From:	Stephen Fitt
To:	Planning Policy
Cc:	Angela King
Subject:	Re: Broadclyst Neighbourhood Plan Regulation 16 Consultation
Date:	30 August 2022 10:50:26
Attachments:	image001.jpg 0.jpg universal nest brick 0122 (2) (2) (2) (5).pdf 40476_Thames_Urban Wildlife leaflet_JUL21_Pages (4).pdf

Dear Angela

thank you for inviting the RSPB to comment on the above we were disappointed that so little reference was made to protecting and enhancing the Biodiversity of the Parish.

The natural flora and fauna that are commonly found in our towns and villages provide a great deal of pleasure to the majority and it is generally accepted that their presence enhances our health and wellbeing.

The National House Builders Council acknowledged this in https://www.nhbcfoundation.org/publication/biodiversity-in-new-housing-developments-creating-wildlife-friendly-communities/ published last year which combines design concepts, practical solutions and best practice case studies that place ecosystems at the centre of the house-building process. It looks in detail at building new homes in a sustainable way that enhances wildlife, develops climate resilience, and improves people's health and wellbeing.

This complies with both Local and National guidelines on Sustainable Development, Biodiversity Net Gain and Best Practice.

Biodiversity net Gain is one of the Governments Flagship projects:

Everything you need to know about biodiversity net gain | Ecology by Design

is a comprehensive guide to what is required, but it does not include steps to enhance the Biodiversity of new buildings or major renovation projects however creating an Urban Ecosystem that provides for the species that occupy our towns and villages is considered to be Best Practice.

Indeed Taylor Wimpey adopted https://www.taylorwimpey.co.uk/corporate/sustainability/environment-strategy last year, they intend to install:

- Hedgehog highways from 2021.
- Bug hotels (at least 20% of homes) from 2021.
- Bat boxes (at least 5% of homes) from 2022.
- Bird boxes (at least 80% of homes) from 2023
- Wildlife ponds from 2024.
- Reptile and amphibian hibernation sites from 2025.
- All new sites have planting that provides food for local species throughout the

seasons

The recently published British Standard "BS42021:20221 Integral Nest Boxes Selection and Installation for New Developments" Section 8.4.1 recommends that the numbers of "nest bricks" on new residential developments shall at least equal the number of new dwellings.

We recommend boxes that were originally designed for swifts but will be used by the majority of species that nest/roost in the cavities found in older buildings or mature trees, see first attachment, for illustration purposes have also attached a brochure of the steps recently adopted by national Developers Cala Homes for all their new projects which explains what they plan to do and the reasons for doing so !!

We recommend that the above are incorporated in the Parish Plan.

Regards,

Stephen Fitt
RSPB England, Exeter Office
4th Floor (North Block), Broadwalk House, Southernhay West, Exeter, Devon, EX1 1TS

rspb.org.uk

From: Planning Policy
Sent: 30 June 2022 13:10
To: Angela King
Subject: Broadclyst Neighbourhood Plan Regulation 16 Consultation

Dear All
I am writing to advise that the Broadclyst 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.
The submitted Neighbourhood Plan and supporting documents are available to view on/via our website:
Neighbourhood Plans being produced in East Devon - Broadclyst - East Devon.
The consultation is open for 10 weeks from today until **8th September 2022**.
Please note that as well as an allowance for the summer holiday period, the longer period for this consultation (beyond the statutory 6 weeks) reflects the length and breadth of this plan, which includes a number of proposed sites for development, 38 policies, with a wide range of supporting documentation. Should you wish to comment, your early attention would therefore be encouraged where possible.
Please send comments (preferably using the form attached) to: planningpolicy@eastdevon.gov.uk.
The attached Notice gives full details of the consultation.
My contact details are below if you have any queries or need more information.
Please do also let me know if you do not wish to receive future neighbourhood plan notifications, providing an alternative contact where appropriate, so we can ensure our mailing list remains up to date.
Thanks in advance for your time,
Angela

Angela King MRTPI
Neighbourhood Planning Officer
East Devon District Council
aking@eastdevon.gov.uk
Direct: 01395 571740
Switchboard: 01404 515616
Typical working days: Monday to Thursday
www.eastdevon.gov.uk
Blackdown House, Border Road,
Heathpark Industrial Estate,
Honiton, EX14 1EJ

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URBAN WILDLIFE STRATEGY

CALA Homes (Thames) recognise the importance of the climate emergency and the vital role that maintaining and enhancing biodiversity and habitats plays as part of an integrated response. We also recognise that the UK desperately needs new housing and we are proud to be one of the UK's highest quality homebuilders.

Photography from a previous CALA development

Stock photography

A PROACTIVE RESPONSE

Whilst in the past the ecological credentials of our developments have been driven solely by the requirements of the planning system, we now recognise that we need to respond in a much more proactive manner. This is particularly the case where we have historic developments granted planning permission at a time when the extent of the climate emergency and biodiversity degradation was not as fully understood or accepted as it is today.

