Wandsworth Biodiversity Supplementary Planning Document (SPD)

Consultation Report

December 2025

About the consultation:

The Biodiversity Supplementary Planning Document (SPD) sets out the Council's requirements and guidance to ensure biodiversity is considered and integrated when developments are designed. It supports the biodiversity policies set out in the Wandsworth Local Plan (July 2023), in particular Policy LP55.

The SPD provides additional advice to those seeking planning permission for a proposal, to explain what applicants need to do, what should be addressed, what documentation needs to be provided and when. It includes bespoke advice to help applicants tailor their proposals to ensure the most important species and habitats are protected and enhanced in the borough. The SPD delivers detailed information on different ways developments can ensure biodiversity is protected and thrives, through advice on targeted ecological enhancements which can support important species such as swifts and sparrows, stag beetles and badgers, and on how to incorporate new features such as ponds and green roofs.

The SPD has been developed in parallel with the emerging Wandsworth Biodiversity Action Plan and the GLA London Local Nature Recovery Strategy which will identify opportunities for implementing biodiversity priorities.

A four-week public consultation ran from Tuesday 2 September to Tuesday 30 September 2025.

Representations could be made by any persons:

- via the online consultation platform
- By email to planningpolicy@wandsworth.gov.uk
- By post to Spatial Planning & Design, Wandsworth Council, Wandsworth High Street, London, SW18 2PU

A response form was provided.

Who was consulted?

Letters and emails were sent to both statutory and non-statutory consultees on the Council's Local Plan database which consists of individuals and organisations who are

either prescribed bodies for the purpose of consultation or had requested to be notified of consultations on local development documents. These letters and emails gave notification of the consultation and the consultation period; how to access the document; how to make a representation; and contact details to find out further information.

Paper copies were made available, together with paper response forms, in the borough's main libraires (Balham, Battersea, Putney, Roehampton, Tooting and Wandsworth) and the Town Hall Reception. Information was given to library staff and the Town Hall Reception regarding the consultation and who to contact for further information.

Details of the consultation was posted on the Council's Planning Policy Consultation webpage and on the Council's Consultation Engagement Hub (Citizen Space).

Summary of Response to the consultation:

10 responses were received from 9 individuals/organisations, including no comment responses from National Highways and Natural England. Summaries of the responses, the Council's response and any amendments made to the final document are shown in the Appendix.

Overall:

- Whilst 9 consultees made specific comments, 2 responses came from the same organisation.
- 2 consultees, noted above, acknowledged the consultation and review of the SPD, but had no comments to make.

The key points raised were:

- Additional detailed text suggested by the Environment Agency to the sections primarily on aquatic and riverine environments.
- The relationship between biodiversity and heritage considerations, with minor amendment to text suggested by Historic England.
- Amendments suggested to text relating to recommended nesting accommodation for swifts and house sparrows.
- The importance of providing guidance for protecting and enhancing biodiversity where tall buildings are proposed.
- The importance of front and back gardens in enhancing biodiversity and whether existing construction practices impact on green spaces/ front gardens.
- How planning enforcement can ensure biodiversity objectives are met.

Biodiversity Supplementary Planning Document Consultation

Appendix 1: Schedule of Consultation responses, Council comments and changes made.

This document captures all responses received to the consultation (2 September to 30 September 2025) on the draft *Biodiversity Supplementary Planning Document*, the Council's response and any changes made to the final SPD as a result.

Note that comments / submissions from respondents are included in the table in the form in which they were written. They are not alphabetically ordered or in any other order of priority.

