

ENVIRONMENTAL STATEMENT

VOLUME 2 MAIN TEXT

Land north of the A3102, Melksham

Prepared on behalf of Bloor Homes

December 2025



PLANNING
LIMITED

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LIST OF ABBREVIATIONS

BCT	Bat Conservation Trust
BNG	Biodiversity Net Gain
BoCC	Birds of Conservation Concern
CBC	Common Bird Census
CEMP	Construction Environmental Management Plan
CIEEM	Chartered Institute of Ecology and Environmental Management
CroW	Countryside and Rights of Way Act 1981 (as amended)
CTMP	Construction Transportation Management Plan
DEFRA	Department for Environment Food and Rural Affairs
EclA	Ecological Impact Assessment
ECoW	Ecological Clerk of Works
EIA	Environmental Impact Assessment
EPS	European Protected Species
ES	Environmental Statement
GCN	Great Crested Newt
GI	Green Infrastructure
HMA	Housing Market Area
HMMP	Habitat Maintenance and Monitoring Plan
HPI	Habitat of Principal Importance
IEF	Important Ecological Feature
IEMA	Institute of Environmental Assessment
ILP	Institute of Lighting Professionals
LBAP	Local Biodiversity Action Plan
LNR	Local Nature Reserve
LPA	Local Planning Authority
LVIA	Landscape and Visual Impact Assessment
LWS	Local Wildlife Site
MAGIC	Multi-Agency Geographic Information for the Countryside
MHCLG	Ministry of Housing, Communities & Local Government
NERC	Natural Environment and Rural Communities Act (2006)
NNR	National Nature Reserve
NPPF	National Planning policy Framework
NTS	Non-Technical Summary
ONS	Office for National Statistics
POS	Public Open Space
PPG	Planning Practice Guidance
RLGB	Red List Great Britain
RPA	Root Protection Area
SAC	Special Area of Conservation
SINC	Site of Interest to Nature Conservation
SPA	Special Protection Area
SPI	Species of Principal Importance

SSSI Site of Special Scientific Interest
SuDS Sustainable Urban Drainage Systems
WBAP Wiltshire Biodiversity Action Plan
WCA Wildlife and Countryside Act 1981 (as amended)
WCS Wiltshire Core Strategy
WHSAP Wiltshire Housing Site Allocations Plan
WSBRC Wiltshire and Swindon Biological Records Centre
ZOI Zone of Influence

DOCUMENT CONTROL

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1 Introduction

- 1.1 Bloor Homes (the Applicant) have submitted an outline planning application for residential led mixed use development of the land north of the A3102, Melksham.
- 1.2 The Applicants have undertaken an Environmental Impact Assessment (EIA) and have prepared this Environmental Statement (ES) in order to accompany the planning application, in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

THE APPLICATION SITE

- 1.3 The site is identified at Appendix 1.1 and measures approximately 14.95 hectares. It is wholly located within the administrative area of Wiltshire Council. It comprises part of New Road Farm and is grazed modified grassland, divided by hedgerows and hedgerow trees into several field parcels.
- 1.4 It is located approximately 1.8km to the north east of Melksham town centre. The settlement's existing developed limits define the site's western boundary, whilst Sandridge Common (the A3102), is located to the south. Undeveloped land is located to the north, with building associated with New Road Farm and open countryside being located further to the east.

THE PROPOSED DEVELOPMENT

- 1.5 This planning application seeks outline planning permission for:

“...for residential development; public open space including formal play space and allotments; sustainable drainage systems and associated infrastructure; land safeguarded for a nursery and access points for pedestrians and cyclists. All matters are reserved except for access, the principal point of access is to be provided from a new northern arm onto an improved arrangement of the Eastern Way/A3102 roundabout junction and an emergency access onto the A3102.”

- 1.6 The scheme proposals are included in the site layout at Appendix 1.2, with parameters plans in Appendix 4. These plans provide a visualisation of the proposed development scheme which serves as the basis for the EIA that has been undertaken in order to feed into this ES.

