

## Wiltshire Council

### Cabinet

4 February 2020

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**Subject:** Trowbridge Bat Mitigation Strategy Supplementary Planning Document

**Cabinet Member:** Councillor Toby Sturgis, Cabinet Member for Spatial Planning, Development Management and Investment

**Key Decision:** Key

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#### Executive Summary

The landscape surrounding Trowbridge is known to be of high importance for bats, supporting at least 14 of the 18 UK bat species. This includes all four of the rarer UK species listed in Annex II of the Habitats Directive (European Council, 1992): greater horseshoe, lesser horseshoe, Bechstein's and barbastelle bats.

In particular, the woodlands to the east and south-east of Trowbridge are known to support a large and internationally significant breeding population of Bechstein's bat, linked to the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC).

The overall aim of the Trowbridge Bat Mitigation Strategy (TBMS) is to provide a clear and detailed approach to considering impacts of development around Trowbridge on the Bath and Bradford-on-Avon Bats SAC. This will help inform strategic and local planning for the area's housing needs.

Significant potential effects to the integrity of the SAC include impacts to the foraging areas and commuting routes in the landscape used by bats, as well as their roost sites and can include:

- Habitat degradation;
- Lighting e.g. increased;
- Noise and vibration e.g. construction/demolition activity close to roosts;
- Recreational disturbance e.g. urbanisation, damage to vegetation, dumping of waste, fires and vandalism;
- Pollution e.g. dust and fumes from vehicles; and
- Mortality e.g. predation by cats and collision with vehicles.

Core Policy 29 of the Wiltshire Core Strategy anticipates a significant level of growth at Trowbridge over the period up to 2026, including 2,600 homes coming forward on the allocation at Ashton Park to the south-east of the town. In addition, the Wiltshire Housing Site Allocations Plan has been prepared to support the delivery of housing at the town in line with Core Policy 29.

The TBMS has been prepared as a Supplementary Planning Document (SPD) to provide certainty for developers and local communities in terms of how development and mitigation measures will be guided to ensure the integrity of the SAC and the core bat habitats around the town are protected and enhanced.

At its heart is the delineation of buffer areas around the woodlands and two zones (the red and yellow zones) within which major development will either be resisted, or considered, subject to the delivery of appropriate mitigation measures to address habitat creation and the management of recreational pressure (grey hatched zone).

The preparation of SPDs follows a prescribed process set out in legislation. The TBMS was published for consultation for a 4-week period commencing 21 February 2019. Due process has therefore been followed and thorough consideration of the consultation responses received has been undertaken. All amendments to the draft TBMS have been prepared to address, where practicable, the issues raised through the consultation.

Adopting the TBMS as an SPD will significantly assist in the implementation of the Wiltshire Housing Site Allocations Plan as well as planned residential development at Trowbridge in line with the Wiltshire Core Strategy. Moreover, it will assist local communities plan for housing development through their neighbourhood plans and thereby help guide development around the town.

As an SPD, the guidance set out in the TBMS will be afforded greater weight in the decision-making process. In this regard it will provide greater certainty to the development industry and local communities in terms of how housing at the town will be delivered, whilst helping to ensure the integrity of the Bath and Bradford-on-Avon Bats SAC is appropriately protected and enhanced in line with legislation through the delivery of appropriate mitigation measures.

### **Proposal(s)**

That Cabinet:

- (i) Notes the reponse to the consultation on the draft Trowbridge Bat Mitigation Strategy Supplementary Planning Document (the TBMS) set out in the Consultation Statement at **Appendix 1**.
- (ii) Endorses the amended TBMS as set out in **Appendix 2**.
- (iii) Recommends to Council that they adopt the amended TBMS as a Supplementary Planning Document.
- (iv) Subject to approval of Council, agrees that the Director for Economic Development and Planning in consultation with the Director for Legal, Electoral and Registration Services and the Cabinet Member for Spatial Planning, Development Management and Investment, undertakes the

final stages associated with the formal adoption and publication of the TBMS, including any minor textual changes in the interests of clarity and accuracy.

