

From: [michael priaulx](#)
To: [Neighbourhood, Planning: WCC](#)
Cc: [Edward Mayer](#)
Subject: ReprFitzrovia West Neighbourhood Plan 2020-2035
Date: 03 August 2020 20:49:56

Dear Fitzrovia West consultation

Below is our representation with regard to the Fitzrovia West Neighbourhood Plan 2020-2035,

on behalf of Swift Conservation (<https://www.swift-conservation.org/>).

Many thanks.

Regards,

Michael Priaulx and Edward Mayer,
Swift Conservation.

The Section 7 Green & Open Space chapter includes worthwhile proposals to protect and enhance green space but does not refer to biodiversity, and in particular the many species of endangered urban birds that could occupy a city centre location with provision of nest sites which are currently in short supply. These species include house sparrows, pied wagtails, and swifts. Bats are also present in central London and would greatly benefit from additional roosting sites.

These measures are supported by national planning guidance (e.g. NPPG Natural Environment July 2019 - full details below), and the Westminster Biodiversity Action Plan.

Therefore to meet the Basic Conditions of having regard to national policies and advice, and contributing to the achievement of sustainable development,

we request you add to paragraph 7.2, pages 33-34:

"• plant new trees and create new green landscape features on streets or as part of redevelopments; • Make full use of green roofs, walls and other forms of street planting."

ADD: • Include integrated measures for biodiversity such as swift bricks and bat boxes.

We also request you add to policy GS2, paragraph 7.4, page 36:

"Policy GS2: Creating New Green and Open Spaces 1.All new major development should incorporate an appropriate and well-designed new open or green space. Appropriate provision should include living roofs, living walls and ecologically sensitive landscaping..."

ADD: including integrated measures for biodiversity such as swift bricks and bat boxes.

This is in accordance with government guidance as follows:

NPPF 2019 requires: "*providing net gains for biodiversity*" (Clause 170 (d), page 149).

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

NPPG July 2019 guidance on the Natural Environment states: "*Relatively small features can often achieve important benefits for wildlife, such as incorporating 'swift bricks' and bat boxes in developments*" (Paragraph: 023, Reference ID: 8-023-20190721).

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

The government press release from James Brokenshire, the Communities Secretary at the time of the NPPG Natural Environment publication (21/07/19), stated: "*For the first time the government has set out its expectations on how developers can protect specific species, including using 'hedgehog highways' and hollow swift bricks – which are installed into the walls of new build homes, allowing the birds to nest safely. This follows public interest for protecting these much-loved animals, with one petition receiving support from over half a million people.*"

<https://www.gov.uk/government/news/brokenshire-orders-house-builders-to-protect-wildlife>

The Government's Building Better Building Beautiful Commission report "*Living With Beauty*" (30/01/20) recommends: "*Bricks for bees and birds in new build homes*" (Policy Proposition 33, page 110).

<https://www.gov.uk/government/publications/living-with-beauty-report-of-the-building-better-building-beautiful-commission>

The Westminster Biodiversity Action Plan 2019 includes a house sparrows action plan pages 50-56, flagship species: swift on page 8, bats action plan on pages 42-46), and recommends creating nesting and roosting sites in these action plans.

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