
From: Stephen Fitt
Sent: 28 June 2021 16:42
To: Planning Policy
Cc: Angela King
Subject: Re: Dalwood Neighbourhood Plan - Regulation 16 Consultation
Attachments: The case for universal bricks 150920_update v6 CB.docx

Thank you for inviting the RSPB to comment on the above.

We fully support Policy NE1 with particular reference to the conservation of wildlife in general and specially protected species in particular, we would however like to comment on the policies or lack of them relating the Protection and Enhancement of Biodiversity where it relates to new building, significant repairs or extensions of residential and commercial/agricultural buildings.

Many species of vertebrates of birds, bats and invertebrates have occupied the nooks and crannies of village properties for as long as they have been there, today the way we build and maintain them prevents this happening !!

This is one of the causes why even common species such as house sparrows and starlings are on the BTO's red list of birds of conservation concern, there are simple remedies.

This

<https://www.nhbcfoundation.org/publication/biodiversity-in-new-housing-developments-creating-wildlife-friendly-communities/>

recent addition to the National House Builders Library of Guides sets out protocols of "Best Practice" for major developments, most of the steps advocated are equally relevant to smaller scale projects likely to be involved under your proposed Policy BHE1.

To make certain that these are included they need to be made a condition of Planning Consents, details included on the working drawings and only "signed off" when photographic evidence has been provided that they have been installed correctly.

This should apply to all "new builds" including commercial/agricultural buildings and renovations/extensions where planning permission is required.

In practice we have found that including a minimum of one integral **Bird Box** per dwelling, designed for swifts will be used by most building dependant species, see attached, will be occupied during the lifetime of the building.

The mass and construction details of non-residential buildings should be considered on a case by case basis when deciding on the numbers that would be required !!

The Bat Conservation Trust - <https://www.bats.org.uk/> is currently researching the efficacy of installing **Bat Tubes** and it would be best to seek their advice when this work has been completed.



Home - Bat Conservation Trust - bats.org.uk

The Bat Conservation Trust was formed in 1990 as an umbrella organisation for the rapidly growing network of bat groups, providing support, training and advice.

www.bats.org.uk

"Bee Bricks" for solitary bee species are a simple and useful addition, more information from "Bug Life"

<https://www.buglife.org.uk/resources/policy-and-legislation-hub/>



Policy and Legislation Hub | Buglife

Biodiversity Offsetting . Throughout the UK, wildlife loses out to new development. The recent 'State of Nature' report indicated that 60% of all species are in decline and this can partly be attributed to the loss of semi natural habitats to make way for new development.

www.buglife.org.uk

Hedgehog numbers are also a cause for concern and even where there are viable populations their conservation should be prioritised see <https://www.hedgehogstreet.org/help-hedgehogs/> for advice on creating hedgehog friendly gardens.

A British Standard for integral bird boxes should be available shortly and we can supply case notes and monitoring results from work that we have done in the Region if required.

Best wishes,

Stephen Fitt

RSPB South West Regional Office, Exeter.



Swift Bricks – the ‘universal’ nest brick

The purpose of this document is to:

- outline emerging evidence that swift bricks are significantly more effective for sparrows than sparrow bricks and terraces, whilst also providing nesting opportunities for swifts and a range of other small birds;
- propose that swift bricks are specified as 'universal' nesting bricks for small bird species;
- highlight the significant advantages of integrated nesting bricks over external nest boxes;
- provide examples of good practice for the level of nest brick provision in new developments.

The article *'The Swift – A Bird You Need to Help!'* in issue 104 June 2019 of CIEEM bulletin *'In Practice'* (<https://cieem.net/resource/the-swift-a-bird-you-need-to-help/>) highlights the plight of the swift and provides practical solutions to help save this amazing bird, at the same time as benefiting other small endangered bird species.



Photos courtesy of Hugh Hastings and the Duchy of Cornwall

House sparrows happily nesting in swift bricks

The Government has recognised and supports the need to build more houses but with due regard for biodiversity¹, and swift bricks are specifically highlighted in national planning guidance as providing important benefits to wildlife².

The current consultation regarding the planning process in England refers frequently to advice from the Building Better Building Beautiful Commission's report *'Living With Beauty'*³ which recommends: *'Bricks for bees and birds in new build homes'*.

With funding stretched for Local Authorities (LAs), the reports provided by ecologists have an important role in the ecological mitigation and enhancement conditions set by LAs for developers. This knowledge can be enhanced by using the more specialist expertise of the many voluntary nature groups we are lucky enough to have in the UK.

