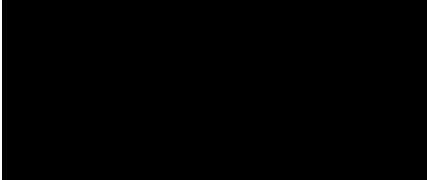





Comment

Consultee	Mrs Louise Cole (1264281)
Email Address	
Address	
Event Name	Wandsworth Local Plan - Regulation 19 Consultation
Comment by	Mrs Louise Cole (1264281)
Comment ID	21
Response Date	10/02/22 16:47
Consultation Point	21 Green and Blue Infrastructure and the Natural Environment (View)
Status	Submitted
Submission Type	Web
Version	0.1

Do you consider the Local Plan is legally compliant? Yes

Do you consider the Local Plan is sound? No

If you have entered 'No' to the above, please answer the below. Otherwise, please go to the next question. Do you think the Local Plan is unsound because it is not: (Please tick all that apply)

Consistent with national policy

Do you consider the Local Plan complies with the duty to co-operate? Yes

Please give details of why you think the Local Plan is not legally compliant and/or is unsound and/or fails to comply with the duty to co-operate.

If you wish to provide comments in support of the legal compliance and/or soundness of the Local Plan, or its compliance with the duty to co-operate, please use this box to set out your comments.

Please note your response should provide succinctly all the information, evidence and supporting information necessary to support / justify the response. After this stage, further submission will only be at the request of the Inspector, based on the matters and issues they identify for examination.

The Local Plan is not sound because it is not consistent with national or London policy, in particular:the London Plan (2021) Policy G6 Biodiversity and Access to Nature (item B(4), page 325), which calls for: "*artificial nest sites that are of particular relevance and benefit in an urban context*";

. https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

NPPG (Natural Environment 2019) Paragraph 023 highlights the value of swift bricks to wildlife:

"*Relatively small features can often achieve important benefits for wildlife, such as incorporating 'swift bricks'*"

. <https://www.gov.uk/guidance/natural-environment>

These policies are to provide nesting places for red-listed endangered buildings-based species such as swifts, house sparrows, and starlings, that occur in Wandsworth but in rapidly declining numbers.

These built habitats are excluded by the biodiversity net gain calculation and these species cannot use for nesting the other features mentioned in 21.31: green roofs and trees.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, when considering any legal compliance or soundness matter you have identified in the question above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination.

You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please note your response should provide succinctly all the information, evidence and supporting information necessary to support / justify the suggested change. After this stage, further submission will only be at the request of the Inspector, based on the matters and issues they identify for examination.

Please add to the end of the third paragraph of 21.31: , *and artificial nest sites that are of particular relevance and benefit in an urban context such as swift bricks.*

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

If you are seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? (Please tick box as appropriate)

No, I do not wish to participate in hearing session(s)

From: louise Cole [REDACTED]
Sent: 27 January 2022 15:23
To: PlanningPolicy Wandsworth
Cc: Michael Priaulx; Belton, Tony (Cllr); Govindia, Ravi (Cllr); Field, Richard (Cllr); Hogg, Simon (Cllr); Humphries, Guy (Cllr); McDermott, Sarah (Cllr)
Subject: Wandsworth Local Plan, Publication edition
Attachments: AfS leaflet 2021.pdf; AfS three swift bricks.jpg

To whom it may concern:

Re: Wandsworth Local Plan

LP55 Biodiversity

A. The Council will protect and, where appropriate, secure the enhancement of the borough's priority species, priority habitats and protected sites as well as the connectivity between such sites. This includes but is not limited to Special Areas of Conservation, Sites of Special Scientific Interest, Local Nature Reserves, Local Wildlife Sites and Sites of Importance to Nature Conservation.

