



# City Gardens

## City of London Draft Biodiversity Action Plan 2016-2020

### Consultation Statement

March 2016

City of London –  
protecting green  
spaces since  
the 1850s

## **INTRODUCTION**

City Gardens, Open Spaces Department, City of London Corporation have prepared the City of London Draft Biodiversity Action Plan (BAP) 2016-2020.

## **CONSULTATION REQUIREMENTS**

Consultation on the City of London Draft Biodiversity Action Plan 2016-2020 took place between Tuesday 2<sup>nd</sup> February and Friday 18<sup>th</sup> March 2015. The following stakeholder groups were consulted:

- City of London Biodiversity Action Plan Partnership Group which includes representatives from the relevant department of the City of London Corporation, the biodiversity or open space representatives of neighbouring boroughs, business, community and resident representatives and ecology and biodiversity professionals.
- Key officers from City of London Corporation departments.
- Consultation poster with a link to the consultation webpage to both download and provide comments and feedback was displayed in noticeboards at St Mary Aldermanbury Garden, Bunhill Fields Burial Ground, West Smithfield Rotunda Garden, Postman's Park, Finsbury Circus Garden, St Botolph Without Bishopsgate and St Dunstan in the East.
- Consultation posters displayed at Guildhall, Artizan Street, Barbican and Shoe Lane libraries with hard copies of the Draft Management Plan made available.
- An advert in City AM on Thursday 18<sup>th</sup> February 2016 including the Draft Biodiversity Action Plan consultation.
- Webpage created on the City Gardens website and an e-newsletter sent out to subscribers.
- Draft Management Plan consultation promoted on City of London Corporation social media streams.

The consultation period resulted in constructive comments from 16 individuals which have been acknowledged and addressed with amendments made to the management plan were appropriate. The comments are detailed in the table below along with an explanation as to whether the comment was included in the revised management plan.

<b>1.0</b>	<b>Organisation</b>	
	Not specified, comment received by a member of the public	
	<b>Comments Received</b>	<b>City Corporation Response</b>
<b>1.1</b>	<p><b>Comment</b></p> <p>I would like to ask one question. On page 8 Bunhill Fields is included. An asterix on page 9 explains it is not, however, within the city plan area. This is one of my favourite places, so it's great that it is included.</p> <p>However, it leads me on to ask why Highgate Wood is not included (also outside the plan area but maintained by the city Corporation), and likewise other places that meet this same criterion e.g. Hampstead Heath &amp; Epping Forest.</p> <p>Don't these merit at least one word each in the City's proposed BAP?</p> <p>If there is a good reason for not even mentioning them by name anywhere in the BAP, all well and good. Nonetheless, could we not consider adding a paragraph or two saying how wonderful they are, and a mention of the reason why they fall outside the scope of this BAP? Wouldn't they deserve this / wouldn't this be beneficial?</p>	<p>Further detail added to 1.4.</p> <p><b>Why does the City need a Biodiversity Action Plan</b>, to clarify that City of London Corporation managed open space located outside the Square Mile is not covered in the CoL BAP 2016-2020 with the exception of Bunhill Fields.</p> <p>Two paragraphs explaining the above added at 1.4 –</p> <p><b>Why does the City need a Biodiversity Action Plan?</b></p>

<b>2.0</b>	<b>Organisation</b>	
	Swift Conservation	
	<b>Comments Received</b>	<b>City Corporation Response</b>
<b>2.1</b>	<p><b>Comment</b></p> <p>Thanks for showing this to me. I was relieved to see Swifts included as just a waterfront species, as it were, as I have become increasingly bleak about the prospects for bird life being in any way sustainable amidst the glass buildings and the continuously-glazed canyon-like corridors that are being rapidly created throughout the City. Is there any mention of the effects of continuous glass and mirror-glass glazing on bird life within the Draft Plan? There is considerable interest in this topic in the USA and Canada, where there have been legal consequences to the erection of all -glazed so-called "bird killing" buildings.</p>	<p>This specific concern cannot be addressed in the Biodiversity Action Plan but comments will be passed onto the Department of Built Environment, Planning Team.</p>

<b>3.0</b>	<b>Organisation</b>	
	The London Beekeepers' Association	
	<b>Comments Received</b>	<b>City Corporation Response</b>
<b>3.1</b>	<p><b>Comment</b></p> <p>I have a few comments about the proposed new BAP document.</p> <p>Firstly I am very concerned about reference to encouraging Bee hives within the square mile.</p> <p>Policy DM 19.2 addresses biodiversity and urban greening and states that developments should promote biodiversity and contribute to urban greening by incorporating:</p> <ul style="list-style-type: none"> <li>• features for wildlife, such as nesting boxes and beehives;</li> </ul> <p>Contrary to all the impending bee apocalypse stories featured in the press and fuelled by the likes of FoE there are no shortages of honey bees in the UK. Honey bees are far from being in declines, in the past decade numbers of amateur beekeepers has risen from 8,500 to over 25,500 keepers and national colony numbers have climbed to over 250,000 hives. Honey bees and their beekeepers tending to them face challenges such as varroa mite and exotic diseases but they are in no way under threat or endangered in the UK. London alone has over 5000 colonies and parts of the city have among the highest honey bee hive density per km2 of anywhere in the country. Encouraging developments to include honey bee hives as a planning gain or as other green incentives is bogus and counterproductive. Increasing honey bee colony numbers in a part of the city with very limited foraging will simply place increased pressure on existing colonies of honey bees and increase competition between managed honey bee colonies and wild pollinators - many of which are under real threat.</p>	<p>Reference to encouraging beehives is a direct quote of City of London Local Plan 2015, Core strategic Policy CS19: Open Spaces and Recreation.</p> <p>The draft BAP does not promote or encourage the installation of beehives but does include a pollinator as a target species. The document refers to pollinators in general with a number of objectives that contribute to increasing the availability of forage.</p>

Honey bees are generalists foraging on a wide range of flower sources whereas many of our wild bumble bees and solitary bees have more specific flower requirements. Wild bees have physical and behavioural adaptations to allow them to avoid competing with the far more numerous honey bees but in an environment such as the city with limited foraging opportunities and high densities of honey bee hives competition for floral resources will be forced upon them. There is also the increased risk of honey bee pathogens spreading to wild bees in these circumstances.

