

Swift bricks - FAQ

27 Oct 2025

This briefing is on behalf of nature and animal welfare coalition Wildlife and Countryside Link ([Link](#)) for Peers.

Executive summary:

Mandating the inclusion of *swift bricks* in new homes through Building Regulations is a simple, low-cost, and common-sense measure that delivers tangible benefits for nature without burdening developers. Swift bricks are already proven, unobtrusive, and widely available.

This change would directly support the UK's legal commitments under the **Environment Act 2021** to halt the decline in species abundance by 2030, complementing existing biodiversity-net-gain measures. It is a straightforward way for every new home to contribute to national nature-recovery goals.

Building Regulations are the **appropriate and robust mechanism** for securing such measures. They already govern fabric-based features that advance wider public policy objectives—such as energy efficiency, accessibility, and climate-change mitigation—and provide consistent national enforcement through the building control system. By contrast, relying on **planning policy** alone has proven inconsistent, weakly enforced, and prone to challenge or dilution. Even well-intentioned local policies deliver patchily and depend on political will and resources. In contrast, Building Regulations ensure universal compliance through a well-established inspection and certification regime. Far from being a regulatory overreach, extending Building Regulations to include swift bricks mirrors the successful integration of energy and accessibility standards under Parts L and M, which likewise pursue wider public-good objectives.

This proposal represents a **practical, symbolic, and scientifically grounded “win-win”** for development and nature. It is simple to action through targeted changes and enforce, and would not represent a ‘regulatory burden’. It ensures consistent national delivery, costs little, and visibly demonstrates that new homes can contribute positively to biodiversity recovery.

Including swift bricks in Building Regulations is an **appropriate, proportionate, and common-sense reform**, a small design change with a strong, robust case in its favour.

We urge Peers to support Amendment 245 to mandate swift bricks.

Introduction:

“Swift bricks” are hollow bricks or specially-designed cavity units incorporated into the walls of buildings, providing nesting sites for cavity-nesting birds. Over recent decades, such species have suffered significant declines in Britain as modern construction methods have removed access to traditional roof voids, eaves and gaps. Swifts have declined by 68% from 1995 to 2023.¹ Local authorities such as Brighton & Hove City Council already require them via planning conditions.

Given the UK’s legal commitments under the Environment Act 2021 to halt decline in species abundance by 2030, and statements the Planning Bill will be a ‘win-win’ for nature and development, new homes should contribute to habitat creation and species protection. **Amendment 245** seeks to make swift bricks a universal requirement in new homes (or at least in new brick-built walls) via Building Regulations, rather than left entirely to planning discretion.

Mandating swift bricks in this manner would be wholly appropriate, and a simple, but effective, step to substantiate the stated intention for the Bill to deliver a ‘win-win’ for nature and development. The following briefing addresses common misconceptions about the introduction of such measures, and reinforces the robust, commons-sense case for their introduction.

1. “Building Regulations are not an appropriate place for swift bricks; they should (and can) be better dealt with in planning policy

Rebuttal:

While planning policies and mechanisms have been used to secure swift bricks (e.g., Brighton & Hove Guidance Note for provision of swift boxes/bricks in new development), planning policy is fundamentally *not as suitable or robust* as Building Regulations for securing such technical, building fabric requirements consistently for several reasons.

- Planning conditions and policy are more prone to being challenged, varied or ignored. Planning obligations often rely on discretionary decision-making and subjective interpretation by planning officers or committees, leading to inconsistent application across local authorities. Developers can appeal conditions as “unreasonable” or negotiate them away during viability discussions or Section 106 renegotiations. Even when policies exist, they may be outweighed by other material considerations, such as housing supply targets or economic benefits, resulting in ecological or technical requirements being diluted or dropped. Moreover, planning conditions are typically enforced only reactively, requiring resource-intensive monitoring and evidence collection, which many LPAs lack the capacity to sustain.
- Enforcement and delivery of ecological enhancements via planning permissions is weak. Government planning practice guidance, while encouraging biodiversity features, remains

