

PLANNING STATEMENT

EXTENSION TO EXISTING POULTRY BUILDINGS

PREPARED FOR

Devonshire Poultry Limited
Oakstone Farm
Bratton Road
West Ashton
Trowbridge
Wiltshire
BA14 6AX

28th August 2025



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1. TERMS OF REFERENCE

- 1.1 Acorus Rural Property Services (Acorus) has been instructed by Mr Robert Lanning of Devonshire Poultry Limited (the Applicant) to prepare a planning statement to support a planning application for the extension of existing poultry buildings on land at Oakstone Farm, Bratton Road, West Ashton.
- 1.2 The author is James Whilding MRICS FBIAC, Managing Director of Acorus. Acorus is a rural planning and design consultancy and part of the NFU group of companies. James has provided professional advice to local authorities and rural businesses for more than 25 years and is familiar with all of the appropriate design standards for agricultural buildings and associated planning matters.
- 1.3 This statement details the extent of the planned development and assesses any potential impacts this may generate. The proposal is considered in light of National and Local Planning Policy and all other relevant requirements.

2. BACKGROUND

- 2.1 Devonshire Poultry Limited, based at the home farm near Honiton in Devon, has produced high-quality broiler chickens since 1991. The business supplies poultry exclusively for meat production, currently raising over 8.5 million chickens annually across eight farms located in the South West. All chickens are reared to Red Tractor standards within indoor production houses.
- 2.2 The Oakstone site covers approximately 4 hectares (10 acres) and includes 4 poultry houses, operating under an Environmental Permit for up to 260,000 bird places. Day-old chicks are placed into the houses, with 35% of each flock thinned at around day 30, and the remaining birds removed by day 42. An additional 7–10 days is allocated for cleaning and preparing the houses before the next flock. On average, the site produces seven flocks (crops) per year.

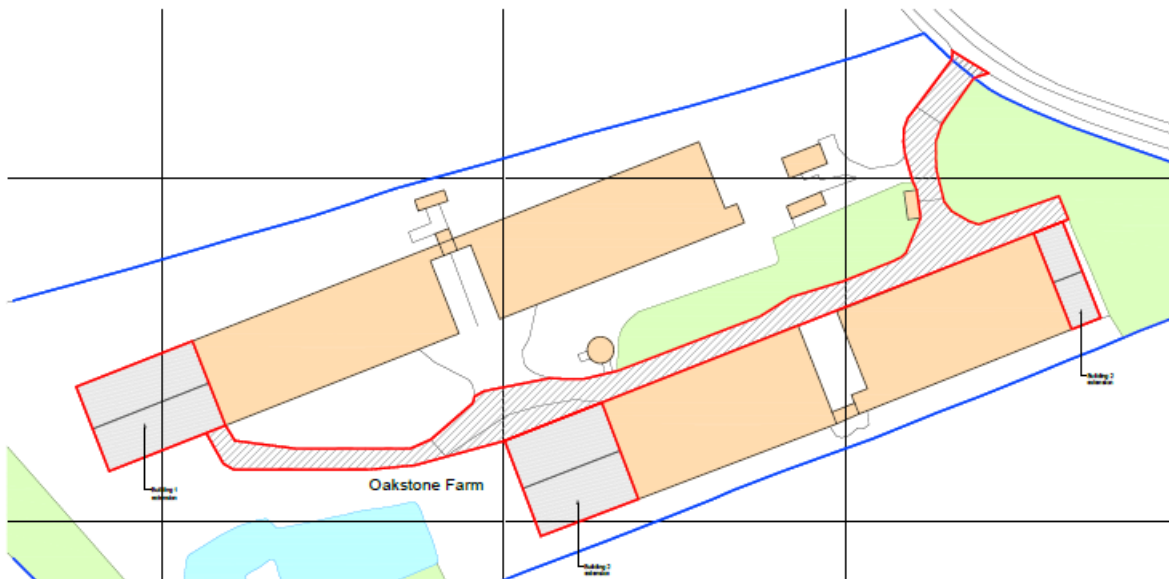


Source: Google Earth - Aerial image of site

3. THE PROPOSAL

3.1 The proposal comprises the following extensions:

- Poultry House 1 - 30.48m x 9.144m (100ft x 30ft); 279m²
- Poultry House 2 - 30.48m x 30.48m (100ft x 100ft); 929m²
- Poultry House 4 - 36.576m x 25.908m (120ft x 85ft); 948m²



