

Proposal: Erection of extensions to existing poultry housing and associated infrastructure

Location: Oakstone Farm, Bratton Road, West Ashton, Trowbridge, BA14 6AX

TWBMS Strategic Habitat Mitigation Contribution

Oakstone Farm lies within the grey and yellow zones of the Trowbridge & Westbury Bat Mitigation Strategy (TWBMS) and therefore has potential to result in significant adverse impact on the special features of the Bath & Bradford on Avon Bats Special Area of Conservation (SAC). The application must therefore be considered under the Habitats Regulations.

The LPA Ecologist noted in their response dated 15.12.2025 that *"the main areas to be affected are considered to comprise greenfield land (previously undeveloped land, in this case, grassland and scrub). Additionally, habitat surrounding the site (which contains hedgerow and scrub) could be permanently impacted by, e.g., lighting."*

The following information addresses the concerns raised by the ecologist in respect of appropriate assessment for applications falling within the yellow zone and grey zone of The Trowbridge and Westbury Bat Mitigation Strategy

5 - Greenfield Sites in the Yellow Zone. Statutory Biodiversity Metric demonstrating no net loss.

- **The calculation is supported by pre and post development maps.**
- **The post development maps align with other plans and drawings.**

Revised Statutory Biodiversity Metric's have been provided:

- BNG Statutory Metric for Poultry Shed Extensions at Oakstone Farm
- BNG Statutory Metric for New Buildings at Oakstone Farm

6 For reserved matters and full applications on green field sites in Yellow Zone, an Ecological Mitigation Plan to be submitted containing (para 162):

(i) Scaled drawing to show

- **Details of replacement roosts.**
- **Core bat habitat (foraging and commuting) to be retained, created and enhanced.**
- **Location/extent and full landscape specifications for tree and shrub planting, wildflower grassland etc.**

(iv) proposals are in accordance with the standards for habitat mitigation and management as described at section 8.2 and Figure 6 in the TWBMS.

(v) Wide swathes of unlit bat habitat with associated buffer zones ensuring landscape permeable to commuting bats.

(vi) Retained core bat habitat connects to the wider habitat network.

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The LPA Ecologist noted that, *"Mitigation plan has been provided. A drawing demonstrating that the functionality of the hedgerows will be maintained (and enhanced) should be submitted. Figure 7 of the ecology report ("proposed habitats") could be used to address this, but must be amended to show the currently proposed block plan to demonstrate that hedgerow and other boundary habitats will not be encroached.*

Please note, whilst habitat improvements can be achieved through on-site BNG, details of post-development habitats and landscaping are unclear (see BNG comments below).

It is also not known whether potentially important habitats (such as the bordering hedgerow, scrub, woodland, etc.) will be impacted by lighting and, therefore, whether any mitigation for lighting is required. Please could the applicant confirm whether any new external lighting will be installed?"

We believe that the above requirements have been addressed through the following documents:

- Ecological Impact Assessment for Poultry Shed Extensions at Oakstone Farm
- Ecological Impact Assessment for New Buildings at Oakstone Farm
- BNG Assessment for Poultry Shed Extensions at Oakstone Farm
- BNG Assessment for New Buildings at Oakstone Farm
- BNG Statutory Metric for Poultry Shed Extensions at Oakstone Farm
- BNG Statutory Metric for New Buildings at Oakstone Farm

Lighting – there is to be no additional lighting on the site. The current lighting at the gable ends of the building will be relocated to the new gable ends. Thus, no increase in lighting.

7 Applications on green field sites in Yellow Zone. Lighting Impact Assessment, including lux contour plots, in line with Section 8.3 of TWBMS.

Lighting – there is to be no additional lighting on the site. The current lighting at the gable ends of the building will be relocated to the new gable ends. Thus, no increase in lighting.

12 An appropriate lighting monitoring regime has been provided.

Lighting – there is to be no additional lighting on the site. The current lighting at the gable ends of the building will be relocated to the new gable ends. Thus, no increase in lighting.

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13 The applicant agrees that a financial Strategic Habitat Mitigation Contribution (yellow medium risk bat sensitivity zone) of [REDACTED] / dwelling or [REDACTED] per hectare will be secured by S106.

The LPA Ecologist noted that, *"It is recognised that some of the site is already developed and would not be considered "greenfield". As such, the financial contribution should be based on the area of greenfield land within the site boundary only, excluding any developed areas. Based on the total area of undeveloped habitats reported in the BNG metric, the area of greenfield land would equate to 1.76 ha.*

The required contribution will therefore be 1.76 x [REDACTED]

Whilst the redline area of the site is 26502m² (2.65ha) we believe, based on the greenfield area of the extensions, this cost should be for a maximum area of 0.2161ha.

Application one PL/2025/05985

- Biomass building 270sqm
- Welfare building 70 sqm
- Storage building 10.8 sqm

Total area within the red line for development – **350.8sqm**

Application two PL/2025/08779 (current)

- Extension to Building 1 – 949.8sqm
- West Extension to Building 2 - 932.1sqm
- East Extension to Building 2 – 279.62sqm

Total "greenfield area" within the red line for development – **2161.52sqm**

0.2161ha makes the payment [REDACTED]