

Wildlife Improvement Policy – StreetScene-managed land. East Devon District Council.

1. Why has the Council introduced this policy?

1.1 Introduction

1.1.1 StreetScene is the service arm of East Devon District Council ('the Council'), which has responsibility for the maintenance of most of the Council's urban parks, gardens, open spaces, sports pitches, commons, and cemeteries. Green spaces that are not covered by this policy are those under the remit of the Council's Countryside department; those owned by Devon County Council, which includes highways and grass verges, which are often mistaken for Council land by residents; those owned by Town/Parish Councils; those owned by the Council and managed by StreetScene but are regularly maintained amenity areas; and sports areas.

1.2 The Global Nature Emergency

1.2.1 Intensive management of green spaces has contributed to the global nature emergency, which has led to the recognition that the Council's public green spaces are as much for the benefit of our endangered wildlife communities as they are for our communities of residents; with mutual benefit being gained from coexistence. It is therefore important to sensitively manage green spaces to balance amenity access/use with developing habitats for wildlife.

1.3 The Impact of Traditional Grounds Maintenance

1.3.1 The maintenance of amenity green spaces causes greenhouse gas emissions from hand-held, pedestrian-controlled, and ride-on equipment, which contributes to climate change. As an example, a typical diesel-powered ride-on mower releases more than 2.5kg of carbon for every litre of fuel burnt to maintain green spaces. Reducing regular mowing and strimming by creating Wildlife Improvement areas therefore results in fewer climate-changing emissions released. Most green spaces, however, must be maintained regularly for community access, use, enjoyment, well-being and health. StreetScene's grounds teams do not collect arisings from these regularly maintained amenity green spaces across the district whilst mowing due to the vast volumes of green waste/arisings – weighing an estimated 200,000kg per month – making collection unrealistic.

1.3.2 The arisings deposited on grass swards across amenity green spaces reduces biodiversity levels because of the intolerable conditions created for flora underneath, and nutrient enrichment of the soil as the arisings decompose and feed the ground between each maintenance visit enables grass growth to outcompete almost all other plant growth, leaving only a few grass species tolerating the conditions and proliferating in green spaces that have been intensively managed for a long time. This is why grasses continue to dominate Wildlife Improvement areas for several years after being converted from traditional maintenance. Low biodiversity levels in new Wildlife Improvement areas takes time and effort to rectify, as soil nutrient levels are depleted by the new management regime to allow wildflowers the opportunity to develop. In the meantime, however, the transitioned green spaces that are dominated by grasses are contentious for many residents due to the contrast between how the green space once looked – which residents often refer to as 'tidy' – and how they look when they are transitioned, when 'untidy' grasses dominate.

1.4 The UK's Nature Emergency

1.4.1 Wildlife Improvement areas are very much required because the UK is one of the most nature-depleted countries on earth, with the highest biodiversity losses in Europe. Since the 1970s, over 40% of UK animal species have declined, and over 25% of all UK mammals face extinction. Biodiversity has been depleted by centuries of pollution, unsustainable farming, development, the use of pesticides, and intensive maintenance; all of which have led to substantial habitat losses.

1.5 Devon's Nature Emergency

1.5.1 Devon supports a wide range of species and habitats that are internationally important, and there are species of global significance, such as the dormouse and the greater horseshoe bat, but these are under threat due to climate change, invasive species, pollution, development, and a lack of protection. The Devon Local Nature Partnership states: *'We have seen huge losses of wildlife across Devon. Our remaining habitats are largely disconnected from each other and are small and often in poor condition. We all need to take urgent action to create, enhance, expand, and connect wildlife habitats across the county.'* These stark facts are contrary to the feelings of many of the district's residents, which is helped by there being a lot of wild landscapes, countryside, and Areas of Outstanding Natural Beauty across the district, which seemingly support extensive biodiversity. Unfortunately, this is not the case, and this misconception supports residents and some Councillors to reason against traditionally maintained green spaces, or sections therein, being designated as Wildlife Improvement areas in urban and suburban areas across the district.

