

Appendix 1

Council Paper

**Consultation Statement on the
Trowbridge Bat Mitigation Strategy
Supplementary Planning Document
(Draft for consultation, February 2019)**

January 2020

Contents

1. Overview of the preparation of the Trowbridge Bat Mitigation Strategy Supplementary Planning Document	4
3. Consultation Methodology	5
3. Representations	7
4. Draft Trowbridge Bat Mitigation Strategy - Supplementary Planning Document - summary of main issues raised through representations.....	8
5. Draft Trowbridge Bat Mitigation Strategy Supplementary Planning Document – Proposed changes from 2019 consultation	12
Appendix A - List of Consultation Responses	23
Appendix B – Press advert and insertion into the Town and Parish Newsletter	69
Appendix C - Letter sent by email or post	70
Appendix D - Wiltshire Council Website	72

1. Overview of the preparation of the Trowbridge Bat Mitigation Strategy Supplementary Planning Document

- 1.1. Between 21 February and 21 March 2019, the Council consulted on the [‘Trowbridge Bat Mitigation Strategy Supplementary Planning Document - Draft for Consultation February 2019’](#).
- 1.2. Regulations 11 to 16 of the Town and Country Planning (Local Planning) (England) Regulations 2012 set out the requirements for preparing a Supplementary Planning Document (SPD). Regulation 12 requires the Council to prepare a statement setting out who was consulted, a summary of the main issues they raised and how those issues have been addressed in the final SPD.
- 1.3. The Council has therefore produced this ‘Consultation Statement’, to set out:
 - The consultation methodology;
 - The representations received on the consultation draft Trowbridge Bat Mitigation Strategy (TBMS) SPD;
 - A summary of the main issues from the consultation; and how
 - A statement setting out how the main issues have been addressed by the Council.

Structure of this document

- 1.4. Chapter 3 lists the various ways by which the Council consulted upon the draft TBMS SPD.
- 1.5. Chapter 4 provides a breakdown of the number of representations received.
- 1.6. Chapter 5 summarises the main issues arising from the representations along with the Council’s response and proposed actions where necessary.
- 1.7. Chapter 6 provides the overview of the schedule of changes to be made to the draft TBMS and the next steps.
- 1.8. Appendix A provides a list of submitted representations.
- 1.9. Appendices B - D contains the consultation adverts and notices used for the consultation.

3. Consultation Methodology

2.1. The Council undertook consultation in line with its Statement of Community Involvement (July 2015)¹ and Regulation 12 of the Town and County Planning (Local Planning) (England) Regulations 2012. The Council advertised the draft Trowbridge Bat Mitigation Strategy – Supplementary Planning Document (TBMS SPD) and made it available for comment as follows:

- An advert was published in the local newspapers (i.e. The Wiltshire Times) that circulate in the area affected by the draft TBMS SPD (published week commencing 18 February 2019). A copy of which is in **Appendix B**.
- An article was placed in the town and parish newsletter (week commencing 14th February 2019). A copy of which is in **Appendix B**.
- Targeted (email/letter) notifications were sent to relevant town and parish councils, neighbouring planning authorities, landowners, infrastructure providers, statutory bodies and other advisory bodies, voluntary organisations and local interest groups. This letter is contained in **Appendix C**.
- Information was published on the planning policy page of Wiltshire Council's website² to direct consultees to the consultation portal where documents could be viewed and comments could be submitted. This webpage is contained in **Appendix D**.
- There was an exhibition in the Atrium of County Hall, Trowbridge on the 26th February and the 28th February 2019 for members of the public or stakeholders who wished to learn more about the draft TBMS SPD and thereby provide an opportunity for questions to be asked as well as how to submit comments.
- Comments were accepted by post, email and online via the Council's consultation portal.

2.2. The following consultation materials were provided:

- A draft of the 'Trowbridge Bat Mitigation Strategy Supplementary Planning Document - Draft for Consultation, February 2019'.
- Representation Form and guidance note (Word Version).
- A final version of the Trowbridge Recreation Strategy and Visitor Surveys (November 2018)³.

2.3. The consultation exercise undertaken by the Council has provided meaningful engagement with what the Regulations and Wiltshire's SCI define as 'specific' and 'general consultation' bodies in accordance with the guidance set out in the

¹ Wiltshire Statement of Community involvement can be found on the following link:

<http://www.wiltshire.gov.uk/statementofcommunityinvolvement.htm>

²

https://wiltshire.objective.co.uk/portal/spatial_planning/spds/trowbridge_bat_mitigation_strategy_spd/the_trowbridge_bat_mitigation_strategy_spd

³ <https://wiltshire.objective.co.uk/file/5282201>

National Planning Policy Framework (NPPF)⁴ and the Planning Practice Guidance (PPG)⁵. This has included the 'prescribed bodies' and neighbouring local planning authorities, as required by the general duty to cooperate requirement.

4

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

⁵ <https://www.gov.uk/government/collections/planning-practice-guidance>

3. Representations

- 3.1. The Council contacted 828 consultees for comment overall. Of those consultees 649 were contacted by email and 122 by post. A copy of the letter / email sent to consultees can be found in **Appendix D**. In all, the council received representations from 37 different individuals or organisations.
- 3.2. Figure 3.1 illustrates the breakdown of type of respondent from the 37 representations. As the figure shows, the majority of respondents were the general public and landowners and developers. Trowbridge Town Council, statutory bodies and advisory bodies, local interest organisations, consultants and infrastructure providers also submitted representations.

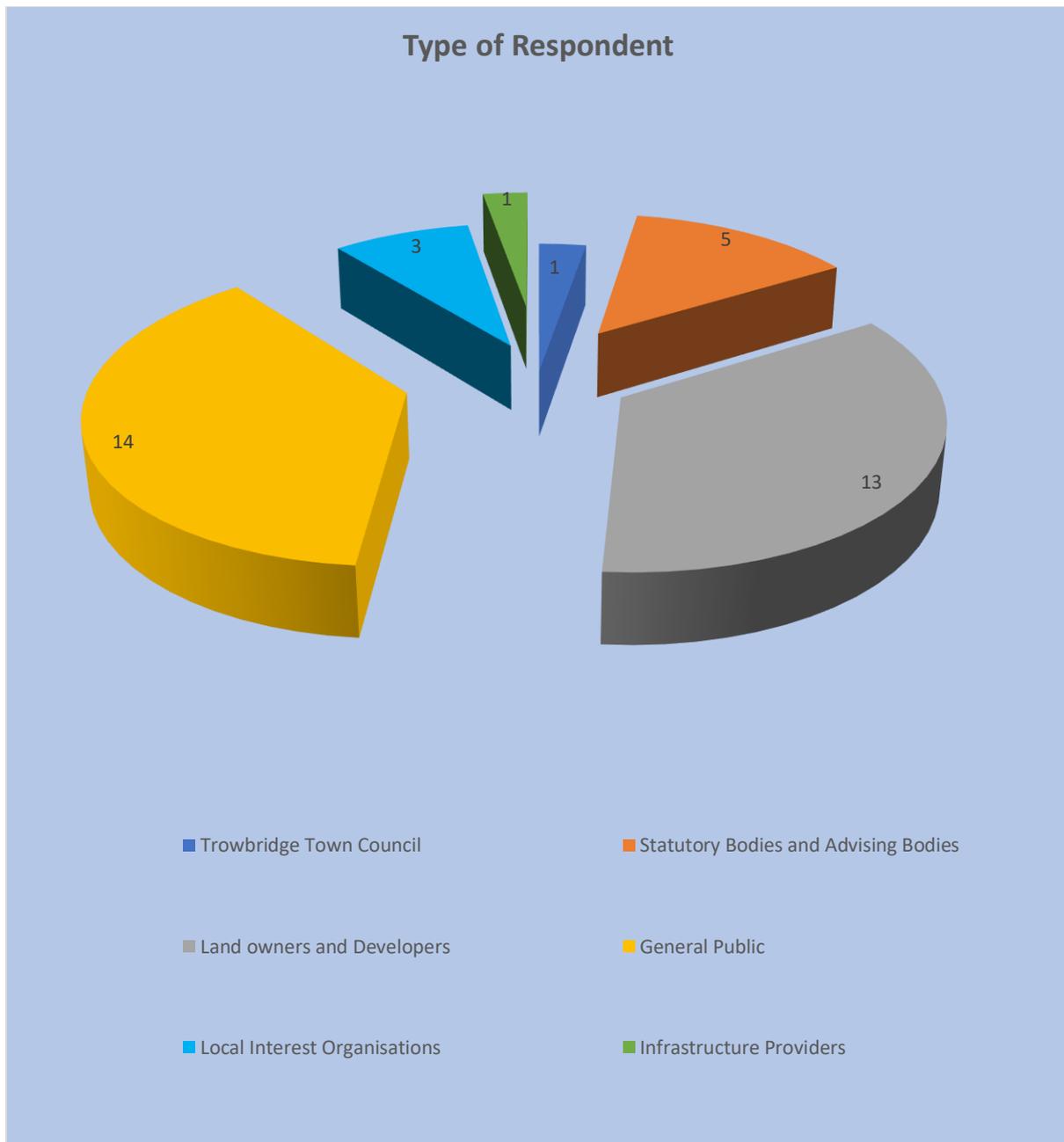


Figure 3.1. Number of representations by category of respondent

4. Draft Trowbridge Bat Mitigation Strategy - Supplementary Planning Document - summary of main issues raised through representations

- 4.1. The following section summarises the main issues raised by those who submitted representations. Each of the main issues raised has been considered in detail and a response provided that has informed how the draft TBMS SPD has been amended. Issues raised by Natural England, Trowbridge Town Council and Friends of Southwick County Park, landowners, developers and statutory bodies and other advisory bodies have been summarised. However, a full summary of responses received can be found in **Appendix A**.

Natural England

- 4.2. Natural England's overall position is that they support the TBMS. They consider it to be proportionate, in terms of survey requirements and the approach to on-site and off-site mitigation. Moreover, they are confident that the Strategy ensures a high level of certainty that development, when considered in combination, will not lead to a poorer habitat for bats.
- 4.3. However, Natural England would welcome assurances that there will not be a long lag-time between development occurring and mitigation being implemented. It also advises a factual amendment to confirm the Bechstein's bat population at Trowbridge is one of the largest in the UK.

The Council's Response

- 4.4. To address the issue raised by Natural England about minimising the lag between development and mitigation being in place, wording has been incorporated into the TBMS to confirm the timescale for appointing the Project Officer to administer the funds received through planning permissions. This officer will liaise with Natural England to secure an acceptable programme of mitigation measures. will be appointed and that the officer will agree implementation milestones with Natural England. The illustrative plan should also be amended to reflect the size of the Bechstein's population at Trowbridge.

Friends of Southwick Country Park

- 4.5. Friends of Southwick Country Park (FSCP) expressed concern that the increased recreational use of the Park will have a negative effect on its ecological value and that the sites value for Bechstein's bats will be degraded which is contrary to the Habitats Directive. The County Park is not yet designated as a Local Nature Reserve (LNR) because the process is still ongoing. As a result, FSCP and other consultees believe that its ecological importance has been overlooked in the TBMS.
- 4.6. The FSCP suggest that a Suitable Alternative Natural Greenspace (SANG) is identified and created now in order to take the pressure off the County Park. FSCP would like to see a dog park created elsewhere and the rights of way

network improved as well as improved parking facilities, access and signage to the Country Park.

The Council's Response

- 4.7. Although a full account of the Country Park's ecological value is outside the scope of the TBMS, a reference has been made in the final version of the TBMS to the Park's biodiversity in general, including its value for SAC bats and the Council's intention to designate it as an LNR. Developer contributions will be used to ensure that the increased recreational pressure will be absorbed in the Park without causing negative effects to biodiversity in the Country Park. The Strategy has costed the 'worst-case' scenario for bats which gives flexibility for achieving the best overall outcome. The role the Park will play in helping support the objectives of the TBMS will be further investigated and clarified when the Project Officer is in post.

Trowbridge Town Council

- 4.8. Trowbridge Town Council suggested more clarity is required on the definition of buffer zones, core habitat and terms such as - 'a wide swathe' of land. It has also been pointed out that if Zones A and B in Figure 6 are taken together the minimum width of core bat habitat would be 30m. This could mean some allocations are not deliverable. The Town Council also raised the issue of clarity as to why the three zones (red, yellow and grey hatched) do not seem to follow either the settlement boundary or the community area but rather both.
- 4.9. Further clarification of what is required by different types of planning application is needed. There have been a few references regarding the different requirements for different types of planning application. The representation suggests a summary of the different requirements in a table format as consultees refer to different requirements, e.g. for lighting and green space.

