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***“A human being is a part of the whole, called by us 'universe', a part limited in time and space. We experience ourselves, our thoughts and feelings as something separate from the rest – a kind of optical delusion of consciousness. Our task must be to free ourselves from this prison by widening our circle of compassion to embrace all living creatures, and the whole of nature in its beauty.”***

Albert Einstein, quoted in 'What will it take? A deeper approach to nature conservation', Iain Scott, 1999. HPT Books.

COPY

## BRIGHTON AND HOVE LOCAL BIODIVERSITY ACTION PLAN

Thank you for sending the draft of this LBAP and subsequent paper version, which was significantly different to the previous digital version.

1. This is not so much an 'Action Plan' as a series of tasks copied over from other unstated documents. There is no strategic context provided. No aim, no objectives, no monitoring schedule and no review mechanism is proposed. The residents, businesses and wildlife across Brighton and Hove deserve so much more than this.
2. It is unclear who is to be involved, why they should be involved, or how they can be involved in progressing Local Biodiversity Actions. This is the fundamental weakness in this 'Local Biodiversity Action Plan' approach and needs to be addressed professionally.
3. ***Eco-Logically*** provides support for all work which improves both our local area, and our knowledge of the natural environment. Detailed comments on this document are provided below, but firstly it is worth reminding ourselves of the context.

### Building more is not Development

4. 'Old paradigm' of build infrastructure, build houses, build flats, build workspaces, build, build, build is alive and kicking. This is the *Status quo*, which the council claimed it did not wish to see any more in an infamous promotion recently.
5. In sustainable development we could pay attention to the developing aspect. This cannot mean just building more to consume more to cater for more population. Where is the sustainability in providing more, more, more? The council could consider promoting the

other aspects of developing. It can develop understanding, knowledge, wisdom, beauty and a higher quality of life under its sustainability remit. These aspects will have only modest costs, yet profit us all with greater returns in health, happiness and well-being.

6. Brighton and Hove used to be a beautiful and fascinating area to live attracting artists and aspirational groups alike. Over the past decade it is being turned into somewhere resembling East Croydon with concrete and glass tower blocks dominating the cityscape.
7. The remaining fragments of green space will be increasingly threatened by the council planning section's lust for building, without the development that benefits all living across the city. Even countryside land outside the 'built up area boundary' is now termed 'urban fringe' and likely to be ripe for commercial exploitation before the National Park boundary is reached.

### Sustainability foundations

8. One of the foundations for sustainability is a healthy natural environment.
9. However all the council's attention is devoted to the other two foundations; economic growth and social well-being. Why do these two areas receive disproportionate attention whilst the natural environment is left to languish? A previous version of the LDF Core Strategy even referred to the natural environment as a 'constraint on development'. In fact they meant a constraint on building, the biodiversity capital provides a superb resource for developing our city's well-being. Nature provides us with opportunities locally, not constraints!
10. Amongst the main formal mechanisms for developing the natural environment are Biodiversity Action Plans (BAPs), originally envisaged at the 1991 'Earth Summit' on Sustainable Development.
11. These BAPs are not supposed to be secretive, complex documents only available to a select audience with the wit to understand them. Instead these should be inspiring Plans which engage across all sectors and provide shared objectives and actions on which we can all collaborate.
12. For a couple of years there was a working group looking at drafting a Local BAP for Brighton and Hove. Many specialists provided an input to the habitats and species most appropriate to the LBAP, based on the national UKBAP criteria.
13. The report published in 2003 also described how the various BAP partnerships cascaded information. It provided recommendations for involving local people and businesses in an 'on-line' live database and action framework to set and monitor progress on the Local BAP. However this hard work was never constructively supported by the council and the working group dissolved. A great opportunity lost.
14. More recently the council has focused all its attention on a funding bid to UNESCO seeking the label 'Biosphere Reserve'. A conference was even held in 2008 with a follow-up event in 2010 to raise enthusiasm for the application bid. No mention was made of the council's formal 'Biodiversity Duty', which does have a statutory basis. There was no discussion of the Local BAP and how this was progressing.