Consultee ID	Name / Organisation
E1	Battersea Society
E2	Environment Agency
E3	Historic England
E4	Louise Cole
E5	Mike Priaulx
E6	National Highways
E7	Natural England
E8	Mike Priaulx obo Swifts Local Network: Swifts & Planning Group
E9	Michael Priaulx obo Swifts Local Network: Swifts & Planning Group
E10	Vickesh Rahod obo DPDS Ltd

Consultee name	ID	Comments	Council Response	Notes/changes made to the final version of the SPD
Battersea Society	E1	**Biodiversity SPD** **Generally**: • We note that the SPD will need to dovetail with the Council's Biodiversity Action Plan, about which there is also a public consultation running; we are responding to that as well. • We understand that the SPD is principally aimed at consultants acting on behalf of developers, and would encourage the Council to identify and secure biodiversity and greening objectives at an early stage of any new scheme presented to it. Such objectives could be routinely interrogated at Design Review Panel perhaps, if they aren't already. Their achievement can then become integral to any new scheme from the outset, rather than being treated as a burdensome add-on likely to create extra costs and delays. • While this SPD contains a wealth of excellent material, it is at present both lengthy and complex to read. Could it prove beneficial to simplify it by placing some of its detail elsewhere, and making it available by links? We note that much of what it says is also relevant to householders, including some who might not currently be contemplating a planning application. If the valuable information contained here could be made more readily available, this could encourage them to retrofit some of the measures proposed or reverse previous alterations to their properties.	The SPD has been produced alongside the emerging Biodiversity Action Plan and Local Nature Recovery Strategy. Noted. The SPD is intended to assist all applicants submitting applications. The SPD sets out that the Council recommends applicants discuss their proposals at the pre-application stage. The SPD aims to provide advice for applicants but also considers how biodiversity can be enhanced in a wider sense. Users can navigate around the document using the internal links and there are numerous links to useful websites with additional information included.	None.

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		Private gardens. We are interested in what is said about private gardens, both front and rear. While the Borough has extensive areas of public open space, private gardens also potentially offer a vast capacity to improve its biodiversity. By preventing their further degradation, and encouraging their enhancement, the Council will also reduce pressure to rewild public parks, commons and other open spaces that have to fulfil multiple other functions including recreation and sport. **Front gardens**. Well maintained planted front gardens will add to the attractiveness of a street and help mitigate against air pollution. Whether maintained or not, any planted garden will also act as a corridor for pollinators and other species. However, many planted front gardens have already been lost within the Borough; if this trend is to be reversed, it will need encouragement beyond that provided by an SPD. Para 5.33 of the Biodiversity SPD does allude to the fact that planning permission needs to be sought for areas of 5sqm which aren't permeable or provide direct run-off for the water to a porous area, but how likely is it that anyone choosing to carry out such work will view this document? **Other measures** the Council might review are:	Noted. Front and back gardens are an important part of the borough's green infrastructure as recognised in the Local Plan. However, the Council has limited powers to resist change to front gardens. The SPD signposts to the Council's Housing SPD which sets out whether planning permission is required and provides links to websites which include detailed information on how biodiversity can be incorporated into front gardens, even if a parking space is to be created.	

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		(i) Discouraging the practice of placing **hoardings** around front gardens during domestic construction projects and/or using front gardens for storing building materials. If this practice does occur, the reinstatement of the front garden should be required; and (ii) Employing Construction Management Plans more frequently, including an assessment of the use of large vehicles and damage to **street trees**. Street trees are often damaged during building works and the erection/ removal of scaffolding. Street trees could be inspected before and after construction work. Further, the Council's current policy in relation to **basements** (highlighted in the Trees SPD) states: "The provision of any lightwells within Conservation Areas would retain at least two metres or 50% (whichever is the greater) of the original front garden depth, and no less than 50% of the original front garden depth elsewhere in the borough." Many front gardens in Battersea are less than 2m deep, so in Conservation Areas, lightwells cannot be placed in front of houses. Yet for others, front gardens can be reduced to a meaningless strip with no room for planting. This contradicts para 5.32 of the Biodiversity SPD which says: "All areas of green and open space provide biodiversity benefits,	Although the Council has some sympathy with these comments, hoardings are temporary features which are removed post construction. They have a health and safety function and can protect neighbours from disturbance and pollution. Unauthorised instances of damage to street trees would be considered unlawful and should be reported to the Council. Whilst it is recognised that there are limits to what the planning system can deliver in terms of protecting garden land, the Council recognises the importance of private garden land for biodiversity. Several Local Plan policies, including LP5 – Residential Extensions and Alterations, LP6 - Basements and Subterranean Developments and LP7 -	

