

Dear Enfield Local Plan team,

Please find below my comments regarding the Draft Local Plan, DRAFT STRATEGIC POLICY SP BG3 *"Biodiversity net gain, rewilding and offsetting"*.

Please add to this policy:

- Artificial nest sites that are of particular relevance and benefit in an urban context such as swift bricks should be specified in accordance with best practice. Additionally bat boxes and hedgehog highways should be specified where relevant to provide further benefits for wildlife.

This is because the DEFRA biodiversity net gain metric does not take into account the endangered urban species that use older buildings, and no value is given in the metric for providing nesting and roosting spaces nor travelling routes for these species. Therefore this must be required separately.

Relevant policy has not been taken into account, i.e.

- The London Plan (March 2021) Policy G6 Biodiversity and Access to Nature (page 325) calls for: *"artificial nest sites that are of particular relevance and benefit in an urban context"*.
- The National Planning Policy Guidance: Natural Environment (July 2019) Paragraph 023 states that: *"relatively small features can often achieve important benefits for wildlife, such as incorporating 'swift bricks' and bat boxes in developments and providing safe routes for hedgehogs"*.

Integrated measures for wildlife are particularly important for their long lifetime without maintenance being required.

A local example of why this amendment is needed is Shepcot House on New Avenue Estate, N14 4NS, within the borough of Enfield. This building is being demolished and currently hosts at least 27 pairs of swifts, an amber-listed species and possibly the largest colony in north London - however, under the DEFRA biodiversity net gain calculation this site has zero value because buildings have zero value.

The developer Countryside Properties has voluntarily included sufficient swift bricks in the new development to replace the existing colony following lobbying from the Swifts Local Network, but despite their obvious benefits here these swift bricks add zero to their net gain calculation under the DEFRA methodology. (There is qualitative support for swift bricks in the NPPG as outlined above.)

I believe that the retention of populations of such urban species should not be left solely to the good nature of developers.

For information purposes, I have been an unpaid independent consultant on the above project for over two years.

Many thanks for providing an opportunity to comment.