FINDING
A BALANCE

We acknowledge that there will be people who fundamentally object against the loss of green fields for new housing. However, the reality is that just as we are in the middle of a climate emergency, we are also in the middle of a chronic housing shortage which, if left unaddressed, will disadvantage future generations for years to come whose aspirations of home ownership will remain unfulfilled.

Photography from a previous CALA development

OUR APPROACH

CALA passionately believe that housing delivery and biodiversity enhancements are not mutually exclusive and as an overarching approach, all developments moving forward will achieve net biodiversity gain. This includes looking at the sustainability of a development in the round including energy efficiency, renewable energy generation, electric vehicle charging, sustainable urban drainage, tree planting and habitat creation including wildflower meadows.

TALK TO
THE EXPERTS

However, following engagement with groups including the Hampshire Ornithological Society and Hampshire Swifts, we have asked our ecologist, RPS Group, to look specifically at the opportunities for integrating urban wildlife opportunities into each home and garden that we build. This recognises that new developments, rather than being wildlife deserts, can in fact boost habitat opportunities, especially for those species that thrive in more of an urban environment.

Stock photography

Stock photography

THE PLAN OF ACTION

This report has helped us outline a strategy that will allow us to optimise opportunities for urban wildlife throughout all of our developments including those that already benefit from planning permission. It does not represent the extent of our aspirations from a biodiversity and habitat creation perspective but instead looks to establish a baseline level of urban wildlife opportunities which will be included on each of our housing plots moving forward, regardless of where in our region the development falls or what the planning permission asks for.

THE STRATEGY

The recommendations for all CALA (Thames) homes will incorporate the following:

- An average of one swift brick per plot across the development;
- Recognising that as some swift bricks will be clustered for colony establishment purposes, ensuring that each property still has at least one integrated bird nesting feature;
- Each property having at least one bat roosting feature;
- Each property having at least one invertebrate brick (in boundary walls);
- Where the rear garden of the property adjoins other gardens or any other form of green space, including hedgehog friendly fencing;
- Where a rear garden has a depth of at least 10 metres, including one native tree sapling as standard.

Photography from a previous CALA development

Stock photography

CHANGES IN THE UK'S BIRD HABITATS

Many bird species have suffered significant declines over recent decades. For example, swift numbers have declined by 53% between 1995 and 2016 while house sparrow populations have decreased by 60% since the 1970s.
At least part of these decreases has been ascribed to the loss of nest sites caused by modern buildings and the renovation of older buildings that may have historically provided nesting opportunities.

