

APPENDIX 3

Results of Southwark Biodiversity Action Plan Consultation 2012

Ongoing consultation has been undertaken through Southwark Biodiversity Partnership workshops and meetings.

A BAP workshop was held at the 2011 Friends of parks forum and an online consultation was held from 16th May until the 18th June 2012 for stakeholders and Council departments. This included:

- Southwark Biodiversity Partnership
- Internal – Department: Planning Policy, Development Control, Housing, Highways, and trees.
- Parks and Open Spaces staff members
- Grounds Maintenance Contract Manager

External Consultation was also held with the GLA, London borough's biodiversity forum, London Wildlife Trust, Trust for Urban Ecology, Bankside Open Spaces Trust, Better Bankside, Groundwork London, Parks Friends Groups, Friends of the Earth Southwark and Southwark PCT.

BAP consultation plan

The following internal and external consultees were consulted in June 2012.

Internal consultation

Development Management – Comments received from Urban forester
Planning Policy - comments received
Housing North and South - no comments received
Highways - no comments received

External consultation

Friends of the Earth – comments received
London Borough Biodiversity Forum – no comments received
GLA - no comments received
London Wildlife Trust - no comments received
The Trust for Urban Ecology- no comments received
Bankside Open Spaces Trust - no comments received
Groundwork London- no comments received
Better Bankside- no comments received
Friends of Parks groups - no comments received
Southwark PCT - comments received
This was in the form of an online consultation and was held in June 2012
General public consultation through the web site - comments received

The public consultation Questionnaire is below.

London Borough of Southwark's

Biodiversity Action Plan – Consultation Questionnaire

1. Do you agree with the themes and objectives in the Biodiversity Action Plan?

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2. Do you agree with the policies identified in section 2?

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3. What do you think are the benefits of biodiversity? Section 3.

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4. Do you agree with our assessment of Biodiversity in Southwark?

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5. Do you agree with the theme based approach to biodiversity in Southwark?

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6. Do you agree with the actions proposed in Theme 1 Wildlife and Ecosystems services?

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7. Do you agree with the actions proposed in Theme 2 The Urban Forest?

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8. Do you agree with the actions proposed in Theme 3 The Built Environment?

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9. Do you agree with the actions proposed in Theme 4 Climate Change and Sustainability?

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10. Do you agree with the actions proposed in Theme 5 Connecting with Nature?

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11. What do you think are the most important ways to improve Biodiversity in Southwark?

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

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Comments resulting from the online consultation

It would be good to mention the benefits of natural play

<http://www.nationaltrust.org.uk/what-we-do/news/view-page/item788564>

It would be good to include specific examples where has happened mown grass and low maintenance planting

some good ideas

Need publicising on how other groups can help

people need to understand more about what we have and some examples of success what to do to improve

Comments from the following groups or individuals:

- **Friends of the Earth**
- **Southwark Public Health Dept**
- **Simon Hughes local resident**
- **Oliver Stutter Urban Forester**
- **Planning Policy**



Flat 4,
Goschen House,
68 Peckham Road,
Camberwell,
London SE5 8QE.

Jonathan Best,
Ecology Officer,
London Borough of Southwark,
160 Tooley Street,
London SE1 5JX.

22nd June 2012

Dear Jonathan,

Re:- Southwark Friends of the Earth's Response to the Southwark Biodiversity Action Plan 2012-18.

We support the aims of the document, however, we are extremely concerned as to how all this will be complied with when planning applications are considered and planning officers recommend approval despite the compilation of this document, especially when developers start emphasising the economic advantages of their schemes, compared with the extra costs of implementing the Biodiversity Action Plan. Of course, there is also the alternative, that where there is a mixed development of retail and social housing, there is also the threat that the only way that the developer could attain the Council's requirement of affordable housing, would be by ignoring the document, or they would require a large percentage increase in retail homes (homes for sale) to cover the cost of implementation.

There is one item we'd seriously question and that is your policy regarding trees in the borough.

Whilst the policies in question sound OK, the recent example of tree management calls the whole section into question. E.g. It states that: **Trees are important for food and habitats**: The trees being used by species needed for nesting and larder, this cannot be achieved if totally inappropriate 'pollarding' is in operation, and the second point is, the erection of bird and bat boxes, these should not be put in places where they'd be vulnerable to predators. Trees that have recently been 'pollarded' across the borough at present provide no protective cover or limbs for birds to build their nests but are being 'pollarded' at the wrong time of the nesting season. If this could also be accounted for when the Tree Strategy is reviewed.

It is also well known that trees felled releases a lot of carbon so when this borough loses a lot of trees, through the policies of both administrations, it is clear they're not considering this factor even though they're signed up to the emissions reduction target.

The Built Environment:

We are pleased that the habitation of species other than humans is to be taken into account when developments are being drawn up, in other words, as part of the design of the development, not an afterthought. Also we are pleased to see that where a building is proposed, close to a woodland, there should be a 10m buffer zone which we can only understand to mean a minimum of 10 metres, if this is incorrect then the document is incorrect, but we believe this should be the minimum anyway.

