the Corporation - examples such as the supposed sky garden in 20 Fenchurch St show that anything goes where planning applications come from big corporate entities. Setting some ambitious objectives would be a start.</p>	<p>Planning; development</p>	<p>The draft City Plan 2036 supports the greening of the City through new development opportunities and refurbishments. All development proposals will be required to demonstrate the highest feasible levels of greening consistent with good design and the local context.</p>
<p>many of these measures should be mandatory</p>	<p>Targets</p>	<p>Comment noted.</p>
<p>Biodiversity and trees need as much protection as possible and we need to strengthen our policies around these sorts of things.</p>	<p>Protection</p>	<p>The draft City Plan 2036 and Tree Strategy SPD includes policy for protecting and improving biodiversity and retention of existing trees.</p>
<p>Pesticide use is a key destroyer of biodiversity, and must be addressed. Essential that all with interests taking the above process forward, must embrace a pesticide free approach, be it the Council, corporations or private groups.</p>	<p>Pesticides</p>	<p>Please refer to full statement in 'Appendix 1 - City of London Biodiversity Action Plan 2021-2026 Consultation Statement'.</p>

Comment received	Theme of response	City Corporation response
Assess current environmentally responsible office space and building landlord to adhere to the green infrastructure in the building environment	Greening	Comment noted.
Question 14 - Action Plan 3: Education and community engagement - Please provide any comments other on the key actions:		
Fund community the establishment of community gardens in the city, or lease City of London land for this purpose. Fund schools outreach events on urban biodiversity in City schools.	Funding, schools	Comment noted.
Encourage big businesses in square mile to plant/put plants/wildflowers outside their buildings.	Engagement	Comment noted.
Too many working groups.	Working groups	Comment noted.
Agree - • Support resident and community groups that contribute to local and national species recording and monitoring initiatives. • Develop guidance on supporting pollinators in the built environment by establishing a working group. Rest are going to achieve nothing and a waste of resources	Priorities; resources	Comment noted.
I think setting up a volunteer program with businesses would be affective especially as many corporates give employee volunteer days	Volunteering	Volunteering opportunities to support the BAP will be identified as actions are progressed.

Comment received	Theme of response	City Corporation response
<p>In my opinion, more needs to be done to engage the community.</p> <ul style="list-style-type: none"> - Develop new educational projects aimed at families - residents and visitors - Engage with other CoL departments to coordinate a united strategy to inform other audiences of the value of the City's diversity - Utilise the resources already available by other CoL sections (resident's newsletters, visitors social media, City Information Centre, Libraries, screens...) to channel the relevant messages 	Engagement; communications	A Working Group focusing on communication will be established with the aim of identifying opportunities to engage with City community, raise awareness of the BAP and support biodiversity in the Square Mile.
The elected representatives should receive guidance etc and appoint a biodiversity champion from amongst them.	Members	Comment noted.
Support events for businesses (and encourage volunteer days) and schools.	Engagement	The actions of the BAP support providing advice, guidance and training to the City community.
Plenty of green spaces in suburbs owned by CoL. Adjoining councils have plenty of places if children really need to look at beetles, which I doubt. With all the other pests in Barbican, I can do without extra insects and birds tweeting all night outside bedrooms (as we had for weeks last winter)	Open spaces	The overall response to the consultation demonstrates a strong public desire to increase biodiversity within the Square Mile. Under the Natural Environment & Rural Communities Act 2006 (NERC), as a public authority in England, the City Corporation has a duty to 'in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'

