

#175

COMPLETE

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Page 1

Q1

Title Mr/Mrs/Miss/Ms/Dr/Other(please state)\*

Professor

Q2

First Name\*

Catharine

Q3

Surname\*

Gale

Q4

Organisation\*(If responding on behalf of an organisation)

Hampshire Swifts

Q5

Email address \*

[REDACTED]

Q6

Postal address\*

[REDACTED]

Q7

Respondent skipped this question

Insert any general comments that do not relate to a specific paragraph number or policy in the general comments box below.\*If you are suggesting a change is needed to the draft Local Plan or supporting document, it would be helpful if you could include suggested revised wording. If you are commenting on a document supporting the draft Local Plan (such as a topic paper, or the Sustainability Appraisal), please indicate so.

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Q8

Insert any specific comments in the general comments box below, indicating which paragraph, policy or matter your comments relate to where possible.\*If you are suggesting a change is needed to the draft Local Plan or supporting document, it would be helpful if you could include suggested revised wording.

For Ecology & Biodiversity section, paragraph 5.228 (page 175):

The reference to "bird boxes" in paragraph 5.228 is welcome, but the Local Plan currently overlooks biodiversity which inhabits buildings, e.g. red-listed endangered bird species such as swifts, house sparrows, and house martins, which are also overlooked by the DEFRA biodiversity net gain metric calculation so do need their own clear policy. This is supported by national planning guidance NPPG Natural Environment 2019 paragraph 023, which in particular mentions the value of swift bricks.

Please add to the Ecology & Biodiversity section, and also policy DES2:

Swift bricks are a universal nest brick for small bird species, and should be installed in all new-build developments including extensions, in accordance with best-practice guidance such as BS 42021:2022 or CIEEM. Swift bricks are a significantly better option than external boxes due to their long lifetime, no maintenance requirements, improved thermal regulation, and aesthetic integration. Artificial nest cups for house martins may be proposed instead of swift bricks where an ecologist specifically recommends it.

Please also add to the Ecology & Biodiversity section:

Existing nest sites should also be protected and retained, as these are not given any value by the DEFRA biodiversity net gain metric calculation. Building-dependent species return to traditional nest sites year after year, and find it difficult to locate a new site if they lose it.

The reasons for also including in policy DES2: Design Details and Considerations, are because this is in accordance with the National Design Code guidance which recommends bird bricks, and to ensure that swift bricks are included at an early design stage for effective integration into the building design and reliable installation on site.

Swifts are an important species in Hampshire with a substantial number of older buildings and suitable areas for foraging. RSPB Swift Mapper website (<https://www.swiftmapper.org.uk/>) and Hampshire Swift Survey (<https://www.hampshireswifts.co.uk/copy-of-hampshire-swift-survey>) demonstrate that they are recorded nesting throughout the county. Other bird species which will inhabit swift bricks are also present, such as house sparrows.

Other local authorities are bringing through Local Plan policies which support swift bricks, such as Wiltshire Regulation 19 stage which requires two swift bricks per dwelling (policy 88 on page 246: <https://www.wiltshire.gov.uk/article/8048/Current-consultation-Reg-19> ).

I am writing on behalf of Hampshire Swifts, for whom I am a Trustee (<https://www.hampshireswifts.co.uk/> ). This charity was formed in 2016 in response to the ongoing decline of swifts in the county. Our activities include raising awareness of the declining status of swifts, identifying and protecting existing nest sites, encouraging the provision of additional nest sites across the county, particularly permanent sites in the form of swift bricks in new developments. We have over 3000 members/subscribers.

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