15. With the desire for the UNESCO award gobbling up all the council's resources it is not surprising that the LBAP languished, only to suddenly appear as a draft preparatory document in mid-March 2011, with a comments deadline of less than a fortnight. UNESCO will have expected applicants to provide a clear and agreed LBAP with examples of successful outcomes. So far there are very few examples to provide; but the City's demotion on the 'Cities Sustainability Index' indicates efforts need to be redoubled if commitment to the natural environment is to be one example.
16. Biodiversity Action Plans are supposed to be engaging. To include others in their preparation and ownership. The plan itself is important, it provides the strategic overview, objectives and agreed actions which need to be undertaken and monitored. Within Brighton and Hove there is the danger of a plan being produced which never sees daylight and remains hidden on a council computer-server, only a 'box-ticked' to prove it ever existed.
17. It is equally important that the 'process' for producing the Local BAP is agreed by the sectors with the main influence on biodiversity across the city. There needs to be wide cross-sector engagement in preparing the LBAP if it is to fulfil its true purpose.
18. Across England there are many excellent examples of Local BAPs being produced and implemented by local biodiversity partnerships. Often their local authority has taken the lead in bringing the different sectors together, as recommended by the 'Association of Local Government Ecologists' (ALGE) in their position statement which welcomes the "...identification of local authorities...to provide a lead for the Local Biodiversity Action Plan (LBAP) process" It is worrying that Brighton and Hove City Council seems to have very little interest in such partnerships.
19. Indeed, it is notable that the council's own web-site does not even mention the Sussex Biodiversity Partnership. Does this indicate the lack of interest in Local Biodiversity, when the UNESCO prize is so much more alluring?

### Recommendations

We recommend that;

21. **The council engages with all sectors in preparing the Local BAP.**
22. **Jointly set and agree OBJECTIVES and TARGETS through open collaboration; not having these simply imposed by the council.**
23. **Appoint an overall 'Biodiversity Project Manager'. Perhaps an elected council member supported by a Senior officer with sufficient project management experience.**
24. **Clarify the mechanism for involvement by all sectors toward ACTION on the agreed objectives.**
25. **Provide an Action and Reporting mechanism (to monitor implementation once started in the mechanism mentioned in the previous point).**

## Consultation response

26. Previously we have provided very detailed responses based on careful analysis of the proposed strategy or guidelines. However the details in these responses have been virtually ignored. This has two impacts; firstly, a lack of trust or belief in the council's intentions upon receiving representations. In other words, if the consultation is not the start of a mechanism to engage in meaningful dialogue then it is a pointless brief exchange of opinions which are ignored, resulting in opportunities to fully represent the local communities' interests being lost. Secondly, we learn that it is a waste of time and effort responding to consultations, resulting in further isolation of the council from the community it is meant to represent and support.
27. A good example of the first lost opportunity was the inclusion of many inappropriate species in the council's recommended planting list for biodiversity. Many were from Asian, American and central European biomes and not naturally found within the British Isles biogeography. Despite pleading for the council's plant list to only recommended Sussex flora it was published with invasive species such as the Schedule 9 Virginia creeper *Parthenocissus quinquefolia* included. This makes an ecological mockery of the council's biodiversity duty.
28. For these reasons the key points are provided as simple bullet points below. Each can be elaborated upon and a fuller genuine discussion will be held if required.
29. It is difficult to provide a precise response as two different versions of the 'Brighton & Hove Local Biodiversity Action Plan' document have been received. The paper version appears to have ten more pages and some sections are renumbered from the digital version. As no version number or date are provided it is more difficult to respond and future drafts should each have a clearly dated footer to prevent this problem recurring.

## Inspiration

30. There is no overriding reason why any influential sectors need to view biodiversity positively. The current draft does little to inspire engagement by others and merely refers to statutory processes within the law. This is dull. It does little to reflect the wonder and importance most people attach to nature. The LBAP should start inspirationally:

***“A human being is a part of the whole, called by us 'universe', a part limited in time and space. We experience ourselves, our thoughts and feelings as something separate from the rest – a kind of optical delusion of consciousness. Our task must be to free ourselves from this prison by widening our circle of compassion to embrace all living creatures, and the whole of nature in its beauty.”***

Albert Einstein, quoted in 'What will it take? A deeper approach to nature conservation', Iain Scott, 1999. HPT Books.

OR,

***“The ideology of industrial society, driven by notions about economic growth, ever-rising standards of living, and faith in the technological fix, is in the long run unworkable. In changing our ideas, we have to look forward towards the eventual target of a human society in which populations, use of resources, disposal of waste, and environment are generally in healthy balance.***

***Above all we have to look at life with respect and wonder. We need an ethical system in which the natural world has value not just for human welfare but for and in itself.”***

Sir Crispin Ticknell, 2002, 'The Earth Our Destiny'. Portsmouth Cathedral.

