

Cannock Chase Council:  
Cannock Chase Local Plan  
Representation Form



Making a representation: We cannot accept anonymous representations. You must provide your contact details but only your name and comments will be published on the website. Your personal data will be held securely and processed in line with our privacy notice [www.cannockchasedc.gov.uk/privacynotices](http://www.cannockchasedc.gov.uk/privacynotices). Once the plan is submitted your comments will be shared with the Planning Inspectorate and an independent inspector will review representations. You have the right to withdraw your representation and your data will be destroyed. Data will only be held until adoption of the Cannock Chase Local Plan.

## Part B: Representation Form

Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s)**. We have also published a separate **Guidance Note** to explain the terms used and to assist in making effective representations.

### Part B: Representation

|                        |  |
|------------------------|--|
| Name and Organisation: | Michael Priaulx,<br>Swifts Local Network: Swifts & Planning Group. |
|------------------------|--|

#### Q1. To which document does this representation relate? (Please tick one box)

- Cannock Chase Local Plan 2018-2040
- Sustainability Appraisal of the Cannock Chase Local Plan 2018-2040
- Habitats Regulations Assessment of the Cannock Chase Local Plan 2018-2040

#### Q2. To which part of the document does this representation relate?

|                 |       |         |       |       |  |                  |  |
|-----------------|-------|---------|-------|-------|--|------------------|--|
| Para-<br>graph: | 6.278 | Policy: | SO7.1 | Site: |  | Policies<br>Map: |  |
|-----------------|-------|---------|-------|-------|--|------------------|--|

#### Q3. Do you consider the Cannock Chase Local Plan is:

- A. Legally compliant Yes:  No:
- B. Sound Yes:  No:
- C. Compliant with the Duty to Co-operate Yes:  No:
- (Please tick as appropriate).*

|                |                  |        |
|----------------|------------------|--------|
| For office use | Part B reference | B0106A |
|----------------|------------------|--------|

**Cannock Chase Council:  
Cannock Chase Local Plan  
Representation Form**



**Q4. Please give details of why you consider the Cannock Chase Local Plan 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 Cannock Chase Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The reference to "Bird and bat boxes/bricks integrated into the structure of existing and/or new buildings" in Policy SO7.1 supporting text paragraph 6.278 (page 122) is welcome but in summary it is not currently sound because it's not effective nor consistent with national policy due to a lack of reference to best-practice guidance, especially with regard to numbers and location of swift bricks for each development and the applicability to smaller but suitable developments such as extensions, and because there is no specific mention of swift bricks as per national guidance.

In more detail, swift bricks are specifically highlighted as valuable to wildlife in NPPG Natural Environment 2019 paragraph 023, along with bat boxes, and routes for hedgehogs - I believe they are the only type of bird box mentioned in national planning guidance because:

Swift bricks are a universal nest brick for small bird species, including red-listed species such as swifts and house sparrows, so are relevant for all developments (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) ).

They are the only type of standard bird brick compliant with British Standard BS 42021:2022 because they can be used safely by all small bird species (e.g. a starling brick is only compliant with BS 42021 if it is specially designed to allow a swift to climb out as they can otherwise get trapped inside).

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/>)).

Many other Local Authorities are including detailed swift brick requirements in their Local Plan, such as Cotswold District Council which is 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/> ), Tower Hamlets Local Plan Regulation 18 stage (paragraph 19.70, page 311 - <https://talk.towerhamlets.gov.uk/17424/widgets/82097/documents/50138> ), 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 two 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> ),

Cannock Chase Council:  
Cannock Chase Local Plan  
Representation Form



so such an enhanced level should also be considered.

*(Please continue on a separate sheet if necessary)*

**Q5. Please set out the modification(s) you consider necessary to make the Cannock Chase Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 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 Regulation 19: Pre-Submission Draft of the Cannock Chase Local Plan 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 add text to Policy SO7.1 supporting text paragraph 6.278 (or a new paragraph) as follows, to make it sound by adding effective reference to best-practice guidance, and making it consistent with national policy by making specific reference to swift bricks as per national planning guidance:

Swift bricks should be installed in all new developments including extensions, in accordance with best-practice guidance such as BS 42021 or CIEEM which requires at least one swift brick per home on average for each development. Photographic evidence of suitable installation should be provided. Swift bricks are a universal nest brick for small bird species.

Please amend paragraph 6.278 to make it consistent with national planning guidance and best-practice guidance BS 42021:

Swift bricks and bat boxes integrated into the structure of existing and/or new buildings

OR

Bird boxes, such as swift bricks, and bat boxes integrated into the structure of existing and/or new buildings

Note it would also be clearer, and more consistent with national planning guidance which mentions "routes", to amend the third bulletpoint in 6.278 to:

Wildlife routes under paths and roads, and through fencing

*(Please continue on a separate sheet 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.***

**Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Cannock Chase Local Plan, do you consider it necessary to participate in examination hearing session(s)?**

**Cannock Chase Council:  
Cannock Chase Local Plan  
Representation Form**



*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.*

- No, I do not wish to participate in hearing session(s)
  - Yes, I wish to participate in hearing session(s)
- (Please tick one box)*

**Q7. 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.              |
| <i>(Please continue on a separate sheet if necessary)</i> |

***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.

|            |  |       |          |
|------------|--|-------|----------|
| Signature: |  | Date: | 18/03/24 |
|------------|--|-------|----------|