

**R0226**

Chapter and policy number	Comment	Do you consider the Local Plan to be Legally Compliant? (yes/no)	Do you consider the Local Plan to be Sound? (yes/no)	Complies with Duty to Cooperate (yes/no)
Chapter 12 Open spaces and Green infrastructure, Policy OS3	<p>The text in OS3:</p> <p>"12.4.5 The City's wildlife depends not only on greenery but also on the built environment. Buildings can provide roosting sites for bats and nesting opportunities for birds. Artificial features such as nest boxes should be integrated into the design of development or refurbishment schemes wherever suitable to provide additional habitat for the City's target species... These should be provided in suitable locations, in close proximity to green features, and should include but are not limited to bird boxes, bat boxes and wild bee nesting habitat (cavity and ground nesting)"</p> <p>is generally well-worded but it is not sound as it is not effective nor compliant with national policy, as swift bricks are a universal nest brick for small bird species and are the only type of nest box referenced in national planning guidance (NPPG 2019 Natural Environment paragraph 023), and also London Plan G6 B4 specifically refers to artificial nest sites appropriate for the urban environment, i.e. swift bricks."</p> <p>"The reference in OS3 (5) Biodiversity to "Wildlife-friendly features, such as nesting or roosting boxes..." is welcome but it's not sound as not effective nor compliant with national policy as swift bricks, a universal nest brick for small bird species, are the only type of nest box referenced in national planning guidance (NPPG 2019 Natural Environment paragraph 023), and also London Plan G6 B4 specifically refers to artificial nest sites appropriate for the urban environment, i.e. swift bricks."</p>	Yes	No	Yes

	Please amend "nesting and roosting boxes" to "swift bricks and integrated bat boxes" to match national and local planning guidance. Adding clarification that "swift bricks are a universal nest brick for small bird species" would be helpful.			
Chapter 12 Open spaces and Green infrastructure, Policy OS4	Please amend "nesting and roosting boxes" to "swift bricks and integrated bat boxes" to match national and local planning guidance. Adding clarification that "swift bricks are a universal nest brick for small bird species" would be helpful.	Yes	No	Yes