Comment received	Theme of response	City Corporation response
<p>I think this sort of reaching out tends (perhaps with schools as the exception) tends to reach people who are already interested/looking out for opportunities. Incentivising involvement (from employers, a wider range of residents and smaller businesses etc) could make a meaningful impact.</p>	<p>Engagement</p>	<p>Comment noted. A Working Group focusing on communication will be established with the aim of considering how the aims and benefits of the BAP reach the City community.</p>
<p>One of the key existing barriers is the attitudes of both the planning officers and the elected councillors who sit on the planning committee. While the the rhetoric is changing, planning decision continue to be made to the benefit and to deliver economic gain for developers to the detriment of our local environment.</p>	<p>Planning; Members</p>	<p>Comment Noted</p>
<p>Communicating with the public on biodiversity will be key to the successful delivery of the strategy. One key area for communication will be talking about the use of pesticides and how the City of London will reduce and end their use.</p>	<p>Pesticides</p>	<p>Please refer to full statement in 'Appendix 1 - City of London Biodiversity Action Plan 2021-2026 Consultation Statement'.</p>
<p>Again, essential to go pesticide free, failure will jeopardise this process. I think nearly all the public are against the use of pesticides, the rest can be got on board with education. Non chemical methods of control must be used, but also, habitats suitable for species must be promoted which may involve letting areas become more wilder.</p>	<p>Pesticides</p>	<p>Please refer to full statement in 'Appendix 1 - City of London Biodiversity Action Plan 2021-2026 Consultation Statement'.</p>
<p>Question 16 - Action Plan 4: Data collection, surveys and monitoring - Please provide any comments other on the key actions:</p>		

Comment received	Theme of response	City Corporation response
When planning decisions are blocking out more and more natural light, it contributes to greenery and natural habitats not being able to thrive	Daylight and sunlight	The impact of shading produced by developments is currently considered during the planning process. We are looking at how this aspect can be improved whilst we review the planning process in respect to biodiversity.
Who pays for all this work?	Resources	The development of the BAP process has been funded by local risk budgets.
Not sure about focus on redstarts and bats to exclusion of other species. How do residents access the GIGL data? If they can't it is a missed opportunity	Species	No species are excluded, all relevant species should be considered as part of conservation and development, in particular protected and priority species. Target species have been selected where there are specific opportunities to support the species in the Square Mile. Data search reports are available from GiGL for the public and community groups.
Make better use of volunteers - a lot of people would be happy to help with this and it would increase engagement and monitoring	Engagement	Opportunities for volunteers to support engagement and monitoring are important and will be considered as the actions are developed.
<ul style="list-style-type: none"> - Create effective channels to engage with local communities to encourage feedback on biodiversity observations - Create a 'Friends of' or similar to report interesting sightings and create a buzz among those who care and are keen to contribute 	Monitoring; engagement	The action to produce a biological recording strategy will look at opportunities to engage with the community to support species observations. Friends of City Gardens support biodiversity enhancements and surveys.
automate monitoring using sound recordings, cameras, machine learning and IoT technology	Technology	Methods of species monitoring will be considered as part of the action to develop a biological recording strategy.
An ecologist should be employed to support species surveying and data collection.	Ecologist	Ways of ensuring that the City has access to ecological advice and support are being explored.

Comment received	Theme of response	City Corporation response
Perhaps community and volunteer groups could receive funding to assist in monitoring and recording e.g. qualifying for time credits and small grants to buy bat monitors, binoculars etc.	Resources	Funding opportunities for the BAP in general and to support the biological recording strategy will be considered as this action is developed.
Publicise accomplishments and achievements in easy to read materials tailored to business, residents and visitors. People should be aware and proud of the work being undertaken in the Square Mile, and should be advocates for this in other areas.	Engagement	A Working Group focusing on communication will be established with the aim of identifying opportunities to engage with City community to raise awareness of the BAP and support biodiversity in the Square Mile.
This project is a waste of money and ill conceived. I'm sure it will employ many overpaid graduates who tweet their progress to much acclaim. It doesn't improve my environment.	Resources	Comment noted.
Should include an attack on light pollution from offices at night	Lighting	The City of London Lighting Strategy 2018 addresses the need to limit unwanted spill light.
Maybe encourage built-in swift bricks for new developments?	Species; development	Opportunities to directly support target species such as Swifts will be included in the ecology toolkit.
In addition to the black redstart and bat survey proposals, establishing baseline data for pollinators including wild bees, butterflies and moths would provide important data.	Species	The action to develop a biological recording strategy will explore and prioritise where baseline data is required.
Monitor the (likely) increase in insect biodiversity of spaces once they are no longer managed with pesticide products to remove wild plants.	Pesticides	The action to develop a biological recording strategy will identify priorities for monitoring. Please refer to full statement in 'Appendix 1 - City of London Biodiversity Action Plan 2021-2026 Consultation Statement'
Again this looks like baseline effort - this is a bare minimum.	Targets	Comment noted.