Swifts, for example, only visit the UK for the summer months and are therefore often not present when an ecological survey is undertaken. Even if the survey is undertaken in the brief period they are here, they are elusive birds who enter and leave their nesting sites, in the nooks and crannies of buildings, in the blink of an eye and so nesting sites are very easy to overlook.

Swift conservation groups have been observing for some time now that house sparrows often nest in integral swift bricks. In fact, they appear to prefer them to the frequently specified sparrow terraces.

¹ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

² <https://www.gov.uk/guidance/natural-environment>

³ <https://www.gov.uk/government/publications/living-with-beauty-report-of-the-building-better-building-beautiful-commission>

Studies are now showing that these observations are representative and that swift bricks are also occupied by other small bird species, and so provide a successful practical biodiversity enhancement in line with government planning policy.

The case for integral swift bricks as a 'universal' brick

- The house sparrow is a red-listed species which results in sparrow bricks and terraces being a popular choice of nesting provision. Installing integral 'universal' swift bricks instead not only increases the chance of them being used very quickly, but also increases the number of species being given a helping hand.
- Sparrows, like swifts, are colonial birds. Observation of their nesting habits has shown that not only do they prefer swift bricks, but that very few sparrow terraces are occupied by more than one pair, possibly because the entrance holes are too close together.
- Swifts are unable to use sparrow bricks and terraces.
- Evidence is now emerging from studies being undertaken at various sites across the country showing that swift bricks are being used by a variety of small birds and could be described as a 'universal' brick for small building-dependent species. See link to a recent press release from a Duchy of Cornwall site that is in its second year of collecting data: <https://nansledan.com/nansledan-residents-asked-to-help-with-bird-box-survey/>
- Swifts, house sparrows, house martins, blue tits, great tits, starlings and nuthatches have all been recorded nesting in swift bricks.
- This is particularly good news for the red-listed house sparrow and starling as well as the amber-listed swift, expected to be red-listed at the next review. All three species are undergoing major decline caused by the loss of nesting sites on existing buildings due to re-roofing and replacement of soffits and fascias. Swifts, for example, have experienced a catastrophic decline of nearly 60% in the last 20 years.
- It is also very good news for developers as it means that one brick type will provide a very cost-effective ecological enhancement for a variety of bird species.
- Bricks are very easy to include in routine building practices resulting in an inexpensive biodiversity enhancer with the nesting site confined within the brick with no access to the roof space.

Integral Bricks v External Boxes

- more aesthetically pleasing
- maintenance free
- long lasting
- less prone to predation
- less prone to temperature variations



Photo courtesy of Hugh Hastings and the Duchy of Cornwall



Photo courtesy of Clive Cooper

House martins (L) and swifts (R) nesting in swift bricks



Photos courtesy of Arc Consulting

Photos courtesy of Tanya Hoare

From left to right: a blue tit emerging from a swift brick; a great tit about to enter a swift brick; a Schwegler Type 25 swift brick, its entrance narrowed with mud by a nesting nuthatch; a starling on the entrance hole of a swift brick with a house-sparrow showing a keen interest.

Examples of the level of nesting provision in new developments

A ratio of at least 1:1 nest bricks per dwelling is generally accepted now as good practice – a level of provision outlined in the award-winning Exeter City Council Residential Design Guide SPD (2010). The RSPB South West Regional Office has been working with Exeter Planners over a period of 10 years on the implementation of the biodiversity requirements of this guide and there is acceptance that in many cases the most suitable box type for all cavity nesting birds is the swift brick.

A similar standard was adopted by the Town and Country Planning Association and the Wildlife Trusts in 2012 Planning for a Healthy Environment - Good Practice for Green Infrastructure and Biodiversity⁴ and The Royal Institute of British Architects (RIBA) in 2013⁵.

The Duchy of Cornwall adopted the same principles in 2015, and a good example of the provision of a general type of integral box for all cavity nesting birds is the Nansledan development by The Duchy of Cornwall in Newquay.⁶

The Cornwall Council Biodiversity Guide (2018)⁷ gives prescriptive measures for the provision of bat and bird boxes, again at the rate of 1 nest place per new dwelling. This document also includes a case study on Nansledan mentioned above.

