

My comments on the Draft London Plan:

These are Regarding Policy G6 Biodiversity and Access to Nature (Chapter 8 Green Infrastructure and Natural Environment).

1. I note that this section of the Draft Plan focuses on green space. This only partially addresses the protection, conservation and enhancement of wildlife and biodiversity in London and is therefore inadequate.
2. A very important wildlife habitat is also the built (i.e. man-made) environment. The Plan should also include a section dealing with buildings as wildlife habitat.
3. There are many species that are dependent on our buildings and structures for shelter, breeding and lifestyle. The new Plan needs specifically to make it a statutory obligation to (a) conserve and (b) help the recovery of these species.
4. I write primarily as an RSPB Swift volunteer. The Common Swift (*Apus apus*) is now Amber-listed as a Bird of Conservation Concern (ref: *BoCC4 (Red List) Dec 2015*).
5. In common with the general swift population in England, the Swift population in London has declined dramatically and increasingly sharply. The 2016 Breeding Bird Survey trend figures show a -54% decline between 1995 & 2016 for Swift in London, with the majority of the decline having taken place in only the last 15 years. There was a -4% decline in the year 2015-16 alone. This level of decline is unsustainable. (ref: [bto-jncc-rspb_breeding_bird_survey_trends_2016_-_london](#)).

Swift population trend graphs can be found on the British Trust for ornithology's website:
<https://www.bto.org/volunteer-surveys/bbs/latest-results/trend-graphs>

I attach two screen shots of each of the relevant table/graph for quick reference.

6. The Swift is **entirely** dependent on buildings for its survival. It breeds **exclusively** in buildings, under the eaves or in crannies high up in buildings. Swifts are the most site-faithful nesters of any bird species in the UK, meaning that swift nest sites will be used continuously during the breeding season for generation after generation. Swift are long-lived birds and are of breeding maturity only at 4 years old.

Nearly all of London's remaining swift nest in cavities in older buildings. New building methods and materials exclude all wildlife. Swifts displaced from their nest sites through demolition or renovation will not find new nest sites in 21st-century buildings, or any that have been reproofed and had roof repairs.

Once a nest site is lost, it is lost for good. The bird will not breed that year when it returns from migration and will in all likelihood not find anywhere else near its colony to breed. Owing to the scale and rapidity of change in our housing stock, some of our swift colonies in London are now tiny, consisting of just a few birds; sometimes only a single pair will remain .

7. A requirement should be included in the London Plan for swift nesting bricks and nesting spaces to be built into the fabric of new builds, both housing and in public and commercial buildings. Exeter City Council has such an award-winning policy and can be taken as a good example. The RSPB and the specialist organisation Swift Conservation can advise readily on provision for the inclusion of swift habitat and swift species recovery into the Plan.

8. A very wide range of swift nesting bricks and next boxes are now available commercially and including the right number in a development is minimal in cost and effort when planned in at the construction stage.

9. As one of the acute Species of Concervation Concern, strategies to help the recovery of London's swift population should specifically be included in the new London Plan. Swifts should be included alongside bats, sparrows and other species. i note that

10. Councils have a legal obligation under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 to protect and enhance all biodiversity. If no nest provision is made for swifts in the new London Plan, the GLA and the Mayor of London will be failing in their duty under the Act.

Thank you for taking these comments into consideration.

With kind regards,

Catherine Day