Source: Acorus

- 3.2 The design and materials will reflect those of the existing poultry Houses. The proposed olive green cladding is a commonly used material in agricultural contexts and will help further integrate the extended buildings into the surrounding landscape.
- 3.3 The buildings extensions will be sited on new concrete slabs of approximately 100mm thick (with thickened edge beam footings) and will be clad with box profile polyester coated steel sheeting to match the existing buildings.
- 3.4 The buildings will be insulated to modern standards with glass fibre insulation. Ventilation will match existing provisions, being ridge inlet and side extract.
- 3.5 As noted previously, the permit with the Environment Agency extends to 260,000 bird places. The extensions to the buildings will not result in an increase in stocking on the holding. This is due to reduced stocking as a direct result of supermarkets seeking a higher welfare product. In moving from 38kg/m² to 30kg/m², the stocking rate is approximately 20% less than the standard contract. These extensions are necessary to maintain stock levels on the holding.

4. PLANNING ADVICE & HISTORY

Planning History

4.1 In reviewing the Wiltshire Council portal, the following planning history is noted for the site.

PL/2025/05985

Provision of 3 ancillary buildings including a staff welfare facility, agricultural storage building and replacement biomass building to support the existing business - Under Consultation

15/01553/VAR

Erection of an agricultural workers dwelling (Removal of condition 2 of planning permission 14/06930/FUL to enable a rural worker to live permanently in the existing mobile home) - Closed

W/94/00999/FUL

Use of land for agricultural worker's dwelling in 2 mobile units and clay pigeon tuition and training – Closed

W/88/01735/OUT

Proposed agricultural workers dwelling - Closed

W/02/01441/FULES

Erection of two broiler units - Closed

W/86/00250/FUL

Broiler House - Closed

14/06930/FUL

Erection of an agricultural workers dwelling - Closed

W/96/00812/FUL

Siting of mobile home - Closed

W/87/01319/FUL

Proposed storage barn and feed hoppers - Closed

Pre-Application Advice

- 4.2 No initial consultation has been undertaken with the LPA.

Community Involvement

- 4.3 No initial consultation has been undertaken with the local community. Notification of the proposed development will be issued following validation of the application.

5. PLANNING POLICY

National Policy

National Planning Policy Framework (NPPF)

- 5.1 The National Planning Policy Framework sets out the Government's planning policies for England. The presumption is in favour of sustainable development. Paragraph 8 details the three dimensions to sustainable development; economic, social and environmental.

an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities health, social and cultural well-being; and

an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

- 5.2 Paragraph 9 states that Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.

- 5.3 Section 6 is entitled 'Building a strong, competitive economy' and paragraph 85 states:
Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.

5.4 To support a prosperous rural economy, local and neighbourhood planning policies and decisions should enable (paragraph 88):

- the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;
- the development and diversification of agricultural and other land-based rural businesses.

Local Plan Policies

Wiltshire Core Strategy

5.5 The Wiltshire Core Strategy, adopted in 2015, provides a positive and flexible overarching planning policy framework for the county. This Core Strategy is currently under review and will set out the future for Wiltshire for the period to 2036.

5.6 Under the Wiltshire Core Strategy (adopted 2015, currently under review), the site falls within the Chippenham Community Area. Relevant policies include:

Core Policy 2 (Delivery Strategy)

Core Policy 41 (Sustainable construction and low carbon energy)

Core Policy 48 (Supporting rural life)

Core Policy 50 (Biodiversity and Geodiversity)

Core Policy 51 (Landscape)

Core Policy 52 (Green infrastructure)

Core Policy 55 (Air quality)

Core Policy 57 (Ensuring high quality design and place shaping)

Core Policy 58 (Ensuring the conservation of the historic environment)

Core Policy 62 (Development impacts on the transport network)

Core Policy 65 (Movement of goods)

Core Policy 67 (Flood risk)

Core Policy 68 (Water resources)

Core Policy 69 (Protection of the River Avon SAC)

