

## BEXLEY NATURAL ENVIRONMENT FORUM RESPONSE TO PARKS AND OPEN SPACES CONSULTATION

The Forum is the umbrella body for 'Friends of' groups and wildlife conservationists in Bexley.

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The Forum is taking this opportunity to pull together and re-iterate a number of points it has previously made about open spaces and their management in Bexley. We are somewhat concerned that the consultation has only been available on-line, which may have disproportionately excluded older residents. We understand that in a public consultation of this sort, largely aimed at individuals, 'yes/no' and ranking types of answer are quicker and easier to analyse and produce aggregated outcomes from, but we feel that there should have been some boxes in which people could have elaborated on various points in their own words. In particular, the format has not provided for a means of addressing the most controversial issues around Bexley's open spaces, namely the selling off of some of them and the number and scale of the grants of building permission on designated Sites of Importance for Nature Conservation and immediately adjoining land of equally high wildlife value.

The map page for specific suggestions did not work when I tried it, and again was not designed for 'policy'-related comments.

Our key points are as follows:

- There is a global biodiversity crisis, including in Britain. This is not just of lists of species, but also of species ranges, numbers of sites occupied and population sizes – even of hitherto quite common species. In Britain the situation has been summarised in the 'State of Nature' reports, but others dealing specifically with birds, butterflies and moths, for example, confirm that the situation is dire and despite some high-profile successes, such as the Large Blue butterfly and White-tailed Sea Eagle, still getting worse. In addition, it is widely recognised (e.g. the Lawton report) that we need larger, more joined up areas to recover nature and allow it to move in response to climate change. Bexley Council needs to play a positive part in turning this around, not making it worse. We reject the Council's de facto policy of claiming that cramming more wildlife into less space is a long term solution to the problem, and we are concerned at the lack of sites occupancy, long term security and population size data for the Borough being presented when decisions are being made to concrete the homes of Biodiversity Action Plan priority species, such as reptiles, and those that are simply scarce in our particular Borough.
- BNEF remains opposed to the selling off of and building on parks and open spaces of all kinds, and particularly SINCs. It would like to remind the Council of the known high value of brownfield in the 'Thames gateway' area so that it not always appropriate to prioritise such sites for 'development'. The Cory/Borax site was found to be of at least regional importance for invertebrates AFTER Bexley Council had given outline planning permission and had wrongly claimed it was a brownfield site (in our view, to try and diminish its perceived importance for nature), which under the NPPF it was not. If long-disused sites revert to nature and become occupied by species of conservation importance then this should be celebrated and properly taken into account rather than ploughing ahead because they were designated for some other use, perhaps many years ago.
- The Parks and Open Spaces Strategy, which we believe is still in force, said that the Council would improve 'at least 15' for biodiversity. It is encouraging that this means that far more than 15 could be so managed. Given the damage being approved to be done to SINCS, with more

applications to build on them in the pipeline, it is essential that the capacity of all other sites to support wildlife is enhanced. The fastest, easiest and cheapest way to do that is cut less grass. It might well save money. This would increase the amount of vegetation, flowers and invertebrates in particular. An example would be North Heath Rec which has had the highest House Sparrows count in the Borough. This species has declined significantly and needs both 'weed' seeds and invertebrates. In the wider landscape we look to farmers to leave uncultivated margins to help recover numbers of birds and other species. Why not more of this in Bexley? We believe areas buzzing with grasshoppers and dancing with Gatekeeper butterflies would be more interesting for people, and areas of rougher vegetation more stimulating for their dogs.