This figure should be the closest section of wall to the woodland and not to the wall of the Undercroft.

Thank you very much for giving us an extra week to complete our responses to the document.

Yours sincerely,

Jim and Stephanie Lodge
Southwark Friends of the Earth

Dated Friday 22nd June 2012

**Southwark Public Health Dept response to Biodiversity Action Plan.
Do you agree with the themes and objectives in the Biodiversity Action Plan?**

We welcome this plan and the links made to health and well-being throughout. We also recognise that developing greater biodiversity and a more resilient and balanced approach managing Southwark's ecology, will also help to mitigate the threats to health posed by climate change. There may also be longer term economic benefits in terms of reduced use of resources and lower management costs where a more sustainable approach is taken.

There is an increasing body of evidence for the benefits to health of exposure to natural environments. A recent paper from the Faculty of Public Health¹ argues that green space can play an important part in tackling a range of health and social problems – obesity, cardiovascular disease, mental ill-health, antisocial behaviour, and health inequalities. It outlines the evidence that the natural environment can enhance our health and wellbeing, and explains how town planners, health professionals, policymakers and people themselves can work together to create more green space and make better use of it for the benefit of all.

Raising levels of physical activity is certainly key, particularly in Southwark where there are high levels of long term conditions such as diabetes, cardio-vascular disease and obesity where physical activity has a key role in preventing disease and slowing up progression. Apart from the promotion of physical activity, it has been suggested that a natural environment may have intrinsic qualities which enhance health or well-being and reduce depression. Subtler effects on mood, mental well-being, attention etc also need to be considered. A recent systematic review² (Bowler D E et al) attempted to synthesise findings in these areas and using the stringent methods of meta-analysis found that the range of studies it synthesised, suggest that natural environments may have direct and positive impacts on well-being independent of physical exercise.

A large scale study, *The effect of exposure to natural environment on health inequalities: an observational population study*³ (Mitchell, R and Popham, F) found that populations that are exposed to the greenest environments also have lowest levels of health inequality related to income deprivation and postulate that physical environments that promote good health might be important in mitigating the effects of socioeconomic health inequalities.

The biodiversity strategy also has the potential to support achievement on several of the *Public Health Outcome Framework* indicators, e.g.

- Utilisation of green space for exercise/health reasons
- Air pollution
- Self reported well-being
- Social connectedness

Perhaps this is something to mention in the discussion of relevant strategies in Section 2 as from April 2013 the local authority will be responsible for improving health and strengthening achievement on a wide range of public health indicators. Fuller details can be found at

¹ *Great Outdoors: How Our Natural Health Service Uses Green Space To Improve Wellbeing* available at http://www.fph.org.uk/uploads/r_great_outdoors.pdf

² *A systematic review of evidence for the added benefits to health of exposure to natural environments* available at <http://www.biomedcentral.com/1471-2458/10/456>

³ Abstract available at <http://www.thelancet.com/journals/lancet/article/PIIS0140-6736%2808%2961689-X/abstract>

Do you agree with the policies identified in section 2?

Yes – useful that so many interlock. Could maybe also mention beneficial effect on children of exposure to natural environment and the opportunities for informal play as Southwark is a young borough). There are national, London and local strategies for play. Most recently the mayor of London issues a draft SPG: *Shaping Neighbourhoods: Children and Young People's Play and Informal Recreation*⁴. There is increasing realisation of the benefits of natural play e.g. Play, naturally: A review of children's natural play⁵.

In section 2.5 we note that the areas identified as AoD are amongst the most densely populated and would like therefore to see actions directed at reducing this deficiency in these areas. Recognising that the creation of new space is unlikely, we would like to see maximum use made of small, possibly neglected, spaces and open space around social housing. The breakdown of habitats in Southwark in Table 6 does not show clearly how much land is attached to social housing estates. However it is generally true that in some areas, the landscape managed by social landlords is estimated to be equal to or greater than that which is managed by the local authority parks' services. The quality of these green spaces has a huge impact on the lives of social housing tenants and other people living in those neighbourhoods and because they are is on the doorstep, more people have the potential to benefit as do those who have more limited mobility. *Greener Neighbourhoods: A good practice guide to managing green space*⁶ discusses some of the issues. Other examples of good practice can be found at www.neighbourhoodsgreen.org.uk.

What do you think are the benefits of biodiversity identified in Section 3?

The benefits to health are well covered. Could perhaps mention Green gyms – slightly ambiguous term as it can refer to robust outdoor gym equipment installed in parks as

is already happening. However is also used for volunteers doing regular gardening and

conservation sessions to keep fit. More at:

<http://www.idea.gov.uk/idk/core/page.do?pagelid=27130447>

The Conservation Volunteers support Green gyms. More at:

<http://www.tcv.org.uk/greengym/health-benefits>

There do not appear to be any Green Gym projects running in Southwark but might this initiative be worth considering?