B. Development proposals will be required to protect and enhance biodiversity, through:

1. ensuring that it would not have an adverse effect on the borough's designated sites of habitat and species of importance (including buffer zones), as well as other existing species, wildlife, habitats and features of biodiversity value;

2. The incorporation and creation of new habitats or biodiversity features on development sites including through the design of buildings and use of Sustainable Drainage Systems where appropriate. Developments will be required to deliver a net gain in biodiversity, through the incorporation of ecological enhancements;

3. ensuring that new biodiversity features or habitats connect to the existing ecological and green and blue infrastructure networks and complement surrounding habitats;

4. enhancing wildlife corridors for the movement of species, including river, road and rail corridors, where opportunities arise; and

5. maximising the provision of ecologically functional habitats within soft landscaping.

C. Development which would have an impact on priority species or priority habitat(s) will only be permitted in exceptional circumstances where:

- 1. it has been demonstrated that there is no alternative site layout or site that would have a less harmful impacts; and*
- 2. the impact has been adequately mitigated either through on or off-site measures*

I am contacting Wandsworth Council on behalf of Wimbledon Swifts, an informal local group with a special interest in promoting conservation for swifts in the Wimbledon and surrounding areas. The group belongs to a network of others across the UK who are working to publicise information on swift conservation. I have contributed to a number of Local Plan consultations, including Wandsworth's, to raise awareness of the potential during redevelopment for supporting the UK's fast dwindling, and officially endangered, swift population. At least one other London-based swift conservation advocate has also submitted comments on the proposed Wandsworth Local Plan.

Swifts are exciting migrant birds who come here in the summer months from Africa in order to breed. They are faithful to their established nest sites, ie, cavities in our older buildings, but their traditional nesting habitat has been rapidly disappearing as a result of building demolition and renovation. Nest site losses are not currently compensated for in modern building work, fuelling the rapid decline of swift numbers. Please see the attached leaflet for information.

The Wandsworth Local Plan (publication stage) is hugely disappointing and unsatisfactory as no reference has been made to the potential for constructive measures to support swifts as part of local redevelopment. The section of the plan relating to biodiversity, LP55, is very vague as regards the borough's objectives and ambitions for biodiversity net-gain, and there are no practical proposals through which to achieve 'biodiversity net-gain'. LP55 fails to highlight the potential of the built environment to provide new habitats, through features such as integrated universal swift bricks. These artificial nests are used by a range of garden bird species, eg the red-listed house sparrow, in addition to swifts. An image has been attached to show swift bricks, courtesy of Action for Swifts, (<https://actionforswifts.blogspot.com>)

The NPPF highlights the significance of small features in achieving biodiversity net-gain:

National Planning Policy Guidance:

<https://www.gov.uk/guidance/natural-environment>

Paragraph: 023 Reference ID: 8-023-20190721:

'Planning conditions or obligations can be used..... to achieve **biodiversity net gain**..... The work involved may.....involve creating new habitats, enhancing existing habitats,Relatively small features can often achieve important benefits for wildlife, such as incorporating '**swift bricks**' and bat boxes in developments.....'

LP55 contrasts with the robust and proactive approach seen in some other London local plans towards 'net-gain' in biodiversity. Merton, Richmond and Islington Local Plans all contain the following paragraph:

'Development.....should utilise opportunities to attract new species to a site. This can include the incorporation of artificial nest boxes and bricks in buildings to provide nesting and roosting opportunities for birds, including species under threat such as swifts, house martins, swallows and house sparrows, and where appropriate, bats. Swift bricks integrated into new buildings are preferred, as these are suitable for multiple bird species. As outlined in the NPPG 2019 (para 023) these relatively small features can achieve important benefits for wildlife. Applicants will be expected to provide details of such features as part of planning applications.'

Due to the dearth of specific requirements and proposals in LP55, the issue of biodiversity enhancement and habitat creation will be left to the inclination, or disinclination, of developers. The lack of objectives and obligations are likely to result in absent or minimal biodiversity enhancement and habitat creation features. This is a missed opportunity to improve the outlook for our precious swifts and does nothing to help them avoid eventual extinction in the UK.

Justification for comments:

Swifts were classified as **Red-listed**' in the BTO's *Birds of Conservation Concern* 2021 report, signifying their **endangered** status and a need for **urgent conservation action**. Swifts are classified as **Endangered** in the current International Union for Conservation of Nature **Red List**, meaning they are at risk of extinction in the UK.