The Council's Response

- 4.10. In response to Trowbridge Town Council's concerns, the final version of the TBMS clarifies key terms such as 'core bat habitat'. Figure 6 has been reviewed and clarified to overcome ambiguities and thereby provide greater precision for the user of the document. The sensitivity zones and buffer zones themselves have been designed using data from visitor surveys and bat records. Whilst the evidence is considered to be robust it is difficult to 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.
- 4.11. Further clarification of what is required by different types of planning application is needed and the representative suggests a summary of these could be provided in a table.
- 4.12. To address this a new sub-section has been added to summarise the submission requirements for planning. This includes a table which identifies the requirements for Outline, Full, Reserved Matters and Householder planning applications.

Ecological Consultants and Local Interest Groups

- 4.13. Ecological consultants such as, Engain and Aspect Ecology as well as local interest groups - CPRE West Wilts and White Horse Alliance have raised concerns that the TBMS is not capable of mitigating indirect or direct adverse effects on bat habitats. They have stated there is insufficient evidence to provide certainty that mitigation set out in the Wiltshire Housing Site Allocations Plan will be effective, thereby calling into question the degree to which the Plan and Strategy is compliant with the Habitats Directive.
- 4.14. The destruction of 'important features' is an issue that has been raised by several consultees, referring to the destruction of hedgerows and the inability of the TBMS to fully mitigate the effects. One consultee has suggested that ancient hedgerows should be properly referred to as 'important hedgerows' in the TBMS. It has been suggested that a map to show the ecological networks of Trowbridge would be beneficial, to help ensure green corridors and biodiversity are maintained or improved.

The Council's Response

- 4.15. Natural England and Wiltshire Council are confident that the WHSAP will be delivered effectively and therefore avoid impacts. Indeed, a number of responses support 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 15m buffers and 100% habitat loss mitigation, have been put into place to ensure that effects are minimised. The Council believes this is sufficient to address issues raised by ecological consultants, local interest groups and members of the public about the achievability of the strategy.
- 4.16. 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 the site as a whole, habitat continuity is maintained. In-combination impacts will be mitigated offsite through S106 contributions to the Council mitigation scheme for residual and in-combination effects.

Developers

- 4.17. 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 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.

- 4.18. The Ashton Park Strategic Site 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.

The Council's Responses

- 4.19. 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.
- 4.20. Having considered all representations, the Council considers 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 and this position is supported by Natural England. The TBMS aims to increase availability of access and recreation for the town.
- 4.21. Clarity has been provided in the TBMS confirming that no further mitigation is required in relation to Ashton Park in view of its specific, detailed and approved mitigation strategy plan. In addition, greater emphasis is provided to highlight the policies set out in the WHSAP covering the allocations at Trowbridge and the mitigation measures that will be required.
- 4.22. Figures 4 and 5 have been altered to reflect the fact that the Strategy does not need to provide mitigation for Ashton Park as this scheme has its own bespoke mitigation arrangements.

5. Draft Trowbridge Bat Mitigation Strategy Supplementary Planning Document – Proposed changes from 2019 consultation

- 5.1. Table 5.1 below contains a list of proposed changes to the 'Trowbridge Bat Mitigation Strategy Supplementary Planning Document - Draft for consultation, February 2019' which are supported through the consultation feedback, which can be in **Appendix A**.

Table 5.1. Draft Trowbridge Bat Mitigation Strategy – Schedule of changes from the representation responses from the consultation.

<u>Reference within original document (Feb 2019)</u>	<u>Schedule of Changes</u>
Paragraph 1.10	Amendment to the text to provide clarity on the status of the yellow zones - <ul style="list-style-type: none"> • <i>'YELLOW ZONE – <u>permission only likely to be granted in accordance with the development plan for Wiltshire</u>'</i>
Figure 1	Amendment - <ul style="list-style-type: none"> • Flow chart shade toned down to make it easier to read the text.
Paragraph 2.1.3	Amendment to the text to remove the reference to the distance between ringing records in the SAC and woodland. <ul style="list-style-type: none"> • <i>'The meta-population of Bechstein's bats has been shown to be functionally linked to the Bath and Bradford on Avon Bats Special Area of Conservation (SAC) located <u>approximately 6.4km</u> to the north west (see Figure 2).'</i>
Paragraph 2.1.3	Draft text – <ul style="list-style-type: none"> • <i>'Figure 1 also illustrates the location of the allocations proposed in the Wiltshire Housing Site Allocations Plan in the context of the SAC and woodlands.'</i> Amended Text – <ul style="list-style-type: none"> • <i>'Figure 2 also illustrates the location of the allocations proposed in the Wiltshire Housing Site Allocations Plan in the context of the SAC and woodlands.'</i>
Paragraph 24	Amendment to the text to add a sentence to the bottom of paragraph 24 to emphasise that no further mitigation is required for Ashton Park. <ul style="list-style-type: none"> • <i>'As a consequence, no further mitigation is required over and above the bespoke mitigation scheme already proposed for Ashton Park as secured by the section 106 agreement for that development.'</i>
Paragraph 47	Amendment to the text to add new paragraph after paragraph 47 to define 'core bat habitat'. <ul style="list-style-type: none"> • <i>'Throughout this document the term 'core bat habitat' is used to <u>distinguish habitat which has been shown through surveys, or is otherwise assumed, to be preferred by one or more of the SAC bat species and which is therefore being retained, protected and buffered in accordance with this strategy. It also refers to habitat which is proposed to be created as a mitigation or enhancement for SAC species. 'Bat habitat' is used more broadly to refer to any habitat which may be used by any species of bats.'</u></i>

Reference within original document (Feb 2019)	Schedule of Changes
Paragraph 57	<p>Amendment to the text to add references.</p> <ul style="list-style-type: none"> • <i><u>'Cohen, K. (2017). Castlemead s.106 Ecology Monitoring Report: Green Lane & Biss Woods 2016.</u></i> • <i><u>Cohen, K. (2018). Castlemead s.106 Ecology Monitoring Report: Green Lane & Biss Woods 2017.</u></i> • <i><u>Cohen, K. (2019). Castlemead s106 Ecology Monitoring Report 2018 surveys: Green Lane and Biss Woods'</u></i>
Paragraph 61	<p>Amendment to the text to add a reference.</p> <ul style="list-style-type: none"> • <i><u>'Radio-tracking studies have recorded Bechstein's bats switching roosts every 2-3 days (Schofield and Morris, 2000) although results of radio-tracking at Green Lane Wood suggest the maternity can remain in the roost for longer (Cohen 2017, Cohen 2018, Cohen pers. comm.).'</u></i>
Paragraph 67	<p>Amendment to the text to add a reference.</p> <ul style="list-style-type: none"> • <i><u>'That Bechstein's bats forage beyond the confines of the roost woodland, utilising the wider landscape, has been replicated by a number of recent radio tracking studies (e.g. Palmer et al., 2013 in Worcestershire and Cohen 2017, 2018, 2019 in Trowbridge).'</u></i>
Paragraph 69	<p>Amendment to the text to add a reference</p> <ul style="list-style-type: none"> • <i><u>'However, radio-tracking studies in <u>Wiltshire (Cohen 2017, 2018, 2019) Dorset (Schofield and Morris, 2000), the Isle of Wight (Ian Davidson-Watts, pers.comm.), and Worcestershire (James Hitchcock / Eric Palmer, pers. comm.)</u> have reported observations of bats moving directly across open fields or farmland when travelling from, or returning to, roost sites and foraging areas.'</u></i>
Paragraph 70	<p>Amendment to the text to add a reference.</p> <ul style="list-style-type: none"> • <i><u>'In addition, a number of studies in the UK have recorded Bechstein's bats crossing roads, including the A422 in Worcestershire (Palmer et al., 2013) and the A350 in Trowbridge (Cohen 2017, 2018, 2019).'</u></i>
Paragraph 76	<p>Amendment to the text to add a reference.</p> <ul style="list-style-type: none"> • <i><u>'The majority of these were located within woodland blocks, however, some day roosts were recorded outside the main woodlands, the most notable of which comprised a hedgerow tree located some 500m north of Green Lane Wood (with 100+ bats recorded emerging in 2016) (Cohen, Castlemead s.106 Ecology Monitoring Report: Green Lane & Biss Woods 2016, 2017)'</u></i>
Paragraph 76	<p>Amendments to the text to update the status of the Bechstein's bat maternity colony to reflect their importance.</p> <ul style="list-style-type: none"> • <i><u>'On this basis, all of the sub-colonies are considered likely to form one large and semi-linked meta-population across the local area and the local population is conjectured to be between 350 and 700 bats (Aspect Ecology, August 2017). Natural England has confirmed that this is one of the largest known Bechstein's breeding populations in the UK and on this basis is currently considering whether to notify the woodlands as SSSI's.'</u></i>
Paragraph 96	<p>Amendments to the text add a reference to the 2017 to monitoring surveys.</p>

Reference within original document (Feb 2019)	Schedule of Changes						
	<ul style="list-style-type: none"> • <u>'The recent finding near Green Lane Wood of a ringed lesser horseshoe bat ringed during swarming surveys at Gripwood in Bradford-on-Avon (referenced in Cohen, 2017), suggests there may be a functional link between the SAC and woodlands around South Trowbridge for lesser horseshoe bats.'</u> 						
Paragraph 117	<p>Amendment to the text add a reference to the Bat Roosts in Trees methodology under surveys aimed at Bechstein's bats and to demonstrate that all roosts and unoccupied potential roosts are potentially important.</p> <ul style="list-style-type: none"> • <u>'Where trees are at risk, tree surveys should follow the Bat Roosts in Trees methodology (BTHK, 2018) Any such trees should be subject to endoscope surveys potentially with multiple inspections over the year given the well-known low encounter rates of bats using tree roosts and climbing surveys, as relevant, by an appropriately licensed bat ecologist. Further emergence and re-entry surveys of affected trees may be required, and early consultation with Wiltshire Council is advised to agree the full scope of tree surveys. Unoccupied potential roost features are as important as occupied features.</u> 						
Table 2	<p>Amendment to text to –</p> <ul style="list-style-type: none"> • change Table 2 to demonstrate that the strategic Allocation are Trowbridge will not contribute to the TBMS as a bespoke mitigation strategy will be secured by S106 and condition. • refer to the use of 'an appropriate metric agreed with the Council'. • Add a footnote to the clarify that the Ashton Park strategic allocation is excluded. • Table 2 Bat Habitat Sensitivity Zones <table border="1" data-bbox="395 1285 1423 1919"> <thead> <tr> <th data-bbox="395 1285 595 1453">Level of Impact/ Risk</th> <th data-bbox="603 1285 1018 1453">Type of Impact/ Risk⁶</th> <th data-bbox="1026 1285 1423 1453">Implications for development</th> </tr> </thead> <tbody> <tr> <td data-bbox="395 1464 595 1919"> RED ZONE HIGH RISK (See Figure 4) </td> <td data-bbox="603 1464 1018 1919"> Impacts will arise as a result of: Recreational pressure on woodlands used by breeding Bechstein's bats Loss of habitat of critical importance to supporting breeding Bechstein's bats Impacts will arise from developments considered alone and/or in-combination with other plans and projects </td> <td data-bbox="1026 1464 1423 1919"> <u>Habitat within the red zone is likely to be critical now and / or in the future to sustain this breeding population of Bechstein's bats.</u> It is unlikely that development in this zone will be able to provide <u>adequate</u> mitigation to enable an assessment under the Habitats Regulations to conclude, beyond reasonable </td> </tr> </tbody> </table>	Level of Impact/ Risk	Type of Impact/ Risk ⁶	Implications for development	RED ZONE HIGH RISK (See Figure 4)	Impacts will arise as a result of: Recreational pressure on woodlands used by breeding Bechstein's bats Loss of habitat of critical importance to supporting breeding Bechstein's bats Impacts will arise from developments considered alone and/or in-combination with other plans and projects	<u>Habitat within the red zone is likely to be critical now and / or in the future to sustain this breeding population of Bechstein's bats.</u> It is unlikely that development in this zone will be able to provide <u>adequate</u> mitigation to enable an assessment under the Habitats Regulations to conclude, beyond reasonable
Level of Impact/ Risk	Type of Impact/ Risk ⁶	Implications for development					
RED ZONE HIGH RISK (See Figure 4)	Impacts will arise as a result of: Recreational pressure on woodlands used by breeding Bechstein's bats Loss of habitat of critical importance to supporting breeding Bechstein's bats Impacts will arise from developments considered alone and/or in-combination with other plans and projects	<u>Habitat within the red zone is likely to be critical now and / or in the future to sustain this breeding population of Bechstein's bats.</u> It is unlikely that development in this zone will be able to provide <u>adequate</u> mitigation to enable an assessment under the Habitats Regulations to conclude, beyond reasonable					

⁶ Note that impacts arising from the Strategic Allocation for Trowbridge have already been addressed through a bespoke mitigation strategy and no further mitigation is required for this allocation.

