

LIBERAL DEMOCRAT SUBMISSION TO THE Biodiversity Action Plan

Islington Liberal Democrats (ILD) welcome the opportunity to provide comments on Islington Council's latest Biodiversity Action Plan (BAP) 2020 to 2025. Islington's first-ever BAP was of course published in 2005 by the then Liberal Democrat administration.

We have a number of observations on the plan as a whole, as well as comments on specific aspects of it.

Summary

For the Biodiversity Action Plan ("BAP") to be effective, it must be based on current, local data specific to the habitats and species found in Islington; thus setting a benchmark against which the success of the plan can be measured.

Additionally, the BAP should have targets and timetables for delivery of key objectives and should include a plan for funding of these key objectives.

As well as planning for new green spaces and habitats, the BAP should have a robust plan for protecting and enhancing existing spaces across the borough and seek ways to improve connections between such spaces.

ILD views on the consultation

1. With respect to the benchmark measurements, we note that there has not been a full survey of the sites of nature conservation ("SINCs") since 2010. A new survey should be commissioned to ensure that all locations in need of protection are identified and to gather the data against which the success of the BAP can be measured.

The BAP appears to rely upon the London-wide assessment of habitats and protected species, rather than local data. What work has been undertaken to identify Islington-specific considerations?

2. With respect to funding for the BAP, the Council should commit to allocating Community Infrastructure Levy monies to green projects listed in the BAP. The natural capital represented by our green spaces and the tangible physical and mental health benefits which they bring, helps to justify the need for investing in the natural environment, particularly in a densely populated borough like Islington.

3. Close to the centre of London, as well as being densely populated, Islington inevitably has limited green space. Our BAP should specifically address working with neighbouring boroughs. Improved connectivity should be a key goal for the BAP: trying to create natural

corridors to link parks and green spaces across borough boundaries where relevant. These green corridors might also facilitate active travel, creating quieter routes across the borough.

While the creation of new green spaces/habitats is a worthwhile, if unquantified, objective of the BAP; more needs to be done to conserve and improve existing habitats. More detail should be provided on goals and targets – what will success look like? How will the Council measure habitat enhancement?

4. We note that the BAP needs to work alongside the Local Plan and that an Urban Greening Factor (UGF) will be developed to identify the appropriate amount of urban greening required in new developments. Please provide more details on the targets for UGF in the BAP rather than leaving this to the Local Plan.

As well as reviewing the BAP in 2025, it will be important that it is reviewed at the mid-way point, to ensure that it is on track to deliver the specified goals and allow for adjustments if necessary.

5. The list of partner organisations at the back of the BAP does not include civic or community groups, such as the Angel Association, Canonbury Society and Highbury Fields Association to name just a few. Nor does it mention other potential contributors such as Arsenal Football Club, local shopping centres, large office blocks and the many housing estates and housing associations across the borough. The list of partner organisations should be expanded to include civic and community groups and resident associations as well as key local businesses.

6. **Built Environment Action Plan:** Require a tree officer/biodiversity officer to approve new opportunities in built environment. Mandate *net gain of biodiversity* in planning applications. Assess existing council buildings to see if they are suitable for green roofs. Will existing plans in the pipeline be re-assessed to see if they meet the criteria in the BAP and if not, is it possible to propose changes to those plans? Whilst the building of new social housing is essential, what can be done to enhance the biodiversity of such projects?

7. **Parks and Urban Green Spaces Action Plan:** Formalise ways of improving biodiversity in parks e.g. by leaving grassy areas unmowed, creating meadows, and by adding and widening hedges and set specific targets for this. Set targets for green projects on housing estates. Promote greater collaboration between Housing and Greenspace to facilitate and encourage new projects on estates. Actively promote Octopus; seek to expand the number of estates with which they work. Set targets for number of new pocket parks.

8. **Designated Sites Action Plan:** Collate accurate and Islington-specific data. Lobby TfL and Network Rail to encourage greater protection of rail-side SINCS.

9. **Access to Nature Action Plan:** Actively encourage adding green space on housing estates such as via planters, community gardening projects, hedges and green walls. Set measurable targets. Even more could be done to increase community involvement in the

BAP – for example, encouraging residents/school children to monitor and report their observations of species via the Council website. The creation of new green spaces in school playgrounds and on housing estates, adding growing spaces, green walls, green roofs and hedges should be a core objective for the plan with measurable targets attached. Streamline the events application process which can be very time consuming for community groups seeking to organise events in parks.

10. The BAP is one element of the Council’s approach to the climate emergency. Appointing a dedicated Biodiversity Officer will be an effective way of ensuring a joined-up approach to the objectives of the BAP and its contribution to Vision 2030.

In conclusion, there is great potential to deliver improved Biodiversity across Islington if the draft BAP is amended to include measurable targets based on accurate local data, with CIL funding earmarked for green projects. The focus must not simply be on creating new green space, but on protecting and improving our existing green space and working with our neighbours to improve the connections between green spaces across London. A comprehensive review at the mid-point allowing changes to the plan, if necessary, will further improve the chance that the BAP will be capable of delivering the worthwhile goal of net gain in biodiversity.

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