THE REQUIREMENTS OF THE EIA PROCESS

The European Union Directive 2011/92/EU (as amended by 2014/52/EU)

- 1.7 EIA is a procedure required under the EU Directives to assess the effects of certain public and private projects on the environment. Article 2 requires, *before development consent is given, projects likely to have significant effects on the environment by virtue, inter alia, of their nature, size or location are made subject to a requirement for development consent and an assessment with regard to their effects on the environment.* Article 8 states that such an assessment is to be duly taken into account in the development consent procedure. These requirements are transcribed into the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 insofar as they apply to England.

Town and Country Planning (Environmental Impact Assessment) Regulations 2017

- 1.8 The Town and Country Planning Act 1990 (the Act) requires that a person wishing to develop land or change its use seeks planning permission from the Local Planning Authority (LPA).

- 1.9 Certain types of development are categorised as EIA Development because of their nature, size or location as defined by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the Regulations). In such instances, an applicant is required to undertake an EIA.
- 1.10 EIA is the process of assessing the environmental impacts of the development project. The Planning Practice Guidance describes EIA as follows:
- “The aim of EIA is to protect the environment by ensuring that when a LPA is deciding whether to grant planning permission for a project which is likely to have significant environmental effects on the environment, it does so in the full knowledge of the likely significant effects, and takes this into account in the decision making process.***
- “The aim of EIA is also to ensure that the public are given early and effective opportunities to participate in the decision-making procedures.”***
- (PPG Paragraph: 002 Reference ID: 4-002-20140306)
- 1.11 Planning applications for EIA Development must be accompanied by an ES. The ES is the document reporting the EIA and must be provided to the LPA as part of its consenting process.

Screening

- 1.12 Screening is the process to determine whether a proposed development is likely to have significant environmental effects and whether an EIA is required.
- 1.13 In February 2023, pursuant to Regulation 6(1), the Applicant submitted a Screening request (Appendix 1.3) to Wiltshire Council as the LPA in this instance. The purpose of the Screening request was for the LPA to determine whether the proposed development was considered to be EIA development.
- 1.14 On the 11th July 2023, the LPA issued its Screening Opinion in accordance with Regulation 6(6).
- 1.15 In its opinion, the majority of the proposal's impacts would not be of wider significance for the purpose of EIA.
- 1.16 However, the LPA are also of the opinion that:
- “...the cumulative landscape impact due to the quantum of housing on the eastern side of Melksham through already approved planning applications in addition to the proposed number of dwellings as part of the scheme subject to this screening opinion, forming an urban extension to the east of Melksham, it is considered to have the potential to result in significant impacts on the locality and wider area. On this basis the proposed development would therefore require an EIA in this instance.”***
- 1.17 As such, the LPA's formal Screening Opinion, included at Appendix 1.4, is that the proposed development is considered to fall with Schedule 2 of the Regulations, under category 10(b) “urban development” and is EIA Development.

Scoping

- 1.18 Scoping is the process of determining the extent of the assessment to be undertaken and the information to be presented in the ES.
- 1.19 The Applicant submitted a Scoping Report in October 2023 setting out how it intended to undertake the EIA and what it intended to report in the ES. A response was not received from the LPA and a further request was made in July 2024 to reflect a reduced scale of development. A response was received in March 2025 confirming the scope.
- 1.20 Accordingly, the Applicant has prepared the ES in accordance with the latest Scoping Opinion of the Local Authority (appendix 1.6)

