



Help us make the RBWM Environment and Climate Strategy workable

Thanks for offering to comment on the RBWM draft Environment and Climate Strategy. Comments are requested via the Council’s Consultation Portal [here](#): you can access a copy of the draft Strategy via the Portal. You will be asked for your views on each of the areas covered by the draft strategy, and there is a general ‘free comment’ box at the end of the questionnaire (Q15). There’s a lot of information and suggestions here but don’t panic! Do what you can. It’s important that the Council knows that there are people concerned about the Climate Emergency so any feedback to the Council is helpful. If you are really pressed for time use the email addresses below to send in your main comments.

The six ‘Wild’ groups in the Borough (covering Ascot, Cookham, Datchet, Eton/Eton Wick, Maidenhead and Windsor) have focussed on the strategy under the Natural Environment heading. We have identified what we believe are the key issues and aspects that are not addressed adequately. For the Natural Environment the main discussion is on pages 24 and 30 of the draft Strategy. If you register with the Portal and you submit your comments there, they will automatically be registered by the Council. This is the Council’s preferred method of responding. We recognise, however, that it is not easy to match comments to the format of the questionnaire so we hope that the Council will also consider comments emailed to ClimateChange.Consultation@RBWM.gov.uk, especially if they are copied to Cllr.johnson@rbwm.gov.uk (Council leader), Cllr.stimson@rbwm.gov.uk (Lead Councillor for the Emergency and related activities) and duncan.sharkey@rbwm.gov.uk (chief executive).

Feel free to use the background and suggestions below as you see fit in replying to the Council’s consultation. We have provided some background comments and then a few specific suggestions/actions you might want to include in your submission. If you have queries you can contact one of the Wild groups below:

Ascot Wildlife: ascot.wildlife@gmail.com
 WildCookham: wildcookham@gmail.com
 Wild About Datchet:
wildaboutdatchet@gmail.com

Wild Eton & Eton Wick: wildeandew@gmail.com
 Wild Maidenhead: wildmaidenhead@gmail.com
 Wild Windsor: shearersj@btinternet.com

So how can we improve the current draft Strategy? Our comments focus on the Plan set out on page 30 of the draft Strategy - sections 4.7 and 4.8. We have made an attempt to link some comments to specific questions. It's not easy and we suggest that you put your comments in wherever you see fit: the Council will have to take notice of them. Many of your comments could go in the final open-ended Question 15.

1. Bring forward the target date for net zero carbon (Consultation Question 1)

The six wildlife groups support the call for an earlier date to protect wildlife and preserve our ecosystem.

- ***Call for the target date for net zero carbon to 2035 at the latest***
- ***Point to recent national Climate Assembly which put 'protect nature' as one of the top priorities***

2. We must be more ambitious in our targets (Question 7f)

The Council targets a 10% in biodiversity net gain and limits even this gain to that obtainable through the planning system - ie only a very small proportion of local land will have any biodiversity targets applied to them. This is totally inadequate for the task. The metrics applied by the Council need to be Borough-wide and plans must be put in place to engage with the broader community if we are to get close to achieving any meaningful habitat and species enhancement. Other targets (eg for increasing wild flowers in roadside verges, for exploiting existing Local Wildlife Sites, for training, for local awareness) show very little sense of energy or ambition.

- ***Call on the Council to develop a strategy that addresses all land in the Borough with plans to work with landowners to achieve biodiversity net gain across all areas, not just those opportunities that appear through the planning process (Question 7)***
- ***Tell our Councillors they need to be far more ambitious. Point to achievements so far (eg renewable energy supply for Borough offices, a start on roadside verges). Urge them to find some quick wins that would set an example (could mention opportunities close to you and/or the great opportunity with Battlemead to demonstrate commitment to biodiversity and adopt approach of local naturalist groups to this).***

3. We should measure Priority Habitats and Priority Species (Question 3L)

We suggest that the overarching measures of success should be i) 20% increase in area of Priority Habitat by 2023; ii) Increase in range and abundance of Priority Species (those that best demonstrate the health of a habitat) that were declining in 2020. By targeting an increase in Priority Habitats we have a far greater chance of achieving the biodiversity gains coming from such increase. These Priority Habitats are mapped and monitored by Natural England and our

local Environmental Records Centre, TVERC, and so provide a sound basis for measuring borough-wide, as opposed to planning system, success.

- ***Call on the Council to focus on Priority Habitats, coupled with targets for priority species, as the best vehicle to deliver biodiversity net gain.***
- ***Request that these sites are effectively monitored to ensure they all achieve net biodiversity gain.***

4. The starting point for action (Table, page 30) should be an RBWM-supported borough-wide five-year rolling programme of biodiversity action plans (Question 3f)

Local biodiversity action plans, geared to specific local environments, are needed, as part of an overall Borough-wide plan. We need to ensure that up to date biodiversity data is available and used appropriately. Lack of resources should not be used as a reason for RBWM not to take a key coordinating, supporting and leadership role in this: the six Wild groups of RBWM have the skills and knowledge to help deliver.