OR,

*“[On]...the central questions of human origins in the wild environment. We do not understand ourselves yet and descend further from heaven's air if we forget how much the natural world means to us. Signals abound that the loss of life's diversity endangers not just the body but the spirit.”*

EO Wilson, 1992 , ‘The Diversity of Life’ . Belknap Press, Harvard.

### Detailed Comments

31. Mention that 2010 was the ‘International Year of Biodiversity’ and indicated the continuing commitment to Biodiversity at the highest levels. 2011 marks the start of the ‘Decade of Biodiversity’.
32. Apart from looking after Local Biodiversity because of the formal Duty there is another reason for caring about nature; its sheer beauty and excitement. Most children know this. We can reconnect with the pleasure and joy that nature has. But beyond the anthropocentric ‘*human-centred me...me...me...*’ need to **possess** and **consume** there is also an **intrinsic value** within nature. Whilst the LBAP is the core mechanism which can inspire us all in enhancing our local biodiversity, it must not become just another grey dull council document.
33. We can be bold in providing advice and clearly show that the council has responsibilities to manage its biodiversity, and our natural inheritance, wisely. This responsibility is stated in both ‘Biodiversity and your duty of care: A guide for Local Authority Elected Members’ [South East England Biodiversity Forum, 2009]. ‘Conserving Biodiversity – The UK Approach’( 2007) which explicitly mentions the intrinsic ethical and philosophical value within nature:  
*“Because it is wrong to treat nature as if it has been designed for our convenience and abuse. Because it inspires and enriches our lives (aesthetic/spiritual/cultural services). It enriches many people's lives every day. We are uplifted by nature and our spirit is renewed by contact with it. It provides endless motivation for enquiry, from schoolchildren to scientists.”*  
[Source: Box 2, DEFRA, October 2007]
34. Community involvement will be critically important for planning, action and reporting, so ensure:
- **Sufficient web-based resources are provided for all residents, businesses and groups to clearly share and contribute to the LBAP objectives.**
  - **Sufficient web-based resources are provided for all residents, businesses and groups to clearly monitor progress on LBAP objectives.**
35. Section 2: “Local expert naturalists” Who was consulted? How?
36. Section 4: This should be near the start of the LBAP. It is unclear where the aims, objectives and outcomes are stated.

37. Section 4: Why are separate 'action plans' being written? The LBAP is the action plan. These component units for habitats and species deserve a clear title to avoid confusion with the LBAP or other BAPs.
38. Once a Local BAP partnership is established the details for each habitat and species target can be discussed and agreed. Why are they being 'imposed' now? This is no way to foster respectful collaborations.
39. Add a clear reference list of documents and web-sites relevant to Biodiversity in Brighton and Hove.
40. The UKBAP : Add Web-site ref: [www.ukbap.org.uk](http://www.ukbap.org.uk)
41. Add Millennium Development Goals - especially #7, 'Goal 7: Ensure Environmental Sustainability', ref: [www.unmillenniumproject.org](http://www.unmillenniumproject.org)
42. Add Formal status of the Biodiversity Duty for public agencies. Only vaguely referenced in Section 2. Ref: 'Guidance for Local Authorities on Implementing the Biodiversity Duty ' (DEFRA, 2007)
43. Planning Policy Statement 9: 'Biodiversity and Geological Conservation' [PPS9]. PPS9 states that plan policies and planning decisions should be based on up-to-date information.
44. The 'Guide to Good Practice' for PPS9, describes a number of reasons why this information is needed. Add these, including to:
45. Provide the evidence base needed to prepare and measure the implementation of local development frameworks and sustainable community strategies;
46. Ensure a spatial planning approach to the development of local Biodiversity Action Plans;
47. Appraise environmental impacts of development proposals and
48. Inform a strategic and spatially planned approach to the conservation, enhancement and restoration of biodiversity.
49. Add England Biodiversity Strategy, Ref: '*Working with the Grain of Nature: A Biodiversity Strategy for England*'. England Biodiversity Group, 2002.
50. Include desired outcomes from the England Biodiversity Strategy; specifically:
51. Delivery of local and regional biodiversity objectives by strong, inclusive partnerships with a long term vision and stability for the future.
52. Local activity takes place and is complementary to national plans and programmes.
53. Local priorities and targets are informed by national BAP priorities and targets and *vice versa*.
54. Widespread exchange of easily-accessible information, good practice and guidance about local biodiversity activities.
55. An effective means of reporting and monitoring progress.
56. A set of local biodiversity indicators produced to track progress on delivery of the action plan.
57. Biodiversity objectives and targets integrated into Council activities, particularly LDF, Sustainable Community Strategy and recognition of local biodiversity objectives in planning policies.
58. Development of the contribution of local partnerships to the improved communication and understanding of biodiversity.
59. Better understanding of the economic drivers which are causing biodiversity loss.

