

Land East of Blackmore Farm, Melksham

Environmental Impact Assessment Scoping Report

October 2025

Applicant
Gleeson Land
Our reference
03004

23 October 2025

Turley

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1. Introduction

Overview

- 1.1 Gleeson Land (the 'Applicant') is preparing an outline planning application for the construction of up to 300 residential dwellings, with green infrastructure and access (the 'Proposed Development') on land south of the A3102. The planning application will be submitted to Wiltshire Council as the local planning authority.
- 1.2 The Applicant has instructed Turley to lead, manage and control the Environmental Impact Assessment (EIA) process for this project in line with the *Town and Country Planning (Environmental Impact Assessment) Regulations 2017* (as amended)¹ (the 'EIA Regulations').
- 1.3 The EIA considers the maximum extent of all temporary and permanent works that may be required as part of the Proposed Development; the boundary for which is defined by the 'EIA Study Area' for the purposes of this Scoping Report, and is shown on **Figure 1.1**. The EIA Study Area is approximately 31 hectares (ha).
- 1.4 The Proposed Development is situated immediately adjacent to a consented outline development (known as 'Land at Blackmore Farm', planning application reference PL/2023/11188)². The outline application was submitted in December 2023, supported by an Environmental Statement (ES) and granted approval in May 2025. The ES accompanying the application was subject to a Scoping exercise for a previous iteration of the development (PL/2022/01864) which included both the consented development site as well as the EIA Study Area as set out in this Scoping Report.
- 1.5 This EIA will consider the Proposed Development in isolation. The exclusion of the consented Blackmore Farm development from this EIA is justified as it benefits from an existing planning consent. However, it is acknowledged that the Proposed Development could be considered a change or extension to an already authorised development. To ensure that the potential effects of both the Proposed Development and the consented Blackmore Farm development are assessed, the consented Blackmore Farm development will be considered cumulatively. The consented Blackmore Farm development will hereafter be referred to as 'Cumulative Project 1' within this Scoping Report. Further details of the approach to assessment of the consented Blackmore Farm development and other Cumulative Projects are provided in **Chapter 2** and **Chapter 11**.

Request for a Scoping Opinion

- 1.6 To inform the EIA process, in accordance with Regulation 15 of the EIA Regulations, Turley requests a Scoping Opinion from Wiltshire Council, informed by this report. In line with Regulation 15(2) of the EIA Regulations, this report contains the following:

¹ The Town and Country Planning (EIA) Regulations 2017 No. 571 (as amended).

² The outline application was for 500 dwellings, employment space, land for a primary school, land for a mixed use hub, open space, access and landscaping.

- A plan sufficient to identify the land (**Figure 1.1**);
- A description of the Proposed Development, including its nature, purpose, location (**Chapter 4**);
- An explanation of the likely significant effects of the development on the environment (**Technical Chapters 6 – 10**); and
- Such other information or representations as the person making the request may wish to provide or make.

1.7 This report has been prepared in line with good EIA practice, whereby the project team, based on an understanding of the EIA Study Area and the preliminary understanding of the Proposed Development (as set out in **Chapter 4**), have:

- Established the existing technical baseline, either through desk-top studies/reviews, surveys, and evaluation of available technical data;
- Identified the topics and effects which are unlikely to be significant, due to the absence of a receptor (due to the location of the EIA Study Area) or source of an effect due to the nature of the Proposed Development (as defined in **Chapter 4**), or through the commitment to mitigation;
- Identified the effects which are likely to be significant and the sensitive receptors that will be assessed in the ES; and
- Established the methodology for assessing the effects in the ES which are likely to be significant.

1.8 In accordance with Regulation 15(4) of the EIA Regulations, it is anticipated that the statutory timescales will be met, and Wiltshire Council will adopt a Scoping Opinion no later than five weeks from the date of receipt of this request. Any deviation from this will be subject to a request from Wiltshire Council in writing and subsequent agreement by the Applicant. Furthermore, in line with Regulations 28, it is anticipated that Wiltshire Council will make this report and their corresponding EIA Scoping Opinion, with accompanying consultee comments where applicable, available for public inspection, either through WC planning portal website or by other means.

Definition of EIA

1.9 The term 'EIA' has the meaning given by Regulation 4 of the EIA Regulations, as 'a process consisting of -

(a) the preparation of an environmental statement;

(b) any consultation, publication and notification required by, or by virtue of, these Regulations or any other enactment in respect of EIA development; and

(c) the steps required under regulation 26.' (consideration of whether planning permission or subsequent consent should be granted)

- 1.10 EIA is a procedure that must be followed for certain types of projects before 'development consent' (i.e., planning permission) can be given. The procedure is a means of drawing together, in a systematic way, an assessment of a project's likely significant environmental effects. This helps to ensure that the importance of the predicted effects and the scope for reducing or mitigating them are properly understood by the public and the relevant Local Planning Authority (in this case, Wiltshire Council) before it makes its decision.
- 1.11 The aim of EIA, as defined by national Planning Practice Guidance³ (PPG), is to *'protect the environment by ensuring that a local planning authority when deciding to grant planning permission for a project, which is likely to have significant effects on the environment, does so in the full knowledge of the likely significant effects, and takes this into account in the decision making process....'* and *'..also to ensure that the public are given early and effective opportunities to participate in the decision making procedures'*.

Requirement for EIA

- 1.12 The Proposed Development falls within the remit of the EIA Regulations as it exceeds the criteria set out within Schedule 2 Paragraph 10(b) *'Infrastructure projects - Urban development projects'* in that the Proposed Development includes more than 1ha of non-dwellinghouse development, more than 150 residential dwellings and the total EIA Study Area exceeds 5ha. As set out above the Proposed Development could also be considered an extension of a development already authorised under Schedule 2(13). Whilst the applicable thresholds are met, this alone does not determine the requirement for EIA but requires a subsequent stage to determine *"...likely significant effects on the environment by virtue of factors such as its nature, size or location"*.
- 1.13 Based on the scale and nature of the Proposed Development the potential exists for significant effects alone and cumulatively with other the consented developments, therefore, an EIA will be undertaken, the outputs of which will be reported in an ES. The EIA is being used as a tool to identify and manage the environmental impacts and where possible avoid, reduce or offset them as part of the design process (see further details in **Chapter 2**).

Stakeholder Engagement

- 1.14 Consultation is an important part of the EIA process. It is the responsibility of Wiltshire Council to undertake the appropriate level of consultation, including the identification of relevant and applicable statutory and non-statutory consultees. It is anticipated that Wiltshire Council will consult with the following stakeholders during the preparation of their Scoping Opinion:
- Wiltshire Council (internal technical departments);
 - Lead Local Flood Authority;
 - Environment Agency;

³ <https://www.gov.uk/guidance/environmental-impact-assessment>

- Natural England;
- National Highways; and
- Historic England.

1.15 In advance of preparing this report, consultation with several of the above consultees has already been undertaken and continues to inform specifics of the design of the Proposed Development, baseline data collection and assessment methodologies. A summary of the project consultation undertaken prior to or during the preparation of the EIA Scoping Report is provided in **Appendix 1.1**.

2. Approach to EIA

Introduction

- 2.1 This report supports a formal request for a Scoping Opinion from Wiltshire Council as to the scope and methodology for assessment to be adopted in the EIA and reported in the ES. It aims to ensure that there is a clear and agreed scope for the EIA, including the relevant baseline studies, that will be required to ensure a robust assessment of likely significant environmental effects.
- 2.2 The Scoping Opinion is sought on the technical breadth of the technical topics considered within the EIA and the specific effects within each of these technical topics
Technical Chapters 6 – 10.
- 2.3 The Institute of Sustainability and Environmental Professionals (ISEP) (previously known as Institute of Environmental Management and Assessment) has issued guidance on the interaction of design and EIA as part of the IEMA Impact Assessment Guidelines Implementing the Mitigation Hierarchy from Concept to Construction (2024)⁴. The principles of these documents have been adopted for the EIA.

Iterative Approach to Scoping

- 2.4 Whilst this report seeks to establish the overall framework for the EIA in relation to the technical topics and associated likely significant effects that will be subject to detailed assessment, it is important to note that iterative 're-scoping' will continue as the design and strategy are refined, and additional technical work is completed. Whilst the EIA will be based on the EIA Scoping Opinion (as required by Regulation 18, (4), (a)), it will also take account of the continued understanding of environmental effects and development of primary and tertiary mitigation⁵. Any deviation between the scope of effects considered within this report and the ES will be clearly communicated in the ES. This is in accordance with the PPG⁶, which states that

'...where it becomes evident during the assessment process...that a particular environmental factor is absent or unlikely to be significantly affected by a proposed development, there should be no need for further assessment of that factor even though it was identified in the scoping process...'

- 2.5 It is requested that such an approach is clearly endorsed within the Scoping Opinion issued by Wiltshire Council.

⁴ IEMA (2024). IEMA Impact Assessment Guidelines: Implementing the Mitigation Hierarchy from Concept to Construction.

⁵ Institute of Environmental Management and Assessment (IEMA) Guidelines: Implementing the Mitigation Hierarchy from Concept to Construction. August 2024.

⁶ DLUHC and MHCLG, PPG, Paragraph: 038 Reference ID: 4-038-20170728 [Online].

Identification of Baseline Environmental Conditions

- 2.6 Schedule 4, Paragraph 3 states that an ES should include:

“A description of the relevant aspects of the current state of the environment (baseline scenario)...”

- 2.7 Likely significant effects as a result of the Proposed Development will be described in the ES in relation to the change from the baseline environment within the EIA Study Area and / or study area. For most technical topics and associated effects, the baseline environment will comprise the existing environmental conditions based on surveys undertaken and information / data available at the time of the technical assessments.
- 2.8 It is anticipated that the baseline conditions will largely be based on data accessed or surveys / studies completed in 2025. Where relevant and robust, other data obtained from third parties may be older, though may still be appropriate and relevant to the baseline scenario if there have been no notable changes or is the latest available information. A consolidated list of baseline data sources will be provided as part of the ES, including the origin of all data, the dates of surveys and the dates when data sources have been accessed, along with any limitations and assumptions.

Consideration of Future Baseline

- 2.9 Schedule 4, Paragraph 3 states that an ES should include:

“...an outline of the likely evolution thereof without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.”

- 2.10 As required by the EIA Regulations, the ES will report the likely future baseline conditions, which will consider potential changes to the EIA Study Area and study area assuming continuation of the existing management regime.

Identification of Sensitive Receptors

- 2.11 Under Regulation 4, Paragraph 2 an EIA must *‘identify, describe, and assess in an appropriate manner, in light of each individual case, the direct and indirect significant effects of the proposed development on the following factors -*

(a) population and human health

(b) biodiversity, with particular attention to species and habitats protected under any law that implemented Directive 92/43/EEC⁷ and Directive 2009/147/EC⁸;

(c) land, soil, water, air and climate;

⁷ OJ No. L 206, 22.7.1992, p. 7.

⁸ OJ No. L 20, 26.1.2010, p. 7.

(d) material assets, cultural heritage and the landscape;

(e) the interaction between the factors referred to in sub-paragraphs (a) to (d)'.

- 2.12 Schedule 4, Paragraph 4 states that an ES should include “*A description of the factors specified in regulation 4(2) likely to be significantly affected by the development...*”. Accordingly, informed by baseline information and data, a series of receptors or receptor groups will be identified. These receptors will be subject to detailed assessment within the EIA. Details of the receptors which are considered likely to be affected at this stage are set out in **Technical Chapters 6 – 10**.

Defining Mitigation and Methods for Implementation

- 2.13 Schedule 4, Part 7 of the EIA Regulations states that an ES should include:

‘a description of the measures envisaged to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects on the environment and, where appropriate, of any proposed monitoring arrangements (for example the preparation of a post-project analysis)...’

- 2.14 Through the EIA process different types of mitigation will be identified and developed and these are defined as:

- **Primary mitigation** – modifications to the location or design of the Proposed Development made during the pre-application phase that are an inherent part of the project;
- **Secondary mitigation** – actions that will require further activity in order to achieve the anticipated outcome and secured by planning condition / and or obligation; and
- **Tertiary mitigation** – actions that would occur with or without input from the EIA feeding. These include actions that will be undertaken to meet other existing legislative requirements or actions that are considered to be standard practices used to manage commonly occurring environmental effects.

- 2.15 The assessment of the effects of the Proposed Development within the ES will be based on the information contained within the description of the Proposed Development, which will include primary and tertiary mitigation. Examples of primary mitigation include specified building heights and surface water drainage strategy. Examples of tertiary mitigation include the adoption of best practice measures that can be controlled via a Construction Environmental Management Plan (CEMP), or measures required by legislative requirements (e.g., the Construction (Design and Management) Regulations 2015⁹). Primary and tertiary mitigation known at this Scoping stage is set out in the Preliminary Environmental Management Plan (PEMP)¹⁰ provided as **Appendix 2.1**.

⁹ Construction (Design and Management) Regulations 2015 No. 51.

¹⁰ The Preliminary EMP included as an appendix to this Scoping Report sets out all known mitigation committed to in order to reduce / avoid / prevent likely significant effects. The EMP can be extracted by

- 2.16 Within the ES, following the conclusion of the likely significant effects based on the Proposed Development (inclusive of primary and tertiary mitigation), any further mitigation (secondary mitigation) to reduce an adverse effect or enhance a beneficial one will be identified.
- 2.17 Secondary mitigation measures are only considered appropriate if there is a high level of confidence in their mechanism for implementation (by the Applicant or third party).

Consideration of Off-Site Mitigation

- 2.18 Off-site improvements / mitigation, if required, will be considered as 'secondary mitigation' and appropriately considered within the assessment of residual effects within the ES. It is considered appropriate that secondary mitigation does not need to be within the application boundary as any impact will be assessed and controlled as part of a separate approval process for such works, which will be subject to its own protocols to understand any environmental issues.
- 2.19 The off-Site mitigation is not known at this stage however, there is a potential requirement for ecological mitigation/enhancement measures to be outside of the application boundary. This potential area is delineated by the blue line as shown on **Figure 1.1**.
- 2.20 Where appropriate, the EIA will consider such works as far as reasonably possible to identify any potential secondary effects and report these within the ES. The level of assessment will be based on the information available on the form, extent, and scale of such works.

Information to Inform the Assessments within the ES

- 2.21 The technical assessments reported in the ES will be based on a series of parameter plans submitted as part of the Application and an overarching description of the Proposed Development to be provided as part of the ES. The description of the Proposed Development, supported by the parameter plans, will provide sufficient information to meet the requirements of the EIA Regulations and to inform the technical assessments undertaken as part of the EIA and reported in the ES.

Assessment Scenarios

- 2.22 The EIA will assess the likely effects arising from the construction of the Proposed Development which will include site preparation / enabling works, and construction (and collectively referred to as 'construction'), and the operational stage, i.e. once the development is complete and operational. The following will be assessed, where relevant to the environmental topic and associated likely significant effects:
- **Peak construction:** This will vary across environmental topics and will not be attributed to a specific year. Instead, it will be determined at what point the

worst-case effect considered could occur. Each technical assessment will clearly define this within the ES; and

- **Operation:** This will consider environmental effects associated with the completed and fully operational Proposed Development (2033).

2.23 All scenarios will be considered against the existing baseline conditions, where possible, as defined above. For traffic-related effects, (transport and access, air quality and noise and vibration), the first opening year (2028) will be used to consider a worst case scenario. Further details will be provided as part of the relevant ES chapters on scenarios.

Approach to Identifying Level of Effect and Significance

2.24 The method for assessment of effects will vary across technical topics, owing to the presence of specific technical guidance but the assessment of likely significant effects (and specifically the conclusions) for the construction and operational stages of the Proposed Development will be based on a single common approach as outlined below:

- **Step 1:** Define environmental sensitivity;
- **Step 2:** Define magnitude of change;
- **Step 3:** Define level of effect; and
- **Step 4:** Confirm significance.

2.25 The method for assessing the level of effect varies between technical topics but in principle will be based on:

- **The environmental sensitivity (or value, importance, etc.) of a receptor** – including aspects such as adaptability, tolerance to change or recoverability from a change; and
- **The magnitude of change (or impact) from the baseline conditions** – including aspects such as probability / likelihood of occurrence, geographical extent, complexity, duration, frequency and reversibility (i.e. temporary or permanent).

2.26 Sensitivity (or value, importance, etc.) will be assessed on a scale of high, medium, low and negligible and the magnitude of change (or impact) will be assessed on a scale of large, medium, small and negligible. Where relevant, other factors such as feedback from stakeholders, relevant legislation, international / national / regional / local standards and guidance and the inter-relationship between effects will also be considered.

2.27 The assignment of the level of effect will be based on professional judgement with the support of the matrix below (**Table 2.1**), which is seen as a tool to assist with the process. Whilst the matrix within **Table 2.1** provides ranges, this is to guide the competent expert and a definitive level of effect will be provided, where possible, for each effect.

Table 2.1: Matrix to support determining the level of effect

		Sensitivity (or value, importance, etc.)			
Magnitude of change (or impact)		High	Medium	Low	Negligible
	Large	Major	Moderate to Major	Minor to Moderate	Negligible
	Medium	Moderate to Major	Moderate	Minor	Negligible
	Small	Minor to Moderate	Minor	Negligible to Minor	Negligible
	Negligible	Negligible	Negligible	Negligible	Negligible

2.28 The terms set out in **Table 2.1** used to define the level of effects identified are described as follows and these can be ‘beneficial’ or ‘adverse’:

- **Major effect** – where the Proposed Development is likely to cause a considerable change from the baseline conditions and the receptor has limited adaptability, tolerance or recoverability or is of the highest sensitivity;
- **Moderate effect** – where the Proposed Development is likely to cause either a considerable change from the baseline conditions at a receptor that has a degree of adaptability, tolerance or recoverability or a less than considerable change at a receptor that has limited adaptability, tolerance or recoverability;
- **Minor effect** – where the Proposed Development is likely to cause a small, but noticeable change from the baseline conditions on a receptor that has limited adaptability, tolerance or recoverability or is of the highest sensitivity or a considerable change from the baseline conditions at a receptor which can adapt, is tolerant of the change and / or can recover from the change; and
- **Negligible** – where the Proposed Development is unlikely to cause a noticeable change at a receptor, despite its level of sensitivity or there is a considerable change at a receptor that is not considered sensitive to a change.

2.29 For some technical topics, relevant guidance or the nature of the effect requires that differing criteria or scales for determining the level of effect be used. For consistency within the ES, the final ‘level of effect’ will be reported using the terminology and conclusions set out above. This enables the conclusions of assessments across all technical topics to be understood for the decision-making process, along with allowing robust analysis and appraisal as part of the assessment of cumulative effects.

2.30 For each effect, a judgement will be made as to whether the effect is ‘Significant’ or ‘Not Significant’. This determination will be based on professional judgement and / or relevant guidance and standards, where applicable. Significance will only be concluded for residual effects (i.e. following the identification of secondary mitigation or enhancement). Effects will also be described in line with the requirements of the EIA

Regulations (i.e. as direct or indirect; short (<1 year), medium (1 – 10 years) or long-term (10+ years); permanent or temporary).

- 2.31 Summary of effect tables that outline the likely significant effects, receptors, residual level of effect and whether this is considered to be 'Significant' or 'Not Significant' will be provided at the end of each Technical Chapter within the ES.

Approach to the Consideration of Alternatives

- 2.32 Schedule 4, Paragraph 2 of the EIA Regulations states that an ES should include:

“a description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects”.

- 2.33 The PPG¹¹ states that where “...alternative approaches to development have been considered, the Environmental Statement should include a description of the reasonable alternatives studied which are relevant to the proposed development and its specific characteristics and provide an indication of the main reasons for the choice made, including a comparison of the environmental effects”.

- 2.34 The EIA Regulations and PPG do not require an Applicant to undertake an assessment of alternatives but where reasonable alternatives have been considered by the Applicant, these should be described and an indication of the main reasons for selecting the chosen option, including a comparison of the environment effects, provided. The consideration of alternatives has therefore followed a two-step approach, with Step 1 completed as part of this report:

- **Step 1:** Consideration of types of alternatives based on the EIA Regulations (i.e., alternative sites, alternative designs, and alternative technologies) and justification / discussion of their inclusion / exclusion from further reporting; and
- **Step 2:** Qualitative appraisal of the alternatives brought forward from Step 1 and, where appropriate, a comparison of the environmental effects.

Format of the ES

- 2.35 The ES will comprise four volumes:

- Volume 1: Primary Report and Supporting Graphics;
- Volume 2: Technical Appendices to the Primary Report;
- Volume 3: Environmental Management Plan; and
- Volume 4: Non-Technical Summary.

¹¹ DLUHC and MHCLG, PPG, Paragraph 041 Reference ID: 4-041-20170728 [Online].

Competent Expertise

2.36 Regulation 18, Paragraph 5(a) of the EIA Regulations requires the ES to be prepared by competent experts.

2.37 The EIA will be led by Turley. The Institute of Sustainability and Environmental Professionals (formerly IEMA) has awarded Turley the EIA Quality Mark in recognition of our technical quality and commitment to improvement in practice.



2.38 All technical assessments within the EIA will be undertaken by a suitably qualified project team, inclusive of a thorough technical review to assure technical credibility, followed by a subsequent procedural review by the EIA co-ordination team and EIA Project Director.

2.39 In line with the EIA Regulations, all contributors to the EIA are competent experts in EIA and this will be demonstrated in the ES with an overview of each key expert's qualifications, professional accreditations, and experience.

3. Site Context

Overview

- 3.1 This Chapter summarises the location and existing land uses within the EIA Study Area alongside its historic use. Baseline information is provided in **Chapter 5** for those topics for which no likely significant effects are identified, and in **Chapters 6 – 10** for those technical topics for which likely significant effects have been identified.

Site Location and Existing Land Uses

- 3.2 The EIA Study Area is located on land to the east of Blackmore Farm, approximately 670m east of the town of Melksham, and comprises agricultural land, with an area of existing woodland located in the southern part. The topography falls generally from east to southwest - ground levels in the east are approximately 52.20m Above Ordnance Datum (AOD) and fall to approximately 38.90m AOD in the southwest.
- 3.3 The EIA Study Area comprises agricultural fields interspersed with trees and hedgerows. A deciduous woodland is located within the south east of the EIA Study Area. A watercourse runs from the south-western boundary through the southern part of the EIA Study Area on the south-eastern boundary. Several interconnected ditches run along field boundaries and connect to the watercourse.
- 3.4 The EIA Study Area is bound by:
- Residential properties and the A3102 Sandridge Common to the north, beyond which lies a small business park;
 - A lane / bridleway (known as Prater's Lane) to the east;
 - Agricultural land and woodlands to the south; and
 - Agricultural land to the west; which has approved outline planning consent¹² (Cumulative Project 1 – see **Chapter 12**).
- 3.5 The wider area surrounding the EIA Study Area is predominantly made up of agricultural land. To the west, approximately 450m is the settlement of Melksham. To the southwest lies Snarlton Farm, which contains a range of supply companies. To the north is Manor Farm Estate, while to the northwest are agricultural buildings associated with Blackmore House and Farm. The Clacker's Brook tributary is located in the wider area at the south of the EIA Study Area amongst agricultural land, approximately 300m at its closest point. To the east of Prater's Lane is a solar electricity generating installation (Sandridge Solar Farm).
- 3.6 The EIA Study Area is well connected by the local network of Public Rights of Way (PRoWs). Notably, PRoW MELW26 runs to the west of the EIA and through the south

¹² Planning application reference PL/2023/11188 for 500 dwellings, employment space, land for a primary school, land for a mixed use hub, open space, access and landscaping.

west of the EIA Study Area from north to south, linking Sandridge Common Road to Bridleway MELW41. Bridleway MELW41 then continues to the southwest of the EIA Study Area, providing a connection to Eastern Way. Additionally, a public bridleway (MELW40) (Prater's Lane) runs adjacent to the eastern boundary, also from north to south, and links to several other footpaths and local routes.

Historic Land Uses

- 3.7 The earliest map depicting the EIA Study Area is the 1814 Enclosure Award for Melksham Parish¹³, followed by the 1837 Tithe Map for the Parish of Melksham¹⁴ and successive Ordnance Survey (OS) maps dated 1886¹⁵, 1924¹⁶, 1972¹⁷ and 1980-1988.¹⁸ The historical maps indicate that the land was historically part of the former Blackmore Forest, with evidence of early enclosure patterns. The layout of the field boundaries within the EIA Study Area has remained largely consistent since 1837, and the land has continuously been in agricultural use.
- 3.8 The OS maps indicate that land immediately to the northwest, surrounding Blackmore Farm, was historically occupied by an orchard. To the north of the Site, Blackmore Farm and Manor Farm were established farmsteads, both of which are still present today. Additionally, the Eight Acre Plantation — a woodland area located in the southeastern corner of the EIA Study Area — appears on historic maps and has remained in place to the present day.
- 3.9 The most recent notable change in land use within the wider area is the replacement in 2024 of a former school, located to the north of the EIA Study Area, with residential development that now borders the EIA Study Area. A solar farm was constructed to the east of the EIA Study Area.

¹³ <https://wshc.org.uk/our-services/archives>: 1814 Enclosure Award for Melksham Parish Ref:1368/128

¹⁴ <https://www.thegenealogist.co.uk>: 1837 Tithe Map for the Parish of Melksham

¹⁵ <https://www.envirocheck.co.uk>: 1886 edition Ordnance Survey Map

¹⁶ <https://www.envirocheck.co.uk>: 1924 edition Ordnance Survey Map

¹⁷ <https://www.envirocheck.co.uk>: 1972 edition Ordnance Survey Map

¹⁸ <https://www.envirocheck.co.uk>: 1980-1988 edition Ordnance Survey Map

4. The Proposed Development

Boundary

- 4.1 The EIA Scoping Report has been based on the EIA Study Area boundary defined in **Figure 1.1** which accounts for all temporary and permanent works associated with the Proposed Development.

Overview of the Site Preparation, Earthworks and Construction Stage

- 4.2 The key activities during the construction stage are summarised below:
- Enabling works, including site securement, establishment of construction access and set up of temporary construction compound(s) and infrastructure;
 - Utilities identification and disconnection / diversion work (as required) and made safe with appropriate notices / licenses sought, prior to commencement;
 - Implementation of protection measures around features to be retained;
 - Site preparation and appropriate surveys, including archaeological ground investigations and any remedial works, as required;
 - Groundworks, formation of drainage features and re-profiling to create development platform levels;
 - Construction of access, internal road network and new pedestrian / cycle routes and lighting;
 - Foundation preparation and installation;
 - Construction of buildings, including internal fit-out and external finishing; and
 - Implementation of hard and soft landscaping.
- 4.3 Temporary fencing / hoarding will be erected around the perimeter at the outset of enabling works and the EIA Study Area will be secured, with no public access. Temporary secure access gates will be provided to manage the movement of vehicles, plant, equipment and personnel required for the construction.
- 4.4 Welfare facilities and other temporary infrastructure (e.g. construction compound, material laydown, storage areas, etc.) will be set up as determined by the appointed contractor(s). The EIA Study Area will be kept secure in accordance with the Construction (Design and Management) Regulations 2015¹⁹ to minimise crime and anti-social behaviour.

¹⁹ Secretary of State (2015). Construction (Design and Management) Regulations 2015.

Construction Access and Routing

- 4.5 Construction traffic will access the EIA Study Area from Sandridge Common (A3102) at the northern boundary. Full construction access and traffic arrangements will be agreed with Wiltshire Council prior to construction and captured within a Construction Traffic Management Plan (CTMP) as part of a CEMP.
- 4.6 Any road closures required for the construction of the new access point will be agreed with Wiltshire Council.

Construction Material and Waste Strategy

- 4.7 The Contractor will take responsibility for inspecting and classifying²⁰ all waste materials generated by the works and obtaining any necessary permits, licenses or notices. All material removal, handling and disposal will be in line with appropriate legislation and guidance (e.g. Control of Pollution (Special Wastes) Regulations 1980²¹, The Dangerous Substances (Conveyance by Road in Road Tankers and Tank Containers) Regulations 1981²², The Hazardous Waste Regulations²³. and Environmental Protection Act 1990²⁴). Control measures will be available including spill kits and bunds for liquid run-off, fencing and tarpaulins for wind-blown debris.

Site Clearance and Utilities

- 4.8 EIA Study Area preparation works will take place across the majority of the EIA Study Area. Features for retention include the majority of hedgerows and interspersed trees and retention of the existing woodland in the southeastern part of the EIA Study Area. The creation of the new access points, internal roads and footpaths will likely require the removal of some sections of existing hedgerows/trees; however, where possible, this will utilise existing tracks and breaks in vegetation to minimise loss.
- 4.9 A footpath (PRoW MELW26) crosses the southern part of the EIA Study Area which will remain in situ. Utilities identification and disconnection / diversion works / capacity upgrades (as required) will be made safe with appropriate notices / licenses sought, prior to commencement of construction and connection. It is assumed these works would be undertaken by the relevant DNO (or their appointed contractor) and therefore do not form part of the Proposed Development.
- 4.10 The EIA Study Area does not intersect a pipeline or hazard zone and does not lie within the HSE consultation distance of a major hazard site or major accident hazard pipeline²⁵. However, there is an existing overhead electricity power cable that crosses the northern part of the EIA Study Area from the unnamed road to the east of the EIA Study Area to the A3102 Sandridge Common to the north. These will either remain in situ or be diverted as a result of the Proposed Development but will be delivered by the district network operator (DNO). New connections will be required as part of the enabling stage and within the EIA Study Area. Existing utilities and services will be

²⁰ Waste Classification: Guidance on the classification and assessment of waste (1st edition v1.1 GB).

