

# Coventry Local Plan Review

## Regulation 19

### Proposed Submission (Publication) Stage Representation Form

(guidance note below)

Ref:

(For official use only)

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Name of the Plan  
to which this  
representation  
relates:

**Coventry Local Plan Review – Regulation 19 Proposed  
Submission (Publication)**

**Please return to Coventry City Council in writing or electronically by 23:59 03 March 2025** email to [planningpolicy@coventry.gov.uk](mailto:planningpolicy@coventry.gov.uk), via our consultation portal <https://coventrycitycouncil.inconsult.uk/system/home> or by post to Planning Policy Team, PO Box 7097, Coventry, CV6 9SL

Please refer to the following data protection/privacy notice:  
[www.coventry.gov.uk/planningpolicyprivacynotice](http://www.coventry.gov.uk/planningpolicyprivacynotice)

Please also note that that a copy of your representation(s) will be made available to the Planning Inspectorate and to the person appointed by the Secretary of State to conduct the examination (i.e. the Inspector) and the Programme Officer. and that your representation(s) will be 'made available' in line with the Regulations (The Town and Country Planning (Local Planning) (England) Regulations 2012 – Regulations 20, 22 and 35). This includes publication on Coventry City Councils website (personal details will be redacted in line with the Privacy Notice).

This form has two parts:

**Part A** – Personal Details: need only be completed once.

**Part B** – Your representation(s).

**Please fill in a separate sheet for each representation you wish to make.**

## Part A

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### 1. Personal Details\*

### 2. Agent's Details (if applicable)

*\*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Title

Mr

First Name

Michael

Last Name

Priaulx

Job Title

Chair

(where relevant)

Organisation

Swifts Local Network:  
Swifts & Planning Group

(where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone Number

E-mail Address

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**Part B – Please use a separate sheet for each representation**

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Name or Organisation:

3. To which part of the Local Plan Review does this representation relate?

Paragraph  Policy GE3

4. Do you consider the Local Plan Review is:

(1) Legally compliant	<b>Yes</b>	<input type="text"/>	<input type="text"/>
(2) Sound		<input type="text"/>	<b>No</b>
(3) Complies with the Duty to co-operate	<b>Yes</b>	<input type="text"/>	<input type="text"/>

Please tick as appropriate.

5. Please give details of why you consider the Local Plan Review is not legally compliant or is unsound or fails to comply with the Duty to Co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan Review or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy GE3 is welcome but not currently sound nor effective nor consistent with national policy because sentence 1 (a) incorrectly suggests bird and bat boxes contribute to a 10% net gain of biodiversity (as calculated by the DEFRA BNG methodology), and does not mention swift bricks to be in line with the NPPG 2019 Natural Environment paragraph 023 which highlights the importance of swift bricks, nor NPPF December 2024 Paragraph 187 (d) (page 54) which states "planning policies should... incorporate features which support priority or threatened species such as swifts".

In more detail, swift bricks along with other species features are excluded from the DEFRA Biodiversity Net Gain metric so need a separate clear policy.

The National Model Design Code Part 2 Guidance Notes (2021) also recommends bird bricks (Integrating Habitats section on page 25, and Creating Habitats section on page 26).

Swift bricks are universal nest bricks for small bird species, e.g. see NHBC Foundation: Biodiversity in New Housing Developments (April 2021) Section 8.1 Nest sites for birds, page 42: [https://www.nhbcfoundation.org/wp-content/uploads/2021/05/S067-NF89-Biodiversity-in-new-housing-developments\\_FINAL.pdf](https://www.nhbcfoundation.org/wp-content/uploads/2021/05/S067-NF89-Biodiversity-in-new-housing-developments_FINAL.pdf) ), which are essential to save a variety of endangered red-listed urban **building**-dependent small bird species such as swifts and house sparrows.

Swift bricks are significantly more beneficial than external bird boxes as they are a permanent feature of the **building**, have zero maintenance requirements, are aesthetically integrated with the design of the **building**, and have improved thermal regulation with future climate change in mind.

Therefore, swift bricks should be included in all developments following best-practice guidance (which is available in BS 42021:2022 and from CIEEM (<https://cieem.net/resource/the-swift-a-bird-you-need-to-help/>)).

The UK Green **Building** Council (UKGBC) is a membership-led industry network and they have produced a document entitled: "The Nature Recovery & Climate Resilience Playbook" (Version 1.0, November 2022) <https://ukgbc.org/resources/the-nature-recovery-and-climate-resilience-playbook/> This document is designed to empower local authorities and planning officers to enhance climate resilience and better protect nature across their local area, and includes a recommendation (page 77) which reflects guidance throughout this document: "Recommendation: Local planning Authorities should introduce standard planning conditions and policies to deliver low cost/no regret biodiversity enhancement measures in new development as appropriate, such as bee bricks, swift boxes [and bricks] and hedgehog highways."

Many other Local Authorities are including detailed swift brick requirements in their Local Plan, such as Tower Hamlets Local Plan Regulation 19 stage (Policy B04 paragraph 18.72, <https://talk.towerhamlets.gov.uk/local-plan> ),

which follows the exemplary swift brick guidance implemented by Brighton & Hove since 2020,

and Wiltshire Local Plan Regulation 19 stage, which requires an enhanced number of 2 swift bricks per dwelling (policy 88: Biodiversity in the built environment, page 246 - "As a minimum, the following are required within new proposals: 1. integrate integral bird nest bricks (e.g., swift bricks) at a minimum of two per dwelling;" <https://www.wiltshire.gov.uk/article/8048/Current-consultation-Reg-19> ),

and Cotswold District Council are proposing three swift bricks per dwelling in their current Local Plan consultation (Policy EN8 item 6, and paragraph 0.8.4, <https://www.cotswold.gov.uk/planning-and-building/planning-policy/local-plan-update-and-supporting-information/> ),

so such an enhanced level should also be considered.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan Review legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the Duty to Co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please delete current Policy GE3 1(a) reference to bird and bat boxes and replace with a new clause to be effective and consistent with national policy:

Swift bricks are a universal nest brick for small bird species, and should be installed in new developments including extensions in accordance with best-practice guidance such as BS 42021 or CIEEM.

Swift bricks are a significantly better option than external boxes as they are a permanent feature of the building with no maintenance requirements, improved thermal regulation, and aesthetic integration with the design.

Also please add for the same reason: Existing nest sites for building-dependent species such as swifts and house martins should be protected, as these endangered red-listed species which are present but declining in Coventry return annually to traditional nest sites. Mitigation should be provided if these nest sites cannot be protected.

(Continue on a separate sheet /expand box if necessary)

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your

*suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

***After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.***

7. To which part of the Sustainability Appraisal (SA) report does this representation relate?

Paragraph

Please add any further comments relating to the SA report in the box below

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

**No**, I do not wish to participate in hearing session(s)

☐ Yes

**Yes**, I wish to participate in hearing session(s)

**Please note** that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

**To provide further information, if required.**

(Continue on a separate sheet /expand box if necessary)

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.