5920 Comment

**Document Element: Policy NB2: Biodiversity** 

Respondent: Swifts Local Network: Swifts & Planning Group

Date received: 31/05/2024 via Web

Summary:

Modifications required:

Please add to Policy NB2: 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 or CIEEM. 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.

## Full text:

Modifications required:

Please add to Policy NB2: 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 or CIEEM. 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.

In more detail, the reason for this is:

The reference to bird boxes in Part E/Chapter 12, policy NB2 Biodiversity is welcome but it is not sound because there is insufficient detail to be effective, and it is not consistent with national policy, because it does not consider NPPG 2019 Natural Environment paragraph 023 which highlights the importance of swift bricks. Swift bricks are excluded from the DEFRA Biodiversity Net Gain metric so need a separate clear policy. 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 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.

Swift bricks are universal nest bricks for small bird species, 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), which are essential to save a variety of endangered red-listed urban building-dependent small bird species such as swifts and house sparrows.

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.

## Change suggested by respondent:

Legally compliant: Not specified

Sound: Not specified

Comply with duty: Not specified

Attachments: None