**Reason for Proposal(s)**

To:

- (i) Ensure that the TBMS is formally adopted as a Supplementary Planning Document (SPD) to assist the implementation of the Wiltshire Housing Site Allocations Plan for development on the housing allocations at Trowbridge, as well as windfall and neighbourhood plan sites in line with the Wiltshire Core Strategy; and
- (ii) Provide guidance to developers on where proposals for housing development would be acceptable and what would constitute acceptable mitigation measures to ensure the integrity of the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC) is protected and enhanced.

**Alistair Cunningham**  
**Chief Executive Officer - Place**

## Wiltshire Council

### Cabinet

4 February 2020

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**Subject: Adoption of Trowbridge Bat Mitigation Strategy  
Supplementary Planning Document**

**Cabinet Member: Councillor Toby Sturgis Cabinet Member for Spatial  
Planning, Development Management and Investment**

**Key Decision: Key**

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### Purpose of Report

To:

- (i) Provide Cabinet with the response to the consultation on the draft Trowbridge Bat Mitigation Strategy Supplementary Planning Document (TBMS), as set out in the Consultation Statement at **Appendix 1**.
- (ii) Recommend that Cabinet endorses the amended TBMS as set out in **Appendix 2**.
- (iii) Recommends to Council that they formally adopt the amended TBMS as a Supplementary Planning Document (SPD).
- (iv) Subject to approval of Council, agrees that the Director for Economic, Development and Planning in consultation with the Director for Legal, Electoral and Registration Services and the Cabinet Member for Spatial Planning, Development Management and Investment, undertakes the final stages associated with the formal adoption and publication of the TBMS, including any minor textual changes in the interests of clarity and accuracy.

### Relevance to the Council's Business Plan

1. The TBMS is fundamentally linked to the implementation of planning policy and the sustainable management of housing growth at Trowbridge. It sets out clear guidance for developers and the local community on how the delivery of new housing at the town can be achieved whilst protecting and enhancing the integrity of the Special Area of Conservation (SAC). It is linked to the following aims of the Business Plan:

**Growing the Economy** - Balancing the objective of growing the community with protecting the environment.

## **Strong Communities**

Good countryside access and cycling and walking opportunities.

### **Background**

2. The landscape surrounding Trowbridge is known to be of high importance for bats, supporting at least 14 of the 18 UK bat species. This includes all four of the rarer UK species listed in Annex II of the Habitats Directive (European Council, 1992): greater horseshoe, lesser horseshoe, Bechstein's and barbastelle bats.
3. In particular, the woodlands<sup>1</sup> to the east and south-east of Trowbridge are known to support a large and internationally significant breeding population of Bechstein's bat, linked to the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC).
4. The overall aim of the Trowbridge Bat Mitigation Strategy (TBMS) is to provide a clear and detailed approach to considering impacts of development around Trowbridge on the Bath and Bradford-on-Avon Bats SAC. This will help inform strategic and local planning for the area's housing needs.
5. Significant potential effects to the integrity of the SAC include impacts to the foraging areas and commuting routes in the landscape used by bats, as well as their roost sites and can include:
  - Habitat degradation;
  - Lighting e.g. increased;
  - Noise and vibration e.g. construction/demolition activity close to roosts;
  - Recreational disturbance e.g. urbanisation, damage to vegetation, dumping of waste, fires and vandalism;
  - Pollution e.g. dust and fumes from vehicles; and
  - Mortality e.g. predation by cats and collision with vehicles.
6. Core Policy 29 of the Wiltshire Core Strategy (WCS) anticipates a significant level of growth at Trowbridge over the period up to 2026, including 2,600 homes coming forward on the allocation at Ashton Park to the south-east of the town. In addition, the Wiltshire Housing Site Allocations Plan has been prepared to support the delivery of housing at the town in line with Core Policy 29.
7. The TBMS has been prepared as a Supplementary Planning Document (SPD) to provide greater certainty for developers and local communities in terms of how development and mitigation measures will be guided to help to ensure the integrity of the SAC and the core bat habitats around the town are protected and enhanced. At its heart is the delineation of buffer areas around the woodlands and two zones (the red and yellow zones, see Figure 4 Appendix 2) within which major development will either be resisted, or considered, subject to the delivery of appropriate mitigation

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<sup>1</sup> Biss Wood, Green Lane Wood and Picket and Clanger Wood

measures to address habitat creation and the management of recreational pressure (grey hatched zone, see Figure 5 Appendix 2).

