

# Corporate Biodiversity Strategy 2016-2020 Consultative Draft

Comments from Dr Judith A Webb **24.02.2015**

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I have quite a few roles with relevance to wildlife and diversity within the areas under discussion in this Biodiversity Strategy. These are all listed at the end of this document.

## RESPONSE

### General comments about the document

#### Page 5 under 202 Local Policy.

Box at the bottom, under Cleaner, Greener Oxford.

I don't think biodiversity is actually a key to carbon reduction at all. You can have efficient carbon reduction without any biodiversity. Suggest re-wording.

#### Page 6 Green Spaces strategy 2013-2027.

Last bullet point 'Protection of important and prosaic species in all sites'.

I suggest you reword this to make it more clearly understandable - possibly 'Protection of rare and more common species'. Bluebells at Shotover are common species but are very important to all people who enjoy the site.

#### Page 9 Oxford's biodiversity

This needs updating with our current knowledge of rare habitats and species within the area. Rare fen habitat is found not only in the Lye Valley. Such calcareous fens are also found in Rivermead Nature Park and Chilswell Valley. All three areas are now the focus of a BBOWT Wild Oxford project to bring the fens back to a more favourable condition and extend the areas of high quality fen habitat. Calcareous alkaline fens are currently a habitat of European importance. According to a recent assessment, only 19.1 hectares of the particular type of fen habitat found in the Lye Valley remain in good condition in England and of that 19.1, 1.5 hectares of this high-quality resource are in the Lye Valley fens. The Strategy should acknowledge this, noting the priority of responsibility for the care of this site. Acid, non-calcareous, fenland is also to be found on Shotover.

In fact, why not take a leaf out of the previous publication of the City Council, '**A Nature Conservation Strategy for Oxford**', undated but maybe produced in the late 1990s - no authors listed. This provided a lot of explanations and examples of exactly how important the wildlife areas in Oxford are. This would set the scene for the rest of the strategy document. It would need expanding to cover the areas of Shotover, Brasenose, Chilswell and Raleigh Park, which are outside the city limits yet managed by the City Council.

#### Page 10, The Map of Conservation Target areas and Designated Areas

(a better title might be 'Wildlife Resources in Oxford')

Map 1 on page 10 needs considerable improvement to give a useful picture of the sites of biodiversity value within the city or within the City Council's authority.

All the SLINCS (currently omitted) should be included and different colours or patterns should be used (with a key) to indicate the various grades of sites from SSSI, through LWS down to SLINC. The name of each site should be inserted. It would also be helpful to highlight sites of importance for wildlife, managed by the City Council, that are outside the city limits, i.e. Shotover Hill, Brasenose Woods, Chilswell Valley and Raleigh Park. Those are just the ones outside that I know about, there may be others. TVERC can easily provide the kind of map I describe - they have recently supplied me with a very good one to assist in this response.

Also useful would be a map showing the different types of habitat within the City Council's care. A map in a previous OCC printed document about the city's wildlife 'A Nature Conservation Strategy for Oxford' (referred to above) is the kind required here, but it does not cover the areas managed by the city that are outside the city limits. The map is Fig 1, after page 22, title 'The Wildlife Resource of Oxford'. It shows all the habitat types. The inclusion of a similar map in this current strategy would be a great help in understanding the quantity and quality of the city's 'Natural Assets'.

### Page 11 Strategy Vision 5.1

A strategic vision that values ecosystems and biodiversity merely as amenities that can be 'enjoyed by the city's residents seems to me somewhat narrow and short-sighted. The immediate benefits to health and well-being offered by access to green space and wildlife, and the importance of conserving rare species for the enjoyment of later generations, are undisputed. However, the complexity of the natural world is such that it is impossible to know today what species might be of significant importance in the future, perhaps in relation to new drugs and also to other areas of scientific research. These 'helpful' species may not be among the most 'glamorous', so **biodiversity must be preserved for its own sake** and we should be very careful when deciding what merits protection.\*

\* Note:

Researchers at Newcastle University combined venom from the Australian funnel-web spider and lectin from snowdrops to create a "bio-pesticide". Telegraph article, [4 June 2014](#)

Inspired by leaves of the Nasturtium plant, engineers at MIT Boston, USA, created what is claimed to be 'the most waterproof material ever'. BBC News article [21 November 2013](#).

