



## **Public Consultation on Main Modifications to the Proposed Submission North London Waste Plan (NLWP)**

### **Representation Form and Guidance Notes**

**Please save and return to [feedback@nlwp.net](mailto:feedback@nlwp.net) by the end of Thursday 10<sup>th</sup> December 2020.**

This form has two parts:

**Part A** – Personal details

**Part B** – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

**Guidance notes** are available at the end of the Representation Form. Please read the advice in the guidance notes on making a representation attached to the consultation before completing this response form.

Please note that any comments you make will be made publically available and attributed to your name. Please see the [Privacy Policy](#) for details of how we use your information. We are required to share your information with the Planning Inspector for the purposes of the Examination.

### **Part A: Personal Details:**

**Name:** Mike Priaulx

**Job Title:** North London Representative

**Organisation:** Swift Conservation

## Part B – Your representations

Please use a separate sheet for each representation

### 1. To which Main Modification does this representation relate?

(one modification reference per form)

**Main Modification reference:** MM95

**Paragraph number:** 9.44.

### 2. Do you consider the proposed Main Modification to be:

**Legally compliant (Y/N):** Y

**Sound (Y/N):** N

### 3. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your comments relate to:

**Positively prepared**

### 4. Please give details of why you consider the proposed Main Modification is not legally compliant or is unsound. Please be as precise as possible.

The references to biodiversity are welcome, but don't reflect several of the relevant local authorities specifically mentioning bird nesting boxes and bat boxes in their new Local Plans, nor the draft London Plan which also mentions artificial nest sites, as well as being referenced in national policy, as follows:

Hackney - Hackney Plan 2033 (Section LP47 Biodiversity, clause D) states: "*All development schemes with an eaves height or roof commencement height of 5m and above are required to provide nesting boxes for swifts, sparrows, starlings, and/ or bats as appropriate to help preserve endangered urban biodiversity in Hackney*"

<https://hackney.gov.uk/lp33>

Islington - the draft Islington Plan 2020-2035 (G4 section 5.27 page 153) states: "*Buildings can provide roosting sites for bats and nesting opportunities for birds... Artificial nest boxes/bricks should be incorporated within developments (refurbishments, extensions and/or new build) to provide nesting and roosting opportunities for birds, including species under threat such as swifts, house martins, swallows and house sparrows, and where appropriate, bats.*"

<https://www.islington.gov.uk/~media/sharepoint-lists/public-records/planningandbuildingcontrol/publicity/publicnotices/20182019/20181119localplanstrategicanddpoliciesdpdreg18nov2018reducedsize1.pdf>

Waltham Forest "SHAPING THE BOROUGH Waltham Forest Local Plan" (LP1) 2020 – 2035, Proposed Submission Document (Regulation 19) October 2020 (Policy 81) states: "*D: Where*

*opportunities arise, development proposals should seek to provide measures to support species and habitats through the use of landscaping on or adjacent to buildings. This may involve the inclusion of living roofs and walls or other measures which provide space for species to nest, roost or hibernate."*

[https://www.walthamforest.gov.uk/sites/default/files/Proposed%20Submission%20Local%20Plan%20-%20LP1%2023Oct20\\_compress2%20%28002%29.pdf](https://www.walthamforest.gov.uk/sites/default/files/Proposed%20Submission%20Local%20Plan%20-%20LP1%2023Oct20_compress2%20%28002%29.pdf)

The new draft London Plan (Chapter 8 Policy G6B) states: "*in developing Development Plan policies, boroughs should... 3) support the protection and conservation of priority species and habitats that sit outside the SINC network... 4)... **[include] features such as artificial nest sites, that are of particular relevance and benefit in an urban context.**"*

[https://www.london.gov.uk/sites/default/files/draft\\_london\\_plan\\_-\\_consolidated\\_changes\\_version\\_-\\_clean\\_july\\_2019.pdf](https://www.london.gov.uk/sites/default/files/draft_london_plan_-_consolidated_changes_version_-_clean_july_2019.pdf)

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

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

**5. Please set out what change(s) you consider necessary to make the proposed Main Modifications legally compliant or sound, having regard to the test you have identified in Q3 above where this relates to soundness. You will need to say why this change will make the proposed Main Modification to the Proposed Submission NLWP legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

To ensure that the Main Modification is sound by being positively prepared in accordance with requirements of the Local Plans of the relevant boroughs, the London Plan, and the national policy guidance NPPG, please add the following line to Paragraph 9.44:

- Artificial nesting and roosting habitats such as Swift bricks and Bat boxes should be included where possible.

**6. Do you require notification of any of the following to your email address stated in Part A:**

**The publication of the inspector's recommendations following the independent examination (Y/N): Y**

**The adoption of the Local Plan (Y/N): Y**