

13<sup>th</sup> August 2021

Planning Officer  
New Forest District Council

Dear Mr Simmonds

**Re: Planning Application No. 21/10938. Demolition of existing building and redevelopment of the site to form 32no. Retirement apartments including communal facilities, access, car parking and landscaping | Former POLICE STATION, SOUTHAMPTON ROAD, LYMINGTON SO41 9GH**

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 includes a requirement for multiple integral nest sites for House sparrow, Starling and Swift.*

We were pleased to see that in their preliminary ecological appraisal, Tetra Tech say that the new building will incorporate 'a minimum of two bird (swift chamber) boxes', but we request that this number is greatly increased. The RIBA, and conservation bodies recommend an average of 1 integral nest brick for birds per dwelling. The National House Building Council Foundation in their recent report 'Biodiversity in New Housing Developments' make similar recommendations. Such integration of nesting sites 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/brokenshire-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.**

**We strongly recommend that installing at least 20 integral Swift bricks is made a condition of the consent if granted, using the suggested wording:**

*Prior to the commencement of development, a Plan shall be submitted to and approved in writing by the LPA of integral Swift Bricks within buildings. The agreed Plan shall show the number, specification of the Swift Bricks and where they will be located, together with a timetable for implementation and commitment to being installed.*

*Following completion of the dwellings and prior to their first occupation, a report from an appropriately qualified ecologist confirming that all integral Swift Bricks have been installed as per previously agreed specifications and locations together with photographic evidence shall be submitted to and approved in writing by the Local Planning Authority.*

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](mailto:info@hampshireswifts.co.uk).

Yours sincerely

Catharine Gale  
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