



City of London

Biodiversity Action Plan 2021–2026

Progress Review Sept 2024

Biodiversity Action Plan 2021-2026

Mid-Term Progress Report

The Biodiversity Action Plan (BAP) was launched in 2021 with the purpose of providing a strategic focus to ensure species and habitats are understood and considered throughout the decision-making processes in the Square Mile. The BAP provides a framework to ensure all legislative requirements and regional and national targets for protecting, conserving and enhancing biodiversity are met at a local level.

At the half-way point of the action plan, this report aims to review the progress of the BAP actions, comment on achievements made and discuss where focus will be applied moving forward to close out the actions by 2026.

The actions are grouped into 4 key areas:

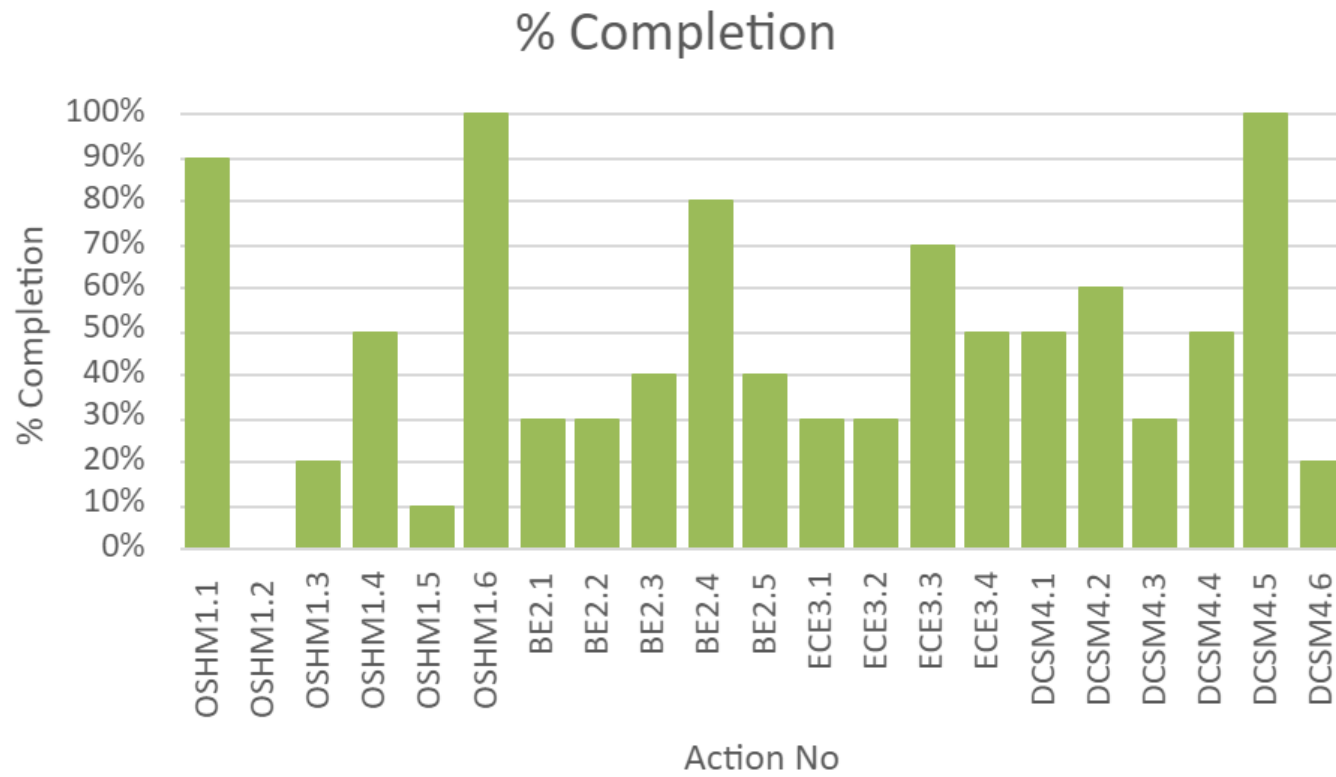
- Open Spaces and Habitat Management
- The Built Environment
- Education and Community Engagement
- Data Collection, Surveys and Monitoring

As shown by Figure 1, good progress has been made across the various actions with the overall completion level of the action plan sitting at 47%. There are 2 items which have been successfully completed and progress has been made on all actions bar one. Appendix 1 provides detail of each action and its current completion status. There are a number of challenges that are ongoing which are causing delays for some of the actions. This includes elements which are outside the control of the BAP action owners such as policy documents being adopted, and London wide legislation being created.