In recent years we have witnessed increasing numbers of corporates in the city acquiring bee hives on their roof tops. Many of these have been convinced by monetising so called experts that installing hives on roof tops is good for biodiversity and improves the companies green credentials. This is simply not the case and many of these hives become poorly tended to, throw out numerous swarms each spring which places organisations like ourselves and our volunteer swarm collectors under a great deal of pressure. Last year alone I was called to Monument, Bank and Aldgate to collect swarms, one of which was 5 storeys up the side of a building requiring use of the window cleaners' platform to reach them. LBKA actively discourages further use of 'bees as bling' on commercial developments and argues that encouraging hives on new developments is misguided.

<p><b>3.2</b></p>	<p><b>Comment</b></p> <p>Re: 3.2 priority species for the city</p> <p>Bumble bees - which many of our bumble bees are in decline and do need our help I feel that there is little that can be done for bumble bees in a much built up square mile of the city. Aside from planting more of the right types of flowers to provide forage for them there is little that can be done in the city to attract and encourage bumble bees. Unlike honey bees and cavity nesting wild bees bumble bees cannot be easily encouraged to make use of artificially created nest boxes. Bumble bees rely on abandoned rodent burrows for their nests (Aside from the recently arrived Tree bumble bee which will use bird nest boxes but since being a recent arrival is not deemed a conservation priority). There is however a balance between having sufficient rodent population to provide abandoned burrows for nesting bumble bees and having too many rodents, since rats and mice predate bumble bee nests. Research shows that a majority of newly founded bumble bee nests are predated and fail because of rodent attack. I would think that the high rodent population in the city would be counterproductive to encouraging bumble bees.</p> <p>The most likely species found in the square mile are the buff tailed bumble bee and tree bumble bee - the commonest two species and not of particular conservation priority. The use of a mason or leafcutter bee as a mascot/symbol of pollinators and their conservation would make more sense, they are non aggressive, easy to get up close to, do not sting and readily encouraged to nest.</p> <p>I think a far easier group of bees to encourage in the city are solitary cavity nesting bees. Mason and leafcutter bees are readily attracted to trap nest boxes, require a far smaller foraging area than bumble or honey bees and are easier to encourage. These species are equally as important for ecosystem services as bumble bees and many are equally if not more at risk. Measures to encourage these species will be far easier to monitor and quantify successes than bumble bees.</p>	<p>Bumblebees were selected as a target species by the City of London Biodiversity Action Plan Partnership Group as a flagship species for pollinators and highlights how individuals can support solitary bees. Once the City of London Corporation has access to habitat and species datasets held by GiGL more informed decisions can be made with regard to the selection and opportunities for target species.</p>
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<b>4.0</b>	<b>Organisation</b>	
	c/o Shire Green Roof Substrates Limited	
	<b>Comments Received</b>	<b>City Corporation Response</b>
<b>4.1</b>	<p><b>Comment</b></p> <p>This is a fine document and I have passed some comment, mostly small points, directly to a tracked changes version of the action plan (attached).</p> <p>One general area of omission is the River Thames, and I suspect that this is a case of easier said than done! Other than seeing commuting cormorants going to the Thames to feed we have no idea of what species of fish are now present. During the 1980's I worked in Thurrock and used to visit the outfall from Thurrock power station and the range of fish species coming through was astonishing! Now 30 years later we have no idea what species are regularly present. It is quite possible that new species have colonised but we wouldn't know. Goodness knows how to monitor this but the Port of London Authority seem to be the right people to do this. If not some other scheme to find out should be explored. Also, are there any other waterways or culverts in the city that could hold fish. I have seen fish in the ponds in the Barbican but do we know what species are present?</p> <p>During the breeding bird survey of the City last year we recorded nesting grey wagtail, kestrel and coal tit. The wagtail is interesting as this seems out of habitat, but it is a very attractive species and they seem present with several pairs. Kestrel seems like a species to preserve as they eat mice. The coal tit is interesting but I am not yet sure if there is much significance to them breeding, but it is nice that they have joined the list of breeding species.</p>	<p>The Tidal Thames is recognised for its importance as a Site of Metropolitan Importance for Nature Conservation but there is a clear need to improve the evidence base to develop more targeted objectives for the Tidal Thames.</p> <p>Following the SINC review due to take place during 2016 a SINC Management Plan will be developed with the relevant City of London Corporation departments and partner organisations will be included.</p>



4.2	<p><b>Comment</b></p> <p>I may be out of synch with others but I am not sure I understand why swift are on target species? Were they once common in the city? Definitely a good species to have but is there some reason to think that they might nest? For one thing are there enough airborne insects? House martin might be easier to bring into the city, and apparently they respond to the provision of artificial nests. I noticed that there are some already on the Eversheds roof. Unfortunately during the 2016 breeding bird survey there was very little evidence to suggest that swifts were coming into the city - perhaps the air quality above the city is not good enough for much by way of flying insects. That might be the best question to ask before going to the expense of installing many swift boxes</p>	<p>The swift was selected as a target species by the City of London Biodiversity Partnership Group to contribute towards enhancing the riverside (the Tidal Thames is a Site of Metropolitan Importance for Nature Conservation - SMINC).</p> <p>The review of the SINC in the City of London during 2016 as well as access to GiGL habitats and species datasets will help inform the most appropriate species to target and to promote.</p> <p>These recommendations will be developed as part of a SINC management plan for the Tidal Thames in partnership others.</p>
4.3	<p><b>Comment</b></p> <p>Re:1.2 What is Biodiversity</p> <p>I suggest that this (fungi) is added as species in this kingdom are vital and surprisingly separate from animals and plants. The City has at least one keen naturalist that has a serious interest in this topic.</p>	<p>Description in 1.4 What is Biodiversity? Modified to include fungi.</p>