1.6 StreetScene's Environmental Responsibilities

1.6.1 To combat this ever-escalating situation, the UK government published its 25-year **Environment Plan** in 2018, with subsequent revisions due every 5 years of the Plan's life to keep up to date with changes. A recent revision, titled **The Environmental Improvement Plan** (2023) has the *'...long-term protection and favourable management needed for biodiversity to thrive'* as its principal priority – rising from the third priority in 2018. The government committed to protect 30% of England's land and sea by 2030 – but with 5 years remaining (to date), there is still less than 3% protected. Urgent action is needed to prevent a biodiversity collapse. The Council adopted a **Nature Recovery Declaration** in September 2023, signalling its intention to embed Nature Recovery/Wildlife Improvement in all its strategic Council plans and policy areas.

1.7 StreetScene's Targets

1.7.1 StreetScene is targeted with helping to reverse these life-threatening statistics by improving biodiversity and mitigating climate change through the transition of suitable amenity green spaces, or sections therein, to Wildlife Improvement. The target focuses on complying with nature recovery legislation by creating space for nature, reducing emissions, and taking action to reverse species decline, such as by developing Wildlife Improvement areas and monitoring biodiversity levels. This work fits in with the broader objectives and wider scope of the **Nature Recovery Declaration** and the enhanced Section 40 of the **Natural Environment and Rural Communities Act** (NERC), which places duties on local authorities to conserve and enhance biodiversity. It also feeds into the Council's Supporting Authority duties in the **Local Nature Recovery Strategy** (LNRS) work, led by the Council's Countryside department. The 'urban fabric' of which these policy areas will enhance form part of the Council's Local Habitats Map and Local Nature Recovery Plan for East Devon. StreetScene is targeted to assist Countryside's legislated duties by conducting a range of Wildlife Improvement activities on StreetScene-managed land to increase biodiversity and pass on

monitoring evidence. The success of this Wildlife Improvement policy will be based, in part, by these collaborations to help Countryside to quantify and map habitats on StreetScene-managed land to develop a Local Nature Recovery Plan for East Devon.

1.8 The Introduction of Wildlife Improvement Areas

1.8.1 StreetScene first transitioned several amenity green spaces away from intensive grounds maintenance in 2010 to reduce carbon emissions from maintenance equipment and to improve biodiversity. The number of these green spaces increased after the Council declared a Climate Emergency in 2019, followed shortly after by a Nature Emergency, which targeted green spaces to improve wildlife, whilst balancing amenity uses.

1.9 Enhanced Duties on Local Authorities

1.9.1 **The Environment Act** (2021) places an important duty on local authorities to ‘...*conserve and enhance biodiversity, and report on their actions*’, through modification of Section 40 of the **Natural Environment and Rural Communities Act** (NERC, 2006), which fits in with StreetScene’s history of developing Wildlife Improvement areas. Under The Environment Act (2021). Devon County Council (DCC) is a Responsible Authority (RA) to develop the county’s legislated **Local Nature Recovery Strategy** (LNRS), and EDDC is a Supporting Authority (SA) in the process and must have regard for the LNRS, once formally adopted. The Council’s Countryside department supports DCC in the development of a LNRS, and StreetScene is targeted to support Countryside by developing Wildlife Improvement areas and surveying biodiversity increases, to quantify habitats, which helps to meet EDDCs enhanced biodiversity and SA duties imposed by the Act.

1.9.2 StreetScene is compelled to develop and manage Wildlife Improvement areas by the following:

1.9.3 The Environment Act (2021) ‘*Through the Act, we will restore natural habitats, increase biodiversity and halt the decline in species by 2030. It is imperative that we step up action to boost nature recovery if we are to tackle the twin challenges of biodiversity loss and climate change.*’

1.9.4 Natural Environment and Rural Communities Act (2006) Section 40 ‘*Places a duty on all public authorities...to have regard, in the exercise of their functions, for the purpose of conserving biodiversity... for the conservation and enhancement of biodiversity.*’

1.9.5 EDDC’s Council Plan 2024-2028, Priority Two: A sustainable environment that is moving towards carbon neutrality and which promotes ecological recovery. ‘*Our wide-ranging approach focuses on climate action... sustainable development and habitat preservation.*’

1.9.6 StreetScene Service Plan 2024/25 ‘*Improve our sustainable management of green spaces*’ to ‘*help protect the environment, improve biodiversity, linked nature recovery areas, and meet Climate Change Action Plan aims.*’