Reference within original document (Feb 2019)	Schedule of Changes		
			scientific doubt, no adverse effect on the integrity of the SAC.
	<p>YELLOW ZONE</p> <p>MEDIUM RISK</p> <p>(See Figure 4)</p>	<p>Impacts will arise on individual sites and in-combination with other development as a result of: Loss and/or degradation of habitat of importance to Bechstein's, greater horseshoe and lesser horseshoe bats for foraging, commuting and roosting including:</p> <ul style="list-style-type: none"> • Buildings • Grassland • Hedgerows • Trees • Scrub • Water bodies • Riparian corridors • Availability/access to roosts 	<p>Development on greenfield sites outside the settlement boundaries will be able to demonstrate no adverse effect on site integrity of the SAC provided that:</p> <p>100% mitigation is provided for habitat loss within the allocation site boundary <u>as demonstrated by use of an appropriate metric agreed with the Council.</u></p> <p>Retained core bat habitat remains connected to the wider habitat network and is adequately buffered in accordance with this strategy.</p> <p>Core bat habitat remains relatively undisturbed by the effects of urbanisation in accordance with this strategy.</p> <p>A financial contribution is made towards funding the LPA scheme in Appendix 1 for mitigating residual in-combination effects from loss / degradation of bat habitat.</p>

Reference within original document (Feb 2019)	Schedule of Changes		
	GREY HATCHED ZONE MEDIUM RISK (See Figure 5)	Impacts will arise in-combination with other development as a result of: Recreational pressure on woodlands used by Bechstein's bats	Residential development will be able to demonstrate no adverse effect on site integrity of the SAC provided that: Funding being collected via CIL towards the LPA scheme in Appendix 2 for mitigating residual in-combination effects from recreational pressure.
Table 3	Amendments to the text to outline the data comprised to assess critical habitat. <ul style="list-style-type: none"> Table 3 Criteria applied to derive bat recreational sensitivity zones 		
	Level of Impact/Risk RED ZONE HIGH RISK (See Figure 4)	Criteria This includes land within 600m of identified woodlands containing core roosts. The Footprint Ecology Report (Footprint Ecology, November 2018) showed that the woodland bat sites draw visitors on foot for a radius of around 600m; beyond this, visit rates reduce to a low and constant rate. Any new residential development within the 600m radius is likely to increase foot visitors to the woodlands and therefore increase recreational pressure within the woodland. Recreational pressure is already being shown to have negative impacts to the woodland site, including the bat populations, so any additional incremental residential pressure would have an adverse impact on the integrity of the Bath and Bradford on Avon Bat SAC. Records within the GIS database <u>and contained in reports submitted to comply with the S106 agreement for Castlemead</u> , show that habitat within the red zones comprises critical habitat within the core foraging and feeding ground ranges associated with Bechstein's maternity roosts providing key resources now and / or in the future, in part compensating for limitations in the core woodland habitat.	

Reference within original document (Feb 2019)	Schedule of Changes	
	<p>YELLOW ZONE MEDIUM RISK (See Figure 4)</p>	<p>This zone is a composite of:</p> <p>A 1.5km buffer around 'Core Roosts⁷.' for the Bechstein's breeding population in the Trowbridge area, including Green Lane Wood, Biss Wood and Picket and Clanger Wood. These buffers are referred to as 'Core Areas' in the Wiltshire Bat SAC Guidance page 7, section 3.2 (Wiltshire Council, September, 2015) 'Core Areas' are of particular importance for foraging and commuting bats associated with the 'Core Roosts'.</p> <p>A 4km buffer around 'Core Roosts' for greater horseshoe bats and a 2km buffer around 'Core Roosts' for lesser horseshoe bats where these overlap with the Trowbridge Community Area.</p> <p>Key commuting corridors which link the above-mentioned Core Areas with the SAC which lies beyond the Trowbridge Community Area. These include: the River Biss and railway line through Trowbridge; the area known as the Hilperton Gap in north Trowbridge; land to the south west of Trowbridge and; land to the north east of Trowbridge. Evidence comes from radio tracking and verified records of Annex 2 species found in this locality.</p> <p>This zone is relevant to development at new greenfield sites and as such excludes existing urban areas as defined by settlement boundaries.</p> <p>Note that the Wiltshire Bat SAC Guidance is subject to review and this zone will need to be reconsidered if 'Core Areas' are amended in the light of new scientific information.</p>
	<p>GREY HATCHED ZONE MEDIUM RISK (See Figure 5)</p>	<p>The Footprint Ecology Report has identified the zone of influence within which new residential development is likely to result in increased recreational use of the woodland bat sites. As a minimum, the Footprint Ecology Report states that (para 6.46) the outer limit of the zone of influence should comprise the settlements of Trowbridge and Westbury. For areas outside the settlement boundary, the zone from which 75% of visitors originate has been mapped in accordance with recommendations in the Footprint Ecology Report (which comprises 3.356km for Clanger and Picket Wood and 2.656km for Green Lane Wood).</p>
<p>Paragraph 141</p>	<p>Amendment in the text to add clarity to what a Master Plan must outline.</p> <ul style="list-style-type: none"> • <i>'The Site Masterplan will demonstrate how the development proposals could be delivered in light of those constraints. <u>In particular it will demonstrate that sufficient land can be set aside for habitat to mitigate</u></i> 	

Reference within original document (Feb 2019)	Schedule of Changes
	<i>for 100% of the land lost to the development footprint. Outline planning permission, if granted, will be subject to compliance with the PP.'</i>
Paragraph 148	<p>Amendment in the text to clarify that the text refers to the allocations only</p> <ul style="list-style-type: none"> • <i>'It is expected that all direct and indirect impacts on bat habitat <u>lying within the allocations</u> will be mitigated within the respective allocated site. It is expected that core bat habitat will be retained and reinforced and enhanced as dark zones to retain connectivity for bats in the landscape. The most important general principle is that wide swathes of land are required to be set aside as core bat habitat in order to retain a permeable and functioning landscape for the target species. Development areas for each allocated site have been estimated as set out in Table 4 below. For each allocated site, it is anticipated that in most circumstances the full residual green space will be required for mitigation. <u>Dark buffer zones may be used for hard and soft landscaping provided that this use does not compromise the functioning and maintenance of the core bat habitat It protects.'</u></i>
Paragraph 152	<p>Amendment in the text to clarify the approach to mitigate the breaching of hedgerows.</p> <ul style="list-style-type: none"> • <i>'Hedgerows act as commuting structures, foraging habitat and provide feeding perches for horseshoe bats and probably for Bechstein's bat. Priority should be given to enhancing existing hedges, particularly ancient hedges, through planting up gaps and implementing improved management regimes for the long-term. Methods for restoration of hedgerows such as coppicing or laying must be specified in detail. <u>The breaching of some hedgerows will be unavoidable, but mitigation will need to ensure that across the site as a whole, habitat continuity is maintained. Mitigation for individual hedgerows should be proportionate to their importance for bats. Residual in-combination impacts will be mitigated offsite through S106 contributions to the Council's bat habitat mitigation scheme.'</u></i>
Paragraph 173	<p>Amendment to text to make reference to baseline lighting levels</p> <ul style="list-style-type: none"> • <i>'It is critical that the bat habitat zone (Zone A) is maintained in 'completely dark' conditions, defined as < 0.2 lux on the horizontal plane and less than 0.4 lux on the vertical plane (measured at 1.5m and 4m) (Bat Conservation Trust and Institution of Lighting Professionals, 2018). There must be no glare impact from the development within this zone. <u>Where baseline levels are above the lux levels stated here, the development design should ensure there is no increase above existing background light levels and ideally, where possible, reduce these towards completely dark conditions.'</u></i> •
Paragraph 196	<p>A new paragraph after paragraph 195 to summaries the requirements for planning.</p> <ul style="list-style-type: none"> • <i>'<u>8.3.5 Summary of Submission Requirements for Planning</u></i>

Reference within original document (Feb 2019)	Schedule of Changes																													
	<p><i>196. Under the Habitats Regulations 2017 (as amended) the planning authority is required to undertake an appropriate assessment before issuing planning authorisations. Developers will therefore need to satisfy TBMS requirements at each stage of the planning process. In the time between granting outline permission and submission of reserved matters it is possible these requirements may change e.g. as a result of new survey or other evidence becoming available. All applications will be judged against the most up to date evidence available.'</i></p>																													
Table 4	<p>A new table to outline what is required of different planning application types.</p> <p>Table 4 Information required of different planning application types.</p> <table border="1" data-bbox="392 797 1422 1968"> <thead> <tr> <th data-bbox="392 797 608 853"></th> <th colspan="4" data-bbox="616 797 1422 853">Planning Application Type</th> </tr> <tr> <th data-bbox="392 864 608 931">Submission requirement</th> <th data-bbox="616 864 807 931"><u>Outline</u></th> <th data-bbox="815 864 1007 931"><u>Full</u></th> <th data-bbox="1015 864 1222 931"><u>Reserved Matters</u></th> <th data-bbox="1230 864 1422 931"><u>Householder</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="392 943 608 1290"><u>Seek pre-application advice</u></td> <td data-bbox="616 943 807 1290"><u>Helpful to establish whether the TBMS constrains the principle of development</u></td> <td data-bbox="815 943 1007 1290"><u>Helpful to establish the extent to which the TBMS will drive layout and design of the development</u></td> <td data-bbox="1015 943 1222 1290"><u>Helpful to establish whether changes have occurred in relation to the TBMS since planning permission was granted</u></td> <td data-bbox="1230 943 1422 1290"><u>Necessary if application lies in the Red Zone</u></td> </tr> <tr> <td data-bbox="392 1301 608 1514"><u>Bat surveys</u></td> <td data-bbox="616 1301 807 1514"><u>Yes</u></td> <td data-bbox="815 1301 1007 1514"><u>Yes</u></td> <td data-bbox="1015 1301 1222 1514"><u>Yes if more than 2 years since Outline / Full application approved</u></td> <td data-bbox="1230 1301 1422 1514"><u>Potentially yes depending on nature of the proposals</u></td> </tr> <tr> <td data-bbox="392 1525 608 1968"><u>Masterplan</u></td> <td data-bbox="616 1525 807 1968"><u>Yes, to cover the entire allocation. Indicative test layouts required to demonstrate housing numbers are compatible with constraints</u></td> <td data-bbox="815 1525 1007 1968"><u>Only if permission is being sought for part of a larger allocation / development site</u></td> <td data-bbox="1015 1525 1222 1968"><u>No</u></td> <td data-bbox="1230 1525 1422 1968"><u>No</u></td> </tr> </tbody> </table>						Planning Application Type				Submission requirement	<u>Outline</u>	<u>Full</u>	<u>Reserved Matters</u>	<u>Householder</u>	<u>Seek pre-application advice</u>	<u>Helpful to establish whether the TBMS constrains the principle of development</u>	<u>Helpful to establish the extent to which the TBMS will drive layout and design of the development</u>	<u>Helpful to establish whether changes have occurred in relation to the TBMS since planning permission was granted</u>	<u>Necessary if application lies in the Red Zone</u>	<u>Bat surveys</u>	<u>Yes</u>	<u>Yes</u>	<u>Yes if more than 2 years since Outline / Full application approved</u>	<u>Potentially yes depending on nature of the proposals</u>	<u>Masterplan</u>	<u>Yes, to cover the entire allocation. Indicative test layouts required to demonstrate housing numbers are compatible with constraints</u>	<u>Only if permission is being sought for part of a larger allocation / development site</u>	<u>No</u>	<u>No</u>
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<u>Reference within original document (Feb 2019)</u>	<u>Schedule of Changes</u>				
	<u>Parameters Plan incorporating TBMS standards for habitat mitigation (section 8.2)</u>	<u>Yes</u>	<u>No</u>	<u>No</u>	<u>No</u>
	<u>Ecological Mitigation Plan</u>	<u>No</u>	<u>Yes</u>	<u>Yes</u>	<u>Potentially yes depending on nature of the proposals</u>
	<u>Baseline lighting surveys</u>	<u>Not usually, may be necessary where housing density suggests criteria may not be met</u>	<u>Yes</u>	<u>Yes if not provided in Outline application</u>	<u>Yes if standards in section 8.2 cannot be met</u>
	<u>Lighting Impact Assessment, including lux contour plots, in line with section 8.3 of TBMS</u>	<u>Not usually, may be necessary where housing density suggests criteria may not be met</u>	<u>Yes</u>	<u>Yes if not provided in Outline application</u>	<u>Yes if core bat habitat affected</u>
	<u>Construction Ecology Management Plan</u>	<u>No</u>	<u>Yes, may be deferred to condition if requirements are straightforward</u>	<u>Yes, may be deferred to condition if requirements are straightforward</u>	<u>Not usually</u>
	<u>Landscape and Ecology Management Plan</u>	<u>no</u>	<u>Yes, may be deferred to condition if requirements are straightforward</u>	<u>Yes, may be deferred to condition if requirements are straightforward</u>	<u>Not usually</u>