¹ <https://www.bto.org/learn/about-birds/birdfacts/swift>

advisory and lacks statutory force. Local planning authorities already face resource pressures, acknowledged by Government through the £46 million recruitment package for 300 planners, and cannot ensure consistent delivery. For instance, the report by Wild Justice (“Lost Nature”) found that only about 53% of ecological features required by planning conditions in new housing developments were actually delivered including 75% of bird boxes.²

- Even the most strongly worded planning policies routinely fail to protect the environment in practice. Green Belt protections, for example, are frequently overridden under pressure to meet housing targets, despite their supposed strength. Similarly, developments continue to be approved in flood-risk areas despite clear planning policy to the contrary, often relying on technical justifications or promises of mitigation.
- Local swift brick requirements in councils like Brighton or Hackney are laudable but patchy, and depend heavily on local political leadership and enforcement capacity. In contrast, regulations provide a greater guarantee of implementation across all areas, regardless of local variation in planning expertise or will.

Building Regulations offer a more consistent, enforceable, national mechanism: they apply to all works, have clearer compliance paths, are less subject to local variation or planning appeals, and are supported by building control regimes. Building Regulations, enforced by approved inspectors and local authority building control, provide the certainty and universality that planning cannot. This ensures that biodiversity measures are not treated as optional extras or traded away in viability negotiations. Therefore, including swift bricks (or at least specifying a minimum requirement) via Building Regulations (or via a regulation-making power) would provide a stronger, more reliable route than leaving it to planning policy alone.

2. “Building Regulations are focused on health and safety, not wider social goods.”

Rebuttal:

It is not correct to say that Building Regulations only cover narrow health-and-safety issues. They also already address **wider public policy and legal environmental objectives** beyond immediate occupant safety, such as tackling climate change.

For example, Part L of the Building Regulations in England and Wales (Conservation of Fuel and Power) addresses the energy use and carbon emissions of buildings, in order to contribute to the UK’s obligations under the Climate Change Act 2008. A wider public-policy objective related to climate change, not occupant health. Part L includes target CO₂ emission rates [in kgCO₂ /m² per year] and target primary energy rate, in kWhPE/m² per year, influenced by the fabric and fuel.³

² <https://wildjustice.org.uk/general/lost-nature-report/>

³ https://assets.publishing.service.gov.uk/media/662a2e3e55e1582b6ca7e592/Approved_Document_L_Conservation_of_fuel_and_power_Volume_1_Dwellings_2021_edition_incorporating_2023_amendments.pdf

The Environment Act 2021 imposes a *legal duty* on Government to halt the decline in species abundance by 2030. Achieving that duty requires embedding biodiversity gain across all development routes, not only through planning discretion. Building Regulations already deliver on parallel statutory duties under the Climate Change Act 2008. The analogy is clear: just as Part L uses Building Regulations to require features that help meet climate-change targets, Building Regulations could legitimately require features (such as swift bricks) that help meet biodiversity and nature-recovery target. It would also be much simpler in than the modelling required to meet existing climate emission provisions, and could mirror the simple list of features approach already in Part O for overheating, signposting to shutters and awnings.

Swift bricks meet the same public-policy threshold as climate, as the UK is legally committed (via the Environment Act 2021) to halt the decline in species abundance by 2030, and international commitments such as 30by30 and Kunming-Montreal Global Biodiversity Framework, as signatories to the UN Convention on Biological Diversity (CBD)

In short, Building Regulations are very much an appropriate vehicle for delivering fabric-based biodiversity enhancements; particularly, as is the case here, where the public policy rationale is clear and the technology can be standardised and cost-effective.

3. “Mandating swift bricks would add unreasonable costs to development.”

Rebuttal:

The cost of a swift brick is modest: approximately £30 each (or in that ball-park).