Comment received	Theme of response	City Corporation response
Absolutely agree, with good signage with explanations, for example for wilder areas, or no mowing. Working a treat in Lambeth! Feedback of change needs to happen to help promote the changes.	Comms	Comment noted.
Biodiversity can only be protected by replacing the use of herbicides and other pesticides to manage plants and pests with chemical-free alternatives, and creating rich and safe habitats.	Pesticides	Please refer to full statement in 'Appendix 1 - City of London Biodiversity Action Plan 2021-2026 Consultation Statement'.
Question 18 - Do you have any other comments on the draft Biodiversity Action Plan?		
the streets could become green corridors to connect spaces and encourage wildlife. More ambition needed	Greening; targets	The draft City Plan 2036 supports the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors.
Time is running out for this planet 🌍 Be bold and implement asap 🙌🙌🙌🙌	Targets	Comment noted.
It is a very good initiative, thank you!	Comment	Comment noted.
Waste of taxpayers' money.	Resources	Comment noted.
Ever higher buildings overshadowing green areas and private gardens/balconies with window boxes is leading to a reduction in greenery	Daylight and sunlight	The impact of shading produced by developments is currently considered during the planning process. We are looking at how this aspect can be improved whilst we review the planning process in respect to biodiversity.
Is there a clear view of what sorts of plants and wildlife would be best suited to life in the City and how that view might change over time?	Species; climate change	Actions such as the development of an ecological toolkit, sustainability planning guidance and guidance for pollinators in the built environment will provide details of opportunities for wildlife specific to the City.
I hope it is more than window dressing	Comment	Comment noted.
Can't believe all this isn't happening already	Comment	Comment noted.

Comment received	Theme of response	City Corporation response
Glad to see peregrine falcons called out - useful for controlling pigeon numbers too. Their numbers should be expanded.	Species	Comment noted.
Thank you for putting this together and requesting feedback.	Comment	Comment noted.
Biodiverse extensive green roofs (not sedum mats) offer the greatest potential for increasing biodiversity	Green roofs	Comment noted. The draft City Plan 2026 support the installation of biodiverse extensive or intensive green roofs.
A welcome and thorough document, with just a greater emphasis required on integrated measures due to their benefits regarding lifetime, low maintenance, success rate, temperature regulation with future climate change in mind, and aesthetic integration.	Development	Both the Biodiversity Action Plan and draft City Plan 2036 support that artificial features such as nest boxes should be integrated into the design of development or refurbishment schemes.
The Biodiversity Action Plan goes some way to support nature in the Square Mile but the City really need a green infrastructure strategy to guide and prioritise biodiversity and greening interventions to have a real impact.	Policy	Comment noted.
Hopefully the BAP will be taken seriously and proper resources given for both the preparation of SINC management plans but also for monitoring these and the action plans.	SINCs; monitoring; resources	Comment noted.
See above comments. Please concentrate on essential services and cleaning gardens and streets of rubbish	Resources	Comment noted.