A primitive eel-shaped creature could offer the textile industry an alternative to synthetic fibres made from oil. BBC News article [2 April 2013](#)

### Page 12

Mention is made here of a hedgehog management plan for the Florence Park area in a way that implies it is a City Council initiative. Although the Council has given its support to facilitate this plan, it is likely that without the dedication and dynamism of hedgehog champion Hugh Warwick, who lives near Florence Park, it would not have happened. Hugh Warwick should therefore be given credit for this initiative.

## Questionnaire – Answers

### Q 1. Is having a Corporate Biodiversity Strategy important?

Yes, certainly, a Biodiversity Strategy is important in a city with such a wealth of wildlife as Oxford – already a 'World Class' city for its biodiversity. The big challenge is *keeping* it World Class for Biodiversity in the face of pressure to have further urban development, as well as diminishing resources for management of all the sites for which the city has a duty of care. I fear it will be an enormous struggle in the future just to keep what we have today.

One big problem is the **lack of any comprehensive knowledge of the total biodiversity** either of sites within the city area or those outside the city limits that are managed by the City Council. If we don't even know what we have today, how can we plan for 'no net loss of biodiversity' over the period 2015-2020?

The current title implies a wrong emphasis, in my view. '**City Strategy**' would be better than 'Corporate Strategy'. It needs to be something that is actually meaningful for the city and a 'City Strategy' title would imply this.

## **Q 2. Do I think the level of action proposed in the strategy is appropriate? (Response to the bullets in Annex 1, page 21)**

Many of the proposed actions seem to me **very aspirational** given the stated limited resources. Is it really worth setting things down as proposed actions, if they are going to be practically impossible to deliver? I would be happier, if some of the proposals were more realistic and therefore had a greater chance of materialising. If the aims are not achievable, the document risks losing credibility and being simply an expression of wishful thinking.

### **Environmental Development p21**

#### **A. Biodiversity Champions Scheme.**

I don't see how a person can be a 'biodiversity champion' and a 'central source of knowledge, advice and staff engagement' (6.2 page 13) and, very importantly, **give advice** unless they are a **biodiversity expert**. It takes a long time and much studying to become a biodiversity expert and even then the expertise gained is likely to be only in a limited area of organisms e.g. birds or plants or mammals or insects. The likelihood of people in the Council's various service areas (other than the Countryside Service) being 'biodiversity experts' alongside their normal skill set seems slim. Do you need to be an expert to be a 'champion'? I would argue that you do, if you are to be in a position of power - giving advice on actions which will affect wildlife.

#### **B. Incorporation of biodiversity into staff training programmes, so that clear guidance is available.**

If the biodiversity champions are to be trained, who will do the training and how will it be funded? If BBOWT is called upon to supply training on a voluntary basis, there may be a shortfall in the skill set required to cover the various needs of invertebrates, fungi and to some extent vascular plants. People cannot be experts in every group. Biodiversity is just too vast.

#### **C. Bat and bird boxes, green roofs and walls.**

These man-made substitutes of green roofs, green walls, bird boxes and bat boxes are, at best, temporary solutions to retaining some biodiversity and are therefore, I feel, inappropriate as part of a Bio-diversity Strategy. Green roofs are not very good at **providing new habitat for urban wildlife**' (as stated in box bottom of page 8 and relevant to bullet 7 under 6.2 page 13). The most frequent type of green roof utilizes varieties of drought-resistant species such as stonecrops, which provide a little nectar and pollen for insects over a short time each year but are of little benefit to biodiversity during the rest of the year, although they might look good and have other useful functions. If this type of roof is offered as a means of increasing or retaining biodiversity (and without giving the unfortunate appearance of 'green-wash'), an active management plan with firm commitments will be required to maintain it, repair it and ensure its full usefulness in perpetuity. (As a former teacher, I would be interested to know how exactly a green roof can 'provide educational opportunities' - Box, bottom of page 8).