With economies of scale and mass ordering (as happens with many building technologies in large volume house-building), the unit cost would be expected to fall further. Indeed, volume house-builders routinely install other, more costly “domestic items” (such as baths, sanitaryware, kitchens) at scale, with reduced batch-order price points. With swift bricks, such costs would be very modest in the context of a new home.

A number of major volume-builders have already signed up to the voluntary “Homes for Nature” commitment (covering ~100,000 homes per year) which includes a bird-nesting brick or box for every new home, plus hedgehog highways, from 1 September 2024. This indicates that the industry accepts the feasibility and likely low cost of embedding such biodiversity technologies at scale. Mandating swift bricks via legislation or regulation simply builds on this stated support, and ensures a level-playing field, bringing the industry up to the same standards, with all developers subject to same requirement and removes competitive disadvantage (where some developers might avoid or ignore voluntary measures).

Voluntary commitments alone are insufficient: as the Wild Justice “Lost Nature” report shows, voluntary/ecological enhancements secured via planning conditions **are often not delivered** (e.g., 75%

of bird and bat boxes absent).⁴ The evidence clearly shows stronger requirements are needed, not just voluntary promises.

Local policy examples show that swift-brick requirements are feasible without damage to house-building rates. For example, Brighton & Hove's requirement (for new build developments above 5 m height) stipulates swift bricks or boxes and yet there is no obvious evidence that house-building has been deterred.

In short, the cost burden is very small relative to overall development cost; the measure is feasible at scale; nor does evidence suggest that such a requirement will materially impede housing delivery.

4. "Building Regulations would be too slow a mechanism to implement changes quickly."

Rebuttal:

While major overhauls of Building Regulations can indeed take time, there is precedent for relatively rapid implementation of targeted changes when the policy intent is clear. For example:

- In response to the COVID-19 pandemic, building control procedures and temporary use provisions were changed within weeks in 2020, to keep construction activity going safely.⁵
- Amendments to Approved Document B (fire safety) regarding sprinklers in high-rise buildings were consulted on in late 2019 and implemented by May 2020—only six months later. (See industry evidence)⁶
- Minor updates, such as clarifications in Approved Documents or adjustments to guidance notes, have often been issued within three to six months.

In addition, national planning policy consultations and subsequent local plan updates can take several years to translate into enforceable requirements. By contrast, a regulation-making power under Building Regulations can deliver results within months once policy intent is established, precisely as was achieved for post-Grenfell fire-safety measures. Given the ongoing rapid decline in swifts, delay of several years would significantly undermine recovery prospects.

For a requirement like swift bricks, which is straightforward, low-cost, with available products, and limited technical complexity, the regulatory change process could be more streamlined. A regulation-

⁴ <https://wildjustice.org.uk/general/lost-nature-report/>

⁵ <https://www.gov.uk/guidance/application-of-the-building-regulations-during-the-coronavirus-covid-19-outbreak> ; <https://www.lexology.com/library/detail.aspx?g=0adb3229-2c05-4104-b765-d00ecf5e83e5&> ; <https://publications.parliament.uk/pa/ld5801/ldselect/ldsecleg/49/4906.htm>

⁶ <https://www.hbf.co.uk/documents/10459/KIRWAN-Frances.pdf>

making power in the Bill could allow for a relatively speedy timetable, tied to ministerial or departmental commitment.

Given the national biodiversity targets and the urgency around nature-recovery, there is strong justification for using the building-regulation pathway with an expedited timetable rather than relying on slower, uneven planning policy changes. The claim that Building Regulations changes are inherently too slow is not borne out by recent precedent and should not be a barrier to their use in this instance.

5. “Building Regulations do not mandate specific technologies/fabric interventions of this sort.”

Rebuttal

It is correct that Building Regulations often specify performance outcomes rather than product types. But it is not true that they never mandate – or signpost clearly to a common default option, using examples - specific products or technologies. Where there is a widely accepted, standard solution, and a clear public-policy objective, Building Regulations already do refer to, highlight, and require specific technologies; they reference British Standards; they specify product types; they mandate certain solution types.

