

View results

Respondent
70 Anonymous

06:10
Time to complete

Part A - Personal Details

We will not be able to accept responses where personal details are not provided.

1. Are you submitting this representation as an individual or on behalf of an organisation? *

- Individual
- Organisation

2. Title

3. First Name *

4. Last Name *

5. Job Title (where relevant)

6. Organisation (where relevant)

7. Address Line 1

56 Myddleton Avenue

8. Address Line 2

London

9. Address Line 3

10. Address Line 4

11. Post Code

[Redacted]

12. Telephone Number

[Redacted]

13. Email Address *

[Redacted]

Part B - Your Representation(s)

To which part of the Local Plan does this representation relate? (Please make one representation at a time, you can click to make a further representation - up to a maximum of 10 per form - at the end of this section).

14. To which policy does your representation relate? *

- Strategic Policy 01: High Quality Growth
- Policy GR1: Achieving a High Standard of Development
- Policy GR2: Inclusive Neighbourhoods
- Policy GR3: Public Realm and Connecting Places
- Policy GR3A: Inclusive Design (New)
- Policy GR3B: Safety, Security and Resilience to Hazards (New)
- Policy GR4: Building Heights
- Policy GR4A: Basement Development (New)
- Policy GR5: View Management
- Policy GR6: Areas of Special Character
- Policy GR7: External Lighting
- Policy GR8: Shopfronts & Forecourts
- Policy GR9: Outdoor Advertisements, digital displays and hoardings
- Policy GR10: Infill and backland sites, back gardens and amenity areas
- Policy GR11: Planning Obligations
- Policy GR12: Site Allocations (New)
- Strategic Policy 02: Harrow's Historic Environment
- Policy HE1: Historic Environment
- Policy HE2: Enabling Development
- Strategic Policy 03: Meeting Harrow's Housing Needs
- Policy HO1: Dwelling size mix
- Policy HO2: Conversion and redevelopment of dwellings
- Policy HO3: Optimising the use of small housing sites
- Policy HO4: Genuinely Affordable Housing
- Policy HO5: Housing estate renewal and regeneration
- Policy HO6: Accommodation for older people
- Policy HO7: Supported and Sheltered Housing
- Policy HO8: Purpose-built student accommodation
- Policy HO9: Large scale purpose built and conversions for shared living
- Policy HO10: Housing with shared facilities (Houses in Multiple Occupation)

- Policy HO11: Self-build and Custom build housing
- Policy HO12: Gypsy and Traveller Accommodation Needs
- Strategic Policy 04: Local Economy
- Strategic Policy 05: Harrow & Wealdstone Opportunity Area
- Policy LE1: Development Principles & Town Centre Hierarchy
- Policy LE2: Night-time and Evening Economy
- Policy LE3: Industrial Land
- Policy LE4: Culture and Creative Industries
- Policy LE5: Tourism and Visitor Accommodation
- Strategic Policy 06: Social and Community Infrastructure
- Policy CI1: Safeguarding and Securing Social Infrastructure
- Policy CI2: Play and Informal Leisure
- Policy CI3: Sport and Recreation
- Policy CI4: Digital and Communications Infrastructure
- Strategic Policy 07: Green Infrastructure
- Policy GI1: Green Belt and Metropolitan Open Land
- Policy GI2: Open Space
- Policy GI3: Biodiversity
- Policy GI4: Urban Greening, Landscaping and Trees
- Policy GI5: Food Growing
- Strategic Policy 08: Responding to the Climate and Nature Emergency
- Policy CN1: Sustainable Design and Retrofitting
- Policy CN2: Energy Infrastructure
- Policy CN3: Reducing Flood Risk
- Policy CN4: Sustainable Drainage
- Policy CN5: Waterway Management
- Strategic Policy 09: Managing Waster and Supporting the Circular Economy
- Policy CE1: Reducing and Managing Waste
- Policy CE2: Design to support the Circular Economy
- Strategic Policy 10: Movement
- Policy M1: Sustainable Transport

- Policy M2: Parking
- Policy M3: Deliveries, Servicing and Construction
- Other

15. Do you consider this policy sound?

- Yes
- No

16. Please give details of why you consider this policy to be sound or not sound and set out the modification(s) you consider necessary to make the policy sound that you have identified (if any).

Policy G13 Biodiversity paragraph 7.3.9 is welcome but it is not sound because there is insufficient detail about best-practice guidance to be effective, and it is not consistent with national policy, because it does not consider London Plan 2021 G6 B4 which calls for features such as artificial nest sites specifically: "that are of particular relevance and benefit in an urban context [i.e. swift bricks]", NPPG 2019 Natural Environment paragraph 023 which specifically highlights the importance of "swift bricks", nor NPPF December 2024 Paragraph 187 (d) (page 54) which states: "planning policies should... incorporate features which support priority or threatened species such as swifts".

Please add to Policy G13: Swift bricks are a universal nest brick for small bird species and should be installed in all new-build developments including extensions in accordance with best-practice guidance such as BS 42021 or CIEEM.

Also please add: Swift bricks are a significantly better option than external nest boxes as they are a permanent feature of the building with no maintenance requirements, improved thermal regulation, and aesthetic integration with the design.

In more detail, further reasons for these changes are as follows:

Swift bricks are excluded from the DEFRA Biodiversity Net Gain metric so need a separate clear policy.

Swift bricks are universal nest bricks for small bird species, 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>), which are essential to save a variety of endangered red-listed urban building-dependent small bird species such as swifts and house sparrows.

Swift bricks are significantly more beneficial than external bird boxes as they are a permanent feature of the building, have zero maintenance requirements, are aesthetically integrated with the design of the building, and have improved thermal regulation with future climate change in mind.

Therefore, swift bricks should be included in all developments following best-practice guidance (which is available in BS 42021:2022 and from CIEEM (<https://cieem.net/resource/the-swift-a-bird-you-need-to-help/>)).

The UK Green Building Council (UKGBC) is a membership-led industry network and they have produced a document entitled: "The Nature Recovery & Climate Resilience Playbook" (Version 1.0, November 2022) <https://ukgbc.org/resources/the-nature-recovery-and-climate-resilience-playbook/> This document is designed to empower local authorities and planning officers to enhance climate resilience and better protect nature across their local area, and includes a recommendation (page 77) which reflects guidance throughout this document: "Recommendation: Local planning Authorities should introduce standard planning conditions and policies to deliver low cost/no regret biodiversity enhancement measures in new development as appropriate, such as bee bricks, swift boxes [and bricks] and hedgehog highways."

Many other local authorities are including detailed swift brick requirements in their Local Plan, such as the majority of London boroughs in their draft or adopted plans including Tower Hamlets Local Plan Regulation 19 stage (Policy B04 paragraph 18.72, <https://talk.towerhamlets.gov.uk/local-plan>),

which follows the exemplary swift brick guidance implemented by Brighton & Hove since 2020,

and Wiltshire Local Plan Regulation 19 stage, which requires an enhanced number of 2 swift bricks per dwelling (policy 88: Biodiversity in the built environment, page 246 - "As a minimum, the following are required within new proposals: 1. integrate integral bird nest bricks (e.g., swift bricks) at a minimum of two per dwelling;" <https://www.wiltshire.gov.uk/article/8048/Current-consultation-Reg-19>),

so such an enhanced level should be considered. Also othe

17. Would you like to make another representaion?

- Yes
- No