

From: Hancock [REDACTED]
Sent: 10 August 2021 14:26
To: planning <planning@boston.gov.uk>
Subject: Planning Application B/21/0345

The Limes
Meer Booth Road
Antons Gowt
Boston
PE22 7BG
[REDACTED]

10/08/2021

Planning Department
Municipal Buildings
West Street
Boston
PE21 8QR

Dear Consultant Planning Officer

Application reference: B/21/0345
Proposer: Silk Road Assets Ltd
Location: 125 High Street Boston

I wish to comment on this planning application. **If your authority intends to grant permission for this planning application, I would be grateful if some swift nesting bricks could be incorporated although I am not sure looking at the drawings if this will be possible. The site is excellent, near to an existing colony and further nest sites would increase the colony size. This would certainly provide enhancement for biodiversity.**

Designing for and installing swift bricks into the fabric of the renovation is easy, inexpensive, and will last the life-time of the building.

More information on integral nest sites and location guidance is in the annex.

Installing integral swift bricks would contribute to the objectives of the national legislation and planning policy set out below and demonstrate the commitment of your authority to protecting and enhancing biodiversity.

Section 40 of the **Natural Environment and Rural Communities (NERC) Act 2006^[1]**, 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."*

This is supported by the **National Planning Policy Framework (NPPF) 2018**^[2] in **paragraph 175d**:
When determining planning applications, local planning authorities should apply the following principles: “..... opportunities to incorporate biodiversity improvements in and around developments should be encouraged.”

Defra quote [response given to petition for protection of swift nests]:

“All local authorities have a duty to have regard to conserving biodiversity as part of their policy or decision making. As well as this duty, national planning policy states that the planning system should minimise impacts on biodiversity and provide net gains in biodiversity where possible. Specific biodiversity features, such as swift bricks, would normally be required of developments through either the relevant local plan or through the local authority’s development control team. ...”

Nationally swift numbers have decreased by 57% in the last 20 years. Locally it is thought that swift numbers have declined even more by around 90% according to older local birdwatchers. The losses of the species numbers is almost entirely due to roof repair or renovation or sometimes building demolition. Central Boston is a good example of this where 30 years ago screaming parties of 60 or 70 birds was not uncommon and well known among the birdwatching society. Now a party of 8 or 10 birds is a good record. The species decline in such a short space of time both nationally and locally will in a few short years lead to the extinction of the birds as a breeding species.

May I respectfully point out that the South East Lincolnshire Local Plan does make mention of the need to use swift nesting bricks on new developments. This would help minimise the decline of the species.

Please see the attached annex – swifts and built environment.

Yours sincerely

Barry Hancock

[1] http://www.legislation.gov.uk/ukpga/2006/16/pdfs/ukpga_20060016_en.pdf

[1] <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

Annex – swifts and built development

Why are swifts important?

Swifts are a quintessential sign of British summertime and an intrinsic part of our towns and cities. They are often seen soaring over rooftops on late summer evenings, with their dark sickle-shaped wings and distinctive ‘screaming’ calls. These charismatic birds spend nearly their whole lives in flight and are migrant birds, arriving all the way from central/southern Africa in early May just to breed in the UK, before leaving again in August.

However, swifts are in trouble, having declined by 57% between 1995-2017. Swifts are now an ‘Amber-listed’ species on the list of Birds of Conservation Concern¹.

Without our help, swifts will be lost as a breeding species in the UK

Swifts are entirely reliant on buildings to nest. Nest sites are being lost when buildings are demolished or refurbished - and because swifts are faithful to their nest site, breeding success of swifts is being severely affected. New buildings lack suitable nest cavities, hence the importance of providing integral nest sites during their construction. The RSPB and the British Trust of Ornithology believe loss of nest sites is a key driver behind the dramatic decline of swifts.

If we do not take action now to save swifts, future generations will not hear the exhilarating sound of screaming parties of swifts soaring over rooftops on a summer evening. With their loss, a part of our heritage will be lost with them too.

All is not lost, however. There are lots of simple and inexpensive solutions, easily deployed in all manner of developments which address the issue - swift nest bricks being one such example.

A range of possible solutions, products and resources is listed below.

Swift bricks

Nest bricks do not require maintenance or cleaning out, as swifts build an insignificant nest. Swifts also do not foul around their nest site; therefore a build-up of waste on a development is not an issue with nest bricks, making swifts the ideal tenants.

