

Trowbridge Bat Mitigation Strategy – Summary document

Introduction

This document has been written to provide a simple guide to the Trowbridge Bat Mitigation Strategy (TBMS) for those assessing development in and around Trowbridge. It summarises and provides signposts to the relevant sections of the TBMS for each stage of development.

This document serves only as a guide and does not replace the TBMS. For detailed information continue to read the TBMS which is available at the Wiltshire Council website - [Wiltshire Housing Site Allocations Plan](#).

The landscape around Trowbridge is home to three species of rare bat which are functionally linked to a protected site, the Bath and Bradford on Avon Special Area of Conservation (SAC). The implementation of the TBMS will ensure new housing allocated in the Wiltshire Housing Site Allocation Plan (WHSAP) is legally compliant.

This document is split into three sections:

1. Zones – requirements based on location
2. Yellow zone – planning requirements
3. Yellow zone – site design requirements

1. Zones - requirements based on location

Three zones have been identified the red, yellow, and grey zone. Where new applications are submitted you must check which zone the application falls within and ensure that the development satisfies the requirements in Table 1. The red and yellow zones can overlap with the grey zone so sites can fall into more than one zone at once.

The zones are based on whether development in the area could negatively impact on rare bats linked to the Bath and Bradford on Avon SAC. In the grey and yellow zones mitigation delivered through the TBMS will be used to safely eliminate any impacts.

Table 1. Development requirements in the TBMS zones

Zone	Planning and site design requirements	Financial requirements (all contributions index-linked to 2018)
Yellow	Development must meet the requirements set out in sections two and three of this document.	<p>The development must make the following financial contribution to strategic bat mitigation via Section 106 agreements:</p> <ul style="list-style-type: none"> • For residential development, £777.62 per dwelling; • For all other development types, £23,310 per hectare <p>These rates were set in February 2020 and must be index linked back to this date in any legal agreement associated with a planning permission.</p>
Grey	N/a	<p>Developers will not pay directly for strategic recreational mitigation. Funding will instead be calculated annually from the number of housing completions and taken from the CIL receipts at the following rate:</p> <ul style="list-style-type: none"> • For residential development, £641.48 per dwelling
Red	N/a - Development is unlikely to be granted planning permission	

2. Yellow zone – planning requirements

Development within the Yellow zone must protect and enhance core bat habitat onsite. Table 2 below adapted from Table 8.2 in the TBMS, outlines the requirements which must be satisfied during each stage of the planning process for different applications in the yellow zone.

Table 2. Requirements for planning applications within the yellow zones.

Submission requirement	TBMS paragraph reference	Outline planning application	Full planning application	Reserved Matters planning application	Householder planning application
Pre-application advice recommended	99 & 139 & 140	Helpful to establish whether the TBMS constrains the principle of development	Helpful to establish the extent to which the TBMS will drive layout and design of the development	Helpful to establish whether changes have occurred in relation to the TBMS since planning permission was granted	Necessary if application lies in the Red Zone
Bat surveys	Sections 6.2 & 6.3 & 6.4	Yes	Yes	Yes, if more than 2 years since Outline / Full application approved	Potentially yes depending on nature of the proposals
Masterplan	142	Yes, to cover the entire allocation. Indicative test layouts required to demonstrate housing numbers are compatible with constraints	Only if permission is being sought for part of a larger allocation / development site	No	No
Parameters Plan incorporating TBMS standards for habitat mitigation (section 8.2) *	142	Yes	No	No	No
Ecological Mitigation Plan *	143	No	Yes	Yes	Potentially yes depending on nature of the proposals
Baseline lighting	Section 6.2	Not usually, may be	Yes	Yes, if not provided in	Yes, if standards in

Submission requirement	TBMS paragraph reference	Outline planning application	Full planning application	Reserved Matters planning application	Householder planning application
surveys		necessary where housing density suggests minimum standards may not be met		Outline application	section 8.2 of the TBMS cannot be met
Lighting Impact Assessment, including lux contour plots, in line with section 8.3 of TBMS*	144	Not usually, may be necessary where housing density suggests minimum standards may not be met	Yes	Yes, if not provided in Outline application	Yes, if core bat habitat affected
Construction Ecology Management Plan *	144	No	Yes, may be deferred to condition if requirements are straightforward	Yes, may be deferred to condition if requirements are straightforward	Not usually
Landscape and Ecology Management Plan *	144 & 145	No	Yes, may be deferred to condition if requirements are straightforward	Yes, may be deferred to condition if requirements are straightforward	

* will be secured either through a condition or legal agreement of any permission granted

3. Yellow zone - site design requirements

Developments in the yellow zone must satisfy the criteria below to be compliant with the TBMS. The development must be designed to ensure no net loss of habitat onsite. Applications must use the DEFRA Biodiversity Metric 3.0, or any subsequent revisions thereof, to demonstrate no net loss onsite. This must align with the Ecological Mitigation Plan submitted with full applications or the parameters plan submitted with outline applications.

All applications in the TBMS yellow zone must identify and retain core bat habitat (as identified through bat surveys) and provide dark buffers. Specific lighting conditions and lighting design solutions are provided in the TBMS section 8.3.0 – 8.3.4. The following zones must be established:

- Zone A: Core Bat Habitat and New Core Bat Habitat
 - All applications to identify and retain core bat habitats (hedgerows, streams, ponds, scrub etc.).
 - The core bat habitat must remain connected to the wider habitat network and remain relatively undisturbed by the effects of urbanisation.
 - The core bat habitat must be expanded with new core bat habitat so that it is of minimum width 15m. If development is planned on multiple sides of the core bat habitat it should be expanded by 7.5m on each side.
 - 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 <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 Zone A. 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.
- Zone B: Dark Buffer Zone
 - A ‘dark buffer zone’ of minimum 15m must be provided between development and Zone A.
 - It is critical that the buffer zone is unlit, with strict illuminance targets to be met (within the range of <1 lux on the horizontal plane measured at the development edge of the buffer zone reducing to <0.2 lux on the horizontal plane at the boundary with the bat habitat zone).
- Zone C: Development
 - The development zone (Zone C) is characterised by a dominance of hardstanding and built structures. While lighting is required in this zone, sensitive lighting design will be required in order to:
 - achieve illuminance targets within the buffer zone and the bat habitat zone
 - avoid upward spread of light and thereby minimise environmental impacts more generally.

Figure 1 below, extracted from the TBMS Figure 6, demonstrates how these zones should look in practice.

Figure 1. Core bat habitat feature, and associated buffer zones indicated for both development boundary features (above) and within development features (below)