²¹ Control of Pollution (Special Wastes) Regulations 1980.

²² The Dangerous Substances (Conveyance by Road in Road Tankers and Tank Containers) Regulations 1981.

²³ The Hazardous Waste (England and Wales) Regulations 2005 and CIRIA C741 (2015).

²⁴ Environmental Protection Act 1990.

²⁵ Health and Safety Executive's Planning Advice Website (<https://pa.hsl.gov.uk/>) accessed 12/08/25.

identified (if present) and, where required, disconnected and / or diverted. Appropriate notices and licenses will be sought from the relevant operator. Works will be undertaken in accordance with GS6 Avoiding danger from overhead lines²⁶ and HSG47 Avoiding danger from underground services²⁷.

Earthworks, Ground Conditions and Drainage

- 4.11 Ground investigation(s) will be undertaken (pre-planning) to determine the underlying ground conditions, the absence / presence, type and distribution of contamination and groundwater conditions. These will be undertaken in line with relevant guidance, such as British Standard 3930:2015²⁸ and BSEN1997: Part 2: 2007 Eurocode 7²⁹. If required, a remediation scheme will be submitted and agreed upon with Wiltshire Council in advance of works taking place.
- 4.12 To create appropriate development plateau levels, there will be both areas where levels will reduce (areas of cut) and areas where the level will increase (areas of fill). At this time, the exact nature of cut and fill is not finalised, albeit given the existing levels on the EIA Study Area it is assumed a cut and fill sub-soil balance will be achieved through careful design. With hard surfaces (roads, buildings, etc) of the Proposed Development the requirement for topsoil is reduced and a surplus will be generated. However, surplus of material can be reduced through re-use as landscaping fill within areas of Public Open Space (POS).
- 4.13 Temporary surface water drainage will be installed and maintained to mitigate flood risk and sediment loading in line with practice guidance such as CIRIA's Control of water pollution from construction sites³⁰.
- 4.14 Information regarding the exact foundations has not been finalised and will be subject to the final building design and underlying ground conditions. Nevertheless, it is anticipated that shallow foundations are appropriate for development on-Site.
- 4.15 No basements are proposed as part of the Proposed Development.

Site Working Hours and Days

- 4.16 Construction stage working hours will be 08:00 to 18:00 Monday to Friday, 08:00 to 13:00 on Saturday and no construction works on Sundays and Bank Holidays³¹. Exceptions may arise, for example, when abnormal loads are delivered / offloaded or to conduct specialist activities (e.g. service diversions) and appropriate permissions will be sought from Wiltshire Council should these circumstances arise.

²⁶ HSE (2013) GS6 Avoiding danger from overhead lines.

²⁷ HSE (2014) HSG47 Avoiding danger from underground services.

²⁸ British Standard 5930: 2015 + A1:2020 Code of Practice for Site Investigations.

²⁹ British Standards Institution (2006) Eurocode 7: Geotechnical Design (Report no. BSEN 1997).

³⁰ CIRIA (2001) Control of water pollution from construction sites. Guidance for consultants and contractors (C532).

³¹ In accordance with Wiltshire Council's Planning Consultation Guidance Notes. Available at: <https://www.wiltshire.gov.uk/article/8700/7-Demolition-and-Construction-Noise>.

Cranes

- 4.17 It is not anticipated that the use of mobile / tower cranes will be required during the construction stage.

Construction Mitigation

- 4.18 A CEMP will be developed and implemented by the appointed contractor(s). The CEMP will set out all the relevant environmental management measures and controls required during construction. The CEMP will be submitted to and agreed with Wiltshire Council and will be secured via condition. As stated above all construction works will be undertaken in line with the requirements set out in the Construction (Design and Management) Regulations 2015³² and appropriate levels of security (e.g. personnel / CCTV) will be provided.
- 4.19 All construction activities will be in accordance with the Considerate Constructors Scheme.

Completed Development

Land Use and Quantum

- 4.20 The Proposed Development is for the construction of up to 300 residential dwellings (Use Class C3), with infrastructure and access. It will include internal roads, footways, car and cycle parking, utility services, surface water drainage, and green spaces/landscaping.
- 4.21 It is assumed that residential use will comprise of a mix of flats and 2/3/4/5 bedroom houses.

Massing

- 4.22 The maximum height of proposed homes will be 3 storeys in height with a maximum height of 12.5m Finished Floor Level (FFL). The cut and fill levels are not confirmed but a maximum increase of 0.4m is assumed. The maximum heights across the EIA Study Area may be up to 12.9m from existing levels.

Access and Parking (car and pedestrian)

- 4.23 Permanent vehicular and pedestrian access / egress for the operational stage of the Proposed Development will be via the A3102 Sandridge Common at the north of the EIA Study Area. The primary access will connect to the internal road network of secondary and tertiary roads that will lead to the proposed dwellings. Internal circulation roads will provide access for residents and visitors parking.
- 4.24 Car parking will be provided in line with Wiltshire Council standards³³. Secured cycle storage areas will be provided.
- 4.25 The Proposed Development will incorporate new pedestrian and cycle accesses and routes which will provide connections between the areas onsite as well as to the

³² Construction (Design and Management) Regulations 2015.

³³ Wiltshire Council Car Parking Strategy as part of the Wiltshire Local Transport Plan (2011-2026).

surrounding area, including connection to the existing footpath to the south of the EIA Study Area.

Landscaping and Public Realm Strategy

- 4.26 The Proposed Development will include a landscape strategy which will retain and enhance the existing valuable landscape structure to reinforce local landscape character in line with published landscape character guidelines.
- 4.27 New woodland buffers and multi-functional green infrastructure corridors are proposed along sensitive boundaries of the EIA Study Area which when combined with the set back of development from these locations will provide a sensitive transition between the proposed settlement edge and wider countryside to the east and south.
- 4.28 Large areas of public open space are proposed to the north-east and south along the tributary watercourse which feeds into Clacker's Brook. To the north-east the public open space will create an offset of development from the Special Landscape Area (SLA) and provides the opportunity for a formal planting scheme which will reflect the parkland character of the SLA and contribute to visually softening the proposed settlement edge.
- 4.29 To the south the provision of multi-functional green space along Clacker's Valley Park will enhance the habitats along the watercourse, provide space for sustainable water and drainage management and create a natural setting for the existing footpath providing connections to the wider PRoW network to the south.
- 4.30 Within the Proposed Development informal and formal public open spaces, allotments and play spaces will be incorporated into the layout to create a high-quality scheme. Hard and soft landscaping will be incorporated within these areas, as appropriate, providing a comprehensive landscape strategy for the Proposed Development.

Lighting

- 4.31 There will be new lighting installations at the proposed access, along internal routes as well as within landscaping areas, where required. All permanent lighting installations will be designed and installed in line with relevant standards and guidance³⁴.

Surface Water and Foul Water Drainage Strategy

- 4.32 The majority of the EIA Study Area is located within Flood Zone 1, with the exception of an area to the south which is in Flood Zone 2 and Flood Zone 3. All development will be located within the low-risk Flood Zone 1 area. There are also areas throughout the EIA Study Area classified as being at 'low' to 'high' probability³⁵ from surface water flooding.

³⁴ Including: CIE 150: 2017 – Guide on the Limitation of the Effects of Obtrusive Light from Outdoor Lighting Installations, 2nd Edition; ILP GN01 - Guidance Notes for the Reduction of Obtrusive Light 2021; BS 5489-1 : 2020 – Code of Practice for the Design of Road Lighting; SLL Guide to Limiting Obtrusive Light 2012; SLL Lighting Handbook 2018; CIBSE LG 6 – The Exterior Environment 2016; and ILP Guidance Note 08/18 Bats and Artificial Lighting in the UK.

³⁵ Low Chance / Risk (Between 0.1% (1in1000) and 1% (1in100) chance of flooding each year); Medium Chance / Risk (Between 1% (1in100) and 3.3% (1in30) chance of flooding each year; High Chance Risk (More than 3.3% (1in30) chance of flooding each year).

- 4.33 Development will be steered to areas away from surface water flooding, with mitigation measures to reduce flood risk incorporated where appropriate. These flood mitigation measures will ensure that the EIA Study Area is safe for its lifetime and there is no increased risk from flooding to downstream or surrounding properties.
- 4.34 The proposed surface water drainage strategy will include Sustainable Drainage Systems (SuDS) including permeable paving, rainwater planters and detention basins, and will restrict run-off from the EIA Study Area to provide a 30% betterment over existing greenfield QBar rates for all rainfall events up to and including the 1 in 100-year storm, with a 45% additional allowance for the effects of climate change.

Energy and Carbon Strategy

- 4.35 The Proposed Development will incorporate EV charging Infrastructure in line with the requirements of Approved Document S³⁶.
- 4.36 The Energy and Sustainability Statement for the Proposed Development will follow the priorities of the Energy Hierarchy:
- The dwellings will be 'zero-carbon ready', and very low carbon from the outset;
 - High fabric standards will be specified;
 - There will be no natural gas connection to the proposed development; and
 - Energy demand will be met through incorporation of a Future Homes Standard level of energy efficiency, using low carbon air source heat pumps complemented by solar photovoltaic panels.
- 4.37 Other measures to reduce energy and water use will be agreed with the Wiltshire Council but are expected to accord with local planning policies.

Operational Waste

- 4.38 Waste streams generated by the Proposed Development during operation will include recyclables, mixed-waste and green waste. A Waste Management Strategy will set out the principles, strategy and targets for the management and storage of waste and maximise recycling. Appropriate storage and collection facilities will be provided which will be collected and recycled / disposed of in accordance with Wiltshire Council policy.

Utilities

- 4.39 Foul and potable water connections will be made to the existing potable water network (operated by Wessex Water) to serve the Proposed Development. Any upgrades will be the responsibility Wessex Water and therefore will not form part of the Proposed Development.

³⁶ The Building Regulations 2010, Approved Document S available at:
https://assets.publishing.service.gov.uk/media/6218c5d38fa8f54911e22263/AD_S.pdf

Timescales

- 4.40 Construction activities are anticipated to commence in 2027 subject to gaining planning permission and will take approximately 6 years. The first year of opening is assumed to be 2028 and fully operational by 2033.

5. Technical Topics to be Scoped out of the ES

Introduction

5.1 As part of the EIA process and based on the information available to date, there are several technical topics for which a further detailed assessment as part of the EIA is not justified and these topics (and related effects) will not be reported within the ES (i.e., 'scoped out'). The technical topics for which no likely significant environmental effects have been identified, including identified Cumulative Projects (see **Chapter 11**) are:

- Water Environment and Flood Risk;
- Cultural Heritage and Archaeology;
- Ground Conditions;
- Socio-Economics and Human Health;
- Climate Change;
- Lighting;
- Waste;
- Major Accidents and/or Disasters; and
- Agricultural Land.

5.2 The technical topics listed above are considered in turn below in this Chapter, with a factual evidence base provided. Where mitigation has been used to inform this judgement, the identified mitigation has been captured within the PEMP provided in **Appendix 2.1**.

5.3 The other technical topics outlined within this EIA Scoping Report also identify effects that are unlikely / not significant; these are reported in **Technical Chapters 6 – 10**.

Water Environment and Flood Risk

Technical Baseline

Topography

5.4 The topographic survey identifies that the EIA Study Area falls generally from east to southwest. Ground levels in the east are approximately 52.20m AOD and fall to approximately 38.90m AOD in the southwest.

Hydrology

5.5 A tributary of the Clackers Brook runs from the southwestern boundary through the southern end of the EIA Study Area where it exits at the southeastern boundary. There are no ponds within the EIA Study Area, however the EIA Study Area is dissected by

several ditches, and it is expected that they discharge into the River Avon via the existing interconnecting ditch/watercourse network.

Geology and Hydrogeology

- 5.6 The EIA Study Area is underlain by Oxford Clay Formation – Mudstone with some superficial deposits of Alluvium in the southwestern corner, confirmed by the Phase 1 Geo-Environmental Desk Study (**Appendix 5.2**)³⁷. As such the geology is made of up clay which is known for its low permeability and can act as a barrier to groundwater flow to provide it from reaching the surface level.
- 5.7 Both the bedrock and superficial deposits are classified as unproductive strata on the Aquifer Designations map. The EIA Study Area is not located within a Nitrate Vulnerable Zone or in a Nutrient Neutrality catchment.
- 5.8 The study also showed that groundwater levels at the EIA Study Area vary from 0.14m to 14.8m and that the EIA Study Area is not in a Source Protection Zone.

Existing Drainage Regime

- 5.9 The Wessex Water sewer records show a public surface water network in close vicinity to the EIA Study Area with the closest sewer located along Lopes Close. These consist of 300mm diameter pipes.
- 5.10 As the EIA Study Area is currently greenfield, it is expected that the surface water originating on-site travels overland into the ditches on-site which then drain off-site.
- 5.11 As the EIA Study Area is greenfield, there is currently no discharge of foul effluent. Therefore, the topographic survey did not record any drainage features, routes, or details regarding an existing foul drainage system within the EIA Study Area.
- 5.12 The Wessex Water sewer records show a public foul sewer in close vicinity to the site. The nearest sewer is located along Sandridge Common featuring 150mm diameter pipes which appears to continue into Eastern Way.

Existing Flood Risk

- 5.13 The majority of the EIA Study Area is located within a low risk Flood Zone 1 however there is an area of medium risk Flood Zone 2 and high risk Flood Zone 3 as defined by the Environment Agency's (EA) Flood Map for Planning³⁸ in the south and south-west.
- 5.14 The EA Surface Water Flood Map³⁹ indicates that the majority of the EIA Study Area is in a very low to low risk of surface water flooding with isolated areas of medium and high risk. This is due to natural depressions in the ground topography as well as the interconnecting ditch network.

³⁷ BRD Environmental Ltd, *Phase 1 Geo-Environmental Desk Study – Blackmore Farm – Phase 2, Melksham* (2025), 5.

³⁸ Environment Agency, *Flood Map for Planning* (2025). <https://flood-map-for-planning.service.gov.uk/> [Accessed 19 Sept 2025].

³⁹ Environment Agency, *Check your long term flood risk* (2025) <https://www.gov.uk/check-long-term-flood-risk> [Accessed 19 Sept 2025].

- 5.15 The Phase 1 Geo-Environmental Desk Study showed that groundwater levels at the EIA Study Area vary from 0.14m to 14.8m. The geology is made up of clay which is known for its low permeability and can act as a barrier to groundwater flow to prevent it from reaching the surface level.
- 5.16 The Wiltshire County Council's Level 1 Strategic Flood Risk Assessment (SFRA)⁴⁰ provides a sewer flooding table recorded by Wessex Water from the period 2015 to 2019 covering the SN12 7 post code area which records 4 number of sewer flooding incidents. SN12 7 post code area covers a broad extent, and the Wessex Water information does not highlight that these occurred at or close to the EIA Study Area.
- 5.17 The EA's long term flood risk webpage³ states that the risk of reservoir flooding is unlikely.

Effects Unlikely/Not Significant

Sediment generated during the construction phase

- 5.18 The potential impacts during construction of the drainage system will be associated with dust generating activities in close proximity to the local water environment. The intrusive groundworks required to install the new sewers and SuDS features etc will create dust which will be released into the surrounding environment and could enter the local watercourse network.
- 5.19 A CEMP will be prepared to outline how the construction of the Proposed Development will avoid, minimise or mitigate effects on the water environment during the construction phase. These tertiary mitigation measures (outlined in **Chapter 10**) will be secured through an appropriately worded planning condition so is considered an integral part of the Proposed Development.
- 5.20 Therefore, potential dust generated during the construction entering the local water environment is not considered to be significant and will not be considered further in the EIA or reported in the ES.

Contamination and reduction in water quality during the construction phase

- 5.21 Surface water runoff generated onsite from rainfall during construction could impact the water quality in the underlying water table and existing watercourse/ditch network through fine sediments, hydrocarbons, the introduction of cement, accidental spills and/or other wastes discharged to these waterbodies, if not suitably managed.
- 5.22 The Phase 1 Geo-Environmental Desk Study has identified that infiltration drainage is not suitable due to the presence of impermeable clay soil which will help prevent any contaminated surface water from reaching the groundwater. Groundwater levels however do vary from 0.14m to 14.8m.
- 5.23 The appointed contractor will produce and implement a construction phase surface water drainage strategy (which will align with the permanent drainage solution where possible) as well as a CEMP and method statement that will ensure water is suitably managed onsite and that the ditches and underlying water table are not subjected to

⁴⁰ JBA Consulting, *Wiltshire Council Level 1 Strategic Flood Risk Assessment* (2024), 57.

additional or contaminated surface water flows. Measures to prevent the release of any contamination to controlled waters during construction activities will be controlled in line with CIRIA C532⁴¹.

- 5.24 These tertiary mitigation measures will be secured through an appropriately worded planning condition so is considered an integral part of the Proposed Development.
- 5.25 Therefore, contamination and water quality during the construction of the drainage system to the water table and existing watercourses/ditches is not considered to be significant and will not be considered further in the EIA or reported in the ES.

Contamination and reduction in water quality during the operational phase

- 5.26 The introduction of the Proposed Development could lead to contamination from cars, HGVs and the new areas of road and roof. Pollutants could run-off into the soft landscaping and potentially infiltrate through the subgrade to the underlying water table or to the ditch/watercourse network within and surrounding the EIA Study Area.
- 5.27 The Phase 1 Geo-Environmental Desk Study has identified that infiltration drainage is not suitable due to the presence of impermeable clay soils which will help prevent any contaminated surface water from reaching the groundwater. Groundwater levels however do vary from 0.14m to 14.8m.
- 5.28 A surface water drainage strategy will be developed to ensure that surface water generated by the Proposed Development is adequately managed through the inclusion of Sustainable Drainage Systems (SuDS) and will provide sufficient treatment in line with the CIRIA C753 The SuDS Manual.
- 5.29 This primary mitigation measure is an inherent part of the project and will be secured through an appropriately worded planning condition.
- 5.30 Therefore, potential impacts of contamination and water quality during the operational phase to the water table and existing watercourses/ditches is not considered to be significant and will not be considered further in the EIA or reported in the ES.

Flood risk and surface water drainage during the construction phase

- 5.31 Flood risk and surface water drainage are addressed together because if the surface water run-off is not managed adequately during the construction phase, it could potentially lead to flooding incidents both on and off the EIA Study Area.
- 5.32 Construction activities, such as topsoil stripping within existing open space areas, will result in soil compaction and ultimately less water being bound up in the unsaturated soil matrix. This may increase the volume and the rate of surface water sheet runoff and potentially result in flooding of premises on or surrounding the EIA Study Area.
- 5.33 The appointed contractor will produce and implement a construction phase surface water drainage strategy as well as a CEMP and method statement that will ensure water

⁴¹ CIRIA (2001) Report C532: Control of water pollution from construction sites

is suitably managed on site to ensure no increase in flood risk both on and off the EIA Study Area.

- 5.34 These tertiary mitigation measures will be secured through an appropriately worded planning condition so is considered an integral part of the Proposed Development.
- 5.35 Therefore, flood risk and surface water drainage during the construction phase to the EIA Study Area and Surrounding Area is not considered to be significant and will not be considered further in the EIA or reported in the ES.

Flood risk during the operational phase

- 5.36 The site-specific Flood Risk Assessment will assess all sources potential flooding to the Proposed Development and outline mitigation measures where appropriate to demonstrate that the Proposed Development is at a low risk of flooding from all sources.
- 5.37 Whilst the EIA Study Area has areas of medium and high risk from fluvial and surface water sources, the sequential approach to design has been taken and all development is located within the low risk Flood Zone 1 area and the low and very low risk areas of surface water flood risk and the existing ditch network will be maintained. This will ensure that the natural flow paths and hydrological regime within the EIA Study Area are maintained, thus removing the risk.
- 5.38 There are areas of high groundwater within the EIA Study Area however the underlying geology is made up of clay which is known for its low permeability and can act as a barrier to groundwater flow to prevent it from reaching the surface level. Suitable mitigation measures will be implemented such as no basement development being proposed and the finished floor levels will be set no lower than existing ground, so it is considered that the risk of groundwater to the Proposed Development will be low.
- 5.39 The implementation of these primary and tertiary mitigation measures identified within the site-specific Flood Risk Assessment will be an integral part of the Proposed Development.
- 5.40 Therefore, flood risk during the operational phase to the EIA Study Area and Surrounding Area is not considered to be significant and will not be considered further in the EIA or reported in the ES.

Flood risk and surface water drainage during the operational phase

- 5.41 Flood risk has also been considered here in conjunction with surface water drainage because if the surface water run-off is not managed adequately onsite, it could potentially lead to flooding incidents both on and off the EIA Study Area.
- 5.42 The potential source of flooding is the additional impermeable areas that will generate surface water run-off and could potentially flood the Proposed Development itself or the surrounding area.
- 5.43 A surface water drainage strategy will be developed for the Proposed Development to ensure that surface water generated by the proposals are adequately managed up to and including the 1in100yr+45% allowance for climate change and does not increase the

risk of flooding to itself or surrounding areas. These drainage strategies also provide treatment of surface water through the implementation of SuDS features.

- 5.44 This primary mitigation measure is an inherent part of the project and will be secured through an appropriately worded planning condition.
- 5.45 Therefore, flood risk and surface water drainage during the operational phase of the Proposed Development to the EIA Study Area and Surrounding Area is not considered to be significant and will not be considered further in the EIA or reported in the ES.

Foul drainage during the operational phase

- 5.46 A foul drainage strategy will be developed to ensure that foul effluent generated by the Proposed Development are adequately managed onsite to so there are no impacts on the surrounding environment.
- 5.47 This primary mitigation measure is an inherent part of the design process and will be secured via an appropriately worded condition.
- 5.48 Therefore, foul drainage during the operational phase to the surrounding environment is not considered to be significant and will not be considered further in the EIA or reported in the ES.

Increase in demand on the potable water supply during operation

- 5.49 Activities during the Proposed Development which will require a water supply include sanitary facilities and drinking water supply for workers during construction and residents during operation. Therefore, there will be increase the demand on potable water supplies.
- 5.50 The local water company (Wessex Water) will be consulted prior to construction to assess the impact of this increase in the water supply and ensure that the supplies can be met without creating a noticeable effect on local residents or at source. Wessex Water will be responsible for implementing any required upgrades to the potable water infrastructure. As outlined in **Chapter 4**, any upgrades will be the responsibility Wessex Water and therefore will not form part of the Proposed Development.
- 5.51 Therefore, increased demand for potable water use is unlikely to be significant and will not be considered further in the EIA or reported in the ES.

Cultural Heritage

Technical Baseline

- 5.52 The cultural heritage baseline is informed by a combined archaeological Desk-Based assessment and Heritage Appraisal, including an assessment of setting, hereafter referred to as an Archaeological and Heritage Baseline Assessment (EDP, 2025) and is appended to the scoping report as **Appendix 5.1**. The information below summarises the results of this assessment.

Designated Heritage Assets

- 5.53 There are no designated heritage assets (as defined in Annex 2 of the National Planning Policy Framework (NPPF))⁴² such as world heritage sites, scheduled monuments, listed buildings, registered parks and gardens or registered battlefields, within the EIA Study Area.
- 5.54 In the wider area, the National Heritage List for England (NHLE) identifies three Grade II listed buildings within approximately 1km of the EIA Study Area boundary. Within a 2km search radius of the EIA Study Area boundary, the NHLE identifies one Grade II* listed building, 25 further Grade II listed buildings and one conservation area.
- 5.55 The Grade II* listed building comprises the Woolmore Farmhouse (1021762) approximately 1.4km south-west of EIA Study Area. The closest Grade II listed building is Blackmore House approximately 25m from the northern boundary of EIA Study Area. The next closest Grade II listed building is the Old Coach House approximately 650m north-east of EIA Study Area. Details of all Grade II listed buildings within the 2km study area are provided in **Appendix 5.1**.
- 5.56 Melksham Conservation Area is located approximately 1.8km west of the EIA Study Area.
- 5.57 All of these assets are assessed in accordance with Historic England Guidance⁴³, in respect of assessing whether the Proposed Development is likely to affect their value due to change within their settings. The full setting assessment is included in **Appendix 5.1**.

Non-designated Heritage Assets

- 5.58 The Wiltshire Historic Environment Record (HER)⁴⁴, held by the Wiltshire Council, was consulted regarding the location and extent of known, non-designated, heritage assets, both within and adjacent to the EIA Study Area. There are five records located within the EIA Study Area, all of which are post-medieval in date:
- Record (HER ref: MWI4935), located at the south-west of the EIA Study Area, comprises a ditch identified running broadly north-west to south-east, containing coarse ware pottery and animal bone, identified during an excavation in 1986 undertaken by Chippenham College Archaeological Group for research purposes during the laying of a pipe. Buried remains relating to these features would likely be of no greater than low, local sensitivity, reflecting localised land management features.
 - Record (HER ref: MWI4933), located at the south-west edge of the EIA Study Area, comprises a pottery scatter of Romano-British ware, including bead rim associated ware as well as two burnt areas and a pit containing refuse, including coarse ware sherds, animal bone, charcoal and iron fragments, also identified during the 1986 excavation. Buried remains relating to these features could potentially reflect

⁴² Ministry of Housing, Communities and Local Government (2024) National Planning Policy Framework

⁴³ Historic Environment Good Practice Advice in Planning: 3 (2nd Edition) the Setting of Heritage Assets (GPA 3; HE, 2017)

⁴⁴ <https://services.wiltshire.gov.uk/HistoryEnvRecord/Home/Index>

Roman settlement in this part of the EIA Study Area and thus be of medium sensitivity.

- Record (HER ref: MWI73994), located at the south-west edge of the EIA Study Area, relates to ridge and furrow visible as earthworks on aerial photography. The ridge and furrow are ascribed a possible medieval date, although a review of the aerial photographs suggests that the features are more typical in form of post-medieval agricultural remains. Buried remains of these features would be of very low sensitivity, being of a relatively common form, found elsewhere in the landscape.
- Record (HER ref: MWI73970) relates to extensive ridge and furrow evidenced across the EIA Study Areas seen on aerial photography. The ridge and furrow are recorded as 'narrow', reflecting post-medieval farming practice, rather than medieval. Buried remains of these features would be of very low sensitivity, being of a relatively recent date, and common form, found elsewhere in the landscape.
- Record (HER ref: MWI68797) comprises a demolished 19th century out farm located at the south of the EIA Study Area; the out farm likely reflected a small farmhouse intended to farm the immediate land set around them, as satellites of a larger farm. A visit to the EIA Study Area established that this outbuilding was no longer extant, although there may be remains of minimal archaeological interest within the EIA Study Area related to this building, such as infield ditches, or buried foundations. Such remains would be of very low sensitivity.

- 5.59 Within the wider 1km search area, 60 records are held by the Wiltshire HER. These records include limited evidence of prehistoric activity, with one pit recorded, containing red deer bones and a Late Neolithic/Early Bronze Age arrowhead, as well as one find spot comprising a Bronze Age socketed axehead and a fragment of a bronze sword, and a large enclosure of possible later prehistoric or Roman date identified on LiDAR⁴⁵ imagery, although currently untested by archaeological investigation and so its date is speculative.
- 5.60 Evidence of Romano-British activity is evidenced through a pit and double ditch enclosure identified during the evaluation trenching located immediately west of the EIA Study Area in 2022, as well as two further findspots, comprising pottery sherds and animal bone, iron fragments and charcoal, and a series of ditches, pits, postholes and ovens indicating a small agricultural domestic settlement.
- 5.61 The remaining results largely relate to medieval and post-medieval field systems, mainly defined by earthworks indicating ridge and furrow. However, evidence of medieval settlement is present with the HER, suggesting a farmstead with Medieval origins at Blackmore Farm, indicating that the current 18th century Farmhouse may have had earlier origins, as well as a medieval settlement at Snarlton, thought to have been occupied in the 12th and 14th centuries. As expected, the 1km search area also includes evidence of post-medieval settlement, agricultural cultivation, and industry.

⁴⁵ Light Detection and Ranging

- 5.62 Aerial photographs, held by the Historic England Archives⁴⁶, were also consulted in order to inform the baseline assessment, as was LiDAR data⁴⁷ and historic maps from online sources^{48,49} and/or the Wiltshire and Swindon archives⁵⁰. The photographs and LiDAR illustrate the buried remains of narrow ridge and furrow, which have been discussed previously, as well as marks reflecting the positions of former post-medieval field boundaries, as depicted on the historic Tithe map. A double ditched linear feature was identified on aerial photography and LiDAR imagery, running north-east to south-west across the central portion of the EIA Study Area, interpreted as a possible trackway of unknown date.
- 5.63 The earliest map to depict the EIA Study Area is the 1814 Enclosure Award for Melksham Parish⁵¹. The 1837 Tithe Map for the Parish of Melksham⁵² was also consulted, as were Ordnance Survey (OS) maps from 1886⁵³, 1924⁵⁴, 1972⁵⁵ and 1980-1988⁵⁶. The maps illustrate the enclosure of parts of Blackmore Forest and that the present layout of field is similar to that shown on the Tithe Map of 1837, with the EIA Study Area remaining under agricultural use. The OS mapping indicates that the land surrounding Blackmore Farm (immediately north-west of the EIA Study Area) was occupied by an orchard.
- 5.64 The Archaeological and Heritage Baseline Assessment has not identified any extant heritage assets within the EIA Study Area but does indicate a potential for archaeological remains. A moderate potential was identified for Roman period remains, probably of medium or low sensitivity, as well as a high potential for remains related to medieval and post-medieval agriculture of very low sensitivity.