<p><b>4.4</b></p>	<p><b>Comment</b></p> <p>I think the BAP should make it clear that native, species (or close relative) are favoured. Tree and plant species that are from far away places may attract unwelcome species and will be rather sterile from the point of view of native species that we wish to encourage. For instance a red beech in St. Mary Aldermanbury's Garden attracted several migrant birds last year presumably because it held more insects.</p>	<p>Any tree and planting lists that are developed or promoted as part of an ecology toolkit will highlight the advantages and disadvantages of native species.</p>
<p><b>4.5</b></p>	<p><b>Comment</b> Re: 3.1 Habitats</p> <p>Should there perhaps be some action identified for an ongoing monitoring of water species (e.g. fish) using the Thames. Bear in mind that the cleaning of the Thames offers the potential for species of fish to recolonise the Thames. This is not something for volunteers but perhaps the Port of London should be monitoring the biodiversity of the Thames and issueing an annual report?</p>	<p>On completion of a review of the City of London SINC's a SINC management plan will be developed for the Tidal Thames which will include the objective of increasing the understanding of habitats and species within and besides the Thames.</p>
<p><b>4.6</b></p>	<p><b>Comment</b> Re: 3.2 Target species</p> <p>I realise that a choice needs to be made, but as far as I know Swifts are scarce in the City and the chances are that nest box schemes will not be successful. Why not target House Martins? This is a question not an objection though but I wonder if we should include Kestrel as a desirable nesting species?</p>	<p>Consideration to promoting all biodiversity including house martins will be included when developing guidance and a SINC</p>

		management plan.
<b>4.7</b>	<p><b>Comment</b> Re: 3.8 Health and wellbeing</p> <p>Pollution due to traffic problems and NOx should be monitored and mapped for the city. Also air temperature as the City Heat Island effects can be followed, as greening activities take effect. Improved air quality should be a measurable result of the increased biodiversity. Is this being done?</p>	<p>Air quality is currently monitored within the City of London. The BAP includes an objective to support the mapping of urban greening features which can then be utilised for future studies and research.</p>
<b>4.8</b>	<p><b>Comment</b> Re: 4.3 Swift – <i>Apus apus</i></p> <p>I am happy to see Swift included but I wonder if they were ever a regular in the City? No objection to this remaining as it is but I wonder if this should be broadened to include House Martins. I noticed that Eversheds have installed artificial House Martin nests as well as swift boxes.</p>	<p>The City Corporation does not currently have access to data that suggests swifts are regularly present in the City.</p>
<b>4.9</b>	<p><b>Comment</b> Re: 4.4 Peregrine falcon – <i>Falco peregrinus</i></p> <p>Is it worth mentioning that Peregrines offer a natural control on pigeon numbers?</p>	<p>Comment incorporated into species description, 4.4 Peregrine falcon – peregrine.</p>

<b>4.10</b>	<p><b>Comment</b> Re: 4.7 <i>Lucanus cervus</i></p> <p>The Lesser Stag Beetle was identified in Fann Street wildlife garden in 2015. Should this section also mention the importance of other species of beetle?</p>	<p>The BAP identifies that the stag beetle is a flagship species for all invertebrates. It is the intention that the objectives of the BAP will support habitats for other species of beetle as well monitoring populations.</p>
<b>4.11</b>	<p><b>Comment</b> Re: 5.2 Action Plan 2: The built environment</p> <p>Some existing holes in old walls should be kept open for nesting birds. Some structures could have restricted openings to keep pigeons out but completely blocked holes are a missed opportunity.</p>	<p>This action will be incorporated in to the management plans for existing and historic structures.</p>
<b>4.12</b>	<p><b>Comment</b> Re: Table 2 - Action Plan 1: Open Space and habitat management</p> <p>OSHM1.10 – Review and install bird feeding stations in all SINC sites and other suitable open spaces. This may be an important step for House Sparrows</p>	<p>Point noted and will be incorporated when developing SINC Management Plans.</p>
<b>4.13</b>	<p><b>Comment</b> Re: Table 3 – Action Plan 2: The Built environment</p> <p>BE1.1 Produce a strategy of which biodiversity is a key component for new and retro-fitted green roofs.</p> <p>I think this should be a priority as there are many roofs that could benefit from greening. Even if only to install some planters.</p>	<p>Importance of this aspect noted. This specific objective will consist of an audit rather than a strategy.</p>

<b>4.14</b>	<p><b>Comment</b></p> <p>Re: Table 4 – Action Plan 3: Education and community engagement</p> <p>ECE1.27 - Provide advice to residents and businesses that wish to feed the birds adjacent to open spaces</p> <p>This is a very good idea. More specific foods that favour birds but not pigeons and rats.</p>	<p>Point noted when developing guidance and advice documents.</p>
<b>4.15</b>	<p><b>Comment</b></p> <p>Re: Table 5 – Action Plan 4: Data collection, surveys and monitoring</p> <p>DCSM1.11 - Conduct an annual summer roof top/breeding bird survey. One survey per year. Identify funding to support survey, report production and volunteer expenses.</p> <p>This is a good idea as some roofs seem rather sterile while others have abundant life. It would be good to understand what factors make the difference.</p>	<p>The City Gardens Team will continue to support and learn from the findings of the Friends of City Gardens annual summer bird survey.</p>
<b>5.0</b>	<b>Organisation</b>	
	Friends of City Gardens	
	<b>Comments Received</b>	<b>City Corporation Response</b>
<b>5.1</b>	<p><b>Comment</b></p> <p>1. The document is well written, the structure works well and it is refreshingly ambitious in its objectives, which is great. Clearly considerable time and effort have</p>	<p>It is the intention that the Biodiversity Action Plan will be delivered within the</p>

