Please amend paragraph 8.12 to include:

'Integrated swift nesting bricks'

To follow guidance in Merton's Draft Local Plan (2021), NPPG (2019) National Environment paragraph 023, and the Publication London Plan (2020) policy G6 (as referred to below), the following text would be included:

'Suitably located integrated universal swift nest bricks should be included in new builds at eaves level, (minimum height of five metres). Superior to external swift boxes, integrated swift bricks are permanent, more temperature-stable and maintenance-free. They benefit many bird species in addition to swifts. For smaller projects, interior swift soffit boxes are simple to fit. Specialist guidance on installation should always be followed. Any existing swifts' nests should be protected from destruction, and roof work should be avoided during the swift breeding season.'

(See attached leaflet and images, courtesy of Action for Swifts)

To Future Merton re the draft Small Sites Toolkit

Comment:

Guidance Note 8.1.....Does your project promote biodiversity?

Opportunities for small-scale constructions and developments to promote biodiversity:

<u>Figure 8.33</u> suggests that biodiversity can be promoted through the inclusion of bat boxes on the side of new buildings. This section fails to mention that similarly, simple additions can benefit populations of threatened birds, and **this requirement should be included**, as per suggested text above. The inclusion of suitably located swift bricks should be required in all new buildings above five metres in height (see sources of specialist guidance below).

Additionally, whilst showing a bat box in figure 8.33 is welcome, it is a missed opportunity because a timber external box is a very familiar product; it is high maintenance and has a short lifetime. Therefore, we request that you include an image of an integrated swift brick (images attached), which is unfamiliar to most, low maintenance, durable and aesthetically integrated with the building design.

Further information:

https://cieem.net/resource/the-swift-a-bird-you-need-to-help/

<u>Swift Conservation national organisation:</u> <u>https://swift-conservation.org/</u>

Action for Swifts

Justification:

Swifts qualify for 'endangered' status on the on the BTO's species list of conservation concern, indicating 'a need for urgent conservation action'. UK swift numbers declined by 53% between 1995 and 2016, a major reason being the loss of natural swift nesting habitat, consisting of small cavities in the eaves and walls of older buildings, lost through renovation and demolition. Modern buildings are heavily insulated and lack the accessible spaces swifts need for breeding. Swifts are nest-faithful year on year, and they cannot readily adapt to the loss of their existing nest sites.

Swift bricks benefit other smaller birds, such as house sparrows and members of the tit-family, all of which take readily to artificial swift nest sites. Integrated swift bricks have the advantage of lasting for the duration of the building structure itself and require no maintenance. External swift

boxes offer an alternative to swift bricks where the latter are not an option. Swifts nest in colonies and swift bricks/boxes should be installed in groups.

Policy:

<u>Merton's Draft Local Plan 2021</u> states that development should contribute to net gains in biodiversity. The policy expresses the requirement for new buildings to utilise their potential to support threatened species, such as swifts, through the incorporation of artificial nest boxes or bricks, to provide nesting and roosting opportunities. (Section 10, Policy 08.3, and paragraph 1.1.42)

National Planning Policy Framework 2019

Section 15, Clauses 170 (d)and174 (b)

https://www.gov.uk/government/publications/national-planning-policy-framework--2

National Planning Policy Guidance:

https://www.gov.uk/guidance/natural-environment

Paragraph: 023 Reference ID: 8-023-20190721:

<u>The Government's Building Better Building Beautiful Commission report 'Living With Beauty'</u> (30/01/20, Policy Proposition 33, page 110) Recommends:' <u>Bricks for bees and birds in new build homes</u>'.

https://www.gov.uk/government/publications/living-with-beauty-report-of-the-building-better-building-beautiful-commission

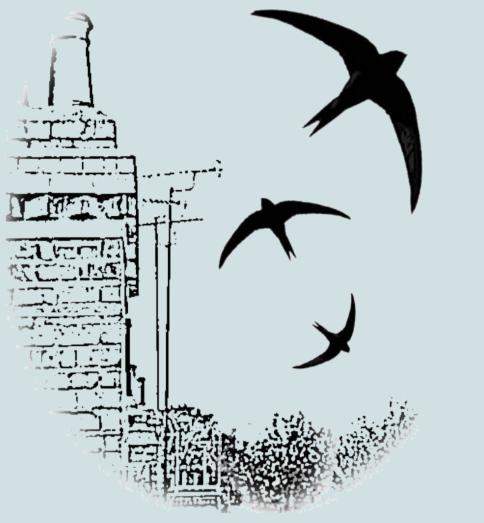
The Mayor of London's **Publication London Plan**, December 2020, advises local authorities as follows:

Policy G6 Biodiversity and Access to Nature:

B: Boroughs, in developing Development Plans, should: ...

