

[REDACTED]

From: Stephen Fitt <[REDACTED]>
Sent: 31 January 2024 16:01
To: Development Control
Cc: Helene Jessop
Subject: Location: 24/00045/MOUT be Land at Tidcombe Hall, Tidcombe Lane e Lane Tiverton
Attachments: Universal nest brick 0122 & Planning (16) (1) (3) (2).pdf

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Outline for the erection of up to 100 dwellings to include the conversion of Tidcombe Hall and outbuildings, provision of community growing area, public open space, associated infrastructure, ancillary works and access with all other matters reserved:

Dear MidDevon planning Team thank you for asking te RSPB to comment on the above, we note that;

Para 4.1.12 of the retained Ecologist's Ecological Impact Assessment recommends;

A minimum of 30 Schwegler Type 1A swift boxes (or similar approved) would be incorporated into new buildings within the Site. These would be suitable for use by swift, which is an 'Amber' species of conservation concern, and can also be used by other declining urban species such as house sparrow, which is a 'Red' Priority Species. Boxes would be integrated into the walls of new buildings at a minimum height of 4m, ideally under the eaves or a gable end; the locations of boxes would be detailed in the CekoMP and relevant construction drawings. Mitigation, compensation and enhancement Ecological Impact Assessment – Tidcombe Hall, Tiverton 30 2301129_P893_EcIA_Final01: November 2023 4.1.13 A further ten Schwegler 1B nest boxes and ten Schwegler 2H nest boxes (or similar approved) would be installed on retained trees throughout the Site, including within the retained woodland. Approximate locations of boxes on trees would be detailed in the CekoMP; precise locations would be determined onsite by the EcoW during construction. Hazel dormouse 4.1.14 Protection of retained hedgerows and broadleaved woodland will be maintained throughout

We agree with the recommendations to provide accommodation for crevice roosting bats, creating access routes for hedgehogs and would also support "bee bricks" for solitary bee species.

However we strongly disagree with the recommendations relating to bird boxes.

The **British Standard for integral nest boxes BS42021:20 published last year** makes a number of recommendations

8.4.1 Residential buildings to provide new and enhanced opportunities for nesting birds, 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. NOTE 1 In practice this means that some dwellings could receive more than one box while others might contain none as some locations on a development are much more suitable than others, i.e. closer to green infrastructure. This might mean for a development of 30 houses, some might have more than one box and others none. NOTE 2 Some schemes could include a combination of internal and external nest boxes. The installation of external nest boxes is out of scope of this British Standard, however, where external nest boxes are included as part of the development plan they should also be included on the installation plan. Examples of species that might breed in external nest boxes in a built environment include the little owl, tawny owl, barn owl, kestrel, peregrine, starling, stock dove, jackdaw, black redstart, pied wagtail, spotted flycatcher, robin, wren, tree sparrow, swallow and house martin.

NOTE 3 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.

The most recent "Red List" includes house sparrows, house martins, starlings and swifts all use Universal Bird Bricks see attached*, need little or no maintenance and are far more likely to remain in situ for the life time of the development than any attached to trees.

*recent monitoring (see pics) results show up to 50% of the boxes installed being occupied by the first three species referred to with assorted "others" using them as well.

Section 9.2 of BS42021:2022 stipulates that

Integral nest boxes—installation plan Details for the selection, siting, positioning and installation of integral nest boxes shall be prepared and submitted to the local planning authority, to include:

- a) the total number of integral nest boxes to be installed on site;*
- b) a list of recommended integral nest boxes selected for installation, i.e. manufacturer(s) and model(s) along with illustrations, where available;*
- c) a site plan at an appropriate scale showing the location of specific buildings in the development into which boxes are to be installed;*
- d) building elevations showing the position on each building on site where boxes are to be installed;*
- e) details of materials, methods and workmanship necessary to install each box, taking into account relevant building regulations (such as Approved Document 7 [5]); and*
- f) a drawing showing the relationship between green infrastructure and the locations where integral nest boxes are to be installed, illustrating access to suitable, natural resources for birds including food, water and nesting materials in nearby habitats.*
- g) The entrance holes shall be minimum of 30 X 65mm" to accommodate all the species expected to use "Universal Boxes" (see attached).*

We recommend that the above are made a condition if the consent is granted.

Best wishes

Stephen Fitt,

RSPB, Exeter Office.

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