8. The preparation of SPDs follows a prescribed process set out in legislation. The TBMS was published for consultation for a 4-week period commencing 21 February 2019.

### **Main Considerations for the Council**

9. The National Planning Policy Framework is clear that sustainable development must include a reversal on the net loss of biodiversity. Core Policy 50 of the WCS accords with this principle and in doing so seeks to protect and enhance features of biodiversity and geological value.
10. In the light of national and local planning policy (WCS), the Trowbridge Bat Mitigation Strategy (TBMS) has been prepared to be adopted as a Supplementary Planning Document (SPD) to give it greater weight in the decision-making process. Full regard has therefore been given to the relevant legislative process<sup>2</sup>.
11. The purpose of the TBMS is to provide a clear and detailed approach to establishing mitigation measures in the Trowbridge area to protect the bat species in the Bath and Bradford on Avon Bats Special Area of Conservation (SAC) from recreational pressure and loss of core habitat. It has been primarily prepared to support the allocations set out in the Wiltshire Housing Site Allocations Plan (WHSAP) and thereby helps support the planned delivery of housing established in Core Policy 29 of the WCS.
12. Notwithstanding this primary role, the TBMS has also been prepared to help guide growth at the town. In this regard, it will be utilised to assist the review of the WCS, the preparation of neighbourhood plans in the local area and, as appropriate, decisions on individual planning applications.

### ***Consultation on the draft TBMS***

13. Between the 21 February and 21 March 2019, over 800 individuals and organisations were consulted via email, the Council's online consultation portal or by post on the [draft Trowbridge Bat Mitigation Strategy](#). An exhibition was held at County Hall in Trowbridge on 26 and 28 February for members of the public to talk to officers, ask questions and understand how to comment on the strategy. The consultation was also advertised in the local press and on the Wiltshire Council website. The Consultation Report at **Appendix 1** clarifies how the consultation was undertaken and provides a summary of the main issues raised.

### ***Main issues raised through consultation***

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<sup>2</sup> The Town and Country Planning (Local Planning) (England) Regulations 2012, Part 5,

14. The strategy is supported by Natural England and several other advisory bodies. The main issues raised during consultation were:
- Natural England would welcome assurances that there will not be a long lag-time between development occurring and mitigation measures being implemented; and that the Bechstein's bat population at Trowbridge is referred to in the strategy.
  - Trowbridge Town Council would like more clearly defined buffer zones, clearer definitions of 'core bat habitat' and terms such as 'wide swathe' of land. In addition, they have called for more clarity as to how the recreational and bat sensitivity zones have been defined.
  - Friends of Southwick Country Park would like a location for Suitable Alternative Natural Greenspace (SANG) to be decided now as they believe the ecological value of Southwick Country Park has been overlooked due to it not yet being designated a Local Nature Reserve (LNR).
  - Ecological consultants and local interest groups, Campaign to Protect Rural England West Wiltshire and The White Horse Alliance, have raised concerns that the strategy is not capable of mitigating indirect or direct adverse effects on bat habitats and hence falls short of addressing the requirements of the Habitats Directive in terms of providing scientific certainty.
  - Developers raised their concerns that the zones pose too many constraints to development in the Trowbridge area and that mitigation may become too costly to deliver.
15. Despite the issues raised, the strategy is welcomed and supported by Natural England, Wiltshire Wildlife Trust, the Wiltshire Bat Group and ecological consultants. Natural England praises the strategy for being proportionate in terms of survey requirements and the approach to on-site and off-site mitigation and is confident the strategy provides a high-level of certainty that development, when considered in terms of cumulative and residual effects, will lead to an improved environment for bats. Wiltshire Wildlife Trust and the Wiltshire Bat Group welcome the strategy, in particular its emphasis on delivering mitigation at a landscape-scale
16. A list of representations can be found in the Consultation Statement (**Appendix 1**). The Statement provides a response to all the main issues raised by individuals and organisations during the consultation. In addition, it describes what changes should be made to the draft TBMS to address, where necessary, the main issues raised.

