

From: [Stephen Fitt](#)
To: [Planning Policy](#)
Subject: Re: Kilmington Neighbourhood Plan Submission Consultation
Date: 23 March 2022 12:19:07
Attachments: [image001.jpg](#)
[universal nest brick 0122 \(2\) \(2\) \(2\).pdf](#)

Dear Angela

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

Its a comprehensive document and we have no hesitation in supporting

Para 5 of Policy CGS2

Opportunities to incorporate provision for nesting birds and roosting bats must be considered, and included wherever possible/practical in new developments, to protect and enhance biodiversity. A minimum of one integral bird box designed for swifts shall be incorporated into each new build residential unit, and/or where existing buildings are being altered/extended, an ecologist should be instructed to check for existing nests/ roosts of birds or bats. These should be retained where possible or replaced with an integral box, or if not practical, an external box. Wherever possible and practicable, this minimum requirement should be exceeded through other appropriate measures including, but not limited to, external nest cups for house martins and swallows, and internal oxygen “tubes” for bats, at all times in accordance with current legislation for specially protected species.

which would be enhanced by the inclusion of "Bricks" designed for Solitary Bee species and Hedgehog Highways so they can access neighbouring gardens and adjoining "green spaces" which will also facilitated by putting **Policy TT2** into practice.

We can provide further advice/information on choosing appropriate materials and/or locations if required.

Best wishes

Stephen Fitt

RSPB England, Exeter Office.

PS Am advised that *British Standard (BS 42021:2021Integral nest boxes – Selection and installation for new developments – Specification)* will be published this week so could be referred to in this Document !!

From: Planning Policy

Sent: 09 February 2022 15:18

To: Angela King

Subject: Kilmington Neighbourhood Plan Submission Consultation

Dear All

I am writing to advise that the Kilmington Neighbourhood Plan has been submitted to East Devon District Council, in accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations 2012. The plan has been assessed as compliant with the Regulations and as such the formal consultation is being launched today, and your comments on the Plan are now invited.

Attached to this email you will find the formal Notice containing the full details of the consultation.

The submitted Neighbourhood Plan and supporting documents, as well as a Comments Form, are available to view on our website at: [Neighbourhood Plans being produced in East Devon - Kilmington - East Devon](#).

If you would like to make a representation, please send your comments by email (preferably using the comments form) to: planningpolicy@eastdevon.gov.uk.

The consultation is open for 7 weeks from today, closing **midnight 30th March 2022**.

Please note that comments received after this date cannot be accepted.

My contact details are below if you have any queries or need more information. Please do let me know if you no longer wish to receive these neighbourhood plan notifications, providing an alternative contact where appropriate, so we can ensure our mailing list remains applicable.

Thanks in advance for your time,

Angela

Angela King MRTPI

Neighbourhood Planning Officer

East Devon District Council

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Swifts Local Network

Swift Bricks

the '*universal*' nest brick



Swift Bricks

the 'universal' nest brick

The purpose of this document is to:

- outline emerging evidence that integrated nest boxes, commonly known as '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' nest bricks for small cavity-nesting birds;
- highlight the significant advantages of integrated nest 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 benefitting other small endangered bird species.

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'* which recommends: *'Bricks for bees and birds in new build homes'*³.

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 nest sites, in the nooks and crannies of buildings, in the blink of an eye and so nest sites are very easy to overlook.

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

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 integrated 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 integrated '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. This link is to a press release from a Duchy of Cornwall project that is in its third year of collecting data <https://nansledan.com/duchy-nest-brick-project-boosts-endangered-wild-birds/>
- **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 **swift**, which became red listed in December 2021. 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 nest site confined within the brick with no access to the roof space.



Photos courtesy of Hugh Hastings and the Duchy of Cornwall



House sparrows nesting in swift bricks

Integrated Bricks v External Boxes

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



Photos courtesy of Hugh Hastings and the Duchy of Cornwall, Dick Newell, and Clive Cooper



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

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)⁴. 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 cavity nesting birds is the swift brick.

A similar standard was adopted by the **Town and Country Planning Association** and the **Wildlife Trusts** in 'Planning for a Healthy Environment - Good Practice for Green Infrastructure and Biodiversity' (2012)⁵, and by the **Royal Institute of British Architects** (RIBA) in 'Designing for Biodiversity' (2013)⁶.

The **Duchy of Cornwall** adopted the same principles in 2015, and a good example of the provision of a general type of integrated box for all cavity nesting birds is the Nansledan development by The Duchy of Cornwall in Newquay⁷.

The **Cornwall Council** 'Planning for Biodiversity and Net Gain SPD' (2018)⁸ states that in order to deliver ecological enhancement across Cornwall all new residential developments are also expected to provide either a bat or bird box/tube within the structure of the building at a rate of one box/tube per unit. This document also includes a case study on Nansledan mentioned above.

The **Oxford City Council** 'Technical Advice Note 8 – Biodiversity' (updated April 2021)⁹ states an 'expected provision' of bird nest sites for building-dependent birds (e.g. 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.

Brighton & Hove City Council have conditioned swift nest boxes (to be integrated bricks wherever practical) in all new developments that are five metres high or above; e.g. for smaller developments a minimum of three boxes, or two per residential dwelling, or one per 50sqm of commercial floor space, whichever is the greater.^{10 11 12}



Photos courtesy of Arc Consulting

Photos courtesy of Tanya Hoare

From top: 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** at the entrance hole of a swift brick with a **house sparrow** showing a keen interest.