Key focuses moving forward will be:

- Feeding into the Local Nature Recovery Strategy (LNRS) consultation from the GLA to ensure that our target species are featured, and work with them to have aligned species action plans.
- Work to align the BAP more closely with the LNRS so that post completion of the current BAP in 2026 the City Corporation will instead move to create a Local Nature Recovery Plan for the City.
- Continue to progress and develop Sites of Importance for Nature Conservation (SINC) management plans for all the City's SINC and review options to carry out a full SINC review to assess current SINC and potential to propose additional sites.
- Support the implementation of Biodiversity Net Gain (BNG) through the planning process by providing evidence to inform biodiversity gain plans and other opportunities for net gain and nature recovery.
- Continue to drive engagement, awareness and education of the BAP and biodiversity in general both within the City Corporation and with the wider stakeholders of the square mile.

Figure 1: % Completion of the BAP Actions



A large amount of work has been completed to complement and assist in the delivery of the actions for the BAP to continue to support biodiversity thriving within the City. This includes:

Re-vitalisation of the Biodiversity Action Plan Partnership Group: The BAP Partnership Group is a key vehicle which has been established in order to utilise the knowledge and support of the wider city community to progress the BAP actions. This group is made up of biodiversity experts, other CoL colleagues, resident and volunteer groups, businesses within the city and other landowners/managers. The group meets bi-annually to review the BAP progress and to discuss any issues, challenges or opportunities.

The group was established at the initiation of the BAP but has recently been revitalised with working groups set up to have dedicated focus on 3 key areas:

- Communication, Education and Awareness
- Pollinators in the City
- Biological Recording

These working groups are made up of volunteers from the Partnership Group that have a specific interest in one of the three topics and meet every 2 months to progress actions of the BAP related to these topics.

- **The Communication, Education and Awareness group** are focusing on ensuring the right channels of communication are in place for this different stakeholders of the BAP. An internal/external facing SharePoint page has been created to allow for the collaboration of the Partnership Group on documents as well as to house key information documents.
- **The Pollinators in the City group** are focused on creating a guidance document for the land managers and owners within the

city to raise awareness of key pollinators and the “Dos and Don’ts” of how to create thriving habitats for them.

- **The Biological Recording group** are reviewing the many different methodologies of recording currently practiced in the City and plan to create a formalised recording strategy. This will aim to support those that want to make biological recordings in the City whilst also ensuring that as much of this information as possible is fed into Greenspace Information for Greater London (GiGL), our local recording centre, so that there is a full picture of the City’s biodiversity.

Recruitment of a Business Admin Apprentice: A business admin apprentice has been appointed to support with biodiversity related volunteering within the city’s gardens. Their role is to:

- Work with the City Garden’s team to establish potential projects for volunteers to engage with
- Engage and coordinate with Friends of City Gardens and other potential third-party volunteer facilitators to arrange volunteering opportunities
- Manage and respond to corporate enquiries with regards to volunteering.

With this volunteering programme established, The City Corporation can ensure that meaningful volunteering can happen within the Square Mile which supports the advancement of the BAP.

Establishment of The Biodiversity and Nature Recovery Group: A cross-corporation working group focusing on the various responsibilities and roles of the City Corporation relating to Environment Act duties including BNG and consulting on Local Nature Recovery Strategies. The group facilitates collaboration, communication and offers an opportunity to consult on relevant activities.

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Running of the Pollinator Panel: Bought together a diverse range of stakeholders in the field of ecology, conservation and planning to communicate key messages on the challenges and opportunities for urban pollinators. This included support from: Pollinating London Together, Royal Holloway University of London, UrbanBees, Greengage Environmental, and the Inner Temple.

Deployment of AgriSound Monitors: An innovative trial to utilise sensors across the Green Spaces in the City to automate pollinator monitoring. This will not replace in-person monitoring but will hopefully provide a good level of data to demonstrate improvements made to biodiversity where other initiatives have been put in place.