6. FLOOD RISK ASSESSMENT

Definition

- 6.1 The Environment Agency model for river or sea flooding is an indicator of the worst case scenario where flood defences fail. River flooding mainly happens when the river catchment (that is the area of land that feeds water into the river and the streams that flow into the main river) receives greater than usual amounts of water (for example through rainfall or melting of snow).
- 6.2 The amount of run-off depends on the soil type, catchment steepness, drainage characteristics, agriculture and urbanisation as well as the saturation of the catchment. The additional water causes the level of the water in the river to rise above its banks or retaining structures.
- 6.3 The Environment Agency map the country into 'flood zones' which are defined as follows:
- Flood Zone 1 - The area where flooding from rivers or sea is very unlikely. There is less than 0.1% (1 in 1000) chance of flooding occurring each year.
 - Flood Zone 2 - The area of medium probability of flooding – a flood with an annual chance of occurring of between 1% (1 in 100) to 0.1% (1 in 1000) for river flooding and 0.5% (1 in 200) to 1% (1 in 1000) for coastal flooding.
 - Flood Zone 3a - The area of high probability of flooding – a flood with an annual chance of occurring of 1% (1 in 100) or greater for river flooding and 0.5% (1 in 200) or greater for coastal flooding.
 - Flood Zone 3b - This area is a functional floodplain which is an area designed to flood – a flood return period of 1 in 20 or less.

Assessment

- 6.4 Paragraph 170 of the NPPF states that “inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk.”
- 6.5 As identified on the EA Flood Map for Planning, the site is located within Flood Zone 1, with the overall flood risk from rivers or the sea being very low which means that each year this area has a chance of flooding of less than 0.1%.



Source: Flood Map for Planning – River Flooding



Source: Flood Map for Planning – Surface Water Flooding

- 6.6 It is suggested that the proposed development is appropriate at this location and no detailed flood risk assessment is deemed necessary.
- 6.7 The proposed development site is an extension to an existing poultry site with an efficient surface water drainage strategy in place, and one that is approved by the Environment Agency.
- 6.8 In light of the above, and low risk of flooding, the proposed extensions are considered acceptable in flooding terms.

7. WASTE MANAGEMENT

Waste Bedding

- 7.1 The waste bedding is removed at the end of the crop and taken by tractor and sealed trailer off site. During this clean out period of 7-10 days the outside service area will be treated as fouled with wash water being diverted to a containment tank.
- 7.2 Following removal of waste, the buildings will be pressure washed and disinfected prior to a new batch entering the facility.
- 7.3 All waste bedding (manure) is and will continue to be taken off site to third party landowners for spreading in accordance with the Code of Good Agricultural Practice (COGAP). Such waste to land provides environmental and cost saving benefits and reduces reliance on inorganic fertilisers. The manure is rich in N, P and K and so greatly reduces crop fertiliser costs.
- 7.4 The site is not located within a Nitrate Vulnerable Zone. Regardless, any receivers of waste bedding from the site will not be located in a catchment sensitive area.

Waste Water

- 7.5 At the end of the cycle all birds are depleted off site with the buildings being dry cleaned by means of compressed air being used to remove dust build up from the building internals and equipment before litter is removed. The buildings are then washed clean using high pressure water which is collected and removed from site for land spreading before all building internals are disinfected to point of run.
- 7.6 All dirty water is generated solely during the clean down process. To ensure no pollution risks are posed this effluent must be handled appropriately. Each of the extended houses will take about 8 hours to be washed down by a specialist contract gang. There are likely to be two pumps (one working in one house and one in another) each operating 2 pressure washing lances. Each individual lance delivers about 15 litres per minute. They are likely to be running for 70% of the time and so the total volume of water used in an 8-hour day will in total be approximately 20m³.
- 7.7 In practice, because of the warm temperature of the concrete floor inside the houses some of this water will evaporate.

- 7.8 All the buildings will have a link to an existing underground dirty water catchment tank so all dirty wash water is drain to a contained system. The tank is emptied as and when required and taken away by the contractor to a safe site.
- 7.9 Water is directed to these via drainage points located within the concrete service apron with all external waters being picked up via the same system. Changeover valves are used to control the direction of clean and dirty waters.
- 7.10 Therefore, during depletion and cleanout a valve located at the collection point is manually changed over and all surface water and shed washings discharge to the dirty water collection tanks which are closely monitored to remain at a manageable level throughout the process.
- 7.11 As soon as a section of yard becomes clean this part can then be diverted into the clean water system, so avoiding catching unnecessary rain water. Outside of the clean down period all surface water will be treated as clean and will be directed accordingly.
- 7.12 With the existing dirty water drainage system in place and with the diverting valves to the clean water system in the manholes, the polluted water can be safely contained when necessary while safely diverting the clean water at other times. On this basis there should be little risk of pollution occurring.

