

Rachel Hunt - Trowbridge

To Councillor Toby Sturgis, Cabinet Member for Spatial Planning, Development Management and Property

Question (6)

(a) **Bat Corridors at Site 1021**

I note from amendments to the Draft Strategy that site 1021 has been extended to allow mitigation land for bat corridors and that the plan states that these corridors will be inclusive of gardens. Modern gardens are well lit, social spaces which are not suitable for dark corridors. Also, there will need to be a planned maintenance and monitoring process for these very rare bats, which is clearly not possible if the “dark corridor” is owned by different house owners. Wiltshire Councils (Bat Special Areas of Conservation (SAC) Planning Guidance for Wiltshire) regarding the protection of bats states that:

All mitigation land should be transferred to a single responsible body and should be visible and accessible to facilitate effective compliance, monitoring and enforcement. It is not acceptable to rely on land in multiple and / or private ownerships e.g. private gardens, as appropriate management of such features cannot be secured for the long term – conditions would be unenforceable. Clearly, gardens should be excluded from the bat corridors on site 1021. **Can the Council confirm that the bat corridors including those which run adjacent to all the hedgerows, will not include gardens and will be transferred to a single body for compliance, monitoring and enforcement?**

(b) **Listed Building Preservation**

Can the council confirm that the outlook of the 7 listed building will be maintained following any development of site 1021? St John’s Church and adjoining buildings currently have wide ranging views across the surrounding countryside which would need to be preserved in accordance with the Listed Buildings and Conservation Areas Act 1990;

(c) **Brownfield Sites**

Can the council offer residents of Trowbridge reassurances that brownfield sites such as Bowyers (which has not yet confirmed its residential quota), will be developed before any greenfield sites are approved for planning? At site 1021 there is an allocation of just 45 houses. If this allowance can be fulfilled by current brownfield sites, presumably planning would not be granted on this site. Please comment.

(d) **Continued lack of response to requested information by Wiltshire Council**

On the 19th June 2018 a letter and email was sent to Baroness Jane Scott and Spatial Planning regarding the flawed process carried out by Wiltshire Council with regard to the Draft Strategy. In this letter I requested answers to several questions before the Cabinet Meeting on the 3rd July so that I could prepare questions in an informed manner. I have had no response from spatial planning and a brief acknowledgement that the letter had

arrived from Baroness Scott's Secretary. This is just another example of Wiltshire Councils flawed approach to consulting and responding to residents. I would request that no further decision are made regarding the HSAP until a full response to these queries has been received.

Response

- a) Lambrook Stream is likely to be an important commuting corridor for bats and it will be protected from any development by virtue of the flood plain which is between 25 and 60m wide within the allocation boundary. In order to function efficiently, the floodplain must have no obstructions such as garden fences. The intention behind extending the site to include the floodplain is to respond to Natural England's suggestion that this area should be used as on site mitigation for bats.

The long-term management of such land, will be a matter of detail to be determined at the planning application stage. However, this could be through a management company associated with the development.

Any planning applications submitted for the proposed allocation at Trowbridge will be subject to further assessment under the Habitats Regulations (HRA) and will need to demonstrate there would be no adverse effect on the Bath and Bradford on Avon Bats SAC by following the mitigation principles established in the HRA for the draft Plan. At Church Lane it is anticipated that impacts arising from developing land outside the floodplain will be offset in the bat commuting corridor and through the Trowbridge Bat Mitigation Strategy.

- b) The draft Wiltshire Housing Site Allocations Plan and supporting evidence in the Heritage Impact Assessment recognise the importance of the heritage assets of Church of St John (grade II listed), associated church school and school master house (grade II listed), 344 Frome Road (grade II listed, former farm/weavers cottages) and Rose Villa (grade II listed) and their settings.

Proposed change 47 (PC47) sets out the considerations for planning applications on this site:

"The layout and design of the site would need to give great weight to conserving the significance of these heritage assets and their setting to minimise harm. Access to the site must be sensitively designed and accommodated in manner that minimises harm to heritage assets."

Any proposed development of the site would therefore need to ensure that great weight is given to the listed buildings and their setting.

- c) Brownfield sites in Trowbridge can come forward alongside greenfield development but it is not possible to place reliance on brownfield development only as greenfield sites are also needed at the town in order to ensure sufficient housing land supply.
- d) A full response to the letter of the 19th June was sent on Thursday 28th June from Cllr Sturgis.