

3rd October 2022

Planning Officer
Eastleigh Borough Council

Dear Ms Harrison

F/22/93194 Full planning application for the erection of 185 dwellings, a 71-bedroom care home (Use Class C2), a 142-bedroom hotel (Use Class C1), a well-being centre (Use Class E / F2), a new pavilion building and improvements to existing stadium, new vehicular access, car parking, pedestrian circulation and processional ramp, together with associated tree planting, landscaping, SuDS and biodiversity enhancements. The Ageas Bowl, Marshall Drive, Westend.

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 the dwellings, the hotel and the well-being centre, installed in accordance with the British Standard BS 42021:2022 Integral nest boxes.

In their Ecological Impact Appraisal Johns Associates say that 20 swift boxes (multiple cavity types) will be installed under the eaves of the residential dwellings. This is welcome but grossly inadequate for the size and nature of this development and contrary to current best practice both in terms of design of the nest box and in terms of numbers. Current best practice guidance dictates that nest boxes on buildings should be integral swift brick types, as these are permanent, require no maintenance, have better temperature regulation with future climate change in mind, and are aesthetically integrated with the design of the development. Swift bricks are a universal nest brick as they are readily used not just by Swifts but also by House Sparrows, Starlings (provided the entrance is large enough), Great Tits, Blue Tits and other species. The British Standard BS 42021:2022 Integral nest boxes recommend at least 1 integral nest brick per dwelling, from four to 10 on a small block of flats and 10 to 40 or more on a large building, such as a hotel etc. We request that swift bricks should be installed in accordance with British Standard BS 42021:2022 Integral nest boxes.

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."**



Hampshire Swifts

- 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/brokenshire-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).
- CIEEM (In Practice, June 2019) state: “resulting in an equal number overall of nest sites and residential units” (How Many Nest Bricks? page 40) <https://cieem.net/resource/the-swift-a-bird-you-need-to-help/>

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. **Between 1994 and 2021, for example, Swifts declined by 62% in the UK as a whole and by 70% in the South-East. 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 saces 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.

A summary of the British Standard BS 42021:2022 Integral nest boxes is given overleaf.

Yours sincerely
Prof Catharine Gale
Trustee of Hampshire Swifts



Summary of British Standard BS 42021:2022 Integral nest boxes

The standard is aimed at building-integrated nest boxes for the following cavity nesting species (although other species may potentially use the boxes): Swift, Starling, Great Tit, Blue Tit, House Sparrow.

The document notes that House Martins do sometimes use nest bricks [e.g. Schwegler 1A bricks], and there are further details of nest cups as stated below.

The standard does not cover glass buildings - which are often inappropriate locations to attract birds, nor metal frame buildings with insulated or fire-rated cladding which have additional considerations, nor exterior nest boxes.

An installation plan must be prepared in consultation with interested parties, and on completion the local authority must be sought to confirm suitable installation.

Integral nest boxes must be installed in all new developments (in cases where BS 42021 is specified), including modular pre-fabricated construction, with the exception of buildings in or near fully glazed buildings due to collision risk.

Integral nest boxes must be weather resistant, temperature change resistant, and have easy entrance and exit.

<i>Internal dimensions of integral nest boxes</i>			
	Preferred	Minimum dimensions	
Floor area	>400 cm ²	300 cm ²	
Shorter floor dimension	>14 cm	10 cm	
Headroom	>10 cm	7.5 cm	
These dimensions ensure there is adequate space for a brood of, for example, three nestling swifts and two parents, as well as adequate space for swifts to manoeuvre without difficulty. As such, this provides adequate space for target species.			
Some examples of successful integral nestboxes have floor dimensions of: (10 cm x 30 cm), (17.5 cm x 20 cm) and (18 cm x 40 cm). Internal heights range from 7.5 cm to 17.5 cm			

External dimensions to be compatible with standard brick and/ or block sizes.

Entrance hole to be less than 50mm from the floor of the box, or the inside to provide grip to enable the birds to easily climb out of the box.

Entrance hole to be minimum 30mm x 65mm, except where a suitably competent person advises 28mm x 65mm to exclude starlings and favour smaller species.

Integral nest boxes to be labelled top/ bottom for installation.



Summary of British Standard BS 42021:2022 Integral nest boxes cont.

Integral nest boxes to be constructed of materials that prevent high levels of humidity and are resistant to overheating and cooling.

Integral nest boxes shall be installed in buildings dispersed around the development site. The positioning of integral nest boxes shall take into account: a) open sources of clean water accessible to birds; b) suitable habitat within and around the development for birds to occupy, and c) suitable nearby natural sources of food through provision of suitable habitat; and minimise potential for droppings nuisance.

The following positions shall be avoided: 1) areas that are exposed to extended periods of direct sunlight or prevailing weather conditions; 2) near perches that could be used by avian predators; and 3) areas where cats, rats and squirrels have easy access, e.g. near ledges.

Integral nest boxes shall be a) in gable ends or under eaves; b) inserted into walls: 1) backing onto cold voids, i.e. adjacent to the roof space; and/or 2) where installation of the box avoids cold (thermal) bridging; c) in association with external wall features, e.g. under eaves, near the verge in a gable, beneath ledges and inserted into parapets; and d) at a suitable height above ground: for buildings up to three storeys at the highest possible point, and for buildings over three storeys the integral nest boxes shall be a minimum of 4m above ground level.

New residential developments to have a number of integral nest boxes at least equal to the number of dwellings, i.e. the ratio of integral nest boxes to dwellings is 1:1. In practice this means that some dwellings could receive more than one box while others might contain none due to suitability of the location.

For larger developments, the number of integral nest boxes to be installed shall be *“proportionate to the size and design of the building”*.

For colonial species, integral nest boxes shall be installed close together, e.g. two boxes located in every other house, or three in every third dwelling.

To encourage swifts, integral nest boxes shall be installed so that there are: a) two to four on a medium to large house; b) from four to 10 on a small block of flats; and c) 10 to 40 or more on a large site, such as a school, hospital, warehouse, or a major apartment development.

Swallows and house martins can be accommodated using commercially available man-made swallow cups and house martin nests, which should be positioned: a) for swallow cups: in open access structures, such as pergolas, verandas, open entrance lobbies, open-sided car ports, or suitable open-sided structures; and b) for house martin nests: under eaves. To reduce mess, boards to catch droppings can be installed under the nest site. Provision for swallows and house martins can be provided in any suitable location on site, such as open-sided car ports and garages.