

Page: Client or Agent details (Consultations)

- First name Gavin
- Last name Thomas
- Your address [REDACTED]
- Telephone number [REDACTED]
- Email address [REDACTED]
- Preferred contact method Email
- Is an agent representing you No

Page: Local Plan Legal Compliance

- Do you consider the Local Plan to be legally compliant No
- If no, please state why The reference to "swift nest bricks" in paragraph 5.92 of Policy DM04: Biodiversity Net Gain is not consistent with national policy because it only relates to "small sites where there is minimal loss of habitat of low ecological value", whereas NPPG 2019 Natural Environment paragraph 023 highlights the value of swift nest bricks to ALL types of development. Swift bricks are a universal nest brick that can be built into buildings and are suitable for all locations and all types of development, which are excluded from the Biodiversity Net Gain methodology, so need their own clear policy for all developments. It is a straightforward measure that will hugely improve urban biodiversity including several species of bird, not just Swifts, that are on the UK Birds of Conservation Concern list.

Page: Local plan Soundness

- Do you consider the Local Plan to be sound No
- Why do you believe the Local Plan is unsound D) It is not consistent with national policy
- Why do you feel that the Local Plan is unsound The reference to "swift nest bricks" in paragraph 5.92 of Policy DM04: Biodiversity Net Gain is not consistent with national policy because it only relates to "small sites where there is minimal loss of habitat of low ecological value", whereas NPPG 2019 Natural Environment paragraph 023 highlights the value of swift nest bricks to ALL types of development. Swift bricks are a universal nest brick that can be built into buildings and are suitable for all locations and all types of development, which are excluded from the Biodiversity Net Gain methodology, so need their own clear policy for all developments. It is a straightforward measure that will hugely improve urban biodiversity including several species of bird, not just Swifts, that are on the UK Birds of Conservation Concern list.
- What changes do you consider necessary, in order to make the Local Plan sound To make it sound and consistent with national policy to halt biodiversity decline please add to Policy DM04 paragraph 5.92: "Swift bricks are a universal nest brick for multiple bird species and should be installed in ALL new developments including extensions in accordance with best-practice guidance such as BS 42021."
- Have you raised this matter(s) at an earlier stage in the preparation of the Local Plan No

- If no, please explain Only recently became aware of the matter.

Page: Local plan additional comments

- Please provide any additional comments in support of your representation Pendle is an important area for biodiversity, including Swifts and the measures I've outlined are a critical action to help halt their national decline.
- Do you wish to participate at the hearing sessions No
- How did you find out about this consultation Other
- What other way did you hear about this consultation From a friend