The Environment Agency's State of the Urban Environment report (23/07/21) confirms the loss of species which are '**urban specialists**', eg **swifts**:

'.....Some species are considered 'urban specialists'. For example, swifts, which nest in cavities in the roofs of older buildings.Urban specialist birds have declined in abundance in the UK since 1994..... ..Factors contributing to some of these species' declines include building, demolition, renovation and roof repair.'

<https://www.gov.uk/government/publications/state-of-the-environment/the-state-of-the-environment-the-urban-environment>

The Chartered Institute of Ecology and Environmental Management Journal, Issue 104, June 2019:

<https://cieem.net/resource/the-swift-a-bird-you-need-to-help/>

26/07/21: 'Swift Bricks: The 'Universal' Nest Brick – by Dick Newell':
<https://cieem.net/swift-bricks-the-universal-nest-brick-by-dick-newell/>

https://swift-conservation.org/universal_swift_nest_brick02.pdf

The Government's Building Better Building Beautiful Commission report 'Living With Beauty'

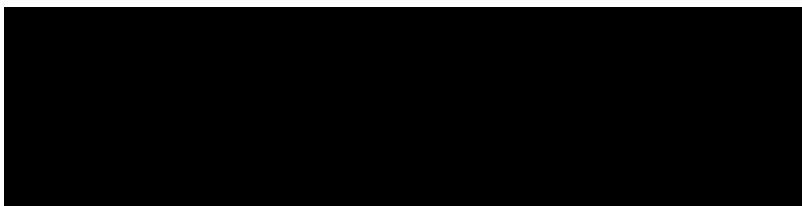
(30/01/20, Policy Proposition 33, page 110)

Recommends: '**Bricks for bees and birds in new build homes'**'.

<https://www.gov.uk/government/publications/living-with-beauty-report-of-the-building-better-building-beautiful-commission>

For further information, please visit the official swift conservation website,
<https://swift-conservation.org/>

From







Swifts Need Help!

**Action for Swifts
Swift Conservation
Swifts Local Network**

Swifts are remarkable birds

They spend almost their whole lives in the air
They eat, drink, sleep and mate on the wing
They come to Europe each summer
They return to Africa at the end of July
a round trip of 14,000 miles!



Similar birds

Unlike Swallows and Martins,
Swifts have dark underparts
and they never perch on wires
Swift nests are always out of sight



© Tom Lindroos



Swifts nest in old buildings

They are faithful to their nest sites
Old buildings are knocked down, repaired
or insulated. New buildings have no
nooks or crannies, so when Swifts arrive
back from Africa they find their nesting
places have gone:

© Ove Claesson

THEY ARE HOMELESS!



Swift migration

These tracks are from a
geolocator attached to a
Swift nesting in,
Cambridgeshire in 2011.

The Swift returned in 2012
safe and sound.