- 1.21 The LPA has determined that the proposed development falls within Schedule 2, 10(b) of the Town and Country Planning (EIA) Regulations 2017 (as amended), but that ordinarily, the impact of the development would not have likely significant effects on the environment by virtue of factors such as its nature, size and location that would warrant an Environmental Impact Assessment. However, they determined that due to the cumulative landscape impact of the proposed development alongside other committed developments on the eastern side of Melksham, an EIA was required. In particular the following were noted:
- Land south of Western Way, Bowerhill, Melksham (Ref: W16.1123);
 - Land south of Western Way, Melksham (Ref: W18.4477);
 - Land South of Western Way, Melksham (PL/2022/08504);
 - Land east of Spa Road, Melksham (Ref: 18/04644/REM);
 - Bowden Guest House, 25-27 Beanacre Road, Melksham (Ref: W17.10015);
 - Land east of Semington Road, Melksham (Ref: W17.1251);
 - 3 Lowbourne, Melksham (Ref: W13.7076);
 - Land East of Semington Road, Melksham (Ref: 20/01938/OUT);
 - Park Farm, Seend Cleeve, Melksham (Ref: 20/02213/FUL); and
 - Land at Blackmore Farm (Ref: PL/2023/01949).
- 1.22 A number of additional sites have been identified by the applicant.
- Land to the West of Semington Road, Melksham, Wilts (Ref. PL/2022/08155);
 - Land at Verbena Court, Melksham, SN12 7GG (71 bed C2 care) (Ref. PL/2023/06976); and
 - Land at Longleaze Lane, Melksham, SN12 6QJ (86 bed C2 care) (Ref. PL/2023/06725).
- 1.23 An Environmental Statement has therefore been prepared and has been submitted as part of this application. The work describes the potential environmental effects of the development alone and in combination with other developments proposed in the vicinity of the site. The assessment of the potential environmental effects of the proposed development has concluded that in many respects, overall, the scheme will be beneficial.

STRUCTURE OF THE ENVIRONMENTAL STATEMENT

- 1.24 In the context of the above, and taking into account the Scoping Report prepared by the Applicant, the Structure of this ES is shown in Table 1.1 below.

TABLE 1.1 STRUCTURE OF THE ES

CHAPTER	TITLE	CONTENTS
Chapter 1.	Introduction	This chapter provides summary information about the Environmental Impact Assessment process and the Environmental Statement.
Chapter 2.	Methodology	This chapter describes the broad methodology used in undertaking the EIA and to present the conclusions in the ES.
Chapter 3.	The application site	This chapter provides a description of the application site.

Chapter 4.	Proposed development	This chapter provides a description of the proposed development.
Chapter 5.	Alternatives	This chapter provides description of the reasonable alternatives studied by the developer, that are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment.
Chapter 6.	Socio economic	This chapter presents the assessment of the likely significant effects on socio economics and human health.
Chapter 7.	Transport, accessibility and movement	This chapter presents the assessment of the likely significant effects caused by traffic arising from the project.
Chapter 8.	Biodiversity	This chapter presents the assessment of the proposed developments on the ecology and biodiversity assets within the sites and surrounding area.
Chapter 9.	Landscape and visual	This chapter presents the assessment of likely significant landscape and visual effects of the proposed developments.
Chapter 10.	Cumulative impacts	This chapters considers the combined residual effects on individual environmental receptors - Type 1 effects.
Chapter 11.	Summary	This chapter provides a summary of the technical assessments of each topic matter and a conclusion as to the environmental effects of the proposed development.

THE EIA TEAM

1.25 The EIA process and the ES has been prepared by a team of specialists listed in Table 1.2 below.

TABLE 1.2 THE EIA TEAM

INPUT	ORGANISATION
EIA Co-ordination	LRM Planning Limited
Socio-economic	Hardisty Jones
Transport	Paul Basham Associates
Biodiversity	GE Consulting
Landscape	EDP

ES STRUCTURE

- 1.26 The ES is comprised of the following:
- Volume 1 Non-Technical Summary (NTS);
 - Volume 2 Main Text; and
 - Volume 3 Technical Appendices.
- 1.27 The ES is available to purchase from LRM Planning Limited, 22 Cathedral Road, Cardiff, CF15 9ST for a cost of £75. A version can be provided on a universal storage device for a cost of £10. The Non-Technical Summary is available free of charge.
- 1.28 Comments on the ES should be sent to: Wiltshire Council, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

2 Methodology

- 2.1 This section describes the broad methodology proposed to undertake the EIA and to present the conclusions in the ES.

EUROPEAN UNION DIRECTIVE 2011/92/EU (AS AMENDED BY 2014/52/EU)

- 2.2 EIA is a procedure required under the above EU Directives to assess the effects of certain public and private projects on the environment. Article 2 requires, before development consent is given, projects likely to have significant effects on the environment by virtue, inter alia, of their nature, size or location are made subject to a requirement for development consent and an assessment with regard to their effects on the environment. Article 8 states that such an assessment is to be duly taken into account in the development consent procedure.

TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017

- 2.3 The EIA Directive is enacted into English Legislation in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.
- 2.4 The Regulations apply to two types of projects:
- Schedule 1 Projects for which an EIA is required in every case; and
 - Schedule 2 Projects for which an EIA is required only if the particular project in question is judged likely to give rise to significant environmental effects.
- 2.5 Schedule 3 outlines the selection criteria for screening Schedule 2 development. In this instance it has been deemed that the Proposed Development does constitute Schedule 2 Development under the terms Urban Infrastructure Project under Schedule 2 (10)(b) because of its relationship to nearby development and potential cumulative effects that arise between the two.
- 2.6 Schedule 4 prescribes information to be included in the Environmental Statements.

ENVIRONMENTAL TOPIC AREAS

- 2.7 Regulation 4(2) states that the 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:
- Population and human health;
 - Biodiversity, with particular attention to species and habitats protected under Directive 92/43/EEC (34) and Directive 2009/147/EC(35);
 - Land, soil, water, air and climate; and
 - Material assets, cultural heritage and the landscape.
- 2.8 The EIA process is intended to consider only likely significant effects. The EIA Screening Opinion adopted by the LPA is on the basis that the proposed development in combination with local development proposals give rise to potential significant effects in terms of the following:
- The landscape and visual effects of the proposed development in combination with local development proposals.
- 2.9 This environmental topic area provides the broad scope of the EIA, alongside other topics which the applicant's consultant team consider require scoping into the ES. It follows that certain other environmental topic areas can be scoped out of the EIA. This is discussed in Section 5.

CRITERIA TO ASSESS ENVIRONMENTAL EFFECTS

2.10 The main focus of the EIA process is the prediction and evaluation of the impact of the proposed development on the relevant aspects of the environment. The results and credibility of an EIA depend largely on the methodologies used to assess and determine the effect of a project. Assessing the significance of impacts relies on the interaction between:

- A. The sensitivity of the environmental receptor; and
- B. The magnitude of change to that environmental receptor.

2.11 The Sensitivity of a Receptor / Resource (determined by evaluating a receptors susceptibility to change and value) can be analysed from the baseline information and may be summarised and classified in a table, a rudimentary example of which is provided at Table 2.1.

TABLE 2.1 SENSITIVITY OF ENVIRONMENTAL RECEPTOR / RESOURCE

SENSITIVITY	RECEPTOR
High	The receptor/resource has little ability to absorb change without fundamentally altering its present character, or is of international or national importance.
Moderate	The receptor/resource has moderate capacity to absorb change without significantly altering its present character, or is of high importance.
Low	The receptor/resource is tolerant of change without detriment to its character, is of low or local importance.

2.12 Magnitude of change is the extent to which the Proposed Development will result in a change to an environmental receptor or resource. When assessing the magnitude of change, the scale, duration, timing and extent of effects, as well as the degree of certainty in the prediction of impacts and the likelihood of irreversible changes occurring should all be considered. Table 2.2 defines the type of change and magnitude.

TABLE 2.2 MAGNITUDE OF CHANGE TO ENVIRONMENTAL RECEPTORS / RESOURCE

MAGNITUDE OF IMPACT	CRITERIA FOR ASSESSING IMPACT
Major	Total loss or major/substantial alteration to key elements/features of the baseline (pre development) conditions such as the post development character/composition/attributes will be fundamentally changed.
Moderate	Loss or alteration to one or more key elements/features of the baseline conditions such that the post development character/ composition/attributes of the baseline will be materially changed.
Minor	A minor shift away from baseline conditions. Change arising from the loss/ alteration will be discernible detectable but not material. The underlying character/composition/attributes of the baseline condition would be similar to the pre-development circumstances/situation.
Negligible	Very little change from baseline conditions. Change barely distinguishable, approximating to a 'no change' situation.