Archaeological Fieldwork

- 5.65 A geophysical (detailed magnetometry) survey of land immediately to the west of the EIA Study Area was undertaken in May 2022 by Headland Archaeology (Headland Archaeology, 2022)⁵⁷. This survey included the most northern field of the EIA Study Area. No anomalies of 'archaeological origin' were identified, although anomalies representing agricultural features interpreted as modern cultivation, field drains and modern services were identified.
- 5.66 Following this, a programme of archaeological trial trenching was undertaken across the same survey area in 2022 by Cotswold Archaeology which occurred in two phases. No features of archaeological origin were identified within the field that is within the EIA Study Area, with only a modern service drain recorded.

⁴⁶ <https://historicengland.org.uk/images-books/archive/collections/aerial-photos>

⁴⁷ <https://environment.data.gov.uk/survey>

⁴⁸ <https://www.thegenealogist.co.uk/>

⁴⁹ <https://www.envirocheck.co.uk/>

⁵⁰ <https://wshc.org.uk/our-services/archives/>

⁵¹ <https://wshc.org.uk/our-services/archives/>: 1814 Enclosure Award for Melksham Parish Ref:1368/128

⁵² <https://www.thegenealogist.co.uk: 1837 Tithe Map for the Parish of Melksham>

⁵³ <https://www.envirocheck.co.uk: 1886 edition Ordnance Survey Map>

⁵⁴ <https://www.envirocheck.co.uk: 1924 edition Ordnance Survey Map>

⁵⁵ <https://www.envirocheck.co.uk: 1972 edition Ordnance Survey Map>

⁵⁶ <https://www.envirocheck.co.uk: 1980-1988 edition Ordnance Survey Map>

⁵⁷ Melksham Phase 1: PL/2023/11188

- 5.67 The trial trenching did identify Roman archaeology outside of the EIA Study Area which might indicate a continuation of such features into the EIA Study Area but which at this stage is not definitive evidence for archaeological remains within the EIA Study Area.
- 5.68 Consultation with Wiltshire Council Archaeology Service in July 2025, requested a programme of geophysical survey across the entirety of the EIA Study Area's open areas as well as pre-determination trial trenching with a scope defined by the results of the geophysical survey. The results of these surveys will provide further information on the archaeological potential of the EIA Study Area, in order to inform the historic environment baseline. The results of which will be included within an updated Archaeological and Heritage Baseline Assessment and submitted with the Application.

Effects Unlikely/Not Significant

Effects on Designated Assets

- 5.69 Due to the local topography rising to the east, the extent of the town of Melksham to the west, as well as further intervening woodland blocks and vegetated field boundaries, it is considered unlikely that intervisibility will exist with any distant heritage assets, such that the Proposed Development would form a part of their setting that contributes to their significance.
- 5.70 Although intervisibility is a key consideration, an understanding of the historic relationship between places is also a consideration when understanding the settings of historic assets. Consisting of farmland, it is considered that the EIA Study Area is most likely to be historically associated with local farms or estates that would have worked the land, rather than with any more distant heritage assets. As such, only one designated heritage asset is considered to be sensitive to the development proposals:
- Grade II listed Blackmore House (1364118); c.25m from the northern boundary of the EIA Study Area.
- 5.71 Other designated assets (described above) are not considered to be subject to a significant, indirect effect, due to their distance from the EIA Study Area.
- 5.72 There is potential for change within the setting of the Grade II listed Blackmore House due to the Proposed Development. However, the Proposed Development includes for open space adjacent to Blackmore House (as described in **Chapter 4**) so as it can still be experienced within a foreground setting that reflects its historic farmland setting. It is therefore not considered that this effect will be significant. No other effects on designated heritage assets due to changes within their settings are anticipated.
- 5.73 Cumulative Project 1 also identified Grade II listed Blackmore House as a sensitive receptor. The assessment identified an 'extremely low level of less than substantial harm' from the proposals, given that primary design mitigation was utilised within the development to respect the setting of the listed building. It is likely that this effect would result in a cumulative effect in tandem with the Proposed Development, with the greatest likelihood being an additional low level of less than substantial harm.

- 5.74 Therefore, indirect effects as a result of changes to setting to the Grade II listed Blackmore Farm, or any other designated assets are not considered to be significant and will not be considered further in the EIA or reported in the ES.

Effects on Non-designated Heritage Assets

- 5.75 Regarding non-designated heritage assets, the Archaeological and Heritage Assessment has identified a potential for archaeological remains within the EIA Study Area, notably for Roman period remains, as indicated by the previously identified ditch and find spots recorded within the HER, as well as the features identified near to the EIA Study Area boundary during the 2022 evaluation trenching.
- 5.76 As such, the following non-designated heritage assets are considered to be sensitive to the Proposed Development:
- Features associated with the previously recorded Roman ditch and Roman find scatter; and
 - Presently unrecorded buried archaeological features and deposits.
- 5.77 Wiltshire Council Archaeology Service have advised that the EIA Study Area should be subject to a geophysical survey and trial trenching.
- 5.78 The results of the geophysical survey and subsequent trial trench evaluation will provide additional information on the significance of archaeological remains within the EIA Study Area and as to whether their loss would comprise a significant effect.
- 5.79 Based on the Archaeological and Heritage Assessment, the greatest likelihood is that remains will be of low sensitivity and thus their loss would not result in a significant effect. However, following geophysical survey and trial trenching, it is possible that remains of moderate or high sensitivity may be found within the EIA Study Area. So as to avoid any residual significant effect, it is intended that any effects on potential buried heritage assets (archaeology) would be wholly mitigated in advance of the construction phase. As such, there would be no residual significant effect.
- 5.80 Archaeological remains with a high level of sensitivity that are deemed, through consultation with the Wiltshire Council Archaeology Service and/or Historic England, to be of equivalent sensitivity to a scheduled monument would, in accordance with Footnote 75 of Section 16 of the NPPF be treated as a designated heritage asset and thus their loss mitigated through preservation '*in situ*' within the EIA Study Area.
- 5.81 Otherwise, for archaeological remains of lower sensitivity, their loss would be mitigated through preservation by record, via a programme of archaeological excavation undertaken prior to construction and with its scope agreed in advance with the Wiltshire Council Archaeology Service.
- 5.82 As such, following the implementation of appropriate mitigation, there would be no residual significant effects on archaeological remains.

- 5.83 Therefore, direct effects to buried archaeological remains during the construction phase are not considered to be significant and will not be considered further in the EIA or reported in the ES.

Ground Conditions and Contamination

Technical Baseline

- 5.84 At the time of the site walkover for the Geo-Environmental Desk Study (**Appendix 5.2**), the EIA Study Area comprised nine grass covered fields and a wooded area in the southeastern section of the study area. A review of historic maps confirmed this agricultural land use throughout its Ordnance Survey mapped history. There is a west flowing stream across the southwestern part of the EIA Study Area and along some of the boundaries. Ditches that drain into this stream are present around some of the internal field boundaries. At the time the walkover all of these ditches were dry.
- 5.85 Geological mapping of the area shows that the EIA Study Area is underlain by clay soils and mudstone of the bedrock of the Oxford Clay Formation. Localised Superficial Deposits of Alluvium may also be present near the stream and this can commonly comprise compressible clay that may be organic, but may also be silt, sand, peat or gravel. The localised Alluvium forms a Secondary A Aquifer likely contributing to the base flow of the streams but the Oxford Clay is classed as Unproductive Strata and does not contain much groundwater.
- 5.86 At this stage, without the benefit of an intrusive ground investigation, minor potential soil contamination risks have been identified from the following:
- Use of the EIA Study Area as agricultural fields with low potential for residual pesticides in the soils.
 - Infilled ponds in the northern part of the EIA Study Area with low potential for contaminated waste materials within.
 - Potential contamination from a former stockpile in the northern area which has a low potential for cross-contamination with the underlying soils.
 - No off site sources of contamination were identified.
- 5.87 The preliminary contaminated land risk assessment identified moderate to low risks to future residents, the stream, the groundwater and buried building materials and services from these potential sources of soil contamination. It is anticipated that with the benefit of intrusive ground investigation, the vast majority, if not all, of the EIA Study Area will be confirmed as free from contaminated land risks.
- 5.88 The preliminary geotechnical assessment has not revealed any particular concerns regarding the Development. The key findings were:
- The Oxford Clay soils are likely suitable for conventional foundations. The clay soils are likely to have a medium volume change potential and so the proximity of trees will have an influence on foundation depths.

- There is the possibility for localised Alluvium deposits in the proximity of the stream and former ponds. Such deposits could complicate the design and construction of foundations in those areas, but this is expected to be very localised.
- Possible localised deep Made Ground associated with the backfill of the ponds. If present, this may complicate the design and construction of foundations but the affected areas are expected to be very localised.
- The Oxford Clay Formation is known to be potentially pyrite bearing and contains elevated sulphates. This may affect the design and construction of sub-surface structures.

Effects Unlikely/Not Significant

Potential Risks from the Presence of Unstable and Compressible Ground

5.89 Minor geotechnical constraints have been identified which may result in the depth of foundations or the concrete specification being altered in localised areas. However, no significant geotechnical issues have been identified by the preliminary work.

5.90 Therefore, effects of unstable / compressible ground is not considered to be significant and will not be considered further in the EIA or reported in the ES.

Potential for contamination from infilled ponds and former stockpiles

5.91 There is potential for contaminants from the infilled ponds and former stockpiles to impact the soils and the local groundwater and surface water bodies. However, the low permeability Oxford Clay Formation in these areas will mitigate any migration of mobile contaminants and therefore the risk to the wider water environment from these sources is not considered to be significant. The Site will be subject to a site investigation and, if required, a remediation strategy will be devised. Given the low likelihood of contamination at the Site, any remediation is likely to be minor.

5.92 Therefore, risks from contaminants from the infilled ponds and stockpiles on construction workers, soils and the water environment is not considered to be significant and will not be considered further in the EIA or reported in the ES.

Potential for spills or leaks from plant or storage areas during construction and operation

5.93 There is potential for contaminants from accidental spills from construction activities such as vehicle movements or inappropriate storage of substances. The site will operate to an CEMP which will ensure that suitable environmental controls are in place during the construction stage to prevent any risk to the environment or construction workers.

5.94 During operation there is the potential for small scale leaks and spillages associated with localised storage and use of small quantities of fuels, paints and other proprietary chemicals, and for contaminated land run-off from vehicle washing. However, the potential magnitude of accidental spillages is considered low, due to the small scale isolated nature of the potential spillages.

- 5.95 Therefore, effects of accidental spillages is not considered to be significant and will not be considered further in the EIA or reported in the ES.

Soil contamination risks from potential residual pesticides in the agricultural fields

- 5.96 Whilst potential residual pesticides in the agricultural fields has been flagged as a potential contamination risk; it is considered that their presence in significant concentrations is very rare and unlikely to occur at the site. In the rare instances they are detected during site investigation works, it is highly localised and not a widespread risk. Coupled with this, the risk during construction works from dust generation etc would not be any greater than that from dust generated during farming activities such as ploughing fields.
- 5.97 Therefore at this stage, whilst flagged as a potential contamination risk in the desk study, potential residual pesticides in the agricultural fields is not considered to be significant and will not be considered further in the EIA or reported in the ES.

Socio-Economics and Human Health

Technical Baseline

- 5.98 The EIA Study Area is located within the unitary authority of Wiltshire, which, for the purposes of the socio-economics and human health assessment, is also defined as the 'Local Impact Area'. The South West region is defined as the 'Wider Impact Area' for the purposes of the assessment.
- 5.99 The total resident population of Wiltshire is c. 523,700, accounting for c. 9% of the South West region's total population of c. 5.9 million. 60% of Wiltshire's residents are of working age (aged 16-64)⁵⁸, which is broadly in line with – albeit slightly lower than – the regional rate (61%).
- 5.100 Between 2006/07 (the start of the adopted Wiltshire Core Strategy⁵⁹ plan period) and 2023/24, a total of 39,085 homes were delivered in the unitary authority area⁶⁰, an average of 2,171 per annum. This exceeds the requirement for an average of 2,100 homes per annum set out by adopted Core Strategy policy.
- 5.101 Over the year to March 2025, the average economic activity rate amongst the working-age resident population of Wiltshire (86%) was higher than in the South West (81%), with the rates being higher in both areas than in England as a whole during this period (79%)⁶¹. Working-age employment rates were also higher locally (84%) than in the South West (79%) and England (76%).
- 5.102 The Office for National Statistics' (ONS) 2023 Business Register & Employment Survey (BRES) estimated that there were 211,000 workforce jobs in Wiltshire, equating to 8% of the c. 2.6 million jobs across the South West as a whole⁶². Wiltshire supported 14,000 jobs in the construction sector, equating to 7% of total employment locally, which is

⁵⁸ ONS via Nomis (2022) 2021 Census - TS007 - Age by single year

⁵⁹ Wiltshire Council (2015) Wiltshire Core Strategy

⁶⁰ Note that Wiltshire unitary authority figures for 2006/07 to 2008/09 are the sum of delivery in its former constituent districts of Kennet, North Wiltshire, Salisbury and West Wiltshire.

⁶¹ ONS via Nomis (2025) Annual Population Survey – April 2024-March 2024.

⁶² ONS via Nomis (2024) Business Register and Employment Survey: 2023.

broadly in line with – albeit slightly higher than – the sector’s representation in the wider South West region (6%) and nationally (5%).

- 5.103 As of July 2025, there were c. 7,000 people claiming out-of-work benefits in Wiltshire principally for the reason of being unemployed⁶³, accounting for 2% of the resident population aged 16-64, which is broadly in line with – albeit slightly lower than – the proportion across the South West (3%).
- 5.104 Analysis of ONS Jobseeker’s Allowance (JSA) claimant data⁶⁴ – a subset of the overall claimant count presented above – indicates that 115 people were specifically seeking employment in construction-related trades in Wiltshire in July 2025, rising to c. 1,080 across the South West.
- 5.105 A number of early years education providers are present in the locality of the EIA Study Area. Pupil rolls are not published for early years providers, meaning that quantitative analysis cannot be undertaken. The closest providers are Little Robins Nursery (c. 1 mile travel distance from the EIA Study Area), and Queensway Chapel Nursery (c. 1.2 miles), both located in Melksham. Further early years provision is available in neighbouring settlements and surrounds such as ABC Day Nursery in Bowerhill (c. 2.2 miles). It is additionally noted that Forest & Sandridge Church of England (CofE) Primary School and River Mead School (respectively c. 1 mile and 1.4 miles) provide nursery classes for children aged 2+.
- 5.106 Wiltshire Council’s School Places Strategy 2023 – 2027⁶⁵ identifies a total of nine primary schools within the Melksham school planning area. The latest (January 2025) Department for Education (DfE) data⁶⁶ suggests that aggregate gross capacity⁶⁷ for 245 places is currently available across the identified primary schools, not including those which are operating over their maximum capacity⁶⁸. As an aggregate net figure (i.e. accounting for pupil rolls at schools operating over their capacity) DfE data suggest that 117 places are currently available in the primary school planning area. Local primary school capacity includes 77 and 73 available places respectively at The Manor CofE School (c. 1.4 miles travel distance from the EIA Study Area) and Aloeric Primary School (1.9 miles); these schools are therefore located within the 2-mile distance defined in legislation⁶⁹ as the maximum distance that a child under the age of 8 can be expected to travel to access education.
- 5.107 Wiltshire Council identifies one secondary school – Melksham Oak Community School – in the Melksham school planning area. The school has available places to accommodate 293 additional pupils against its maximum capacity of 1,427 places. The school is located

⁶³ ONS via Nomis (2025) Claimant Count: July 2025.

⁶⁴ ONS via Nomis (2025) Jobseeker’s allowance: July 2025.

⁶⁵ Wiltshire Council (2023) School Places Strategy 2023 - 2027

⁶⁶ Department for Education (2025) ‘Get Information About Schools’ [Online]. Available at: <https://get-information-schools.service.gov.uk/>

⁶⁷ Note that DfE data suggests that capacity at the Manor CofE School is 366 places, whilst Wiltshire Council’s School Places Strategy 2023 - 2027 suggests that its capacity is 210 places. An assumption of the lower capacity figure has been applied as a worst-case for the purposes of the assessment.

⁶⁸ Data suggests that Forest & Sandridge CofE Primary School and River Mead School are respectively operating at 57 and 71 places over capacity.

⁶⁹ UK Government (1996) Education Act

c. 2.3 miles walking distance from the EIA Study Area, is and therefore within the 3-mile distance defined in legislation⁷⁰ as the maximum distance that a child over the age of 8 can be expected to travel to access education.

- 5.108 The NHS 'Find a GP' online search tool⁷¹ identifies that the closest GP surgeries to the EIA Study Area are Giffords Surgery (c. 1.4 miles travel distance) and Spa Medical Centre (c. 1.7 miles)⁷².
- 5.109 As outlined in NHS Healthy Urban Development Unit (HUDU) guidance⁷³, the Royal College of GPs recommends that a ratio of one GP (assumed FTE) per 1,800 registered patients is a suitable benchmark to consider the capacity of primary healthcare facilities⁷⁴. Application of this ratio to the current staff and patient numbers at the surgeries identified above⁷⁵ suggests that there is a combined shortfall of c. 7,150 places, equivalent to c. 4 FTE GPs, based on the ratio outlined above. It should be noted that, as a worst-case scenario, this analysis does not include trainee GPs in the calculations⁷⁶. If FTE trainee GPs are included in analysis, aggregate local patient capacity sums to a small surplus of c. 150 places (c. 200 available at Giffords Surgery, and a deficit of c. 50 at the Spa Medical Centre).
- 5.110 The Government's Office for Health Improvement & Disparities (OHID) reports⁷⁷ on various indicators regarding health outcomes in Wiltshire in comparison to regional and national benchmarks, a summary of which are presented below:
- 5.111 Life expectancies for men (81.1 years) and women (84.5) in Wiltshire are higher for women but lower for men than the wider South West region (respectively 84.0 and 83.2) and nationally (79.3 and 83.2 years);
- 5.112 A lower proportion of adults are classified as overweight or obese in Wiltshire (62%) than in the South West (63%) and England (65%). Childhood obesity is also slightly lower in Wiltshire and the South West (where 33% of Year 6 children are obese in both areas) than nationally (36%);
- 5.113 A higher percentage of adults are physically active⁷⁸ in Wiltshire (74%) than in the South West (71%), with the rates in both areas being higher than in England as a whole (67%); and

⁷⁰ UK Government (1996) Education Act

⁷¹ NHS (2025) 'Find a GP' [Online]. Available at: <https://www.nhs.uk/service-search/find-a-gp>

⁷² These surgeries are within 2 miles travel distance, which is considered a suitable accessibility standard for healthcare facilities for potentially 'vulnerable groups' (e.g. older people, disabled people, children), aligning with that for children of primary school-age.

⁷³ Healthy Urban Development Unit (2009) HUDU Planning Contribution Model: Guidance Notes

⁷⁴ Note that this is only an indicative measure of healthcare capacity, and cannot account for site-specific factors, such as the floorspace, age, quality and configuration of individual facilities.

⁷⁵ NHS Digital (2025) General Practice Workforce: 31 July 2025

⁷⁶ Depending on their level of study and experience, many trainee GPs work largely independently, albeit with a degree of supervision. As such, the true level of GP workforce capacity is likely to fall somewhere between the range set out in the text above.

⁷⁷ Office for Health Improvement & Disparities (2025). Local Authority Health Profiles: Wiltshire.

⁷⁸ Defined as undertaking a minimum of 150 minutes of moderate physical activity (e.g. brisk walking; cycling for travel or leisure; playing individual or team sports; gym exercises; gardening) per week.

- 5.114 The proportion of children in relative low-income families⁷⁹ in Wiltshire (15%) is lower than rates recorded regionally (18%) and nationally (22%).

Effects Unlikely/Not Significant

Provision of new housing

- 5.115 A person's ability to access secure housing which is of good quality, affordable and meets their needs, is one of the most important determinants of their physical and mental health.
- 5.116 The Proposed Development will deliver up to 300 new homes of a mix of sizes, types and tenures (including affordable), which will contribute towards meeting local housing needs. Based on the average household size in Wiltshire (2.32) established by the 2021 Census⁸⁰, it is estimated that 300 homes could accommodate c.695 residents.
- 5.117 Whilst a beneficial effect that will make a positive contribution towards meeting local housing needs, it is considered that the Proposed Development's 300 new homes (accounting for 14% of both Wiltshire's adopted Core Strategy annual housing requirements and 14% of one year's worth of historic local annual average housing delivery) are anticipated to be of a scale which would be unlikely to be significant.
- 5.118 Therefore, provision of new housing for people requiring housing in the local impact area is not considered to be significant and will not be considered further in the EIA or reported in the ES.

Access to education facilities (early years, primary and secondary)

- 5.119 Strong, vibrant, sustainable and cohesive communities require good quality, accessible public services and infrastructure. Access to education facilities has a direct positive effect on human health and is vital towards ensuring employment prospects, personal and social development and strong communities.
- 5.120 Based on pupil yield multipliers applied by Wiltshire Council⁸¹, it is estimated that the Proposed Development could generate demand for the following number of school places by phase of education:
- Early years: 39 places⁸²
 - Primary: 93 places
 - Secondary: 66 places
- 5.121 Cumulative Project 1 adjacent to the Proposed Development includes land for a 1 Form of Entry (FE) (210-place) primary school (with early years provision), and the consented

⁷⁹ 'Relative low-income households' defined as those with income below 60% of the median in that year.

⁸⁰ ONS via Nomis (2022) 2021 Census: TS001 - Number of usual residents in households and communal establishments; TS017 - Household size

⁸¹ Wiltshire Council (2017) Developers' Contributions – Education Infrastructure

⁸² Comprising 12 places for 0-2-year-olds, and 27 places for 2-4-year-olds.

development will make proportionate development contributions towards the delivery of the school.

- 5.122 The Proposed Development will similarly make proportionate development contribution payments through the appropriate mechanisms (i.e. S106 and/or Community Infrastructure Levy, CIL) towards the delivery of the primary school on the Cumulative Project 1 site and/or towards other expansions/enhancements to local provision to mitigate its impact in relation to the early years and primary phases of education.
- 5.123 As set out in the baseline, it is noted that 117 net primary school places are currently available in the Melksham planning area, which, alongside the mitigation outlined above, could also contribute towards meeting local demand for primary education generated by the Proposed Development.
- 5.124 As noted in the baseline, the local secondary school (Melksham Oak Community School) has capacity to accommodate a further 293 pupils in addition to its existing pupil roll, and therefore it is considered that this could meet the demand for secondary education generated by the Proposed Development. It is however, noted that, if required to mitigate impacts (subject to forecast future pupil rolls and the impact of cumulative development), the Proposed Development, as with early years and primary education, will make proportionate planning contribution payments towards expanded secondary education capacity in the local impact area.
- 5.125 The specific requirement for and scale and use of any necessary development contributions will be established and confirmed through consultation between the Applicant and key stakeholders such as Wiltshire Council and local education providers.
- 5.126 It is noted that the proposed new primary school in Cumulative Project 1 could have capacity to accommodate early years and primary school demand arising from the Proposed Development in-combination with that generated by Cumulative Project 1, and therefore, if it comes forward, the construction of this new school could potentially be part-funded by any development contributions made in relation to the Proposed Development. It is also noted that:
- Cumulative Project 6 includes the provision of a 'primary school with early years nursery'; and
 - Cumulative Project 12 includes the provision of a '0.4ha of land safeguarded for a nursery'
- 5.127 Development contributions from the Proposed Development could therefore potentially be directed towards other relevant Cumulative Projects, or other alternative sites.
- 5.128 It is noted that cumulative development could result in further increased capacity constraints in relation to education facilities. As such, it is considered that, as set out above in relation to the Proposed Development, relevant Cumulative Projects will mitigate their own impacts as necessary through payment of proportionate development contributions (and/or provision of land/facilities, as noted above) to enable the delivery of new and/or expanded and/or enhanced facilities in the locality.

Therefore no significant adverse residual in-combination cumulative effects are anticipated.

- 5.129 Therefore, given the evident potential for suitable mitigation identified above, access to education facilities (early years, primary and secondary) on local education facilities and pupils is not considered to be significant and will not be considered further in the EIA or reported in the ES.

Access to primary healthcare facilities

- 5.130 Strong, vibrant, sustainable and cohesive communities require good quality, accessible public services and infrastructure. Access to primary healthcare facilities (e.g. GP services) has a direct beneficial effect on human health and is vital towards ensuring that health outcomes and priorities are achieved.
- 5.131 As noted above, an estimated 695 residents could be accommodated in 300 new homes at the Proposed Development, who will generate demand for healthcare facilities. The application of guideline⁸³ patients per GP ratios suggests that the Proposed Development could generate an uplift in demand for 0.4 FTE GPs in the locality.
- 5.132 As set out in the baseline, under a worst-case scenario (not accounting for the workforce capacity of trainee GPs), there is a combined shortfall of c. 7,150 places at healthcare facilities in the locality, equivalent to c. 4 FTE GPs. If accounting for trainee GPs, there is a small surplus of available workforce capacity in the locality of the EIA Study Area (150 places) to accommodate new patient demand. True GP workforce is therefore likely to lie within this range.
- 5.133 Whilst an adverse effect, the new scale of demand generated by the Proposed Development for healthcare facilities (equivalent to 0.4 FTE GPs) is considered to be one which is of a minor level, and therefore unlikely to be significant.
- 5.134 If required in the context of the current baseline and cumulative development, the Proposed Development will make proportionate development contribution payments through the appropriate mechanisms (i.e. S106 and/or Community Infrastructure Levy, CIL) towards the delivery of new and/or expanded and/or enhanced local healthcare provision to the extent which its impacts in relation to healthcare facilities are mitigated in full.
- 5.135 The specific requirement for and scale and use of any necessary development contributions will be established and confirmed through consultation between the Applicant and key stakeholders such as NHS Bath & North East Somerset, Swindon and Wiltshire Integrated Care Board (NHS BNESSW ICB), Wiltshire Council and local healthcare providers.
- 5.136 It is noted that cumulative development could result in further increased capacity constraints in relation to primary healthcare facilities. As such, it is considered that, as set out above in relation to the Proposed Development, relevant Cumulative Projects will mitigate their own impacts as necessary through payment of proportionate

⁸³ NHS Healthy Urban Development Unit (2009) HUDU Planning Contribution Model: Guidance Notes

development contributions (and/or provision of land⁸⁴) to enable the delivery of new and/or expanded and/or enhanced facilities in the locality. Therefore no significant adverse residual in-combination cumulative effects are anticipated.

- 5.137 Therefore, given the minor level of adverse effect prior to any mitigation, and the evident potential for suitable mitigation also identified above, access to primary healthcare facilities for local healthcare facilities and patients will not be considered further in the EIA or reported in the ES.

Access to active travel and sustainable transport options

- 5.138 Active travel and sustainable travel options should be accessible to those living and working at, and otherwise using, new developments to enable and promote healthy and sustainable lifestyles, through facilitating physical activity and zero / low emissions transport, such as walking, cycling and public transport options.
- 5.139 The Proposed Development will incorporate internal foot and cycleways new pedestrian and cycle accesses and routes, which will provide connections between the areas onsite as well as to the surrounding area, including connection to the existing footpath to the south of the EIA Study Area. New pedestrian and cycle accesses and routes will also link to the consented Cumulative Project 1 adjacent to the EIA Study Area's western boundary, connecting the Proposed Development to Melksham and beyond via these modes.
- 5.140 The EIA Study Area's location close to Melksham also enables access to local public transport options (via bus) and to destinations further afield via Melksham Rail Station (which provides services to a range of destinations across the wider locality, region and beyond).
- 5.141 These design measures and accessible location will contribute towards maximising the local residential population's access to active travel and sustainable travel options, which will be beneficial and facilitate enhancement of the health and wellbeing of future users of the (i.e. construction workforce and residents, as well as neighbouring local communities). It is, however, acknowledged that the number of people affected is likely to be relatively low at the scale of the total population in the local and wider impact areas. It is also noted that the topic of Transport and Access has been considered in detail in Chapter.
- 5.142 It is anticipated that relevant Cumulative Projects will implement similar suitable primary mitigation measures as outlined above in relation to the Proposed Development. Therefore no significant adverse residual in-combination cumulative effects are anticipated.
- 5.143 Therefore, access to active travel and sustainable transport options for the Proposed Development's construction workforce, residents and neighbouring local communities are unlikely to be significant and will not be considered further in the EIA or reported in the ES in the context of the topic of socio-economics and human health.

⁸⁴ It is noted that Cumulative Project 5 provides 'land for extension of medical facilities or community facility'.

