



Outlook

comments - Maida Hill Neighbourhood Plan, Design Guidance & Codes.

From Mike Priaulx <[REDACTED]>

Date Mon 11/11/2024 15:05

To Neighbourhood, Planning: WCC <neighbourhoodplanning@westminster.gov.uk>

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Dear Neighbourhood Planning team,

I am writing to provide comments for the above consultation, on behalf of the Brent & Westminster Swifts Group - we are a community wildlife conservation organisation founded in the Maida Vale area in 2021.

My comments apply equally to the Neighbourhood Plan, and Design Guidance & Codes, and are general comments not relating to a specific paragraph.

The documents are generally thorough and well researched but at present they are not sound as not consistent with national planning policy and do not achieve sustainable development with regard to provision of nest sites for endangered red-listed bird species resident in the area.

In summary, please add to the neighbourhood plan and/ or design code:
Swift bricks are a universal nest brick for small bird species and should be installed in new developments including masonry extensions, in accordance with best practice guidance such as BS 42021 or CIEEM.

In more detail for supporting evidence, there is no reference to biodiversity in the Neighbourhood Plan or Design Code, except with regard to SuDS. However the RSPB Swift Mapper website shows that there are significant recorded nest sites for swifts, which are a red-listed endangered bird species, in buildings within the neighbourhood boundary on Denholme Road and Shirland Road, and adjacent to the boundary on Marylands Road. There are further sightings within the boundary suggesting that there are also unrecorded nest sites.

Swift bricks are the only type of bird box specifically mentioned as valuable to wildlife in national planning guidance (NPPG Natural Environment 2019 paragraph 023).

Swift bricks are also supported by London Plan 2021 Policy G6 (item B4).

The National Model Design Code Part 2 Guidance Notes (2021) recommends bird bricks (Integrating Habitats section on page 25, and Creating Habitats section on page 26).

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 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.nhbc.co.uk/binaries/content/assets/nhbc/foundation/biodiversity-in-new-housing-developments.pdf>).

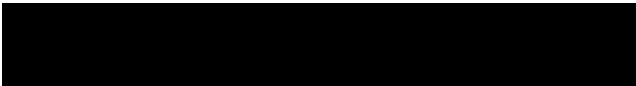
Swift bricks may use a matching brick slip frontage so will blend perfectly with the host building.

Any questions at all please let me know.

Many thanks.

Best regards,
Mr Mike Priaulx

Co-founder of Brent & Westminster Swifts Group



Facebook: <https://www.facebook.com/groups/brentandwestminsterswifts>