<p><b>5.2</b></p> <p><b>Comment</b></p>	<p>gone in to producing this document, which has already benefitted from consultation and collaboration with members of the BAP Partnership Group.</p> <p>2. Resourcing</p> <p>To achieve the BAP objectives will require substantial resources. We think it will be difficult to deliver all the objectives with the current resources in the City Gardens team. Firstly, there are a substantial number of documents that need to be completed, such as Habitat and Species Action Plans, updating websites, plant lists etc. Secondly, organising the events and activities, hands on gardening and monitoring of outcomes of these activities is also very time consuming. Some of these objectives can be delivered by volunteers and BAP partners but the co-ordination and monitoring of volunteers and accounting for time credits (another BAP objective) is another big job.</p> <p>Successful delivery of the BAP is clearly dependent on adequate resources. Several of the BAP actions are described as being 'dependent on funding', but this applies across the piece to delivery of all the proposed objectives. And external funding cannot be a substitute for adequate allocation of Open Spaces budget.</p> <p>Adequate allocation of resources should be addressed up front in the document itself preferably in the introduction. And when the BAP is presented to committee for approval the resources to deliver it should be discussed as part and parcel of the approval process.</p> <p><b>5.3</b></p> <p><b>Comment</b></p> <p>3. Tidal Thames</p> <p>Clearly this is an important habitat and Site of Metropolitan Importance - it is one that the City currently has little control over. We agree it should be included in the BAP - and there should be a joined up plan for this important habitat that the City could sign up to - this would appear to be 'Management Guidance for the Thames</p>	<p>current resources available to the City Gardens Team but will rely upon the co-operation of other City of London Corporation departments and partner organisations.</p> <p>It has been identified in the BAP that a number of the objectives are funding dependent which officers will seek to pursue.</p> <p>Following the review of SINC's in the City of London during 2016, which includes the Tidal Thames, data gathered from this process will be used to inform a SINC management plan. Relevant City of London Corporation departments and partner organisations will be encouraged to work together to achieve objectives as outlined in the plan.</p>
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	<p>Estuary'. The City is probably a signatory to this - but there needs to be more explanation of the management objectives and actions in the BAP. Perhaps the City Planners should take the initiative here and liaise with the relevant authorities (Port of London Authority, Environment Agency, Natural England, Port of London Authority) to update and clarify what is expected of the City and what more can be done to enhance this habitat. There are a number of on-going monitoring projects and conservation projects that volunteers from the City would be interested in supporting - perhaps reference should be made in the BAP to the key invertebrates and mammal species. Recruiting volunteers for these projects and installing some interpretation information for the public on the Thames Path walkway could be added as a BAP objective.</p>	
5.4	<p><b>Comment</b> Re: 3.2 Target species</p> <p>Consideration might be given to adding the common frog as there are no amphibians in the target list</p>	<p>The list of target species was agreed with the City of London Biodiversity Action Plan Partnership Group. We acknowledge the importance of promoting open standing water and the species this supports. Evidence will be gathered over the duration of the BAP to inform future target species and biodiversity interventions.</p>
5.5	<p><b>Comment</b> Re: 3.3 Sites of Importance for Nature Conservation</p> <p>The map would be more useful if it included the names of the gardens and also the location and names of the proposed new SINC</p>	<p>This map will be out of date following the SINC review taking place in 2016 and a new and updated map with information including size, accessibility and</p>

		location will be produced and made available on the City of London website.
<b>5.6</b>	<p><b>Comment</b></p> <p>Re: 3.5 Access to nature and green space in the City</p> <p>This paragraph should be more specific – i.e. what proportion of the population live in an area of deficiency. Including the GiGL map of areas of deficiency would be helpful.</p>	<p>More detail regarding deficiency in access to nature and green space in the City of London once the City Corporation have agreed a SLA with GiGL and information relating to SINC and open space datasets has been reviewed and updated.</p>
<b>5.7</b>	<p><b>Comment</b></p> <p>Re: 4.0 Target species</p> <p>Although the 2 species on the London priority list - common toad and Great crested newt are not resident in the City the inclusion of the common frog does justify the creation of ponds as a habitat - which also benefits things like dragon and damselflies.</p>	<p>The BAP includes an objective to identify opportunities to provide water for biodiversity which includes open standing</p>



		water and ponds. Any species which can be supported in these habitats will be identified in SINC management plans.
<b>6.0</b>	<b>Organisation</b>	
	Barbican Wildlife Group	
	<b>Comments Received</b>	<b>City Corporation Response</b>
<b>6.1</b>	<b>Comment</b>	
	Reference to the biodiversity network is missing. This is easily addressed in the	The City of London Biodiversity Action Plan

	<p>Introduction to the BAP in 1.1 The City: a Unique urban environment.</p> <p>The BAP covers only those open spaces within the direct control of City Gardens. They also are key to the essential linking of all gardens within the Square Mile in a biodiversity network. I suggest this could be easily dealt with by inserting the following paragraph I in the Introduction.</p> <p>The Square Mile also benefits from the major open spaces not maintained directly by the City itself. We work closely with nearly all</p> <p>These open spaces include a number of gardens created by the long established livery companies, the Inner and Middle Temples, the residential estates rising from the ashes of the Second World War.</p> <p>Although these open spaces account for 21% percent of all open spaces NEED UP TO DATE STATISTIC of all gardens within the Square Mile. Many of these open spaces are active members of the City of London Biodiversity Action Plan Partnership Group and participate in City wide activities, including Open Garden Squares Weekend.</p>	<p>2016-2020 covers all features and open spaces of current and potential biodiversity value in the City of London including those managed by key partners.</p> <p>Additional detail added to 1.4 <b>Why does the City need a Biodiversity Action Plan?</b> To clarify the remit of the BAP.</p> <p>A full list of open space typologies and categorisations which covers all open spaces regardless of ownership are detailed in appendix 3.</p>
<b>7.0</b>	<b>Organisation</b>	<b>Organisation</b>
	On behalf of the Monitoring and Information Team, Department of Built Environment,	City of London Corporation
	<b>Comments Received</b>	<b>City Corporation Response</b>
<b>7.1</b>	<p><b>Comment</b></p> <p>Re: 1.1 The City: A unique urban environment</p>	<p>Updates to figures referenced in 1.1 The City, a</p>