(4) 'Seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context'(page 362).

Representing Wimbledon Swift Group



Swifts Need Help!

Action for Swifts Swift Conservation Swifts Local Network

Swifts are remarkable birds

They spend almost their whole lives in the air They eat,drink, sleep and mate on the wing They come to Europe each summer They return to Africa at the end of July a round trip of 14,000 miles!

Similar birds

Unlike Swallows and Martins,



Swifts have dark underparts and they never perch on wires Swift nests are always out of sight



© Tom LIndroos



© Ove Claesson



Swifts nest in old buildings

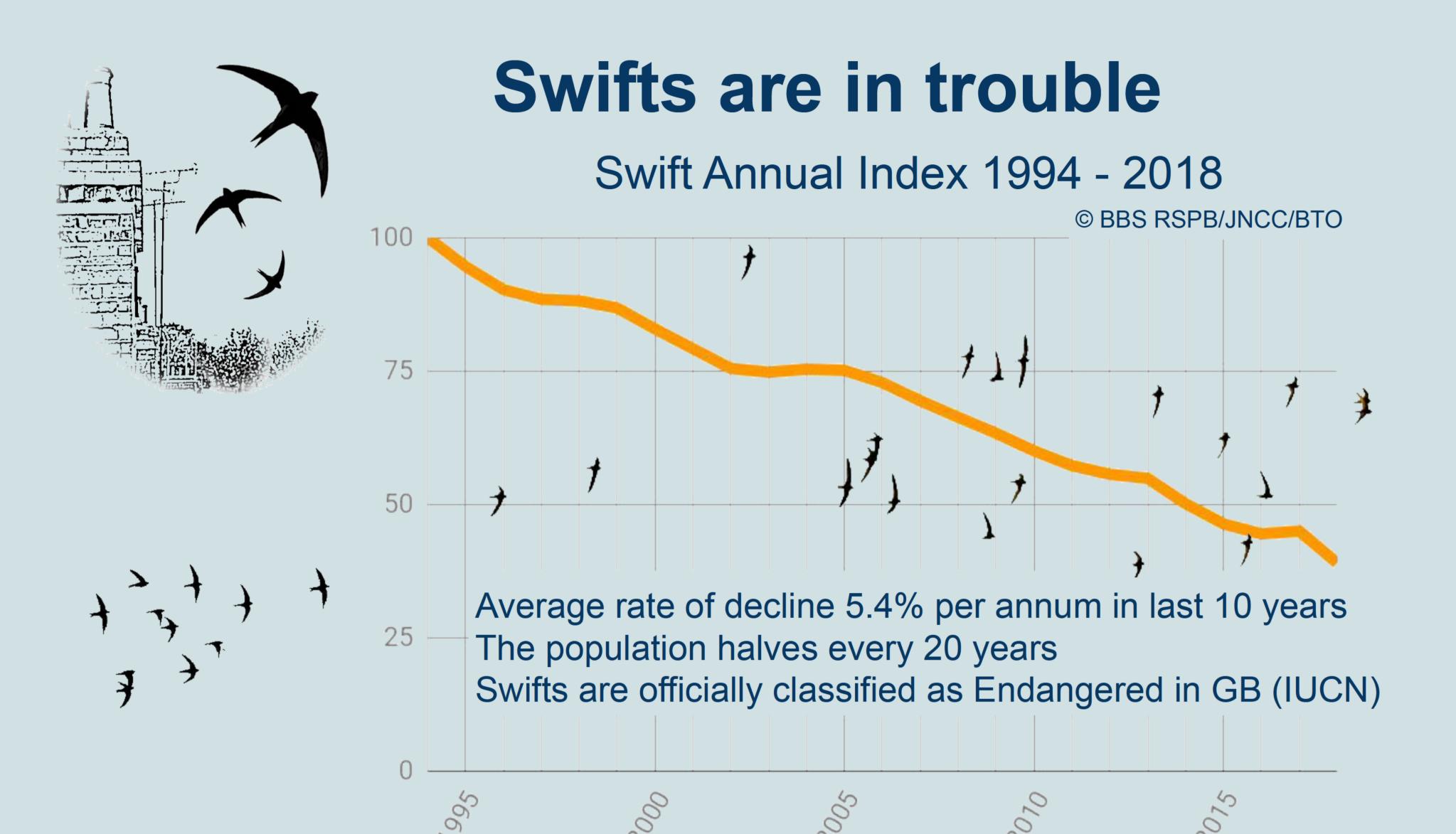
They are faithful to their nest sites Old buildings are knocked down, repaired or insulated. New buildings have no nooks or crannies, so when Swifts arrive back from Africa they find their nesting places have gone:



