5714   Comment

Document Element: Policy NB2: Biodiversity
Respondent: RSPB (Royal Society for the Protection of Birds)
Date received: 23/05/2024 via Web

Summary:

The RSPB urges South Staffordshire Council to make provision of universal nest bricks for birds explicit through a development condition in Policy NB2. Further detail and justification provided within comment. The RSPB also suggest that a Supplementary Planning Document is produced to complement this Policy, which will provide detailed guidance on how to incorporate nesting opportunities for Swifts and other Red-Listed bird species within development proposals. The RSPB also suggests a separate policy provision for roosting bats within NB2.

Full text:

With reference to Policy NB2 'Biodiversity', the RSPB note and support the condition that new development must include "site-specific enhancements for species such as bat and bird boxes…"

However, the RSPB urges South Staffordshire Council to go a step further and make this provision for birds explicit through a development condition in Policy NB2. Doing so would demonstrate a clear commitment to biodiversity in South Staffordshire by supporting Swifts, House Martins, House Sparrows and Starlings - all Red-Listed Birds of Conservation Concern that are associated with urban habitats.

This could be included through an additional section at the end of Policy NB2, referring to 'Local opportunities for habitats and wildlife' within which provision of integral 'universal nest bricks' is included as a development condition. This approach has been taken by Sandwell in their Draft Local Plan and so this presents an opportunity for South Staffordshire Council to enable collaborative, large-scale provision for threatened wildlife across the West Midlands. Furthermore, 'universal nest bricks' are cheap, easy to install, designed for Swifts but benefit multiple species with one design.

Suggested wording for the policy is set out below, which follows established precedent from other Local Plans, including Brighton and Hove City Plan:
"All development proposals with an eaves height or roof commencement height of 5m and above are required to provide integrated universal nest bricks for Swifts that will also support nesting House Martins, House Sparrows and Starlings. These measures will help preserve endangered species and support urban biodiversity in South Staffordshire."

The RSPB also suggest that a Supplementary Planning Document is produced to complement this Policy, which will provide detailed guidance on how to incorporate nesting opportunities for Swifts and other Red-Listed bird species within development proposals. This has also been done by other Councils including Brighton and Hove City Council.

For further information on Swifts and how to support them, we refer to the Bulletin of the Chartered Institute of Ecology and Environmental Management (CIEEM), Issue 104 (June 2019): "The Swift - A Bird You Need to Help" https://cieem.net/resource/the-swift-a-bird-you-need-to-help/.

For more detail on universal nest bricks, we refer to the CIEEM article "Swift Bricks: The 'Universal' Nest Brick" – by Dick Newell (July 2021) https://cieem.net/swift-bricks-the-universal-nest-brick-by-dick-newell/

The RSPB would very much welcome the opportunity to work with South Staffordshire Council on developing this Policy and Supplementary Planning Document, as it presents a brilliant opportunity to improve the fortunes of Swifts and other birds, which are in urgent need of help.

The RSPB also welcome reference to bats, although we suggest that provision for bats is also included as a separate item within Policy NB2 as they have specific requirements which differ from the provision for birds. There is some good guidance available from the Bat Conservation Trust on how to provide bat roost opportunities which could inform this item: https://www.bats.org.uk/our-work/buildings-planning-and-development/bat-boxes.

Change suggested by respondent:

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Legally compliant: Not specified
Sound: Not specified
Comply with duty: Not specified
Attachments: None