1.9.7 Nature Recovery Declaration for East Devon ‘*We have both Climate and Biodiversity crises, and currently the United Kingdom is within the bottom 10% of countries globally and also the worst G7 nation for biodiversity loss.*’

1.9.8 Biodiversity Net Gain (2024) *'It is a way of creating and improving natural habitats. Created and enhanced habitats will be secured for a minimum of 30 years.'*

1.9.9 East Devon District Council Climate Change Strategy 2020 – 2025 *'Improve the quality and connectivity of natural habitats, promote nature recovery corridors and use green spaces for carbon offsetting.'*

1.9.10 East Devon District Council Climate Change Action Plan 2020 – 2040 *'Ensure that we address biodiversity and environmental issues as part of our climate change response.'*

2. What is the Council's policy?

2.1 Definition of a Wildlife Improvement Area

2.1.1 Wildlife Improvement areas are defined as StreetScene-managed amenity green spaces where maintenance regimes are minimised throughout the growing season to help nature and wildlife to recover.

2.2 Assessing and Establishing New Wildlife Improvement Areas

2.2.1 StreetScene-managed amenity green spaces will be assessed for potential transitions to Wildlife Improvement areas. This will be based on latest Census data to fully consider residents' protected characteristics and how these relate to green spaces' access and use. Other data will include online imaging, observations of community/visitor use and, when appropriate, questionnaires. These assessments will increase awareness of how/why communities use these green spaces. Potential Wildlife Improvement areas will then be selected for public consultations to gain wider perspectives. This will facilitate inclusive assessments to prevent negatively impacting upon residents' characteristics, such as those who potentially have a greater reliance on traditionally managed green spaces.

2.2.2 Green space assessments will consider the following:

- carrying out/recording Equality Impact Assessments and risk assessments.
- residents' access and the potential impacts on residents with limited mobility.
- the distance away from roads, verges, and pavements to keep these areas clear for access and visibility, such as sight lines.
- street furniture adjacent to the area.
- location of underground services.
- local biodiversity levels; designations/byelaws.
- the suitability of a green space for ongoing regular maintenance, e.g., steep banks/under trees, where maintenance can be difficult, hazardous, and damaging.
- the proximity of/to other amenity green spaces for community enjoyment.
- how much of a green space to transition without impacting community use.
- the impact on adjoining areas that are not traditionally maintained.
- factors affecting seasonal management, such as access, gradient, environmental considerations, financial implications, and the logistics of waste disposal.
- potential connectivity between green spaces.
- the potential of anti-social behaviour on a transition.

2.3 Balancing Community Access and Use with Space for Nature

2.3.1 In all scenarios, StreetScene is seeking to balance different uses of its green spaces whilst maintaining space for communities alongside areas set aside for nature. We are not, for example, suggesting that an important amenity or recreation green space is lost to Wildlife Improvement; rather that boundaries or margins can be enhanced through the creation of these areas.

2.3.2 The health and safety of residents, along with the community's needs, will take priority when assessing green spaces for transition potential. A minimum of a 1.5m strip of amenity grass will be maintained between Wildlife Improvement areas and pavements/roads that are managed by DCC Highways department. Mown boundary areas add to the appearance of an area, provide cues to intentions and care, and prevent the improbable event of a fire extending beyond a Wildlife Improvement area.

2.4 No-Mow Zones Under Tree Canopies

2.4.1 Grass/wildflowers will be allowed to grow under the canopies of mature trees. This reduced mowing—helps protect tree roots from compaction, limits disturbance to wildlife and avoids damage from equipment, such as to low-hanging branches. Canopy damage and root compaction can affect trees' health and security. This practice will also be carried out in many regularly maintained green spaces.

2.5 Communications and Signage

2.5.1 Wildlife Improvement communications and signage will be designed and used in collaboration with the Council's Communications team. Signage will be designed to inform, engage, and educate residents and visitors as to areas' importance, whilst raising awareness of issues, such as the impacts of trampling/dog fouling. Communications will be as inclusive as possible and consider the Equality Impact Assessment created for this work. Communications will include social media posts, residents' updates, articles in local newspapers, Councillors' updates, circulars, tenants' magazines, interpretation boards, the Council's website and apps, Town/Parish Council communications, and press releases. Signage will be installed in Wildlife Improvement areas' and will be monitored and replaced/kept up to date through the season, and retrieved before sites are cut and collected each Autumn.