	<p>Replace 400,000 workers with 415,000 workers</p> <p>Replace 9,000 residents with 7,800 residents</p>	<p>unique urban environment.</p>
<p><b>7.2</b></p>	<p><b>Comment</b></p> <p>Re: 1.3 Biodiversity in the City</p> <p>1<sup>st</sup> sentence: factually correct but not all these contribute to biodiversity. Suggest rephrasing along the lines:</p> <p>The City of London has approximately 376 open spaces totalling 32 hectares. These open spaces are a range of different typologies of which Parks and Gardens, Cemeteries and Churchyards, Amenity Green Space, and the Natural Semi Natural Urban Green Spaces provide an important environment for supporting biodiversity. This is complemented by a range of Civic Spaces which include a comprehensive range of tree cover.</p>	<p>Revisions made to relevant paragraph in 1.3 <b>Biodiversity in the City</b> based on these comments.</p> <p>Link to appendix 3: open space typology and categorisation to the full list of typologies used in the City of London included in paragraph 1.3, Biodiversity in the City.</p>
<p><b>7.3</b></p>	<p><b>Comment</b></p> <p>Re: 1.3 Biodiversity in the City</p> <p>Phrase “and in addition to this at rooftop level there is an increasingly important resource for biodiversity’ – suggest move to a new paragraph – suggest text -</p>	<p>Additional details added to 3.10 <b>Sustainability in the Built Environment</b>.</p>

	<p>At rooftop level there is an increasing environment for biodiversity delivered through Green Roofs<sup>1</sup> which has increased from 15,000m<sup>2</sup> in 2005/06 to 50,000m<sup>2</sup> in 2014/15. This includes two types of Green Roof</p> <ul style="list-style-type: none"> <li>(a) Intensive which requires a programme of management, and</li> <li>(b) Extensive which requires low levels of management and equate to a natural environment which aids biodiversity.</li> </ul>	
<b>7.4</b>	<p><b>Comment</b> Re: 3.3 Sites of Importance for Nature Conservation</p> <p>Paragraph 3.3. – Table 1 and Figure 1 do not correlate – new Figure 1 to be produced.</p>	<p>Figure 1: Map of Sites of Importance for Nature Conservation (SINCs) in the City of London has been updated.</p>
<b>7.5</b>	<p><b>Comment</b> Re: Table 3 – Action Plan 2: The built environment, Action BE2.4</p> <p>Action BE2.4 -Promote case studies and industry guidance to support the development and enhancement of green roofs and living walls for biodiversity.</p> <p>Should this be rephrased to focus on the environment of the city? I.e. delivering biodiversity in City of London has a range of challenges different to other locations.</p>	<p>The ecology toolkit that will be developed as part of action BE2.3 will focus on biodiversity interventions and guidance specific to the City.</p>
<b>7.6</b>	<p><b>Comment</b> Re: Table 5 – Action Plan 4: Data collection, surveys and monitoring, Action DCSM1.10</p> <p>Suggest reword</p>	<p>Update to action Table 5, Action Plan 4, action DCSM1.10 to take into consideration the</p>

	<p>Use ARCGIS and the Corporate Intranet GIS tool to integrate mapping relating to Biodiversity:</p> <ul style="list-style-type: none"> <li>(a) Factors that contribute to Biodiversity including, Open Spaces, Green Roofs, SINC's, and Tree Cover.</li> <li>(b) Biodiversity features e.g. bird boxes and bee hives.</li> <li>(c) Areas of opportunity</li> </ul>	suggested rewording.
<b>7.7</b>	<p><b>Comment</b></p> <p>Re: 8.1 Appendix 1: National, regional and local policy</p> <p>Appendix 8 - DM 18.2 comes under Core Strategic Policy CS18: Flood Risk</p>	Local policy details updated in Appendix 1.
<b>8.0</b>	<b>Organisation</b>	
	Department of Built Environment, City of London Corporation	
	<b>Comments received</b>	<b>City Corporation Response</b>

8.1	<p><b>Comment</b> Re: 3.2. Target species</p> <p>'these species are exemplars of their ecological niches and also are in many cases highly adapted to the urban environment' Term 'ecological niche' needs explaining</p>	Definition of 'ecological niches' added to paragraph in 3.2 target species.
8.2	<p><b>Comment</b> Re: 3.4. Open Spaces Audit</p> <p>RE: City of London Local Plan's Key City Places Rest of the City is not a Key City Place. It is the area outside the 5 Key City Places.</p>	Bullet point for 'Rest of the City' removed in 3.4, <b>Open Spaces Audit</b> .
8.3	<p><b>Comment</b> Re: 3.5 Access to nature and green space in the City</p> <p>Having made this point should the BAP identify how many residents (if any) in the City are further than 1km from a publically accessible SBINC, otherwise it isn't clear whether this is a problem or not?</p>	The City of London Corporation currently does not have a Service Level Agreement (SLA) with GiGL and therefore does not have access to the data to calculate this. An objective of the CoL BAP 2016-2020 is to enter into SLA with GiGL which is funding dependent.
8.4	<p><b>Comment</b> Re: 3.8 Health and Wellbeing</p> <p>'Access to green space and nature is also linked to improving the mental health</p>	Suggestion incorporated