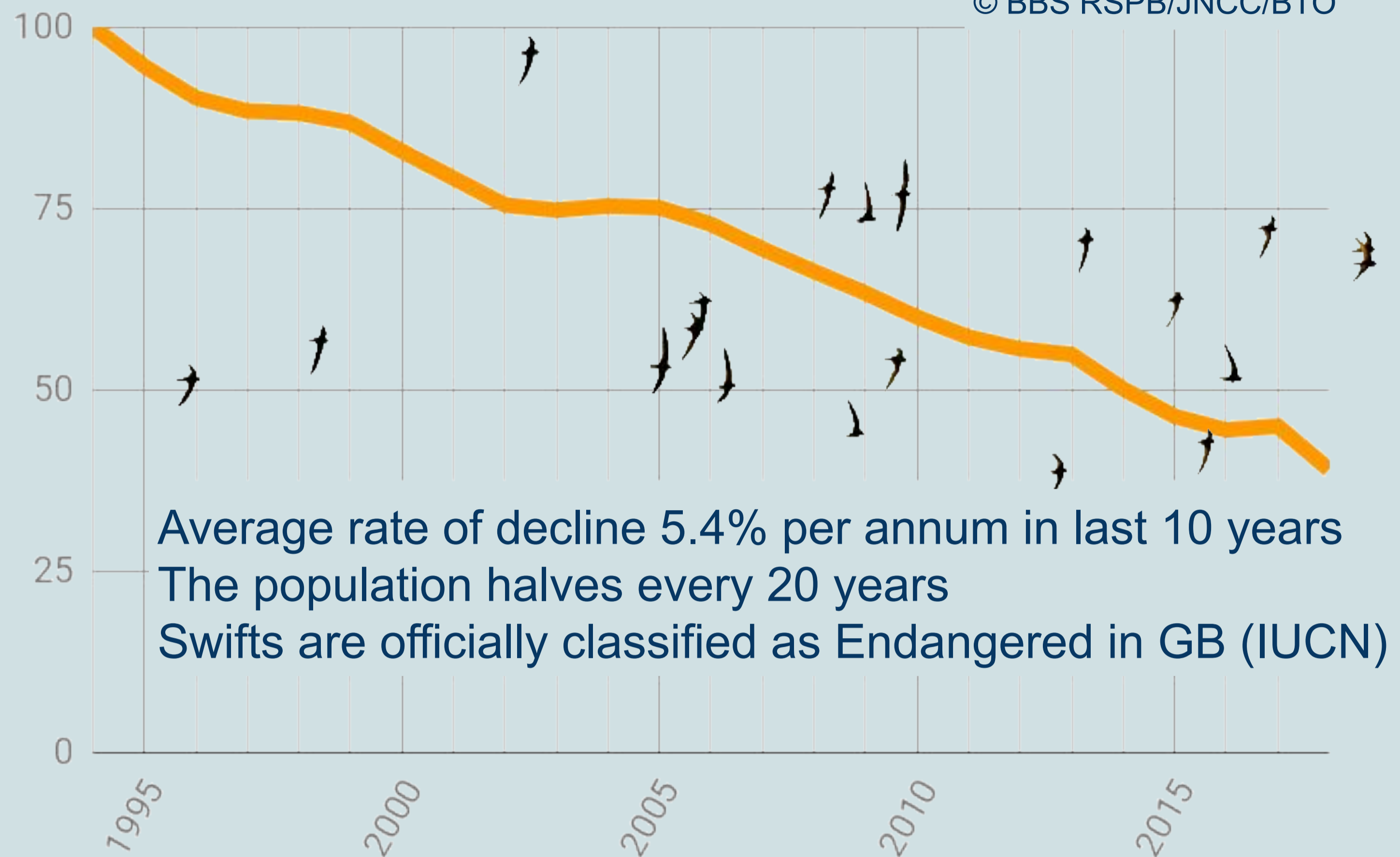




Swifts are in trouble

Swift Annual Index 1994 - 2018

© BBS RSPB/JNCC/BTO



WHAT CAN BE DONE?