Access to open space and sports & recreation

- 5.144 Providing secure, convenient and attractive open / green space, public amenity space and facilities for sports and leisure activities can lead to increased levels of physical activity and reduce levels of heart disease, strokes and other ill-health problems that are associated with both sedentary occupations and stressful lifestyles. There is also a growing body of evidence to suggest that access to open spaces and facilities for exercise is important in helping to maintain and / or improve mental health⁸⁵.
- 5.145 The Proposed Development will provide strategic green infrastructure and open space of a range of typologies and uses, both formal and informal, alongside playspace provision for children and young people. The neighbouring consented Cumulative Project 1 will also provide open space which will also be accessible to the Proposed Development's residents and neighbouring local communities.
- 5.146 A variety of further open space and recreation provision already exists in the surrounding area. Existing local built provision includes Melksham Community Campus (providing gym, swimming pool, indoor bowls and a sports hall and courts). Further open space and recreation provision is available elsewhere in Melksham and surrounds, to meet the full range of needs.
- 5.147 It is anticipated that relevant Cumulative Projects will implement similar suitable primary/inherent mitigation measures as outlined above in relation to the Proposed Development. Therefore no significant adverse residual in-combination cumulative effects are anticipated.
- 5.148 Therefore, given the scale of existing and proposed local provision, access to open space and recreation facilities for the Proposed Development's residents and neighbouring local communities will not be considered further in the EIA or reported in the ES.

Employment and training opportunities generated during construction

- 5.149 Employment and income are key determinants of personal and societal socio-economic and physical and mental health, and access to training is key to ensuring people are able to access fulfilling future employment opportunities over the long term. The construction of new development creates temporary job opportunities in the construction sector and can improve access to training opportunities by delivering apprenticeships and other employment and training programmes.
- 5.150 The Proposed Development will generate new direct employment and training opportunities in the construction sector and will also support indirect and induced jobs through supply chain expenditure and onward expenditure of employee wages. However, whilst a beneficial effect which could contribute towards meeting local employment needs on a temporary and medium-term⁸⁶ basis, the number of new construction stage jobs is anticipated to be of a scale which would be unlikely to be significant.
- 5.151 Similarly, whilst the Proposed Development could deliver new training opportunities, such as apprenticeships and/or placements during construction (which will be

⁸⁵ NHS Healthy Urban Development Unit (2019) Rapid Health Impact Assessment Tool (4th Edition)

⁸⁶ Defined as between 1 and 10 years.

dependent on construction contractors), it is considered that these are likely to comprise only a limited proportion of the total jobs supported during the construction stage. Whilst a beneficial effect which could contribute positively towards meeting local needs for apprenticeship and other training opportunities, their delivery is anticipated to be of a scale which would be unlikely to be significant.

- 5.152 It is anticipated that relevant Cumulative Projects will generate similar beneficial effects as outlined above in relation to the Proposed Development, albeit not at a scale which is significant in combination with the Proposed Development, given the temporary and medium-term nature of cumulative construction stage employment effects.
- 5.153 Therefore, employment and training opportunities generated during construction for the labour force in the local and wider impact areas is not considered to be significant and will not be considered further in the EIA or reported in the ES.

Social cohesion, inclusive design and access to community facilities

- 5.154 Developments should connect with existing communities (for example through layouts and access points which avoid physical barriers and severance), whilst land use and spaces should encourage social interaction, taking into account principles of inclusive and age-friendly design.
- 5.155 The EIA Study Area is currently predominantly agricultural land, and as such, the Proposed Development will result in no displacement of any existing residential communities. The adjoining consented Cumulative Project 1 will enable coherent integration with the forthcoming residential areas and social infrastructure and other amenities, as well as with the neighbouring settlement of Melksham.
- 5.156 The Proposed Development will provide residential amenities such public open space, including play spaces. These uses will foster social interaction and provide a focal point for community activities.
- 5.157 New public realm at the Proposed Development will be implemented with a strong consideration of principles related to inclusive design, taking account of guidance⁸⁷ regarding best practice for ensuring that developments can be accessed and used by all in a way that effectively fosters social connections, recognising and accommodating differences in the way people use the built environment as a result of factors such as age and disability. The new public realm will therefore further support local social cohesion and accessibility. Furthermore, it is noted that the neighbouring Phase 1 development (Cumulative Project 1) provides land for a primary school, Class E(g)(i)) and Class E(g)(ii)) employment floorspace (up to 5,000 sqm) and land for a mixed-use hub centre (Class E and F), and will also provide open space. This cumulative provision, if delivered, could also be accessible to future residents of the EIA Study Area and neighbouring communities.
- 5.158 It is anticipated that other relevant Cumulative Projects will implement similar suitable primary/inherent mitigation measures as outlined above in relation to the Proposed

⁸⁷ Ministry of Housing, Communities and Local Government (2019) Planning Practice Guidance: Housing for older and disabled people – Inclusive Design (para 017)

Development. Therefore no significant adverse residual in-combination cumulative effects are anticipated.

- 5.159 Therefore, given the new on-EIA Study Area and forthcoming new neighbouring local provision, social cohesion, inclusive design and access to community facilities for the Proposed Development's residents and neighbouring local communities is not considered to be significant and will not be considered further in the EIA or reported in the ES.

Crime reduction and community safety

- 5.160 EIA Study Areas should be kept secure during construction to ensure that the potential for crime and anti-social behaviour is minimised. Once operational, developments should incorporate design elements and EIA Study Area management measures to help 'design out' crime, to help people feel secure, again, minimising the potential for crime and anti-social behaviour.
- 5.161 EIA Study Area security arrangements during the construction stage will be in line with the requirements set out in the Construction (Design and Management) Regulations 2015⁸⁸. The design of the Proposed Development will be informed by 'Secure by Design' principles and appropriate design measures will be implemented to ensure that the potential for crime and anti-social behaviour is minimised once operational.
- 5.162 It is anticipated that other relevant Cumulative Projects will implement similar suitable primary/inherent mitigation measures as outlined above in relation to the Proposed Development. Therefore no significant adverse residual in-combination cumulative effects are anticipated.
- 5.163 Therefore, crime reduction and community safety for the Proposed Development's residents, workers and existing local communities is not considered to be significant and will not be considered further in the EIA or reported in the ES.

Access to healthy food

- 5.164 Access to healthy and nutritious food can improve diet and prevent chronic diseases related to obesity. Healthy food options should be available and easily accessible to those using and working at new developments to enable and promote healthy lifestyles.
- 5.165 There are also a number of large supermarkets located in Melksham (including Co-op, Morrisons, Sainsbury's, Waitrose and Lidl, the closest being Co-op, c. 1 mile travel distance from the EIA Study Area) which will be accessible for new residents of the EIA Study Area.
- 5.166 It is also noted that the Cumulative Project 1 will provide land for flexible non-residential uses, including retail. Whilst end-use occupiers have not been confirmed at this stage, it is likely that a proportion of floorspace will be occupied by convenience retail uses from which healthy food options will be available. This cumulative provision, if delivered, could also be accessible to future residents of the EIA Study Area and neighbouring communities.

⁸⁸ Secretary of State (2015) Construction (Design and Management) Regulations 2015.

- 5.167 It is anticipated that other relevant Cumulative Projects will benefit from similar suitable inherent locational characteristics as outlined above in relation to the Proposed Development and/or will deliver new on-site provision by way of primary/inherent mitigation. Therefore no significant adverse residual in-combination cumulative effects are anticipated.
- 5.168 Therefore, access to healthy food for the Proposed Development's residents and neighbouring local communities is not considered to be significant and will not be considered further in the EIA or reported in the ES.

Other human health-related effects

- 5.169 Health 'determinants' are the social, economic and environmental conditions which determine the health and wellbeing of a local population. While there is no definitive list that is applicable to every development, guidance published by the NHS Healthy Urban Development Unit⁸⁹ (HUDU) and the Wales Health Impact Assessment Support Unit (WHIASU)⁹⁰ provide an assessment matrix that identifies broad determinants of health. Consideration of health determinants most applicable to the topic socio-economics and human health have been assessed in this chapter.
- 5.170 Other health determinants which are relevant to the Proposed Development, and which will be assessed through other specialist technical assessments within the EIA include air quality, noise and climate change, which are addressed separately in this EIA Scoping Report.
- 5.171 Therefore, other human health-related effects are not considered to be significant and will not be considered further in the EIA or reported in the ES in the context of socio-economics and human health.

Climate Change

Baseline

- 5.172 It is accepted that the release of GHGs will ultimately contribute to this global challenge if not sufficiently mitigated. As such, the identification of specific receptors within a specific area cannot be undertaken in the same way as other disciplines.
- 5.173 However, emissions from the Proposed Development have been provided in the context of Wiltshire Council, using background data from a range of sources. It is within this context that the potential significance of the emissions arising can be identified.
- 5.174 The annual GHG emissions for Wiltshire are 2,905,300 tonnes CO₂e per annum (2023)⁹¹. This compares to 3,000,000 tonnes CO₂e estimated in the WC's Climate Strategy (2022)⁹². For the purposes of this document the lower figure has been used as the assessment baseline, as any impact from the Proposed Development will be proportionally greater. A summary of the baseline is provided in the **Table 5.1**.

⁸⁹ NHS Healthy Urban Development Unit (2019 Rapid Health Impact Assessment Tool (4th Edition)

⁹⁰ Wales Health Impact Assessment Support Unit (2020) Health Impact Assessment: A Practical Guide

⁹¹ Data available here: <https://carboncopy.eco/local-climate-action/wiltshire>, 2023

⁹² [Climate strategy and delivery plans - Wiltshire Council](#), adopted 2022

5.175 More generally, the climate in Wiltshire sees average annual temperatures of 11°C, which remains slightly higher than the UK average, and which has increased by about 1.5°C since the 1960s. Wiltshire sees highest average temperatures in July of c.21°C, and lowest average temperatures of 1.5-2°C in January. It sees 150 rainy days per year resulting in 890mm of rain across a 12-month period. This has remained relatively stable over time, but intensity and timing of rain has changed. This is in line with much of the south of the UK, where Wiltshire is seeing shifting seasonal patterns with warmer temperatures in early spring and generally wetter autumn periods.

Effects Unlikely/Not Significant

5.176 A range of calculations have been undertaken in respect of the Proposed Development to establish the likely carbon dioxide emissions arising from the EIA Study Area, examining the issue from two different perspectives:

- Perspective 1 – ‘Operational’ emissions, those arising from building energy use related to heating, hot water, and other electricity use within the home. Both annual emissions and a 30 year forward look on those emissions have been included, taking account of the expected decarbonisation of the Grid.
- Perspective 2 – Whole Life Carbon (WLC) emissions, those arising from the entire lifespan of the buildings, including construction and ongoing use.

5.177 Without the level of detail required to make an in-depth assessment of either perspective at this pre-planning stage, the following assumptions have been used:

- A typical mix of properties shown in **Table 5.2**, broken down between flats and 2/3/4/5 bedroom houses;
- Construction period of 6 years commencing in 2027, with 50 homes completed each year;
- Baseline estimates of WLC using a kgCO₂e/m² metric;
- There will be no fossil fuels on site, and no use of biomass or wood burning; and
- A baseline energy strategy (see below for more details) that incorporates a Future Homes Standard level of energy efficiency, heating and hot water provided by heat pumps, and extensive use of solar PV across the development – all at individual property level.

5.178 The forward prediction of emissions to 2050 and beyond uses the Treasury’s Green Book Supplementary Guidance: valuation of energy use and greenhouse gas emissions for appraisal⁹³. This data provides the estimated carbon emission factors Grid Electricity, which is the sole fuel proposed on the development in buildings, using the metric kgCO₂/kWh. The baseline data for Wiltshire is provided in the table below.

⁹³ Available here: [Green Book supplementary guidance: valuation of energy use and greenhouse gas emissions for appraisal - GOV.UK](#), last updated November 2023.

Table 5.1: Baseline Wiltshire data

Metric	Value	Unit
Wiltshire (Baseline)		
Total Annual Wiltshire Emissions (current)	2,905,300	tCO ₂ e ⁹⁴
Of which residential	593,700	
Total number of households in Wiltshire	232,159	No. ⁹⁵
Current average household emissions in Wiltshire	2.56	tCO ₂ e
Wiltshire's lifetime emissions to 2050 - estimate	33,410,950	tCO ₂ e ⁹⁶

Emissions arising from the construction process

- 5.179 The larger proportion of emissions given the low carbon approach to ongoing energy use (described above) will be embodied carbon in the construction process and transport (the latter of which is either dealt with by the transport consultant or is outside the control of the Applicant). There is therefore an increasing focus on WLC regarding the move towards net zero emissions by 2050. Various studies indicate typical values at up to 1,200kgCO₂e/m² of building floor area, however where this can be considered at an early design stage and where carbon impact of materials, construction methods and processes are accounted for properly in decision making, this can be reduced. The current design process is not at the materials specification stage, so primary mitigation measures in this respect are limited. However, an achievable reduction in emissions can be attained through good practice levels of WLC emissions, reducing the baseline above by around 25%, down to 900kgCO₂e/m².

Emissions arising from operations

- 5.180 Emissions from buildings as a result of burning fossil fuels like gas have, historically, been the largest proportion of emissions from new buildings. However, changes to Building Regulations, and the move towards the Future Homes Standard (FHS), and commitments within planning frameworks on emissions, have 'shifted the dial' considerably in respect of operational carbon emissions. The Applicant is committing to a fossil fuel free development. In addition to meeting very high thermal efficiency standards, all heating will be provided using air source heating, and this will be complemented by the use of solar panels on individual properties. These technologies have therefore been modelled and can be secured by condition if required, but depending on timings they may also be required by legislation. The impact of these assumptions means emissions will not be significant, and this is demonstrated in the table below.

⁹⁴ <https://carboncopy.eco/local-climate-action/wiltshire>

⁹⁵ [UK GOV Dwelling Stock Estimates](#)

⁹⁶ Assumes Wiltshire has achieved net zero carbon by 2050 (in line with statutory national requirements), diminishing from current level at consistent annual rate to 2050 = 0

Table 5.2: Operational Greenhouse Gas Emissions

Metric	Value	Source / Detail / Assumptions
Proposed Development		
Emissions from Operational Energy Use		
Mix		
1 Bed Flat	1.5%	Typical mix for developments of this type: lower density family / estate housing
2 Bed Flat	3.5%	
2 Bed	15%	
3 Bed	40%	
4 Bed	35%	
5 Bed	5%	
Construction Period	6 years	Assumes 50 completions per year, with average split of annual completions aligned to overall mix above.
Carbon emissions factor - electricity (all electric development)	Various, changes annually (kgCO ₂ /kWh)	Green Book supplementary guidance: valuation of energy use and greenhouse gas emissions for appraisal (HMT).
Total lifetime operational emissions of all residential properties (30 years)	259tCO ₂	Assumes high efficiency dwellings broadly aligned to requirements of the Future Homes Standard, heat pumps for space heating and hot water and use of PV arrays on individual properties. No gas for heating or cooking; no fossil fuels or burning of wood/biomass for heat.
Average annual operational emissions of all residential properties over 30 year period	9tCO ₂ /a	
Average annual operational emissions of all residential properties first full year complete	21tCO ₂ /a	
Proportion of total annual Wiltshire emissions from the Proposed Development (operational energy)	0.0007%	Once development complete, first full year of operation, calculated against current emissions levels for ease.
Comparator - average annual emissions for a dwelling as a % of the current Wiltshire figure (2.56t)	6.8967%	Actual average on completion is around 0.07tCO ₂ .
Whole Life Carbon Estimate		
Baseline /standard construction assumption	1,200 kgCO ₂ e/m ²	Assumes an enhanced 'better' or 'good practice' target can be implemented via planning process.
Enhanced construction assumption delivered through good practice	900 kgCO ₂ e/m ²	

Metric	Value	Source / Detail / Assumptions
Weighted average floor area per dwelling - estimate, low density family housing	100m ²	Typical average area for lower density family housing
Total number of dwellings	300	As per proposals for Proposed Development
Total whole life carbon emissions - estimated, kgs	36,000,000 kgCO ₂ e	
Total whole life carbon emissions - estimated, t	36,000 CO ₂ e	
Percentage of total Wiltshire lifetime emissions arising from Proposed Development (WLC)	0.11%	

5.181 The table shows that, taking the reasonable assumptions into account:

- Operational emissions will be less than one thousandth of one percent of the overall emissions for Wiltshire UA once fully complete / built out and occupied;
- The operational emissions from a single dwelling at Blackmore Farm could be up to 94% lower than typical homes in the authority; and
- WLC carbon emissions from the Proposed Development are calculated to be about one tenth of 1% of the Wiltshire's ongoing operational emissions to 2050.

5.182 In this respect the carbon impact is within the margin of error of calculations for emissions for Wiltshire alone. This should not be read as an indication that the Applicant and author consider the emissions are not important to address, rather that from an EIA / ES perspective they cannot be deemed 'significant'. The importance of the matter is being addressed through the planning process, with mitigation being implemented in the form of a low carbon energy building performance strategy, whilst targeting lower levels of WLC can be achieved through the ongoing design and construction process.

5.183 Therefore, the impact of GHG emissions arising is not considered to be significant and will not be considered further in the EIA or reported in the ES.

Lighting

Baseline

5.184 The EIA Study Area is primarily characterised by agricultural land use, so is predominately unlit. There is minimal lighting associated with the farm buildings and the small number of residential dwellings located adjacent north of the EIA Study Area. Any light spill from these sources onto the EIA Study Area is expected to be limited.

- 5.185 Sandridge Common (A3102) is unlit and therefore light is limited from passing vehicle headlights along the northern boundary of the EIA Study Area. However, existing hedgerows are likely to obstruct this light.
- 5.186 Given the rural context of the EIA Study Area with a number of residential dwellings and farms to the north, the existing lighting conditions of the EIA Study Area have been defined through professional judgement as Environmental Zone E2 'sparsely inhabited rural areas, village or relatively dark outer suburban locations' (low district brightness) in accordance with the Institution of Lighting Professionals Guide⁹⁷.

Effects Unlikely/Not Significant

- 5.187 Lighting within this section focuses on statutory nuisance. Effects from lighting associated with construction and operation of the Proposed Development on ecological receptors and landscape character and views (where relevant) is considered in **Chapter 6** and **Chapter 7** respectively.

Disturbance to existing residents due to obtrusive light during construction

- 5.188 Obtrusive light comprises any adverse effects of artificial lighting from light spill and glare as a result of temporary construction activities.
- 5.189 Lighting will be required during construction activities, although due to likely working hours this would be predominantly during the winter months. It is anticipated that lighting would be controlled through the implementation of best practice measures, informed by the ILP's 'Guidance Note 01/21'²⁸. The reduction of obtrusive light' and would include:
- The use of sufficient lighting units for the task in hand to avoid the need for tall, wide beam lighting units;
 - Limiting construction lighting and / or perimeter security lighting near to existing residential properties;
 - The reduction of fixed lighting outside working hours; and
 - Any requirements for ongoing monitoring and liaison with stakeholders.
- 5.190 It is anticipated that the above measures will be secured / implemented through the production of a CEMP by the appointed contractor and submitted to Wiltshire Council for approval prior to commencement of construction activities.
- 5.191 These tertiary mitigation measures would be considered an integral part of the Proposed Development and considered as part of the PEMP. Therefore, effects related to the disturbance of nearby residents due to obtrusive light from construction activities are unlikely to be significant and will not be considered further in the EIA or reported in the ES.

⁹⁷ Institution of Lighting Professionals (2021). Guidance Note 01/21: Guidance Notes for the reduction of obtrusive light. [Accessed 12/09/2025].

Disturbance to existing residents due to obtrusive light during operation

- 5.192 Lighting will be installed as part of the Proposed Development at the EIA Study Area access, along internal circulation routes as well as within landscaping areas, where required.
- 5.193 There are a limited number of residential dwellings located to the north of the EIA Study Area. All permanent lighting installations associated with the Proposed Development will be designed and implemented in accordance with relevant standards and best practice guidance.⁹⁸ These mitigation measures would be considered an integral part of the Proposed Development and considered as part of the PEMP. Therefore, effects related to the disturbance of nearby residents due to obtrusive light from operation are unlikely to be significant and will not be considered further in the EIA or reported in the ES.

Increases in sky glow

- 5.194 The Proposed Development is not anticipated to contribute significantly to sky glow as all temporary / permanent lighting installations will be designed / installed in line with best practice and relevant standards (e.g. Commission Internationale l'Eclairage (CIE) (1997) 126: Guidelines for Minimising Sky Glow⁹⁹), which includes the requirements to minimise upward light emitted and contributions toward sky glow. Therefore, effects related to increases in sky glow are unlikely to be significant and will not be considered further in the EIA or reported in the ES.

Waste

Baseline

- 5.195 As the EIA Study Area is primarily agricultural land, there are minimal waste arisings generated other than from standard agricultural practices.

Effects Unlikely to be Significant

Waste generation during construction

- 5.196 As there are no existing structures / buildings on-site, there will be no demolition as part of the Proposed Development.
- 5.197 The Proposed Development will generate waste during construction as a result of site clearance and earthwork activities (including removal of vegetation and topsoil). **Chapter 4** assumes that a cut and full sub soil balance will be achieved on the EIA Study Area. A surplus of top soil material can be reduced through re-use as landscaping fill. Any material recovered for purposes of re-use within the EIA Study Area will be subject to screening to ensure the absence of contamination or hazardous materials, in line with standards and guidance including CL:AIRE's The Definition of Waste: Development

⁹⁸ Including: CIE 150: 2017 – Guide on the Limitation of the Effects of Obtrusive Light from Outdoor Lighting Installations, 2nd Edition; ILP GN01 - Guidance Notes for the Reduction of Obtrusive Light 2021; BS 5489-1 : 2020 – Code of Practice for the Design of Road Lighting; SLL Guide to Limiting Obtrusive Light 2012; SLL Lighting Handbook 2018; CIBSE LG 6 – The Exterior Environment 2016; and ILP Guidance Note 08/18 Bats and Artificial Lighting in the UK.

⁹⁹ CIE (1997) 126: Guidelines for Minimising Sky Glow.

Industry Code of Practice¹⁰⁰. This means that excavated materials that are recovered can be re-used provided they achieve / are treated to a standard such that they are fit for purpose and unlikely to introduce contaminants / pollution.

- 5.198 Other sources of waste during the construction stage are assumed to relate to construction materials (including packaging). It is anticipated that waste produced during construction would be controlled through the implementation of a CEMP, secured by planning condition. The CEMP will be informed by the waste provisions of the Environmental Protection Act 1990¹⁰¹ and the Environmental Protection (Duty of Care) Regulations 1991¹⁰² and will set out the principles and legal requirements relating to waste (including hazardous waste).
- 5.199 These tertiary mitigation measures are considered an integral part of the Proposed Development and will be considered as part of the Schedule of Mitigation. Therefore, waste generated during construction is unlikely to be considered significant and will not be considered further in the EIA or reported in the ES.

Waste generated during operation

- 5.200 Once operational, a quantity of domestic waste will be generated from the Proposed Development. Contaminative or hazardous waste materials are not expected.
- 5.201 An estimate of the volume of waste generated by the Proposed Development during operation has been made with reference to BS 5906:2005 Waste Management in Building – Code of Practice¹⁰³ which identifies the typical weekly waste arisings from a number of project types. For ‘domestic use’ the guide suggests that the weekly waste arisings is equal to the number of dwellings x [(70 litres x average number of bedrooms) +30]. Given the outline nature of the Application, full details of the housing mix are not known, but a worst-case assumption of the average number of bedrooms for the residential dwellings has been made at an average of 4 bedrooms to allow the calculations.
- 5.202 On this basis the residential element of the Proposed Development would be considered to generate approximately 84,030 litres (l) a week, approximately 4,369,560l per annum (assuming 52 weeks per year).

¹⁰⁰ CL:AIRE (2011) The Definition of Waste: Development Industry Code of Practice (Version 2).

¹⁰¹ Environmental Protection Act (1990) c. 43. Available at: <https://www.legislation.gov.uk/ukpga/1990/43/contents>.

¹⁰² Environmental Protection (Duty of Care) Regulations (1991) c. 2839. Available at: <https://www.legislation.gov.uk/uksi/1991/2839/made#:~:text=The%20duty%20requires%20such%20persons,person%20or%20to%20a%20person.>

¹⁰³ British Standard (2005). BS 5906:2005 Waste management in buildings – Code of practice. Available at: <https://www.rbkc.gov.uk/pdf/BS5906-2005.pdf> [Accessed 12/09/2025].

Table 5.3: Estimated Operational Waste

Proposed Use	Quantum	Equation for Weekly Waste Arisings	Estimated Weekly Waste Generation (litres / tonnes)
Residential	300 dwellings	number of dwellings × {(volume arising per bedroom [70 l] × average number of bedrooms) + 30}	84,030 / 30

5.203 Wiltshire Council collected 210,778 tonnes of household waste in April 2023 to April 2024, 43% of which was recycled¹⁰⁴.

5.204 The Proposed Development would increase the total household waste by 0.01%. It should be noted that this does not take account of any waste arising being reused, recycled or diverted from landfill by another means, which based on Wiltshire's recycling rate detailed above would reduce the waste for landfill to 12.9 tonnes. The Proposed Development will be designed in order to take account of appropriate provision for waste storage and handling facilities/areas, inclusive of areas for segregation of waste and recycling. In addition, it is assumed that all waste storage/handling facilities will be designed in accordance with BS 5906:2005. At the detailed stage, a Waste Management Strategy will set out the principles, strategy and targets for the management and storage of waste and maximise recycling, in accordance with Wiltshire Council's policy WCS6: Waste Reduction and Auditing¹⁰⁵, will be prepared and submitted.

5.205 Therefore, waste generated during operation is unlikely to be considered significant and will not be considered further in the EIA or reported in the ES.

Major Accidents and Disasters

Baseline

5.206 The EIA Study Area does not intersect a pipeline or hazard zone and does not lie within the HSE consultation distance of a major hazard site or major accident hazard pipeline.¹⁰⁶ However, there is an existing overhead electricity power cable that crosses the northern part of the EIA Study Area from the unnamed road to the east to of the EIA Study Area to the A3102 Sandridge Common to the north. This is expected to remain in situ or with appropriate set backs). There are no COMAH sites within 3 miles of the EIA Study Area¹⁰⁷.

Effects Unlikely / Not Significant

5.207 A qualitative appraisal of major accidents and / or disasters considered relevant to the Proposed Development is presented in **Table 5.4**. As part of the appraisal the factors

¹⁰⁴ <https://www.wiltshire.gov.uk/article/10048/What-happened-to-your-household-waste-and-recycling-last-year>

¹⁰⁵ Wiltshire and Swindon Waste Core Strategy 2006 – 2026 – Development Plan Document, Adopted July 2009

¹⁰⁶ Health and Safety Executive's Planning Advice Website (<https://pa.hsl.gov.uk/>) accessed 08/09/25.

¹⁰⁷ <https://notifications.hse.gov.uk/comah2015/Search.aspx>

that have been considered include the understanding of the likelihood of a risk event occurring, the consequence of such an event and the mitigation identified to control / manage risks to be 'As Low as Reasonably Practicable' (ALARP). ALARP describes the level to which stakeholders (such as the HSE) expect to see risks controlled, taking account of being 'reasonably practicable' (i.e. weighing a risk against the effort, time and money needed to control it).

Table 5.4: Appraisal of the risk of major accidents and / or disasters

Effect	Appraisal
Major accidents associated with nearby COMAH sites	The Proposed Development would not be classified as a COMAH site nor is it within 3 miles of a registered COMAH site. Furthermore, there are stringent controls and management regimes in place COMAH sites noted above in line with legislative requirements. Therefore, the risk of major accidents from these sites is considered to be ALARP.
Major accidents associated with underground utilities	During the construction stage, working areas will be secured with restricted access so only suitably qualified personnel are present. Works to confirm the location of utilities will be undertaken before the commencement of activities in liaison with the relevant operators. Good practice working measures will be put in place as part of the CEMP in line with the Construction (Design and Management) Regulations 2015 and other health and safety regulations, such as the preparation of specific method statements and making workers aware of the location of utilities and their easements where works are undertaken in proximity to utilities. In addition, relevant HSE guidance will be adhered to, including Avoiding danger from underground services ¹⁰⁸ . With such measures in place, the risk is considered to be ALARP.
Major accidents associated with overhead powerlines	There is an existing overhead electricity power cable that crosses the northern part of the EIA Study Area. During construction, safe working methods will be implemented and included in the CEMP. This will include adherence to relevant health and safety legislation including GS6 Avoiding danger from overhead lines ¹⁰⁹ and ensuring construction workers are briefed on the appropriate methods of working and the easements. During operation, the overhead electricity power cable will either remain in situ or be diverted but will be delivered by the DNO. With such measures in place, the risk is considered to be ALARP.
Major accidents caused by ground subsidence and	As detailed above there are no significant geotechnical issues identified by the preliminary work.

¹⁰⁸ HSE (2014) Avoiding danger from underground services HSG47.

¹⁰⁹ HSE (2013) GS6 Avoiding danger from overhead lines.