2.6 Protecting Wildlife Improvement Areas

2.6.1 The Council's Environmental Health department will be consulted with, when appropriate, to propose public consultations in specific Wildlife Improvement areas as Byelaw-enforced zones for dogs to be kept on leads, when dog fouling away from accessible pathways through Wildlife Improvement areas impacts upon habitats and public health. Dog owners often have difficulty finding fouling when they are some distance away during fouling, such as when dogs are allowed to run free in these important habitat areas. Dog owners' attempts to then find foulings can cause further damage to these habitats due to the sensitivity of a lot of flora and fauna to disturbance. For example, the critically endangered ground-nesting curlews that are being encouraged by sensitive green space management will not return to their nests when disturbed by dogs and/or people. To highlight just this one issue, Devon has tragically lost 85% of its curlews since 1985. Although the vast majority of residents/dog owners are responsible, minimising damage to Wildlife Improvement areas by trampling and fouling is crucial for the protection of nature in our Wildlife Improvement areas, which will take the forms of signage; public communications to inform, engage, and educate residents; and enforcement on the ground to challenge and redress irresponsible behaviour,

which predominantly occurs as a result of an unawareness of the relationship between behaviour and damage.

2.7 Management and Maintenance of Wildlife Improvement areas

2.7.1 Wildlife Improvement areas will not be mown throughout the growing season to prevent damage to wildlife habitats, other than pathways through areas to maintain access, but this will be determined on case-by-case basis. The sites will be cut and collected in Autumn (ideally September to October as timings are dependent on weather, ground conditions and extent of flowering). There may be a 2-week gap between cutting and then collection to allow seeds to drop and for insects to migrate from the collection areas. Arisings will be collected and removed to prevent their decomposition. Some sites may not receive an annual cut for practical reasons, i.e., access issues or staggered cutting and collection to allow some sections to be left uncut each year to leave alternating areas for nature. Other sites will not cut at all, and left to grow and establish into wildlife havens, such as in inaccessible areas. These are the exception but need to be noted within this policy.

2.7.2 StreetScene is targeted to challenge and mitigate climate change and biodiversity losses by a wide range of legislations, policies, plans, and strategies. Seasonal maintenance – the cutting, collecting, and removing of green waste from a site – of Wildlife Improvement areas is necessary to prevent the breakdown of organic matter nutrifying soils. Soil nutrification in this way is of benefit to grasses, but at the detriment of wildflowers. Grasses that can access soil nutrients from decomposing organic matter that has not been removed from a site are able to outcompete and smother wildflowers. The removal of arisings from accessible Wildlife Improvement areas each autumn across the district since 2019 has resulted in grasses becoming less dominant, which has created space for wildflowers for grow – attracting a range of insect pollinators and wildlife up the food chain.

2.8 Seasonal Maintenance of Wildlife Improvement Areas

The following seasonal maintenance criteria must be followed to ensure Wildlife Improvement areas maintain biodiversity levels to encourage wildlife, reverse biodiversity losses and mitigate climate change:

- timing of cutting and collection to be later than when wildflowers set seed, but earlier than when the ground conditions become too wet for equipment to access.
- when prolonged rains from early in Autumn prevents sites from being cut and collected, they will be cut and collected between Autumn and early the following Spring to enable good propagation of wildflower seed, to reduce nutrients, and to suppress grass growth/improve wildflowers.
- smaller/less accessible areas will be cut and collected by grounds teams in Autumn.
- for the few sites that cannot be accessed by grounds teams with large equipment, their Autumn work on those sites will require strimming and raking the arisings, with help from other grounds teams and/or volunteers, when necessary.
- wildlife Improvement areas cannot be left without a seasonal clearance and collection or arisings due to how crucial it is to break nutrient cycling habitat value.
- some sections within Wildlife Improvement areas will not be cut and collected each year due to specific characteristics that pose hazards to grounds teams.