***Response to the consultation and proposed changes to the TBMS***

17. In accordance with legislative process<sup>3</sup>, before the Council can adopt the TBMS as a SPD it must have regard to the main issues raised through the consultation and how such issues have been addressed. As outlined above, these considerations are set out in more detail within the Consultation Statement (**Appendix 1**). A summary of the recommended actions to resolve the main issues raised and how the draft TBMS should be amended is set out below. **Appendix 2** sets out the TBMS as amended in response to the comments.

*Natural England*

18. To address the issue raised by Natural England about minimising the lag-time between development and mitigation measures being in place, wording should be incorporated into the TBMS to confirm: a) the timescale for appointing the Project Officer; and b) that the Project Officer will liaise with Natural England to secure an acceptable programme of mitigation measures. In addition, the significance of the Bechstein's bat population at Trowbridge should be inserted.

*Friends of Southwick Country Park*

19. Although a full account of the Country Park's ecological value is outside the scope of the TBMS, a reference should be added to highlight the Park's biodiversity, including its value for important protected SAC bats, as well as the efforts being made by Wiltshire Council to designate it as a Local Nature Reserve.
20. The TBMS should record that where increased recreational pressure at the Country Park is unavoidable, due to the proximity of the closest allocations, developer contributions will be used to ensure this does not generate negative effects to biodiversity in the Country Park.
21. The TBMS has fully considered the potential impacts associated with implementing the housing allocations at Trowbridge set out in the Wiltshire Housing Site Allocations Plan (WHSAP). A costed, 'worst-case scenario for bats' has been provided which gives flexibility for achieving the best overall outcomes in respect of mitigation measures to address recreational pressure and/or enhancements to core bat habitat. The role the Country Park will play in helping support the objectives of the TBMS will be further investigated and refined when the Project Officer is in post.

*Trowbridge Town Council*

22. In response to Trowbridge Town Council's concerns over the clarity of definitions, further explanation of key terms should be strengthened to improve its precision e.g. terms such as: 'core bat habitat' should be defined.

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<sup>3</sup> The Town and Country Planning (Local Planning) (England) Regulations 2012, Regulation 12

23. Figure 6 (core bat habitat features and associated buffer zone) should be reviewed and clarified to overcome ambiguities and provide greater precision for the user of the TBMS. The grey hatched recreational sensitivity zone is based on the distance people are prepared to travel to reach woodlands, while the yellow and red buffer zones are based on bat records and scientific research. While the evidence underpinning the buffer zones is considered to be robust, it is difficult to precisely monitor Bechstein's bats and therefore the Council has taken a precautionary approach to ensure that less frequent, but equally important migration routes are captured.
24. It is acknowledged that further clarification of what is required by different types of planning application is needed within the TBMS. To address this a new sub-section should be added to summarise the submission requirements for planning. This includes a table which identifies the requirements for Outline, Full, Reserved Matters and Householder applications.

#### *Development industry*

25. The development industry was primarily concerned with the perceived level of restriction to development that the TBMS would introduce if implemented. This is a matter that was debated during the examination hearing sessions for the WHSAP. Although the TBMS, as a proposed SPD, could not be formally examined by the Inspector, he nonetheless concluded in his report (which is the subject of a separate Agenda item) that the TBMS has been prepared in a robust manner with full regard to legislative provisions and the necessary input of Natural England. In these regards, the Inspector was satisfied that the relationship between the WHSAP and the TBMS is important in ensuring the housing allocations at Trowbridge are implemented with full regard to the protection of bats and core bat habitats.
26. Whilst the views of the development industry in terms of restrictions to growth are noted, the legal framework (The Habitats Regulations), national planning policy (NPPF) and local planning policy (the WCS and WHSAP) are significant considerations that have underpinned the preparation of the TBMS.
27. Having considered all representations, it is considered that the TBMS sets out a robust, reasonable and sufficient level of mitigation necessary to enable further development at Trowbridge to proceed without contravening the Habitats Regulations. This position is supported by Natural England. The TBMS also aims to increase availability of access and recreation for the town.
28. The Ashton Park WCS allocation was a recurring issue in regard to its inclusion or exclusion from certain parts of the TBMS sensitivity zones. Consultees raised the point that it should be included in some maps to show its boundary in relation to the zones and other local core bat habitat. However, it is then also pointed out that it should be removed from some tables and an explanation given as to why.