Examples:

- Part G (Sanitation, Hot Water Safety and Water Efficiency) requires the use of Thermostatic Mixing Valves (TMVs) to limit hot-water outlet temperatures (e.g., to prevent scalding). The acceptability of in-line blending valves can be demonstrated by compliance with the relevant European Standard such as BS EN 1111:1999 Sanitary tapware, thermostatic mixing valves (PN 10), general technical specification or BS EN 1287:1999 sanitary tapware, Low pressure thermostatic mixing valves general technical specifications. This is inherently a product-type/ based requirement.⁷
- Part L (Conservation of Fuel and Power): The notional building specifications used in SAP (Standard Assessment Procedure) models often explicitly assume technologies such as condensing boilers and low-energy lighting. Appendix R of SAP 10.2 refers to “default values” based on specific product types, including mechanical ventilation with heat recovery (MVHR).⁸
- Part M (Access to and Use of Buildings) mandates specific gradients for ramps, visual contrast for ironmongery, minimum clear door widths etc. These are design/fabric features, not purely performance outputs.⁹

⁷https://assets.publishing.service.gov.uk/media/66f6c6ce3b919067bb4828cc/ADG_with_2024_amendments.pdf

⁸ <https://www.gov.uk/government/publications/conservation-of-fuel-and-power-approved-document-l>

⁹https://assets.publishing.service.gov.uk/media/5a7f8a82ed915d74e622b17b/BR_PDF_AD_M1_2015_with_2_016_amendments_V3.pdf

- Approved Document O (Overheating mitigation) includes specific, listed features such as awnings, shutters, blinds, opening window areas at specified minimum sizes and positions, glazing ratios etc, effectively prescribing certain building-elements.¹⁰
- Under *Approved Document F (2021)*, mechanical extract ventilation is explicitly required in kitchens. This includes specific references to **cooker hoods** or extract systems that must: Extract at a minimum rate of 30 L/s (if placed above the hob) or 60 L/s (if elsewhere), and be ducted to the **external air**, not merely filtered or recirculated internally.¹¹
- Also, Building Regulations regularly reference British Standards or product standards (e.g., BS EN, BS 8300) to ensure consistency and enforceability. The requirement for a swift brick could be introduced as a specification referencing a British Standard (or equivalent) for cavity-nesting bricks/boxes.

Regulations can include tiered requirements, compliance options, exemptions, or context-sensitive rules, such as allowing alternatives where bricks are unsuitable, ensuring proportionality while maintaining universality. Building Regulations already contain mechanisms for flexibility and context-specific application, undermining the argument that they are too rigid to accommodate swift bricks. For example, provisions in Part M (accessibility) and Part B (fire safety) allow for alternative solutions where strict compliance isn't appropriate, as long as equivalent outcomes are achieved. Likewise, Part O, (overheating), highlights a range of relevant, but specific, compliance technologies/ interventions.

This performance-based approach means that regulations can mandate swift bricks in principle, while still allowing for exemptions or alternative designs where specifically justified. This flexibility ensures both benefits and design appropriateness can be achieved without compromising regulatory integrity. Building Regulations are particularly well-suited for requiring swift bricks because these features are integral to the fabric of a building, just like air bricks, cavity trays, or ventilation ducts, which are already routinely specified in the regulations.

The Government notes that Building Regulations are “highly technical and complex.” However, they already include reference to simple, standardised approaches or features, including fabric-integrated units such as air bricks. Building Regulations also handle far more complex technical requirements—ventilation, thermal performance, moisture resistance—without difficulty. The same system can easily accommodate a specification referencing the British Standard for nest bricks. Swift bricks would impose **no significant additional administrative load** on building control bodies. Compliance is a simple visual check at completion stage, far simpler than verifying airtightness or SAP calculations. Integrating this requirement into standard inspection checklists would have negligible impact on inspector workloads while delivering measurable biodiversity benefits.

