

Dear Enfield Local Plan team,

Following my separate comments with regard to DRAFT STRATEGIC POLICY SP BG3, please find below further comment with regard to DRAFT POLICY DM H4 Small sites and small housing development.

- Please add "*nesting bricks or*" to paragraph 8.4.8. sentence 3, i.e. [addition in bold underlined text]
- *8.4.8 Where small housing development is proposed it should not have an unacceptable adverse impact on biodiversity and green infrastructure. Applications will be expected to identify potential impacts in this regard, and clearly set out measures to minimise and mitigate these. Measures may include the return of hard standing to green space, installation of green and brown roofs and green walls, tree planting, the creation of habitats that encourage biodiversity (for instance bird **nesting bricks or** boxes) and sustainable landscaping. In exceptional circumstances, where site constraints demonstrably preclude the implementation of on-site measures, then off-site provision (for example, tree planting) may be acceptable in order to ensure policy compliance. Off-site provision will be secured on a case-by-case basis through the use legal agreements and/or planning contributions.*

The reason is that the reference to bird boxes is welcome, but this may lead to externally mounted bird boxes which typically have a short lifetime and high maintenance requirements, rather than long lifetime, low maintenance integrated nesting bricks.

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

- The National Model Design Code: part 2 - guidance notes (20/07/21) state:
- "*Biodiversity can be enhanced through facilitating habitats and routes for wildlife, for example, (LNRS) to map and identify opportunities incorporating trees, wildflowers, to create and enhance local biodiversity will ponds, bat and bird boxes, bee and **bird bricks** and hedgehog highways*"
- (section 25 Integrating Habitats, page 25), and
- "*Strategies need to be considered for creating natural habitats, for example, through use of trees, wildflowers and ponds as well as bat and bird boxes, bee and **bird bricks** and hedgehog highways*" (section 26 Creating habitats, page 26).

<https://www.gov.uk/government/publications/national-model-design-code>

- 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*".

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

References to other measures for biodiversity as mentioned in the policy guidance would also be welcome - I have requested that these are included in section DRAFT STRATEGIC POLICY SP BG3.

Many thanks for providing an opportunity to comment.

London Representative,
Swifts Local Network: Swifts & Planning Group.