29. Clarity should therefore be provided in the TBMS confirming that no further mitigation measures are required to support the Ashton Park proposals in view of the specific, detailed and approved mitigation strategy plan for the site. In addition, greater emphasis should be provided to highlight the policies set out in the WHSAP covering the allocations at Trowbridge and the mitigation measures that will be required.
30. Figures 4 (Bat Habitat Sensitivity Zones) and 5 (Bat Recreational Sensitivity Zones), should therefore be altered to reflect the fact that the TBMS does not need to set out mitigation measures for Ashton Park as this scheme has its own bespoke mitigation arrangements.

*Ecological consultants and local interest groups*

31. Concerns raised regarding the effectiveness and deliverability of the mitigation measures set out with the WHSAP and TBMS have been fully considered. It is considered that, and Natural England agrees, the WHSAP will be delivered effectively and therefore avoid harmful impacts to bats and core bat habitat. Again, this is a point that was discussed through the examination of the WHSAP and the Inspector is satisfied that the Plan, as amended by his Main Modifications ensures this important principle will be delivered.
32. Moreover, a number of consultation responses supported the view that the WHSAP is both effective and proportionate in its treatment of necessary mitigation. The Plan takes a precautionary approach (i.e. assumes all habitat lost is used by SAC bats and directs development to lower risk zones). The mitigation measures, such as including appropriate buffers and 100% habitat loss mitigation, have been established in the TBMS and will be used to help inform the preparation of detailed planning applications covering the allocated sites at Trowbridge. This will ensure that negative effects/impacts associated with development are robustly minimised. It is considered that these measures are sufficient to address issues raised by ecological consultants, local interest groups and members of the public about the achievability of the strategy.
33. Detailed concerns regarding hedgerow legislation have been fully considered. The Council's position regarding hedgerows is that the breaching of certain hedgerows may well be unavoidable. Indeed, such works are not prohibited by legislation. However, mitigation will need to ensure that across development sites as a whole, habitat continuity is maintained. In-combination impacts will be mitigated offsite through Section 106 contributions in line with the TBMS.
34. In summary, it is considered that the consultation responses received in respect of the TBMS have been appropriately and fully addressed. The proposed amendments that are set out in the Consultation Statement (**Appendix 1**) and incorporated into the final draft of the Strategy (**Appendix 2**) are reasonable and reflective of the comments received. In this regard, the Strategy has been strengthened to provide greater clarity and precision. In reviewing the TBMS, other additional minor changes

have also been made in the interest of clarity and accuracy but do not alter the overall substance of the document consulted on.

### **Overview and Scrutiny Engagement**

35. There has been no overview and scrutiny engagement throughout the preparation of the TBMS.

### **Safeguarding Implications**

36. There are no safeguarding implications arising from the proposal.

### **Public Health Implications**

37. The TBMS sets out robust guidance for developers on how housing development at Trowbridge can protect and enhance the integrity of the Bath and Bradford-on-Avon Bats SAC. In this regard, it advises that development proposals should be sensitively planned in locations that reduce pressure on the key woodland habitat sites to the south-east of the town, whilst providing new habitat and areas of open space. Such measures will assist in the delivery of new recreation opportunities, increased habitat and green infrastructure connectivity, as well as new walking and cycling routes away from the core woodland bat habitats.

### **Procurement Implications**

38. It is considered that there are no procurement implications associated with the proposal.

### **Equalities Impact of the Proposal**

39. The consultation process was undertaken in accordance with the Council's Statement of Community Involvement and legislative procedures. The Council engaged widely with Natural England, Trowbridge Town Council, local bat experts, general public and the development industry. Therefore sufficient opportunity has been provided for all those with an interest in the TBMS to provide comments and help shape its final form as a SPD.

### **Environmental and Climate Change Considerations**

40. At the heart of the Council's planning policy framework is the objective of delivering sustainable development that addresses and adapts to the predicted effects of climate change. The policies of the WCS and WHSAP embody this requirement and have accordingly been found sound through independent examination on such matters.
41. The TBMS has been prepared to assist with the implementation of Wiltshire Housing Site Allocations Plan and Wiltshire Core Strategy. In this regard, it helps guide the design and delivery of mitigation measures to ensure the qualifying features of the Bath and Bradford-on-Avon Bats

Special Area of Conservation are robustly protected in line legislative provisions, as well as national and local planning policy.

