



20th October 2021

Planning Officer
Havant Borough Council

Dear Ms Wells

Re: Planning Application No. App/21/00989. Outline planning application for the development of 150 dwellings (3-bed; 4-bed and 5-bed dwelling houses and 1-bed and 2-bed apartments) addressing layout, scale and access, including biodiversity enhancements and buffers and species-specific enhancements, SUDS and car parking (with appearance and landscaping matters reserved). | Cabbagefield Row, opposite 123-133, Swanmore Road, Havant

I am writing to you on behalf of Hampshire Swifts, a charity devoted to the conservation of Swifts in Hampshire and part of a national network of Swift groups throughout the UK.

The purpose of this letter is to request that planning consent for the above-mentioned development, if granted, includes a requirement for multiple integral bird nest sites for House sparrow, Starling and Swift.

In their ecological appraisal, ECOSA state that 20% of dwellings will have integral bird nest boxes (bricks) (either for House Sparrows or for Swifts). Appendix 9 indicates that they propose 30 integral bird nest boxes for 150 dwellings. We strongly support the proposal to include integral nest boxes but would like to make two points. Firstly, while House Sparrows can nest in Swift nest boxes, Swifts are unable to nest in Sparrow nest boxes. It is therefore important to use integral Swift bricks. Integral Swift bricks are in effect a universal nest brick as they are readily used not just by Swifts but also by several other bird species, including red-listed species such as House Sparrow and Starlings. Secondly, the density of integral nest bricks is far too low. The RIBA and conservation organisations recommend that integral nest bricks are installed in an average ratio of one per dwelling. The National House Building Council Foundation in their recent report 'Biodiversity in New Housing Developments' make similar recommendations. The integration of nesting sites for birds is supported by the following national policy and guidance:

- Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006, 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 174(b) of the revised National Planning Policy Framework (NPPF, 2019), states: **"To promote and enhance biodiversity and geodiversity, plans should: ...identify and pursue opportunities for securing measurable net gains for biodiversity..."**. This is explained further by the accompanying guidance notes (NPPF, Natural Environment Guidance, paragraph 023): "...relatively small features



can often achieve important benefits for wildlife, such as **incorporating 'swift bricks'** and bat boxes in developments..."

- Furthermore, the government's support for such measures was stated explicitly in the accompanying government press release: "...expectations on how developers can protect specific species, including using **hollow swift bricks – which are installed into the walls of new build homes, allowing the birds to nest safely.** <https://www.gov.uk/government/news/brookshire-orders-house-builders-to-protect-wildlife>.

The above is of particular relevance to 3 species of bird, the red-listed House sparrow and Starling and the amber-listed Swift (expected to be red-listed at the next review). All 3 species are undergoing major declines caused mainly by the loss of nesting sites on existing houses 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. **All these species readily use Swift bricks when these are integrated into new developments.**

Integration of Swift bricks is very easy to include into routine building practices and results in a permanent, discrete, maintenance-free biodiversity enhancer which will provide much-needed breeding spaces for declining species of birds.

We strongly recommend that installing an average of 1 Swift brick per dwelling is made a condition of the consent if granted
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Further information on Swift bricks, including advice on where they should be installed and how many to use can be obtained from Hampshire Swifts, info@hampshireswifts.co.uk.

Yours sincerely

Professor Catharine Gale
Trustee of Hampshire Swifts