<u>Reference within original document (Feb 2019)</u>	<u>Schedule of Changes</u>
Paragraph 199	<p>Change to the text to include references to red and yellow zones.</p> <ul style="list-style-type: none"> • <i>'All habitat enhancement, restoration and creation must be <u>delivered within the red or EITHER within one of the yellow bat sensitivity zones OR within 1.5km of a yellow zone illustrated on the plan in Figure 4.</u></i>
Paragraph 228	<p>A new paragraph added to acknowledge that due to its existing ecological value Southwick Country Park is pursuing LNR status and as such mitigation will be required to absorb additional recreational use from new development.</p> <ul style="list-style-type: none"> • <i>'<u>While it appears Southwick Country Park offers good potential for attracting new visitors who might otherwise visit the woodlands, it should be noted the country park is of considerable biodiversity value in its own right. It contains sufficient biodiversity interest to qualify as a Local Nature Reserve and this statutory designation is being pursued by the Council and the Friends of Southwick Country Park with Natural England. The Country Park also has plenty of habitats suitable for foraging and commuting by all three SAC bat species. It has many older trees suitable for roosting by Bechstein's bats and this species was confirmed in a tree roost at the park in 2016. Southwick Country Park would be regularly used by householders in the three closest HASP allocations. Measures will therefore be required to ensure the additional pressure can be absorbed without presenting additional risks both to SAC bat species and other wildlife. The Council will discuss the best way to deliver these with the Friends of Southwick Country Park.</u></i>

Next Steps

- 5.2. This consultation has been prepared to address the legislative requirements relating to the preparation of supplementary planning documents. The representations received during the consultation process have been considered. Where necessary, officers have recommended changes to improve the clarity and effectiveness of the guidance set out with the Trowbridge Bat Mitigation Strategy – Supplementary Planning Document (SPD).
- 5.3. The final version of the Trowbridge Bat Mitigation Strategy SPD will be considered by Cabinet on 4 February 2020. Subject to Cabinet approval, a recommendation will be made to Full Council on 25 February 2020 for adoption of the SPD.
- 5.4. The final version of the Trowbridge Bat Mitigation Strategy SPD will be published on the Council's website at <http://www.wiltshire.gov.uk/planning-whsap>.

Appendix A - List of Consultation Responses

The table below contains a summary of responses to the consultation from individuals or organisations together with the Council's response and proposed actions.

All individual representations are available to view in full through the Councils online consultation portal <http://consult.wiltshire.gov.uk/portal>

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
1	Resident	Light pollution from development at Meridian Way roundabout badly affects bats from Biss Woods. Development at Little Common, North Bradley will be a serious threat to this important site.	The TBMS considers light pollution and provides appropriate measures to address the matter.	No change required
2	Resident	Land directly behind 11 Westbury Road (Allocation H2.2 in the Wiltshire Housing Site Allocation Plan) lies in the red zone, which makes proposals for housing in that location void.	The red zone, as mapped, does not include any land in the allocation for H2.2 (Land off the A363 at White Horse Business Park).	No change required
3	Resident	Sites H2.4, H2.5, H2.6 currently lie within the yellow zone for habitat sensitivity of SAC bats. Will changes in the settlement boundary take these sites out of the yellow zone	There are currently no changes proposed to the settlement boundary in relation to the allocated sites. The requirements of the Trowbridge Bat Mitigation Strategy will need to be met for the allocations, based on their location in the yellow zone.	No change required

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
		Southwick Country Park (SCP) is being progressed as a Local Nature Reserve (LNR) but designation is being delayed. Why is this?	This is being pursued by the Council's Legal and Countryside teams.	A new paragraph should be added after paragraph 228 to explain that Southwick Country Park is of biodiversity value and Local Nature Reserve (LNR) designation is being pursued.
		Why, given its ecological importance, was Southwick Country Park (SCP) chosen to mitigate the recreational pressure arising from it?	More recreational pressure is likely to be experienced at the Country Park and developer contributions will be used to ensure that this is absorbed without negative effects on biodiversity. The role that Southwick Country Park will play in delivering the Trowbridge Bat Mitigation Strategy will be further clarified at the delivery stage when the Project Officer is in post.	A new paragraph has should be added after paragraph 228 to explain the ecological importance of the Country Park and how any impact will be mitigated.
		Why can't H2.4 Church Lane be used as a Suitable Alternative Natural Greenspace (SANG)?	This site has been allocated for housing and as part of that a significant proportion is retained as green space. See Wiltshire Housing Site Allocations Plan for further information.	No change required
4	Resident	Statements expressing a range of opinions are made in respect of the effectiveness of the TBMS.	Comments noted.	No change required

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
		Is Wiltshire Council happy that proposals in the TBMS are ambitious or imaginative enough	Yes, the document has been prepared by a consultancy with specialist expertise in bats and mitigation delivery and with input from Natural England and local bat experts. Further refinements of the strategy will ensure it is fit for purpose. The mitigation is precautionary as required by the Habitats Regulations.	No change required
		The Trowbridge Bat Mitigation Strategy does not recognise the ecological importance of Southwick Country Park, anticipated Local Nature Reserve designation and the Friends of Southwick Country Park group	While a full account of the Country Parks ecological value is outside the scope of the Trowbridge Bat Mitigation Strategy, reference could usefully be made to the park's value for Special Area of Conservation bats.	A new Paragraph should be added after paragraph 228 that refers to Southwick Country Park's biodiversity value, the Friends of Southwick Country Park and the intention to progress a Local Nature Reserve designation.
		In the Document Revisions section the last revision makes reference to a map at Fig 1 which is not there.	There is an error in the text, the reference should be changed.	A change should be made to the Document Revisions Page so that reference is made to Fig 2 and not Fig 1.
		The referencing in Paragraph 2.1.3 to the allocations on the map is unclear	This can be made clearer in the final version of the TBMS.	On page 4, the last sentence in paragraph

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
		What are “allocation sites”	This is explained in paragraph 2.1.3.	2.1.3, should be changed to “Figure 2....”.
		Housing allocations for Trowbridge are too ambitious. There is evidence of public health issues in areas of higher housing densities	This is a matter for the Wiltshire Housing Site Allocations Plan and has been considered through the Sustainability Appraisal process. Additional public open space will be provided through the development of the allocated sites. Public health issues are not directly relevant to the ambit of the TBMS and yet the creation of new areas for recreation and bolstering existing will be matters for the Project Officer once appointed.	No change required
		In view of the level of detail required for lighting, it should not be acceptable to submit an outline application for development within the yellow zone that would likely lead to an increase in light generation.	For most outline applications, the potential impacts of lighting can be dealt with through a parameters plan, see paragraph 8.1.141 and Figure 6 in TBMS. In some situations, outline applications would need to be supported by further information and this can be determined through early consultation with the planning department, as recommended in the TBMS.	A new table should be inserted into a new section 8.3.5, summarising the requirements of each type of planning application.

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
		In paragraph 8.1.146 reference to section 6.1 is wrong.	Reference should be made to sections 8.2 and 8.3, not 6.1	Paragraph 8.1.146 should be changed to refer to Sections 8.2 and 8.3. Reference to Section 6.1 should be deleted.
		Delete reference to provision of outdoor gym facilities, as they are not used	This is one of a number of suggestions which will be explored and may be relevant at some sites more than others.	No change required
		The consultee has put forward ideas for new Suitable Alternative Natural Greenspace provision to reduce potential conflicts between users at Southwick Country Park.	These options can be considered along with others during the implementation stage of the TBMS by the Project Officer in conjunction with the planning team.	No change required
		The expectations of the TBMS in relation to planning applications would be onerous for developers of very small sites such as a single property.	All developers will be expected to comply with the TBMS in a proportionate way, depending on the nature and scale of development in question.	No change required
5	Southern Water	The TBMS will not affect Southern Water as the closest asset is over 30km away	No response required.	No change required
6	Natural England	TBMS is proportionate in terms of survey requirements and the	The Council will continue to engage with Natural England on the implementation of the TBMS.	Amendments to the text should be made to clarify the status of the Bechstein's bat maternity

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
		<p>approach to on-site and off-site mitigation.</p> <p>The strategy ensures a high level of certainty that development in aggregate will not become poorer for bats.</p> <p>Natural England wishes to see there is not a long lag between development occurring and mitigation being implemented. Once the Project Officer is in place, Natural England would wish to agree a reporting mechanism, so it can understand how the strategy is being implemented.</p> <p>Data suggests the size of the Bechstein's maternity colony at Trowbridge is one of, if not, the largest known in the UK. It would be good to confirm the status of the Trowbridge population.</p>	<p>The ecological importance of the Bechstein's bat colony at Trowbridge should be recognised and referenced in the strategy.</p>	<p>colony to reflect their importance.</p>
7	Resident	<p>Making Southwick Country Park more attractive for dog walking and café visitors is at odds with the site's importance as a place for nature and tranquillity.</p>	<p>The role that Southwick Country Park will play in delivering the TBMS will be further clarified at the delivery stage when the Project Officer is in post.</p>	<p>No change required</p>
9	Resident	<p>Section 8.2.2 – this paragraph suggests ancient hedgerows can be breached by developments. This</p>	<p>Regulation 6(1)(e) of the Hedgerows Regulations (1997), permits important hedgerows to be</p>	<p>No change required.</p>

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
		would be contrary to the Hedgerows Act 1997.	removed if required for the purpose of carrying out development for which planning permission has been granted or is deemed to have been granted.	
10	Resident	Ancient hedgerows should more properly be referred to as 'important' hedgerows to align with the Hedgerows Act.	The text is not intended to repeat the provisions of the Hedgerows Regulations 1997. It is expected that the planning authority will have considered the implications of development on important hedgerows in line with the provisions of the relevant Regulations.	No change required.
		While the Habitats Regulations Assessment and Natural England's responses require protection of hedgerows. The TBMS seems to allow for hedgerows to be grubbed out.	The breaching of some hedgerows may be unavoidable but where it is, mitigation will need to ensure that across the site as a whole, habitat continuity is maintained. In-combination impacts will be mitigated offsite through Section 106 contributions to the Council to deliver mitigation schemes for residual and in-combination effects.	No change required.
11	Resident	Recent losses of informal recreation space at Trowbridge and historical lack of funding for the Southwick Country Park, will combine with the	The role that Southwick Country Park will play in delivering the TBMS will be further clarified at the delivery stage when the Project	No change required.