Unless these incremental measures are embedded in a sustainable management system, they cannot contribute to justifiable reasons for allowing development. Bat and swift boxes (see box, page 13, bullet 8 under 6.2, page 13) will only work to attract breeding animals if there are sufficiently diverse green areas left nearby to provide an abundance of the insects both types of wildlife need for food. Conservation strategy needs to focus on the **whole life cycle needs of the species concerned**, not just on providing something visible that *appears* to address a need for mitigation.

How can one ensure that future residents who move into a house with bat or swift boxes installed do not remove them or block them up, if they are not keen on wildlife?

## Leisure, Parks and Communities p21

### A. Bee Action Plan for Oxford (bullet 7 and box, page 14)

Nationally, all pollinators, which include such species as flies, butterflies, moths, beetles, sawflies, are in decline. A recent study carried out by Professor Jane Memmett of the University of Bristol showed that **67% of all pollination was by flies** and only 33% by all other pollinators, including bees. We don't just need a bee action plan – we need a plan that helps *all* insect pollinators. Any **changes made to the planting of flowers in parks need to be to types that provide food for all sorts of pollinators, not just bees**. Also, merely changing planting is not enough. The action plan needs to consider the **breeding needs of pollinators as well as food**. I suggest changing the title to 'Pollinator Action Plan'.

### B. Planting schemes favouring native species and those that are climate resistant

(Bullet 2, page 21)

This sounds good but it needs to be done with great care to ensure that it **also favours biodiversity, given that this is the aim of this strategy**. There are plenty of ground-cover, drought-tolerant, climate-change-resilient, low-maintenance, native species that could be planted (ornamental grasses, prostrate conifers, ground cover ivy) that contribute nothing whatsoever to the natural biodiversity of animals and would certainly be just a barren wasteland for any pollinators that the council wants to encourage. There needs to be some joined-up thinking between the actions in bullet 2 and those in bullet 7).

### C. Expanding the volunteering programmes in nature reserves and countryside parks.

Free labour sounds an attractive option but it would require a concomitant **increase in skilled council staff time** for the coordination of the volunteers. Furthermore, a volunteer force is an unreliable quantity and definitely needs appropriate supervision and direction.

## Direct Services p22

(It would be helpful to explain that this refers to the commercial division of the City Council)

### A. Council Planting schemes favouring native species that are climate resilient (Bullet 4).

As I have explained above, climate-change-resilient plantings **all too often do absolutely nothing for biodiversity**. This statement needs to be changed to indicate that the resilient species chosen will be ones that also favour biodiversity.

### B. Road verge cutting for the benefit of biodiversity.

This usually means suspending cutting for the peak plant flowering time to benefit plant diversity and the breeding and feeding of insects, which, of course, is not possible, where essential sight-lines have to be kept short. Verges to be left long would have to be chosen with care and expert advice. The cutting and removing of long grass after flowering is essential to maintain plant biodiversity. Less frequent mowing might save staff time but cut-and-collect will need different machinery – how will this be achieved?

### C. Identifying underused/undevelopable Council land and identifying opportunities for biodiversity provision (bullet point 5)

In principle, I applaud this action but hope it does not mean that biodiversity is only to be fostered on areas of undevelopable land that is, for example, too contaminated for housing or regularly floods. It is difficult to believe that on any area not in those two categories provision for biodiversity would take priority over squeezing in a few more houses.

## City Development p22

### A. Technical advice note on biodiversity to developers (bullet 1)

This is very welcome but I would have preferred it to contain some measures that developers could implement that really would help wildlife biodiversity **in perpetuity**, rather than reiterating the options of 'bat boxes, bird boxes, green roofs and walls' as quick and easy fixes for developers. (See my full explanation under Environmental Development, Section C, above.)

**'Biodiversity Offsetting' is not proven yet, so only in exceptional circumstances should it be suggested.**

### B. 'Continue to support' evidence base managed by TVERC (bullet 2)

This sounds good, but the reality is far different. How exactly will the City Council provide support? TVERC is unable to maintain an accurate up-to-date evidence base for biodiversity of Oxford city sites due to lack of appropriate biodiversity surveys in city sites and lack of TVERC staff time for inputting survey data of any sort. The back-log of records waiting to be put into the database at TVERC is very long. How will the city's support help with this problem, seeing as no funds are likely to be available from the City Council to provide more staff time at TVERC for inputting data? This also applies to Bullet 3 - 'sharing ecological surveys submitted through the planning system with TVERC'. Sharing surveys will be of no help, if TVERC has insufficient paid staff, as only a limited number of volunteers can be given the responsibility of inputting such data.