### **Risks that may arise if the proposed decision and related work is not taken**

42. If the TBMS SPD is not adopted, the principle risk will be that planned growth at Trowbridge fails to appropriately address the requirements of legislative processes associated with the Habitats Directive and this would likely impact upon these development sites coming forward in the Trowbridge area.

### **Risks that may arise if the proposed decision is taken and actions that will be taken to manage these risks**

43. None identified.

### **Financial Implications**

44. The financial implications of adopting and publishing the TBMS will need to be met from existing budget allocations for Economic Development and Planning and will be limited.
45. Implementing the TBMS will rely upon prioritising the use of Community Infrastructure Levy for the delivery of recreational mitigation. This possibility was reported to Cabinet on 11 October 2018, when provision was made to direct CIL funding towards such projects. Appendix 2 of the TBMS costs recreation mitigation at around £1.35m, which includes provision for an officer to deliver the mitigation.

### **Legal Implications**

46. In accordance with Part 5, Regulations 11 to 16 of the Town and Country Planning (Local Planning) (England) Regulations 2012, before a local planning authority can adopt an SPD (or revisions to one) it must consult for not less than four weeks and then prepare a Consultation Statement setting out who was consulted, a summary of the main issues and how they have been addressed in the SPD.
47. The TBMS has been prepared in compliance with legislative requirements and the amendments tabled for consideration respond appropriately and effectively to the consultation responses received.
48. As soon as reasonably practicable after the local planning authority adopt a SPD they must:
  - (a) Make available in accordance with Regulation 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012, by publishing on their website and making available for inspection at their principal offices and other places within their area as the local planning authority consider appropriate (e.g. all council libraries and main office hubs) during normal office hours, the:

- (i) SPD; and
    - (ii) an adoption statement, which includes the date on which the SPD was adopted and, pursuant to Section 23(1) of the Planning and Compulsory Purchase Act 2004, any modifications made since the draft supplementary planning document was subject to consultation, and
  - (b) Send a copy of the adoption statement to any person who has asked to be notified of the adoption of the supplementary planning document
49. Any person with sufficient interest in the decision to adopt the supplementary planning document may apply to the High Court for permission to apply for judicial review of that decision, and that any such application must be made promptly, and in any event not later than three months after the date on which the supplementary planning document was adopted.

### **Workforce Implications**

50. There is sufficient workforce in place to finalise the adoption of the TBMS. See financial implications above also.

### **Options Considered**

51. The options considered are:
- (i) To adopt the Trowbridge Bat Mitigation Strategy (TBMS), as proposed to be amended in response to the consultation, as a SPD to support the implementation of the Wiltshire Core Strategy and Wiltshire Housing Site Allocations Plan; or
  - (ii) Not adopt the TBMS.
52. Having considered all matters, including: due process, consultation support from a number of critical stakeholders e.g. Natural England, the value of the TBMS in helping guide development around Trowbridge and the findings of the Inspector who examined the WHSAP, it is clear that proceeding to adopt the TBMS represents the most logical option.

### **Conclusions**

53. Adopting the TBMS as a SPD will significantly assist in the implementation of the Wiltshire Housing Site Allocations Plan as well as planned residential development at Trowbridge in accordance with the WCS. Moreover, it will assist local communities plan for housing development through neighbourhood plans and thereby helping guide development around the town.
54. As an SPD, the guidance set out in the TBMS will be afforded greater weight in the decision-making process. In this regard it will provide certainty to the development industry and local communities in terms of

how housing at the town will be delivered, whilst ensuring the integrity of the Bath and Bradford-on-Avon Bats SAC is appropriately protected and enhanced in line with legislation through the delivery of appropriate mitigation measures.

## **Sam Fox (Director - Economic Development and Planning)**

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Date of report: January 2020

### **Appendices**

Appendix 1: Draft Trowbridge Bat Mitigation Consultation Statement

Appendix 2: The Trowbridge Bat Mitigation Strategy - Adoption Draft

### **Background Papers**

The following documents have been relied on in the preparation of this report:

[Trowbridge Bat Mitigation Strategy Supplementary Planning Document - Draft for Consultation \(February 2019\)](#)