

Introduction by : Cllr Martin Whelton Cabinet Member for Regeneration, Housing and Transport

*‘.....it also sets out how the council will guide development.....whilst continuing to protect the borough’s**natural environment**. Key to this will be the **built environment**, in the way our public realm and streets are designed provides **opportunities** for communities to interact and meet, but also in **ensuring high quality design of new buildings throughout the borough***

The overarching aim of the Local Plan should also be to protect and enhance biodiversity across the borough through using the improved built environment where there is potential.

Strategic Objectives:

1.24. At least 6,200 new homes will have been built by 2036 in Merton

1.25. The most significant change will have taken place in Morden town centre

1.26. By 2036 Wimbledon will have seen largely incremental change on sites within the town centre that are not required for Crossrail2. The refurbishment or redevelopment of sites along Wimbledon Broadway, around Hartfield Road and on St George’s and Worple Road through plan-led approach co-ordinating building design, layout, materials and the public spaces around the site will have led to a real step-change.

1.27. Colliers Wood is one of the key town centres in the Mayor of London’s Opportunity Area (which also encompasses Wimbledon, South Wimbledon and Morden town centres).

The massive increase in homes planned across Merton will provide a once-in-a-lifetime opportunity to help swifts, through the large-scale provision of artificial nest sites within all the new homes and developments.

1.30: Tackling climate change, and the effects of climate change remains at the heart of Merton’s planning policies.

There should be a strategic objective to tackle not just climate change, but importantly to tackle species extinction within Merton. Swifts in particular are easy to assist through incorporating artificial nest sites into new buildings. This is needed because swifts now qualify for ‘endangered’ status on the BTO’s species list of conservation concern (BoCC) and will be moved to the ‘Red’ category at the next revision in 2021, indicating ‘a need for urgent conservation action’.

<https://www.rspb.org.uk/birds-and-wildlife/wildlife-guides/uk-conservation-status-explained/>)

Loss of natural nest sites (spaces in the lofts and walls of buildings, accessed through gaps) is believed by experts to be the overriding reason for the huge decline in swift numbers in the UK. This loss of breeding habitat occurs because modern buildings lack eaves access or other small cavities. Swifts are nest-faithful and cannot easily find alternative nest sites when needed, unlike most other birds.

The National Planning Policy Framework, February 2019, calls for net gains for biodiversity, and there is particular emphasis on helping our swift population in an update July 2019,

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

and

<https://www.gov.uk/government/news/protect-birds-when-building-says-james-brokenshire>

It is easy to help swifts when carrying out building work, and the article below, published by the Chartered Institute of Ecology and Environmental Management, Issue 104, June 2019, explains the seriousness of swift declines, and describes what can be done in property renovation and new builds to increase swift populations.

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

Strategic objective 1: Healthy places

c. Improving access to nature and leisure facilities including opportunities for sport, physical activities, play and relaxation;

The presence of swifts across Merton would bring nature to the local population without the need to leave the urban surroundings.

Strategic Objective 2: Place

f. Enhancing existing open spaces and the natural environment, providing adequate habitats for biodiversity to flourish and expand; g. Protecting and enhance the borough's biodiversity, including trees and landscape, both within open spaces but also within the built environment.

Providing swift breeding habitat through the creation of new artificial nest sites would contribute to meeting the above strategic objective with little expense and should be specified in routine planning guidelines.

Strategic Objective 4: Environment

a. Mitigating and adapting to the challenges of climate change

There should also be a strategic objective to mitigate against the loss of biodiversity in Merton, with provision of artificial swift nest sites an easy route to helping our threatened swifts.

Strategic Policy HW2.1 Health and wellbeing

Policy N3.6 Wimbledon Town Centre

Surrounding neighbourhoods of Wimbledon

n. Supporting environmental improvements and.....

Strategic Policy H4.1 Housing choice

4.1.2. National and regional guidance indicates that being able to access decent affordable accommodation is a major factor in improving quality of life. Accommodation standards and affordability have a strong influence on other issues which contribute to quality of life, including health, crime, education and skills.

Quality of life and wellbeing are improved with access to nature :

Swifts liven-up the summer skies with their super-fast flight and high pitched calls. Observing swifts can become a lifelong interest for anyone who loves birds, which creates a wellbeing factor and connection with other swift enthusiasts.

Strategic Policy LP D5.1 Placemaking and design

The council will require all development to be of the highest design quality, supports vitality and viability of its town and local centres and long-term economic prosperity and quality of life. a) Proposed development must demonstrate:

- i. That it is designed according to well established principles of good urban design, as referred to in the **National Planning Policy Framework and practice guidance**, development plan policies and existing and emerging good practice guidance;

Justification:

5.1.4. The National Planning Policy Framework 2018 (NPPF) provides national policy guidance on design. This policy is a strategic policy, produced in accordance with para 20.d) of the NPPF. It looks to create sustainable neighbourhoods that will last well beyond the plan period and not require future public or private sector intervention to address future strategic or structural issues.

The above strategic policy should include measures to safeguard and promote biodiversity, as per national guidance (NPPF 2019) which specifies swifts as a priority species.

5.1.8. Outstanding and innovative designs and high levels of sustainable development will be promoted and given weight in planning decisions.

This should include identified measures to promote biodiversity and in particular, swift conservation.

Strategic Policy O8.1

We understand the key role that having accessible open space and green infrastructure plays in ensuring the health and wellbeing of all people. We aim to make Merton an attractive and green borough, through the protection and enhancement of open space, green infrastructure and the natural environment.