APPENDIX

Swift bricks in the national planning context

- **National Planning Policy Framework (NPPF, 2019)**¹³ 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, page 49).
- **National Planning Policy Guidance (NPPG, 2019)**¹⁴ 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)**¹⁵ 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)**¹⁶ states: “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**¹⁷ 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).
- **NHBC Foundation: Biodiversity in new housing developments: creating wildlife-friendly communities (April 2021)**¹⁸ states: “Provision of integrated nest sites for swifts is through hollow chambers fitted into the fabric of a building while in construction. Although targeting swifts they will also be used by house sparrows, tits and starlings **so are considered a ‘universal brick’**” (Section 8.1 Nest sites for birds, page 42).
- **CIEM blog: Swift Bricks: The ‘Universal’ Nest Brick (26/07/21)**¹⁹ states: “For the smaller species, a one-size-fits-all policy is not only more effective, it simplifies things for ecologists, planners and builders. **Swift boxes can accommodate house sparrows, starlings, tree sparrows, blue tits, great tits and occasionally house martins**” (Conclusion).
- **Environment Agency, Chief Scientist’s Group: The state of the environment: the urban environment (2021)**²⁰ states: “Urban areas, while generally lower in biodiversity than rural areas, can contain a range of wildlife, plants and habitats. Developments designed with space for nature can even increase species diversity and abundance... Some species are considered ‘urban specialists’. For example, swifts, which nest in cavities in the roofs of older buildings. Urban specialist birds are a good biodiversity indicator for urban areas, because good quality, long-term data is available, and much is known about their ecology and some of the pressures affecting them.

Urban specialist birds have declined in abundance in the UK since 1994... Factors contributing to some of these species declines include building demolition, renovation and roof repair (Land use and biodiversity).

- **National Planning Policy Framework update (2021)**²¹ states: “enhance public access to nature where this is appropriate” (Section 180d, page 52).
- **National Model Design Code: part 2 - guidance notes (20/07/21)**²² states: “Integrating Habitats: Biodiversity can be enhanced through facilitating habitats and routes for wildlife, for example, incorporating trees, wildflowers, ponds, bat and bird boxes, bee and bird bricks and hedgehog highways” (Section N.3 Biodiversity, page 25).
- **Taylor Wimpey Environment Strategy 2021: Building a Better World.**²³
- **Taylor Wimpey: We create new homes for endangered swifts** - press release 10/01/22.²⁴
- **BS 42021 Biodiversity and the built environment: Specification for the Design and Installation of Bird Boxes** (proposed publication start date 07/02/22).²⁵
- **Natural England: Wild birds: advice for making planning decisions (14/01/22)** states: “Avoidance, mitigation and compensation measures: The proposal should include measures to replace nesting sites with: nest boxes (ideally integrated into brickwork) for birds in conservation need, such as house sparrow, starling and swift.”

Useful websites

- **Swift Conservation** - <https://www.swift-conservation.org/>
- **Action for Swifts** - <https://www.actionforswifts.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 integrated nest boxes 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>.

Authors: Camilla Barlow, Mike Priaulx, and SLN Swifts & Planning Group Issue 03, January 2022

ENDNOTES

- 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>
- 4 <https://drive.google.com/file/d/0B4CpCORtOQdTRTNySEnUXdoNTQ/view>
- 5 https://www.sustainabilitywestmidlands.org.uk/wp-content/uploads/Planning_for_a_healthy_environment_report.pdf
- 6 Gunnell, K., Murphy, B. and Williams, C., Designing for Biodiversity: A technical guide for new and existing buildings, RIBA Publishing & Bat Conservation Trust (2013)
- 7 <https://www.rspb.org.uk/our-work/rspb-news/news/stories/the-duchy-of-cornwall-giving-swifts-a-home/>
- 8 <https://www.cornwall.gov.uk/media/v1roqk0x/planning-for-biodiversity-and-net-gain-spd-v11.pdf>
- 9 https://www.oxford.gov.uk/downloads/file/7550/tan_8_biodiversity
- 10 <https://new.brighton-hove.gov.uk/news/2020/helping-swifts-find-safe-haven-brighton-hove>
- 11 <https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Swift%20Guidance.pdf>
- 12 <https://www.brighton-hove.gov.uk/sites/default/files/migrated/article/inline/Proposed%20Submission%20City%20Plan%20Part%20Two%20April%2025%202020%20PRINTERSa.pdf> (DM37 paragraph 2.281, pages 114-115)
- 13 <https://www.gov.uk/government/publications/national-planning-policy-framework--2>
- 14 <https://www.gov.uk/guidance/natural-environment>
- 15 <https://www.gov.uk/government/publications/living-with-beauty-report-of-the-building-better-building-beautiful-commission>
- 16 <https://www.gov.uk/government/news/brookshire-orders-house-builders-to-protect-wildlife>
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- 18 https://www.nhbcfoundation.org/wp-content/uploads/2021/05/S067-NF89-Biodiversity-in-new-housing-developments_FINAL.pdf
- 19 <https://cieem.net/swift-bricks-the-universal-nest-brick-by-dick-newell/>
- 20 <https://www.gov.uk/government/publications/state-of-the-environment/the-state-of-the-environment-the-urban-environment>
- 21 <https://www.gov.uk/government/publications/national-planning-policy-framework--2>
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- 24 <https://www.taylorwimpey.co.uk/news/we-create-new-homes-for-endangered-swifts>
- 25 <https://shop.bsigroup.com/products/bs-42021-integral-nest-boxes-design-and-installation-for-new-developments-specification/standard/preview>