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COMPLETE

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Q1

Title Mr/Mrs/Miss/Ms/Dr/Other(please state)*

Mrs

Q2

First Name*

Camilla

Q3

Surname*

Barlow

Q4

Organisation*(If responding on behalf of an organisation)

Wiltshire Swifts

Q5

Email address *

[REDACTED]

Q6

Postal address*

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Q7

Insert any general comments that do not relate to a specific paragraph number or policy in the general comments box below.*If you are suggesting a change is needed to the draft Local Plan or supporting document, it would be helpful if you could include suggested revised wording. If you are commenting on a document supporting the draft Local Plan (such as a topic paper, or the Sustainability Appraisal), please indicate so.

Ensure that the Built Environment is recognised, separately from the Green and Blue Environments, as being a 'habitat' in its own right for building dependent species, as well as those species who are able to adapt to the Built Environment.

It is well documented that closeness to nature is good for well-being and so all new development (houses, public buildings, industrial units, home extensions etc.) should provide nesting cavities for building dependent species. Universal bricks, based on the design of a swift brick, are used by 4 red listed species (swift, house sparrow, starling and house martin), as well as much-loved blue tits and great tits and overwintering birds and insects. They are an invaluable boost to biodiversity in a built environment.

BS 42021: 2022 provides full detail and should be referenced in the Local Plan (<https://knowledge.bsigroup.com/products/integral-nest-boxes-selection-and-installation-for-new-developments-specification-1?version=standard>). BS42021 has been endorsed by the NHBC in NF89 Biodiversity in new housing developments <https://www.nhbc.co.uk/binaries/content/assets/nhbc/foundation/biodiversity-in-new-housing-developments.pdf> page 42. "Fitting at a ratio of 1 nest brick per house across the development will ensure sufficient nest sites for colonial species. 3-5 can be located in one house, so helping locate them in suitable locations for access to foraging habitat. The British Standard BS42021 sets out details on nest box installation for the above species into domestic and commercial properties."

Q8

Insert any specific comments in the general comments box below, indicating which paragraph, policy or matter your comments relate to where possible.*If you are suggesting a change is needed to the draft Local Plan or supporting document, it would be helpful if you could include suggested revised wording.

P25 2.57 Should also reference the NMDC Part 2 Guidance (<https://www.gov.uk/government/publications/national-model-design-code>) as this document provides the much needed detail....Suggested wording: "The National Design Guide, National Model Design Code including Part 2 Guidance, and recent reports of the Building Better...."

P131 Policy CL1 e) requires additional wording because the DEFRA BNG metric does not include ecological enhancements such as bird, bat, bee bricks etc. Therefore it needs to be made clear that net gain in biodiversity also includes additional measures alongside the metric calculation.

P175 5.228 States: "could include things like bird and bat boxes, hedgehog highways, and nature friendly planting for example." The use of the word "could" is too weak, especially as these ecological enhancements are not included in the DEFRA metric (see comment above). Suggested wording: "All development proposals must seek to include proportionate measures to conserve and enhance biodiversity. In addition to meeting the DEFRA metric, all development will be expected to include additional ecological enhancements such as integrated bird bricks/boxes, bat bricks/boxes, bee bricks, hedgehog highways, reptile refugia/hibernacula and nature friendly planting." Many local plans are also including a requirement to meet BS42021: 2022 as this standard provides full detail for universal integrated bird bricks (<https://knowledge.bsigroup.com/products/integral-nest-boxes-selection-and-installation-for-new-developments-specification-1?version=standard>). Universal bricks are based on the design of a swift brick and are used by 4 red listed species (swift, house sparrow, starling and house martin), as well as much-loved blue tits and great tits and overwintering birds and insects. They are an invaluable boost to biodiversity in a built environment. BS42021: 2022 has been endorsed by the NHBC in NF89 Biodiversity in new housing developments <https://www.nhbc.co.uk/binaries/content/assets/nhbc/foundation/biodiversity-in-new-housing-developments.pdf> page 42. "Fitting at a ratio of 1 nest brick per house across the development will ensure sufficient nest sites for colonial species. 3-5 can be located in one house, so helping locate them in suitable locations for access to foraging habitat. The British Standard BS42021 sets out details on nest box installation for the above species into domestic and commercial properties."

P181 BNG The Local Plan should be more ambitious than aiming for a BNG of 10%. Many Local Authorities are aiming for between 15-30%. Given Local Plans stand for many years they must be future-proofed and 10% net gain is too low a starting point.

P193 5.314 The wording needs to include the 'built environment' alongside green & blue infrastructure. Suggested wording : "The design of new development will need to maintain and enhance nature and biodiversity, deliver enhancements to green and blue infrastructure and the built environment, including hedgerows, trees and waterbodies (particularly where these features offer a valuable habitat).