Working with Universities: Imperial College has deployed three Masters students to complete their theses on the value of green roofs and open spaces in the City of London, specifically to study the bio-acoustic activity of bats, bird communities and black redstarts. They carried out 4 weeks of data collection across 16 - 20 sites in the City. They also embedded an independent researcher who carried out a thorough literature review to condense relevant literature.

Increase in Pollinator Friendly Planting: Through the implementation of the Cool Streets and Greening phase 1 - 4 projects, pollinator friendly planting is being incorporated into City Gardens and Public Realm sites. This includes the Replanting for Resilience project which is delivering 14

replanting schemes to increase climate resilience and biodiversity value in existing gardens.

Climate Champions Volunteering: Two activities have taken place in Q1 and Q2 to increase volunteering opportunities for City Corporation employees which also support biodiversity initiatives.

City Nature Challenge: took place in April, endorsed by the Lord Mayor, staff joined the Climate Champions in three City Gardens to record biodiversity. See the results here: [City Nature Challenge 2024: London · iNaturalist United Kingdom](#) / [City of London Bioblitz · iNaturalist United Kingdom](#)

Lunch and Learn presentation for the Big Butterfly Count: delivered to encourage staff from across the City Corporation to get involve in the simple community science project to collect data on the health of butterflies and our environment.

Work to promote GiGL across the organisation: GiGL did a presentation to the GIS Liaison Group to help promote the SLA and also a lunch 'n' learn was hosted for all colleagues to learn more about GiGL and the work they do as part of our SLA.

Input into policy documents: including a policy and process for Biodiversity Net Gain, Sustainability SPD, Draft City Plan 2040 and biodiversity related policies reaching Reg 19 consultation.

Other engagement and education: 3 bat walks and 3 moth trapping events through the year, learning and training sessions the Friends of City Gardens carry out at Bunhill as part of the Rewild London Fund project to support BAP objectives

Conclusion

At the half-way point of the Biodiversity Action Plan there is a lot of positive progress that has been made. The focuses moving forward for the second half of the BAP are:

- To continue to complete the actions of the BAP through the actions and workings of the BAP Partnership Group.
- Continue to raise awareness through the City Corporation, to both the local resident and business communities, and visitors to the city of the importance of biodiversity.
- To work with the GLA in feeding into the wider London LNRS.
- Support the work of colleagues implementing the BNG legislation.

Action Update

Category	Action Number	Action	Update	% Completion
AP1	OSHM1.1	Adopt via the City Plan 2036, the recommendations of the 2016 review of Sites of Importance for Nature Conservation (SINCs) in the City of London.	The recommendations of the 2016 SINC Review are to be adopted by the 2040 City Plan when it is launched (circa July 2025 – the adoption of the new City Plan was delayed beyond the control of the BAP).	90%
	OSHM1.2	Schedule and secure funding for a future SINC review. Identify any proposed new sites, boundary changes or upgrades to be included as part of the review.	Due to the delay in the City Plan 2040's adoption, this action has been put on hold. This will commence once the City Plan is adopted.	0%
	OSHM1.3	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.	This action is ongoing, working with the Barbican Estates Office team to look at sources of funding.	20%
	OSHM1.4	Secure funding and commission for an ecologist to produce SINC management plans for all City Corporation managed SINC sites. Work with landowners and managers to develop management plans for privately owned/managed sites.	The City Corporation instructed a consultant, Greengage, to complete SINC management plans for St Pauls and Cleary Gardens which are complete and in place. A robust and thorough SINC management plan has been created for Nobel Street with the support of the FoCG team and in collaboration with Heritage Estates and the district surveyors team. This will be used as a blueprint for future SINC management plans which will be worked on over the coming years leading up to 2026.	50%
	OSHM1.5	Carry out a baseline survey and commission and adopt a Black Redstart species action plan.	As part of the London Nature Recovery Strategy (LNRS), species action plans are to be developed. It is anticipated that this action will be picked up through this work carried out by the GLA and will ensure we are aligned with our neighbouring boroughs. Monitoring work has however commenced with UCL on a project basis which will be able to feed into this species action plan.	10%