60. Correction of failures in the local economic free-market and implementation of the 'polluter pays' principle.
61. Recognition of biodiversity as a public good.
62. Decisions reflect the full costs and benefits of biodiversity.
63. Role of biodiversity in local development planning and applications is widely understood and recognised, in a way which contributes to nature conservation and environmental protection.
64. A financial and cultural climate in which funding for biodiversity is encouraged.
65. Increased Board-level recognition of biodiversity as a material business issue.
66. Increase in the number of companies and businesses with biodiversity objectives included in their Corporate Social Responsibility plan.
67. Biodiversity objectives integrated with business management systems to consider all aspects of its activities, products and services, including effects on biodiversity.
68. Increase in the number of local company site-related BAPs making measurable contributions to Local BAP objectives.
69. Identification and promotion of good practice at sectoral and company level.
70. Increase in the number of companies involved in the LBAP partnership, and involved in habitat and species schemes.
71. Widespread adoption of biodiversity reporting mechanism to contribute to Local BAP monitoring and reporting.

#### AGRICULTURE sector

72. The retention and good condition of semi-natural habitats within farming systems.
73. The promotion and reward of appropriate land management techniques that benefit semi-natural habitats.
74. Conservation, management, restoration and creation of habitats to allow biodiversity to thrive.
75. Reverse the losses of farmland biodiversity and the positive management of all farmland features beneficial to biodiversity.
76. A sustained increase in the biodiversity value of agriculturally productive land.

#### WATER AND WETLAND sector

77. Water quality targets developed and met for priority BAP habitats.
78. Water quantity requirements developed and met for condition assessment of relevant SSSIs. Especially abstraction impacts on Downland aquifer.
79. Water and wetland habitat conservation is promoted in all policies, plans and projects controlling water level and flood management activities. Especially local flood impacts.
80. A programme for prevention and management measures for non-native invasive species established and funded.

#### WOODLANDS AND FORESTRY sector

81. Pest issues addressed. Especially Dutch elm disease and Oak dieback.
82. Provision of more advice to Council Development Control and better monitoring of changes resulting from developments and planning applications. Especially Ancient woodland and planning applications.
83. Reduced damaging impacts on woodland from surrounding agricultural practices.
84. Improved consideration of pollution and other indirect impacts on woodland biodiversity.
85. Improved information on state of woodlands, including parklands. Especially Stanmer Park, Preston Park and Hove Park.
86. Increased proportion of woodland under approved management and protection.
87. Guidance on habitat management for woodland, parkland and pasture-woodland.
88. Woodlands and trees complementing other habitats, at a landscape scale, and providing for non-woodland species (eg: rides and glades).
89. Increased high-quality public access to woodland.
90. Increased local involvement in woodlands and biodiversity.

#### TOWNS, CITIES AND DEVELOPMENT sector

91. Biodiversity protection, conservation and enhancement objectives in regeneration guidance. Especially Shoreham Harbour development which involves western sections of Hove and Portslade.
92. New planning legislation and guidance underpinned by sustainable development objectives.
93. Planning obligations linked to positive biodiversity objectives.
94. New developments build in biodiversity and disseminate good practice.
95. Biodiversity conservation and enhancement as an element of brownfield development.
96. Key brownfield biodiversity species conserved through site protection, mitigation and habitat creation.
97. Understanding and acceptance of how brownfields can make a positive contribution to the 'green' elements of urban regeneration.
98. Biodiversity conservation and enhancement objectives are included in planning applications.
99. Natural green spaces and wildlife features are provided as part of planning applications.
100. Biodiversity targets incorporated in house-building and other development schemes.
101. The use of 'Sustainable Urban Drainage Systems' (SUDS) as standard practice for all 'new-build' developments.
102. Green buildings designed and constructed as standard practice for all new-build.