Comment received	Theme of response	City Corporation response
<p>Does the City have a light pollution policy? Too many offices remain illuminated & with Tv's left on 24hrs a day, 7 days a week. Could the impending green space on Ben Johnson podium be more carefully thought through? There appeared to be more birds thriving in the old garden that predated the Nigel Dunnet redesign. Could we have a space more dedicated to wildlife, and preferable incorporates anti-skateboarding measures.</p>	<p>Barbican; lighting</p>	<p>Comment noted. The City of London Lighting Strategy includes guidelines to help reduce light spillage and glare from retail and office premises.</p>
<p>The City of London is very polluted with traffic. Maybe the Biodiversity Plan should have a link to the reduction in Pollution plan? The other issue that relates to Biodiversity is rubbish and waste. Some roads and streets are a mess with strewn rubbish and this should be reduced to enable biodiversity to flourish.</p>	<p>Air quality; litter</p>	<p>The City of London Air Quality Strategy 2019-2024 addresses air pollution and the associated benefits of greening. The City of London Transport Strategy supports clean and well-maintained public spaces.</p>
<p>Private gardens and buildings occupy the most amount of space, and therefore need more attention.</p>	<p>Priorities</p>	<p>Comment noted, the built environment and privately managed spaces are a consideration of the Biodiversity Action Plan.</p>
<p>It wouldn't surprise me if these good intentions get overridden by some development or other work the City preferred to support.</p>	<p>Priorities; development</p>	<p>Comment noted.</p>
<p>I think it's wonderful that this is being done! As a personal perspective, I think it's always good to remember that all wildlife ultimately depends on plants, at the bottom of the food chain, and the important role of 'weeds' in this structure.</p>	<p>Species; habitats</p>	<p>Comment noted.</p>

Comment received	Theme of response	City Corporation response
This does not feel that it goes far enough and fast enough. The emptying of the City during lockdown gives a wonderful opportunity to reset the dial on how the streets and green spaces could be promoted even further and be truly ambitious for a green city.	Targets; greening	This policy should not be considered the City's sum ambition towards greening and repurposing the City. The draft City Plan 2036, Climate Action Strategy, Transport Strategy all demonstrate that the City is being ambitious in driving change.
Why has Paternoster square not got any green at all for example?	open space; greening	Comment noted.
I think an effort to make rooftops into diverse gardens and have a bee hive strategy atop buildings across the city to help the rooftop and ground level gardens/parks strong and flourishing.	Green roofs	The draft City Plan 2026 supports the installation of biodiverse extensive or intensive green roofs. The action to develop guidance for pollinators in the built environment will promote opportunities to support wild bees.
Biodiversity can only be protected by ending the use of herbicides to manage plants, and creating rich and safe habitat spaces.	Pesticides	Please refer to full statement in 'Appendix 1 - City of London Biodiversity Action Plan 2021-2026 Consultation Statement'.
Go as far as you possibly can - we need to act ASAP to reverse the climate emergency. Any repurposing of tarmac/road space to green space should be expedited	Greening	Comment noted.
All of these sites must be supported and be a priority. I'm sure that feels overwhelming, but I think with the will power this can happen. Going pesticide free, borough wide, for starters, must be a pivot for this entire process.	Pesticides	Please refer to full statement in 'Appendix 1 - City of London Biodiversity Action Plan 2021-2026 Consultation Statement'.

Comment received	Theme of response	City Corporation response
<p>I hesitate to say it as I am involved with monitoring peregrine falcons in London, but I think this species sometimes receives too much attention, potentially at the expense of species like swifts, which arguably need more assistance right now. The City is only large enough to accommodate 1 or 2 peregrine pairs and many of the newer buildings are less well suited for peregrine nesting, but could potentially be utilised by swifts given the right nesting provisions. I used to hear black redstart on rooftops around the Guildhall but I'm not sure these are still attractive to them if they have had work done on them. There are definitely black redstarts in neighbouring areas (e.g. around the Law Courts) but I have not heard them around the Barbican or Moorgate in recent years. Ditto with sparrows at the Barbican. The Barbican should have massive potential for nesting birds in addition to peregrine falcons.</p>	<p>Species</p>	<p>Comment noted and this an example of how interventions for target species should be approached in different ways. Opportunities for Swifts, Black Redstarts and House Sparrows as target species will be considered as guidance is developed. The action to develop SINC Management Plans will also consider opportunities to support these species.</p>
<p>Biodiversity can only be protected by replacing the use of herbicides and other pesticides to manage plants and pests with chemical-free alternatives, and creating rich and safe habitats</p>	<p>Pesticides</p>	<p>Please refer to full statement in 'Appendix 1 - City of London Biodiversity Action Plan 2021-2026 Consultation Statement'.</p>