	OSHM1.6	Set up of a multi-departmental working group to develop guidance on managing historic walls, memorials and structures for biodiversity.	The work completed for the Noble Street management plan required the collaboration of heritage estates to agree a mutually beneficial approach to managing habitats that overlap with historic structures/features. The need for the working group is no longer required as the advice and guidance agreed can be applied to all historic walls, memorials and structures across the City. This action is complete.	100%
AP2	BE2.1	Develop an ecology toolkit and biodiversity checklist for the City of London Corporation staff as tool to support projects and public realm schemes.	There has been some work commenced on how this will be brought together. The work being carried out by the BAP Pollinators working group will help contribute to this along with existing resources that need to be consolidated. A key next step is the creation of an intranet page for CoL colleagues to access which is being carried out by the Comms Partnership Group.	30%
	BE2.2	Following the enactment of the Environment Bill, assess how the City Corporation will meet its duties as a local planning authority in respect to aspects of the bill that are covered by amendment to the Town and Country Planning act, such as Biodiversity net gain.	<p>Biodiversity Net Gain (BNG) legislation came into effect in February 24. CoL instructed a third-party report to be generated by Greengage on how the City Corporation should approach BNG. The findings of the report recommend a 3 biodiversity unit/Ha approach to be taken as opposed to the 10% gain stipulated by government due to the densely urban nature of the City. This is being adopted as part of the 2025 City Plan.</p> <p>As for next steps:</p> <ul style="list-style-type: none"> • Greengage has been commissioned to carry out an additional piece of work to establish the best ways to incorporate biodiversity in new developments in the Square Mile • training sessions will be run from September for CoL staff on BNG • monitoring techniques and technologies are being explored in order that we are prepared to enforce this legislation moving forwards. 	30%

	BE2.3	Following the enactment of the Environment Bill, assess how the City Corporation will meet its duties as a local authority and implement strategies that are not covered by amendments to the Town & Planning Act.	Within the City Corporation a corporation wide working group has been established on Nature Recovery and Biodiversity. This group is responsible for ensuring the adequate reporting on Biodiversity Duty along with other requirements for the LNRS. Other elements such as tree felling are being reviewed by our City Gardens team with a number of items that still need review.	40%
	BE2.4	Develop Sustainability Planning guidance encompassing, but not limited to, Green infrastructure, Biodiversity and Climate Resilience to ensure Developers and Planning officers take appropriate steps at pre-planning application and design development stages to meet local policy and national legislation.	The most recent Sustainability Supplementary Planning Document (SPD) has undergone consultation and is under review. This contains guidance on biodiversity, urban greening and BNG. Once the SPD is finalised, this action will be complete.	80%
	BE2.5	Review and amend the existing planning application validation process to incorporate consideration of whether biodiversity surveys and reports are relevant and necessary for an application.	Improvements have been made with the provision of biodiversity assessments being included in the current validation checklist with plans to updated in the near future. However, there is still work to be done here to ensure that it aligns with BNG requirements.	40%
AP3	ECE3.1	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.	There has been adhoc progress made in this space with numerous training sessions run for City Corporation employees (e.g. lunch and learn on GiGL) however a more comprehensive approach is being worked on. This will be covered mainly by the work of the Comms Partnership working group to have clear communication channels for key stakeholders in addition to better capture of training records that is already taking place.	30%

ECE3.2	Support resident and community groups that contribute to local and national species recording and monitoring initiatives, through providing direct support for initiatives, by providing training and by collecting and promoting best practice that current groups have demonstrated.	<p>There is a close working relationship with a number of volunteering groups within the city and the City Corporation. Friends of City Gardens support with garden maintenance and upkeep, biological recording and monitoring as well as supporting corporate volunteering groups. The City Corporation has also run a number of public events to support educate and train the community such as The City Nature Challenge. As part of the BAP working groups, guidance on habitat management is being developed and there is also work being carried out to alleviate some of the pressures of arranging corporate volunteering by the City Corporation taking over the management of this.</p> <p>There are a number of gardening groups that the City Corporation has yet to fully engage with and this will be a priority moving forward.</p>	30%
ECE3.3	Develop guidance on supporting pollinators in the built environment by enabling biodiversity partnership working group.	The creation and running of the BAP Partnership Group has enabled the coming together of experts and key stakeholders from across the City to drive forward the BAP agenda. With regards to this particular action on supporting pollinators, the Pollinators BAP Partnership group headed up by Pollinating London Together (PLT) is creating a support document for all land managers/owners in the city to provide clear guidance on the “Dos and Don’ts” to support pollinators in the city.	70%
ECE3.4	Promote and disseminate guidance for the London Invasive Species Initiative (LISI) species to raise awareness of these species and how they should be managed.	With the SharePoint page set up for the BAP Partnership group, this information is shared here. Work still needs to be done to ensure a wider audience can access this information and so will feature once the CoL internal Biodiversity intranet page is established.	50%