### C. Bat and bird boxes and green roofs and walls (bullet 8)

Bat and swift boxes will only work to attract breeding animals if there are sufficiently diverse green areas left nearby to provide an abundance of the insects that both types of wildlife need for food. Conservation strategy needs to focus on the **whole life cycle needs of the species concerned**, not just on providing something visible that *appears* to address a need for mitigation. How can one ensure that future residents who move into a house with bat or swift boxes installed will not remove them or block them up, if they are not keen on wildlife? Quick temporary fixes should not be allowed as mitigation for any development or as a substitute for more long-term measures that truly benefit biodiversity. Instead, the focus should be on raising awareness in local people, businesses and organisations, of measures that will truly benefit biodiversity.

### D. Tree strategy for trees in the city (bullet 9 page 23)

A good idea and it would be worth stating that **this strategy will be addressing climate-change resilience** (through drought tolerance of planted species) and planting trees resilient to emerging devastating tree diseases such as **Chalara**, which will kill ash. Planting of more native species to benefit pollinators, such as all sorts of limes, should be a priority when replacing any dying trees.

### E. Undertaking a comprehensive assessment of our biodiversity resource in preparation for the review of the Core Strategy

I don't know what to say about this. It is an aim that is so far beyond what seems actually achievable with limited resources, that I am stumped.

As a voluntary biodiversity surveyor for many of the city's wildlife sites I know what an enormous job a comprehensive assessment would be. But of course a **comprehensive assessment of biodiversity is exactly what should happen**. Where are the paid biodiversity experts going out annually to record on all city sites and advise on the state of this natural asset? Only experts can do this work. Currently the city relies on very old data, surveys connected to development and ad hoc surveys by various volunteer individuals and groups (such as the Ashmolean Natural History Society of Oxfordshire's Rare Plants Group (now Oxfordshire Flora Group) and BBOWT. This gives patchy and often very out of date coverage.

It may seem that all the rare and important species under the City Council's care are already known. But this is very far from the truth. In my role as occasional voluntary biodiversity surveyor of city sites I regularly discover species of note and of conservation concern that had never been found there

before. **If species have never been identified, site management cannot take account of them and their loss cannot be mitigated.**

The Oxfordshire Flora Group is producing a Rare Plants Register (RPR) for the county (plants that have so declined they are found in less than 10 sites county wide) and is also now noting the discovery in the county of species of high conservation concern in the New Vascular Plant Red List for England.

With regard to rare plants within the City Council management areas, Oxford (including the sites just outside the limits that are managed by the City Council) has approximately **61 RPR species**, which is approximately **21% of Oxfordshire's rare plant species currently on the register**. The final percentage may be higher. Assessment of additional plants on the England Red List has yet to be finalised, but it looks as though there are an additional **16 species** that are now on this England Red List in the city areas. Therefore the total of plants of conservation concern within the city areas is **around 77 species**. This is just one example of the extent of the responsibility – the Council has to know where all these plants are, manage appropriately for their care and halt any further decline.

**I think it would be better if this section on assessment were redrafted to indicate a more achievable aim. The alternative is to provide more funding for the surveys you say are needed.**

## **Housing and Property p 23**

### **A. Considering biodiversity in the early stages of any new build or regeneration development and bird and bat boxes (bullets 3 & 4)**

I am very pleased to see considering biodiversity in the early stages of the planning process put forward as an action but sad to see that the only thing suggested is, once again, the temporary and doubtfully useful to biodiversity example of green walls/roofs and the temporary measures of bird and bat boxes (see comment under Environmental Development C.) Measures that truly benefit biodiversity are needed, rather than temporary quick-fixes.