Effect	Appraisal
associated structural / building collapse	As part of the CEMP, good practice working measures and emergency measures will be put in place in accordance with the Construction (Design and Management) Regulations 2015. All earthworks and foundation design will be in accordance with relevant standards and guidance, including but not limited to CIRIA Report C572: Treated ground engineering properties and performance ¹¹⁰ , British Research Establishment document FB75: Building on Fill - Geotechnical Aspects ¹¹¹ , British Standard 6031:2009: Code of Practice for Earthworks ¹¹² and Building Regulations Approved Document A - Structure ¹¹³ . With such measures in place, the risk is considered to be ALARP.
Major accidents associated with fire	As part of the CEMP, construction works will be undertaken in line with Fire Prevention on Construction Sites: Joint Code of Practice ³⁰ . All buildings will be designed with appropriate fire prevention / control measures (e.g. fire doors, extinguishers, etc.) and all external facades and materials will meet the necessary fire resistance standards set out within relevant legislation (e.g. the Building Regulations). Fire management measures, including smoke detectors etc.) will also be installed within the Proposed Development. With such measures in place, the risk is considered to be ALARP.
Major accidents on the local road network	The management of construction vehicles in and out of the EIA Study Area and the enforcement of stringent safety standards reduces the risk of major accidents to a low level, both in terms of frequency and likelihood. As such, pedestrian safety is considered to be well defined and controlled in line with standard highways requirements. The potential for major transport accidents during the construction stage will be mitigated by a construction logistics / traffic management plan as part of the CEMP. This will include measures such as a planned route(s) for construction traffic to reduce the risk to road users, restricting deliveries to certain periods and ensuring the vehicles are well maintained, implemented through a CTMP. The new accesses and vehicle circulation through the Proposed Development will all be designed in accordance with relevant guidance / standards. With these measures in place, the risk is considered to be ALARP.
Major accidents associated with risk of UXO onsite	A preliminary Unexploded Ordnance (UXO) study has been undertaken (Appendix 5.2) which has concluded that no significant military activity affecting the site has been identified and that there are no readily available records indicating that

¹¹⁰ J A Charles and K S Watts (2002). Treated ground - engineering properties and performance (C572).

¹¹¹ BRE (2015) FB75 Building on fill: geotechnical aspects (3rd edition).

¹¹² British Standard 6031:2009 Code of practice for earthworks.

¹¹³ HM Government (2013) Approved Document A – Structure.

Effect	Appraisal
	the site was bombed and a detailed desk study is not considered essential for this site. Nevertheless, appropriate mitigation measures will be implemented as part of a CEMP, such as communication to all construction workers on UXO risks, safety training by a competent expert and the attendance of UXO supervisors during the groundworks (if appropriate). With such measures in place, the risk is considered to be ALARP.
Major accidents as a result of malicious attacks (e.g. vandalism, arson or terrorism)	Due to its nature, the Proposed Development is unlikely to attract terrorist activities. Whilst targeted acts of vandalism or arson cannot be fully mitigated, the adoption of appropriate security measures at the construction stage and operational stages (such as security lighting and CCTV) will help to minimise the likelihood of such events occurring. It is also assumed that appropriate emergency planning has been undertaken by Wiltshire Council and local emergency services. Given this, the risk is considered to be ALARP.
Major accidents during construction works	All works will be undertaken in accordance with relevant legislation, standards and guidance, including the Construction (Design and Management) Regulations 2015 and HSE's health and safety in construction¹¹⁴. Appropriate method statements and risk assessments will be undertaken prior to the commencement of specific activities. With these measures in place, the risk is considered to be ALARP.

- 5.208 Based on the evidence provided in **Table 5.2**, although there is the potential for a wide range of major accidents and disasters that could occur, the risk is considered to be ALARP due to the management regimes required under established legislative requirements or during the design process.
- 5.209 The EIA Regulations do not specify the need for the consideration of natural disasters. However, for completeness, this has been considered.
- 5.210 The probability, frequency and likelihood of natural disasters arising from climatic occurrences (i.e. hurricanes) are considered to be very low due to the natural climatic condition of the UK within the global climate system. Specific geological events (i.e. earthquakes, tsunamis, volcanic incidents, etc.) are also considered to be very low due to the general absence of required geological conditions (i.e. area of tectonic plate interaction) within or in proximity to the UK. Although earthquakes have occurred within the UK, the magnitude of such events has generally been low.
- 5.211 Therefore, effects related to the risk of major accidents and / or disasters are unlikely to be significant and will not be considered further in the EIA or reported in the ES.

¹¹⁴ The Construction (Design and Management) Regulations 2015 - HSE [Accessed 12/09/2025].

Agricultural Land and Soil Resources

Baseline

- 5.212 A detailed Agricultural Land Classification (ALC) Survey has been undertaken which includes the EIA Study Area. The results of the survey confirmed the ALC of the EIA Study Area is Grade 3b. The soil survey carried out confirmed the presence of slowly permeable clay soils which are seasonally waterlogged for long periods over the winter. Details of the ALC and soil survey are provided in **Appendix 5.3**.

Effects Unlikely to be Significant

Loss of Agricultural Land

- 5.213 Construction activities to support the Proposed Development will result in the permanent loss of agricultural land, with potential implications for food production. However, the EIA Study Area is confirmed to be ALC Grade 3b which is not which is not considered to be Best and Most Versatile (BMV) agricultural land (and therefore lower quality) and its loss is not considered to be significant.
- 5.214 Therefore, effects related to the loss of agricultural land and effects on food production are unlikely to be significant and will not be considered further in the EIA or reported in the ES.

Loss of / damage to Soil Resource

- 5.215 Soil is a finite resource that fulfils many important functions and services for society in addition to the production of food and fibre, and it is important that soil resources are conserved and enhanced. During the construction stage, damage to, and loss of, topsoil could occur if other dissimilar materials, such as subsoil, were stockpiled directly on it without a separating layer. Similarly, loss of the resource could result from the mixing of topsoil, subsoil and other materials during stockpile placement or removal.
- 5.216 There is also a risk of long-term damage to soil structure, and the loss of potentially valuable soil, if there is uncontrolled trafficking of land and soil by heavy machinery, especially wheeled machinery.
- 5.217 Biodegradation of topsoil would occur if it is compacted in storage, stockpiled when wet, if stockpiled in the medium-to-long-term, or covered by soil stores for significant periods. Therefore, permanent, direct, adverse impacts may arise from: disposing of soil or re-using it for inappropriate purposes that do not meet the many beneficial functions of soil; by mixing incompatible soil resources; and by poor management of the soil resource.
- 5.218 The principal measures to mitigate the impacts on soil resources will be set out in a Soil Resource Management Plan (SRMP) as part of the CEMP, to be secured by a planning condition. The plan will confirm the different soil types; the most appropriate re-use for the different types of soils; and the proposed methods for handling, storing and replacing soils on-site.
- 5.219 The aim of the SRMP will be to re-use as much of the surplus soil resources in the design of open spaces and green infrastructure; and to maintain the quality of soils by following

good practice guidance on soil handling and storage, particularly to avoid compaction and biodegradation.

- 5.220 With the adoption of appropriate mitigation for the handling and restoration of soils, as part of the SRMP, most soils will be able to continue their various ecosystem functions, principally as a medium for producing biomass; for storage and cycling of water and carbon; and for supporting habitats, biodiversity and landscape planting.
- 5.221 Therefore, effects related to the loss of a soil resource are unlikely to be significant and will not be considered further in the EIA or reported in the ES.

Limitations

- 5.222 To ensure transparency within the assessment process, the following limitations and assumptions have been identified for the topics scoped out in this Chapter.
- 5.223 The following limitations and assumptions have been identified with regards to Cultural Heritage:
- It is assumed that the HER data, as curated by Wiltshire Council, and the Historic England data, that informed the Archaeological and Heritage Assessment is up-to-date and robust; and
 - The information on the EIA Study Area's archaeological potential will be limited by the effectiveness of the geophysical survey and the extent of trial trenching. Although these methods should give a robust understanding of the presence of buried archaeology at the EIA Study Area.
- 5.224 The following limitations and assumptions have been identified with regards to climate change:
- Operating at a pre-planning phase we have no control or view upon the likely future developers of the Proposed Development and in particular their construction methodologies and therefore must assume they are familiar with the requirements and implications of dealing with whole life carbon and the design and specification requirements this imposes.
 - The level of detail available in respect of emissions pertaining to the Cumulative Projects is relatively limited. However, we have taken a professionally informed view of their likely emissions based on the scale and type of development to appraise the potential impacts in the context of Wiltshire emissions as a whole, and in so doing have concluded as per the narrative above.
 - The assessment has looked at baseline figures and informed calculations for WLC and operational emissions respectively, focusing primarily on the aspects of emissions which the Applicant, or subsequent developers, would have reasonable control and influence. Those aspects over which they have less control - such as a resident's choice of personal vehicle, their travel choices generally (either for commuting or holidays, etc) are not assessed at this stage.

- Similarly, if the Grid does not decarbonise at the expected rate, then the emissions relating to any imported Grid electricity will also deviate from those provided. We must assume though given the 2050 target is a legally binding one, that they will be met. These factors are outside of the control of the Applicant and the developers building the homes.

6. Landscape and Visual

Technical Baseline

- 6.1 A desk-based assessment has identified that there are no potentially sensitive national landscape designations within 3km of the EIA Study Area as shown on the Relevant Planning Designations and Considerations Plan (**Figure 6.1**). The EIA Study Area does not lie within a locally designated landscape, however, the northern part of the EIA Study Area abuts a Special Landscape Area (SLA) named 'SLA 5: The higher land of Spye and Bowood Parklands', as designated under the adopted Wiltshire Local Plan (*West Wiltshire District Plan 2004 - Saved Policy C3: Special Landscape Areas*).
- 6.2 At a national level, the EIA Study Area falls wholly within the central part of National Character Area (NCA) 117: 'Avon Vales', an undulating, low-lying landscape of mixed, predominantly pastoral agriculture and small limestone-built towns, cut by the (Bristol) River Avon and its tributaries, and surrounded to the west, south and east by higher land.
- 6.3 There are no published Special Qualities to describe the SLA and Policy C3: Special Landscape Areas states that the NCA provides guidance as to the characteristic attributes of the SLA. The key characteristics of the local county and district level published landscape character assessments is also considered to provide guidance to the key characteristics.
- 6.4 At a local level the EIA Study Area is covered by both the *Wiltshire Landscape Character Assessment* (LUC 2005)¹¹⁵ and the *West Wiltshire District Landscape Character Assessment* (CBA 2007)¹¹⁶. Further updates to these areas are provided with the *Local Landscape Character Report* (2020) within the *Joint Melksham Neighbourhood Plan 1* (JMNP1) *Evidence Base*.¹¹⁷
- 6.5 Within the *Wiltshire Landscape Character Assessment* (2005) the EIA Study Area is located within the host Landscape Type (LT) 12: Open Clay Vale and Landscape Character Area (LCA) 12B: Avon Open Clay Vale as shown on **Figure 6.2**. Within the *West Wiltshire Landscape Character Assessment* (2007) the EIA Study Area is located within LTC: Open Clay Vale and LCA C1: Melksham Clay Vale (**Figure 6.3**). The JMNP1 Local Landscape Character Report places the EIA Study Area within Landscape Character Type 3: Open Clay Vale.
- 6.6 Overall, the EIA Study Area characteristics are fairly consistent with the published host LCA descriptions as illustrated on **4**. At a site level the key landscape characteristics can be summarised as follows:

¹¹⁵ Land Use Consultants (December 2005) *Wiltshire Landscape Character Assessment*.
<https://www.wiltshire.gov.uk/planning-landscape-conservation> [Accessed: 13.08.25].

¹¹⁶ Chris Blandford Associates (December 2006) *West Wiltshire Landscape Character Assessment*.
<https://www.wiltshire.gov.uk/planning-landscape-conservation> [Accessed: 13.08.25].

¹¹⁷ JMNP1 (February 2020) *Local Landscape Character Report*
<https://www.melkshamneighbourhoodplan.org/evidence-base> [Accessed: 15.08.25].

- The EIA Study Area comprises nine mixed agricultural field parcels and a deciduous woodland plantation located within a gently rolling clay vale landscape, which subtly slopes within the EIA Study Area from higher points along the northern and north-eastern boundaries. The field parcels are geometric in shape and delineated by hedgerows and established hedgerow trees, many of which are oak. A watercourse runs from the south-western boundary through the southern part of the EIA Study Area on the south-eastern boundary. Several interconnected ditches run along field boundaries and connect to the watercourse;
- The landscape setting to the south and west is on similar rolling clay vale landform ranging between 40m AOD to 55m AOD. Clacker's Brook winds across the landscape c.300m to the south at the closest point and riparian vegetation along the brook contributes to visual containment and filtering from the south. Within the SLA to the north-east the landscape rises in a series of upstanding hills allowing for occasional publicly accessible framed views over the EIA Study Area and its context;
- The landscape fabric of the EIA Study Area and surrounding field parcels demonstrate only limited field amalgamation when compared to late 19th century mapping, resulting in a relatively intact landscape structure with a degree of time depth. The historic aspects of the EIA Study Area and its context are also represented by the comprehensive Public Right of Way (PRoW) network, which is evident on historic mapping. Two of these routes are named green lanes: 'Prater's Lane' running along the eastern boundary and 'Brown's Lane' running adjacent to the southern boundary;
- To the north of the EIA Study Area a number of features impinge on the visual and sensory character of the EIA Study Area including noise from the A3102, a line of 132kV pylons and overhead power lines which cross the EIA Study Area, some audible noise from the solar farm to the immediate east, the abrupt urban edge of new housing associated with Lopes Close and views of the settlement edge of Melksham to the west. To the south the EIA Study Area and its context become more rural in character with distance from these influences, however, views towards large agricultural buildings at Sarton Farm and recreational land uses at Melksham Town Football Club are evident in some locations; and
- Overall, the EIA Study Area and its context has a rural character although the edge of settlement and associated land uses are evident. Long distance views are available from within the EIA Study Area towards the ridges to the north-east and south.

6.7 In terms of visual amenity, the 3km study area sets out the extent of receptors, however, occasional reference may be made to features beyond this area where appropriate. The baseline reporting for the Landscape and Visual Impact Assessment (LVIA), which was informed by a computer-generated Zone of Theoretical Visibility (ZTV) with development modelled to an assumed height of 12.9m, has identified the following key receptors:

- Users of the PRoW network within 1km of the EIA Study Area, including the following: Bridleway reference MELW40/Prater's Lane (along the eastern boundary) and MELW41/Brown's Lane (along part of the southern boundary),

Footpaths reference MELW26 (partially within the EIA Study Area), MELW27 (to the east of the EIA Study Area), a group to the south including: Footpaths Reference MELW22, MELW23, MELW24, MELW29; MELW30 and Bridleway Reference MELW25 and a group to the north-east including: Footpath Reference MELW47, MELW59 and MELW60;

- Users of the PRoW network between 1km-3km including on elevated ridges/downland to the north-east and south including the following: Bridleway reference MELW25A to the east; Footpath Reference MELW20, SEEN20 and 20A to the south; Footpath Reference MELW67 to the north-west and Footpath BROM57 within the SLA and Spye Park Registered Park and Garden (RPG), Footpath reference MELW88 within the SLA (to the north-east) and Bridleway/Footpath SEEN6 to the north of the village of Seend to the south;
- National Cycle Network (NCN) route 403 along Woodrow Road;
- Road users on the A3102 and Eastern Way;
- Residents at property numbers 254, 256, 295, 294, 293, 290a, 290, 269a, 289, 288 Sandridge Common, residents at Blackmore Farm and Blackmore House, property numbers 1-12 Lopes Close, Manor Farm, Little Snarlton Farm and Snarlton Farm and Tanhouse Farm;
- Melksham Town Football Club; and
- Commercial units at Snarlton Farm.

6.8 An EIA Study Area visit was undertaken in June 2025 by a qualified Landscape Architect and photography taken from selected viewpoints to represent the visual receptors identified above. The location of 15 proposed representative views is shown on **Figure 6.5**, and the views are presented at the **Photoviewpoints**. Summer photography from the proposed viewpoints has been undertaken at present. It is noted that this naturally provides additional screening of views and limits the degree to which long range views (in particular) are available. A return site visit will be made during the winter to ensure the ‘worst case’ scenario has been fully considered as part of the assessment process.

6.9 The proposed viewpoints are listed in **Table 16.1**. To aid the landscape and visual assessment, ‘wireline’ photomontages will be provided to indicate the scale and massing of built form from selected viewpoints.

Table 6.1: Proposed Viewpoints

Viewpoint No.	Location	Distance from EIA Study Area
1	View south-east from A3102/Sandridge Common	0m
2	View north-west from PRoW Bridleway ref. MELW40/‘Prater’s Lane’	10m

Viewpoint No.	Location	Distance from EIA Study Area
3	View west from PRoW Bridleway ref. MELW40/'Prater's Lane'	10m
4	View north-west from PRoW Bridleway ref. MELW40/'Prater's Lane'	10m
5	View south-west from A3102/Sandridge Common (within SLA)	670m
6	View north-west from PRoW Bridleway ref. MELW25A	1.03km
7	View north-west from PRoW Footpath ref. MELW30/'Prater's Lane'	620m
8	View north-east from PRoW Bridleway ref. MELW41/'Brown's Lane'	15m
9	View north-east from PRoW Footpath ref. MELW22	420m
10	View north-west from PRoW Footpath ref. MELW26 (within EIA Study Area)	Within EIA Study Area
11	View south-east PRoW Footpath ref. MELW26	250m
12	View east from Eastern Way (close to PRoW MELK105/MELW41)	410m
13	View south-east from Woodrow Road/National Cycle Network Route 403	1.29km
14	View south-west from PRoW Footpath ref. BROM57 (within Spye Park RPG and the SLA)	3.20km
15	View north-west from PRoW Bridleway ref. SEEN6	2.52km

Proposed Scope of Assessment

- 6.10 The below sets out the proposed scope of assessment based on an understanding of the characteristics of the EIA Study Area, surrounding area and the Proposed Development. Where environmental effects are considered unlikely to be 'significant', an appropriate evidence base has been provided to justify the 'scoping out' of these effects ensuring the EIA and ES only assess those effects considered 'likely' to be significant.

Effects Unlikely/Not Significant

- 6.11 The following effects are considered unlikely to be significant and therefore will not be considered further within the EIA or reported in the ES. A factual evidence base has been provided below to support this. Where mitigation has been used to inform this judgement, the identified mitigation has been captured within the PEMP provided in **Appendix 2.1.**

Effects on Landscape Character Areas Beyond the Visual Envelope

- 6.12 Effects on Landscape Character Areas may be direct i.e. physical changes to that character area, or indirect, i.e. changes brought about by experiencing the Proposed Development when in an adjacent or further Character Area. If the Proposed Development cannot be experienced from that Character Area, then there will be no indirect effects.
- 6.13 Therefore, changes to the key characteristics of Landscape Character Areas beyond the visual envelope are not considered to be significant and will not be considered further in the EIA or reported in the ES.

Effects on the National Character Area

- 6.14 The EIA Study Area is situated within NCA 117: Avon Vales. Due to the comparative scale of the Proposed Development to the geographically extensive NCA, effects on the NCA are unlikely to be higher than negligible.
- 6.15 Therefore, changes to the key characteristics of NCA 117 are not considered to be significant and will not be considered further in the EIA or reported in the ES.

Effects on Visual Receptors

- 6.16 Views into the EIA Study Area considered likely to result in significant effects are limited to those within the Zone of Theoretical Visibility (ZTV) as shown on **Plan EDP 5**.

Effects on Melksham Football Club

- 6.17 Due to a combination of distance, intervening vegetation and primary mitigation measures embedded in the design, (retained boundary features and the set back of development), it is considered that any views of the Proposed Development from Melksham Football Club will be glimpsed at most.
- 6.18 Therefore, changes to the visual amenity of the receptors at this location are not considered to be significant and will not be considered further in the EIA or reported in the ES.

Effects Likely/Significant

- 6.19 **Table 16.2** outlines the effects (and associated receptor[s]) that are considered to be likely and significant and therefore will be assessed within the EIA and reported in the ES.

Table 6.2: Potential Likely Significant Effects and Sensitive Receptors

Effect	Receptor(s)	Applicable Stage(s)
Changes to Landscape Fabric of the EIA Study Area itself	EIA Study Area Landscape Character	Construction/ Operation
Changes to Landscape Character	Host Landscape Character units including these (overlapping) areas: Host LT 12: Open Clay Vale (as defined by LUC);	Construction/ Operation

Effect	Receptor(s)	Applicable Stage(s)
	• Host LCA 12B: Avon Open Clay Vale (as defined by LUC); • Host LT C: Open Clay Vale (as defined by CBA); • Host LCA C1: Melksham Open Clay Vale (as defined by CBA); and • Host Area 3: Open Clay Vale (as defined by JMNP1).	
Changes to Key Characteristics of the Special Landscape Area	Special Landscape Area as defined by: • Non-host LT 7: Wooded Greensand Hills; • Non-host LCA 7C: Bowood Greensand Hills; • Non-host LT F: Greensand Hills; • Non-host LCA F2: Sandridge Park Greensand Hills; and • Non-host Area 4: Wooded Greensand Hills (as defined by JMNP1).	Construction/ Operation
Changes to the landscape character and visual amenity of visitors to Spye Park RPG	Visitors to the RPG.	Construction/ Operation
Changes to visual amenity of visual receptors within 1km of the EIA Study Area	Users of the following routes: • PRow Bridleway reference MELW40/ Prater's Lane (along the eastern boundary of the EIA Study Area); • Bridleway reference MELW41/ Brown's Lane (along the southern boundary of the EIA Study Area); • Footpath reference MELW26 (within the EIA Study Area); • Footpath reference MELW27 (to the west of the EIA Study Area); • Group of footpaths to the south within the ZTV including MELW22 and MELW30; • Group of footpaths to the north-west including MELW60; • Road users on the A3102 (including within SLA); • Road users on Eastern Way; • Residents at 254, 256, 295, 294, 293, 290a, 290, 269a, 289, 288 Sandridge Common; • Residents at Manor Farm, Snarlton Farm and Little Snarlton Farm and Tanhouse Farm;	Construction/ Operation

Effect	Receptor(s)	Applicable Stage(s)
	- Residents at Blackmore Farm and Blackmore House; and - Residents at property numbers 1-12 Lopes Close. - Users of/visitors to the Commercial Units at Snarlton Farm	
Changes to visual amenity of visual receptors between 1km-3km of the EIA Study Area	Users of the following routes: - Woodrow Road/NCN 403; - Bridleway Reference MELW25A to the east; - Group of footpaths to the south including Footpath reference MELW20 and SEEN 20A; - Footpaths to north-west including MELW67; - Users of the PRoW network on elevated ridges within SLA to north-east including Footpath reference MELW88 (within the Spyre Park RPG and SLA) and BROM57; and - Users of the PRoW network on elevated ridges to the south including Bridleway/Footpaths on ridge to the south including SEEN6.	Construction/ Operation

Effects Likely Significant In-Combination with Cumulative Projects

- 6.20 All of the receptors scoped in above will be assessed for further effects that are considered to be likely and significant due to in-combination effects with Cumulative Projects and therefore will be assessed within the EIA and reported in the ES.

Assessment Methodology of Effects Likely/Significant

- 6.21 The assessment of the impact of the Proposed Development on the landscape will evaluate the environmental consequences of the Proposed Development in terms of its effects on the character and quality of the landscape and visual amenity.
- 6.22 The following background surveys/studies have been/will be completed.

Table 6.3: Background Surveys/Studies

Survey/Study/Analysis/ Evaluation	Overview	Date of Completion
Completed		
Field Assessment	To understand how the baseline condition of the EIA Study Area compares with the published LCAs.	May and June 2025
Photoviewpoint Photography	Summer photography to capture representative viewpoints.	May 2025

Survey/Study/Analysis/ Evaluation	Overview	Date of Completion
Data Trawl	Data trawl of relevant environmental and planning designations.	May 2025
Landscape and Visual Baseline (Appendix to ES Chapter)	Baseline report on the existing landscape and visual context of the EIA Study Area and identification of mitigation measures.	July 2025
Pending		
Landscape and Visual Impact Assessment	Landscape and Visual Assessment of Effects (LVIA).	September/ October 2025

- 6.23 The landscape and visual methodology has been drawn from best practice guidelines comprising the GLVIA3¹¹⁸. The aim of these guidelines is to set high standards for the scope and content of landscape and visual impact assessments and to establish certain principles that will help to achieve consistency, credibility, transparency and effectiveness throughout the assessment.
- 6.24 The assessment of landscape and visual effects includes a combination of objective and subjective (professional) judgements, and it is therefore important that a structured and consistent approach is adopted to ensure that the assessment undertaken is as objective as possible.
- 6.25 The assessment of effects to landscape character will systematically describe and analyse the features within the landscape, such as landform; vegetation cover; settlement pattern and morphology; transport patterns; land use; materiality; and scale/form of built elements, which together create a particular sense of place.
- 6.26 The assessment of effects to visual amenity will consider visual receptors, which are the viewers of and within the landscape. Representative viewpoints have been selected, which will be consulted on with the Local Planning Authority and informed by professional judgement.
- 6.27 The assessment will consider the baseline of the landscape and visual resource (as existing in 2025), the temporary construction stage (with all temporary effects considered to be medium-term) (no specific year is identified as this considers the effects during the construction stage as a whole) and the permanent operational stage effects at Year 1 and Year 15 (considered to be permanent effects). The use of Year 1 and Year 15 for the operational stage assessment will be to ensure that the worst-case pre-maturation of landscape mitigation and enhancement effects (i.e. at Year 1) and residual effects, taking account of the maturing landscaping within the Proposed Development (i.e. at Year 15), are identified.

¹¹⁸ Landscape Institute /IEMA (2013) Guidelines for Landscape and Visual Impact Assessment – Third Edition. <https://www.landscapeinstitute.org/publication/tgn-02-21-assessing-landscape-value-outside-national-designations/>

- 6.28 The assessment of landscape value is based on a combination of the landscape-related designations and consideration of factors as set out in GLVIA3 and the 2021 Landscape Institute Technical Guidance Note (TGN) 02-21¹¹⁹. The methodology for the assessment of sensitivity/value and magnitude of change for the LVIA is provided in **Appendix 6.1**.

Determining Sensitivity of Receptor

- 6.29 Each receptor's sensitivity, based on value and susceptibility to change, will be identified.
- 6.30 Landscape value is the inherent value of the landscape resource irrespective of the type of development proposed and, as such, is determined within the baseline.
- 6.31 The assessment of landscape value is based on a combination of the landscape-related designations and consideration of factors as set out in GLVIA3 and the 2021 Landscape Institute Technical Guidance Note (TGN) 02-21¹²⁰. TGN 02-21 provides nine criteria for decisions about landscape value including: natural heritage, cultural heritage and associations, landscape condition and distinctiveness, recreational value, and perception relating to scenic appeal and tranquillity. The overall value for each landscape receptor will be categorised as **Very High, High, Medium, Low or Very Low**.
- 6.32 The assessment of visual value is based upon the importance of the location of the view, its designations, cultural associations and the amount to which the view forms part of the experience in the location. The overall value for each visual receptor will be categorised as **Very High, High, Medium, Low or Very Low** and will be informed by professional judgement supported by reasoned argument.
- 6.33 Landscape susceptibility will be categorised as **Very High, High, Medium, Low or Very Low**, accounting for the following criteria: landform, pattern/complexity, composition, land-cover and relationship to existing settlements or developments. However, not all criteria are equally applicable or important within a given landscape/type of development proposed and professional judgement will be applied.
- 6.34 Visual susceptibility to the type of change proposed is based upon the activity or expectation of the viewer. It will be categorised as **Very High, High, Medium, Low or Very Low**. Where people are in their homes or engaged in outdoor recreation focussed on the landscape, visual receptors may have a high susceptibility, whilst it may be low for those engaged in work or travelling on major roads. Professional judgement will be applied.
- 6.35 The sensitivity of a receptor is a combination of the value and the susceptibility of the receptor to the type of change proposed, indicating the capacity for the receptor to accommodate a development, and will be categorised as **Very High, High, Medium, Low or Very Low** and informed by professional judgement.

¹¹⁹ Landscape Institute (February 2021) Technical Guidance Note 02/21 Assessing Landscape Value Outside National Designations

¹²⁰ Landscape Institute (February 2021) Technical Guidance Note 02/21 Assessing Landscape Value Outside National Designations

Determining the Magnitude of Change

6.36 The landscape magnitude of change will be informed by judgements about the precise nature of the change brought about by the Proposed Development both in terms of the existing landscape character, in relation to its visual and perceptual dimension and landscape elements/features, and the addition of new landscape elements/features, and its duration and reversibility and is categorised as **Very High, High, Medium, Low** or **Very Low**.

6.37 In the evaluation of the effects on views and the visual amenity of the identified receptors, the magnitude of visual change is typically described with reference to:

- The scale of change in the view, with respect to the loss or addition of features in the view and changes in its composition, and the geographical extent of the change in the view. Factors contributing to this include:
 - The angle of view in relation to the main activity of the receptor;
 - The distance of the viewer from the Proposed Development;
 - The proportion of the view affected; and
 - The extent of the area over which the changes would be visible.
- Whether or not the view is experienced in fixed or transient views and, in the latter, whether it is intermittent/glimpsed or continuous; and
- The duration of the change, whether temporary or permanent.