- We welcome the Council's recent efforts to support Friends groups more and to encourage new ones to start up. For maximum effect there needs to be a joined up approach between this and the Biodiversity Action Plan which is now 3 years out of date. There is no sign that the Council is consulting 'stakeholders' such as myself, who are responsible for helping implement parts of the BAP, about what progress has been made, updates or the requirements and scope for additional projects and targets. This needs sorting out. In July 2015, 80% of Sites of Importance for Nature Conservation wholly or partly owned by Bexley Council had no management plan (i.e. only 1 in 5 did), and 3 of the 6 plans that did exist had expired more than 7 years previously. As far as we know the situation has not improved. This needs to change so that nature gets a fair crack of the whip in Bexley's 'multi-functional' world and so that an informed, strategic approach is taken. Planting trees is generally good, but not the best approach everywhere, and if Friends Groups wind up spending all their time providing free litter-picking service for the Council and trying to sort out anti-social behaviour or 'over-tidying', where tidiness is often the enemy of increasing biodiversity, then wildlife may not benefit as much as it could do. There may be a role for BNEF here in imparting knowledge to new Friends Groups about the known wildlife of their sites and what improvements could best be made in this regard.
- More recognition needs to be given to the importance of gardens, including front gardens in terms of providing habitat and transit corridors for wildlife, not to mention the aesthetic appeal of the Borough. Unfortunately the 'densification' agenda being pursued by Sadiq Khan at the GLA, following the same from Boris Johnson, provides air cover for garden-grabbing. Front gardens continue to be replaced with hard-surfacing, often 100% hard surfacing even where the garden is quite large, which suggests a degree of unwillingness to 'manage' it and not just the ownership of two and more cars. This has a number of negative effects including run-off, increased heat and the degraded visual appearance of whole streets. I have yet to see such a front garden being restored to a predominantly vegetated state despite GiGL, the RHS and the GLA highlighting the issue. Frankly, more weeds in unmanaged gardens would undoubtedly result in a lot more wildlife than 'labour-saving' printed concrete. We are delighted to see that the Council's 'growth strategy', whilst being fundamentally flawed and nothing to do with sustainability, just 'sustained development', at least recognises the land use impact of the tens of thousands of motor vehicles in the Borough. We would like to see Bexley do more to discourage total hard-surfacing of gardens, though we note that it has done a little bit of work on this. Perhaps a 'restored' front garden award in the Ruxley Garden Centre (Bexley) in bloom competition would be in order?
- The high value of allotment sites for wildlife should be properly recognised. This has, in particular, been demonstrated for reptiles and amphibians by my own Council-facilitated survey work. Other Boroughs have designated allotment sites as SINC's. Two attempts to try and get an allotment site so designated in Bexley have been rebuffed, the second resulting in a less than credible claim along the lines of 'oh dear, the surveyor showed up without a key, apparently not even realising they would need one, so could not look around.' It should be said that the site concerned has a demonstrably greater biodiversity value than a number of existing SINC's.

- It is essential that SINC's are given greater protection. The NPPF prioritises concrete to such an extent that all SINC designation appears to confer in the final analysis is some half-baked 'mitigation' when planning permission is fairly inevitably given, resulting in a significant net loss of habitat with no empirical evidence having been presented that biodiversity will be enhanced, let alone protected at current levels. Yet the London Plan says SINC's are a core component of wildlife conservation in London. They certainly should be in Bexley as the only SSSIs we have are the two geological ones. Thus SINC's are our VERY BEST wildlife sites yet because land is finite and in increasingly short supply they are being picked off by 'developers' and the 'growth strategy' even proposes building on the best half of one that is owned by the Council itself. We would ask Bexley Council to work with the GLA and lobby government to get this situation changed so that circumstances have to be far more 'exceptional' before SINC's can be built on (at least where they are all or most of the highest-designated sites in a given area) and there are credible tests of claims that biodiversity will not only not be diminished but that it really will be enhanced if planning permission is granted. Such tests need to be independent of people hired by the developers. People who don't live here, but have repeatedly talked down the value of **\*\*our\*\*** wildlife.
- It is interesting to see the Council seeking to get intelligence of living roofs/walls in the Borough. This would carry more weight if it had greater powers to make them a condition of planning, which it has failed to do even near the Thames where it has a policy calling for them. The planning committee vote in favour of the Roxhill railfreight scheme at Crayford Marshes was very disappointing, including because this revised scheme had ditched the promise of green roofs made in the previous one. Thankfully the London Mayor over-ruled Bexley so at least it has been forced to go to appeal. Living roofs should not, however, be seen as a make-weight for quality ground-level habitat for all those species that do not fly.
- The most effective management for wildlife of our parks and open spaces requires an intimate knowledge of what is there already, as well as what is in surrounding areas and has the potential to colonise and under what conditions. There are areas occupied by relatively rare clovers, for example, that do need frequent 'grazing' by mowers to avoid being swamped by taller plants. There are a number of 'amateur' conservationists in the Borough, associated with BNEF and elsewhere, with a very detailed knowledge of such matters who remain willing to help and advise in this sphere despite the Council abandoning, without explanation, the semi-formal meetings we used to have on biodiversity issues and its repeatedly inadequate and unhelpful responses to awkward but entirely legitimate questions about the contradictions between planning decisions and its stated biodiversity policies. A lot of our wildlife records have yet to be lodged with GiGL, in part because of the amount of time that has had to be spent trying to fight off said hostile planning applications, but in any case, records alone do not provide a management prescription. It is to be hoped that we can work together with new and existing Friends Groups to get a grip on site management plans and start to produce some more up to date documents, within a framework of developing an updated an over-arching BAP (or whatever alternative is now appropriate in the context of the 'UK Post-2010 Biodiversity Framework' (July 2012).

Yours, Chris Rose. BSc (Hons), MSc [zoology].