Swift bricks last the lifetime of the building and do not detract from its appearance. There are various designs of nest bricks on the market, suited to blend with the exterior of a building, thus not affecting its appearance. There are catalogues (eg *Facts about Swift Bricks*) available with dimensions of a range of products suitable to accommodate different design scenarios and constraints.

In new residential developments, a minimum overall ratio of one cavity per dwelling should be provided and ideally 2-4 nest chambers should be provided per suitable house. For example, in a 30-house development only 10 houses will each have 3 nest bricks located on a suitable gable.

Proportionally more may be added to commercial units.

Swift bricks should be positioned approximately 0.5-1m apart, close to the eaves or barge boards of gable ends, away from doors and windows. They must be installed with at least 5m clearance above ground and with a similar clear flight path in front. Ensure trees will not impede flight lines, including any new landscaping that may do so when mature. Orientation is not critical as internal nest bricks

¹ www.rspb.org.uk/birds-and-wildlife/bird-and-wildlife-guides/bird-guide/status_explained.aspx

are better protected against extremes of temperature. Although it is advised to avoid shaded, cold northerly aspects and cold 'wind tunnels' between houses.

Swift nest boxes

Occasionally integral nest bricks may not be appropriate for the design of the building (invariably metal clad commercial buildings). However, there are a range of external swift nest boxes available as an alternative. It is worth bearing in mind, however, that external boxes tend to have a finite life.

Ideally external nest boxes must be installed under an overhang or under the eaves, to ensure some protection from weather and heat. However, nest boxes exposed to the sun need to be constructed of thick enough materials to prevent overheating and possibly painted white.

As with swift bricks, they should be sited at least 5m off the ground, with no obstacles in front of the box, which will disrupt the flight path of a swift trying to gain access to the box (such as trees), or lead predators into the box (such as cables, or climbing plants).

Swift attraction calls

Occupation of nest boxes can be speeded up if a recording of the attraction calls of swifts is played to prospecting birds. Recordings on CDs & MP3s are available to purchase from Swift Conservation and Action for Swifts.

References

Exeter City Council (2010) 'Residential Design Guide Supplementary Planning Document' Residential Design SPD chapters 9, 10 and Appendices. This is an exemplar of good practice guidance; Paragraph 9.28, page 58 and Appendix 2 are particularly relevant regarding integrating swift nest places into the fabric of buildings during construction.
<https://exeter.gov.uk/planning-services/planning-policy/supplementary-planning-documents/residential-design-guide-spd/>

Town and Country Planning Association (2004) 'Biodiversity by Design: A Guide for Sustainable Communities'.
<http://urbed.coop/sites/default/files/Biodiversity%2520by%2520design.pdf>

RIBA Publishing & Bat Conservation Trust (2013) 'Designing for Biodiversity: A technical guide for new and existing buildings', 2nd Edition.
<http://www.ribabookshops.com/item/designing-for-biodiversity-a-technical-guide-for-new-and-existing-buildings-2nd-edition/79859>

Action for Swifts 'Facts about Swift bricks'.
<https://actionforswifts.blogspot.com/p/swift-bricks.html>

RSPB swift nest box
<https://ww2.rspb.org.uk/get-involved/activities/give-nature-a-home-in-your-garden/garden-activities/createahighhomeforswifts/>

Swift Conservation - swift box designs & attraction calls.
<http://www.swift-conservation.org/Shopping!.htm>

Action for Swifts - swift box designs.
<http://actionforswifts.blogspot.co.uk/p/diy-swift-box-designs.html>

Action for Swifts - attraction call system.

<http://actionforswifts.blogspot.co.uk/p/attraction-call-systems-for-swifts.html>

Action for Swifts - Residential bird box guidance

<https://actionforswifts.blogspot.com/p/rbbg.html>

Action for Swifts - The attitudes of housing occupants to integral bird and bat boxes

<https://actionforswifts.blogspot.com/2018/06/the-attitudes-of-housing-occupants-to.html>

Day, J., Mayer, E. and Newell, D. (2019). The Swift – A Bird You Need to Help! *In Practice - Bulletin of the Chartered Institute of Ecology and Environmental Management*, 104: 38-42.

<https://actionforswifts.blogspot.com/p/rbbg.html>