

10th August 2023

Rachael Simpkin, Planning Officer
High Peak Borough Council

Re: Planning Application No. HPK/2022/0352: Land At, Granby Road, Fairfield, Buxton, Derbyshire

I am writing on behalf of the Derbyshire Swift Conservation Project, an organization working to conserve Swifts in Derbyshire and part of a national network of Swift groups throughout the UK.

The Extended Phase 1 Habitat Survey omits any recommendation for biodiversity enhancements in the form of integrated nest bricks despite best-practice guidance stating that ecological enhancement for declining urban bird species should take the form of Swift bricks integrated into the façade.

Integrated nest bricks are preferable to external nest boxes as they become a permanent feature of the building, require zero maintenance, are aesthetically integrated with the design of the building, are less vulnerable to vandalism and have better thermal regulation with future climate change in mind. Additionally, such bricks are considered a universal nest brick for urban bird species, including red-listed species such as Common Swift, House Sparrow, House Martin, and Starling.

<https://cieem.net/swift-bricks-the-universal-nest-brick-by-dick-newell/>

<https://cieem.net/wp-content/uploads/2019/06/9.pdf>

Best-practice guidance has recently been made available with the publication of **British Standard BS 42021:2022 "Integral Nest Boxes – selection & installation for new developments"**:
<https://knowledge.bsigroup.com/products/integral-nest-boxes-selection-and-installation-for-new-developments-specification-1/standard>

One key element of this guidance is that all integral nest boxes should be Swift bricks, as these can be safely used by all small bird species including Swifts. Also, it sets out the numbers required as follows:

- ***"To provide new and enhanced opportunities for nesting, the number of integral nest boxes on new residential developments shall at least equal the number of dwellings, i.e. the ratio of integral nest boxes to dwellings is 1:1. "***
- ***"External nest boxes are additional to the installation of integral nest boxes on new developments and should not be included as part of the 1:1 ratio."***

British Standard BS 42021:2021 is available only by subscription but the key elements are summarized on the NHBS blog <https://www.nhbs.com/blog/universal-nest-bricks>.

The integration of universal nest bricks is also supported by the National House Building Council Foundation, the standard-setting body for new homes: **Section 8.1 Nest sites for birds (page 42): "Provision of integral 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'":**

https://www.nhbcfoundation.org/wp-content/uploads/2021/05/S067-NF89-Biodiversity-in-new-housing-developments_FINAL.pdf

Additionally, 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...”*** and 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...”***

As such it would seem appropriate that this development is built incorporating a reasonable number of Swift bricks (otherwise known as “universal bricks”) so providing nest sites suitable for all these rapidly declining urban bird species. The density we propose is supported by the recently published British Standard (see above).

We request that a condition is imposed to ensure this development is built with up to 147 internal nest bricks (i.e. 1 brick per dwelling) designed for Swifts as a universal biodiversity enhancement for urban bird species and that photographic evidence of installation is made available upon completion.

Suggested planning condition:

An integral swift nest box plan for the selection, siting, positioning and installation of integral swift nest boxes, such as swift bricks incorporated within the external walls of the development, should be submitted to, and approved in writing by, the local planning authority.

The integral swift nest box plan should be prepared in accordance with the requirements of BS 42021 or equivalent best practice guidance and should identify, as a minimum:

- a) the type and number of integral nest boxes to be installed;
 - b) the specific buildings on the development into which boxes are to be installed, shown on appropriate scale drawings;
 - c) the location on each building where boxes are to be installed, shown on appropriate building plans and elevations.
- A statement of good practice including photographs should be submitted to the local planning authority prior to the discharge of this condition, demonstrating that the boxes have been selected and installed in accordance with BS 42021.

The integral nest box plan should be implemented in accordance with the approved details and all boxes retained in that manner thereafter.

Reason: To enhance the biodiversity of the site in line with National Planning Policy Guidance Natural Environment 2019 paragraph 023.

We are happy to provide further advice and assistance.

Yours faithfully

Andy Broadhurst