Clean Water

- 7.13 All runoff from the roofs is collected via gutters and down pipes to French drains and the concrete areas outside of cleaning out periods are designated as clean or lightly contaminated water and taken to an existing soakaway.
- 7.14 The existing clean and dirty water management system and process complies with all the Codes of Practice and the Environmental Permit, and given good management the likelihood of any pollution or runoff occurring is minimal.

8. AMENITY & AIR QUALITY

Nearby Buildings and Dwellings

- 8.1 There are no residences and a single agricultural building within 400m of the site (see following aerial imagery).

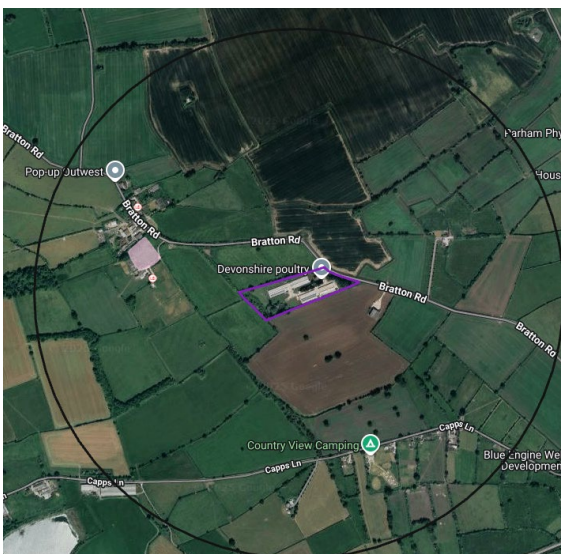


Source: Searchland

Heritage

- 8.2 There are two listed buildings recorded within the area surrounding the proposed development area, both of which lie to the west of the site. Details are as follows:

- Dunge Farmhouse (Reference 1262081) Grade II Listed Building – 650m
- Lower Dunge Farmhouse (Reference 1286070) Grade II Listed Building – 420m

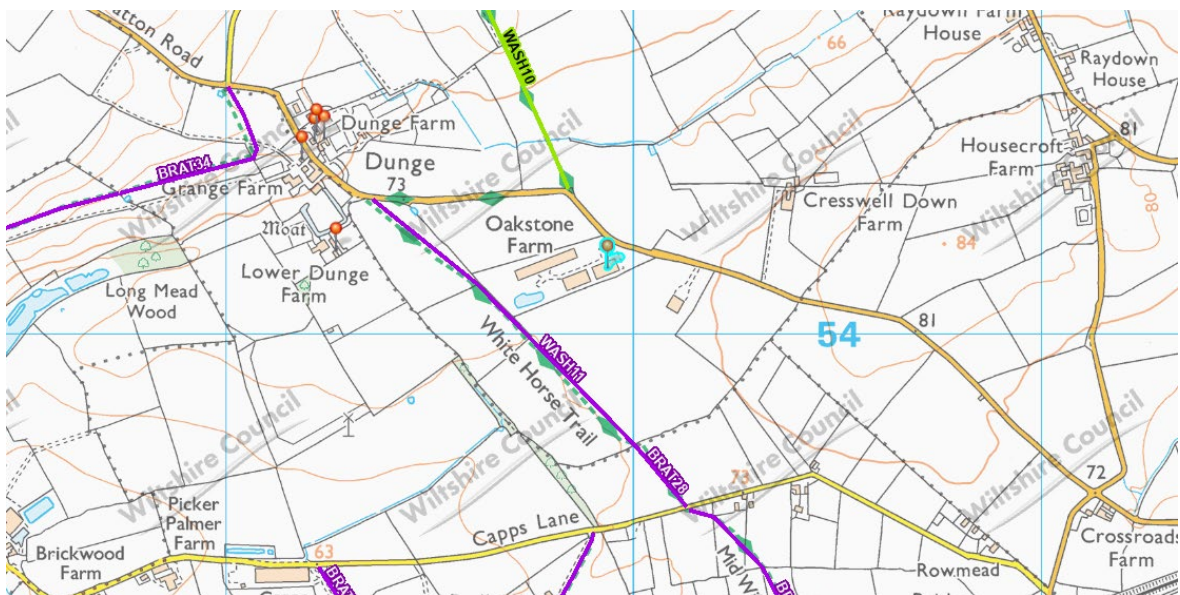


Source: Searchland

- 8.3 As these listed buildings are more than 400m distant of the site, it is considered that the buildings are sufficiently remote to ensure there will be no direct physical impact on the listed buildings from the development.