#### MARINE AND COASTAL sector

103. Development of an ecosystem-based approach to maritime and coastal environmental management.
104. Incorporation of biodiversity objectives in flood and coastal defence policy.
105. Delivery of maritime habitat and species action plans.
106. A coherent legal and administrative framework for nature conservation in the marine and coastal environment.
107. Management of alien/invasive species.
108. Targeted research, survey and monitoring to provide the knowledge required for an ecosystem-based approach to management of the marine environment.
109. Increased understanding of climate change impacts on maritime habitats and species.
110. Improved monitoring of water quality on maritime areas.
111. Increased understanding of biodiversity impact from offshore developments. Especially the 'Rampion' project.

#### PARKS AND URBAN GREEN SPACES sector

112. Parks to be managed with biodiversity conservation as a core principle.
113. Large urban parks progress LBAP objectives.
114. Relevant parks and urban green spaces protected and managed as local wildlife sites.
115. Peat-based compost phased out in horticultural departments and use.
116. Pesticide use significantly reduced.
117. Water conservation measures are in place.
118. Ecological skills employed in all LPA parks and landscape teams.
119. Performance indicators for parks linked to biodiversity targets.
120. Residents can access natural greenspace within 300m wherever possible.

#### CEMETERIES AND CHURCHYARD management

121. Cemetery and churchyard management linked to LBAP objectives.
122. Increase in woodland and appropriate environment habitats for burial practices.
123. New cemetery allocation not leading to a loss or damage to important wildlife sites.

#### TRANSPORT CORRIDOR management

124. Transport corridor management linked to BAP objectives. Especially rail routes to Lewes and Hassocks
125. Development along transport corridors does not lead to loss or damage to important wildlife sites.

## GARDENS AND ALLOTMENTS management

126. Continued increase in wildlife gardening and consequent enhancement of biodiversity in urban and suburban areas.
127. Sustainable gardening approaches adopted. Especially gardening for local wildlife species.
128. Increased participation by local residents. Especially 'citizen science' for biodiversity record centre and LBAP monitoring.
129. Key gardens and allotments contributing to habitat mosaic protected through planning policy. Especially adjacent areas recognized in the LDF.
130. Sale of problem exotic plants controlled. Especially through monitoring and advice at garden centres.
131. Greater understanding of the value of gardens for biodiversity at the landscape scale. Especially gardens contributing to the wider habitat mosaic.
132. Dr Thompson in '*No Nettles Required: The truth about wildlife gardening*' writes:

*"...gardens tend to be forgotten. ...since gardens are outside any form of statutory control and it's impossible to know what lives in them. Gardens are a vast resource, but if you don't know what's in them, and you couldn't do anything about it even if you did, you're likely to pretend they don't exist, and that's what the official attitude has been.*

*Gardens are good wildlife habitat in themselves, and they join up to form a giant, interlinked network that clearly doesn't need much help from railways or canals. This emphasis on corridors not only distracts attention from the gardens that surround them but also makes wildlife gardeners who don't have a corridor at the bottom of the garden feel as if they are wasting their time.*

*To sum up, up to a third of the entire UK invertebrate fauna occurred in [...an urban Sheffield] garden. Although it's clear that gardens are already extremely rich in wildlife, and that they can provide a home for perhaps half of Britain's native invertebrates, we also know that much of the potential of gardens as wildlife habitats remains untapped.*

On page 170 he writes about 'Reconnecting with nature'

*Half the world's population lives in towns and cities. In Britain the proportion is more like 90%. For most of us food comes shrink-wrapped from the supermarket and the closest we get to wildlife is a David Attenborough documentary. We are all born with an innate affection for living things ['biophilia'], an instinctive biophilia, which can be either stifled or nurtured by our early experiences.*

*...many children now grow up without forging any close personal bond with their local flora and fauna.*

*What can be done to reconnect people with the natural world? In fact anyone with a garden has their own nature reserve, literally on the doorstep. You can develop a close personal relationship with your wildlife and observe its changing with the seasons."*

## SCHOOL GROUNDS sector

133. Implementation of 'School Grounds BAP' published by the Council in 2004.

### SOCIAL INCLUSION AND IMPROVED QUALITY OF LIFE sector

134. Better local environments for people suffering from deprivation.
135. Local renewal schemes for residential areas and estates to include biodiversity components.
136. Increased provision of trees and greenspace in built environments.
137. Environmental and biodiversity proofing within SEU and NRU remits relevant to Brighton & Hove. Note: 'Social Exclusion Unit' and 'Neighbourhood Renewal Unit' link with '*Accessible Natural Greenspace Standards*' (published by Natural England).