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
		Plan to endanger the wildlife established there	Officer is in post. It is intended that Community Infrastructure Levy will be used to fund agreed measures.	
12		Initial funding for habitat mitigation measures will come from developers, Wiltshire Council may be reluctant to assume responsibility for long term maintenance costs?	Long term management will be considered as part of the planning application process for allocated sites e.g. this could be undertaken management companies.	No change required.
13	Trowbridge Town Council	<p>What is the justification for designating the whole of the Trowbridge settlement area as a Bat Sensitivity Zone but exclude parts of that from the Bat Recreational Sensitivity Zone but include the areas of Hilperton, North Bradley and Westbury and exclude parts of the Southwick settlement?</p> <p>Would a 3m radii not but sufficient to cover both Bath Sensitivity and Bat Recreational Sensitivity Zones?</p>	<p>The yellow and grey hatched zones are derived from different evidence bases. The recreational zone is based on data from the Visitor Survey 2017 which identified the distance from which 75% of visitors to the woodlands come. The habitat zone is based on bat records for the area, scientific research on the three bat species concerned and habitat data from aerial photographs. However, bat records are patchy as there is no uniform survey for the area, therefore a precautionary approach is taken to identifying this zone to ensure that less frequent but equally important migration routes are captured.</p>	No change required.
		Will the mitigation approach be used just for allocation sites or all sites in	Section 7.1, Tables 2 and 3 and Figures 4 and 5 explain how the	A new table should be inserted into a new

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
		<p>the zones, does it apply equally to all scales of development?</p>	<p>zones apply. The zones apply to all scales of minor and major development. Householder applications will largely fall outside the criteria except where significant amount of habitat is affected e.g. where there is an increase in the residential curtilage. Consideration will be given as to whether this can be clarified further.</p>	<p>section, 8.3.5 summarising requirements of each type of planning application.</p>
		<p>What is the definition of a “wide swathe”? If Zones A and B together are 30m wide, some of the WHSAP sites may not be able to achieve these requirements.</p>	<p>Figure 6 shows the buffer zones. Core bat habitat whether new or retained, must be buffered by a width of at least 15m at 1 lux or less from adjacent new development. This may comprise, for example, soft or hard landscaping, wildlife habitat, sustainable urban drainage systems or land providing a visual buffer for heritage assets. To qualify as core bat habitat, newly created habitat must be at least 15m wide. In addition, existing habitat can be bolstered to be at least 15m wide to qualify as core bat habitat.</p> <p>The requirement to mitigate habitat loss by 100% is likely to entail creating bat habitat which is wider</p>	<p>Figure 6 should be amended to make the image clearer, to improve the proportions and to make the text consistent with the rest of the document.</p>

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
			<p>than 15m, by for example creating bat habitat in the 15m wide buffer zones.</p> <p>Calculations indicate that there is adequate space to deliver the mitigation for the quantum allocated.</p>	
14	Resident	In paragraph 8.2, if hedgerows can be breached, this will nullify the mitigation proposed by the TBMS.	The breaching of some hedgerows may be unavoidable, but mitigation will need to ensure that across the site as a whole, habitat continuity is maintained.	No change required.
15	Savills	The TBMS was not well publicised.	The consultation has been carried out in line with statutory requirements and the Council's Statement of Community Involvement.	No change required.
		The TBMS does not sufficiently recognise that it will impair recreation and access to the countryside and provision of housing in the most appropriate areas of Trowbridge. The weight given to the strategy is disproportionate to the public's interests.	The strategy is considered to provide the minimum level of mitigation necessary to enable further development at Trowbridge to proceed without contravening the Habitats Regulations and this position is supported by Natural England. The strategy aims to secure new investment in measures to support access to recreation facilities for the town.	No change required.

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
		<p>There is no evidence to justify use of radii to define zones rather than bat flight routes. In particular, there is no evidence to support a radii of 600m for the red zone</p>	<p>The yellow habitat zone is based on bat records for the area, scientific research on the three bat species concerned (core sustenance zones) and habitat data from aerial photographs. However, bat records are patchy as there is no uniform survey for the area, therefore precautionary approach is taken to identifying this zone to ensure that less frequent but equally important migration routes are captured.</p> <p>The radius for the red zone is supported by evidence from radio-tracking showing bats are prepared to move at least 600m from the woodlands to find suitable maternity roosts. The report of the visitor survey undertaken by Footprint Ecology provides visit rate curves for those interviewees arriving on foot (Figure 4). This flattens out after 600m to a constant minimal rate. The aim of the strategy is to discourage frequent everyday use of the woods by locating housing beyond this critical minimum distance.</p>	<p>No change required.</p>

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
16	Campaign to Protect Rural England - West Wiltshire Branch	Campaign to Protect Rural England does not have confidence that the TBMS is capable of mitigating impacts on SAC bats. The TBMS contains insufficient evidence that the measures promoted will be effective. This raises doubts over whether the measures will be delivered and whether they can work. Campaign to Protect Rural England considers there are doubts over whether long term maintenance and monitoring will be achieved. What happens if it is shown that bat populations are falling?	Wiltshire Council and Natural England consider that the strategy will be delivered effectively and will avoid impacts. The strategy 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 including 15m buffers, 100% mitigation on site plus additional offsite provision are all achievable measures. Appropriate resources have been allocated including the appointment of a Project Officer to secure delivery and compliance. If bat populations are demonstrated to be falling and no natural cause can be found, it will not be possible to complete Appropriate Assessments for future developments without a plan to restore the population.	No change required.
17	Friends of Southwick Country Park	Para 9.2 Increased recreational pressure at Southwick Country Park would compromise its ecological value. New SANG would be preferable	TBMS will introduce measures to absorb the increase in recreational use at existing recreational sites without impacting wildlife and alternative SANGs will be provided if this approach is judged, through discussions, to not be adequate.	A new Paragraph should be added after paragraph 228 that refers to the Southwick Country Park's biodiversity value, the Friends of Southwick Country Park and the

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
18		Southwick not yet designated a Local Nature Reserve and Friends of Southwick Country Park are concerned that its acknowledged ecological importance is being overlooked in the TBMS which proposes that the site be managed primarily for access.	Three allocations are located close to Southwick Country Park and increased use would be inevitable. TBMS seeks to provide for these future residents through improvements which will include habitat enhancement measures. Proposals for improvements at Southwick Country Park should demonstrate these will not compromise its existing and future value for biodiversity.	intention to progress a Local Nature Reserve designation.
19		Increasing recreational use at Southwick Country Park will degrade the site's value for Bechstein's bats which is contrary to the Habitats Directive	Southwick Country Park is likely to be important for all 3 SAC bat species and therefore any proposals to increase access should demonstrate an overall enhancement for these species. Work's that require planning permission will be subject to Habitat Regulations Assessment.	
20		Create a dog park elsewhere. Improve rights of way network. Improve access, signage and parking to the above.	These alternatives will be considered at the delivery stage when the Project Officer is in post. Wiltshire Council will carry out informal consultations with Friends of Southwick Country Park over this matter	

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
21		Sites H2.4 and H2.5 currently lie within the yellow zone for habitat sensitivity of Special Area of Conservation bats. Will changes in the settlement boundary take these sites out of the yellow zone.	No, they will need to meet the requirements of the TBMS, based on their location in the yellow zone.	No change required.
22	Engain	General note of support for Trowbridge Bat Mitigation Strategy and its role in furthering the conservation of bats.	Support noted.	No change required.
23		Does paragraph 143 only refer to Full and Reserved planning applications? May be useful to have a table summarising the requirements for different types of planning applications?	Yes, a table could be inserted to clarify the requirements for different types of planning applications.	A table clarifying the requirements for each application type should be added into section 8.3.5
24		Paragraph 148 – Not all direct and indirect impacts on bat habitat can be mitigated within the site - e.g. recreational impacts on woodland.	First sentence could be clarified to make it clear that <u>only</u> mitigation for bat habitat needs to be provided within allocations	The first sentence of paragraph 148 should be amended to say “ <u><i>it is expected that all direct and indirect impacts on bat habitat within the allocations will be...</i></u> ”
	Paragraph 148 - Clarity needed on the meaning of 'core bat habitat'	Review terminologies to ensure there's no confusion. Core bat habitat is habitat shown to have been regularly used by	A definition of 'core bat habitat' should be added to the end of section 4.	

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
			SAC bat species and features providing connectivity in the landscape	
25		With reference to paragraph 150 and Figure 6, does the TBMS call for a 30m buffer from the edge of all core bat habitat?	See response to representation 13.	Figure 6 should be amended to make the image clearer, to improve the proportions and to make the text consistent with the rest of the document.
		It would be helpful if Figure 6 showed Zones B and A as the same width.	Zone A is wider to reflect the fact this is likely in many cases to be wider than 15m	Figure 6 should be amended to make the image clearer, to improve the proportions and to make the text consistent with the rest of the document.
26		Paragraph 152 - It may not be possible to fully mitigate for loss of functionality of breached hedgerows.	The breaching of some hedgerows may be unavoidable but, where it is mitigation will need to ensure that across the site as a whole, habitat continuity is maintained. Mitigation for individual hedgerows should be proportionate to their importance for bats. In-combination impacts will be mitigated offsite through S106 contributions to the Council's	The wording in paragraph 152 should be revised to clarify the approach to mitigating the breaching of hedgerows.

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
			mitigation scheme for residual and in-combination effects.	
27		Paragraph 173 provides no reference to existing baseline light levels. This is an important consideration which could compromise the ability of development proposals to meet the dark conditions as specified in this paragraph.	Developers will not be expected to reduce current light levels, unless these are within the developers control.	A reference should be made to baseline light levels at paragraph 173.
28		Para 176 – clarity needed on whether these lighting details are only relevant to Full and Reserved matters applications.	New table could be added to summarise the submission requirements for each type of planning application including those related to lighting.	New table should be inserted into a new section, 8.3.5, summarising requirements of each type of planning application.
29	Canal and River Trust	More detail required on survey methods for tree roosts as Bat Conservation Trust (BCT) guidance is not adequate.	Tree roost surveys are a snapshot which rarely detect bats - i.e. the absence of bats does not mean the tree has no potential for bats now, or in the future. In accordance with the precautionary principle it is assumed that all trees have potential for roosting Bechstein's either now, or in the future.	The use of the 'Bat Roosts in Trees Handbook' should be referenced as this is becoming industry best practice.
		The TBMS is overly focussed on breeding roosts with insufficient recognition of other roosts.	Whilst focus on breeding roost is justified, it is agreed that other roosts are important.	Changes should be made that demonstrates that all roosts and unoccupied

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
				potential roosts are potentially important.
		Paragraph 191 – all windows on site boundaries should be tinted down to 49% reflectivity to be most effective.	Figure 6 provides adequate guidance and stipulates the standard to be met.	No change required.
		Para 8.2.2 – is there a recommendation for more effective mitigation for breached hedgerows?	The breaching of some hedgerows may be unavoidable but where it is, mitigation will need to ensure that across the site as a whole, habitat continuity is maintained. Residual impacts will be mitigated offsite through S106 contributions to the Council's mitigation scheme for residual and in-combination effects.	No change required.
30	Woodland Trust	Pleased that Pickett and Clanger Woods are located in the red hatched zone	Noted.	No change required.
		The TBMS seems to be suggesting that the Trust will be actively required to implement a range of measures (detailed in section 9.2.1 "Recognising important bat woodlands as nature reserves")	The measures listed by the Trust will largely be implemented at Green Lane and Biss Woods through the S106 agreement associated with Ashton Park (see para 2.1.2).	No change required.
		Broad welcome for the document, particularly its emphasis on delivering mitigation at a landscape scale.	Support noted.	No change required.

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
		Specific welcome for measures in para 23, 29, 46, 197, Appendices 1 and 2.		
31	Wiltshire Wildlife Trust	Corrections, presentational and factual comments on the text on pages 4, 5, 9, 41, 213, 221, 225.	These will be reviewed in finalising the document	Corrections / clarifications should be made, as appropriate.
		The TBMS would benefit from a map showing the ecological networks around Trowbridge.	Such a map does not currently exist but is being developed as part of the Council's Green Infrastructure Strategy. Absence of such a map does not compromise the proposals or effectiveness of the TBMS.	No change required.
		Table 1 – include 2600 houses at Ashton Park.	These are already included in the indicative housing requirement of 6810.	No change required.
		Paragraph 23 – include map of coherent and linked landscape for bats.	Such a map does not currently exist but is being developed as part of the Council's Green Infrastructure strategy. Absence of such a map does not compromise the proposals or effectiveness of the TBMS.	No change required.
		Figure 3 shows Biss Barn Wood which has been felled, are there plans to replant it.	The land is in private ownership and was subject to an order from the Forestry Commission to replant it. However, this was	No change required.