Swift migration These tracks are from a

geolocator attached to a Swift nesting in, Cambridgeshire in 2011.

The Swift returned in 2012 safe and sound.



WHAT CAN BE DONE?

Leave existing nest sites undisturbed Put up nest boxes

At least 4 metres high, higher is better Defended from sun and rain, with a clear flyway Swift attraction calls increase your chances

SWIFT NEST BOXES IN CHURCH BELFRIES

Both of these churches in Suffolk and Cambs host substantial colonies



Model of typical belfry boxes





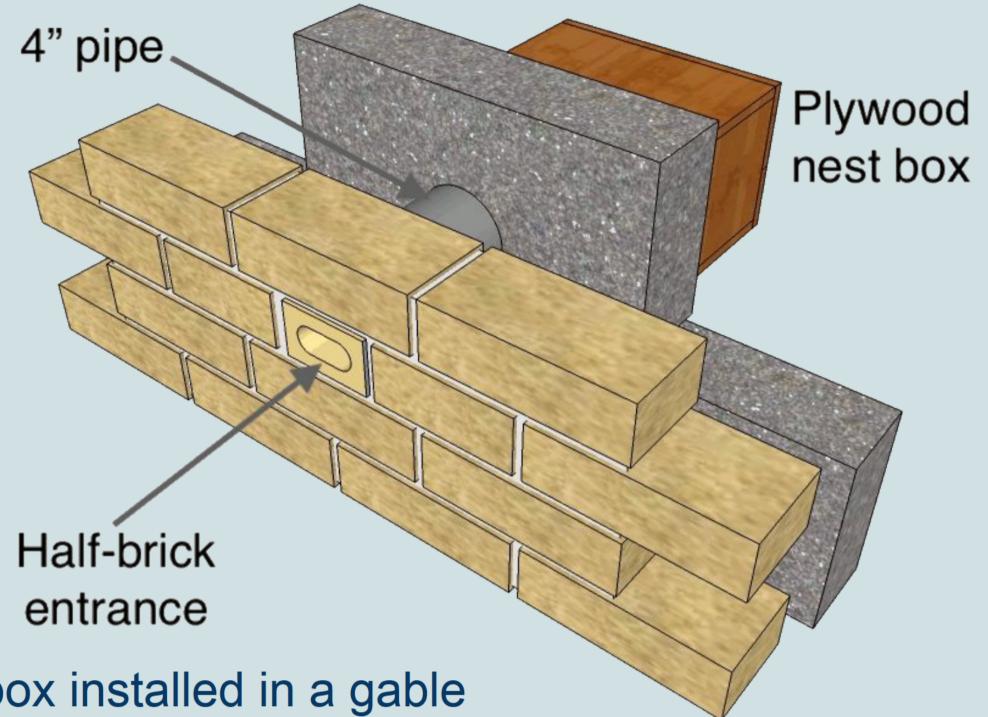
For guidelines see: actionforswifts.com/p/belfry.html