The Oxford City Council Technical Advice Note on Biodiversity⁸ gives an 'expected provision' of bird nest sites for building dependent birds (i.e. swifts) at a rate of 1 per house and 1 per 2 flats, with separate provision for bats at a rate of 1 per 5 houses. Provision of such nest boxes in schools, student accommodation and hotels is addressed by a ratio of 1 per 250 m² floor space.

From 1st June 2020, Brighton & Hove City Council have conditioned a minimum of three swift nest bricks or two per dwelling in all new developments that are five metres high or above, and commercial developments will be required to have a minimum of three boxes, or one per 50sqm of floor space.^{9 10 11}

⁴ https://www.sustainabilitywestmidlands.org.uk/wp-content/uploads/Planning_for_a_healthy_environment_report.pdf

⁵ Gunnell, K., Murphy, B. and Williams, C., Designing for Biodiversity: A technical guide for new and existing buildings, RIBA Publishing & Bat Conservation Trust (2013).

⁶ <https://www.rspb.org.uk/our-work/rspb-news/news/stories/the-duchy-of-cornwall-giving-swifts-a-home/>

⁷ Cornwall Council Biodiversity Guide (2018) available here: <https://www.cornwall.gov.uk/media/38341273/biodiversity-guide.pdf>

⁸ Oxford City Council Technical Advice Note: Biodiversity – Planning Application Guidance available at:

https://www.oxford.gov.uk/info/20067/planning_policy/745/planning_policy-technical_advice_notes_tan

⁹ https://new.brighton-hove.gov.uk/news/2020/council-takes-swift-action-protect-birds?utm_source=hootsuite&utm_medium=twitter

[birds?utm_source=hootsuite&utm_medium=twitter](https://new.brighton-hove.gov.uk/news/2020/council-takes-swift-action-protect-birds?utm_source=hootsuite&utm_medium=twitter)

¹⁰ <https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Swift%20Guidance.pdf>

¹¹ <https://new.brighton-hove.gov.uk/news/2020/helping-swifts-find-safe-haven-brighton-hove>

Appendix

Swift bricks in the national planning context

- **National Planning Policy Framework (NPPF, 2019)**¹² states: *“Planning policies and decisions should contribute to and enhance the natural and local environment by: ...minimising impacts on and providing **net gains in biodiversity**...”* (Section 170d).
- **National Planning Policy Guidance (NPPG, 2019)**¹³ states: *“...relatively small features can often achieve important benefits for wildlife, such as incorporating ‘**swift bricks**’ and bat boxes in developments and providing safe routes for hedgehogs between different areas of habitat”* (Natural Environment, Paragraph 023, Reference ID: 8-023-20190721).
- **Living With Beauty (Government’s Building Better Building Beautiful Commission, 30/01/20)**¹⁴ recommends: *“**Bricks for bees and birds in new build homes**”* (Policy Proposition 33, page 110). **Ministry of Housing, Communities & Local Government press release (21/07/19)**¹⁵ stated: *“For the first time the government has set out its expectations on how developers can protect specific species, including using ‘hedgehog highways’ and hollow **swift bricks** – which are installed into the walls of new build homes, allowing the birds to nest safely. This follows public interest for protecting these much-loved animals, with one petition receiving support from over half a million people.”*
- **Natural Environment and Rural Communities (NERC) Act 2006**¹⁶ states: *“Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, **to the purpose of conserving biodiversity**”* (Section 40).

Useful websites

- **Swift Conservation** - <https://www.swift-conservation.org/>
- **Action for Swifts** - <http://actionforswifts.blogspot.com/>
- **RSPB** - <https://www.rspb.org.uk/birds-and-wildlife/wildlife-guides/bird-a-z/swift/>
- **RSPB Swift Mapper** - <https://www.swiftmapper.org.uk/>
- **Types of integral nestboxes available** - <https://actionforswifts.blogspot.com/p/swift-bricks.html>

This document has been issued on behalf of Swifts Local Network, an informal network of over 90 conservation groups in the UK: <https://actionforswifts.blogspot.com/p/sln.html>.

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¹² <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

¹³ <https://www.gov.uk/guidance/natural-environment>

¹⁴ <https://www.gov.uk/government/publications/living-with-beauty-report-of-the-building-better-building-beautiful-commission>

¹⁵ <https://www.gov.uk/government/news/brokenshire-orders-house-builders-to-protect-wildlife>

¹⁶ https://www.legislation.gov.uk/ukpga/2006/16/pdfs/ukpga_20060016_en.pdf