### **B. Under-used and undevelopable land**

In principle, I applaud this action but hope it does not mean that biodiversity is only to be fostered on areas of undevelopable land that is, for example, too contaminated for housing or regularly floods. It is difficult to believe that on any area not in those two categories provision for biodiversity would take priority over squeezing in a few more houses.

## **Q 3. Do I have any ideas for improvements to the Council's service delivery for the benefit of biodiversity?**

It is difficult to think of how the service delivery could be improved without putting more resources (manpower and money) into the Countryside Service. If that is truly impossible, then I have no suggestions.

**If there can be slightly more input into the Countryside Service** (currently there are only 4.5 staff on the ground who actually do all the practical management of the 29 sites and over 1,000 acres including 12 SSSIs or parts of them, one SAC and numerous LWS and SLINC sites) then I do have some suggestions. Sometimes it will merely be a matter of doing things differently rather than providing more money:

- Transfer resources from unnecessary management, eg continual mowing of some parks. Review green public access sites – could a longer time be left between mowings to benefit biodiversity and still allow public walking and recreation? What about sections of South Park that are not needed for sport or events?

- Identify high conservation value sites, direct more resources towards them and save on other low value sites.
- Think long term not short term: control scrub on wildlife meadow sites before it grows into full-sized trees, which are very expensive to remove.
- By directing resources towards saving species now you will save money in the future, as there will be no need to 'bring them back' by extensive and expensive works.
- Consider joining forces with other organisations to manage sites – for example, forming a working relationship with the Oxford Golf Club for joint management of the SSSI and LWS areas in the Lye Valley under their care. Maybe the club has some spare worker time in the winter that they could allocate to help.

However, it is clear to me that **more manpower for all sorts of management** really is necessary. One example is the essential hay meadow management of mowing of **long grass/wildflower areas. (An increase in the number of these areas is suggested as a part of the City's Pollinator Action Plan/Strategy).**

- **More efficient and flexible machinery** purchased for the above extra work and more appropriate cutting management would help. Smaller, more manoeuvrable, machinery such as a small **forage harvester** is needed for cutting and collecting in all those odd corners that are being left long for the benefit of bees and butterflies. Without a cut and hay collect **at the right time of year**, floristic diversity declines in such meadow areas and they are no longer useful nectar and pollen sources for insects. This includes, for example, being able to easily carry out a cut and collect on Dean's Ham, which is a recently identified relic floodplain meadow with valuable flora. It has been managed incorrectly for many years due to the difficulty of access with the large Rytec mower the Council currently uses. Many sites would benefit floristically from two cut and collect operations in a year, not just one. This management very effectively mimics the traditional hay meadow management locally of a cut and collect in July followed by 6 weeks of 'aftermath grazing' by cows or horses from September in the autumn. If two cuts are not possible, rank grasses can come to dominance on the richer soils.
- It should be borne in mind that NOX pollution is so high over most of the city area that the N-enrichment is equivalent to everywhere having a single spray of manure once a year as would happen on farms. Wild flowers thrive in a low N soil, not a high N one. This air pollution acts to reverse the floristic diversity that is needed. The way to combat this air pollution enrichment is to carry out **two** cut and collect operations on meadow areas each year. Nutrients are lowered by the removal of N in the collected green hay arisings.

#### **Q 4. What role do I see the council playing in biodiversity protection and enhancement in the future?**

**I would like to see ALL rare species flagged up and have special consideration in the management plans for each of the sites managed by the City Council.** Without such an audit, threats to the survival of rare species cannot be identified, action to save them cannot be put in place and neither can mitigation of their loss be arranged. Biodiversity Offsetting can only be used to preserve biodiversity, if what is to be protected has been identified, and this includes the 'invisible' wildlife of insects and fungi, which most surveys do not cover.

**The Council should ask all voluntary organisations who record species within City Council management areas for information on the rare species, where they are and what management they need,** then allocate priorities for the limited resources that are available. Without this audit, wrong decisions on areas for development may be made (important species may be lost) and scarce resources may be wasted on low priority sites. The Rare Plants Group (now Oxfordshire Flora Group) is almost in a position to tell the City Council exactly what resources of rare plant species they have under their care. Plants are on the register because they have declining

populations and there are **several rare plants with either their only county location, or the majority of their population, within the city limits.**

As Recorder for the **Fungus Survey of Oxfordshire (FSO)** I can tell the City Council what rare fungi have been found in the area and the exact locations within city sites.