Could also link to the idea of Lifetime Neighbourhoods. These are places 'which offer

everyone the best possible chance of health, wellbeing, and social, economic and civic

engagement regardless of age.' A recent government publication *Lifetime Neighbourhoods*

⁴ available at <http://www.london.gov.uk/publication/shaping-neighbourhoods-children-and-young-people%E2%80%99s-play-and-informal-recreation-spg>

⁵ available at <http://www.playengland.org.uk/resources/play,-naturally-a-review-of-children%27s-natural-play.aspx>

⁶ available at <http://www.neighbourhoodsgreen.org.uk/upload/documents/webpage/Greener-neighbourhoods-weblinks-2110.pdf>

(DCLG 2011)⁷ states: 'The importance of green space for health and well-being cannot be underestimated and is an essential component of lifetime neighbourhoods.'

Do you agree with the actions proposed in Theme One Wildlife and Ecosystems services?

Management is briefly mentioned however does there need to be more explicit discussion of the use of herbicides and pesticides by council and its contractors? (e.g. on hard surfaces, other amenity spaces not managed by the council, school grounds, Network Rail etc.). Might it also be helpful to provide information to residents, garden centre staff etc to help guide choice of the best products to use in gardens etc? Supporting biodiversity means that the use of such chemicals needs to be very judicious otherwise the aspiration for biodiversity is undermined. Whilst it is appreciated that there is strict legislation, are there some products, e.g. neonicotinoids where developing evidence suggests that non target populations may be damaged, in this case bees. Are there other products where it may be wise to adopt a precautionary approach? It's a pity if biodiversity, food chains, bee forage etc are undermined and retaining bird populations means a good supply of invertebrates is needed.

Do you agree with the actions proposed in Theme Two The Urban Forest?

Are there also trees on railway land? Does the management of railway land generally need more consideration? – presumably Network Rail owns it – does not seem to be mentioned.

The item about the Forest Schools initiative could be clearer – hard to understand what it involves. If it is about increasing tree planting in school grounds it sounds a good idea.

Do you agree with the actions proposed in Theme Three The Built Environment?

Quite a lot of the actions here appear to relate to new developments. We are supportive of the increase in grassland managed for biodiversity but wonder if there is more potential for making best use of this existing resource to support biodiversity. It is striking that when it comes to trees, there are as many trees on housing estates as there are in parks and open spaces! See comments on previous page.

Do you agree with the actions proposed in Theme Four Climate Change and Sustainability?

Yes – does mention need to be made of the need to ensure sufficient forage is planted for the bees in addition to finding a suitable location?

Do you agree with the actions proposed in Theme Five Connecting with Nature?

Many good ideas here for informing and engaging the public and using new media to encourage greater participation. Supportive of the involvement of universities – Kings College London has an active geography department and staff with interests in ecology and cities.

Southwark I spy booklet for children???

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

It would be helpful if the glossary can be in alphabetical order.

⁷ available at <http://www.communities.gov.uk/documents/housing/pdf/2044122.pdf>

Comments from Simon Hughes –local resident.

Dear Jon,

It is heartening to read such a clear document setting out what Southwark is trying to do and how it will do it. As you are the main author, I congratulate you.

It would appear that our small efforts to improve Greendale are all in accordance with Southwark's aims and that we can take encouragement from you and expect your support.

I note some very small points you might like to consider:

1. In Table 3.5 you list Lead Partners and it took me some time to realise that these were not the partners listed in 2.2.
2. On page 16, last bullet point the word "apparitional" looks out of place; should that be "aspirational"?
3. On page 21 you have an action for invasive species; should injurious weeds, like Greendale's creeping thistle, be included? Should this type of problem be listed in 3.13?
4. In Table 3.8 you mention the GIS Officer, but I could not find the decode for GIS. There are many Geographical Information Systems serving many purposes. Does Southwark have one or is it a sub set of another?
5. I struggled a bit decoding the various abbreviations etc. Could the glossary on page 41 be clarified, perhaps in columns with the letters on the left and decode on the right? It would take up more space, but it would help the ignorant reader such as myself, and there is a blank page 42.
6. I note with some amusement that the only real person in the whole of the borough hierarchy fingered with an actual action is Oliver Stutter (Table 3.8)!
7. On page 40 under Veolia Enviro Grant Scheme you have a closing date of 31 Mar 2012.

I learned much from reading your action plan, and will no doubt refer to it often.

Yours,

Simon Hughes.

Comments from Oliver Stutter Senior planner urban forest.

Thanks John, I think it reads very well and is concise enough to actually stand a chance of getting actioned!

One core objective for the UF is an i-tree survey to provide a base line for evaluating changes in a range of values, Lendlease are looking to complete a pilot project with Chris Baines and other research bodies at Heygate.

The upcoming Heritage SPD may need to be mentioned plus the GLA climate change, tree strategy SPDs and a few others that escape me.

Comments from Planning Policy

The adoption of the Local Biodiversity Action Plan will assist the delivery of future planning policies and development decisions in the borough. The actions set out in the Biodiversity Action plan will be incorporated into planning decisions and planning policy development to ensure that the impact of future development on levels of biodiversity is taken into account.