2.13 Table 2.3 provides a matrix showing impact significance derived from sensitivity and magnitude of change.

TABLE 2.3 MATRIX OF SIGNIFICANCE OF ENVIRONMENTAL EFFECTS

MAGNITUDE OF IMPACT	SENSITIVITY OF RECEPTOR / RESOURCE		
	High	Moderate	Low
Major	Major	Major-Moderate	Moderate-Minor
Moderate	Major	Moderate-Minor	Minor
Minor	Moderate-Minor	Minor	Minor-Negligible
Negligible	Negligible	Negligible	Negligible

2.14 There is no statutory definition of 'significance'. In this ES the general significance criteria are outline and defined in Table 2.4 below.

TABLE 2.4 DEFINITION OF SIGNIFICANCE OF ENVIRONMENTAL EFFECTS

SIGNIFICANCE OF IMPACT	DEFINITION
Major	An effect which in isolation could have material influence on the decision-making process.
Moderate	An effect which on its own could have moderate influence on decision making, particularly when combined with other similar effects.
Minor	An effect which on its own is likely to have a minor influence on decision making, but when combined with other effects could have more material influence
Negligible	An effect which on its own or in combination with other effects will not have an influence on decision making.

2.15 Impacts can be both positive / beneficial or negative / adverse.

MITIGATION

2.16 Intrinsic to the EIA process is the development of mitigation measures and their incorporation into the proposed development.

2.17 Mitigation measures are divided into three broad categories as set out in Table 2.5.

TABLE 2.5 TYPES OF MITIGATION MEASURES

TYPES OF MITIGATION	EXAMPLES
Inherent mitigation	Measures designed into the scheme and certain to be delivered e.g. the provision of structural landscaping, habitat creation, community infrastructure shown on the parameter plans.
Standard mitigation	Measures which are not commonplace as part of such development proposals and to which there is a high degree of certainty that they will be provided e.g. the preparation of a Construction Environmental Management Plan.
Actionable mitigation	Measures that will be secured by a controlling mechanism as part of a planning permission e.g. planning condition or planning obligation or other legal instrument.

- 2.18 Within each topic chapter, Inherent and Standard Mitigation Measures will be considered as part of the assessment of environmental impacts, and Actionable Mitigation is included as part of the Residual Impact Assessment.

THE SPATIAL SCOPE OF THE ASSESSMENT

- 2.19 The geographical or spatial scope of the EIA has had regard to both the physical extent of the proposed development defined by the site and the nature of the baseline environment, which in certain instances extends beyond the site.
- 2.20 The spatial scope of each topic will be set out in the individual chapter. Some assessments will be limited to the site or its immediate surroundings, while others extend across a wider area.

THE TEMPORAL SCOPE OF THE ASSESSMENT

- 2.21 Potential significant environmental effects are considered for both the construction phase and the operational phase. The broad timescales are shown in Table 2.6.

TABLE 2.6 TEMPORAL SCOPE OF ASSESSMENT

STAGE	TIMELINE
Commencement of Development – site preparation, clearance, and ground works and engineering works	2026/27
Completion of construction of houses and laying out of green infrastructure and engineering works	2032/33
Operational Phase	100 years
Decommissioning	N/A

- 2.22 The terminology for defining periods of time will be as follows unless specified differently in individual chapter:
- Short term 0-5 years;
 - Medium term 5-15 years; and
 - Long Term 15+.

CONSULTATION

- 2.23 Throughout the preparation of the EIA, information will be gathered from a number of relevant range of organisations with whom the applicant will consult. In each of the environmental topic sections organisations are listed who shall be consulted as part of preparing this EIA.

CONSIDERATION OF ALTERNATIVES

- 2.24 Part 2 of Schedule 4 of the Regulations states that information to be included in the ES should include ‘a description of the reasonable alternatives 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.’
- 2.25 The National Planning Practice Guidance note on EIA 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.’
- 2.26 In this instance, the following reasonable alternatives have been identified:

- The do-nothing option: This would mean that development of New Road Farm was not considered further; and
- A different design approach: This would mean that a different configuration of development is assessed.

ENVIRONMENTAL TOPIC CHAPTERS

2.27 The structure of each environmental topic chapter is shown on Table 2.7, albeit this is adapted to suit the specific requirements of each specialism.