	<p>and wellbeing of individuals'</p> <p>Should this also mention the importance of green space in creating quieter and tranquil areas for City workers, residents and visitors?</p>	into in 3.8 Health and Wellbeing
<b>8.5</b>	<p><b>Comment</b></p> <p>Re: 5.0 Action Plans</p> <p>If would be useful to define the BAP objectives</p>	Aims of the Action Plans added to 1.5 <b>Structure of the Biodiversity Action Plan</b> and the introduction in 5.0 Action Plans.
<b>8.6</b>	<p><b>Comment</b></p> <p>Re: 5.1 Action Plan 1: open space and habitat management</p> <p>This section could also refer to joint working with the Environment Agency and the Port of London Authority to enhance biodiversity along the river.</p>	Comment incorporated into relevant paragraph of 5.1, Action Plan 1: open space and habitat management.
<b>8.7</b>	<p><b>Comment</b></p> <p>Re: 5.1 Action Plan 1: open space and habitat management</p> <p>'The SINC management plans will help promote good management of open spaces for biodiversity and include a range of enhancements'</p> <p>Add 'consider the impact of climate change on biodiversity choosing plants that are resilient to a range of climate impacts'</p>	Suggestion added to bullet points in 5.1 Action Plan 1, open space and habitat management.
<b>8.8</b>	<p><b>Comment</b></p> <p>Re: 5.1 Action Plan 1: open space and habitat management</p>	Suggestion added to relevant paragraph in 5.1,

	Suggested addition: The Thames Tideway Tunnel which is due to be completed in 2023 will improve water quality and associated biodiversity in the Thames by reducing sewer discharges into the river.	Action Plan 1, open space and habitat management.
<b>8.9</b>	<p><b>Comment</b> Re: 5.2 Action Plan 2: The built environment</p> <p>'Ensuring lighting associated with constructions sites do not unnecessarily illuminate open spaces and disrupt bat foraging routes'</p> <p>Suggest adding – ensure new lighting in public realm enhancement schemes does not have an adverse impact on biodiversity</p>	Suggestion added to the bullet points that feature in 5.2 Action Plan 2: The Built Environment.
<b>8.10</b>	<p><b>Comment</b> Re: 5.2 Action Plan 2: The built environment</p>	This intervention will not be suitable for all sites and will



	<p>'Land left fallow for any length of time should be sown with annual wildflower species to provide visual amenity as well as pollen and nectar'</p> <p>Not sure this is something we could agree with in relation to vacant development sites.</p>	<p>vary depending on length of time the site is available. This could be used on sites which are unlikely to be landscaped until the next planting session i.e. November to March. An annual seed mix can be used to provide temporary seasonal display similar to seasonal bedding but with greater biodiversity benefits. Table 3 – Action Plan 2: The built environment, action BE2.6 amended to clarify this.</p>
<b>8.11</b>	<p><b>Comment</b></p> <p>Re: 5.3 Action Plan 3: Education and community engagement</p> <p>Should also refer to the new City of London Primary Academy Islington, which is due to open on the edge of the City in Sept 2017</p>	<p>Reference incorporated into relevant paragraph of 5.3, Action Plan 3, education and community engagement.</p>
<b>9.0</b>	<b>Organisation</b>	
	Department of Built Environment, Development Division	

	Comments Received	City Corporation Response
9.1	<p><b>Comments</b> Re: 3.10 Sustainability in the built environment</p> <p>p.13 – suggest amend 1<sup>st</sup> line of 3.10 – The built environment represents an important habitat in the City. This includes historic structures and monuments as well as new developments. Historic walls, churchyards and monuments may support .....</p>	<p>Suggested amendment incorporated into relevant paragraph of 3.10 <b>Sustainability in the built environment.</b></p>
9.2	<p><b>Comment</b> Re: 5.1 Action Plan 1: Open space and habitat management</p> <p>p.17 – Suggest amending middle paragraph to: “Many of the City’s open spaces such as the churchyards have a strongly historic character that underscores their biodiversity to strong effect. A number include historic structures such as <del>parts of</del> the Roman and medieval City wall, exposed <del>Victorian</del> building basements, elements of former churches damaged or altered after the Second World War, gravestones <del>destroyed in the Blitz</del> and memorial structures. Their structures provide an excellent host for mosses, lichens and ferns and other wall-dwelling species. Many of these sites are unique habitats that will be surveyed and monitored. The SINC management plans for those sites will require all interested parties, including departments within the City of London Corporation, Historic England and Natural England, to be made aware of any proposed developments. The sites will managed taking into consideration the habitat features identified and the desirability of maintaining their unique historic character.” Many of these sites and structures are designated assets such as scheduled ancient monuments, listed buildings, or within conservation areas and Historic Parks and Gardens; all of which have statutory protection.</p>	<p>Suggestions amended and incorporated into paragraph 5.1, Action Plan 1: Open space and habitat management. Additional details and more accurate description of historic structures received with thanks.</p>
9.3	<p><b>Comment</b> Re: Table 2 – Action Plan 1: Open space and habitat management</p>	<p>There is no plan to include a specific objective for</p>

	Action plan – suggest including a specific objective related to churchyards or registered parks & gardens	<p>churchyards or registered parks and gardens as these sites are adequately acknowledged with associated objectives throughout the action plans.</p> <p>All Registered Parks &amp; Gardens are currently SINCs and are recognised for their importance for nature conservation through this system. A list of Registered Parks &amp; Gardens added to 8.5 Appendix 5: Registered Parks &amp; Gardens.</p>
<b>9.4</b>	<p><b>Comment</b></p> <p>Re: Table 2 – Action Plan 1: Open Space and habitat management</p> <p>OSHM 1.4 – it would be beneficial for this to be carried out in a partnership of DBE (Planning) OS and CS.</p>	Contributing partner for action OSHM 1.4 updated to include CoL DBE.
<b>9.5</b>	<p><b>Comment</b></p> <p>Re: 8.1 Appendix 1: National, regional and local policy</p> <p>p.35 – include reference to relevant Historic Environment policies in the Local Plan (CS 12, DM12.1, DM12.2)</p>	Relevant policies from Core Strategic Policy CS12: Historic Environment added to 8.1 Appendix 1: National, regional and local policy.
<b>9.6</b>	<p><b>Comment</b></p> <p>Could more be said about the Thames foreshore as a habitat?</p>	The evidence base we have for The Tidal Thames is