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
			revoked on appeal and there are no plans for replanting at this stage...	
		Paragraph 128 – strengthen the wording “highly unlikely to be permitted” for critical parcels of land within the red zone to “will be refused”	It is expected that some types of householder development in the red zones would not cause adverse effects in Appropriate Assessment terms even in critical parcels.	No change required.
		Table 2 - is it intended that 100% mitigation for habitat loss should be based on the updated Defra biodiversity metric?	It is intended to use the beta version of the biodiversity metric, until it is finalised by Natural England when the final version will be used.	Wording will be amended to make reference to the Biodiversity Metric published by Natural England.
		Para 135 - review of bat sensitivity zones - how will this be undertaken, what are the monitoring proposals to feed into this?	<p>Reviews would be undertaken periodically as and when information becomes available through bat surveys / research and to be consistent with the evidence base used for Appropriate Assessment.</p> <p>Scheme of monitoring to be agreed once Project Officer in post (see paragraph 205).</p> <p>The issue of reviews is fully addressed in the wording of paragraphs 135 and 136 (to be revised to 136 and 137).</p>	No change proposed.

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		Paragraph 198 – it is not clear how the 6 ha of woodland has been calculated.	Professional judgement suggests a 5% increase in the area of existing woodland at Green Lane Wood and Biss Barn Wood would be broadly appropriate. This has been tested using the Defra metric. 5% = 6 ha of woodland which generates an uplift of approximate 1/3 of the Biodiversity Units which would be lost from the 35 ha of land lost to the footprint of the allocations in aggregate.	No change required.
		Wiltshire Wildlife Trust (WWT) has a strategic interest in land adjacent to land it currently owns. It would make sense to consolidate these with land purchased for mitigation.	Noted, the Council recognises WWT as a potential partner for mitigation delivery.	No change required.
		Is there a distinction between monitoring proposed at paragraph 206 and that proposed for Ashton Park	Yes, separate funding has been identified for each. Monitoring facilitated through the Project Officer for the TBMS will be funded through Community Infrastructure Levy. Ashton Park is to be funded through a S106 agreement linked to planning permission.	No change required.
		Appendix 1, Page 63 - Costed habitat mitigation calculates cost per house	Habitat mitigation measures are only relevant to greenfield	No change required.

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		based on allocation numbers of 1050 dwellings. However, paragraph 213 says there could be 2107 dwellings.	development - i.e. 1050 on the allocation sites. This is a minimum as there may be additional greenfield development coming through Neighbourhood Plans. It is expected that other housing will be delivered within settlement boundaries and is not therefore anticipated to impact on SAC bat habitat, therefore no S106 monies would be due.	
		A blanket zone of restraint (red hatched zone) is unnecessary. This should be changed to a consultation zone where applications are assessed on their merits.	There is good evidence from the Castlemead development and the visitor surveys that a zone of restraint needs to be imposed.	No change required.
32	Taylor Wimpey Aspect Ecology, Taylor Wimpey	The risk of recreational pressure should be assessed on the basis of travel distance for residents, not linear distance. Wiltshire Council accepted this latter approach for Ashton Park.	Footprint Ecology is the market leader for visitor studies in relation to protected areas which are vulnerable to recreational pressure. The Council has adopted their advice on what comprises the most appropriate measure to justify the red zone. The Appropriate Assessment (AA) for Ashton Park succeeded on the basis of significant changes to the scheme design and a wide-ranging package of mitigation measures. The in-combination AA	No change required.

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			<p>relied on what is now the TBMS to address residual and in-combination effects.</p> <p>A cornerstone of the Shadow Habitat Regulations Assessment undertaken by David Tyldesley Associates (DTA) for Ashton Park was that mitigation should not be contrived and should be robust for the lifetime of the development.</p>	
		<p>Most people who use the woods arrive by car therefore the red hatched zones will be ineffective. Recommendations are provided for an alternative approach to the TBMS based on a conversation with a professional ecologist.</p>	<p>Data from the Footprint Ecology report shows the majority of visitors to Green Lane Wood arrive on foot but all visitors to Pickett and Clanger Woods arrive by car.</p> <p>Recommendations noted. However, experience of Council Ecologists is that these do not offer the certainty required to enable Appropriate Assessments to conclude, no adverse effects beyond reasonable scientific doubt.</p>	No change required.
33	Resident	<p>Welcomes the strategy as it will provide greater confidence in determining planning applications which could impact the SAC</p>	No response required.	No change required.

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
34	Resident	Corrections, presentational and factual comments on the text in Section 1, Section 2	The many comments regarding references are welcomed. These will be reviewed in finalising the document.	Changes should be made to the text in Sections 1 and 2.
		Paragraph 57 – cannot find Bechstein’s Bat report on Council website.	The 2017 report by Aspect Ecology is contained within the Environmental Statement for the Ashton Park planning application unlike the earlier version which was a separate document.	No change required.
		Paragraph 61 – suggest adding references to most recent survey reports for Castlemead undertaken in 2017 and 2018	Reference to these would be useful. Monitoring reports completed in relation to Castlemead are now on the planning portal.	References to recent monitoring activity undertaken in respect of the Castlemead development should be added to TBMS.
		Paragraph 116 – the method proposed for tree inspections should be specified to include endoscopic surveys and multiple inspections over the year	Tree roost surveys are a snapshot which rarely detect bats i.e. the absence of bats does not mean the tree has no potential for bats now or in the future. In accordance with the precautionary principle, it is assumed that all trees have potential for roosting Bechstein’s either now or in the future.	Reference should be made to the ‘Bat Roosts in Trees Handbook’ methodology to provide greater clarity in respect of surveys aimed at Bechstein’s bats.

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		Figure 6 – various queries raised.	See response to representation 13.	Figure 6 should be amended to make the image clearer, to improve the proportions and to make the text consistent with the rest of the document.
		Paragraph 199 – why can't enhancement be provided in the red hatched zones	Enhancement can be provided in the red zones.	Paragraph 199 should be amended to include reference to yellow and red hatched zones.
		Housing now at a higher density than originally conceived. This will lead to detrimental effects on bats.	Whilst this is the case, increasing the density of housing on certain sites should not affect the ability to deliver the mitigation measures set out in TBMS.	No change required.
35	Resident	The mortality of bats attempting to cross Frome road should be taken into account.	The speed limit along the section of Frome Road that will be affected by new development is 30mph. Mortality rates involving traffic travelling at 30mph are expected to be low (see Environmental Statement and Habitat Regulations Assessment for Ashton Park, which is available on the Council's planning portal).	No change required.
		Site specific queries regarding the value of ecological features for bats	The TBMS is intended to provide mitigation for development on land	No change required.

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		on land behind Blind Lane (Southwick).	coming forward in the WHSAP, Neighbourhood Plans and rural exception sites. If land at Blind Lane comes forward as an allocation it will need to comply with the TBMS.	
		If as a result of the TBMS, Southwick Country Park is turned into a 'doggy theme park', this would potentially harm the park's wildlife, which includes Bechstein's bats. The focus for increased visitor pressure should be Biss Meadows	More recreational pressure will be experienced at the Country Park and developer contributions will be used to ensure that this is absorbed without negative effects on biodiversity. In accordance with the precautionary principle, the TBMS has costed a package of mitigation measures on a worst-case scenario. The role that Southwick Country Park will play in delivering the TBMS will be further clarified at the delivery stage when the Project Officer is in post.	A paragraph after 228 has been added to acknowledge that due to its existing ecological value, mitigation will be required to absorb additional recreational use from new development. The Council will discuss the best way to deliver this with Friends of Southwick Country Park.
		The provisions asset out within the TBMS are uncertain, untested and therefore ineffective.	The TBMS is a precautionary approach based on available bat and habitat evidence, professional interpretation, consultation with Natural England and input from local bat experts. It balances the planning need for housing against restricting growth in sensitive zones and securing S106 and CIL	No change required.

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			<p>monies to deliver new habitats and SANG measures. Experience from Castlemead shows additional governance to usual planning enforcement is required to secure the necessary woodland, scrub and grassland habitats which are otherwise not difficult to create.</p> <p>The test for AA is certainty as to the absence of adverse effects beyond reasonable scientific doubt, not beyond any doubt whatsoever.</p>	
36	White Horse Alliance	The red hatched zones are not adequate and development is already occurring in them.	The red hatched zones are supported by the evidence provided from bat surveys and visitor surveys.	Changes should be made to Table 2 and Figures 4 and 5 to demonstrate that the Strategic Allocation at Trowbridge will not contribute to the TBMS as a bespoke mitigation strategy will be secured by S106 and condition.
	Independent review prepared in support of the White Horse Alliance representation	Uncertainty exists over the effectiveness of the mitigation measures agreed as part of the Ashton Park scheme. Adding further habitat mitigation (as proposed by the TBMS) would not provide a level of	The new habitat types to be created are low risk - i.e. are readily created and reliance is not placed on bat houses over which evidence in terms of effectiveness is uncertain. The main aim of the	No change required.

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		scientific certainty that the integrity of the Bath and Bradford on Avon Bats SAC will not be compromised by future development.	TBMS is to safeguard and bolster foraging and commuting habitat. The TBMS supports the 6 greenfield sites allocated at Trowbridge within the WHSAP. If other greenfield sites are proposed through Neighbourhood Plans and/or the review of the Wiltshire Core Strategy they would need to be demonstrated to be acceptable through a separate Habitats Regulations Assessment.	
		Uncertainty over mitigation for addressing effects of recreational pressure.	The Council will work with local community, landowners and NGOs to identify suitable sites or measures for existing sites. This will start when a Project Officer is appointed.	No change required.
		Can't rely on compliance to deliver the mitigation.	Compliance worked at Castlemead once the problem came to Wiltshire Council's attention. One of the roles of the Project Officer will be to ensure compliance. .	No change required.
		If developers and promoters had been engaged directly before the strategy was published, concerns could have been raised informally.	The consultation process has enabled any matters to be raised and responded to.	No change required

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37	Persimmon Homes Wessex	<p>Add text to page 10 explaining why the requirements of the TBMS will not be applied to the Ashton Park site.</p> <p>The Ashton Park application boundary should be included on relevant plans.</p> <p>Remove Ashton park from relevant zones.</p>	<p>Paragraph 24 should be expanded to explain that Ashton Park has its own bespoke mitigation scheme, and its status reflected in Figures 4 and 5.</p>	<p>A sentence should be added to bottom of paragraph 24 to emphasise that no further mitigation is required for Ashton Park. Figures 4 and 5 should be amended to include the site.</p>
38		<p>Recommend including explanatory footnote to Tables 2 and 3 to exclude Ashton Park.</p> <p>Question the assertion that recreational pressure is having a direct impact on the bat population.</p>	<p>Agree it would be useful to clarify that the strategic allocation is excluded.</p> <p>Evidence from the site visits / surveys leads the Council to conclude that recreational pressure has the potential to lead to both direct and indirect impacts on Bechstein's bats.</p>	<p>A footnote should be added to Table 2 to explain that impacts arising from the Ashton Park Strategic Allocation for Trowbridge have already been addressed and require no further mitigation.</p>
39		<p>Exclude Ashton Park from Figures 4 and 5 and update footnotes.</p>	<p>See response to rep 38</p>	<p>See response to representation 38.</p>
40		<p>Paragraph 148 – concerns raised that if the full residual area of green space is required for mitigation, there will not be adequate room for formal and informal open space.</p>	<p>The Council considers it is possible to achieve necessary requirements by maximising multi benefits of areas of green space.</p>	<p>No change required.</p>

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41		Paragraph 150 – Are 15m buffer zones in addition to the estimated residual green space identified in Table 4?	Yes, changes can be made to Figure 6 in the TBMS to clarify the requirements	No change required.
42		The TBMS should clarify that S106 obligations required to deliver the mitigation strategy will not apply to Ashton Park. Viability assessment needed to determine whether S106 contributions are viable	The Council believes this is already clear from the text in at paragraph 208. We consider S106 contributions would not threaten viability.	No change required.
43		Paragraph 208 should clarify that S106 obligations required to deliver the mitigation strategy will not apply to Ashton Park. Persimmon would welcome the opportunity to work with Wiltshire Council over the next draft of the TBMS.	See above. Persimmon's points are clearly made and further consultation probably not required given that the TBMS is not intended to cover the planning application at Ashton Park	No change required.
44		Delays in publishing the TBMS have stymied delivery of housing in Trowbridge. Wiltshire Council should not adopt the TBMS as a Supplementary Planning Document until the Wiltshire	The process of preparing the TBMS and the WHSAP has been complex. It is indeed the Council's intention to adopt the TBMS SPD at the same time as the WHSAP.	No change required.