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		including front gardens. It is encouraged that front gardens and the small areas of landscaping that they contain are retained." Surely it is time to review the basement policy that allows the loss of small front gardens outside of conservation areas? **Back gardens** The current basement policy is similarly permissive in rear gardens. It allows development beyond the footplate of the existing building, which can have an adverse effect on trees and other forms of vegetation in neighbouring gardens as well as the application site. Moreover, the policy advises that: "...extension to an existing basement and subterranean development will only be permitted where: In the case of residential developments, it would extend to no more than a maximum of 50% of the existing rear garden land or other undeveloped garden area." The policy requires a minimum of 1m of soil to be placed over any subterranean development. The wording implies that the policy is restrictive. But is that really the case? Rather it allows sizeable amounts of gardens to be lost and limits the numbers of trees (which are so important to biodiversity) that can planted. Again, the draft SPDs highlights the need for a policy change Might there also be some wording to discourage the use of artificial turf in a domestic setting? Artificial turf does currently have some practical uses in allowing more intensive sport and play to take place, but the extent of its use in back gardens has detrimental effects on biodiversity, as	Residential Development on Small Sites refer to the loss of front or rear gardens and green space. Any review of Local Plan policy will need to be undertaken as part of a future review of the Wandsworth Local Plan. Noted. See above.	

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		well as raising concerns about its production and disposal.		
Environment Agency	E2	**<u>Biodiversity SPD</u>** We would emphasise that all development must adhere to the policies set out within the Local Plan. This is essential to ensure consistency, compliance and delivery of the borough's wider environmental objectives. We welcome the inclusion of setback requirements within the Buffer Zones section (Paragraphs 4.46 to 4.52), which aligns with policy and good practice for sustainable river corridor management. We recommend the following refinements to strengthen the SPD: **Reference to culverts** We suggest inserting a new paragraph at 4.45 to highlight risks associated with culverting and the need to prioritise restoration: *"Sections of watercourse have been buried underground in culverts, causing adverse impacts for flood risk, ecology, maintenance, and health and safety. Where an existing culvert is present at a development site, priority should be given to 'daylighting' the culvert to restore a naturalised open river channel, as well as avoiding construction over existing culverts, in line with Environment Agency policy."*	The majority of the suggested wording provides helpful additional detail which will be incorporated into the SPD.	SPD to be amended to incorporate the following changes: Add a new paragraph following paragraph 4.45 with the following text: <u>"Sections of watercourse have been buried underground in culverts, causing adverse impacts for flood risk, ecology, maintenance, and health and safety. Where an existing culvert is present at a development site, priority should be given to 'daylighting' the culvert to restore</u>