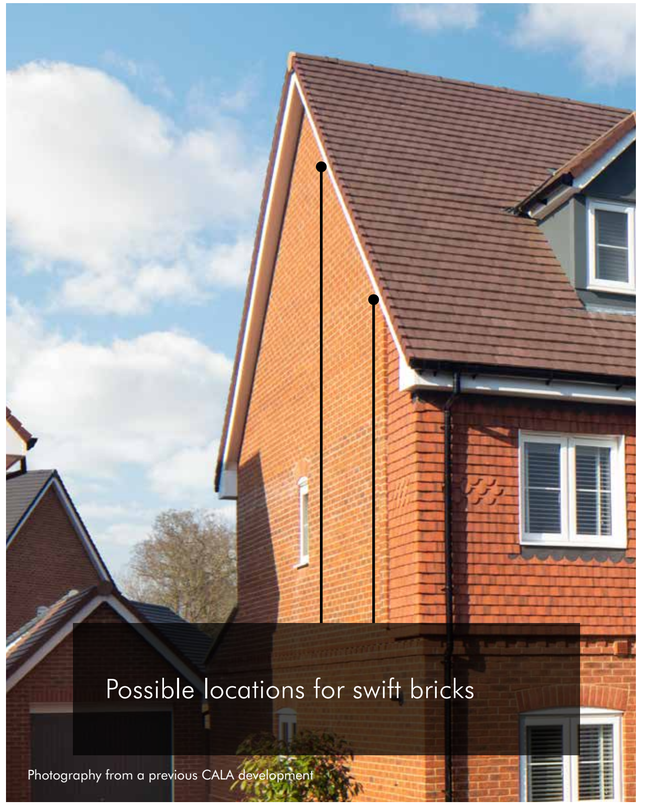
BIRD NESTING

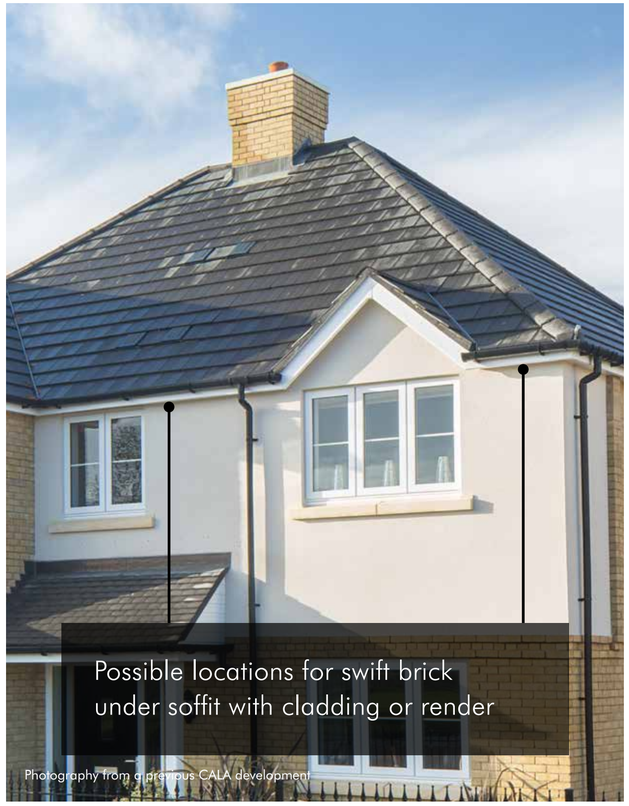
To help address this, all new CALA homes (Thames) will incorporate nesting opportunities for a range of urban bird species. Given their use by other species as well as swifts, this will be an integrated swift brick, considered a universal bird nesting feature.

CALA's houses are of brick construction. Therefore, such features will be fitted into gables, as high as possible, and near to the roof overhang to ensure they are sheltered.

On some streets, swift bricks will be clustered in groups of 3-5 on a single house, in particular adjacent to suitable foraging habitat. In this instance, all three locations in the above example would be chosen for a swift brick.

If cladding or render is used on the façade of a house, an external swift box will be fitted under the soffits in an appropriate location.






Stock photography

LOOKING OUT
FOR THE BATS

UK bat populations have declined over recent decades due to a variety of factors, including loss of foraging habitat and roosting sites as well as severance of habitats by roads. However, although some bat species are very photophobic and will avoid all sources of light, some species (such as the common pipistrelle) will actively forage around street lights, which attract insects, and can therefore thrive in urban settings, if they have roosting locations on modern buildings.

BAT ROOSTING

Therefore, to help support urban bat species, all new homes will incorporate an integrated bat roosting feature. This could be in the form of a bat box such as that adjacent, or it could be a less obvious feature such as the one below which is incorporated into the fabric of the wall with only the entrance showing.

Bat roosting features such as these shown will be incorporated into similar parts of the houses to the swift bricks, spread high on gable ends or under soffits on front/rear elevations.

In addition, where hanging tiles are used on new buildings, bat access tiles will be incorporated into the hanging tiles (at least one on each elevation). Although they will be blocked off behind to prevent access into the wall/loft space, they will provide opportunistic roosting for crevice dwelling bats, imitating the roost choices of these species on damaged/old roofs where tiles have lifted/slipped.


Photography from a previous CALA development


Photography from a previous CALA development


Stock photography

Stock photography

INVERTEBRATE BRICKS IN BOUNDARY WALLS

Invertebrates are critical to the majority of food chains with large numbers of species relying on them for both food and pollination. Significant numbers of species have also declined in their own right due to habitat loss.

To encourage invertebrate populations, boundary walls to all properties that feature masonry will include bee bricks to encourage solitary bees and other invertebrates. They will be set low in walls and near to areas of planting to help facilitate pollination.

PRICKLY
GARDEN VISITORS

Hedgehogs are a well-known urban species whose numbers have declined significantly with numbers estimated to have fallen by up to 30% since 2000 in urban settings. Although the exact cause of the decline has not been determined, it is thought that gardens with impermeable (to a hedgehog) fencing prevents hedgehogs moving between foraging habitats, restricting their range.

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HEDGEHOG
FRIENDLY FENCING

Hedgehog-friendly fencing will be used to ensure permeability for this species through the site adjacent to areas of open space and where there are interconnecting gardens. This will be created by cutting small holes at the base of fence panels and installing a small cover such as that adjacent to highlight what the gap is for.

Information and maintenance tips on how to look after each of the implemented urban wildlife features included on dwellings will be provided to new homeowners in their welcome packs. This will provide valuable education on the vital role that maintaining and enhancing biodiversity and habitats plays in the delivery of new housing.

BUILDING WITH A CONSCIENCE

Find out more about how CALA Homes (Thames) are putting their urban wildlife strategy into practice:

Email: ThamesGreenTeam@cala.co.uk

CALA Homes Thames
CALA House, 54 The Causeway,
Staines-Upon-Thames, Surrey, TW18 3AX.

CALA HOMES

Legal & General HOMES

Photography from a previous CALA development

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 biodiversity[1], and swift bricks are specifically highlighted in national planning guidance as providing important benefits to wildlife[2].

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 Newquay[7].

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 m^2 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).
- **CIEEM 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/0B4CpCORtOQdTRTNYSENnUXdoNTQ/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/brokenshire-orders-house-builders-to-protect-wildlife

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

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

22 https://www.gov.uk/government/publications/national-model-design-code

23 https://www.taylorwimpey.co.uk/corporate/sustainability/environment-strategy

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