INTERNAL NEST BOXES: secure, thermally stable, easily installed

in new build, and can be retrofitted



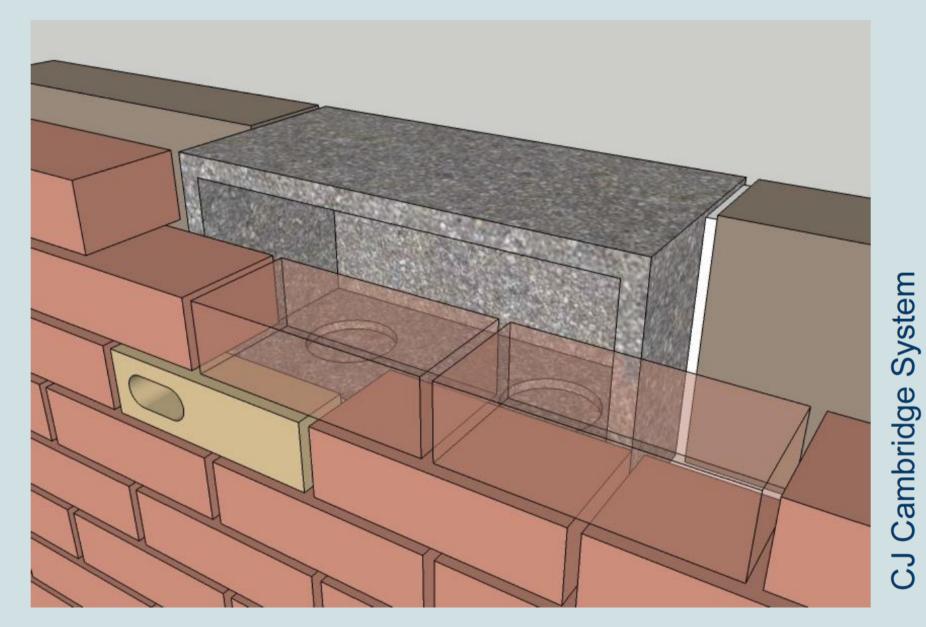


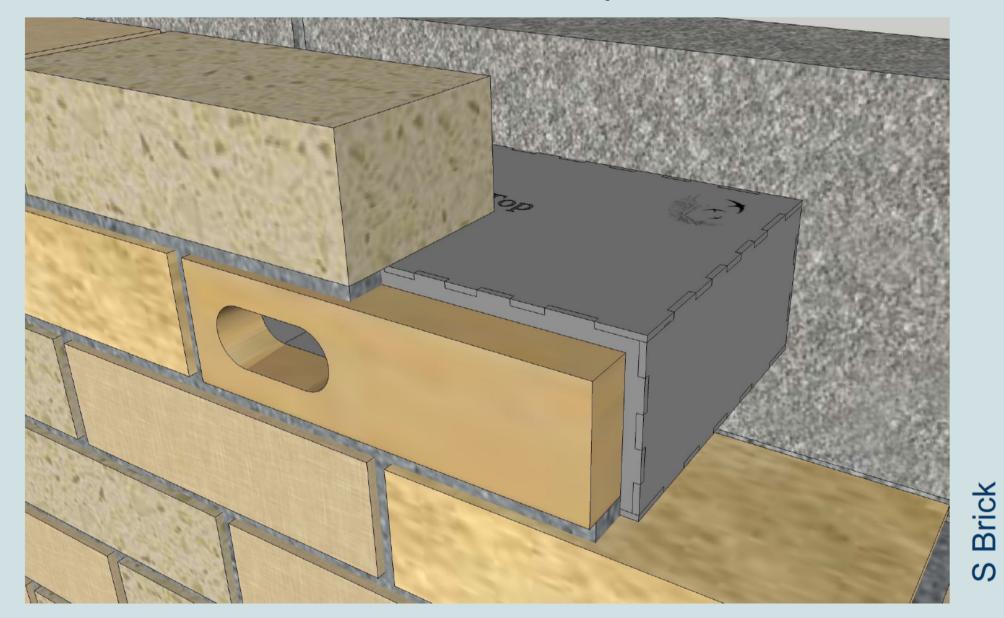
© Judith Wakelam



Cambridge System nest box installed in a gable

SWIFT BRICKS: available from a number of manufacturers. Easy in new build. See actionforswifts.com/p/swift-bricks.html





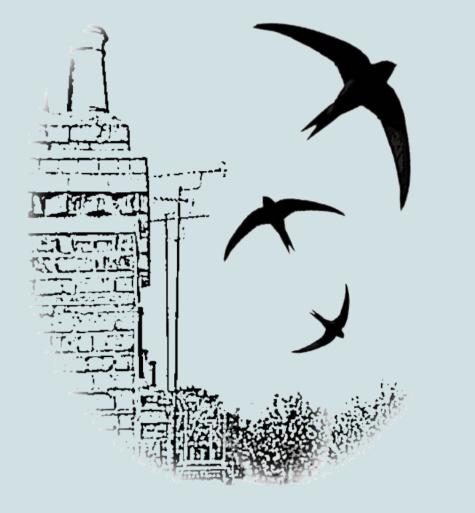
EXTERNAL NEST BOXES: Many commercial products. See: swift-conservation.org/Shopping!.htm For DIY designs: actionforswifts.com/p/diy.html