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		Addition to Paragraph 4.48 We suggest adding a paragraph in section 4.48 regarding planting trees in close proximity to flood defences: *"It must be ensured that any new trees do not damage the structural integrity of, or detrimentally impact the access to, flood defences. Where trees are located adjacent to flood defences, tree root protection measures are required to ensure the roots do not damage the flood defence structure. The location of trees should be considered in vehicular/plant tracking diagrams to ensure they do not preclude access to the flood defences.* *Trees close to flood risk management infrastructure should have root containment, be placed in movable planters and have a significant offset relative to their mature canopy spread extent. This is to perverse operational setback access and recognises that tree removal can be difficult due to strong opposition to the loss of established trees."* **Revision of Paragraph 4.52** We recommend broadening the wording to reflect the best-case scenario of fully naturalised setback: *"Naturalised setback of flood defences and restoration of saltmarsh habitat with regraded river banks should be considered to provide fish refuge*	Amendments have been made to the suggested second paragraph to reflect the view of the Council's arboriculturist with regard to planters.	a naturalised open river channel, as well as avoiding construction over existing culverts, in line with Environment Agency policy." Add new paragraphs following paragraph 4.48 with the following text: "It must be ensured that any new trees do not damage the structural integrity of, or detrimentally impact the access to, flood defences. Where trees are located adjacent to flood defences, tree root protection measures are required to ensure the roots do not damage the flood defence structure. The location of trees should be considered in vehicular/plant tracking diagrams to ensure they do not preclude access to the flood defences. *Trees close to flood risk management infrastructure should consider root containment and have a significant offset relative to their mature canopy spread extent. This is to preserve operational setback access and recognises that tree removal can*

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		and wading bird forage. Where regrading banks to at least a 1 in 7 gradient is not feasible, intertidal terracing should be considered. Various restoration techniques can be explored in line with Estuary Edges Guidance (https://www.estuaryedges.co.uk/designprinciples/). Improved fish/eel refuges are encouraged with new pontoons or structures within the watercourse." **Clarification of Biodiversity Net Gain (BNG) assessments** For clarity, Paragraph 4.60 should specify the length of watercourse to be included: *"The Watercourse Unit Module (previously referred to as the Watercourse Metric and/or Rivers and Streams Metric) is one component of the Biodiversity Metric. Any river or stream where the bank top lies within 10m of the red line boundary must be included, with a minimum of 10% net gain of..."* **Reference to existing data sources** We recommend inserting a new paragraph at 4.7 to ensure alignment with existing evidence and opportunity mapping: *"Development should seek to maximise the restoration and enhancement of aquatic habitats, including the implementation of opportunities identified in existing plans and datasets. For instance, the Environment Agency's Catchment*	Suggestion not considered appropriate at this point.	*be difficult due to strong opposition to the loss of established trees."* Amend paragraph 4.52 to read: "~~Ecological terracing to provide fish refuge and wading bird forage should be considered.~~ Naturalised setback of flood defences and restoration of saltmarsh habitat with regraded river banks should be considered to provide fish refuge and wading bird forage. Where regrading banks to at least a 1 in 7 gradient is not feasible, intertidal terracing should be considered. Various restoration techniques can be explored in line with Estuary Edges Guidance. Improved fish/eel refuges are encouraged with new pontoons or structures within the watercourse.

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		Planning System and the GiGL River Restoration Opportunity Map, which contain spatially referenced measures. Development should not prejudice the future implementation of restoration measures contained in the EA's Catchment Planning System."		Insert new paragraph after paragraph 4.60: "Development should seek to maximise the restoration and enhancement of aquatic habitats, including taking account of the implementation of opportunities identified in existing plans and datasets. For instance, the Environment Agency's Catchment Planning System and the GiGL River Restoration Opportunity Map, which contain spatially referenced measures."
Historic England	E3	**Draft Biodiversity SPD (2025)** Thank you for the opportunity to comment on the above consultation document. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process.	The Council acknowledges that wording could be amended to better clarify the relationship between heritage and biodiversity. However, it is considered that development would be considered on a case by case basis.	Amend paragraph 5.21 as follows by adding additional text: 5.21 Developments in conservation areas, or those which could affect other designated and non-designated heritage assets including their