TABLE 2.7 STRUCTURE OF ENVIRONMENTAL TOPIC CHAPTERS

SECTION	SCOPE/CONTENTS
Introduction	Outlines the scope of the individual chapter and the nature of the potential environmental impacts to be considered.
Potential effects	Summarises the likely potential effects of the proposed development on the topic chapter.
Policy and Legislative Framework (if applicable)	Summarises the key policy and legislation that is to be taken into account in each topic chapter.
Assessment methodology	Refers to the specific methodology used within the chapter and is structured around the following headings (subject to the specific requirements of individual areas of specialism): 3.1 study area; 3.2 consultation; 3.3 legislative / planning policy context; 3.4 assessment of process; 3.5 assessment criteria; 3.6 sources of information; 3.7 assumptions; and 3.8 assessment limitations
Baseline conditions	The section provides more detailed topic specific information to describe the character of the site and its environs (the study area). This baseline situation describes the quality of the interests on the application site as they relate to this environmental topic. This description serves as a comparative measure against which changes arising from the construction and operational phases of the proposed development can be assessed or predicted. This will identify the sensitivity of environmental receptors (i.e. high, moderate or low by reference to Table 2.1).
Inherent and standard mitigation	A summary description of those 'inherent' and 'standard' mitigation measures which primarily address the scope to avoid, reduce or remedy adverse environmental impacts or enhance the beneficial aspects arising from the construction and operational periods of the proposed development relating only to the topic chapter. Actionable mitigation is considered in the assessment effects to establish residual effects.
Assessment of environmental impacts	The identification and assessment of the nature, extent, magnitude of change that the proposed development will have on individual receptors (ie major, moderate, minor, negligible, by reference to Table 2.2). By employing the sensitivity of the receptor and magnitude of change, the significance of

	environmental effects (including any, direct or indirect effects), which arise as a result of the construction and operational periods of the proposed development will be determined. This assessment will consider inherent and standard mitigation (e.g. strategic landscaping, habitat creation etc that is part of the proposed development).
Actionable mitigation	The identification of actionable mitigation employed where applicable to reduce the negative effects of the proposed development.
Residual impact assessment	This section will identify Residual Effects: A description and assessment of significance of any effects that will remain after the inherent, standard and actionable mitigation measures are applied. These effects will be determined to be Substantial/Major, Moderate, Minor and Negligible.
Cumulative effects	The identification and assessment of the nature, extent, magnitude and significance of inter-project effects (i.e. different effects on the same receptor/resource).
Summary	Overall Summary and conclusions of the assessment.

3 The application site

SITE CONTEXT

- 3.1 The site, which is identified at Appendix 1.1, consists of land located to the east of Melksham, which is itself situated within the western portion of Wiltshire. The settlement is located approximately 9km to the north east of Trowbridge and 9km to the south of Chippenham.
- 3.2 Melksham is identified as being a 'market town' within Wiltshire Council's current Development Plan, which, reflecting its role and function, means that it is a settlement that has the potential for significant development. Given its strategic status, Melksham provides a number of community facilities, including primary and secondary school provision, nurseries, community centres and meeting halls, places of worship, leisure and sports facilities, the new community campus, supermarkets, public houses, post offices, doctor's surgeries, a community hospital, public transport provision, including a train station and employment provision.

THE SITE

- 3.3 The application site measures approximately 14.95 hectares. It is located approximately 1.8km to the north east of Melksham town centre and is irregular in shape. It is bounded:
- to the west by mature hedgerows and trees. Residential development is located further to the west (the recently completed Sandridge Place development);
 - to the east by mature hedgerows and trees. Buildings associated with New Road Farm are located beyond the hedgerows. Open countryside is located further to the east;
 - to the south by mature hedgerow and boundary enclosures, including a field gate. The A3102 (Sandridge Common) is located beyond the hedgerow. Residential development and open countryside are located further to the south; and
 - to the north by mature hedgerow, with open countryside beyond.
- 3.4 Mature hedgerows and trees divide the site into several field parcels. At present, it is predominantly used for agricultural purposes. There are no existing built structures on the site.

TOPOGRAPHY

- 3.5 The site is relatively flat, with a gentle sloping topography. It falls to the watercourse located centrally within the site at approximately 42.5AOD. The east of the site falls from a topographic high of 45AOD and the west from approximately 44AOD.