AP4	DCSM4.1	Maintain, improve, promote and utilise the information and services available via the GiGL SLA(Service Level Agreement) including to be achieved through providing internal training.	Good progress has been made in this space. A lunch and learn was held for City Corporation staff to learn more about GiGL and the work they do. There has been an SLA group established to ensure that key stakeholders are aware of the SLA and the services GiGL can provide. Further work needs to be done on how we best use these services across the corporation (including outside of the Square Mile) and make best use of the resource.	50%
	DCSM4.2	Develop and implement a planning condition which requires developers of relevant schemes to collect and submit relevant biological data of their site to the CoL PA to improve data monitoring and assessment on biodiversity trends in the City.	Requirement for data has been included in the Sustainability SPD with a request that GiGL is sent this data also. Planning condition updates will come with BNG implementation.	60%
	DCSM4.3	Produce a biological recording strategy to target SINC's with under-recording of species and promote good practice. To include identification of target sites, under-recorded and desired species, promotion of best practice, identifying and promoting appropriate recording methods for different audience and supporting existing citizen science and species-specific campaigns.	<p>This is a key action for the Biological Recording BAP Partnership Groups. The group have so far established key stakeholders and the current recording methods used across the city. The plan is to now consolidate this and have clear direction as to the best approach to recording in order that all the information finds its way to GiGL. This will enable a spatial map to be produced and poorly recorded areas can be addressed. There are already a number of key species-specific events that are supported by the City Corporation such as the Big Butterfly Count but a regular calendar of these events is to be established.</p> <p>Risk management will be a key element of the strategy in order that we maintain good records of the biodiversity of the city. An example of this is one of our key volunteers and top recorders is moving out of the City which will have a great impact on our</p>	30%

			<p>monitoring.</p> <p>GiGL are going to support with some info-graphics on most common and rarest finds in the city to help as promotional material for the biological recording strategy.</p> <p>To support the work of recording, the City Corporation is in the process of deploying Agrisound sensors which work to record pollinators. This will be a tool to support the work of biological recording but is not in the position to replace recording.</p>	
	DCSM4.4	Identify funding to carry out a Black Redstart and bat baseline survey to guide future management interventions and enhancements.	As stated previously, the intention is that this will be supported by the LNRS species action plans. This will be supported by a bioacoustics project being undertaken by students from Imperial College London's ecology evolution and conservation course, and one of the college's readers in conservation ecology Cristina Banks-Leith.	50%
	DCSM4.5	Undertake below ground mapping to identify opportunities and barriers for establishing new green infrastructure and SuDS within the public realm.	The Environment Resilience team carried out this work and the report is utilised in decision making processes for new green infrastructure and SuDS. This action is complete.	100%
	DCSM4.6	Research and establish an approach to monitoring earthworms as an indicator of soil health and condition.	A member of the City Garden's team is researching and developing a recording methodology and survey to monitor earthworms in the City's gardens.	20%

Glossary

Explanation of terms used in BAP:

All London Green Grid: The All London Green Grid (ALGG) is a Greater London Authority (GLA) framework to promote the design and delivery of 'green infrastructure' across London.

Barbican Wildlife Group (BWG): The BWG is a group of volunteer local residents who, with the City Gardens team, preserve, protect and enhance biodiversity in Barbican Wildlife Garden for the education and enjoyment of all Barbican Estate residents and guests. BWG also promotes the conservation of the Garden's many habitats and its retention as a wildlife haven within the City. It also aims to foster and promote biodiversity within the Estate and to work with likeminded groups and organisations to promote and foster biodiversity within and beyond the Square Mile.