Determining the Level of Effect

6.38 The assessment of likely significant effects to sensitive receptors will consider the sensitivity of the receptor and the magnitude of change (as outlined in **Appendix 6.1**) to determine the level of effect on a scale of Major¹²¹, Major/Moderate, Moderate, Moderate/Minor, Minor, Minor Negligible, and Negligible. Significant effects will be determined following this through professional judgment referring to the EDP Methodology in **Appendix 6.1** for definitions of effects.

Limitations and Assumptions

6.39 To ensure transparency within the EIA process, the following limitations and assumptions have been identified:

- The methodology used for the LVIA assessment is specific to the assessment of landscape and visual matters and terminology may differ slightly to that which is seen as significant in other disciplines. A thorough and robust LVIA methodology and assessment would be used (based on GLVIA3, best practice, and professional judgement) to identify potential significant effects. This would then be used as a

¹²¹ In order to ensure consistency in reporting significance of effects throughout the ES, effects of substantial or very substantial will be reported as major. Where this occurs, further detail will be set out within the LVIA, appended to the ES.

basis for the description of Significant effects which would be described within the ES Chapter in the interest of proportionality and brevity;

- The landscape and visual effects will be determined based upon details of building heights and landscape mitigation. The baseline assessment has been based on information readily available at the time of undertaking the assessment;
- During EIA Study Area visits to the EIA Study Area and surrounding area, weather conditions, the time of day and seasonal factors have influenced the visual assessment and photographic record of the environment;
- Access to private properties has not been obtained and the visual assessment will be conducted in line with best practice set out within GLVIA3;
- The construction stage of the Proposed Development will be assessed with mitigation accounting for primary mitigation to be incorporated into the design of the Proposed Development; and
- The growth rate of structural planting proposals will be assumed as 1m in height every three years.

7. Biodiversity

Technical Baseline

Designated sites

- 7.1 No designated sites of nature conservation importance are located within or adjacent to the EIA Study Area. A single European-designated site lies within 10km, which is Bath and Bradford on Avon Bats Special Area of Conservation (SAC), located 9.4km to the northwest. This SAC is primarily designated for the presence of greater horseshoe bat and Bechstein's bat. One nationally-designated site of nature conservation importance lies within 5km, which is Spyre Park Site of Special Scientific Interest (SSSI), located 2.1km to the northeast. This SSSI is designated for its breeding-bird and lichen assemblages, lowland mixed deciduous woodland and wet woodland.
- 7.2 A further ten non-statutory sites are located within 2km of the EIA Study Area. The closest of these is Eighteen Acre Plantation Local Wildlife Site (LWS), located 0.8km to the east. This is designated for woodland habitats. The EIA Study Area is hydrologically connected (via Clackers Brook) to Bristol Avon River LWS, which is located approximately 2.4km downstream of the EIA Study Area.

Habitats

- 7.3 The EIA Study Area comprises a series of poor semi-improved grassland and arable fields bordered by a network of hedgerows and ditches. There is a block of semi-natural broadleaved woodland in the southeast corner of the EIA Study Area and there are veteran trees present within the hedgerows. A watercourse, a tributary of Clackers Brook, flows from east to west through the southern part of the EIA Study Area.
- 7.4 Streams are Priority Habitats and Wiltshire BAP Habitats. The woodland meets the criteria for Lowland mixed deciduous woodland Priority Habitat and is also a Wiltshire BAP Habitat. All of the hedgerows qualify as 'important' under the Hedgerow Regulations 1997 (as amended). Hedgerows are a Priority Habitat and ancient/species-rich hedgerows are a Wiltshire BAP Habitat.

Species

- 7.5 The following protected and notable species have been confirmed as present within the EIA Study Area:
- Reptiles – grass snake recorded within the EIA Study Area and slow worm recorded immediately west of EIA Study Area;
 - Breeding birds – including confirmed breeding dunnock and stock dove; probable breeding woodpigeon and wren; and possible breeding song thrush and spotted flycatcher. The EIA Study Area is used by barn owl but no nest sites have been identified;
 - Hazel dormouse – recorded in hedgerows within the EIA Study Area;
 - Bats – two Natterer's bat tree roosts confirmed within EIA Study Area and foraging/commuting activity recorded for at least ten bat species (primarily

common pipistrelle but also including low levels of lesser horseshoe bat and barbastelle activity); and

- Badger – two outlier setts recorded within the EIA Study Area.

7.6 Habitats within the EIA Study Area also have the potential to support a range of other protected and notable species, including:

- Plants – limited potential for notable plants within the woodland, hedgerow, ditch and watercourse habitats.
- Invertebrates – limited potential for notable invertebrates within the woodland, hedgerow, ditch and watercourse habitats.
- Common toad – this Priority Species is assumed to be present.
- Otter – no evidence of this legally-protected Priority Species was recorded during surveys, but there are records of this species throughout the local area, so occasional use of the watercourse is assumed.
- Other mammals – brown hare (Priority Species) has been recorded within the EIA Study Area, and the presence of hedgehog, harvest mouse (both Priority Species) and water shrew (legally protected (limited)) is assumed.

7.7 The following protected species are considered likely to be absent from the EIA Study Area:

- White-clawed crayfish – watercourse not considered to be suitable for this legally-protected Priority Species.
- Great crested newt – the seven waterbodies identified within 250m of the EIA Study Area boundary were all either assessed as being unsuitable for this legally-protected Priority Species or returned negative eDNA results.
- Water vole – no evidence of this legally-protected Priority Species recorded during surveys.

Proposed Scope of Assessment

7.8 This section sets out the proposed scope of assessment based on an understanding of the characteristics of the EIA Study Area, surrounding area and the Proposed Development (**Chapter 4**). Where environmental effects are considered unlikely to be 'significant', an appropriate evidence base has been provided to justify the 'scoping out' of these effects ensuring the EIA and ES only assess those effects considered 'likely' to be significant.

Effects Unlikely/Not Significant

7.9 The following effects are considered unlikely to be significant and therefore will not be considered further within the EIA or reported in the ES. A factual evidence base has been provided below to support this. Where mitigation has been used to inform this

judgement, the identified mitigation has been captured within the PEMP provided in **Appendix 2.1**.

All effects to Bath and Bradford on Avon Bats SAC

- 7.10 There would be no risk or probability of a likely significant effect (i.e. Negligible effect) on the integrity of the Bath and Bradford-on-Avon Bats SAC. The EIA Study Area is not located within an associated 'Bat Consultation Zone' for the SAC¹²². 'Bat Consultation Zones' comprise 'core roosts' and 'core areas' for the bat species associated with the SAC. The EIA Study Area is also located outside of 'risk zones' identified within the Trowbridge Bat Mitigation Strategy SPD¹²³. This mitigation strategy was developed to identify the impacts arising from development in the Trowbridge area on bats associated with the Bath and Bradford-on-Avon Bats SAC.
- 7.11 Therefore, all effects to Bath and Bradford on Avon Bats SAC are not considered to be significant and will not be considered further in the EIA or reported in the ES.

All effects to Spye Park SSSI

- 7.12 No mechanisms or pathways have been identified likely to affect Spye Park SSSI during the construction or operational phases of the Proposed Development. The SSSI is too distant from the EIA Study Area for any direct loss or pollution of habitats or the lichen assemblage to occur. It is also too distant for the Proposed Development to result in any harm or disturbance of the woodland bird assemblage. There is a lack of public access to the SSSI¹²⁴, and therefore recreational impacts would not occur.
- 7.13 Therefore, all effects to Spye Park SSSI are not considered to be significant and will not be considered further in the EIA or reported in the ES.

Construction effects to LWSs (excluding Bristol Avon River LWS)

- 7.14 With the exception of Bristol Avon River LWS, where a hydrological connection exists, no mechanisms or pathways have been identified likely to affect any LWSs during construction of the Proposed Development. This is due to the distance of the LWSs from the EIA Study Area.
- 7.15 Therefore, all construction effects to LWSs (excluding Bristol Avon River LWS) are not considered to be significant and will not be considered further in the EIA or reported in the ES.

Habitat degradation / change from waterborne and airborne pollution and hydrological changes

- 7.16 Dust and contamination of the water generated by construction activities have the potential to affect the Bristol Avon River LWS, habitats (ancient/veteran trees, woodland, hedgerows, watercourses, plants) and species which they support

¹²² Wiltshire Council (2015). *Bats Special Area of conservation (SAC) – Planning guidance for Wiltshire*. Wiltshire Council.

¹²³ Johns Associates Limited (2019). *Trowbridge Bat Mitigation Strategy SPD. Prepared in support of the Wiltshire Housing Sites Allocation Plan*. Report prepared on behalf of Wiltshire Council.

¹²⁴ Wiltshire Council (2021). *ENQ/2021/03559 – Land at Blackmore Farm, 287, Sandridge Common, Melksham*. Wiltshire Council.

(invertebrates, common toad, reptiles, breeding birds, hazel dormouse, bats, otter, badger, other mammals).

- 7.17 However, as detailed in **Chapter 5** and **Chapter 10**, a CEMP will be prepared to outline how the construction of the Proposed Development will avoid, minimise or mitigate effects on the environment during the construction phase, such as screening stockpiles of materials, deployment of windbreak netting and dampening exposed soils as appropriate and set out requirements for ongoing monitoring and liaison with the local community and Wiltshire Council. The CEMP will also ensure the appointed contractor will produce and implement a construction phase surface water drainage strategy which will ensure water is suitably managed so that the ditches and underlying water table are not subjected to additional or contaminated surface water flows.
- 7.18 Therefore, effects from habitat degradation / change due to waterborne and airborne pollution and hydrological changes from construction activities are not considered to be significant and will not be considered further in the EIA or reported in the ES.

Effects Likely/Significant

- 7.19 **Table 7.1** outlines the effects (and associated receptor[s]) that are considered to be likely and significant and therefore will be assessed within the EIA and reported in the ES. Species considered to be absent from the EIA Study Area will not be included in the assessment of effects; the evidence to justify this approach will be provided in the ES.

Table 7.1: Potential Likely Significant Effects and Sensitive Receptors

Effect	Receptor(s)	Applicable Stage(s)
Direct habitat loss, damage and fragmentation	Ancient/veteran trees, woodland, hedgerows, watercourses, other habitats, plants, invertebrates, common toad, reptiles, breeding birds, hazel dormouse, bats, otter, badger, other mammals.	Construction
Habitat creation and enhancement	Ancient/veteran trees, woodland, hedgerows, watercourses, other habitats, plants, invertebrates, common toad, reptiles, breeding birds, hazel dormouse, bats, otter, badger, other mammals.	Construction
Killing/injury associated with site clearance	Plants, invertebrates, common toad, reptiles, breeding birds, hazel dormouse, bats, otter, badger, other mammals.	Construction
Disturbance associated with noise, lighting and other visual stimuli	Common toad, reptiles, breeding birds, hazel dormouse, bats, otter, badger, other mammals.	Construction / Operation
Recreation effects	LWSs within 2km of the EIA Study Area, ancient/veteran trees, woodland, hedgerows, watercourses, other habitats, plants, invertebrates, common toad,	Operation

Effect	Receptor(s)	Applicable Stage(s)
	reptiles, breeding birds, hazel dormouse, bats, otter, badger, other mammals.	
Killing/injury associated with vehicle collisions and cat predation	Common toad, reptiles, breeding birds, hazel dormouse, bats, otter, badger, other mammals.	Operation

Effects Likely Significant In-Combination with Cumulative Projects

- 7.20 No further likely significant effects are anticipated in-combination beyond those identified in **Table 7.1** for the Proposed Development alone.

Assessment Methodology of Effects Likely/Significant

- 7.21 The following background surveys/studies have been/will be completed. In each case the survey area was the EIA Study Area, except where stated otherwise.

Table 7.2: Background Surveys/Studies

Survey/Study/Analysis/ Evaluation	Overview	Date of Completion
Completed		
Desk study	Biodiversity records obtained from Wiltshire & Swindon Biodiversity Records Centre for 2km radius around the EIA Study Area (extended to 4km for bats). International and national designated sites obtained from MAGIC website for 10km and 5km search radii respectively.	April 2021 & November 2023 (2025 update pending)
Extended Phase 1 Habitat survey	Identification of main habitat types and suitability for protected/notable species in accordance with IEA ¹²⁵ and JNCC ¹²⁶ guidelines.	May 2021, July 2023 & May 2024
Hedgerow survey	Assessment of hedgerows against ecological 'importance' criteria in accordance with Defra guidelines ¹²⁷ .	May 2021 & May 2025

¹²⁵ Institute of Environmental Assessment (1995). *Guidelines for Baseline Ecological Assessment*. E and F Spon, London.

¹²⁶ Joint Nature Conservation Committee (2010). *Handbook for Phase-1 Habitat Survey: a technique for environmental audit*. JNCC, Peterborough.

¹²⁷ Department for Environment, Food and Rural Affairs (2007). *Hedgerow Survey Handbook - A standard procedure for local surveys in the UK*. Defra, London.

Survey/Study/Analysis/ Evaluation	Overview	Date of Completion
Great crested newt survey	Habitat Suitability Index (HSI) survey ¹²⁸ and eDNA survey ¹²⁹ of ponds within 250m of EIA Study Area.	April 2021 & May 2024
Reptile survey	Artificial refuge survey of suitable habitats following standard methodology ¹³⁰ .	April-May 2021 & April-May 2025
Breeding bird survey	Undertaken according to a modified Common Bird Census methodology ¹³¹ .	April-June 2021 & April-June 2025
Barn owl survey	Undertaken in accordance with standard methodology ¹³² .	April & August 2021 & July 2024
Badger survey	Undertaken in accordance with standard methodology ¹³³ .	May 2021, June 2024 & June 2025
Bat roost survey	Preliminary assessment of all trees in accordance with BCT guidelines ^{134,135} . Climb/emergence surveys of impacted trees in accordance with BCT guidelines.	April-September 2021 & May 2024 July-September 2023 & April-July 2025
Bat activity survey	Transect and static detector surveys in accordance with BCT guidelines.	April-October 2021 & May-October 2024
Hazel dormouse survey	Nest tube survey in accordance with standard methodology ¹³⁶ .	April-October 2021

¹²⁸ Oldham RS, Keeble J, Swan MJS and Jeffcote M (2000). Evaluating the suitability of habitat for the Great Crested Newt (*Triturus cristatus*). *Herpetological Journal* 10, 143-155.

¹²⁹ Biggs J, Ewald N, Valentini A, Gaboriaud C, Griffiths RA, Foster J, Wilkinson J, Arnett A, Williams P and Dunn F (2014). *Analytical and methodological development for improved surveillance of the Great Crested Newt. Appendix 5. Technical Advice note for field and laboratory sampling of great crested newt (Triturus cristatus) environmental DNA*. Freshwater Habitats Trust, Oxford.

¹³⁰ Froglife (1999). *Reptile survey: an introduction to planning, conducting and interpreting surveys for snake and lizard conservation*. Froglife Advice Sheet 10. Froglife, Halesworth.

¹³¹ Gilbert G, Gibbons DW, Evans J (1998) *Bird Monitoring Methods*. RSPB, Sandy, Bedfordshire.

¹³² Shawyer CR (2011). *Barn Owl Tyto alba Survey Methodology and Techniques for use in Ecological Assessment: Developing Best Practice in Survey and Reporting*. IEEM, Winchester.

¹³³ Harris S, Cresswell P and Jefferies D (1989). *Surveying Badgers*. The Mammal Society, Bristol.

¹³⁴ Collins, J (ed.) (2016). *Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd Edition)*. The Bat Conservation Trust, London.

¹³⁵ Collins, J (ed.) (2023). *Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th Edition)*. The Bat Conservation Trust, London.

¹³⁶ Bright P, Morris P, and Mitchell-Jones T (2006). *The Dormouse Conservation Handbook: 2nd edition*. English Nature, Peterborough

Survey/Study/Analysis/ Evaluation	Overview	Date of Completion
Otter and water vole survey	Undertaken in accordance with standard methodologies for otter ¹³⁷ and water vole ¹³⁸ .	April & August 2021 & May, July & August 2024

- 7.22 The importance/sensitivity of the ecological receptors¹³⁹ identified through desk study and site survey, will be evaluated using criteria for habitats and species based on CIEEM guidelines¹⁴⁰. However, the eight-level geographic scale used in the CIEEM guidelines will be transposed into a four-level importance (sensitivity) scale for consistency with the wider EIA; refer to **Table 7.2** below.

Table 7.3: Comparison of the CIEEM approach to assessing the importance of a receptor with the approach that will be taken for this EIA

CIEEM guidelines	This EcIA
International	High
UK	High
National (England, Northern Ireland, Scotland, Wales)	High to medium
Regional	Medium
County / Metropolitan area	Medium
District / unitary authority / city / borough	Medium
Local or Parish	Low
Sub-parish	Negligible

- 7.23 The assessment of likely significant effects to sensitive receptors will consider the sensitivity of the receptor (on a scale of high, medium, low and negligible) and the magnitude of change (on a scale of large, medium, small and negligible) to determine the level of effect on a scale of major, moderate, minor and negligible. Significant effects will be determined following this through professional judgment.

¹³⁷ Chanin P (2003). *Monitoring the Otter* Lutra lutra. Conserving Natura 2000 Rivers Monitoring Series No.10. English Nature, Peterborough.

¹³⁸ Strachan R, Moorhouse T and Gelling T (2011). *Water Vole Conservation Handbook*: 3rd Edition. WildCRU, Oxford.

¹³⁹ Although referred to as 'features' in the CIEEM guidelines (2018), they will be referred to as 'receptors' in the ES, for consistency with the wider assessment.

¹⁴⁰ CIEEM (2018) *Guidelines for Ecological Impact Assessment in the UK and Ireland – Terrestrial, Freshwater, Coastal and Marine*. Chartered Institute of Ecology and Environmental Management, Winchester.

Limitations and Assumptions

- 7.24 There are no significant limitations to the assessment. Minor limitations to baseline surveys will be identified in the relevant Technical Appendices of the ES.

8. Noise and Vibration

Technical Baseline

- 8.1 A noise survey was carried out at the EIA Study Area from 24 to 28 July 2025¹⁴¹ to assess noise levels in the area. The full methodology and results of the noise survey are provided in Appendix 8.1
- 8.2 Average, maximum and background noise levels across the EIA Study Area were generally dictated by road traffic on the A3102 and other surrounding roads.
- 8.3 Noise was also identified from aircraft movements; however, noise from aircraft was insignificant when compared with noise from road traffic.
- 8.4 No significant noise was observed from the businesses at Manor Farm or Snarlton Farm during the survey period and they are not considered further in this report. Based on our site observations and a review of satellite imagery there are no significant noise generating activities that take place at either premises.

Proposed Scope of Assessment

- 8.5 The below sets out the proposed scope of assessment based on an understanding of the characteristics of the EIA Study Area, surrounding area and the Proposed Development (**Chapter 4**). Where environmental effects are considered unlikely to be 'significant', an appropriate evidence base has been provided to justify the 'scoping out' of these effects ensuring the EIA and ES only assess those effects considered 'likely' to be significant.

Effects Unlikely/Not Significant

- 8.6 The following effects are considered unlikely to be significant and therefore will not be considered further within the EIA or reported in the ES. A factual evidence base has been provided below to support this. Where mitigation has been used to inform this judgement, the identified mitigation has been captured within the Preliminary Environmental Management Plan (PEMP) provided in **Appendix 2.1**.

Assessment of noise and vibration from surrounding sources affecting the proposed development

- 8.7 Noise sources across the EIA Study Area include road traffic, aircraft and Manor Farm or Snarlton Farm. However, the Noise Impact Assessment (**Appendix 8.1**) shows that primary mitigation measures (i.e. standard thermal double glazing and standard 'hit' and miss trickle ventilators) will be adequate to secure planning compliant internal noise levels in habitable rooms of the Proposed Development.
- 8.8 A qualitative assessment of ground-borne vibration levels was carried out at the EIA Study Area and no perceptible vibration levels were identified. Consequently, vibration levels are considered to be acceptable for the Proposed Development.

¹⁴¹ Cass Allen report reference RP01-25232-R0 dated 31 July 2025

- 8.9 The Noise Impact Assessment also shows acceptable external noise levels can be achieved in amenity spaces (i.e. private gardens) based on the measured baseline noise environment.
- 8.10 Based on the above, noise and vibration from surrounding sources affecting the Proposed Development is not considered to be significant and will not be considered further in the EIA or reported in the ES.

Assessment of operational noise and vibration generated by the proposed development affecting existing dwellings

- 8.11 Any fixed mechanical plant noise impact from the Proposed Development (i.e. from proposed air source heat pumps etc) will be controlled to planning compliant levels and can be secured via planning condition if deemed necessary by the LPA.
- 8.12 Noise generated by traffic from the Proposed Development on the existing highway is not significant in isolation. A review of the traffic data provided by the project transport indicates traffic flow increases of 0-16% on all assessed road links. Typically, traffic increases of less than 25% on road links will not be assessed with respect to noise unless those particular road links are already subject to high levels of traffic, which is not the case in this instance.
- 8.13 Based on the above, noise and vibration generated from the Proposed Development (plant and road traffic) on existing residential dwellings (as detailed in **Table 8.1**) is not considered to be significant and will not be considered further in the EIA or reported in the ES.

Effects Likely/Significant

- 8.14 Table 8.1 outlines the effects (and associated receptor[s]) that are considered to be likely and significant and therefore will be assessed within the EIA and reported in the ES.

Table 8.1: Potential Likely Significant Effects and Sensitive Receptors

Effect	Receptor(s)	Applicable Stage(s)
Noise & vibration from construction works	Existing dwellings along A3102	Construction

Effects Likely Significant In-Combination with Cumulative Projects

- 8.15 Further effects (and associated receptor[s]) that are considered to be likely and significant due to in-combination effects with Cumulative Projects and therefore will be assessed within the EIA and reported in the ES include:

Assessment of changes in road traffic noise cumulatively generated by the proposed development affecting nearby noise sensitive uses

- 8.16 Combined development generated flows from the Proposed Development and Cumulative Project 1 could cause a significant adverse impact at existing sensitive receptors. Cass Allen have reviewed traffic data provided by the project transport consultant for the worst-case transport scenario (2028 + committed development + Phase 1 + Phase 2) and traffic on the A3102 is expected to increase by approx. 23%-75% along the A3102.

- 8.17 Therefore, the cumulative noise impact of development traffic generated from the Proposed Development in-combination with Cumulative Project 1 is considered to be likely and potentially significant and therefore will be assessed cumulatively within the EIA and reported in the ES.

Assessment Methodology of Effects Likely/Significant

- 8.18 The following background studies have been completed.

Table 8.2: Background Surveys/Studies

Survey/Study/ Analysis/ Evaluation	Overview	Date of Completion
Completed		
Noise Impact Assessment	Standalone noise impact assessment of proposed development completed by Cass Allen (Appendix 8.1). Includes baseline noise survey and assessment in accordance with ProPG guidance and relevant national and local policy	July 2025

- 8.19 The assessment of potential significant effects will be undertaken using the following noise and vibration specific methodology, legislation, policy and guidance:

- Control of Pollution Act¹⁴²;
- Environmental Protection Act¹⁴³;
- Guidelines for Environmental Noise Impact Assessment¹⁴⁴;
- British Standard 5228 Parts 1¹⁴⁵ and 2¹⁴⁶ (Noise & Vibration); and
- Design Manual for Roads and Bridges¹⁴⁷.

- 8.20 The scope and methodology for the assessment of noise and vibration for the EIA process and assessment of cumulative impacts will be confirmed with an Environmental Health Officer at Wiltshire Council.

Assessment of Construction Noise and Vibration

- 8.21 It is typical for Local Planning Authorities to impose restrictions during the construction phase of developments (i.e. limits on noise emissions, hours of working, permissible equipment types etc.) via planning condition(s). A qualitative assessment of construction

¹⁴² Great Britain, 1974. *Control of Pollution Act 1974* (c. 40). Available at: <https://www.legislation.gov.uk/ukpga/1974/40>

¹⁴³ Great Britain, 1990. *Environmental Protection Act 1990* (c. 43). Available at: <https://www.legislation.gov.uk/ukpga/1990/43>

¹⁴⁴ Institute of Environmental Management and Assessment, 2014. *Guidelines for Environmental Noise Impact Assessment*

¹⁴⁵ British Standards Institution, 2009. *BS 5228-1:2009+A1:2014: Code of practice for noise and vibration control on construction and open sites – Part 1: Noise*.

¹⁴⁶ British Standards Institution, 2009. *BS 5228-2:2009+A1:2014: Code of practice for noise and vibration control on construction and open sites – Part 2: Vibration*

¹⁴⁷ Highways England, 2020. *Design Manual for Roads and Bridges: LA 111 – Noise and Vibration (Revision 2)*. Available at: <https://www.standardsforhighways.co.uk/dmrb/search/cc8cfc7-c235-4052-8d32-d5398796b364>

noise and vibration in accordance with BS5228 will be included in the ES as this is considered appropriate at outline design stage.

- 8.22 Based on guidance given in BS5228, as amended (BSI, 2014), and considering the temporary nature of the works, limits for construction noise and vibration limits that may be appropriate for surrounding sensitive receptors in this case are summarised in **Table 8.3**.

Table 8.3: Magnitude of Change Criteria for Construction noise and vibration

Level of effect	Average noise level, dB LAeq, 10hr(weekday) 5h(Saturday)	Particle velocity vibration level, mms ⁻¹	Vibration Dose Value, ms ^{-1.75}
Negligible	<65	<0.3	<0.2
Small	65 to 70	0.30 to 1	0.2 to 0.4
Medium	70.1 to 75	1.01 to 10	0.4 to 0.8
Large	>75	>10	>0.8

Assessment of Changes in Road Traffic Noise

- 8.23 It is important to ensure that changes in traffic flows on roads due to new large-scale developments do not result in unacceptable increases in noise levels at existing nearby noise-sensitive properties.
- 8.24 Traffic data will be analysed to assess the change in road traffic noise levels at the EIA Study Area and within the wider Study Area due to additional road traffic associated with the Proposed Development as well as other permitted and proposed developments within the vicinity.
- 8.25 A change in road traffic noise of 1 dBA in the short term (e.g. within a few years of a scheme opening) is the smallest change in noise levels that is considered perceptible. In the longer term, a 3 dBA change is considered the minimum perceptible. The effects of changes in noise levels should therefore be considered separately for the short and long term.
- 8.26 Classifications for the magnitude of effects that can be expected from short and long term changes in road traffic noise are given as shown in **Table 8.4**. These are based on guidance given in the DMRB (Highways Agency, 2011) document. Mitigation measures will be required for receptors where moderate adverse or major adverse impacts are predicted; mitigation measures are not considered necessary for negligible and minor adverse impacts (i.e. not significant in accordance with the significance criteria adopted for noise impact).

Table 8.4: DMRB classification of magnitude of noise effects in the short and long term

Noise Change, dB LA10,18h	Magnitude of Effect
Short Term	
Less than 1	Negligible
1 to 2.9	Small
3 to 4.9	Medium
5+	Large
Long Term	
Less than 3	Negligible
3 to 4.9	Small
5 to 9.9	Medium
Greater than or equal to 10	Large

8.27 The approach that will be adopted in this instance is to consider the short and long-term noise effects of the Proposed Development for the ‘worst case’ transport scenario.

Limitations and Assumptions

8.28 To ensure transparency within the EIA process, the following limitations and assumptions have been identified:

- Information on construction programme, phasing, duration, and specific plant/vehicles is not available at this stage. The assessment approach for noise and vibration associated with the construction phase will therefore be refined once details are confirmed;
- Detailed traffic flows for construction and operation (from the Transport Assessment) are not yet finalised. Scoping therefore assumes that the ES will assess only cumulative operational phase impacts on key road links;
- The scoping relies on current UK noise and vibration policy and guidance. Should new guidance be published before the ES is submitted, the methodology may need to be updated; and
- The extents of the study area for receptors and road links are not yet confirmed. A screening exercise will need to be completed to define these.

9. Transport and Access

Technical Baseline

- 9.1 The EIA Study Area is located to the east of Melksham and to the south of the A3102 Sandridge Common, from which is it proposed to gain vehicular and pedestrian access to the site. Pedestrian and cycle connectivity will also be achieved on the western boundary from the Phase 1 site.
- 9.2 The Proposed Development is well served by the local network of Public Rights of Way (PROW), shown on **Figure 9.1**, and include:
- **Bridleway MELW40** – follows the eastern boundary of the EIA Study Area and connects Sandridge Common Road to the farmland located to the southeast.
 - **Footpath MELW26** – runs to the west of the EIA Study Area (and partially through the south of the EIA Study Area) and connects Sandridge Common Road to Bridleway MELW41.
 - **Bridleway MELW41** – connects Eastern Way to the countryside south of the site.
 - **Footpath MELW27** – connects Footpath MELW26 with Footpath MELW104 located west of Eastern Way.
- 9.3 The closest bus stops to the Proposed Development are located on Skylark Road to the west of The EIA Study Area. The stops provide access to bus service 15 which provides a circular town service serving Melksham which provides circa five services per day.
- 9.4 Melksham railway station is situated circa 3.6km to the west of the Proposed Development and is accessible by bus service 15 from Skylark Road. The station is also located within a reasonable cycling distance of the Proposed Development and can be accessed via a combination of dedicated cycle routes and quiet on-road recommended routes¹⁴⁸. The railway station provides a direct service to Bristol Temple Meads, Bath Spa, Westbury, Salisbury, Romsey and Southampton for journeys further afield.
- 9.5 There is a good network of pedestrian and cycle facilities in the existing residential area adjacent to the EIA Study Area. There is a continuous footway along the southern side of the A3012 Sandridge Common. To the west, Sandridge Common provides one of the main walking routes for pedestrians heading towards Melksham Town Centre which is located around 2.5km from the EIA Study Area. Uncontrolled pedestrian crossing facilities with dropped kerbs, tactile paving and pedestrian refuge islands are provided at the roundabout with Eastern Way. A continuous footway along the southern side of the A3102 towards the town centre provides access to a range of local facilities on route such as convenience stores, educational facilities and the library.
- 9.6 Eastern Way can be reached from Sandridge Common. On Eastern Way there is a shared footway / cycleway and further walking/cycling connections towards the town centre

¹⁴⁸ Source: Connecting Wiltshire – Melksham Cycle Map

facilities via Snarlton Lane and Blackmore Road. To the south, Eastern Way provides a connection to the Melksham Oak Community School via a new dedicated surfaced walking/cycling connection and along Spa Road and Pathfinder Way to Bower Hill Industrial Estate, an area of significant employment.

