

23/02/2019

Dear Ian,

Wiltshire Council Housing Site Allocation Plan Examination – Site 2.4 Church Lane

Thank you for your email regarding the WHSAP Examination. In addition to my previous letter dated 20/2/19, I would like to add to Matter 1 and Matter 3 raised by the Inspector:

Matter 3: Housing Site Allocations

5.3

What is the likely impact of the proposed development on the following factors and do any of these indicate that the site should not be allocated:

- **biodiversity, in particular but not restricted to European protected habitats and species;**

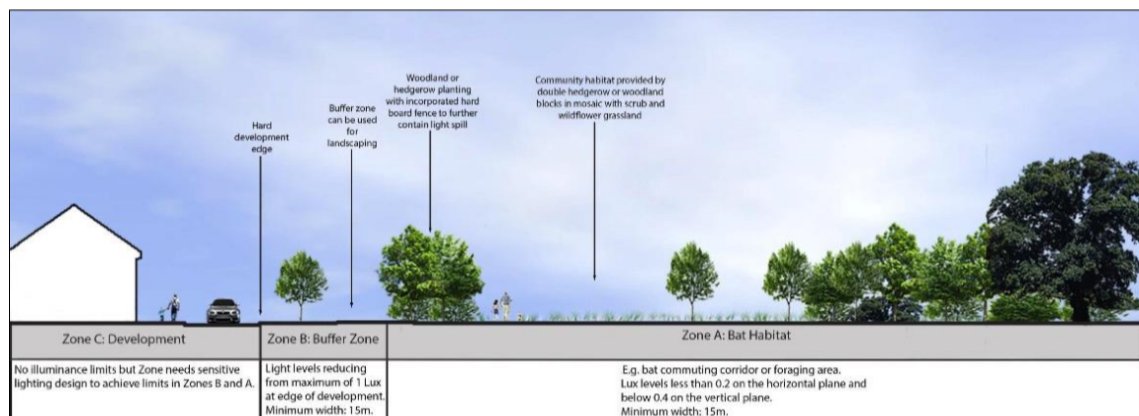
5.4 In relation to the above, does the plan contain effective safeguards or mitigation measures necessary to achieve an acceptable form of development?

In the light of the recommendations made in the Draft Bat Mitigation Strategy, Site 2.4 Church Lane should be removed from the allocated sites for the following reasons:

In summary, the document states that:

1. Site 2.4 is lies within a Yellow Zone, identified as of Medium Risk with regards to bat flight paths, commuting and foraging routes and as such should be protected by suitable mitigation.
2. Hedgerows, especially ancient hedgerows should be maintained and protected **and** infilled where gaps have been made.
3. A **MINIMUM** of 15m dark bat habitat (in public ownership) should be put in place **PLUS** a further 15m buffer zone (soft landscaping) before any hard development should take place. See example diagram below.

Figure 6 Core bat habitat feature and associated buffer zone



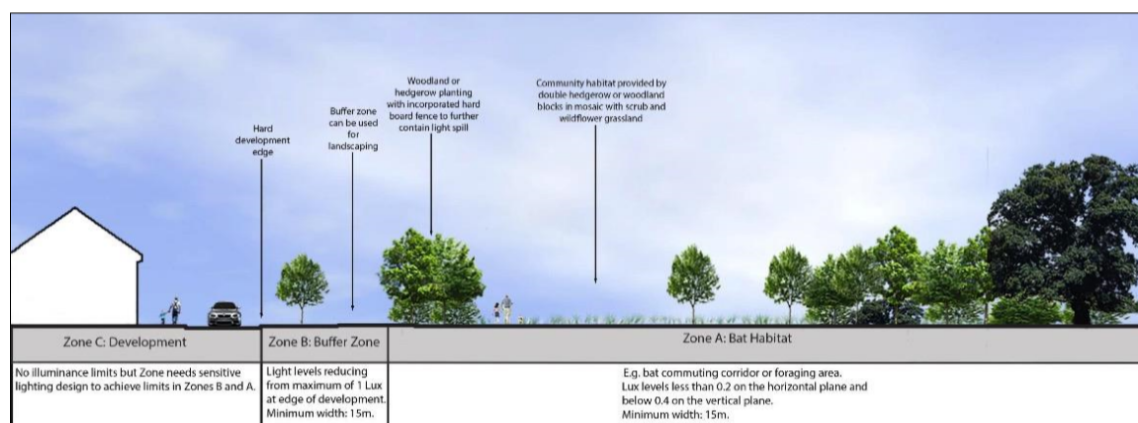
This information, which should have been provided at the start of Stage 5 of the WHSAP alongside WC's lack of thorough investigation (see my previous letter 20/2/2019) with regard to the heritage assets of the site, show that WC did not follow a thorough and sound process when selecting the site.

In addition, the WHSAP states that a bat corridor of 10m-15m should be provided as mitigation. This is clearly not in line with the recommendation made in The Draft Trowbridge Bat Mitigation Strategy. In fact, the recent planning application for Site 2.4 only provides a 10m bat corridor (see Planning application 18/10035/OUT).

Proposed changed wording

A **MINIMUM** of 15m dark bat habitat (in public ownership) should be put in place **PLUS** a further 15m buffer zone (soft landscaping) before any hard development should take place. See example diagram below.

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Finally, I would like to request that the Inspector requires that the current the planning application for site 2.4 (18/10035/OUT), which has been based on WHSAP be put on hold until all investigations and recommendations are made by the Inspectorate to WC.

Yours sincerely,

Rachel Hunt