

#322

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Q1

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

Mr

Q2

First Name\*

Michael

Q3

Surname\*

Priaulx

Q4

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

Swifts Local Network: Swifts & Planning Group

Q5

Email address \*

[REDACTED]

Q6

Postal address\*

N/A

**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), and also policy DES2:

The reference to "bird boxes" in paragraph 5.228 is welcome, but currently insufficient to meet national policy and design code guidance and enable suitable provision for target species.

In summary, please add to the Ecology & Biodiversity section and also to policy DES2:

Swift bricks should be installed in all new-build developments including extensions, in accordance with best-practice guidance such as BS 42021 or CIEEM which require at least one swift brick per home on average for each development.

Artificial nest cups for house martins may be proposed instead of swift bricks where recommended by an ecologist.

Also, 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 Test Valley borough return annually to traditional nest sites.

Mitigation should be provided if these nest sites cannot be protected.

In more detail, the reasons for this are:

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

National planning guidance NPPG 2019 Natural Environment paragraph 023 highlights the value of swift bricks - swift bricks are a universal nest brick for small bird species (NHBC Foundation: Biodiversity in New Housing Developments (April 2021) Section 8.1: [https://www.nhbcfoundation.org/wp-content/uploads/2021/05/S067-NF89-Biodiversity-in-new-housing-developments\\_FINAL.pdf](https://www.nhbcfoundation.org/wp-content/uploads/2021/05/S067-NF89-Biodiversity-in-new-housing-developments_FINAL.pdf) ).

This addition will enable the implementation of a policy recommending swift bricks, by ensuring the early inclusion of swift bricks on the drawings for an integrated design process and reliable installation on site.

House martins are an important species in the borough, and artificial nest cups are also included in BS 42021:2022.

Building-dependent birds, and swift bricks and other species features, are excluded from the DEFRA Biodiversity Net Gain metric, so require their own 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/](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](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 improved 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 other Local Authorities are including detailed swift brick requirements in their Local Plan, 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.

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