Rights of Way

- 8.4 As identified below, the nearest Public Right of Way (PROW) lies to the west of the site (WS14/96). This PROW will be unaffected by the planned development.



Source: Wiltshire Council

Odour

8.5 The following sources have been identified as contributing to a potential medium - high risk odour source.

- Odour emissions from compound feed selection
- Odour emissions from feed delivery and storage
- Odour emissions from ventilation techniques
- Odour emissions from litter conditions and management
- Odour emissions from carcass storage and disposal
- Odour emissions from drinking water systems
- Odour emissions from de-stocking
- Odour emissions from cleanout (litter removal)
- Odour emissions from dirty water generation and storage (washout)
- Odour emissions from litter/ manure
- Odour emissions from carcass storage
- Odour emissions from dust build up

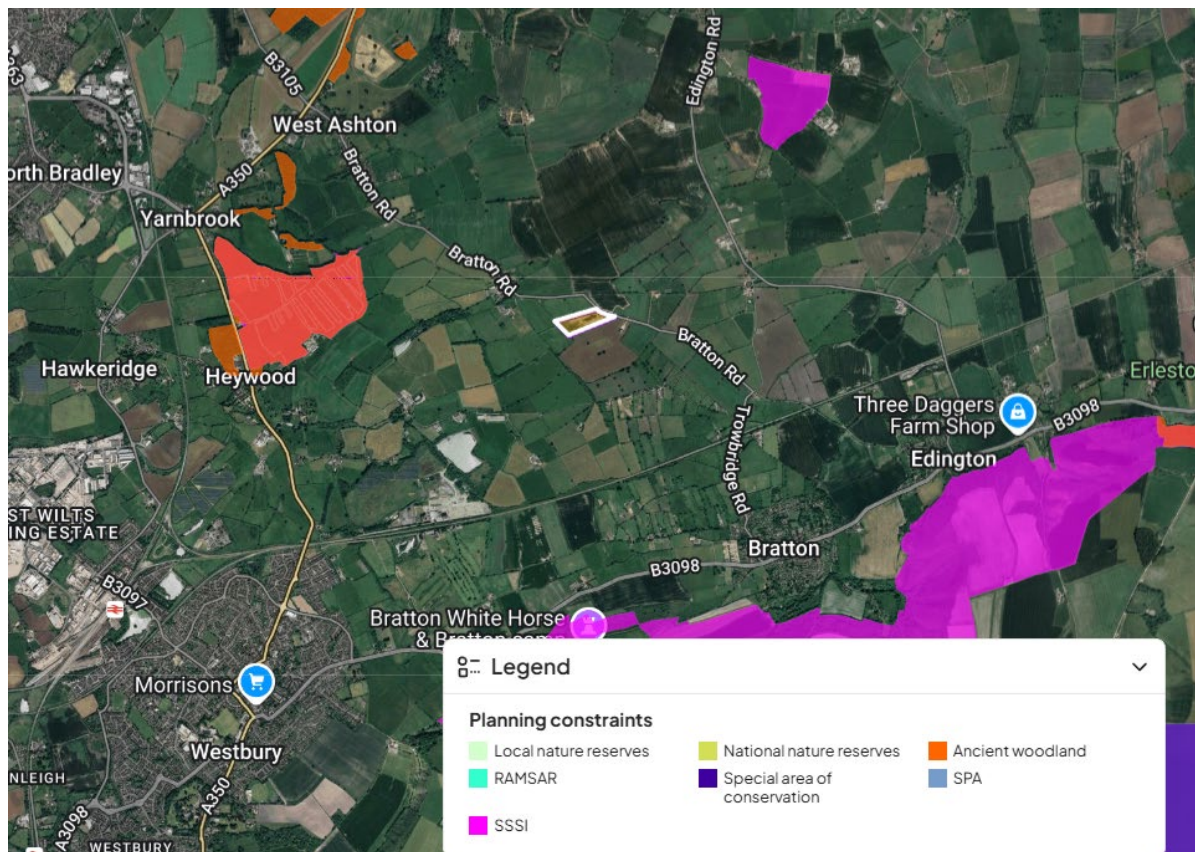
8.6 The pathway for all of the above sources would be via the atmosphere, with the most sensitive receptors being inhabitants of nearby residential dwellings. The impact on receptors will depend on the frequency of detection, intensity as perceived, duration of exposure, offensiveness and receptor sensitivity.