- 9.7 Traffic surveys undertaken in April 2022 and updated by further surveys in June 2025 confirm Sandridge Common (to the north of the EIA study area) has two-way flows of circa 820 vehicles in the morning peak hour and 770 vehicles in the evening peak hour.

Proposed Scope of Assessment

- 9.8 This section sets out the proposed scope of assessment based on an understanding of the characteristics of the EIA Study Area, surrounding area and the Proposed Development (**Chapter 4**). Where environmental effects are considered unlikely to be 'significant', an appropriate evidence base has been provided to justify the 'scoping out' of these effects ensuring the EIA and ES only assess those effects considered 'likely' to be significant.

Effects Unlikely/Not Significant

- 9.9 The following effects are considered unlikely to be significant and therefore will not be considered further within the EIA or reported in the ES. A factual evidence base has been provided below to support this. Where mitigation has been used to inform this judgement, the identified mitigation has been captured within the PEMP provided in **Appendix 2.1**.
- 9.10 The full extent of the study area and the scope of assessment for EIA purposes is defined by two rules, in line with the IEMA Guidelines¹⁴⁹:
- Rule 1 - Highway links where traffic flows will increase by more than 30% (or the number of heavy goods vehicles will increase by more than 30%); and
 - Rule 2 - Highway links of high sensitivity where traffic flows have increased by 10% or more.
- 9.11 Access is planned from Sandridge Common to the north of the Site. Potential traffic links for traffic increase, potential delay, safety, and severance are listed below i.e. Rule 1 will apply include:
- | | |
|--|-----------------------|
| • A3102 Sandridge Common West of Eastern Way roundabout; | • A350 Beanacre Road; |
| • Lowbourne Road; | • Spa Road; |
| • A3102 Bradford Road; | • Bath Road; and |
| | • Western Way. |

¹⁴⁹ IEMA (2023) Environmental Assessment of Traffic and Movement – July 2023”

9.12 Highway links where Rule 1 applies and which are also considered to be sensitive i.e. where Rule 2 will apply include:

- A3102 Sandridge Common East of proposed access;
- A3102 Sandridge Common West of proposed access;
- Eastern Way; and
- Bank Street.

9.13 The IEMA guidance suggests that the greatest environmental change will generally be when the project traffic is at the largest proportion of the total flow. Therefore the environmental assessment should be undertaken at the year of opening of the project or the first full year of its operation. Assessment will be undertaken for an opening year of 2028 and as a worst case scenario assumes the Proposed Development will be fully operational.

9.14 **Table 9.1** provides 2028 Without Development Opening Year traffic flows (AADT).¹⁵⁰

Table 9.1: 2028 Without Development Opening Year (AADT)

Road Link	24-Hr 2-way AADT	24-Hr 2-way AADT - HGV	% HGV
A3102 Sandridge Common Rd (East of Proposed Access)	8423	354	4.20%
A3102 Sandridge Common Rd (West of Proposed Access)	8806	369	4.19%
A3102 Sandridge Common Road (West of Blackmore Rd)	7883	132	1.68%
Lowbourne Road	10277	119	1.15%
Bank Street	15136	230	1.52%
A3102 Bradford Road	14836	358	2.41%
A350 Beanacre Road	38713	2291	5.92%
Eastern Way (South of Skylark Road)	8545	362	4.24%
Spa Road	11393	544	4.78%
Bath Road	14068	389	2.77%
Western Way	23705	877	3.70%

¹⁵⁰ AADT Without development include traffic flows for : 14/10461/OUT; 16/01123/OUT; and PL/2023/07097. The inclusion of committed developments was based on information available at the time of assessment. The inclusion and assessment of committed developments will be revised for the ES.

- Development traffic flows are given in **Table 9.2** for the Proposed Development; and The Proposed Development and Cumulative Project 1 in combination.

Table 9.2: Development Traffic Flows – Proposed Development and Cumulative Project 1 (AADT)

Road Link	Proposed Development		Cumulative Project 1	
	24-Hr 2-way AADT	% HGV	24-Hr 2-way AADT	% HGV
A3102 Sandridge Common Rd (East of Proposed Access)	272	0%	530	0%
A3102 Sandridge Common Rd (West of Proposed Access)	1267	0%	3582	0%
A3102 Sandridge Common Road (West of Blackmore Rd)	711	0%	2121	0%
Lowbourne Road	711	0%	2121	0%
Bank Street	317	0%	704	0%
A3102 Bradford Road	317	0%	704	0%
A350 Beanacre Road	140	0%	319	0%
Eastern Way (South of Skylark Road)	345	0%	1235	0%
Spa Road	345	0%	724	0%
Bath Road	15	0%	39	0%
Western Way	131	0%	376	0%

9.15 2028 With Proposed Development traffic flows are given in **Table 9.3**:

Table 9.3: 2028 Future Year Traffic Flows With Proposed Development (AADT)

Road Link	24-Hr 2-way AADT	% change - AADT	24-Hr 2-way AADT - HGV	% change – AADT HGV
A3102 Sandridge Common Rd (East of Proposed Access)	8695	3.23%	354	0%
A3102 Sandridge Common Rd (West of Proposed Access)	10073	14.39%	369	0%
A3102 Sandridge Common Road (West of Blackmore Rd)	8595	9.02%	132	0%
Lowbourne Road	10989	6.92%	119	0%

Road Link	24-Hr 2-way AADT	% change - AADT	24-Hr 2- way AADT - HGV	% change – AADT HGV
Bank Street	15453	2.10%	230	0%
A3102 Bradford Road	15153	2.14%	358	0%
A350 Beanacre Road	38853	0.36%	2291	0%
Eastern Way (South of Skylark Road)	8890	4.04%	362	0%
Spa Road	11738	3.03%	544	0%
Bath Road	14084	0.11%	389	0%
Western Way	23835	0.55%	877	0%

9.16 2028 With Proposed Development and Cumulative Project 1 traffic flows are given in **Table 9.4.**

Table 9.4: 2028 Future Year Traffic Flows With Proposed Development and Cumulative Project 1 (AADT)

Road Link	24-Hr 2-way AADT	% change - AADT	24-Hr 2- way AADT - HGV	% change – AADT HGV
A3102 Sandridge Common Rd (East of Proposed Access)	9225	9.52%	354	3.83%
A3102 Sandridge Common Rd (West of Proposed Access)	13655	55.06%	369	2.70%
A3102 Sandridge Common Road (West of Blackmore Rd)	10716	35.93%	132	1.23%
Lowbourne Road	13110	27.56%	119	0.90%
Bank Street	16157	6.74%	230	1.42%
A3102 Bradford Road	15856	6.88%	358	2.26%
A350 Beanacre Road	39172	1.19%	2291	5.85%
Eastern Way (South of Skylark Road)	10125	18.49%	362	3.57%
Spa Road	12462	9.38%	544	4.37%
Bath Road	14122	0.38%	389	2.76%
Western Way	24212	2.14%	877	3.62%

Transport Impacts arising during the operational stage – Proposed Development

- 9.17 Rule 1 - With the Proposed Development no highway links are identified where traffic flows will increase by more than 30% (or the number of heavy goods vehicles will increase by more than 30%).
- 9.18 Rule 2 – With the Proposed Development there are no Highway links of high sensitivity where traffic flows have increased by 10% or more.
- 9.19 Bridleway MELK 40 runs parallel to and outside of the EIA Study Area. No increase in traffic movements nor diversions are expected during the operational phase.
- 9.20 Therefore, transport impacts to existing highway receptors as a result of the Proposed Development at operational stage are not considered to be significant and will not be considered further in the EIA or reported in the ES.

Transport Impacts arising during the construction stage – Proposed Development

- 9.21 The mechanisms through which the Proposed Development could lead to potential adverse transport effects during the construction phase, include:
- Works associated with new site access to Sandridge Common.
 - Potential temporary changes to site access arrangements, including the closure or diversion of PRowS and footways which could longer journey times for drivers and pedestrians and amenity effects.
 - Increases in traffic, specifically Heavy Goods Vehicle (HGV) movements, Light Goods Vehicles (LGVs) and from workers during the construction phase; and
 - Increased risk of road traffic collisions and hazardous load incidents due to the presence of large construction vehicles.
- 9.22 Bridleway MELK 40 runs parallel to and outside of the EIA Study Area. MELK26 runs through the south-west part of the EIA Study Area. No diversions to either route are expected during the construction phase and therefore there will be no changes to journey times for pedestrians using the PRow network (**Figure 9.1**).
- 9.23 The above activities will be mitigated (tertiary mitigation) through a Construction Environment Management Plan (CEMP) and a Construction Traffic Management Plan (CTMP) which will be prepared and secured via a suitably worded planning condition. These documents will include measures and information to encourage appropriate management of the environment and construction traffic. Such measures include:
- The use of approved routes for construction vehicles including approved routing plans;
 - The management of working hours and delivery times to minimise disturbance caused by traffic (e.g. avoiding deliveries during school peak hours);
 - To maintain driver/pedestrian amenity:
 - Covering loads coming and to leaving the Site;

- Provision of wheel washing / vehicle cleaning facilities within the Site; and
- Inspection of local highway network and cleaning as necessary.

9.24 Therefore, following mitigation transport impacts to the existing highway links listed above on drivers, pedestrians, cyclists, equestrians and communities as result of construction activities, are not considered to be significant and will not be considered further in the EIA or reported in the ES.

Effects of Hazardous Loads during construction and operation

9.25 The construction or operation of the Proposed Development is not expected to give rise to hazardous loads. If any such loads were required, they would be subject to relevant legislative provisions such as those for transporting dangerous goods via road under The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009 (as amended)¹⁵¹. The movement of large (abnormal) loads is regulated by National Highways and will be subject to separate agreement with the relevant highway authorities and police through the Electronic Service Delivery for Abnormal Loads ('ESDAL').

9.26 Hazardous / large loads are not considered to be significant and will not be considered further in the EIA or reported in the ES.

Effects on Public Transport during construction and operation

9.27 The nearest bus stops are located on Skylark Road, near Eastern Way. The impact on Eastern Way during the operational phase falls below the rule 1 and rule 2 thresholds and therefore no significant impact is expected to existing public transport services.

9.28 Public transport impact is not considered to be significant and will not be considered further in the EIA or reported in the ES.

Effects Likely/Significant

9.29 The analysis above confirms that the effects of the Proposed Development on transport and highway receptors are not expected to be significant and will not be assessed within the EIA and reported in the ES.

Effects Likely Significant In-Combination with Cumulative Projects

9.30 Further effects (and associated receptor[s]) that are considered to be likely and significant due to in-combination effects with Cumulative Projects and therefore will be assessed within the EIA and reported in the ES include:

Transport Impacts arising during the operational stage – Proposed Development and Cumulative Project 1

9.31 Rule 1 - With the Proposed Development and the Cumulative Project 1 in-combination the following highway links are identified where traffic flows will increase by more than 30% (or the number of heavy goods vehicles will increase by more than 30%).

¹⁵¹ The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009, UK Statutory Instruments 2009 No. 1348

- A3102 Sandridge Common West of proposed access; and
 - A3102 Sandridge Common West of Blackmore Road.
- 9.32 Rule 2 - With the Proposed Development and the Cumulative Project 1 in-combination the following highway links of high sensitivity are identified where traffic flows have increased by 10% or more:
- Eastern Way (South of Skylark Road).
- 9.33 Therefore, the effect of transport impacts of the Proposed Development and Cumulative Project 1 during the operational stage to A3102 Sandridge Common West of Proposed Access and A3102 Sandridge Common West of Blackmore Road is considered to be likely and potentially significant and therefore will be assessed cumulatively within the EIA and reported in the ES.
- 9.34 A review of other committed developments will be undertaken and included where considered necessary within the ES.

Assessment Methodology of Effects Likely/Significant

- 9.35 The following background surveys/studies have been/will be completed.

Table 9.5: Background Surveys/Studies

Survey/Study/Analysis/ Evaluation	Overview	Date of Completion
Completed		
Traffic Surveys	Original Traffic surveys across the study network completed in 2022 and updated with further surveys in 2025	June 2025
Pending		
Transport Scoping Note	Transport note to set out proposed scope of Transport Assessment for agreement with WC Highways Development Management Team	October 2025

- 9.36 The IEMA Guidelines sets out a number of potential environmental effects relating to transport and highways considerations which may require assessment. These will be used as the basis for the method of assessment of the environmental effects of traffic. In addition, and where appropriate, reference will be made to the Design Manual for Roads and Bridges¹⁵² (DMRB).
- 9.37 The assessment is divided into two distinct phases (construction and operation) in accordance with best practice as set out in the IEMA guidelines. The assessments

¹⁵² Department of Transport DMRB Volume 13 Environmental Assessment

separately consider construction traffic and Development traffic. In practice there will be an overlap of these two elements as Development will be phased over a number of years. Given the different characteristics of the traffic generated during each of these phases it is considered appropriate to separate them to enable the impacts to be robustly assessed and quantified. Where appropriate the cumulative effect of both phases will be assessed concurrently as construction activities will continue whilst the development is operational.

9.38 The IEMA guidance identifies a number of environmental impacts that could arise from changes in vehicular travel demand. The following assessment criteria which will be referred to and assessed to are:

- Community severance;
- Driver and passenger delay;
- Non-motorised user delay;
- Non-motorised user amenity;
- Fear and intimidation on and by road users; and
- Road user and pedestrian safety.

9.39 The study area is determined by this Scoping exercise. The following routes have been identified as meeting the criteria for further assessment for the Proposed Development and Cumulative Project 1 only:

- A3102 Sandridge Common West of proposed access;
- A3102 Sandridge Common West of Blackmore Road; and
- Eastern Way (South of Skylark Road).

9.40 The assessment within the ES will be informed by the Transport Assessment and Framework Travel Plan documents being submitted in support of the planning application. The Baseline data has been established through traffic surveys and information available for the consented Cumulative Project 1. Proposed Development traffic forecasts will be agreed with Wiltshire Council officers through the Transport Assessment Scoping process.

9.41 The assessment of likely significant effects to sensitive receptors will consider the sensitivity of the receptor (on a scale of high, medium, low and negligible) and the magnitude of change (on a scale of large, medium, small and negligible) to determine the level of effect on a scale of major, moderate, minor and negligible. Significant effects will be determined following this through professional judgment.

Limitations and Assumptions

9.42 To ensure transparency within the EIA process, the following limitations and assumptions have been identified:

- The basis of the traffic assessment used in this analysis is from surveys undertaken in April 2022 and updated in June 2025. The data will be set out in the Transport Assessment.
- To provide a worst-case assessment, a 2028 Year of Opening has been assumed which allows for committed development and assumes that the Proposed Development is completed and fully operational.
- The Site, on completion, operates 'normally', and does not assess any one-off events that may have impacts on multi-modal transport flows.

10. Air Quality

Technical Baseline

- 10.1 The EIA Study Area is not located in, or near, an existing Air Quality Management Area (AQMA), indicating that air quality across and in the vicinity of the EIA Study Area is generally acceptable. Pollutant concentrations in the area, and therefore at relevant receptors, are largely influenced by vehicle emissions along the A3102 Sandridge Common, plus wider background sources. Monitoring of air quality by Wiltshire Council (WC) is undertaken across the locality, including at various locations around the EIA Study Area, as indicated in **Figure 1.1**.
- 10.2 Monitored annual mean NO₂ concentrations at the nearest diffusion tubes to the EIA Study Area (35 and 36) were well below (i.e., <75% of) the 40µg/m³ National Air Quality Objective (AQO) between 2020 and 2023, at 22.2-29.0µg/m³ at 35 and 15.3-19.8µg/m³ at 36¹⁵³. Equally, annual mean concentrations of PM₁₀ were well below the 40µg/m³ AQO at the closest automatic monitor (AM3) during 2019-2023, indicating that air quality in the vicinity is generally good.
- 10.3 No local monitoring of PM_{2.5} is undertaken in the locality, however Defra-predicted annual mean background concentrations¹⁵⁴ at the EIA Study Area for the current year (2025) are well below the 20µg/m³ AQO, at 6.4-6.6µg/m³. Concentrations of this pollutant are largely influenced by regional sources and thus are fairly consistent across much of the UK. As such, levels at the EIA Study Area are expected to be close to background with minimal contribution from road vehicle emissions.

Proposed Scope of Assessment

- 10.4 This section sets out the proposed scope of assessment based on an understanding of the characteristics of the EIA Study Area, surrounding area and the Proposed Development (**Chapter 4**). Where environmental effects are considered unlikely to be 'significant', an appropriate evidence base has been provided to justify the 'scoping out' of these effects ensuring the EIA and ES only assess those effects considered 'likely' to be significant.

Effects Unlikely/Not Significant

- 10.5 The following effects are considered unlikely to be significant and therefore will not be considered further within the EIA or reported in the ES. A factual evidence base has been provided below to support this. Where mitigation has been used to inform this judgement, the identified mitigation has been captured within the PEMP provided in **Appendix 2.1**.

¹⁵³ Wiltshire Council (June 2024). 2024 Air Quality Annual Status Report (ASR). Available at: https://www.wiltshire.gov.uk/media/13780/Wiltshire-Council-2024-ASR/pdf/Wiltshire_Council_2024_ASR_fte3875nolff.pdf?m=1722945829590 [Accessed: 19/08/2025].

¹⁵⁴ Department for Environment, Food and Rural Affairs (Defra) (2024). Background Mapping data for local authorities – 2021. Available at: <https://uk-air.defra.gov.uk/data/laqm-background-maps?year=2021> [Accessed: 20/08/2025].

Human health and amenity impacts as a result of dust and PM₁₀ from construction activities

- 10.6 Construction activities have the potential to result in dust soiling or PM₁₀ health effects due to dust deposition on property and inhalation of elevated PM₁₀ concentrations. Dust and particulate matter (PM) emissions produced during construction activities will be assessed qualitatively within the Air Quality Assessment for planning and controlled through the implementation of a Construction Environmental Management Plan (CEMP).
- 10.7 This CEMP will be informed by the Institute of Air Quality Management¹⁵⁵ (IAQM) guidance and would include prevention measures, such as screening stockpiles of materials, deployment of windbreak netting and dampening exposed soils as appropriate and set out requirements for ongoing monitoring and liaison with the local community, and Wiltshire Council. These tertiary mitigation measures would be considered an integral part of the Proposed Development and considered as part of the Environmental Management Plan.
- 10.8 Therefore, dust soiling and PM₁₀ health effects as a result of dust from construction activities to existing residential receptors is not considered to be significant and will not be considered further in the EIA or reported in the ES.

Human health impacts as a result of construction phase vehicle emissions

- 10.9 The number of vehicles that would be in operation during the earthworks and construction of the Proposed Development is not expected to exceed the Environmental Protection UK (EPUK) & IAQM guidance¹⁵⁶ screening criteria of >100 Heavy Duty Vehicles (HDVs; >3.5t) as Annual Average Daily Traffic (AADT) outside of an AQMA on roads with relevant exposure. Should this screening criteria be exceeded, the potential for impacts on concentrations of NO₂, PM₁₀ and PM_{2.5} at existing sensitive receptor locations would be modelled explicitly within the Air Quality Assessment for planning, following the approach below. This would be determined once construction traffic volumes are known. However, the conclusions of the air quality assessment for the adjacent Cumulative Project 1 determined that impacts from construction traffic on air quality were not significant. Given that the Proposed Development is smaller in scale than Cumulative Project 1, the construction vehicle trip number the Proposed Development are likely to be less and are therefore unlikely to have a significant effect on air quality.
- 10.10 Therefore, human health impacts as a result of construction phase vehicle emissions to existing residential receptors along roads expected to be used by construction traffic is not considered to be significant and will not be considered further in the EIA or reported in the ES.

¹⁵⁵ Institute of Air Quality Management (IAQM) (2024). Guidance on the Assessment of Dust from Demolition and Construction. Available at: [Construction-Dust-Guidance-Jan-2024.pdf](#) [Accessed: 20/08/2025].

¹⁵⁶ Institute of Air Quality Management (IAQM) and Environmental Protection UK (EPUK) (2017). Land-Use Planning & Development Control: Planning for Air Quality. Available at: <https://www.iaqm.co.uk/text/guidance/air-quality-planning-guidance.pdf> [Accessed: 20/08/2025].

Human health impacts as a result of existing emissions sources

- 10.11 The development has the potential to introduce new receptors to an area with elevated air pollutant concentrations. However, due to the existing baseline air quality conditions outlined above, and the predicted improvement in future baseline conditions as a result of stricter emissions standards and the uptake of cleaner vehicles, pollutant concentrations at the EIA Study Area are not expected to exceed the relevant AQOs during operation of the development. As such, a detailed assessment of exposure is not expected to be required for the Proposed Development.
- 10.12 Therefore, human health impacts as a result of existing emissions sources to future residential receptors within the Proposed Development is not considered to be significant and will not be considered further in the EIA or reported in the ES.

Human health impacts as a result of operational phase vehicle emissions from the Proposed Development

- 10.13 The projects Transport Consultant (i-Transport) has indicated that the Proposed Development is expected to generate 1,539 AADT light duty vehicles (LDVs). This is greater than the relevant IAQM screening criterion of >500 LDVs outside of an AQMA on roads with relevant exposure. As such, a detailed dispersion modelling assessment will be included in the Air Quality Assessment for planning.
- 10.14 However, given that the Phase 1 development site immediately to the west is expected to generate 3,571 AADT, and the Air Quality Assessment undertaken by Entran (2023) for this development resulted in a not significant impact, it can be inferred that the Phase 2 development would also result in a not significant impact, when assessed in isolation.
- 10.15 Therefore, Human health impacts as a result of operational phase vehicle emissions to existing residential receptors along roads expected to be used by development traffic is not considered to be significant and will not be considered further in the EIA. However, there remains potential for significant effects from the Proposed Development, in-combination with other Cumulative Projects which will be reported in the ES (see **Chapter 12** for further details of potential in-combination effects).

Effects Likely/Significant

- 10.16 The analysis above confirms that the effects of the Proposed Development on air quality are not expected to be significant and will not be assessed within the EIA and reported in the ES.

Effects Likely Significant In-Combination with Cumulative Projects

- 10.17 Further effects (and associated receptor[s]) that are considered to be likely and significant due to in-combination effects with Cumulative Projects and therefore will be assessed within the EIA and reported in the ES include:

Human health impacts as a result of operational phase vehicle emissions

- 10.18 Whilst the Proposed Development in isolation is not expected to lead to significant operational phase impacts, there is the possibility that the combined development-generated flows from the consented Cumulative Project 1 and the Proposed Development may cause significant impacts at existing receptors in the vicinity. The Proposed Development is expected to add approximately 43% more trips to the road network assessed for Cumulative Project 1.

- 10.19 Therefore, human health impacts as a result of operational phase vehicle emissions to existing residential receptors along roads expected to be used by development traffic is considered to be likely and potentially significant and therefore will be assessed cumulatively within the EIA and reported in the ES.

Assessment Methodology of Effects Likely/Significant

- 10.20 The following background studies have been completed.

Table 10.1: Background Surveys/Studies

Survey/Study/Analysis / Evaluation	Overview	Date of Completion
Completed		
GIS mapping of Wiltshire Council monitoring locations	WC diffusion tubes and automatic monitors ¹⁵³ have been mapped using Surfer 13 to identify their locations with respect to the EIA Study Area.	20/08/2025
Baseline Assessment of local air quality conditions	Collection of the most recent WC monitoring results ¹⁵³ and comparison of measured pollutant concentrations with the AQOs. Consideration of the representativeness of monitoring locations with respect to the EIA Study Area. Collection of 2025 Defra background data for overview of background air quality conditions in the vicinity.	20/08/2025

- 10.21 The assessment of potential significant effects will be undertaken using the following air quality-specific methodology, legislation, guidance, policy and tools:

- EPUK & IAQM Guidance: Land-Use Planning & Development Control: Planning for Air Quality, 2017¹⁵⁶;
- The Air Quality Standards Regulations, 2010. Statutory Instrument 1001¹⁵⁷;
- Environmental Protection Act, 1990¹⁵⁸;
- Defra Local Air Quality Management Technical Guidance (LAQM.TG22), May 2025¹⁵⁹;

¹⁵⁷ UK Gov. (2010). Air Quality Standards Regulations.

¹⁵⁸ UK Gov. (1990) Environmental Protection Act 1990 - Control of Dust and Particulates Associated with Construction.

¹⁵⁹ Department for Environment, Food and Rural Affairs (Defra) (May 2025) Local Air Quality Management Technical Guidance (LAQM.TG22). Available at: <https://laqm.defra.gov.uk/wp-content/uploads/2025/05/LAQM-TG22-May-25-v2.0.pdf> [Accessed: 20/08/2025].

- Clean Air Strategy 2019¹⁶⁰; and
 - Supplement to the UK plan for tackling roadside nitrogen dioxide concentrations¹⁶¹.
- 10.22 The Scope and Methodology for the assessment of cumulative impacts will be confirmed with Peter Nobes, Senior Public Protection Officer at WC. Traffic data and dispersion will be obtained from i-Transport.
- 10.23 The impacts of cumulative road traffic emissions would be predicted using the ADMS-Roads dispersion model. The model requires a variety of inputs, including road traffic data (flows, speeds and vehicle fleet composition) and meteorological data.
- 10.24 The model would be used to predict pollutant concentrations at worst-case existing receptor locations along roads expected to experience a >500 AADT change for the following three scenarios:
- Baseline year model verification (2024, if available at the time of the assessment, otherwise 2023) using the most appropriate local monitoring data from the Technical Baseline and Background Studies sections;
 - Opening year without the Phase 1 or the Proposed Development, but including traffic generated by other relevant committed developments (3, 4, 5, 6, 7, 8, 9); and
 - Opening year with the Phase 1 and the Proposed Development, including traffic generated by other relevant committed developments (3, 4, 5, 6, 7, 8, 9).
- 10.25 Modelled pollutant concentrations will be combined with Defra-mapped background concentrations¹⁵⁴ to obtain a total predicted environmental concentration at each receptor location. Results would then be compared with the relevant AQOs and the magnitude of impacts at existing receptors evaluated using the approach recommended by the EPUK & IAQM¹⁵⁶. The overall significance of the air quality effects would then be determined following this guidance. Where necessary, mitigation measures would be proposed for the operation of the Proposed Development in order to ensure that residual effects are 'not significant'.
- 10.26 The assessment of likely significant effects to sensitive receptors will consider the sensitivity of the receptor (on a scale of high, medium, low and negligible) and the magnitude of change (on a scale of large, medium, small and negligible) to determine the level of effect on a scale of major, moderate, minor and negligible. Significant effects will be determined following this through professional judgment.

¹⁶⁰ Department for Environment, Food and Rural Affairs (Defra) (2019). Clean Air Strategy 2019.

¹⁶¹ Department for Environment, Food and Rural Affairs (Defra) (October 2018). Supplement to the UK plan for tackling roadside nitrogen dioxide concentrations.

Limitations and Assumptions

10.27 To ensure transparency within the EIA process, the following limitations and assumptions have been identified:

- Local baseline monitoring datasets may not be fully representative of conditions at the EIA Study Area.
- Information on construction programme, phasing, duration, and specific plant/vehicles is not available at this stage. The assessment approach for dust and construction traffic will therefore be refined once details are confirmed.
- Detailed traffic flows for construction and operation (from the Transport Assessment) are not yet finalised. Scoping therefore assumes that the ES will assess only cumulative operational phase impacts on key road links in line with IAQM & EPUK thresholds.
- The scoping relies on current IAQM & EPUK and Defra guidance. Should new guidance be published before the ES is submitted, the methodology may need to be updated.
- The extents of the study area for receptors and road links are not yet confirmed. A screening exercise will need to be completed to define these.

11. Cumulative Effect Assessment Methodology

Overview

- 11.1 The EIA Regulations, Schedule 4, Paragraph 5e and Regulation 4, Paragraph 2, require **the consideration of the cumulation of effects with other “existing and/or approved projects”**, as well as the interaction between effects identified at the project level. Accordingly, the following will be considered within the EIA:

- **Effect interactions:** the interaction of environmental effects resulting from the Proposed Development affecting the same receptor, either within the EIA Study Area or in the local area (sometimes referred to as intra-project effects); and
- **In-combination effects:** the combination of environmental effects resulting from the Proposed Development combined with effects resulting from other existing or approved project (s) affecting the same receptor (sometimes referred to as inter-project effects).

