

Swifts Local Network – Swifts and Planning Group Representation by email:

From: Swifts & Planning Advice <swifts.planning@gmail.com>

Sent: 17 March 2025 07:28

To: Planning Policy <PlanningPolicy@eastdevon.gov.uk>

Subject: comments - Clyst St Mary and Sowton updated Neighbourhood Plan

Dear Planning Policy team,

The "*Natural Environment and Countryside*" (chapter 7) section of the updated Neighbourhood Plan is welcome, but please consider building-dependent wildlife such as red-listed bird species which inhabit buildings in Clyst St Mary and Sowton, especially significant here due to the number of unmodernised older buildings which have a greater tendency to host these species.

Therefore, please add: Swift bricks are a universal nest brick for small bird species and should be installed in new developments including extensions, in accordance with best practice guidance such as BS 42021 or CIEEM. Artificial nest cups for house martins may be proposed instead of swift bricks where recommended by an ecologist.

(This would be in line with East Devon (Regulation 19) policy PB07, although that policy currently only considers house martins for major developments for which it suggests overhanging eaves but if uPVC or away from mud sources this is of limited benefit.)

Also please add: Existing nest sites for building-dependent species such as swifts and house martins should be protected, as these endangered red-listed species which are present but declining in Clyst St Mary and Sowton return annually to traditional nest sites. Mitigation should be provided if these nest sites cannot be protected.

In more detail for supporting evidence:

The reason for this is that nest sites in buildings and bird boxes/ bricks and other species features are excluded from the DEFRA Biodiversity Net Gain metric, so require their own clear policy.

The Government's response in March 2023 to the 2022 BNG consultation stated that: "*We plan to keep species features, like bat and bird boxes, outside the scope of the biodiversity metric... [and] allow local planning authorities to consider what conditions in relation to those features may be appropriate*" (page 27, https://consult.defra.gov.uk/defra-net-gain-consultation-team/technicalconsultation_biodiversitymetric/).

NPPF December 2024 Paragraph 187 (d) (page 54) states: *"planning policies should... incorporate features which support priority or threatened species such as swifts"*.

Swift bricks are the only type of bird box specifically mentioned as valuable to wildlife in national planning guidance, along with bat boxes and hedgehog highways (NPPG Natural Environment 2019 paragraph 023). 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 considered a universal nest brick suitable for a wide range of small bird species including swifts, house sparrows and starlings (e.g. see NHBC Foundation: Biodiversity in New Housing Developments (April 2021) Section 8.1 Nest sites for birds, page 42: <https://www.nhbc.co.uk/foundation/biodiversity-in-new-housing-developments>).

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 better thermal regulation with future climate change in mind.

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 local authorities are including detailed swift brick requirements in their plans, such as Tower Hamlets Local Plan Regulation 19 stage (paragraph 18.72, page 328 - <https://talk.towerhamlets.gov.uk/local-plan>),

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.

Many thanks.

Yours sincerely,

Mr Michael Priaulx
Chair of Swifts Local Network: Swifts & Planning Group

Email: swifts.planning@gmail.com

Tel. [REDACTED]