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		We have reviewed the draft Supplementary Planning Document and welcome the fact that the SPD acknowledges there is a relationship between heritage and enhancing nature (paras 5.20-5.21). We are keen to support initiatives which have mutual benefits for biodiversity and the historic environment. However, in rarer cases there is a risk that nature enhancements could potentially have a negative impact on the heritage assets (e.g. tree planting on a scheduled monument or inappropriate planting in the setting of a listed building). As set out in Natural England's Nature Recovery and the historic environment, the core principles in considering the historic environment for nature enhancements schemes are: 1. Consider the historic environment from the outset 2. Maximise environmental benefits including for the historic environment 3. Abide by legal, policy and guidance requirements for the protection and management of the historic environment 4. Avoid damage to the historic environment wherever possible, minimise harm where necessary and mitigate appropriately At present, paragraph 5.21 does not sufficiently emphasise the need to avoid, minimise or mitigate harm to heritage assets, contrary to legal and policy requirements for the protection of heritage. The final		settings, need to carefully consider how biodiversity can be incorporated without adversely impacting on the character, function and preservation of a specific area or asset. There is no one-size-fits-all approach or solution to encouraging biodiversity in the historic environment. Applicants should not presume that a viable and sustainable solution cannot be found or be provided. Ultimately, the merits of a proposal and any potential harm to a heritage asset will need to be considered and assessed on a case-by case basis, as it will depend on site specific circumstances and the significance of the heritage asset/s affected. When managing the relationship between nature enhancements and the historic environment a holistic approach should be taken which accommodates awareness of historic environment sensitivities. Schemes should: 1. Consider the historic environment from the outset

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		sentence in para 5.21 appears to accept harm to heritage assets rather than seeking to avoid or minimise it. We suggest it is deleted and replaced by the following text. "When managing the relationship between nature enhancements and the historic environment a holistic approach should be taken which accommodates awareness of historic environment sensitivities. Schemes should: 1. Consider the historic environment from the outset 2. Maximise environmental benefits including for the historic environment 3. Abide by legal, policy and guidance requirements for the protection and management of the historic environment 4. Avoid damage to the historic environment wherever possible, minimise harm where necessary and mitigate appropriately		2. Maximise environmental benefits including for the historic environment 3. Abide by legal, policy and guidance requirements for the protection and management of the historic environment 4. Avoid damage to the historic environment wherever possible, minimise harm where necessary and mitigate appropriately.
Louis Cole	E4	**4.15 Mitigation and Enhancement Standards p.22** Please emphasise that new developments should include integrated swift bricks wherever possible, as stated in the government's own legislation guidance (reference below). Integrated swift bricks are superior to external swift boxes, and are ideal artificial nest features which support a range of birds species in addition to swifts. Please omit reference to swift 'boxes' to avoid confusion. Installation of swift bricks should comply with British Standard	It is noted that SPDs, along with the NPPF & NPPG are material considerations when planning applications are determined, but do not form part of the development plan. The response has been taken into account and appropriate amendments to the SPD are proposed.	Amend the third bullet point in the green box following paragraph 4.15 as follows: "For house sparrows, installing appropriate nesting bricks or boxes on new and existing buildings is similarly a high priority. ~~House sparrow 'terraces', which are boxes with two or three separate chambers~~

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		specifications (BS 42021) and be installed with an average minimum ratio of 1:1 per residential unit. https://knowledge.bsigroup.com/products/integral-nest-boxes-selectionand-installation-for-new-developments-specification-1/standard Reference should be made to the NPPG Natural Environment 2025 paragraph 017: https://www.gov.uk/guidance/natural-environment#biodiversity-geodiversity-and-ecosystems 'The National Planning Policy Framework expects development proposals to bolster wildlife by incorporating features which support priority or threatened species such as swifts, ...The use of swift bricks is particularly important in this context because swifts rely on urban cavities for nesting, and the national loss of suitable nesting sites through building renovation has been part of the reason for the species' decline. Developments should include integrated nest boxes (commonly known as swift bricks) where possible, with the general aim across a development of a minimum of one nest box per unit. Nest boxes can provide important habitat for other species as well as swifts, such as starlings and sparrows.....' Please delete the text recommending installation of house sparrow terraces. House sparrows are not	For new developments, swift bricks are likely to be considered to the preferred option. However, for redevelopment of existing sites, swift boxes may be more appropriate. Guidance for which would be suitable will be considered on a case-by-case basis and left to the discretion of Council officers.	~~and entrances are considered most effective.~~ House sparrows are also known to use swift boxes." Amend text in blue box below green box following paragraph 4.15 to read: For more details, please see: ~~Installing house sparrow nest boxes, British Trust for Ornithology.~~ ~~Swift box instructions, Royal Society for the Protection of Birds.~~ https://www.actionforswifts.com/ https://www.swift-conservation.org/