- ***Call on the Council to engage much more proactively with local environmental groups to develop and implement local biodiversity action plans. Suggest getting their support to conduct species and habitat surveys, write wildlife conservation management plans, run conservation work parties***
- ***Call for the creation of a Biodiversity Specialist group involving the Council, environmental groups and local experts***
- ***Urge a review of priority species records by January 2021, including the 128 priority species noted by Wild Maidenhead's Maidenhead's Nature Matters report***
- ***Suggest that a service level agreement is put in place with TVERC (Thames Valley Environmental Records Centre) to ensure up to date ecological data is provided to help inform planning decisions and to enable the Council to report annually on its biodiversity performance***

5. Save our Local Wildlife Sites (Question 15)

Central to such a plan should be our network of 100+ Local Wildlife Sites (LWS) with a target that all RBWM-owned Local Wildlife Sites will have active management plans (with the proportion of all LWS having active management plans increasing to 80% by 2022).

- ***Urge that all Local Wildlife Sites (LWS) are positively managed to conserve and enhance the site in line with the the criteria set for them and are surveyed at least every five years.***

6. The Council must move further and faster in adapting its own green spaces (Question 15)

We need to increase and diversify wildlife interest in green spaces and provide access to sites of wildlife interest for all sections of the community. This includes promoting accessibility to wildlife by creating new habitats in public areas and encouraging their creation in private areas such as schools and Council-owned places of work.

- ***Call for a Pollinator Action Plan for RBWM in partnership with local environmental bodies to help deliver the [Buglife B-Lines](#) initiative locally***

- ***Build on the work done in Ascot (and many other Councils around the country) to create wildlife corridors. Provide some resources to local groups to make these happen***
- ***Demand that the Council modifies management of selected green spaces to encourage wildflowers, using native wild-flower seeds/ plants to further enhance grassland as required.***
- ***State that the draft Strategy plan for roadside verge mowing is totally insufficient, that they need to move immediately to a more wildlife-friendly regime. The 2024 target proposed for a limited number of verges is not soon enough.***

7. Make carbon capture and storage a key part of the Strategy (Question 4)

The draft Strategy makes no mention of carbon capture from the air by trees, plants and soils, a key component of any climate management plan. The Natural Environment plays a massive role in this and it needs to be reflected in the Plan. Links between Priority Habitats and carbon storage and sequestration in the Borough exist (TVERC July 2020) and provide a basis for an appropriate strategy.

- ***Call on the Council to recognise that the natural environment has a key role to play in capturing and storing carbon and other emissions and to set targets and programmes that reflect this***
- ***Urge them to use available data to identify where best to focus efforts to maximise land use for capture and storage and where changes in land use must be avoided.***

8. Speed up training programmes - give officers the skills they need to protect wildlife (Question 15)

The timing for such key actions as biodiversity/natural environment training and awareness training for Council employees and partners is woefully inadequate. This needs to be accelerated so that, for instance, planning officers, a key part of any attempt to achieve biodiversity net gain through the planning process, have received appropriate training by the end of 2021 at the latest. Such speeding up seems necessary right across the draft Strategy. For instance how can it take five years from the declaration of the Emergency to implement a new roadside mowing regime?

- ***Call for the Council to move much faster and to be much more proactive in seeking help from local groups to drive the Emergency programme***
- ***Urge the Council to accelerate the change in its roadside mowing regime: at least half the length of all RBWM's road verges to be managed for wildflowers by 2024. And at least 10% of public parks to be managed for wildlife by 2025***
- ***Bring forward the timetable for training planning officers and biodiversity/environment awareness training for all officers - to complete by end 2021***

9. Don't reinvent the wheel (Question 15)

To address these concerns, and to address structural flaws in the draft, the six Wild groups of RBWM have looked for alternative existing approaches from other English Councils including Dorset, Devon, Nottingham, Peterborough and Warwickshire. We have also noted the studies into the behavioural aspects - how our Council can win the active support and engagement of the local population for a massive change in the way we live our lives. As a separate

contribution we have used Peterborough City Council's strategy as an example of a well structured and effective approach to objectives and actions and are submitting this to the Council. You can see it [here](#).

- ***Call on the Council to look more closely at best practice to short-cut much of the process***
- ***Urge them to review the way they use Objectives, Actions and Measures of Success to define their programmes and find a more effective way to link strategy to specific objectives and the programmes and actions needed to achieve them.***
- ***Suggest that the Council raises the role of public communications and engagement to a major component of the strategy, rather than a supporting tactic for each activity (Question 8)***

12th September 2020