

Comment

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| Consultee | Mr Michael Priaulx (1256448) |
| Email Address | [REDACTED] |
| Company / Organisation | Swifts Local Network: Swifts & Planning Group |
| Address | [REDACTED] |
| Event Name | Wandsworth Local Plan - Regulation 19 Consultation |
| Comment by | Swifts Local Network: Swifts & Planning Group (Mr Michael Priaulx - 1256448) |
| Comment ID | 53 |
| Response Date | 28/02/22 10:35 |
| Consultation Point | 21.31 Paragraph (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) | <input type="checkbox"/> 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, and also inconsistent with the Wandsworth Biodiversity Strategy 2020 which states that policies for priority species will be included in the Local Plan, but the Local Plan does not do so (the Statement of Consultation for the pre-publication stage incorrectly states that this would be captured in the Biodiversity Strategy for Wandsworth, and so creates an unresolved loop between the Biodiversity Strategy and Local Plan). In more detail, the Wandsworth Biodiversity Strategy 2020 (chapter 10, page 9) states: "Priority species in Wandsworth are:... swift... priority species will be afforded protection from development through appropriate policies in the Wandsworth Local Plan" - however, the Local Plan does not do this and the Statement of Consultation Regulation 18 January 2020 for the pre-publication stage states (comment numbers 278, 239, 270 and 431): "swifts/ swift nesting boxes... Details about this would be captured in the Biodiversity Strategy for Wandsworth which has been adopted...", thereby creating an unresolved loop between Biodiversity Strategy and Local Plan. The supporting policies for the change are: London Plan (2021) Policy G6 Biodiversity and Access to Nature item B4 (page 325): "*Boroughs, in developing Development Plans, should: ... 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 states the value to wildlife of swift bricks specifically: "*Relatively small features can often achieve important benefits for wildlife, such as incorporating 'swift bricks'*"

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

Swift bricks are a universal nest brick so also provide for other Wandsworth priority species: house sparrow and starling. Note that the DEFRA net gain for biodiversity methodology doesn't give value to either existing populations of building-based birds, or the provision of artificial nest sites, so therefore a separate policy is required for protection of priority species such as swifts which use buildings to nest.

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 sentence 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) . Yes, I wish to participate in hearing session(s)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To provide further information, if required.