¹⁰ <https://assets.publishing.service.gov.uk/media/6218c5aad3bf7f4f0b29b624/ADO.pdf> ;

¹¹ <https://www.gov.uk/government/publications/ventilation-approved-document-f>

Swift bricks are small, unobtrusive hollow bricks installed during construction, with no moving parts or complex maintenance requirements. Their design and installation are consistent with other passive design features already covered under Approved Documents, such as in Part O on overheating, making them straightforward to integrate into construction standards. Like other ventilation or access provisions (e.g., air bricks for underfloor airflow), they serve a specific environmental function without interfering with the building's structural integrity or usability. Including swift bricks in Building Regulations would simply extend the same logic already applied to other embedded environmental design features, ensuring their consistent provision across developments without the uncertainty and variation of planning policy interpretation.

Air bricks (ventilation bricks) are widely required in building constructions (particularly older houses) to provide sub-floor ventilation and avoid damp. The **swift-brick requirement is directly analogous** - a brick with holes in it integrated into the wall - providing nesting voids rather than only ventilation. The construction/material impact is minimal, and risks of damp or pest issues are well-understood and manageable (when installed to best practice, as local authorities already set out in guidance).

The claim that Building Regulations cannot effectively require, or signpost to, a specific technology is not correct. They already do so. Accordingly, including a requirement for swift bricks is consistent with existing regulatory precedent.

Concerns about “overlapping policies” or “diluting the purpose” of Building Regulations are misplaced. Likewise worries about excessive, unwieldy requests to integrate other biodiversity features. The system already accommodates multiple objectives, safety, accessibility, energy efficiency, water efficiency, emissions, without conflict. Biodiversity recovery is now a statutory national goal and should sit alongside these. Embedding simple features such as swift bricks, would be simple, appropriate and actionable, with existing parallels already in place in building regulations, such as air bricks, or specific solutions that are limited, and not excessive lists, such as Part O's stipulations for overheating.

Embedding nature recovery within the built environment aligns *precisely* with the stated Government ambition for the planning and building system, to deliver a “win-win” for nature and development.

6. “Having a provision of this sort on the face of the Bill is unnecessary/inappropriate.”

Rebuttal:

While it may be true that very detailed technical specifications should not always be included verbatim on the face of primary legislation, the Bill can—and often does—include enabling powers or a requirement in principle (e.g., “the Secretary of State may by regulation require new dwellings to incorporate features for biodiversity nesting voids”) which then allows the technical details to be set out in secondary legislation/Building Regulations or Approved Documents.

Including a provision on the face of the Bill (or an amendment thereto) sets the clear policy direction and statutory impetus: it signals parliamentary intent that swift bricks are mandatory, not optional. That is important in ensuring industry commitment, timely regulatory change, and avoiding the drift associated with purely discretionary or voluntary measures.

Given the national biodiversity emergency, and the risk that voluntary/ planning-condition approaches will continue to result in very low delivery (see the Lost Nature findings), a statutory signal is appropriate. The Bill offers the correct vehicle to provide the enabling framework and requirement.

In short: the Bill can sensibly include the policy requirement (or duty) while leaving technical implementation to Building Regulations/secondary standards. That ensures both legal clarity and appropriate regulatory flexibility.

7. “It’s not appropriate to add swift bricks to Building Regulations as there are certain circumstances where they might not be appropriate, e.g. near an airport.”