Leave existing nest sites undisturbed

Put up nest boxes

At least 4 metres high, higher is better

Defended from sun and rain, with a clear flyway

Swift attraction calls increase your chances



SWIFT NEST BOXES IN CHURCH BELFRIES

Both of these churches in Suffolk and Cambs host substantial colonies



© Judith Wakelam



Model of typical belfry boxes



For guidelines see: actionforswifts.com/p/belfry.html



NEST BOXES FOR SWIFTS

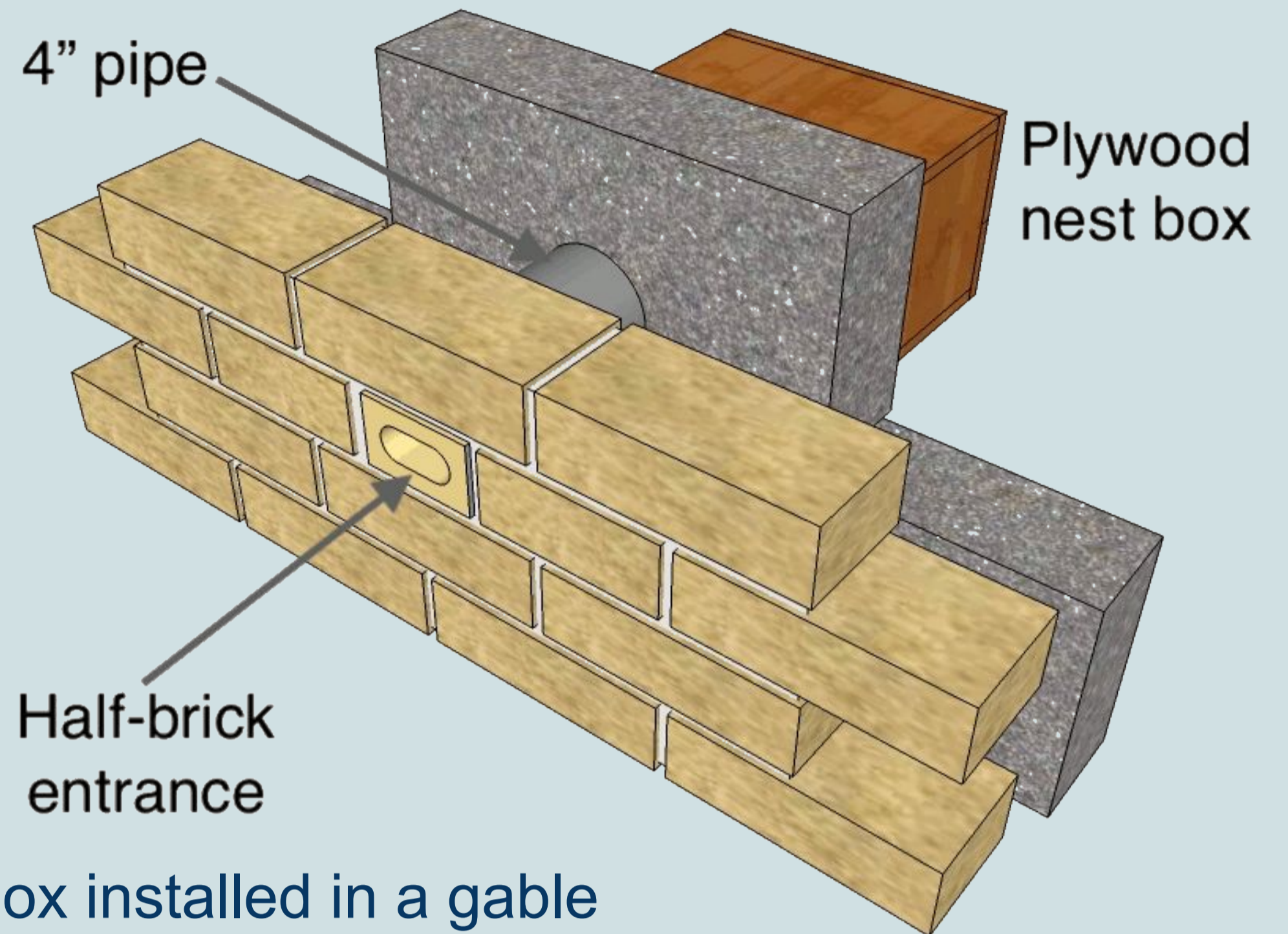


© Judith Wakelam

INTERNAL NEST BOXES: secure, thermally stable, easily installed in new build, and can be retrofitted