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		<p>Housing Sites Allocations Plan examination process is concluded.</p> <p>The Sustainability Appraisal did not test all reasonable alternatives in the Trowbridge Community Area Remainder. This could have yielded locations which would have presented lower risk to bats.</p> <p>Wiltshire Council must holistically review the spatial strategy for Trowbridge through the Wiltshire Local Plan Review process.</p>	<p>The whole of the Trowbridge Community Area Remainder is within the bat habitat sensitivity zone.</p> <p>It is agreed that the review of the Wiltshire Core Strategy will once again undertake an holistic site assessment process at Trowbridge.</p>	
45	Redrow Homes (840359)	H2.1 and H2.2. lie close to the red zone. 'Willowy Copse' and 'Railway Woodland' are known to support large and internationally significant breeding meta populations of Bechstein's bats. Why weren't allocations further away from these important habitats considered during the preparation of the WHSAP?	The allocation of sites is not the role of the TBMS.	No change required.
46		The impact of the TBMS on housing delivery is uncertain. Survey work is seasonally constrained, and it is not clear from Table 4 whether sufficient greenspace will be available for mitigation <u>and</u> the proposed 30m buffers. Ambiguities in the Supplementary Planning Document	Developers and their ecologists should have been aware of this issue from the adoption of the Core Strategy, the publication of the Bat Special Area of Conservation Guidance, the Ashton Park allocation and	Figure 6 should be amended to make the image clearer, to improve the proportions and to make the text consistent with the rest of the document.

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		could take time to resolve through pre-application discussions.	responses to other planning applications.	
		Arbitrarily applying a zone of minimum 30m is onerous and could significantly constrain capacity. It is essential that Wiltshire Council implements an approach that is flexible that responds to the site and survey results.	The Council fully intends to be as flexible as possible. Initial calculations suggest the quantum of mitigation measures is eminently deliverable.	No change required.
47		Conflict of interest by TBMS author who as well as being a Technical Direct with Johns Associates, is also Secretary of the Wiltshire bat Group. It is essential that the Council's policies are based on information that is factually and scientifically sound and impartial and it appears this is not the case.	The data comes from the Biological Records Centre and a wide range of sources listed in Section 3.2.7 and the direction comes from the Wiltshire Council brief, Council Ecologists, Natural England and local bat experts. The consultant referred to is a member of CIEEM and complies with its Code of Professional Conduct. The TBMS is therefore based on a robust scientific approach. The report is therefore impartial and it is considered that there is no conflict of interest.	No change needed.
48	Savills	Welcome the TBMS.	These comments have been reviewed and changes have been made.	See proposed changes to be made in response to representation 34 above.

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		Broadly reiterates comments made by other consultees with a view of improving accuracy and clarity.		
49	Wiltshire Bat Group	Query over why such low levels of access to Biss Wood. Knee-high kick fencing may be sufficient to prevent people straying into the woods	The survey was undertaken in line with a standard protocol and visitor levels reflect the usage at that time. A warden due to be employed when development of Ashton Park begins will review measures need to ensure public pressure does not affect breeding bats.	No change required.
50		Surveys undertaken to support the TBMS should be made public.	The TBMS is supported by data available from the Biological Records Centre, data to inform planning application for Ashton Park, as well as publicly available research and the experience of local bat ecologists.	No change required.
51	HGT Developments Ltd	An ecologist will need to work closely with a lighting specialist to meet the lighting requirements of the SPD.	This is likely to be necessary and already occurs for relevant planning applications.	No change required.
52		Concern about whether it is possible to receive a timely response to pre-applications.	The TBMS seeks to standardise the approach to applications in the area which currently demand a bespoke response.	No change required.

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53		Through consultation there needs to be an opportunity to agree level of baseline lighting survey appropriate to individual circumstances.	Agree, this is covered in the TBMS.	No change required.
		Automatic assumption that allocation developments should apply bat survey effort commensurate with the industry standard for high quality / high risk areas, but this could be refined [down] for some sites through consultation	The yellow and red hatched zones are considered to be high quality / high risk areas.	No change required.
		Surveying for Bechstein's bats would impose significant constraints on developers	As explained in the TBMS, surveys for Bechstein's at allocation sites are unlikely to be effective. The document sets out how Bechstein's bats should be considered. However, it is recognised that clarity should be given about the meaning of broadband surveying for horseshoe bats.	Clarity should be provided over what is meant by broadband surveying for horseshoe bats.
		When would development be accepted in the red zone? Where is the survey evidence to support the red zone?	Surveys undertaken of bats trapped at Green Lane Wood for Castlemead form the basis of assumptions used to fix the red zone at 600m	No change required.

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54		30m buffer is arbitrary and overly onerous	See the response to rep 13	See the response to representation 13.
		On what basis is 'key bat habitat' features defined?	'Core bat habitat' should be defined at the bottom of section 4	See the response to representation 24.
		On what basis has the quantum of green space mitigation been allocated.	Greenspace is not allocated in the TBMS but table 4 demonstrates that it should be possible to meet the TBMS habitat requirements after an allowance is made for the footprint of development.	No change required.
		Can Sustainable Drainage Schemes be included in the green space requirements?	Sustainable Drainage Schemes can be designed to provide bat habitat, see section 8.2.4	No change required.
		Could special dispensation be given to developers who have already committed resources to allocation sites.	No, developments must be able to demonstrate they are compliant with the Habitats Regulations which is the purpose of the TBMS.	No change required.
		Can offsite land in the developer's control be used to offset/compensate for potential effects?	Yes potentially, subject to location and ability of the site to contribute to the aims of the TBMS. Early discussions with the Council would be needed.	No change required.

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		The combined tariff per dwelling for yellow and grey zones is overly onerous.	The tariff for yellow zones is payable through S106 while the tariff for grey zone comes out of CIL, the additional money payable by developers is not considered to be onerous	No change required.
		Specific bat mitigation parameters plan required and an ecological mitigation plan required. Overly onerous.	A parameters plan incorporating bat mitigation is required. It is not unusual to require a parameters plan at outline and a detail mitigation scheme at full application stage	No change required.
		Lighting to be considered from the outset at pre-application stage.	While lighting can be dealt with through the parameters plan for outline applications, full details will be required for full applications. This is already a routine requirement for applications in Bradford-on-Avon, Bath, & Trowbridge	No change required.
		Site specific queries in relation to Elizabeth Way.	These points can be appropriately addressed through pre-application enquiry process.	No change required.
55		Paragraph 100 - clarification needed on the number of static detectors required as there appears to be	The number of statics required will depend on site conditions and potential impacts of the scheme. The purpose is to ensure detection	No change required.

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		<p>conflict with the Bat Conservation Trust (BCT) guidelines.</p> <p>Clarify what is meant by 'potential flyways' as having static detectors for each flyway appears excessive</p>	<p>of SAC bat flightlines which are used regularly or seasonally. This may mean more statics are required that the BCT guidelines suggest. As always, where doubt exists then pre-application advice should be sought from the Council.</p>	
56	Ecology Solutions	<p>Paragraph 105 – unclear whether baseline lighting surveys would be required for outline applications</p>	<p>Planning submission requirements now clarifies in a new table at the end of section 8.</p>	<p>See the response to representation 23.</p>
57		<p>Paragraph 109 states that baseline light measurements should always be taken in absence of moonlight. This is considered unreasonable as bats may fly in moonlit conditions</p>	<p>The TBMS guidelines adopt the Bat Conservation Trust / Institute of Lighting Professionals guidance. Absence of moonlight is used as a standard as this represents worst case scenario (i.e. the darkest possible conditions). It is acknowledged that bats will fly in moonlit conditions, however their behaviour will change to avoid more brightly lit areas.</p>	<p>No change required.</p>
58		<p>Paragraph 129 – noise is unlikely to be a problem to commuting / foraging bats, only to roosting bats. Guidelines distances needed.</p>	<p>Agree that bats are relatively tolerant of noise depending on its characteristics. Little research to base fixed guidance on therefore a precautionary but reasonable approach is required</p>	<p>No change required.</p>

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59		Paragraph 130 – developers are expected to retain and enhance foraging and commuting routes on site. Therefore, no adverse effects can occur and there is no need for mitigation for in-combination effects	There is degree of uncertainty associated with mitigation/enhancement and, in accordance with the precautionary principle and the Habitats Regulations e, in-combination effects are anticipated and are therefore addressed through the TBMS.	No change required.
60		Paragraph 131 – biodiversity offsetting metrics are generally criticised as being simplistic and overvalue habitats of low ecological interest, as such better to use professional judgement	Professional judgement can be variable. Reaching agreement lengthens the determination process. The Environmental Bill is advising the use of metrics.	No change required.
61		Residential areas outside the main settlements in the yellow zone should have a buffer around them to recognise their higher intrinsic light levels	Higher light levels in these areas will be variable, more appropriate to deal with this matter on a case by case basis.	No change required.
62		Query over inconsistencies between Table 3 and Figure 4.	As Table 3 explains, there is a 1.5km buffer for Bechstein's and a 4km buffer for greater horseshoe. The buffers are not entirely consistent with the Bats SAC guidance as it was prepared in 2015. Since then more data has	No change required.

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			become available, which has been used in preparing the TBMS.	
		Paragraph 141 refers to 'key bat habitat' but no definition is provided.	Key bat habitat, important bat habitat now termed 'core bat habitat'.	See response to representation 24.
63		Paragraph 143 should clarify which type of planning application it is referring to.	It refers to full and reserved matters applications.	See the response to representation 23.
64		Paragraph 146 – typo last line to read section 8.2 below	Agree.	Typographical error to be corrected.
65		Paragraph 147 should clarify which type of planning application it is referring to	Agree.	See the response to representation 23.
66		Paragraph 148 refers to 'important features' and 'core bat habitat' but no definition is provided	Agree.	See the response to representation 24.
67		The need to buffer new habitat by 15m may dissuade developers from providing bat habitat in the first place. New habitat should not be required to have a buffer.	There is no option but to provide 100% mitigation for lost habitat on site and this must be buffered in accordance with the TBMS.	No change required.
		Paragraph 152 suggests that hop-overs are not an acceptable means of mitigation, however it has been	While it is not impossible that such measures could be effective, there is no evidence that they are and there is some evidence to suggest	No change required.

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		accepted on other species as mitigation for the same species.	they aren't. Each situation should be judged on its merits, rather than hop-overs being used without question.	
68		Paragraph 160 – what level of noise that would be unacceptable for recreational use of bat mitigation habitat.	Bats are relatively tolerant of noise depending on its characteristics. At this stage, there is little research to base fixed guidance upon therefore a precautionary, but reasonable approach, should be exercised on a case by case basis.	No change required.
69		Paragraph 170 (as set out for para 130 above (representation 60)) where enhancement is achieved, there is no residual impact, therefore no in-combination effect and therefore S106 contributions should not be payable.	There is a degree of uncertainty associated with mitigation / enhancement. Therefore, in accordance with the precautionary principle, in-combination effects are anticipated and addressed through the TBMS.	No change required.
70		The TBMS is more stringent than the requirements of the Wiltshire Housing Sites Allocations Plan (WHSAP) Habitat Regulations Assessment in relation to buffer distances (it required 10-16m corridors below 1 lux)	The final version of the WHSAP has been amended to be consistent with the TBMS.	No change required.
71		Paragraph 196 - comments akin to those for representations 60 and 70 above.	As above for representations 60 and 70.	No change required.

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
72		In applying the precautionary principle, Wiltshire Council should not be aiming for zero risk (EC advice 2000).	Wiltshire Council is not aiming for zero risk but compliance with the Habitats Regulations and applying the test of beyond reasonable scientific doubt.	No change required.
73		Paragraph 238 – no allowance for developments that chose to include a SANG to avoid paying the levy. Exemptions should be allowed.	New SANGS need to be large enough and interesting enough to attract people who would otherwise visit the woodlands. Most allocations could not achieve this within the allocation boundary.	No change required.
74	Coulston Estates	Concerns raised about the cumulative effect of the TBMS requirements and wider planning measures on the viability of sites. There needs to be clarity over what is required for the different types of planning applications.	We consider S106 contributions would not threaten viability. See response to representations 23 and 66.	No change required.
		Will phased applications relating to less than the full allocation be acceptable (assuming comprehensive masterplan provided)	Yes, provided they comply with the masterplan.	No change required.
		Clarity needed over the 30m buffer zone and how 'core habitat' is going to be defined	Agree, a point raised in several other responses and a matter to be addressed.	See the response to representations 24 and 25.