Rebuttal:

This argument misunderstands both the flexibility inherent in Building Regulations and the nature of swift bricks as a design measure. Building Regulations already allow for exemptions and context-specific alternatives where particular circumstances apply. For example:

- **Approved Document O** (Overheating Mitigation) permits a range of different compliance routes and options - depending on local noise, air-quality or security constraints, acknowledging for example, opening windows may not be appropriate in every context given security or safety risks.¹²
- **Part M** (Access) and **Part B** (Fire Safety) both use “performance-based” language that allows for *alternative solutions* where standard provisions cannot reasonably be applied, so long as equivalent outcomes are demonstrated.¹³
- Likewise, **Part F** (Ventilation) allows mechanical alternatives where natural ventilation is impracticable.¹⁴

A requirement for swift bricks could easily follow this model, with an exemption or substitution clause (for example, “except where demonstrably unsuitable due to operational air-safety restrictions, or where equivalent biodiversity features are provided elsewhere on site” similar to existing caveats in other sections).

¹² <https://assets.publishing.service.gov.uk/media/6218c5aad3bf7f4f0b29b624/ADO.pdf>

¹³ https://assets.publishing.service.gov.uk/media/5a7f8a82ed915d74e622b17b/BR_PDF_AD_M1_2015_with_2_016_amendments_V3.pdf ; <https://www.gov.uk/government/publications/fire-safety-approved-document-b>

¹⁴ <https://assets.publishing.service.gov.uk/media/61deba42d3bf7f054fcc243d/ADF1.pdf>

This approach maintains regulatory clarity and universality, while allowing legitimate site-specific exceptions to be justified through standard building-control processes. It would therefore be entirely consistent with established regulatory practice, enabling appropriate flexibility without undermining the overall policy aim or creating unnecessary complexity.

8. “Air bricks perform an essential function for buildings; swift bricks do not, so the analogy is false.”

Rebuttal:

While it is true that air bricks have a technical purpose linked to building ventilation, both are *small, fabric-based design features* built into walls to deliver wider public-interest outcomes.

Air bricks deliver building-performance outcomes (moisture control); swift bricks deliver *biodiversity-performance outcomes* — a legally recognised policy objective under the **Environment Act 2021**, which sets a duty to halt the decline in species abundance by 2030. Both therefore serve essential roles within their respective public-policy domains, with a strong, underpinning legal imperative for swift bricks give their specific, proven value in preventing species decline.

The inclusion of swift bricks directly supports the UK’s Environment Act targets by embedding species habitat provision into the built fabric, rather than relying on uncertain off-site measures. This resembles the role of Part L (Conservation of Fuel and Power), which mandates building-fabric interventions to deliver the UK’s climate-change targets under the Climate Change Act 2008. If reducing emissions is considered an essential function, justifying regulatory requirements from targets in legislation, then enabling species recovery through small-scale, standardised design interventions is equally legitimate.

Moreover, cavity-nesting birds such as swifts, house martins, and house sparrows have suffered severe population declines due to modern sealed construction. Swift bricks represent a simple, effective restoration of this lost ecological function delivering measurable biodiversity value from every new home. In this context, the provision of nesting habitat is *functionally essential* to meeting the UK’s statutory biodiversity commitments, just as air bricks are essential to meeting moisture-control standards.

Conclusion:

The inclusion of swift bricks is simple, effective, low-cost, scalable measure which helps the UK meet its legal and political commitments to species-recovery. Building Regulations provide a stronger, more enforceable and consistent mechanism than relying solely on planning policy, which suffers from variability, weak enforcement and poor delivery.

The precedent for Building Regulations mandating specific technologies (TMVs, ventilation systems, accessibility features) shows that there is no principled barrier to requiring swift bricks. Costs are

minuscule, and industry already accepts the concept at scale, meaning mandating them would level the playing field rather than penalise developers. If delivery of biodiversity enhancements is left only to planning policy or voluntary commitments, the risk of systemic non-delivery is high.

The Bill is the appropriate place to set the statutory requirement (or enabling power) so that Building Regulations can implement it promptly and consistently across all new housing.

We urge Peers to support Amendment 245 to mandate swift bricks.

Wildlife and Countryside Link (Link) is the largest nature coalition in England, bringing together 90 organisations to use their joint voice for the protection of the natural world and animals.

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