

Page: Client or Agent details (Consultations)

- First name Michael
- Last name Priaulx
- Your address [REDACTED]
- Telephone number [REDACTED]
- Email address [REDACTED]
- Preferred contact method Email
- Is an agent representing you No

Page: Local Plan Legal Compliance

- Do you consider the Local Plan to be legally compliant Yes

Page: Local plan Soundness

- Do you consider the Local Plan to be sound No
- Why do you believe the Local Plan is unsound C) It is not effective, D) It is not consistent with national policy
- Why do you feel that the Local Plan is unsound We support paragraphs 5.96 - 5.98, to protect biodiversity, and in summary we also support the text relating to "swift nest bricks" in paragraph 5.92 of Policy DM04: Biodiversity Net Gain but it is not currently sound as not effective nor consistent with national policy because there is no reference to best-practice guidance and it only relates to "small sites where there is minimal loss of habitat of low ecological value". NPPG 2019 Natural Environment paragraph 023 highlights the value of swift nest bricks to all types of development. Swift bricks are a universal nest brick for small bird species suitable for any locations and development type, but swift bricks are excluded from the mandatory DEFRA Biodiversity Net Gain (BNG) methodology, so need their own clear policy for all developments. In more detail for supporting evidence, the reason for this is that nest sites in buildings and bird boxes/ bricks and other species features are excluded from the DEFRA Biodiversity Net Gain metric, so require their own clear policy. The Government's response in March 2023 to the 2022 BNG consultation stated that: "We plan to keep species features, like bat and bird boxes, outside the scope of the biodiversity metric... [and] allow local planning authorities to consider what conditions in relation to those features may be appropriate" (page 27, https://consult.defra.gov.uk/defra-net-gain-consultation-team/technicalconsultation_biodiversitymetric/). Swift bricks are the only type of bird box specifically mentioned as valuable to wildlife in national planning guidance, along with bat boxes and hedgehog highways (NPPG Natural Environment 2019 paragraph 023). The National Model Design Code Part 2 Guidance Notes (2021) also recommends bird bricks (Integrating Habitats section on page 25, and Creating Habitats section on page 26). Swift bricks are considered a universal nest brick suitable for a wide range of small bird species including swifts, house sparrows and starlings (e.g. see NHBC Foundation: Biodiversity in New Housing Developments (April 2021) Section 8.1 Nest sites for birds, page 42: https://www.nhbcfoundation.org/wp-content/uploads/2021/05/S067-NF89-Biodiversity-in-new-housing-developments_FINAL.pdf). Swift bricks are significantly more beneficial than external bird boxes as they are a permanent feature of the building, have zero maintenance

requirements, are aesthetically integrated with the design of the building, and have better thermal regulation with future climate change in mind. Therefore, swift bricks should be included in all developments following best-practice guidance (which is available in BS 42021:2022 and from CIEEM (<https://cieem.net/resource/the-swift-a-bird-you-need-to-help/>)). The UK Green Building Council (UKGBC) is a membership-led industry network and they have produced a document entitled: "The Nature Recovery & Climate Resilience Playbook" (Version 1.0, November 2022) (<https://ukgbc.org/resources/the-nature-recovery-and-climate-resilience-playbook/>). This document is designed to empower local authorities and planning officers to enhance climate resilience and better protect nature across their local area, and includes a recommendation (page 77) which reflects guidance throughout this document: "Recommendation: Local planning Authorities should introduce standard planning conditions and policies to deliver low cost/no regret biodiversity enhancement measures in new development as appropriate, such as bee bricks, swift boxes [and bricks] and hedgehog highways." Many local authorities are including detailed swift brick requirements in their plans, such as Tower Hamlets Local Plan Regulation 19 stage (paragraph 18.72, page 328 - <https://talk.towerhamlets.gov.uk/local-plan>), which follows the exemplary swift brick guidance implemented by Brighton & Hove since 2020, and Wiltshire Local Plan Regulation 19 stage, which requires an enhanced number of 2 swift bricks per dwelling (policy 88: Biodiversity in the built environment, page 246 - "As a minimum, the following are required within new proposals: 1. integrate integral bird nest bricks (e.g., swift bricks) at a minimum of two per dwelling;" <https://www.wiltshire.gov.uk/article/8048/Current-consultation-Reg-19>), and Cotswold District Council are proposing three swift bricks per dwelling in their current Local Plan consultation (Policy EN8 item 6, and paragraph 0.8.4, <https://www.cotswold.gov.uk/planning-and-building/planning-policy/local-plan-update-and-supporting-information/>), so such an enhanced level should also be considered.

- What changes do you consider necessary, in order to make the Local Plan sound Please add to Policy DM04 paragraph 5.92: "Swift bricks are a universal nest brick for small bird species, and should be installed in new developments including extensions in accordance with best-practice guidance such as BS 42021 or CIEEM."
- Have you raised this matter(s) at an earlier stage in the preparation of the Local Plan No
- If no, please explain Had not seen consultation.

Page: Local plan additional comments

- Please provide any additional comments in support of your representation Swifts Local Network are a national network of over 100 local swifts groups who aim to support swifts and other endangered urban bird species.
- Do you wish to participate at the hearing sessions Yes
- Please outline why you consider this to be necessary To provide further information, if required.
- How did you find out about this consultation Other
- What other way did you hear about this consultation Social media (X)