

Comments for Planning Application 6/2022/1106/FULL, 1 Longcroft Green Welwyn Garden City, AL8 6EP

██████████ 12 Gilders, Sawbridgeworth, Hertfordshire, CM21 0EF

This site is suitable for the inclusion of integrated Swift bricks within the walls of the new development. Please do not make a condition to comply with the recommendations of Ecological Appraisal for the reasons set out below

Paragraph 186(d) of the NPPF states: “opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate”

Swift bricks conform to the British Standard for integrated nest boxes, BS42021:2022, and in doing so provide nest cavities for a number of birds including four red-listed species of conservation concern: Swift, House Martin, House Sparrow and Starling

The Ecological Appraisal recognises the importance of Swift bricks as it suggests their inclusion, however the recommendations are at best vague and do not appear to be tailored to this development. The report does not appear to provide the certainty that is expected to be provided to the decision maker as expected by the CIEEM, see para 5.26 here: [Ecological-Report-Writing-Dec2017.pdf \(cieem.net\)](#)

There is no firm commitment to their inclusion, as it indicates that they will be included “where possible”. It also recommends grouping Swift bricks on gable ends, which is normally a good practice but overlooks the fact that this development is primarily a block of flats. It also fails to specify the number of Swift bricks that will be provided.

In the circumstances of the vagueness of the Ecological Appraisal and the scale of the development, please consider securing a minimum of 6 Swift bricks by way of a condition, the wording of which has previously been used by the LPA:

“No development shall take place until written details are approved by the LPA of the model and location of a minimum of 6 integrated Swift bricks, to be fully installed prior to occupation and retained thereafter”, in accordance with the NPPF