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
		Is further new survey required for Elm Grove?	The currency of data will be a matter for the applicant to address. This will be a matter for the planning application process to consider. Should further data be required this would involve additional survey work.	No change required.
		Paragraph 132 - will Community Infrastructure Levy (CIL) be increased to cover the mitigation required by applications in the grey hatched recreation zone.	No, CIL rates will not be increased.	No change required.
75		Clarification needed over when in the planning process each of the requirements in paragraphs 141 – 143 is needed	See the response to representations 23 and 66.	See the response to representations 23 and 66.
76		Paragraph 150 – clarify whether it is only mitigation for bat <u>habitat</u> loss that needs to be mitigated within allocations	See the response to representations 24.	See the response to representations 24.
77		Para 148 – Definition needed for 'core bat habitat'	Agree. A change should be made to the text to clarify the definition.	See the response to representation 67.
		Para 150 concerns about the width of the buffer being 30m, also a lack of clarity in Figure 6	See the response to representation 25.	See the response to representation 25.

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
78		Concerned that the buffers in the TBMS go beyond that specified in the WHSAP Habitats Regulations Assessment.	See the response to representation 71.	See the response to representation 71.
		Paragraph 152 – it may be too onerous to comply with, it may not be possible to mitigate for breached hedgerows	See the response to representation 26.	See the response to representation 26.
79		Paragraph 173 make no reference to baseline light levels.	See the response to representation 27	See the response to representation 27.
80		Raises some of the same points as raised in relation to H2.1.	See the response to representation 74	See the response to representation 74.
81	Newland Homes	As representation 75.	See the response to representation 75	No change required
82		Is further new survey required for Upper Studley?	This would be matter for the planning application process to determine.	No change required
		As representation 76 but with site specific queries for Upper Studley.	See the response to representation 23.	See the response to representation 23
83		As representation 77.	See the response to representation 24.	See the response to representation 24

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
84		Table 2 and Figure 4 – it is considered that there will be areas within the yellow zone that do not provide suitable habitat for SAC bats and if this is confirmed, reduced contributions from development should be sought.	Surveys cannot confirm the presence or absence of Bechstein's bats. The TBMS takes a precautionary approach based upon the best available scientific information. Notwithstanding that point, each application will be considered on its merits, including the results of independent surveys.	No change required.
85		As representation 78	See the response to representation 25.	See the response to representation 25.
86		As representation 79	See the response to representation 26.	See the response to representation 26.
87		As representation 80	See the response to representation 27.	See the response to representation 27.
88				
89	CTM Wildlife	Figure 4 – it appears the yellow zone only covers part of Biss Brook. It should cover the whole of the Brook as this comprises core bat habitat.	It covers that part of the Brook which may be affected by development. The Brook is undoubtedly a commuting route (and therefore 'core bat habitat'). While it currently doesn't fall under the TBMS, planning applications affecting the Brook may need to meet similar criteria in line with development plan policies.	No change required.

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
90	Castlewood Properties Ventures Ltd (supported by a technical note from consultants (NPA acting for Castlewood Properties Ventures Ltd))	<p>The TBMS goes too far in terms of proposed scope. It does not meet the definition of Supplementary Planning Document.</p> <p>Bat mitigation should be site specific, informed by master planning and the evidence submitted to support a planning application.</p>	<p>The Council believes it meets the tests for SPD.</p> <p>The Council considers the TBMS provides the minimum level of mitigation necessary to demonstrate planned developments will have no impacts alone and in-combination.</p>	No change required.
		<p>The TBMS is overly prescriptive. It assumes all green space within allocations will provide bat mitigation (see page 2, bullet point 5).</p> <p>The evidence base that supports the TBMS is insufficiently detailed, and it is unclear on what basis it has been determined that proposed housing site allocation H2.2 is an important area for bats.</p>	<p>The TBMS needs to be sufficiently prescriptive to enable the Habitats Regulations Assessment for the Wiltshire Housing Sites Allocations Plan (WHSAP) to be concluded favourably.</p> <p>Provided any formal sports pitches are not lit it is a fair assumption that all green space can provide bat mitigation, albeit sports pitches would be of lower quality than rough grassland, scrub or woodland.</p> <p>Assumptions have been made based on bat records, survey evidence and aerial photographs. Bat records are patchy therefore a precautionary approach has been taken to ensure that less frequent but important migration routes are captured. This precautionary</p>	No change required.

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
			approach is necessary given the inherent difficulties with surveying Bechstein's bats and the need to provide connectivity despite lack of data for the wider landscape.	
		TBMS needs to explain how conflicts between bat and highway lighting requirements will resolved.	The required buffer of 15m to core bat habitat will ensure no conflict with highways requirements.	No change required
		<p>Is the estimated residual green space identified in Table 4 for H2.2 required exclusively for bat mitigation or is this for addressing other constraints as well? This is confusing.</p> <p>Unlike the North Somerset and Mendip bat SAC guidance, TBMS does not include a clear method for calculating required areas for bat mitigation. Without this how can future windfall sites be assessed, how can site viability be tested?</p>	<p>The residual greenspace is that which is left after allowing for housing at 30dph, therefore it includes allowance for all other constraints.</p> <p>The Council expects that developments will be able to use the Defra Biodiversity metric to assess viability etc.</p> <p>Future windfall sites are not expected to come forward for green field sites (other than as NP allocations or rural exception sites).</p>	No change required
		Castlewood Property Ventures and Linden Homes wish to be involved in further stages of the TBMS process.	The Council will continue to work positively with landowners and developers to address specific mitigation proposals.	No change required

Representation No	Representation	Summary of the issue	Wiltshire Council response	Amendments
91	Barratt Homes Bristol	Arnolds Hill Farm is outside the red and yellow zones and therefore this site should be acceptable for development	The TBMS does not extend into the Bradford on Avon Community Area. Further greenfield development with the potential to impact the Special Area of Conservation would need to be subject to appropriate assessment and meet high standards of bat mitigation. This matter will be addressed through the Wiltshire Core Strategy Review process.	No change required.
92	Barratt Homes	Paragraph 141 - H2.3 Elizabeth Way is in multiple ownerships and will be brought forward through separate planning applications. Provided appropriate mitigation is provided and evidenced we do not see the need for a master plan for the whole site.	The master plan will be required to ensure mitigation is adequate in terms of quantum, connectivity and design.	No change required.

Appendix B – Press advert and insertion into the Town and Parish Newsletter

Wiltshire Council Local Development Framework Notice of consultation on Draft Trowbridge Bat Mitigation Strategy Supplementary Planning Document

Town and Country Planning (Local Planning) (England) Regulations 2012 (Part 5 Regulations 11 to 16)

Planning and Compulsory Purchase Act 2004

Wiltshire Council is consulting on a Draft Trowbridge Bat Mitigation Strategy (Prepared in support of the Draft Wiltshire Housing Sites Allocations Plan) Supplementary Planning Document (SPD). When adopted it provides a detailed approach to considering impacts of development in the Trowbridge area on the Bath and Bradford on Avon Bats SAC. This will help inform strategic planning for the area's future housing needs.

Availability of documents

The Trowbridge Bat Mitigation Strategy SPD and information on how to make comments will be published on **21 February 2019**. The documents will be available on the Wiltshire Council website at: <http://www.wiltshire.gov.uk/planning-policy>.

Hard copies of these documents will also be made available during normal office hours at: Trowbridge, Bradford on Avon and Westbury libraries; and the main Council offices in Trowbridge (County Hall).

How to comment

• Comments are invited on these documents **from 21 February until 5pm 21 March 2019**.

Comments can be made:

- Online via the Council's consultation portal: <http://consult.wiltshire.gov.uk/portal>
- By email using the form available at <http://www.wiltshire.gov.uk/planning-policy> and returned to spatialplanningpolicy@wiltshire.gov.uk
- By post in writing to: Spatial Planning, Economic Development & Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN

If responding by post, comment forms are available online and from the listed libraries above and the Trowbridge Council office (County Hall).

Next steps

All comments received during the consultation period will be taken into account. Final versions of the Trowbridge Bat Mitigation Strategy SPD will be submitted for approval by Cabinet, with the SPD being considered for recommendation to Full Council for adoption. Any queries should be made to Spatial Planning, Economic Development and Planning, Wiltshire Council on (01225) 713223 or spatialplanningpolicy@wiltshire.gov.uk.

, Corporate Director – Growth, Investment and Place
Wiltshire Council

Appendix C - Letter sent by email or post

Spatial Planning Policy
Economic Development and Planning
County Hall
Bythesea Road
Trowbridge
Wiltshire
BA14 8JN

19 February 2019

Our reference: «Person_ID»

Dear «Given_Name» «Family_Name»,

Notice of consultation on Draft Trowbridge Bat Mitigation Strategy Supplementary Planning Document

Wiltshire Council is consulting on a Draft Trowbridge Bat Mitigation Strategy Supplementary Planning Document (SPD), which has been prepared to support the Draft Wiltshire Housing Site Allocations Plan and the Wiltshire Core Strategy.

It is a strategy for considering the impacts of development in the Trowbridge area on the Bath and Bradford on Avon Bats Special Area of Conservation (SAC) and sets out an approach for mitigation to avoid significant adverse impacts.

Consultation documents

The Draft Trowbridge Bat Mitigation Strategy SPD and information on how to make comments will be published on **21 February 2019** via the Wiltshire Council website at: <http://www.wiltshire.gov.uk/planning-policy>

Hard copies of these documents will also be made available during normal opening hours at: Trowbridge, Bradford on Avon and Westbury libraries; and the main Council office in Trowbridge (County Hall).

How to comment

Comments are invited on the Draft Trowbridge Bat Mitigation Strategy SPD **from Thursday 21 February until 5pm Thursday 21 March 2019**.

Comments can be made:

- Online via the Council's consultation portal: <http://consult.wiltshire.gov.uk/portal>
- By email using the form available at <http://www.wiltshire.gov.uk/planning-policy> and returned to spatialplanningpolicy@wiltshire.gov.uk
- By post in writing to: Spatial Planning, Economic Development & Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN

If responding by post, please use the comment forms that are available online and from the listed libraries above and the Trowbridge Council office (County Hall).

Next steps and further information

All comments received during the consultation period will be taken into consideration before the SPD is finalised and presented to the Council's Cabinet and subsequently Full Council for adoption.

Should you require further information on the consultation, please email: spatialplanningpolicy@wiltshire.gov.uk or telephone 01225 713223.

Yours faithfully/sincerely



Corporate Director
Growth, Investment and Place
Wiltshire Council

Appendix D - Wiltshire Council Website



Local Development Scheme 2019
Consultation on the Masterplan for The Maltings and Central Car Park, Salisbury

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Local Development Scheme

✓ **[Consultation on Draft Trowbridge Bat Mitigation Strategy Supplementary Planning Document](#)**

Wiltshire Council is consulting on a Draft Trowbridge Bat Mitigation Strategy Supplementary Planning Document (SPD), which has been prepared to support the Draft Wiltshire Housing Site Allocations Plan and the Wiltshire Core Strategy.

It is a strategy for considering the impacts of development in the Trowbridge area on the Bath and Bradford on Avon Bats Special Area of Conservation (SAC) and sets out an approach for mitigation to avoid significant adverse impacts.

Consultation documents

The Draft Trowbridge Bat Mitigation Strategy SPD can be viewed and downloaded via the supporting documents tab in the [consultation portal](#), further information on how to comment can be found below.

Hard copies of these documents will also be available during normal opening hours at: Trowbridge, Bradford on Avon and Westbury libraries; and the main Council office in Trowbridge (County Hall).

How to comment

Comments are invited on the Draft Trowbridge Bat Mitigation Strategy SPD from Thursday 21 February until 5pm Thursday 21 March 2019.

Comments can be made:

Community Infrastructure Levy

Brownfield register

Statement of Community Involvement

Gypsy and Travellers

Contact Us

Privacy notice

Links



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