

Wimbledon Swift Group

To Future Merton

In addition to my previous comments for the Merton Local Plan below, please incorporate the following extract from the London borough of Camden local plan:

"Wildlife in the UK is protected under the Wildlife and Countryside Act (1981) (as amended). Before you start any works to your property you need to make sure wildlife and protected species would not be affected. In Camden, species most likely to be affected by development are nesting birds, bats, hedgehogs and reptiles. Any works that would affect breeding birds and their nests, such as works of demolition, vegetation removal or site clearance, should be done outside the nesting season from 1st of March to 31st July inclusive. To help wild birds you can install bird boxes within your garden or 'swift bricks' within external walls, in a shaded location. The Royal Society for the Protection of Birds can provide advice on how to retain or create nesting spaces within the eaves. Also note that any scaffolding even for minor external works can prevent birds accessing their nest sites in buildings."

<https://www.camden.gov.uk/documents/20142/4823269/Home+Improvements+CPG+Jan+2021.pdf/599e6974-0998-3259-ab90-03d89aef251b?t=1611580550025>

page 27 of the Home Improvements guide

To Future Merton Team, in relation to the New Local Plan:

Regarding the sections of the New Local Plan relating to Strategic Policy 08 aspirations and justifications as follows:

'.....Protecting and enhancing the boroughs biodiversity...'

'.....providing habitats for biodiversity to flourish and expand....'

'....improving opportunities for residents to experience nature....'

'...All developments will be expected to incorporate elements of green infrastructure to enhance biodiversity.....and be required to contribute net gains in biodiversity.....through such features as bird and bat boxes....'

'...we aim to protect and enhance biodiversity....we will secure measures that enhance nature conservation value...'

'....the protection and enhancement important.....particularly in the context of biodiversity loss due to development pressure.....the area is home to protected species and habitats of value to biodiversitybuildings provide roosting sites for bats and nesting opportunities for birds.....'

Comments:

Please add the following text, consistent with NPPG 2019 Natural Environment Paragraph 023, where specific reference is made to 'swift bricks' in terms of 'how can biodiversity net gain be achieved' (referenced below):

'Built-in nest boxes, such as swift bricks, are preferable to external nest boxes, as they are integrated into the building, cannot be removed, provide better temperature control and require less maintenance. They are also considered "universal" nest bricks, as they provide nesting spaces for a wide range of small bird species. Unless circumstances are demonstrated to make the swift brick impractical, this system should be chosen over external nest boxes.' (see leaflet attached)

This text has been adapted from the Brighton & Hove Council guidance note for provision of artificial nest sites for swifts and other birds in new developments:

<https://www.brighton-hove.gov.uk/planning/planning-applications/guidance-note-provision-swift-boxes-including-swift-bricks-new>

Supporting policy:

National Planning Policy Framework 2019

Section 15, Clauses 170 (d) and 174 (b)

<https://www.gov.uk/government/publications/national-planning-policy-framework--2>

Requirement for '.....net gains for biodiversity through the inclusion of wildlife-friendly features in construction work.'

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.....'

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>

The Government's Environment Bill supports interventions to which building design can contribute 'biodiversity net gain' (as stated by the Under Secretary of State, MP Rebecca Pow, DEFRA (see attached letter).

The Mayor's Publication London Plan requires new developments to include features, such as artificial nest sites, in order to protect, conserve and promote priority species in the urban context.

https://www.london.gov.uk/sites/default/files/draft_london_plan_-_showing_minor_suggested_changes_july_2018.pdf

Policy G6 Biodiversity and access to nature: B, (3), (4), D and E.
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Justification:

Swifts need urgent conservation action, as they are technically 'endangered' according to the BTO's species list of conservation concern criteria, their population having declined by 53% between 1995 and 2016. Swifts' natural nest sites are spaces in the lofts and walls of buildings, accessed through gaps. These spaces are being steadily lost through swift-hostile modern building practices. Swifts are nest-faithful, and do not readily find and adapt to new nest sites. However, it is considered that provision of artificial nest spaces will gradually compensate for the disappearance of natural sites.

Information on the serious decline of UK swift populations, and ways to reverse this trend, can be found in the following publications:

Action for Swifts (leaflet attached):

<https://actionforswifts.blogspot.com/p/afs-products.html>

Chartered Institute of Ecology and Environmental Management, issue 104, June 2019:

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

Research carried out on Royal Duchy properties, on the effectiveness of universal nest bricks in attracting nesting birds, The Duchy Box Survey (2020), concluded that after only one breeding year, of the total number of swift bricks (628) installed over various developments in parts of Cornwall and Dorset, 294 were used. The boxes were most commonly occupied by house sparrows, followed by house martins, starlings and swifts. Apart from delivering biodiversity net gain, the project has been successful in connecting local residents with nature (see report attached).