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		avid users of sparrow terraces and instead prefer to nest in swift bricks and swift boxes. Members of the tit family of birds often choose to nest in sparrow terraces. Blue tits, great tits and coal tits are not endangered and do not nest in colonies. Please omit reference to RSPB's 'swift box instruction'. Instead signpost specialist expertise on creating artificial swift nests by referring instead to: https://www.actionforswifts.com/ and https://www.swift-conservation.org/ **5.37 Encouraging biodiversity in private gardens p.38** Please clarify the type of artificial nest features recommended for swifts and house sparrows. The ideal product is the swift brick, which is considered to be a universal bird nesting feature. Where swift bricks cannot be installed, swift boxes are an alternative. All artificial swift nests are attractive to house sparrows, and sparrow terraces are therefore not required and are not effective in promoting house sparrow numbers. **5.4 Biodiversity net gain p.34** Please emphasise the following: 1. Provision of greenery, such as shrubs and trees etc, and other green enhancements, does not offer nesting habitat to swifts.	Table to be amended to correspond with earlier amendments. Noted.	In table after paragraph 5.37 reword bullet point to read: * Swift **bricks** and ~~house sparrow~~ boxes.

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		2. Inclusion of artificial swift nest sites in new developments will not register a value on the Biodiversity Net Gain calculation.		
Mike Priaulx	E5	4 Guidance on Protected species and priority habitats (Swifts and house sparrows) Note that the draft London LNRS issued today (30/09/25) features swift bricks (measure S35), but does not mention sparrow terraces. See the first "...Priorities..." document here: https://londonlnrs.commonplace.is/en-GB/proposals/v3/document-library?step=step1 Please delete the line regarding house sparrow terraces from the green text box on page 22, as it is not required because swift bricks provide nest sites for sparrows, and it's not in line with London or national planning policy guidance.	The response has been taken into account and appropriate amendments proposed.	See amendment to paragraph 4.15 above.
National Highways	E6	We understand each of the three SPDs has been prepared to provide further guidance for how planning applicants should address certain issues when seeking planning permission. We have no comments on the three documents. We will continue to discharge our statutory consultee responsibilities and will work collaboratively with the Council and planning applicants to manage development and ensure the effective operation of the SRN.	Noted.	None
Natural England	E7	Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed	Noted.	None

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		for the benefit of present and future generations, thereby contributing to sustainable development. Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature. Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment. Should the plan be amended in a way which significantly effects its impact on the natural environment, then, please consult Natural England again.		
Mike Priaulx obo Swifts Local Network: Swifts & Planning Group	E8	4 Guidance on Protected species and priority habitats (Swifts and house sparrows) The current references in the green text box on page 22 to "swift bricks" are very welcome, however they do not currently align with national planning guidance. As a minimum, please include wording from National Planning Policy Guidance (NPPG) Natural Environment 2025 paragraph 017 (see below in suggested revised text), and in particular the text requiring at least one swift brick per dwelling on	Please see comments in relation to respondent E4.	Please see amendments in relation to respondent E4.