Assessment Methodology

- 11.2 There is no prescribed methodology for the assessment of cumulative effects under EIA Regulations, however guidance has been issued by the Planning Inspectorate¹⁶², for projects that fall under the Nationally Significant Infrastructure Project regime. The methodology set out below therefore is based on: the principles of the Planning Inspectorate guidance; an understanding of the receptors to be assessed through the ES, the nature of the Proposed Development; and professional judgement drawing on previous experience and knowledge at Turley.
- 11.3 The assessment of cumulative effects, for both effect interactions and in-combination effects, will be largely qualitative in nature however for some technical topics, quantitative data may be available (e.g. where modelling work is undertaken), facilitating a quantitative analysis. Where this is possible, it will be fully detailed in the ES; in cases where information is not available, assumptions will be made based on professional judgement and clearly stated alongside any uncertainty as part of the assessment.

Effect Interactions

- 11.4 The assessment of effect interactions will follow a two-stage process, as follows.

Step 1 – Effect interaction identification

- 11.5 The assessment of effect interactions will consider changes from the baseline conditions at common sensitive receptors (i.e. receptors assessed within two or more technical ES chapters), resulting from the Proposed Development. Common sensitive receptors are those identified in Regulation 4, Paragraph 2 (and expanded on in Schedule 4, Paragraph

¹⁶² Planning Inspectorate (2019) Advice Note Seventeen: Cumulative Effects assessment relevant to nationally significant infrastructure projects (Version 2). Available online - <https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/advice-note-17/>

4) of the EIA Regulations. A matrix of residual effect interactions will be provided in the ES for both the construction and operational stages.

- 11.6 The threshold for an effect interaction to be included in the matrices will be based on effects identified in the ES technical chapters of minor residual and above as this will address the potential for a number of residual effects that are not necessarily considered to be 'Significant' in isolation to become 'Significant' when they are considered collectively on a common sensitive receptor. Where, through the application of the matrices, potential effect interactions are not identified, in that no specific common receptor(s) is identified, then it will be concluded that there are no effect interactions. Where potential effect interactions are identified, a qualitative assessment will then be undertaken for the relevant receptor categories through Step 2 below.

Step 2 – Effect interaction appraisal

- 11.7 The appraisal will include the following considerations:
- Magnitude of change (or impact) of each residual effect;
 - Sensitivity (or value, importance, etc.) of the receptor / receiving environment to change;
 - Duration of effects individually and collectively including:
 - short / medium / long-term
 - reversibility;
 - temporary and / or permanent;
 - concurrently or sequentially; and
 - The geographical / spatial extent of the individual effects.
- 11.8 Where possible, a conclusion on effect interactions will be provided discussing the likelihood of the effect interactions being 'Significant' or 'Not Significant'.

In-Combination effects

- 11.9 The assessment of potential in-combination effects will be undertaken using the methodology outlined below.

Step 1: Identification of Projects for Consideration

- 11.10 In order to identify relevant projects (referred to as 'Cumulative Projects') that could give rise to in-combination effects within the Proposed Development, a review of the following sources has been undertaken:
- Wiltshire Council's online register of projects¹⁶³;

¹⁶³ This search has also been informed by using LandStack.

- Planning Inspectorate online register of projects¹⁶⁴;
- Transport and Works Order Act online register of projects¹⁶⁵;
- Parliament Hybrid Bills online register¹⁶⁶.

11.11 In line with the EIA Regulations, this search has focused on projects and therefore is not inclusive of sites allocated within local plans, core strategy documents or supplementary planning documents.

11.12 In line with Planning Inspectorate Advice Note Seventeen, criteria and professional judgment have been used to determine whether to include or exclude projects from further assessment, informed by aspects such as temporal scale, nature of development and other factors. As such, the search has been focused on projects within 5km of the EIA Study Area, acknowledging the maximum extent of likely receptors and nature of effects to be reported within the ES. The following additional criteria has also been used to define the list of Cumulative Projects:

- Applications dating from 2020 onwards. It is anticipated that applications prior to this date will already have been built out (and therefore form part of the baseline) and / or where subsequent applications have been submitted these would be captured within the search dates;
- Applications that have been submitted, consented/granted planning permission, or part implemented;
- Applications that have been refused but are subject to an undetermined appeal;
- Projects of a pertinent scale, which has been determined using professional judgment but informed by their scale¹⁶⁷, perceived impact, or complexity, and are present near the EIA Study Area.

11.13 The Cumulative Projects that will be considered and appraised in the assessment of cumulative effects using the methodology and criteria set out above is provided within **Table 11.1**.

¹⁶⁴ <https://infrastructure.planninginspectorate.gov.uk/projects/register-of-applications/>.

¹⁶⁵ <https://www.gov.uk/government/collections/twa-inspector-reports-and-decision-letters>.

¹⁶⁶ <https://www.parliament.uk/business/bills-and-legislation/current-bills/hybrid-bills/>.

¹⁶⁷ Scale has been based on a judgement, but in part informed by the definition of a major developed within NPPF; the definitions of Schedule 1 and 2 developments within the EIA Regulations; and other developments that do not fall into the above, but could have perceived notable effects.

Table 11.1: Cumulative Projects for Assessment of In-combination Effects

ID	Address	Description	Distance / direction from Site (km)	Status
1	Land at Blackmore Farm, Sandridge Common, Melksham, PL/2023/11188	Demolition of agricultural buildings and development of up to 500 dwellings; up to 5,000 square metres of employment (class E(g)(i) & class E(g)(ii)); land for primary school (class F1); land for mixed-use hub (class E / class F); open space; provision of access infrastructure from Sandridge Common (A3102); and provision of all associated infrastructure necessary to facilitate the development of the site (Outline application relating to access)	Immediately west of the Site	Approved May 2025
2	Snarlton Farm, Snarlton Lane, Melksham PL/2023/09968	Change of use of land from agricultural to commercial. Extension to commercial building (Ref: PL/2023/04036), extension specifically falling under use class B2/B8, associated works and associated parking.	500m west	Approved Sept 2024
3	Land South of Western Way Melksham Wiltshire PL/2022/08504	Outline application (with all matters reserved except for access) for the erection of up to 210 residential dwellings (Class C3) and a 70-bed care home (Class C2) with associated access, landscaping and open space (Resubmission of 20/08400/OUT)	2.4km southwest	Granted at appeal Nov 2023
4	Land at Upside, Melksham, Wilts PL/2022/06221	Demolition of existing buildings and structures, retention of alloy repair centre and development of 112 dwellings, 675 sqm of flexible employment/commercial space (Use class E(g)ii, iii/B2/B8), formation of public open space, foot and cycle links and associated works.	2.8km northwest	Pending Submitted Sept 2022
5	Land west of Semington Road 20/07334/OUT	Outline planning permission for up to 50 dwellings and formation of access and associated works (Outline application to consider access with all other matters reserved).	3km southwest	Granted at Appeal May 2022

ID	Address	Description	Distance / direction from Site (km)	Status
6	Land to the West of Semington Road, Melksham, Wiltshire PL/2022/08155	Outline planning permission for up to 53 dwellings including formation of access and associated works, with all other matters reserved.	3.1km southwest	Granted at Appeal Sept 2024
7	Unit 3 Priory Court, Poulton Land at Semington Road Wilts 20/01938/OUT	Outline planning permission for up to 144 dwellings with informal and formal open space, associated landscaping and vehicular and pedestrian accesses off Semington Road. All matters reserved except for principal means of access.	3km southwest	Approved Sept 2021
8	Land north of the A3102, Melksham PL/2024/10345	The construction of 295 homes; public open space, including formal play space and allotments; sustainable drainage systems; and associated infrastructure; with 0.4ha of land safeguarded for a nursery. Access is to be provided from a new northern arm on the existing Eastern Way/A3102 roundabout junction, with a secondary access onto the A3102. Additional access points are proposed for pedestrians and cyclists.	540m northwest	Pending; Submitted Nov 2024
9	Land North of Bath Road (A365), Melksham PL/2025/06749	Outline planning application (with all matters except access reserved) for mixed use development comprising residential (up to 205 dwellings), land reserved for expansion of secondary school, public open space, landscaping and associated engineering works.	1.2km south west	Pending; Submitted Sep 2025
10	Land to the South of A365 Bath Road and West of Turnpike Garage, Melksham, PL/2024/11426	Construction of warehouse with office space, parking and associated landscaping including site access.	1.4km south west	Pending; Submitted Dec 2024
11	Land at Bowerhill Lane, Bowerhill, Melksham PL/2025/06105	Erection of up to 50 No. dwellings and associated works.	1.4km south west	Pending; Submitted July 2025

ID	Address	Description	Distance / direction from Site (km)	Status
12	Land North of Berryfield Lane, Melksham PL/2025/00626	Outline planning application for up to 68 dwellings and formation of new access and associated works (All matters reserved other than access).	2.9km south west	Pending; Submitted January 2025

Step 2: Assessment of In-combination Effects

- 11.14 The in-combination assessment will focus on the technical assessments scoped into the ES and
- 11.15 The in-combination assessment will take into consideration available documentation submitted in support of the application for the above Cumulative Projects, to identify common receptors present between the Proposed Development and the Cumulative Projects, and the extent of any in-combination effect.
- 11.16 The evaluation at the receptor level will consider:
- Magnitude of change (or impact) in the relevant technical assessments;
 - Sensitivity (or value, importance, etc.) of the receptor / receiving environment to change; and / or
 - Duration and reversibility of effect.
- 11.17 Through a combination of the qualitative evaluation and mitigation presented in the EIA, conclusions will be drawn as to the likelihood for significant in-combination environmental effects and conclusions will be made in terms of:
- How the in-combination effect is different to the project level effect.
 - If there an increase or decrease in the in-combination effects when compared against the project level effect.
 - If the in-combination effect is significant and whether the Proposed Development create the 'tipping point' toward significant.

12. Summary of EIA Scoping Report

12.1 **Chapter 5** identified a number of technical topics for which no likely or significant effects have been identified and are proposed to be 'scoped out' of the EIA and not reported in the ES, based on the technical evidence base provided. These are as follows:

- Water Environment and Flood Risk;
- Cultural Heritage and Archaeology;
- Ground Conditions;
- Socio-Economics and Human Health;
- Climate Change;
- Lighting;
- Waste;
- Major Accidents and/or Disasters; and
- Agricultural Land.

12.2 The technical topics proposed to be 'scoped in' (see **Technical Chapters 6 – 10**) are as follows:

- Landscape and Visual;
- Biodiversity; and
- Noise and Vibration.
- Transport and Access; and
- Air Quality.

12.3 The technical topics Transport and Access and Air Quality have been 'scoped in' in relation to in-combination effects only as significant effects are considered unlikely for the Proposed Development in isolation.

12.4 **Table 12.1** provides a summary of all the technical topics and effects considered unlikely / not significant and therefore 'scoped out' as well as the topics and likely significant environmental effects 'scoped in' that will be considered further within the EIA and reported in the ES.

Table 12.1: Summary of effects which are considered to be Likely and Significant and Not Likely and Significant

Technical Topic Area	Effects which are not considered Likely to be Significant	Effects which are considered Likely and Significant
Water Environment and Flood Risk	Sediment generated during the construction phase	-
	Contamination and reduction in water quality during the construction phase	
	Contamination and reduction in water quality during the operational phase	
	Flood risk and surface water drainage during the construction phase	
	Flood risk during the operational phase	
	Flood risk and surface water drainage during the operational phase	
	Foul drainage during the operational phase	
	Increase in demand on the potable water supply during operation	
Cultural Heritage	Effects on Designated Assets	-
	Effects on Non-designated Heritage Assets	
Ground Conditions and Contamination	Potential Risks from the Presence of Unstable and Compressible Ground	-
	Potential for contamination from infilled ponds and former stockpiles	

Technical Topic Area	Effects which are not considered Likely to be Significant	Effects which are considered Likely and Significant
	Potential for spills or leaks from plant or storage areas during construction and operation	
	Soil contamination risks from potential residual pesticides in the agricultural fields	
Socio-economics and Human Health	Provision of new housing	-
	Access to education facilities (early years, primary and secondary)	
	Access to primary healthcare facilities	
	Access to active travel and sustainable transport options	
	Access to open space and sports & recreation	
	Employment and training opportunities generated during construction	
	Social cohesion, inclusive design and access to community facilities	
	Crime reduction and community safety	
	Access to healthy food	
	Other human health-related effects	
Climate Change	Emissions arising from the construction process	-
	Emissions arising from operations	
Lighting	Disturbance to existing residents due to obtrusive light during construction	-

Technical Topic Area	Effects which are not considered Likely to be Significant	Effects which are considered Likely and Significant
	Disturbance to existing residents due to obtrusive light during operation	
	Increases in sky glow	
Waste	Waste generation during construction	-
	Waste generated during operation	
Major Accidents and/or Disasters	Major accidents associated with COMAH sites	-
	Major accidents associated with underground utility strikes	
	Major accidents associated with overhead powerlines	
	A major accident caused by ground subsidence and associated structural/building collapse	
	Major accidents on the local road network	
	A major accident as a result of fire	
	Major accidents on the local road network	
	Major accidents associated with risk of UXO onsite	
	Major accidents as a result of malicious attacks (e.g. vandalism, arson or terrorism)	
	Major accidents during construction works	
Agricultural Land and Soil Resources	Loss of Agricultural Land	-
	Loss of / damage to Soil Resource	
	Access to open space and sports & recreation facilities	

Technical Topic Area	Effects which are not considered Likely to be Significant	Effects which are considered Likely and Significant
Landscape and Visual	Effects on Landscape Character Areas Beyond the Visual Envelope	Changes to Landscape Fabric of the EIA Study Area itself
	Effects on the National Character Area	Changes to Landscape Character
	Effects on Visual Receptors	Changes to Key Characteristics of the Special Landscape Area
	Effects on Visual Receptors on Woodrow Road (NCN 403)	Changes to the landscape character and visual amenity of visitors to Spy Park RPG
	Effects on Melksham Football Club	Changes to visual amenity of visual receptors within 1km of the EIA Study Area Changes to visual amenity of visual receptors between 2km-3km of the EIA Study Area
Biodiversity	All effects to Bath and Bradford on Avon Bats SAC	Direct habitat loss, damage and fragmentation
	All effects to Spy Park SSSI	Habitat creation and enhancement
	Construction effects to LWSs (excluding Bristol Avon River LWS)	Killing/injury associated with site clearance
	Habitat degradation / change from waterborne and airborne pollution and hydrological changes	Disturbance associated with noise, lighting and other visual stimuli Recreation effects Killing/injury associated with vehicle collisions and cat predation
Noise and Vibration	Assessment of noise and vibration from surrounding sources affecting the proposed development	Noise & vibration from construction works

Technical Topic Area	Effects which are not considered Likely to be Significant	Effects which are considered Likely and Significant
	Assessment of operational noise and vibration generated by the proposed development affecting existing dwellings	Assessment of changes in road traffic noise cumulatively generated by the proposed development affecting nearby noise sensitive uses (<i>in-combination effect only</i>)
Transport and Access	Transport Impacts arising during the operational stage – Proposed Development Transport Impacts arising during the construction stage – Proposed Development Effects of Hazardous Loads during construction and operation Effects on Public Transport during construction and operation	Transport Impacts arising during the operational stage – Proposed Development and Cumulative Project 1 (<i>in-combination effect only</i>)
Air Quality	Human health and amenity impacts as a result of dust and PM₁₀ from construction activities Human health impacts as a result of construction phase vehicle emissions Human health impacts as a result of existing emissions sources Human health impacts as a result of operational phase vehicle emissions from the Proposed Development	Human health impacts as a result of operational phase vehicle emissions (<i>in-combination effect only</i>)

Figures

Appendix 2.1: Preliminary Environmental Management Plan

Project specific measures to avoid and/or prevent significant adverse environmental effects (i.e. mitigation measures) have been considered through the EIA Scoping process, when appraising likely environmental effects.

At this stage, this has focussed on 'primary mitigation' (i.e. inherent mitigation, comprising fundamental aspects of the project design) and 'tertiary mitigation' (i.e. standard environmental commitments/practices).

In order to support Wiltshire Council and other stakeholders, the mitigation measures that have been identified at this stage have been collated into a single preliminary Environmental Management Plan, set out below. This will be developed further as part of the ES.

It is envisaged that mitigation will be secured through suitably worded planning conditions or other mechanism, where appropriate, and the Environmental Management Plan will be utilised by the Applicant and appointed contractor(s) to control mitigation commitments and assurance over their implementation

Schedule of Mitigation

Mitigation Measure	Description / Details of Measure
Primary Mitigation	
Layout / general arrangement	The existing overhead electricity power line will be retained in-situ or diverted with appropriate stand-off distances incorporated within the design of the Proposed Development. The Public Rights of Way (PRoW) MELW26 crosses the southern part of the EIA Study Area which will remain in situ.
Landscape and Public Realm Strategy	Although the design of the Proposed Development has not yet been finalised in detail, the landscape strategy will: • Retention of the majority of hedgerows and interspersed trees; • Retention of the existing woodland in the southeastern part of the EIA Study; • New landscaping along the boundaries of the Proposed Development; • Open space adjacent to Blackmore House Grade II Listed Building; • Public Open Space provision to the north east and south of tributary to Clackers Brook; and • Informal and formal public open spaces, allotments and play spaces, hard and soft landscaping will be incorporated within the Proposed Development.
Building Heights	Maximum building height from finished floor levels are up to 12.5mAOD.
Transport and Access Strategy	Primary access will be provided from Sandridge Common. A network of footpaths/cycleways will connect the EIA Study Area to the wider area including existing PRoW.

Mitigation Measure	Description / Details of Measure
Lighting strategy	There will be new lighting installations at the proposed access, along internal routes as well as within landscaping areas, where required. All permanent lighting installations will be designed and installed in line with relevant standards and guidance ¹⁶⁸ .
Waste strategy	Waste streams generated by the Proposed Development during operation will include recyclables, mixed-waste and green waste. A Waste Management Strategy will set out the principles, strategy and targets for the management and storage of waste and maximise recycling. Appropriate storage and collection facilities will be provided which will be collected and recycled / disposed of in accordance with Wiltshire Council policy.
Energy strategy	The Proposed Development will incorporate EV charging Infrastructure in line with the requirements of Approved Document S¹⁶⁹. The Energy and Sustainability Statement for the Proposed Development will follow the priorities of the Energy Hierarchy: • The dwellings will be ‘zero-carbon ready’, and very low carbon from the outset; • High fabric standards will be specified; • There will be no natural gas connection to the proposed development; and • Energy demand will be met through incorporation of a Future Homes Standard level of energy efficiency, using low carbon air source heat pumps complemented by solar photovoltaic panels. Other measures to reduce energy and water use will be agreed with the Wiltshire Council but are expected to accord with local planning policies.

¹⁶⁸ CIE 150: 2017 – Guide on the Limitation of the Effects of Obtrusive Light from Outdoor Lighting Installations, 2nd Edition; ILP GN01 - Guidance Notes for the Reduction of Obtrusive Light 2021; BS 5489-1 : 2020 – Code of Practice for the Design of Road Lighting; SLL Guide to Limiting Obtrusive Light 2012; SLL Lighting Handbook 2018; CIBSE LG 6 – The Exterior Environment 2016; and ILP Guidance Note 08/18 Bats and Artificial Lighting in the UK; CIE (1997) 126: Guidelines for Minimising Sky Glow.

¹⁶⁹ The Building Regulations 2010, Approved Document S available at: https://assets.publishing.service.gov.uk/media/6218c5d38fa8f54911e22263/AD_S.pdf

Mitigation Measure	Description / Details of Measure
Potable and foul water strategy	Foul and potable water connections will be made to the existing potable water network (operated by Wessex Water) to serve the Proposed Development. Any upgrades will be the responsibility Wessex Water and therefore will not form part of the Proposed Development.
Flood risk and surface drainage strategy	All development will be located within the low-risk Flood Zone 1 area and steered away from areas of surface water flooding. The low and very low risk areas of surface water flood risk and the existing ditch network will be maintained ensuring that the natural flow paths and hydrological regime within the EIA Study Area are maintained. The proposed surface water drainage strategy will include Sustainable Drainage Systems (SuDS) including permeable paving, rainwater planters and detention basins, and will restrict run-off from the EIA Study Area to provide a 30% betterment over existing greenfield QBar rates for all rainfall events up to and including the 1 in 100-year storm, with a 45% additional allowance for the effects of climate change.
Tertiary Mitigation	
Construction Environmental Management Plan (CEMP)	A CEMP will be prepared by the appointed contractor in advance of commencing construction works. The document will provide detailed measures / controls to avoid and manage potential adverse effects upon the environment during the construction stage. Measures will include: <u>General Measures</u> • The proposed construction works will be carried out by a competent contractor that will comply with current legislation¹⁷⁰; • The site security arrangements for the EIA Study Area during the construction stage will be in line with the requirements set out in the Construction (Design and Management) Regulations 2015¹⁷¹ and appropriate levels of security (personnel / CCTV) will be provided.

¹⁷⁰ This includes the Health and Safety at Work etc. Act 1974; the Control of Pollution Act 1974; and Construction (Design and Management) Regulations 2015.

¹⁷¹ Secretary of State (2015). Construction (Design and Management) Regulations 2015.

Mitigation Measure	Description / Details of Measure
	- Welfare facilities and other temporary infrastructure (e.g. construction compound, material laydown, storage areas, etc.) will be set up as determined by the appointed contractor(s); - Temporary fencing / hoarding will be erected around relevant perimeters at the outset of construction and temporary secure access gates will be provided to manage the movement of vehicles, plant, equipment and personnel; - All construction activities will be in accordance with the Considerate Constructors Scheme; - Good practice guidance for water efficiency on the Site will be stipulated and monitored; - Construction working hours would be 08:00 to 18:00 Mondays to Friday; 08.00 to 13:00 on Saturday. There will be no construction on Sundays, Public and Bank Holidays. Exceptions to these working hours will be agreed with Wiltshire Council. <u>UXO Management</u> - Communication to all construction workers on UXO risks, safety training by a competent expert and the attendance of UXO supervisors during the groundworks (if appropriate). <u>Transport</u> - Full construction access and traffic arrangements will be agreed with Wiltshire Council prior to construction and captured within a Construction Traffic Management Plan (CTMP). - If hazardous loads were required, they would be subject to relevant legislative provisions such as those for transporting dangerous goods via road under The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009 (as amended)¹⁷². <u>Utilities</u> - Any required diversions of utilities during construction will be undertaken by the relevant Distribution Network Operator (DNO) (or a third party contractor appointed by the DNO), who will operate in line with standard good practice working measures, including accordance with the Construction (Design and Management) Regulations and other health and safety regulations.

¹⁷² The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009, UK Statutory Instruments 2009 No. 1348

Mitigation Measure	Description / Details of Measure
	- Existing utilities and services will be identified (if present) and, where required, disconnected and / or diverted. Appropriate notices and licenses will be sought from the relevant operator; - The preparation of specific method statements and worker awareness briefings where works are undertaken in proximity to utilities; and - Works will be undertaken in accordance with GS6 Avoiding danger from overhead lines¹⁷³ and HSG47 Avoiding danger from underground services¹⁷⁴. <u>Air Quality</u> - The CEMP will be informed by the Institute of Air Quality Management (IAQM) guidance and would include prevention measures, such as screening stockpiles of materials, deployment of windbreak netting and dampening exposed soils as appropriate and set out requirements for ongoing monitoring. It also sets out requirements for ongoing monitoring and liaison with the local community and Wiltshire Council. <u>Lighting</u> Lighting would be controlled through the implementation of best practice measures, informed by the ILP's 'Guidance Note 01/21. The reduction of obtrusive light' and would include: - The use of sufficient lighting units for the task in hand to avoid the need for tall, wide beam lighting units; - Limiting construction lighting and / or perimeter security lighting near to existing residential properties; - The reduction of fixed lighting outside working hours; and - Any requirements for ongoing monitoring and liaison with stakeholders. <u>Waste</u> - Inspecting and classifying waste materials generated by the works in accordance with relevant guidance, such as Waste Classification: Guidance on the classification and assessment of waste¹⁷⁵;

¹⁷³ HSE (2013) GS6 Avoiding danger from overhead lines.

¹⁷⁴ HSE (2014) HSG47 Avoiding danger from underground services.

¹⁷⁵ Waste Classification: Guidance on the classification and assessment of waste (1st edition v.1.1 GB).

Mitigation Measure	Description / Details of Measure
	- All material removal, handling and disposal will be in line with appropriate legislation and guidance (e.g. Control of Pollution (Special Wastes) Regulations 1980¹⁷⁶, The Dangerous Substances (Conveyance by Road in Road Tankers and Tank Containers) Regulations 1981¹⁷⁷, The Hazardous Waste Regulations¹⁷⁸. and Environmental Protection Act 1990¹⁷⁹). - Control measures will be available including spill kits and bunds for liquid run-off, fencing and tarpaulins for wind-blown debris. <u>Soil Resource Management Plan</u> - The plan would confirm the different soil types; the most appropriate re-use for the different types of soils; and the proposed methods for handling, storing and replacing soils on-site. - The aim of the SRMP will be to re-use as much of the surplus soil resources in the design of open spaces and green infrastructure; and to maintain the quality of soils by following good practice guidance on soil handling and storage, particularly to avoid compaction and biodegradation <u>Ground and Earthworks</u> - All earthworks and foundation design will be in accordance with relevant industry guidance, including but not limited to: CIRIA Report C572: Treated ground engineering properties and performance; British Research Establishment document FB75: Building on Fill – Geotechnical Aspects, BS 6031:2009: Code of Practice for Earthworks and HM Government (2013) Approved Document A – Structure. - The mitigation measures identified to reduce exposure to contamination/ground gas, where identified through site investigations (see Ground Investigation Works and Remediation Strategy), during construction activities will be controlled through the implementation of the CEMP. - Measures to prevent the release of any contamination to controlled waters during construction activities will be controlled in line with CIRIA C532: Control of Water Pollution from Construction Sites - Guidance

¹⁷⁶ Control of Pollution (Special Wastes) Regulations 1980.

¹⁷⁷ The Dangerous Substances (Conveyance by Road in Road Tankers and Tank Containers) Regulations 1981.

¹⁷⁸ The Hazardous Waste (England and Wales) Regulations 2005 and CIRIA C741 (2015).

¹⁷⁹ Environmental Protection Act 1990.

Mitigation Measure	Description / Details of Measure
	for Consultants and Contractors (2001) and may be informed by a Piling Risk Assessment if significant contamination is encountered. <u>Flood Risk and Drainage</u> • Temporary surface water drainage will be installed as necessary to mitigate flood risk and sediment loading and, where possible will align with the permanent drainage solution.
Ground Investigation Works and Remediation Strategy	Ground investigation(s) will be undertaken (pre-planning) to determine the underlying ground conditions, the absence / presence, type and distribution of contamination and groundwater conditions. These will be undertaken in line with relevant guidance, such as British Standard 3930:2015 ¹⁸⁰ and BSEN1997: Part 2: 2007 Eurocode 7 ¹⁸¹ . If required, a remediation scheme will be submitted and agreed upon with Wiltshire Council in advance of works taking place.
Archaeology Strategy	An Archaeological and Heritage Baseline Assessment will be provided with the Application which will include a programme of geophysical surveys across the entirety of the EIA Study Area's open areas which will inform a scope for trial trenching. Trial trenching will be undertaken during the determination period, as agreed with Wiltshire Council Archaeology Service.
Building safety strategy and site security	The final end-users/building management company will have in place the required emergency producers/practices (i.e. Fire Emergency Evacuation Plan (FEED)) or apparatus/instruments (i.e. smoke detectors/sprinklers) required by law for commercial occupation. In addition, buildings will be designed with appropriate fire preventative measures (i.e. fire doors, extinguishers etc.) and all external façades and materials will meet the necessary fire resistance standards set out within Building Regulations and by law. The design of the Project for Assessment will be informed by 'Secure by Design' principles and appropriate design and site management measures (including appropriate lighting and passive surveillance of public spaces) will be implemented to ensure that the potential for crime and anti-social behaviour is minimised.

¹⁸⁰ British Standard 5930: 2015 + A1:2020 Code of Practice for Site Investigations.

¹⁸¹ British Standards Institution (2006) Eurocode 7: Geotechnical Design (Report no. BSEN 1997).

Mitigation Measure	Description / Details of Measure
Healthcare Provision / Contributions	Development contribution payments through the appropriate mechanisms (i.e. S106 and/or Community Infrastructure Levy, CIL) towards the delivery of new and/or expanded and/or enhanced local healthcare provision.
Educational Provision / Contributions	The Proposed Development will similarly make proportionate development contribution payments through the appropriate mechanisms (i.e. S106 and/or Community Infrastructure Levy, CIL) towards the delivery of the primary school on the Cumulative Project 1 site and/or towards other expansions/enhancements to local provision to mitigate its impact in relation to the early years and primary phases of education.

Appendix 5.1: Archaeological and Heritage Baseline Assessment

Appendix 5.2: Phase 1 Geoenvironmental Desk Study

Appendix 5.3: Agricultural Land Classification

Appendix 6.1: LVIA Methodology

Appendix 8.1: Noise Assessment