2.9 Policy Implementation

2.9.1 Underpinning and ongoing programmes of work will be developed for wildlife improvement areas to implement this policy, and to review, update and improve practices. To do so, Wildlife Improvement areas will be visited during the year to assess how well maintenance activities are conducted by grounds teams, such as how well and how often boundary and through-paths are mown, and how appropriate this is for residents' access and use of the green space. Management and maintenance plans will be revised with the characteristics/number of Wildlife Improvement areas, to conform with StreetScene's biodiversity and climate change targets. In addition, new and innovative management methods/equipment will be reviewed with the aim of applying them to the future management and maintenance of Wildlife Improvement areas.

2.10 Policy Evaluation

2.10.1 On a smaller scale, the successes of this policy will be based on the results from surveying and monitoring flora and fauna in Wildlife Improvement areas, and comparing biodiversity levels with those that exist in adjacent, regularly mown areas, which will evidence biodiversity changes as a direct result of Wildlife Improvement strategies and practices.

2.10.2 On a wider scale, with biodiversity evidence presented to Countryside for specific areas, successes will be based on Countryside's habitat mapping of StreetScene-managed land and a future (to date) Local Nature Recovery Plan for East Devon. At a local level, successes will be determined by Wildlife Improvement areas that:

- are less dominated by grasses.
- are more colourful and biodiverse.
- are more engaging, informative, and educational.
- are managed and maintained in the proposed ways.
- aid duties to a level that befits StreetScene's responsibilities.

3. Policy Administration

3.1 Links Related to Policies, Strategies, Plans and Legislations

3.1.1 [Environment Act 2021 \(legislation.gov.uk\)](https://legislation.gov.uk)

3.1.2 [Council Strategy - East Devon](#)

3.1.3 [Action Plan - East Devon](#)

3.1.4 [Service Plan objectives for 2021-22 v2 003 JA.pdf \(eastdevon.gov.uk\)](#)

3.1.5 [120122 Streetscene key service objectives for 2022-23.pdf \(eastdevon.gov.uk\)](#)

3.1.6 [Streetscene-service-plan-2024-2025-final.pdf \(eastdevon.gov.uk\)](#)

3.1.7 [Nature Recovery Declaration for East Devon.pdf](#)

3.1.8 [Agenda for Scrutiny Committee on Thursday, 5th October, 2023, 6.00 pm - East Devon](#)

3.1.9 [Devon Nature Recovery Network - Devon Local Nature Partnership \(devonlnp.org.uk\)](https://devonlnp.org.uk)

3.1.10 [Biodiversity net gain - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

3.1.11 [Council Plan](#)

3.1.12 [UN Convention on Biological Diversity](#)

3.1.13 [United Nations Environment Programme](#)

3.1.14 [Natural Environment and Rural Communities Act 2006 \(legislation.gov.uk\)](https://legislation.gov.uk)

3.1.15 [Environmental Improvement Plan \(publishing.service.gov.uk\)](https://publishing.service.gov.uk).

3.1.16 [Agenda for Scrutiny Committee on Thursday, 13th June, 2024, 6.00 pm - East Devon](#)

3.1.17 [Link 30x30 Progress Report 2024.pdf \(wcl.org.uk\)](#)

3.1.18 [State of Nature 2023 - report on the UK's current biodiversity](#)

3.1.19 [Discrimination: your rights: Types of discrimination \('protected characteristics'\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/discrimination-your-rights-types-of-discrimination-protected-characteristics).

3.2 Data Protection

3.2.1 All personal data is kept in accordance with legislation and Council policy. [Data Protection Policy - East Devon](#).

3.3 Policy Consultation

3.3.1 The proposed policy relates to several Scrutiny Committee recommendations to Cabinet on 13.06.2024.

3.3.2 ELT will review the proposed Wildlife Improvement policy. Date of approval: TBC (to be updated post-review).

3.4 Policy Review

3.4.1 StreetScene's Operations Manager is responsible for control of this policy and for initiating any briefings or training following subsequent revisions.

3.4.2 This policy will be regularly reviewed to incorporate changes to the management and maintenance of Wildlife Improvement areas based on the implementation of improvements supported by responses via consultations with grounds teams, residents, town/parish councils and councillors. Reviews will also discourage negatively impacting East Devon's residents, as communities transform, to evaluate and integrate residents' characteristics, as part of a re-evaluated Equality Impact Assessment. This will foster good community relations and comply with the Public Sector Equality Duty.

3.4.3 The first policy review date is scheduled for 02/2027.