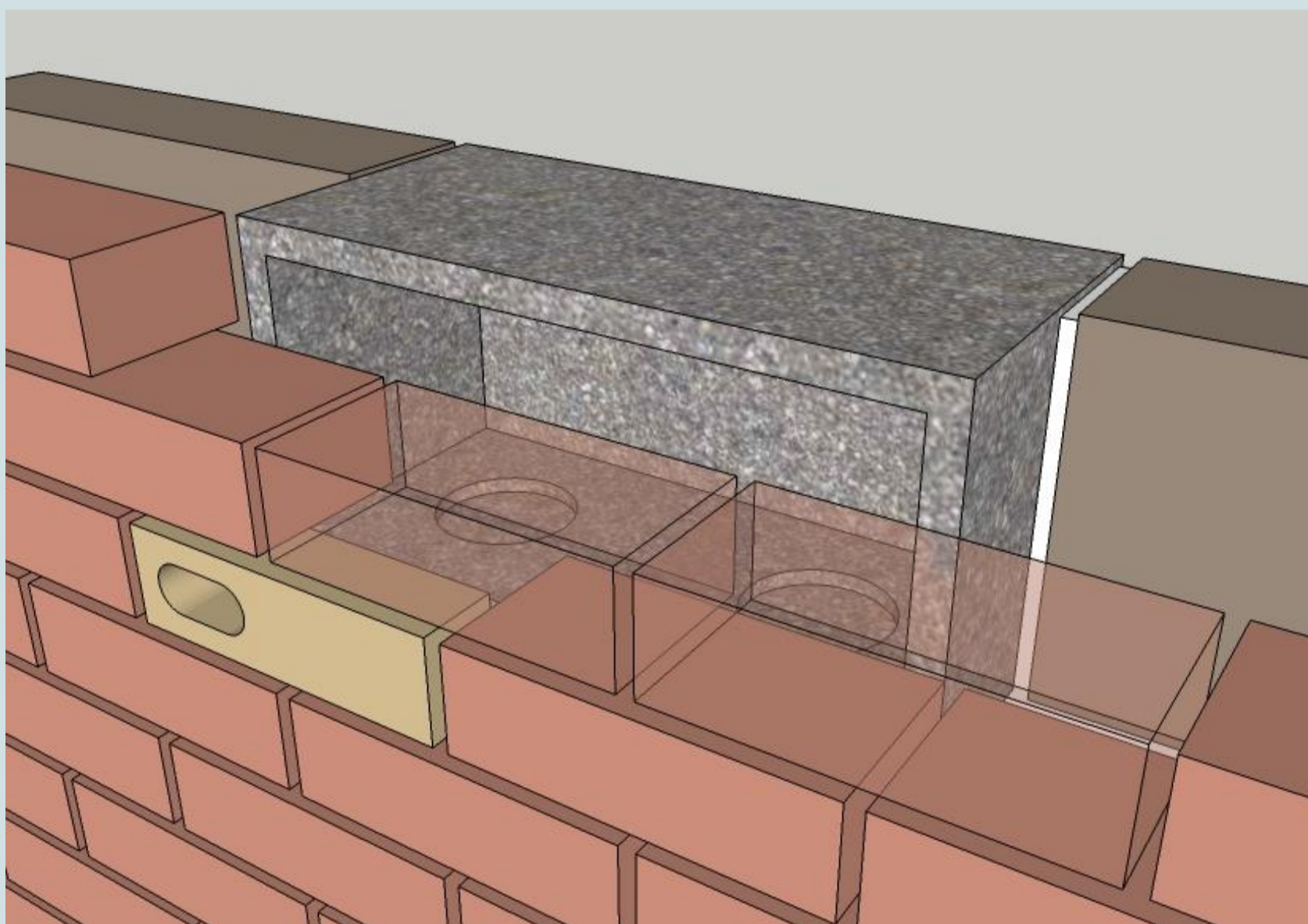


© Clive Cooper

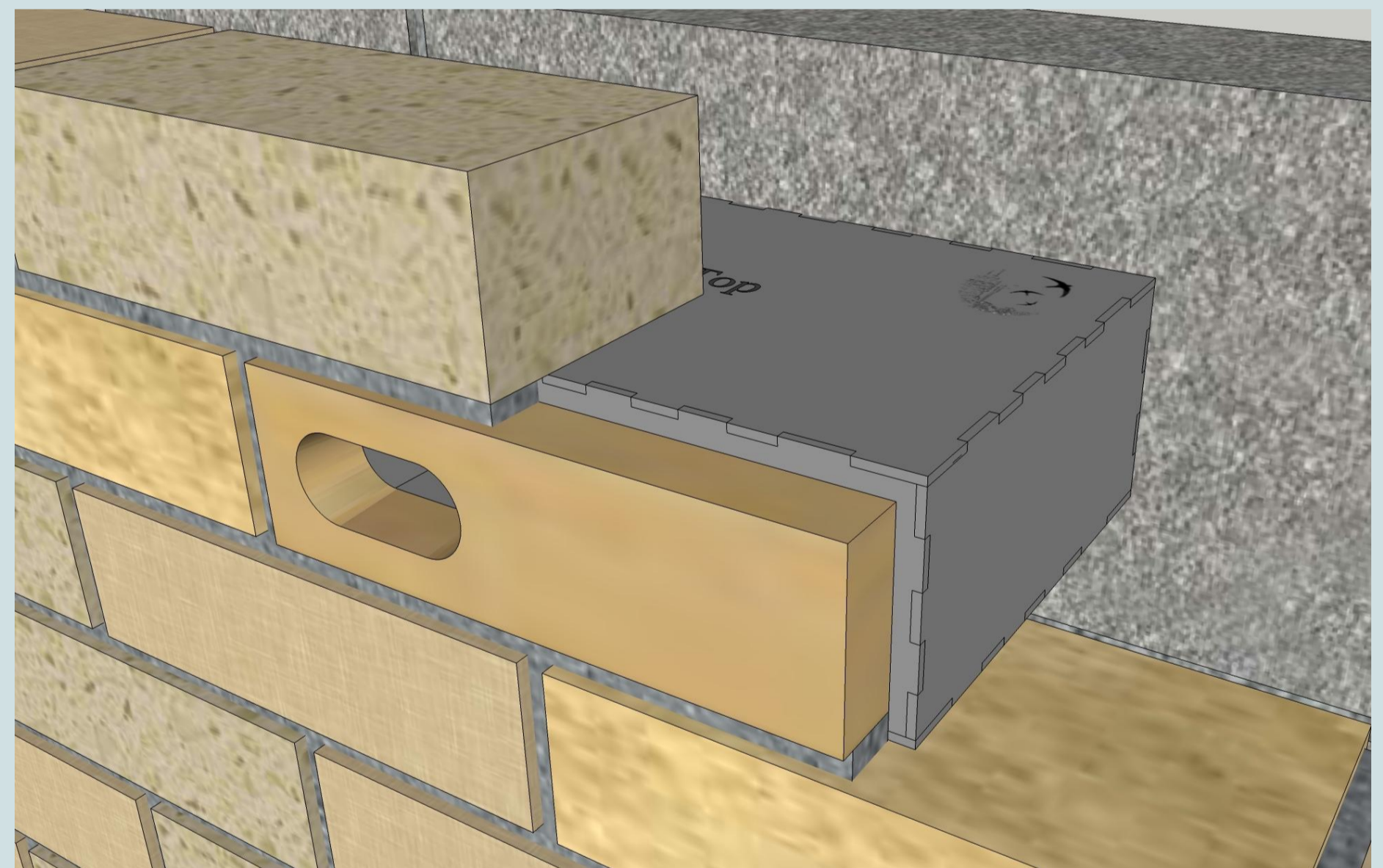


Cambridge System nest box installed in a gable

SWIFT BRICKS: available from a number of manufacturers. Easy in new build. See actionforswifts.com/p/swift-bricks.html



CJ Cambridge System



S Brick

EXTERNAL NEST BOXES: Many commercial products.

See: swift-conservation.org/Shopping!.htm For DIY designs: actionforswifts.com/p/diy.html