Biodiversity: Biodiversity is the term used to describe the variety of life on Earth. This includes wildlife such as animals, birds and plants, the habitats which are the places they live and how they all interact within their surroundings as part of the ecosystem.

Building Research Establishment Environmental Assessment

Methodology (BREEAM): BREEAM is the world's leading sustainability assessment method for master planning projects, infrastructure and buildings. It addresses a number of lifecycle stages such as new construction, refurbishment and in-use.

Citizen Science: Citizen science is scientific research conducted by amateur or nonprofessional enthusiasts. Citizen science may be performed by individuals or groups of volunteers and interested parties.

City of London Corporation: The City of London Corporation provides local government and policing services for the financial and commercial heart of Britain, the 'Square Mile'.

City Gardens: The City Gardens team are responsible for tree and green space management for around 200 open spaces in the Square Mile including parks, gardens, churchyards, plazas and highway planting. The City Gardens team is also responsible for Bunhill Fields Burial Ground just outside the City boundary in the London Borough of Islington.

Corporate Social Responsibility (CSR): CSR is a process which companies choose to follow to take responsibility for their actions and encourage positive impacts through their activities on the environment, consumers, employees, shareholders, communities and all other members of the public who may also be considered as stakeholders.

Department for Environment Food & Rural Affairs (Defra): Defra is a UK government department responsible for safeguarding our natural environment, supporting our world-leading food and farming industry, and sustaining a thriving rural economy. Our broad remit means we play a major role in people's day-to-day life, from the food we eat, and the air we breathe, to the water we drink.

Friends of City Gardens (FoCG): A community group of volunteers comprising City residents, City of London Guides, City workers and other interested parties. They support the City Gardens Team and have a special interest in promoting and enhancing biodiversity.

Greenspace Information for Greater London (GiGL): GiGL is the capital's environmental records centre that collates, manages and makes available detailed information on London's wildlife, parks, nature reserves, gardens and other open spaces.

Green Corridors: Almost continuous areas of open space which are linked. They can act as wildlife corridors and serve amenity, landscape and access roles.

Green Infrastructure: A strategically planned and managed network of green spaces and other environmental features vital to the sustainability of any urban area. This includes although not exclusively trees, biodiverse roofs, green walls and green corridors.

Draft City Plan 2036: The City Corporation's Local Plan for the future development of the City of London, setting out what type of development the City Corporation expects to take place and where. It sets out the City Corporation's vision, strategy and objectives for planning up to 2036, together with policies that will guide future decisions on planning applications.

Local Nature Recovery Strategy (LNRS): Local nature recovery strategies will agree priorities for nature recovery and propose actions in the locations where it would make a particular contribution to achieving those priorities. The responsible authorities and people involved in preparing a strategy can choose how they want it to look, but every strategy must contain:

- A local habitat map.
- A written statement of biodiversity priorities.

Local Nature Recovery Plan: A localised plan for our own area of responsibility using the LNRS as guidance.

London Biodiversity Partnership: The London Biodiversity Partnership was formed in 1997 to bring together organisations to benefit wildlife and boost the capital's green space.

National Planning Policy Framework (NPPF): Sets out government's planning policies for England and how these are expected to be applied.

Open Mosaic Habitat: Open Mosaic Habitats on Previously Developed Land (OMH) is defined by the Defra. They are found mainly in urban and formerly industrial areas and have high biodiversity value. This value includes rare plants, mosses, lichens and a large number of rare invertebrates, especially bees, wasps and beetles.

Open Space: Open space is land which is not built on and which has some amenity value or potential for amenity value. Amenity value is derived from the visual, recreational or other enjoyment which the open space can provide, such as historic and cultural interest and value. This includes open spaces in public or private ownership.

Sites of Importance for Nature Conservation (SINCs): Sites are designated as SINCs to highlight areas of ecological value in the City. The sites are graded as being of Metropolitan (SMINCs), Borough (SBINCs), or Local (SLINCs) importance.

Sustainable Drainage System (SuDS): A range of sustainable measures for surface water management which reduce the amount, flow or rate of surface water discharge into sewers.