		limited which is reflected in the document and Action Plans. The SINC review of the Tidal Thames and development of a Management Plan as well as working with partner organisations will be a starting point to recognising the importance of the Thames foreshore as a habitat.
9.7	<p><b>Comment</b></p> <p>Re: 3.6 Achievements and recommendations - bullet point two</p> <p>'The main aim of The Tree Strategy to increase City owned trees by 5% by 2019 was reached and exceeded in 2014'</p> <p>Statement incorrect, aim yet to be achieved.</p>	Text updated in relevant bullet point of 3.6 achievements and recommendations to reflect that this objective has yet to be achieved.
9.8	<p><b>Comment</b></p> <p>Promote the City of London Tree Strategy</p>	5.2. Action Plan 2: The built environment identifies the key areas the City of London Tree Strategy promotes. The specific objectives relating to biodiversity in the Tree Strategy Part 2 have been added to 8.1 Appendix 1: national, regional and local policy.
10.0	<b>Organisation</b>	
	Greenspace Information for Greater London (GiGL)	

	Comments Received	City Corporation Response
10.1	<p><b>Comment</b> Re: 1.2. What is Biodiversity?</p> <p>Could add something about why we should see biodiversity is important e.g. ecosystem resilience supporting ecosystem services, as well as intrinsic value and appreciation?</p>	Reference to wider benefits of biodiversity added to paragraph in 1.2 What is Biodiversity?
10.2	<p><b>Comment</b> Re: 2.2 Regional Policy</p> <p>Could also maybe cite the Natural Capital Green Infrastructure Task Force, Dec 2015, Report here?</p>	Reference to Natural Capital: Investing in a Green Infrastructure for a Future London included in paragraph and cited in bibliography.
10.3	<p><b>Comment</b> Re: 3.1 Habitats</p> <p>'A further habitat recognised as a London biodiversity habitat target that falls within the City of London is the Tidal Thames and standing water which includes ponds'</p> <p>...As well as a Site of Metropolitan Importance for Nature Conservation</p>	Reference to the Tidal Thames being the City's only Site of Metropolitan Importance for Nature Conservation (SMINC) added to paragraph in 3.1, habitats.
10.4	<p><b>Comment</b> Re: 3.5 Access to nature and green space in the City</p>	

	<p>The majority of open spaces in the City are identified as 'Pocket Parks' with a minority of 'Small Open Spaces'. These should be less than 400 metres for residents to access from their homes.</p> <p>Does this mean that the City is well provisioned in terms of access or that there are some known areas to improve? Could you describe the AoD (or map it) as above for SINC AoD? GiGL could create a map/s for the report from our AoD datasets to your specification if helpful to explain these points?</p>	<p>Paragraph amended in 3.5, access to nature and green space in the City, to make it clear that this is the general criteria for areas of deficiency in access to open space from the London Plan and not specific for the City.</p> <p>Mapping areas of deficiency would be useful to demonstrate this and we plan to pursue this following the SINC review taking place in 2016 and a review of the open space data held by GiGL.</p>
10.5	<p><b>Comment</b></p> <p>Re: 3.7 Achievements and recommendations</p> <p>'The survey and monitoring of SINC's also needs to be improved so that the</p>	<p>Suggestion of re-phasing incorporated in paragraph</p>

	<p>outcomes of nature conservation work can be properly evaluated. The digitising of data and sharing with organisations such as GiGL is essential for understanding biodiversity not just in the City but across London as a whole'</p> <p>Thanks for including this point. I've re-phrased this slightly to be more specific as GiGL as the sole LERC for London, then facilitate the sharing of the centralised information with other decision-makers or data users such as ecological consultants engaging with the planning system, the Greater London Authority, NGOs operating in the area, community groups etc. etc. Echoes how you explain it later.</p>	<p>of 3.7 <b>achievements and recommendations.</b></p>
10.6	<p><b>Comment</b></p> <p>Re: 3.10 Sustainability in the built environment</p> <p>There is an opportunity here to mention the chance to encourage recording and</p>	<p>There is opportunity for future collaboration and data sharing with regard to</p>

	<p>monitoring of these urban greening features similar to the SINC/biodiversity data. There is an existing London dataset. GiGL and the GLA are both interested in ongoing improvements to data on these features. Any data provided to GiGL would be incorporated into the emerging London Urban Greening Features dataset (which City of London already have a good representation in, in terms of green roofs)</p>	<p>urban greening features. The distribution of green roofs is currently being recorded and analysed as part of the City of London Local Plan Monitoring Report on Green Roofs produced by the Department of Built Environment.</p> <p>Reference to mapping urban greening features incorporated Table 5 – Action Plan 4: Data collection, surveys and monitoring, action no DCSM1.10.</p>
10.7	<p><b>Comment</b>  Re: 4.1 House sparrow – <i>Passer domesticus</i></p> <p>Maybe an opportunity to mention citizen science again as house sparrows are a</p>	<p>Mention of wider input from partner organisations and the importance of resident involvement included in 4.1</p>



