



Odiham and North Warnborough Neighbourhood Plan 2014-2032

Representation Form

Copies of the Odiham and North Warnborough Neighbourhood Plan and supporting documents are available on [Hart District Council's website](#). Paper copies are available at the locations listed on the website.

Comments must be received by 4pm Monday 16 September

You can send your comments by:

- filling in this form and emailing it [REDACTED]
- printing this form and posting it to us at:

Planning Policy Team
Hart District Council,
Harlington Way
Fleet,
Hampshire, GU51 4AE

We cannot accept anonymous comments and will publish all comments on our website with your name and organisation (where applicable). If Odiham Parish Council, who prepared the plan, request a copy, we will send a redacted version showing only your name and comments.

We will send the neighbourhood plan examiner a full copy of your comments and details. The examiner will retain the data until we have made the relevant statutory decisions on whether to adopt the plan and the deadline for a Judicial Review has passed, which is six weeks after the decision notice has been published.


For further details on: how your information is used; how we maintain the security of your information; your rights, including how to access information we hold on you; and how to complain if you have concerns about how your personal details are processed, please see [Hart's Privacy Notice](#).

If you would like to be notified of Hart District Council's decision whether to 'make' the Plan (to bring it into legal force), please mark the box below.

Yes, please notify me yes

If you would like to opt out of this decision at any time, please email [REDACTED]

PART A: Details of the individual or organisation making the representation

	Your details	Agents details (if applicable)
Full name	Michael Priaulx	
Address	56 Myddleton Avenue, London	
Postcode	N4 2FG	
Email		
Organisation (if applicable)	Swifts Local Network: Swifts & Planning Group	

PART B: Your representation

To which part of the Neighbourhood Plan does your representation relate?

Whole document? no

Paragraph number: 3.118

Policy reference: 12 (vi)

Do you support, oppose, or wish to comment on this policy/paragraph?

(Please tick one answer)

Support Support with modifications yes Oppose Have Comments

Please give details of your reasons for support/objection, or make other comments in the space below, including any specific changes you wish to see to the Plan. Please be as precise as possible and use a new form for comments on different policies/parts of the Plan. Please do not include any personal information in your answer below.

Representation:

I support the references to "*nest boxes*", but the plan does not consider building-dependent biodiversity, e.g. bird species such as swifts, house sparrows, and house martins. Building-dependent biodiversity is also excluded by the DEFRA biodiversity net gain metric calculation so needs a separate policy.

Therefore, please add to the policy: Swift bricks are a universal nest brick for small bird species, and should be installed in new developments including extensions, in accordance with best practice guidance such as BS 42021 or CIEEM. Artificial nest cups for house martins may be proposed instead of swift bricks where recommended by an ecologist.

Please add: Existing nest sites for building-dependent species such as swifts and house martins should be protected, as these endangered red-listed species which are present but declining in the district return annually to traditional nest sites. Mitigation should be provided if these nest sites cannot be protected.

In more detail, the reason for this is that nest sites in buildings and bird boxes/ bricks and other species features are excluded from the DEFRA Biodiversity Net Gain metric, so require their own clear policy.

The Government's response in March 2023 to the 2022 BNG consultation stated that: "We plan to keep species features, like bat and bird boxes, outside the scope of the biodiversity metric... [and] allow local planning authorities to consider what conditions in relation to those features may be appropriate" (page 27, https://consult.defra.gov.uk/defra-net-gain-consultation-team/technicalconsultation_biodiversitymetric/).

Swift bricks are the only type of bird box specifically mentioned as valuable to wildlife in national planning guidance, along with bat boxes and hedgehog highways (NPPG

Natural Environment 2019 paragraph 023). The National Model Design Code Part 2 Guidance Notes (2021) also recommends bird bricks (Integrating Habitats section on page 25, and Creating Habitats section on page 26).

Swift bricks are considered a universal nest brick suitable for a wide range of small bird species including swifts, house sparrows and starlings (e.g. see NHBC Foundation: Biodiversity in New Housing Developments (April 2021) Section 8.1 Nest sites for birds, page 42: https://www.nhbcfoundation.org/wp-content/uploads/2021/05/S067-NF89-Biodiversity-in-new-housing-developments_FINAL.pdf).

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 better 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 local authorities are including detailed swift brick requirements in their plans, such as Tower Hamlets Local Plan Regulation 18 stage (paragraph 19.70, page 311 - <https://talk.towerhamlets.gov.uk/17424/widgets/82097/documents/50138>),

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>),

and Cotswold District Council are proposing three swift bricks per dwelling in their current Local Plan consultation (Policy EN8 item 6, and paragraph 0.8.4, <https://www.cotswold.gov.uk/planning-and-building/planning-policy/local-plan-update-and-supporting-information/>),

so such an enhanced level should also be considered.