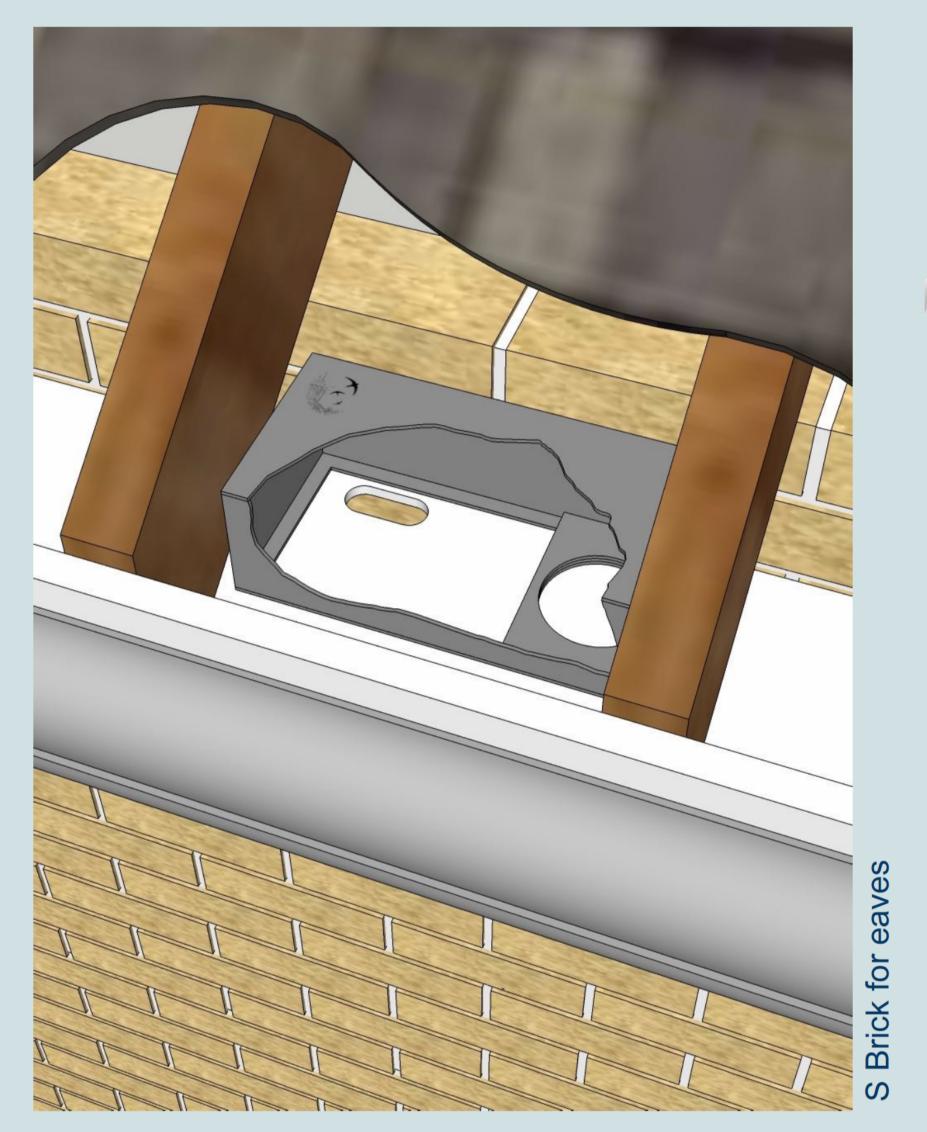
A simple DIY under eaves nest box



Model 30 - suitable for exposed positions



Nest box inside closed eaves





If you find a grounded Swift

and it cannot fly, put it in a closed, ventilated box. Swifts are difficult to care for, so get in touch with a specialist in the field. For links to comprehensive advice:

Tailored triangle box with 9 chambers



Need More Help? Free advice is available from: Action for Swifts



E-Mail: actionforswifts@gmail.com Website: actionforswifts.com

Swift Conservation

E-Mail: mail@swift-conservation.org Website: swift-conservation.org Bristol Swifts

Website: bristolswifts.co.uk

RSPB

Website: RSPB.org.uk/helpswifts Swifts Local Network (SLN) Link: actionforswifts.com/p/sln.html Oudith Wakelam