	good target species for public involvement in monitoring as demonstrated by surveys such as LWT/LBP/RSPB's Cockney Sparrow Project (and others).	House sparrow – <i>Passer domesticus</i> , as the isolated pockets of house sparrows strongly feature in residential areas.
<b>10.8</b>	<p><b>Comment</b> Re: 4.5 Bats – <i>Chiroptera</i> spp.</p> <p>They are certainly recorded in other parts of the City, I've checked the GiGL records. Though they are sensitive so you don't want to be too specific, GiGL can confirm that verified records of bats have been observed in different parts of the City, including recent years.</p> <p>Again, sharing new data with the Local Environmental Records Centre so it can be shared with local bat experts, and inform ecological consultants/members of the public engaging with the planning process etc. will also contribute to their protection and study.</p>	Thank you for confirming that recent verified records are available for the City. We hope to have access to this information by entering into a Service Level Agreement with GiGL to inform SINC management plans and targeting biodiversity interventions in the City of London.
<b>10.9</b>	<p><b>Comment</b> Re: 4.7 Stag beetles – <i>Lucanus cervus</i></p> <p>Again, opportunity to mention the suitability (and popularity) of this species as a focus for public engagement, recording and monitoring effort? (existing successes e.g. LWT staggering gains project and PTES work on the species)</p>	Sentence added to paragraph in 4.7, Stag beetles – <i>Lucanus cervus</i> to highlight the importance of the stag beetle as a flagship species and promote habitat management for all invertebrates.
<b>10.10</b>	<p><b>Comment</b> Re: 5.4 Action Plan 4: Data collection, surveys and monitoring</p> <p>'The data currently held and reported for the Square Mile does not reflect unique</p>	Paragraph updated in 5.4 Action Plan 4, Data,

	<p>habitats such as green roofs that have been created in the City or the presence of priority species for conservation'</p> <p>This statement about existing information needs altering – the current data holdings <i>do</i> reflect green roofs and presence of priority species (see below). But the previous and subsequent points about continuing to keep data up to date and informing decisions are certainly still applicable!</p> <p>GiGL does hold and share within the partnership a dataset of green roofs, including over 40 in the City (actually better data availability for City than for many other Local Authorities) this data is in addition to a dataset of other habitats including the City's previous habitat survey, which didn't include green roofs/walls in the survey scope. This Urban Greening Features dataset would be enhanced by including new green roofs from new developments and monitoring their success and their use by wildlife – so suggest rephrasing to say that the City has potential to build on and enhance the existing evidence on these habitats.</p> <p>GiGL's species dataset of protected and priority species for conservation does include records for the City (there are over 200 records made to at least 100m resolution within the City with conservation listings, plus others made to a broader resolution/in the surrounding area that would be relevant to local planning). Agree though that additional information will be able to be mobilised from existing sources and new data gathered to improve this number and make City's evidence base more robust and informative.</p>	<p>collection, surveys and monitoring to clarify that the data is currently held on green roofs and priority species by GiGL but the City Corporation has limited access to interpret this information.</p>
<b>11.0</b>	<b>Organisation</b>	
	c/o London Natural History Society	
	<b>Comment</b>	<b>City Corporation Response</b>

<p><b>11.1</b></p>	<p><b>Comment</b></p> <p>The Friends of City Gardens have made me aware of the consultation on the City of London's Biodiversity Action Plan. Please find here some comments which are primarily about butterflies.</p> <p>The link to the draft Biodiversity Action Plan was provided at:  <a href="http://www.cityoflondon.gov.uk/things-to-do/green-spaces/city-gardens/about-us/Documents/city-of-london-draft-biodiversity-action-plan-2016-2020.pdf">http://www.cityoflondon.gov.uk/things-to-do/green-spaces/city-gardens/about-us/Documents/city-of-london-draft-biodiversity-action-plan-2016-2020.pdf</a></p> <p>The Biodiversity Action Plan appears constructive and while butterflies are not covered in detail, it is the provision of habitat that is important. Obviously, most of the gardens, parks and public spaces are small in area, which presents some additional challenges.</p> <p>Two of the Action Plans, 5.1 and 5.2 refer to increasing shrub cover and tree planting. That for shrub cover includes reference to 'Consideration of the biodiversity value of planting when designing, refurbishing or enhancing current open spaces'. There are only a limited number of British butterfly species that are dependent upon shrubs and trees. Of these, I would suggest two species of butterfly that could be encouraged to the City with appropriate planting:</p> <p>Holly Blue</p> <p>The larval foodplants are Holly and Ivy. Surveys undertaken by the London Natural History Society, Butterfly Conservation and others are showing that the Holly Blue is more common in the urban areas of London than in the areas at the edge of Greater London. The Holly Blue is a species than can be attracted to urban areas.</p> <p>Brimstone</p>	<p>Thank you for the comprehensive response focusing on the provision of suitable habitat for butterflies and plants that are important species.</p> <p>The BAP now refers to supporting wider monitoring initiatives referring to supporting the London Natural History Society's Butterflies of London Project.</p> <p>Any guidance and SINC management plans that are developed will take into consideration all species, including butterflies, which a site can potentially support but do not feature as a target species.</p> <p>Any recommended plants can be promoted as part of the BAP and referred to in the ecology toolkit and web-based resources.</p>
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	<p>Brimstone butterflies are relatively large, the males are a fluorescent yellow and the females a whitish-green, and they fly for several months of the year. It should be relatively easy to attract them to the City of London. Their requirements are simply the provision of either Alder Buckthorn or Common Buckthorn, on which the adults lay eggs and the leaves are the larval food-plants. Brimstones can smell and then locate the shrubs from some distance. In a survey of 1980-86, the Brimstone was absent from large swathes of north London (and there were no records from the City of London). Planting of Alder Buckthorn (<i>Frangula alnus</i>) in areas of north London during recent years, has established populations of Brimstones in urban areas.</p> <p>Furthermore, the shrub or small tree, is small leaved and the foliage is fairly light, so is ideal for smaller sites. It can be pruned in winter to whatever shape or size is required (the Brimstone eggs are laid in the spring).</p> <p>Note. While Holly, Ivy, Alder Buckthorn and Common Buckthorn have plant parts (for example the berries) that are considered poisonous if eaten in quantity, these and other plants have been common in the British countryside for hundreds if not thousands of years.</p> <p>I attach also a fuller list of plants that are important to species of butterfly. The Species Action Plans for the Black Redstart (including green roofs); for the Bumblebee (nectar sources are also used by adult butterflies); and for the Stag Beetle (several species of butterfly over winter as adults and benefit from voids in log piles etc.) are all welcome.</p>	
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