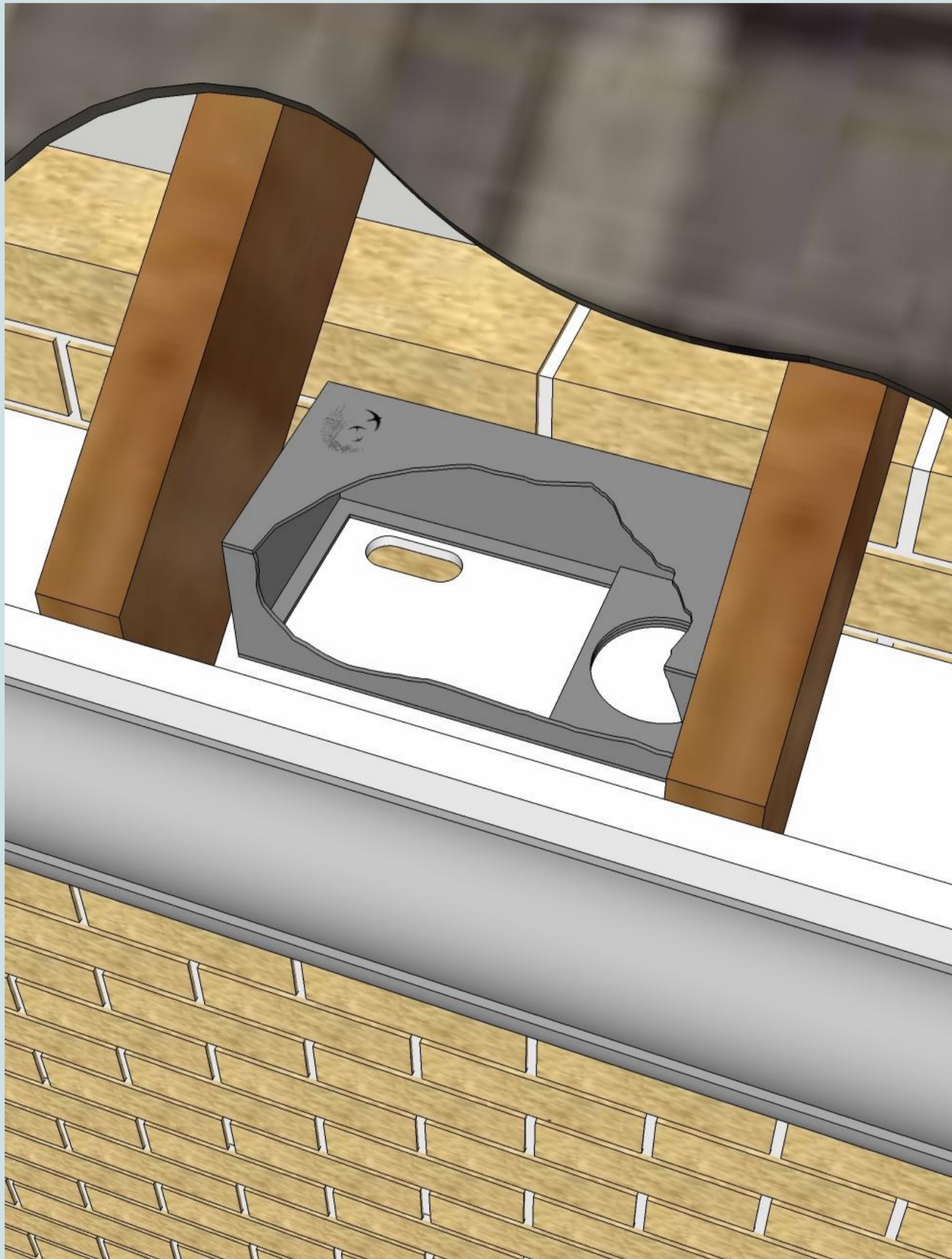
A simple DIY under eaves nest box



Model 30 - suitable for exposed positions



Nest box inside closed eaves



S Brick for eaves



Tailored triangle box with 9 chambers



If you find a grounded Swift

and it cannot fly, put it in a closed, ventilated box. Swifts are difficult to care for, so get in touch with a specialist in the field. For links to comprehensive advice:

actionforswifts.com/p/grounded-swift.html

Need More Help? Free advice is available from:
Action for Swifts

E-Mail: actionforswifts@gmail.com

Website: actionforswifts.com

Swift Conservation

E-Mail: mail@swift-conservation.org

Website: swift-conservation.org

Bristol Swifts

Website: bristolswifts.co.uk

RSPB

Website: RSPB.org.uk/helpswifts

Swifts Local Network (SLN)

Link: actionforswifts.com/p/sln.html



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