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		average for new developments, and swift bricks being suitable for other species, and therefore a universal nest brick. The National Planning Policy Framework expects development proposals to bolster wildlife by incorporating features which support priority or threatened species such as swifts, bats and hedgehogs. The use of swift bricks is particularly important in this context because swifts rely on urban cavities for nesting, and the national loss of suitable nesting sites through building renovation has been part of the reason for the species' decline. Developments should include integrated nest boxes (commonly known as swift bricks) where possible, with the general aim across a development of a minimum of one nest box per unit. Nest boxes can provide important habitat for other species as well as swifts, such as starlings and sparrows. Extensive guidance is available on wildlife friendly features, including the National Design Guide and National Model Design Code which illustrate how well-designed places can support rich and varied biodiversity by facilitating habitats and routes for wildlife. More specific support for the selection and installation of swift bricks can be found in the British Industry Standard BS 42021:2022, and the Future Homes Hub Homes for Nature Guidance.		

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		4 Guidance on Protected species and priority habitats (Swifts and house sparrows) The sentence in the green text box on page 22 refering to sparrow terraces should be removed, because: * there is no reference to sparrow terraces in national planning guidance, due to low levels of usage by sparrows and poor flexibility for use by other species, meaning they often remain unused. NHBC Foundation report confirms swift bricks as a universal nest brick: Biodiversity in New Housing Developments (April 2021) Section 8.1 Nest sites for birds, page 42: "Provision of integral nest sites for swifts is through hollow chambers fitted into the fabric of a building while in construction [i.e. swift bricks]. Although targeting swifts they will also be used by house sparrows, tits and starlings so are considered a 'universal brick'". https://www.nhbc.co.uk/foundation/biodiversity-in-new-housing-developments * National Planning Policy Guidance (NPPG) Natural Environment 2025 paragraph 017 requires swift bricks as I stated above, and also sets out their benefit as a universal nest brick as other species (including sparrows) use them.		

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		https://www.gov.uk/guidance/natural-environment * Therefore, sparrow terraces are taking up space and budget that should be used on universal nest bricks, i e. swift bricks, or external swift boxes where necessary which also allow sparrows to nest. Therefore, the sparrow terrace sentence can be removed and the guidance is relevant without it. Delete the sentence regarding sparrow terraces from the green text box on page 22. There can be high levels of non-compliance with planning conditions as found by the 2024 Lost Nature report by Wild Justice. https://wildjustice.org.uk/general/lost-nature-report/ Evidence of suitable installation should be provided on completion in the form of photographs, or post-construction sign-off by an ecologist.	Issues related to enforcement and non-compliance of conditions are a matter for the Council's Enforcement Team.	
Michael Priaulx obo Swifts Local Network: Swifts & Planning Group	E9	The current references in the green text box on page 22 to "swift bricks" are very welcome, however they do not currently align with national planning guidance. In particular, the sentence in the green text box on page 22 refering to sparrow terraces should be removed, because:	Please see comments in relation to respondents E4 and E8.	Please see amendments in relation to respondent E4.

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		* there is no reference to sparrow terraces in national planning guidance, due to low levels of usage by sparrows and poor flexibility for use by other species, meaning they often remain unused. https://cieem.net/swift-bricks-the-universal-nest-brick-by-dick-newell/ https://actionforswifts.blogspot.com/2014/11/how-to-help-house-sparrows.html?m=1 * National Planning Policy Guidance (NPPG) Natural Environment 2025 paragraph 017 requires swift bricks and sets out their benefit as a universal nest brick as other species (including sparrows) use them. https://www.gov.uk/guidance/natural-environment * Therefore, sparrow terraces are taking up space and budget that should be used on universal nest bricks, i e. swift bricks, or external swift boxes where necessary which also allow sparrows to nest. Therefore, the sparrow terrace sentence can be removed and the guidance is relevant without it.		
Vickesh Rahod obo DPDS Ltd	E10	**Biodiversity SPD** We welcome the intent of this SPD to provide clear guidance as to how biodiversity can be considered and incorporated at each stage of the development process, including detailed information about how proposals can ensure biodiversity is considered and enhanced in the borough. We welcome the specific guidance relating to ***starlings*** (a 'red list' bird of high conservation	Support noted.	Add a new paragraph following paragraph 5.21 with the following text: **"Tall Buildings** Tall buildings offer a unique opportunity in the borough to bring forward specific kinds of biodiversity benefits which are