Wouldn't it be wonderful if the **hedgehog management strategy** trialled in Florence Park could be rolled out as a city-wide initiative of the Council? Hedgehog populations need more than just the Florence Park area to thrive. There's a target!

Since **Brown Hairstreaks** are a rare butterfly species that has invaded the city and is the one really good wildlife success story, how about a 'Brown Hairstreak targeted management plan' for the city, in which the resource of essential blackthorn is assessed and a programme of planting it undertaken (parks, schools ?), as well as a rolling programme of better cutting management to produce the short re-growth of blackthorn in full sun needed for egg laying.

The city has a **tree strategy** that ensures plenty of disease resistant attractive trees that are of benefit to wildlife.

The **Pollinator Action Plan** should be a city-wide scheme with plantings in all formal parks and better management of the wildlife parks to promote an increase in nectar and pollen-providing flowers, plus the provision of areas for pollinator breeding so they can complete life cycles.

Improvement to **the air quality** (pollution is caused mostly by vehicle exhausts) is important not only to the health of people but to plants and biodiversity throughout the city – this needs to be recognised and stated in the strategy. Reduction in NOX will benefit biodiversity as well as people. NOX deposition stimulates rank grass growth on all verges and therefore works against initiatives to make them more floristically diverse and of greater use to pollinators.

Hydrology is a critical issue for the survival of important wildlife biodiversity and for the reduction of flooding to people's homes and businesses. I find it remarkable that the strategy hardly mentions it at all. The impact of **water catchment and disposal** will depend very much on the porosity of the land (including developed sites), planting and the surface water drainage system.

For example, the management of water in existing properties in Headington and Wood Farm is crucial to the Lye Valley SSSI/LWS fenland, which uses these residential areas falling within its catchment for spring-water supply. The brook also suffers from damaging erosion in times of heavy rainfall, as the current urban drainage system channels water quickly into this valley. This could be mitigated in three ways:

- by enforcing a requirement that new-build properties have soak-aways and water butts at the planning stage;
- by seeking to minimise concrete and asphalt covering of the landscape and, where appropriate, remove existing but unused concrete cover and making the areas more permeable. Residents should be given the incentive to install water butts for their houses and Oxford City Council should change the surface water drainage system of its houses and blocks of flats to soak-aways. If these measures are undertaken, water drainage through the Lye Valley will be slowed down and be more similar to its natural ebbs and flows, protecting biodiversity by reducing erosion. This would also slow down water flow at lower levels in the catchment, helping to reduce flooding in the Florence Park/Campbell Road areas.
- Given the flooding problems the city faces (likely to get worse with climate change) and the potential to retain and slow the flows of flood water through judicious planting, a major part of the Strategy should focus on identifying measures that would help biodiversity and could be complementary to or part of an alternative to major constructions such as a western conveyance/Oxford flood relief channel.

**Dr. Judith A Webb – current roles connected with wildlife/biodiversity in Oxford City:**

- Member of Oxford City Council's [Pollinator Advisory Group](#)
- Member of the Floodplain Meadows Study Group of the Ashmolean Natural History Society of Oxfordshire
- Member of [The Oxfordshire Flora Group](#) (formerly Rare Plants Group) of the Ashmolean Natural History Society of Oxfordshire, and 'Flora Guardian' for Creeping Marshwort on Port Meadow and Greater Water Parsnip in Marston Meadows.
- Contracted Reporting Ecologist for the [Wild Oxford Project](#) - Lye Valley, Chilswell Valley, Rivermead Nature Park (Rosehill)
- Chairman of [Friends of Lye Valley](#)
- Species Recorder for the Fungus Survey of Oxfordshire (FSO) Group
- Voluntary Species Recorder for [TVERC](#) on Local Wildlife Sites
- Voluntary Species Recorder for Oxford Countryside Service on selected parks and nature parks
- Records Officer and committee member, [New Marston Wildlife Group](#) (Friends of [Milham Ford Nature Park](#))

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