8.7 Given the scale of the enterprise remains unchanged and there is no record of any historical complaint, odour is not considered to be an issue.

Ammonia

8.8 Problems posed by ammonia are well known and mitigation is included in several international agreements and regulations, including the UNECE Gothenburg Protocol, the EU National Emissions Ceiling Directive (NEC), and the Integrated Pollution Prevention and Control Directive (IPPC).

8.9 The following mapping identifies Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites within 5km, any Sites of Special Scientific Interest (SSSIs) within 5km and also any National Nature Reserves (NNRs), Local Nature Reserves (LNRs), ancient woodlands and Local Wildlife Sites (LWSs) within 2km of the farm. The following map identifies Steeple Ashton SSSI approximately 1.8km to the north and Picket and Clanger Wood 1.6km to the west.



Source: Searchland

8.10 Noting that bird numbers will not increase beyond permitted levels as a result of this development, the impact of ammonia on the highlighted designated land should result in no change (or in implementing 30kg stocking rates, an ammonia reduction). This should be viewed positively and therefore the impact from ammonia screened out.

Noise

8.11 The following sources have been identified as contributing to a potential medium - high risk noise source.

- Noise arising from vehicle movements into and around the site
- Noise arising from ventilation systems and operations
- Noise arising from de-populating (thinning and final depletion)
- Noise arising from cleanout (machines and loading of trailers)
- Noise arising from standby generators and other mobile plant

8.12 The pathway for all of the above sources would be via the atmosphere, with the most sensitive receptors being inhabitants of nearby residential dwellings. Given there are no third-party dwellings in the locality, it is considered that noise is screened out and not a concern.

Dust & Bioaerosol

8.13 The following sources have been identified as contributing to a potential medium - high risk odour source.

- Emissions from compound feed selection
- Emissions from feed delivery and storage
- Emissions from ventilation techniques
- Emissions from litter conditions and management
- Emissions from bird depletion
- Emissions from cleanout (litter removal)
- Emissions and fine vapours generated from high pressure washing/disinfecting

8.14 The pathway for all of the above sources would be via the atmosphere. With the most sensitive receptors being inhabitants of nearby residential dwellings the wind direction will significantly influence how receptors are affected. With no sensitive receptors in the locality, impact from dust is not a concern.

9. LANDSCAPE

Present impact

- 9.1 The site lies in open countryside but outside of a designated landscape. It is bordered to the east by Bratton Road, which is an adopted, publicly maintained road. Otherwise, the site is relatively flat and screened on all sides by established trees and hedgerows. These tree-lined edges enhance the rural character of the boundary and provide a natural barrier that defines the transition into the site. The road plays a crucial role in shaping access and contributing to the site's perimeter definition.
- 9.2 The site is characterised by the existing poultry buildings. These are agricultural buildings and by their very nature will take on a certain appearance to satisfy the scale and function. Their appearance (existing and proposed) is typical of most modern farms, and certainly poultry farms, and is considered in keeping with other farm building developments over the past 30 years since the advent of the wide span portal framed structure.
- 9.3 These structures are considered an accepted part of the landscape.

Mitigation

- 9.4 Given the extent of screening on all sides of the development, it is considered that there is no requirement for additional planting along the perimeter of the site, subject to recommendations to meet its BNG obligations. An HMMP (Habitat Management and Monitoring Plan) will be provided as a condition of planning consent.
- 9.5 In considering the extent of existing screening, additional planting is not required except to meet BNG obligations. Should the LPA seek further planting, this can be dealt with via a planning condition.

10. ECOLOGY AND BIODIVERSITY NET GAIN

10.1 A ecological assessment (PEA) of the site has been undertaken which has concluded that, provided the recommendations within the report are followed and the mitigation hierarchy of avoidance, mitigation, compensation, and enhancement is implemented throughout the detailed design process, potential negative effects from development on important ecological features will be negligible.