- c) Enhancing existing open spaces and the natural environment, providing habitats for biodiversity to flourish and expand;
- d) Protecting and enhancing the borough's biodiversity, particularly on sites of recognised nature conservation interest, and supporting the objectives of the borough's Biodiversity Action Plan and the Mayor's Biodiversity Strategy;
- e) Encouraging new green links, green corridors and islands to seek to reduce areas of deficiency in nature conservation and to create safe species movement and havens for nature;

Swift conservation has never previously been a specific objective of Merton Council but swifts should become a target species for conservation measures, due to the endangered situation this migrant bird is now in in the UK. Swifts are dependent on spaces in our buildings in which to nest and due to the loss of natural spaces in buildings of all sorts, swift numbers have plummeted, and are continuing to do so. The answer lies in providing artificial swift nest sites on a massive scale to compensate for the deficiency in nest sites.

Policy O8.2 Open Space and Green Infrastructure:

- g. Require that any proposals for new dwellings in back gardens are justified against the:

iii. biodiversity value of the site.

8.2.3. The council is currently undertaking a review of all the green infrastructure, biodiversity and open spaces throughout the borough and will have a draft strategy in early 2019.

All proposals for new dwellings should include consideration of their value to swifts in relation to providing nest sites. The provision of new artificial nest sites should be incorporated in the draft strategy mentioned above.

Policy O8.3

e. Require, where appropriate, development to integrate new or enhanced habitat or design and landscaping which encourages biodiversity and where possible avoid causing ecological damage. Developers must propose full mitigation and compensation measures for any ecological damage that is caused;

As per previous comments, development should integrate enhanced habitat for nesting swifts through incorporating swift bricks or boxes into all development projects, large and small. Every house could provide several swift nests when roof work or house extension is carried out, and there should now be an expectation that swift conservation will be a goal for all building projects, not just new developments.

*Sustainability Appraisal incorporating Strategic Environmental Assessment (SEA): Stage A
This report is the Strategic Environmental Assessment (SEA) and Sustainability Appraisal for Merton's new Local Plan, Scoping Report.*

II. SEA Regulations 2004 Schedule 2 (6) states that:

The likely significant effects on the environment, including short, medium and long term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues such as—

- a) biodiversity;*
- d) fauna;*

There should be particular attention paid to the loss of natural swift nest sites through destruction of the gaps and spaces these birds use in buildings. There should be an analysis of increased nesting habitat for swifts through policies which promote installation of artificial nest sites, with the objective of conserving existing nest sites and providing new ones on a large scale across the borough.

Habitat Regulation Assessments

2.3: The EU directive on the conservation of natural habitats and wild fauna and flora¹, also referred to as the 'habitats directive', provides legal protection for habitats of exceptional European importance. Article two of the directive requires the restoration and maintenance of habitats and species to a favourable conservation status and subsequent articles set up the means to designate protection areas. These are either set up as special areas of conservation (sac) or special protection areas (spa) depending on the protection aim.

Swifts are not currently protected by law but as they qualify for 'endangered' status on the BTO's species list of conservation concern, and need urgent conservation action, swifts should be a target for conservation measures, in order to restore a favourable conservation status. The action required would be to artificial nest sites on a huge scale across the borough.

Key findings from the review of plans analysis:

5.5 There is a clear hierarchy of plans and programmes in certain areas descending from the international/European and/or national level through to the local level. The implications for a Local Plan generally, tend to become more specific and precise at the local level and regional level. S

5.6 The National Planning Policy Framework (NPPF) 2018, states that strategic policies are required for the area of each local planning authority should include those policies, and strategic site allocations, necessary to provide:

i) of the natural, built and historic environment, including landscape and green infrastructure

5.9 The NPPF is a key planning document whereby; at its heart is a presumption in favour of sustainable development, which should be seen as a 'golden thread', running through both plan making and decision taking. Key areas of sustainable development are change, protecting and enhancing the natural, built and historic environment,..... Sustainable development should therefore be at the heart and a core principle of the Local Plan.

The above key findings support my request that there be a specific policy in this Local Plan to focus on swifts, so that the proposal of increasing artificial nest sites for swifts can be translated into practical action.

Biodiversity and nature conservation

5.20 Policies should ensure that areas designated for nature conservation purposes, threatened species and habitats are protected and that development does not have any detrimental impacts on biodiversity. The aim should always be to enhance biodiversity wherever possible. The Local Plan should also plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure.

Policies should specifically highlight swifts as a target species for conservation since they are not birds which are well known to most people, unlike familiar garden birds.

11 Developing sustainable objectives and framework (Task A4)

Biodiversity: To protect and conserve Merton's biodiversity from adverse development, avoid damage and irreversible losses to designated sites and protected species, adding to the abundance of non-designated biodiversity features and habitats (such as trees, gardens, green roofs and other features).

Swifts are at risk of irreversible losses due to relentless loss of their breeding habitat ie, the sealing up of longstanding gaps and spaces in eaves and walls. Therefore, swifts should be specified as a species which is critically threatened and requires, not only protection from breeding habitat loss, but mass provision of new artificial nest sites.

12 SA Assessment Framework and Decision Making Criteria

.....Criteria:

Does it support ecosystems and lead to any enhancements in biodiversity, particularly in non- designated sites?

This should be applied to swifts in particular, as a species which is not protected by law but which is technically 'endangered' in the UK and in 'need for urgent conservation action.