



11th March 2022

Planning Officer
Havant Borough Council

Dear Mr Christie

APP/22/00001 | Demolition of Nos 61-69 Fathoms Reach (inclusive) and development of 51 dwellings, to include 19 No. 2 bed, 18 No. 3 bed, 4 No. 4 bed, 3 No. 1 bed apartments and 6 No. 2 bed apartments, with play area and associated infrastructure; new vehicular and pedestrian access to Fathoms Reach and footpath link to Southleigh Grove; includes works to trees the subject of Tree Preservation Order No.1249. | Land to the rear of 49 - 71, Fathoms Reach, Hayling Island

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 application, if granted, includes a requirement for multiple integral Swift bricks.

In their ecological appraisal, Eco Support recommend that all details of biodiversity enhancements are provided at a later stage in a BEMP. The proposed development, if approved, provides an opportunity to provide multiple, permanent integrated nest sites in the new homes for crevice nesting birds. The Royal Institute of British Architects (RIBA) and conservation organisations recommend an average of 1 integral nest brick per dwelling. **We request that there should be an average of 1 integral Swift brick per dwelling in this proposed development. Swift bricks are a universal nest brick as they are readily used not just by Swifts but also by House Sparrows, Starlings, Great Tits, Blue Tits and other species.**

The integration of nest sites for birds is in keeping with 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..."**



Hampshire Swifts

- 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>.
- **NHBC Foundation: Biodiversity in new housing developments: creating wildlife-friendly communities (April 2021)** 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'" page 42).

Swift, House Sparrow and Starling are all now red-listed because they are at high risk of extinction. 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 and the lack of nest sites in new buildings. Swifts, for example, have experienced a catastrophic decline of nearly 60% in the last 20 years and are continuing to decline at around 5% per annum. **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.

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



Trustee of Hampshire Swifts