10.2 Following an e-DNA survey, the results of which revealed the presence of great crested newt DNA, a following up site survey was undertaken. It was concluded that the proposals have low/negligible risk of causing direct harm to GCN or damaging existing suitable habitat. As no GCN habitat will be affected, these proposals will not trigger the need for a GCN licence.

10.3 The PEA undertaken included potential works forming part of a separate planning application (PL/2025/05985) which is currently under consideration. The on-site net change details are as follows:

On-site net change (units & percentage)	<i>Habitat units</i>	1.53	10.68%
	<i>Hedgerow units</i>	1.11	19.28%
	<i>Watercourse units</i>	0.00	0.00%

10.4 In July 2025 the Trowbridge and Westbury Bat Mitigation Strategy was updated. The application site is located within the yellow medium risk and the grey hatched recreational zone of the TWBMS and must therefore be considered under the habitat regulations.

10.5 HalpinRobbins Limited was commissioned to undertake a site visit and produce a Technical Note in support of a planning application to extend the existing poultry sheds at Oakstone Farm in line with the recently amended Trowbridge and Westbury Bat Mitigation Strategy (TWBMS). A site visit was undertaken on 8th October 2025.

10.6 The findings of the visit are:

- There are no suitable roosting features for bats within the site.
- The site itself is dominated by mown modified grassland, bare soil and temporary storage structures providing low-negligible value for foraging bats.

11. HIGHWAYS

Existing Access

- 11.1 The site is accessed from a classified, unnumbered road, Bratton Road, which runs westward towards Dunge and southeast towards Trowbridge Road. Google Street View imagery confirms that the entrance onto the public highway has adequate visibility in both directions. Furthermore, there has been no recorded accident history at this entrance over the past five years. It is therefore considered that the existing access arrangement is safe and acceptable.



View from entrance looking west



View from entrance looking east

- 11.2 The proposed development shall make use of the existing access with the entrance onto the highway remaining unchanged.
- 11.3 There is sufficient yard area within the site to accommodate parking and turning. This allows vehicles to enter and exit the site in a forward gear, thereby enhancing safety and convenience.
- 11.4 With no increase in bird numbers, trip movements to the site will be unchanged. Therefore, there are no highway concerns.

12. OTHER IMPACTS

Flies/Vermin

- 12.1 The rearing of chicken inevitably creates quantities of manure, which is vulnerable to fly infestation. The potential is greatest where manure remains within the animal house for extended periods (flat deck breeder layer house). Flies are not a problem on a well-managed broiler site such as this unit, and given numbers will not increase, neither will the risk. There are no properties in the vicinity otherwise to be affected.
- 12.2 In terms of general vermin control, this is undertaken by an approved specialist contractor. With no change in bird numbers and a robust management policy in place, vermin risk is limited.

Lighting

- 12.3 In extending the buildings, the extent of external lighting will be unchanged i.e. above each access door.
- 12.4 The level of external lighting provided is of a modest amount and represents the bare minimum required to allow farming operations to be carried out in a safe manner. With no change in the proportion of external lighting, the proposal is unlikely to have any negative impact on protected species and their habitats.

13. CONSTRUCTION PHASE

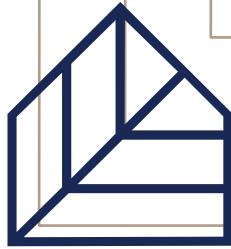
- 13.1 The construction of the extensions will most likely involve the following phases:
- a) Preparation of site and delivery of materials.
 - b) Site clearance/levelling.
 - c) Installation/connection with existing services.
 - d) Concreting and building works.
- 13.2 During construction there will be an increase in vehicle movements, but these will last for only a short period whilst materials are being delivered and given the extent of works. Given the existing access and road network this will not cause any significant impact.

14. CONCLUSION

- 14.1 The site is an existing well established poultry unit. The proposal seeks to increase the total footprint of growing space for chickens but not increase the number of birds reared on the holding. The development will result in no change in environmental effect.
- 14.2 There is strong support at a National Government level for well thought out proposals that seek to improve the viability of agriculture and the rural sector in general.
- 14.3 This proposal has considered all the potential impacts that the extension of the poultry farm may generate, and it is concluded that the proposal is not anticipated to cause any issues that could generate negative impacts. It is therefore suggested that this proposal should be fully supported by the Council.

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