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		concern) and the plan showing starling records in the borough with an emphasis on records in the last 10 years. It is noted that new developments can play an important role in preventing further harm to and supporting the recovery of starlings through the actions set out (i.e. installing nest boxes), however it is not clear if this guidance is reaching applicants/developers. For example, no reference was made to 'starlings' in the Preliminary Ecological Appraisal for the application at 1 Battersea Bridge Road (ref. 2024/1322), despite the site being in an area identified as having records within the last 10 years. We also welcome the specific guidance relating to tall buildings, in the context that they might mimic cliff ledges, which are the primary natural habitat of ***peregrine falcons*** which are given the highest degree of legal protection under Schedule 1 of the Wildlife and Countryside Act 1981. We note the guidance *"It is important that the nesting sites of these birds are protected, that artificial nests are installed at appropriate locations and building managers and occupiers are made aware of their significance and protected status"*. These requirements should be made clear to developers proposing tall buildings as early as possible, such as the pre-application stage.	This SPD is yet to be adopted. Following adoption, the SPD encourages productive discussions regarding biodiversity at pre-application stages to ensure developers of tall buildings are aware of any biodiversity considerations. The response has been taken into account and appropriate amendments relating to tall buildings proposed.	not possible for medium or low-rise developments. Many tall buildings will not have significant space at ground level to create biodiverse rich landscapes, however, the potential does exist for extensive green walls and roofs that make the most of the development's height. The following considerations should be discussed from the initial stages of the development process when a tall building is being planned. The peregrine falcon's natural habitat consists primarily of cliff ledges. These birds are attracted to the built environment where tall buildings and other structures mimic this habitat. The species also act as a natural predator of pigeons, and parakeets. It is important that the nesting sites of peregrine falcons are protected, that artificial nests are installed at appropriate locations and building managers and occupiers are made aware of their significance and protected status. . Peregrine falcons are

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		We note that specific section on 'Aquatic and Riverine environment', however we believe more emphasis needs to be made on the impact of riverside development, particularly tall buildings, on these habitats. Indeed, the Environment Agency raised an objection to the proposed 28-storey development at 1 Battersea Bridge Road (ref. 2024/1322) for multiple reasons including "*impact on Thames frontage habitats and missed opportunity for enhancement*". This demonstrates that developers (and their consultants) are not being made aware of all biodiversity mitigation/enhancement requirements at the earlies stage of the planning process (i.e. pre-application). We also note that reference is made throughout the SPD to the potential for applicants/developers to demonstrate 'exceptional circumstances', for instances where objectives such as Urban Greening Factor (UGF) cannot be met on site. As previously discussed, we are of the view that financial contributions in lieu of on-site mitigation should be a last resort, and the bar should be set high for demonstrating exceptional circumstances. For example, a small site footprint should not be an exceptional circumstance – this simply means that the site is not capable of delivering/ mitigating the scale of development proposed.		also known to be territorial and artificial nests should not be installed close to any existing nests. Tall buildings can pose a threat to birds if there is not the correct type of glass or materials in place to deter bird strike. Considering these impacts at the earliest stages of development can avoid issues of bird strike from the outset. The roofs of tall buildings offer uniquely dark environments when not adjacent to even taller buildings or sources of light. These present opportunities for biodiversity which naturally thrives in particularly dark environments. Delete last sentence of para 4.29 and replace with "Please see section on tall buildings."

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		We believe that there would be benefit in making explicit reference to 'tall buildings' proposals within the SPD, so that developers of such schemes are clearly aware of how they are expected to meet biodiversity objectives. These requirements should be communicated to developers as early as possible, such as the pre-application stage.		