### HEALTH sector

138. Local GPs prescribing walks and conservation activities in local greenspaces.
139. Local biodiversity areas linked to Local Health Trust and Health Action Zone programmes.

### Tackling INVASIVE EXOTIC SPECIES

140. Better information and understanding of managing non-native species.
141. Promotion of locally appropriate species based on biodiversity objectives.
142. Greater understanding of positive biodiversity benefits from non locally-ecological species which are appropriate to local biodiversity objectives.
143. Add Association of Local Government Ecologists guidance on Biodiversity and the LDF. Ref: '*Integrating Biodiversity Into Local Development Frameworks*' (ALGE, 2005). In particular key documents to inform the LDF or DPD relating to biodiversity should lead in:
144. Providing leadership in the community – increasing the profile of biodiversity across the authority's functions.
145. Examining opportunities to integrate biodiversity considerations into all relevant service areas and functions, and taking steps to implement the opportunities identified.
146. Management of local authority land holdings. A compliant authority will manage its own sites in a way that is sensitive to biodiversity.
147. Making efforts to raise awareness of all staff, managers and elected members with regard to biodiversity issues.
148. Demonstrating a commitment and contribution to key local biodiversity initiatives, such as LBAPS and contributing to delivery of outcomes, for BAP listed priority species and habitats and LBAP listed species and habitats, where appropriate.
149. Use of information and data and demonstrating progress against key biodiversity indicators.
150. Progress against any biodiversity indicator included in the local government performance framework.
151. Add reference to the Sustainability Strategy, published by Brighton & Hove City Council (2002) which states the objective: "*To achieve our local targets set out in the Sussex Biodiversity Action Plan*"
152. Refer to the Sussex Urban Habitat Action Plan, 2001, in particular;
153. All householders to enhance the biodiversity of their own gardens.
154. Identify all habitats and species in urban areas that require action.

155. All people to have access to advice, information and training on biodiversity in urban areas.
156. Refer to '**Sussex Biodiversity Opportunity Areas**' identified in 2009. These include;
157. # 32: Brighton and Hove urban green network.
158. # 33: Benfield to Hangleton.
159. # 42: Stanmer and Ditchling Downs.
160. # 43: East Brighton Downs.
161. Habitat: Add Mesotrophic Grassland. Areas of grassland that are not strictly calcareous; examples, Hove Lagoon, *Spiranthes spiralis* grassland near Roedean.
162. Habitat: Add Open standing water. Larger than garden 'ponds'
163. Habitat: Add URBAN GREEN SPACES.
164. Habitat: Add ALLOTMENTS
165. Add Geologically and Geomorphologically important areas, this is specifically included in PPS 9.
166. SPECIES: Add wartbiter cricket *Decticus verrucivorus*, found on the Downs
167. SPECIES: Add adonis blue butterfly *Polyommatus bellargus*.
168. SPECIES: Add cornflower *Centaurea cyanus*.
169. SPECIES: Add narrow-leaved helleborine *Cephalanthera longifolia*.
170. SPECIES: Add basil thyme *Clinopodium acinos*.
171. SPECIES: Add frog orchid *Coeloglossum viride*.
172. SPECIES: Add chalk eyebright *Euphrasia pseudokernerii*.
173. SPECIES: Add red hemp-nettle *Galeopsis angustifolia*.
174. SPECIES: Add early gentian *Gentianella amarella* ssp. *anglica* , only found in England.
175. SPECIES: Add juniper *Juniperus communis*, small colony remains on the Downs
176. SPECIES: Add pennyroyal *Mentha pulegium*, on the edge of ponds.
177. SPECIES: Add fly orchid *Ophrys insectifera*
178. SPECIES: Add early spider orchid *Ophrys sphegodes*
179. SPECIES: Add burnt orchid *Orchis ustulata*
180. SPECIES: Add corn buttercup *Ranunculus arvensis*
181. SPECIES: Add field fleawort *Tephrosia integrifolia*
182. SPECIES: Add round-headed rampion *Phyteuma orbiculare*, also called '*Pride of Sussex*'

I trust these comments are useful and look forward to constructive discussions on how the council proposes to lead in engaging sectors across the city in progressing a shared Local Biodiversity Action Plan.

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