LANDSCAPE

- 3.6 The site is not located within a national, local or any other landscape designation.

BIODIVERSITY

- 3.7 The site is not subject of any nature conservation designations. There are however, the following international, national and local designated sites of importance for biodiversity within the wider environs:

National Site Network

- a component of the Bath and Bradford-upon-Avon Special Area of Conservation (SAC) lies approximately 9km to the north west of the application site. However, the site is not located within any of the 'core areas' associated with the SAC.

Nationally designated sites

- no nationally designated sites lie within 2km of the site.

Local wildlife sites

- the following non-statutory Local Wildlife Sites (LWS) are located within 2km of the site:
 - Bristol Avon River LWS – c.1.15km to the west;
 - Eighteen Acre Plantation LWS – c.1.3km to the east;
 - Hanging Wood LWS, c. 1.6km to the east;
 - Morass Wood LWS, c. 1.75km to the east; and
 - Conigre Mead WWT Reserve LWS, c. 1.8km to the west.

3.8 The site itself comprises four fields of grazed modified grassland, with little to no margins. The fields are divided by a network of hedgerows, most of which are species poor except for one species-rich hedgerow which runs along the northern boundary of the site. Ditches run alongside most hedgerows. As described below, there are some trees present within the site, the majority of which are associated with the western boundary hedgerow and the farm buildings to the east. However, a single veteran oak is present in the northern-most field. A small area of bare ground is located in the north eastern area of the application site, adjacent to the eastern boundary. Watercourses also run through the site.

3.9 The site supports a reasonably diverse assemblage of foraging and commuting bats (including low usage by rare light averse Annex II species), as well as badgers, breeding birds and dormouse. A single tree along the eastern boundary has potential to support roosting bats.

3.10 In overall terms, the habitats supported by the site are of low ecological value.

Arboriculture

3.11 An industry compliant BS5837:2012 tree survey has been carried out on the site and along its boundaries. It has shown that the site contains the following tree and hedgerow features:

TABLE 3.1 A SUMMARY OF THE ARBORICULTURAL AND HEDGEROW FEATURES FOUND WITHIN THE SITE

CATEGORISATION	CATEGORY A	CATEGORY B	CATEGORY C	CATEGORY U
Tree	-	2	-	-
Tree group	-	3	2	-
Hedgerow	-	-	4	-

3.12 The tree stock is considered to be of a low to moderate amenity value. There are no trees that are subject of a Preservation Order within the site.

Flood risk

- 3.13 The Environment Agency Flood Map for Planning identifies that the majority of the site is located within Flood Zone 1. Consequently, it is outside the 1 in 1000-year extent of fluvial flooding (0.1% annual exceedance probability) and is therefore at low risk.
- 3.14 There is however an unnamed watercourse that runs broadly south to north centrally within the prospective application site. This watercourse, which is a Main River and a tributary of the River Avon, originates from a 600mm culvert on the southern boundary of the application site. It conveys flows north from a culvert along the site's southern boundary. The watercourse is uniform in shape, with an approximately 1m bed width, a 3.5 width at the top of the bank, a 1.5m depth and approximately 1:3 slopes. The Environment Agency Flood Map for Planning identifies that this watercourse falls within Flood Zone 2.
- 3.15 A second 'ordinary' watercourse conveys flows to the east through the centre of the site from the balancing pond from the existing residential development to the west. It joins the Main River in the centre of the application site. Two land drain are also located on the site's eastern boundary and conveys flows to the north. Several ditches act as informal field boundary ditches within the application site.

Cultural heritage

- 3.16 There are no Scheduled Monuments or other designated heritage assets within the application site. The site also is not located within a Conservation Area. No Registered Parks and Gardens or World Heritage Sites are within the site, or the surrounding area (1km).

Agricultural land classification

- 3.17 As indicated above, the site is previously undeveloped, agricultural land. DEFRA's online database suggests that the application site is Grade 3b agricultural land. Consequently, it is not considered to be best and most versatile agricultural land.

Access and accessibility

- 3.18 The site's southern boundary is defined by the A3102. A roundabout, which provides a junction between the A3102 and Eastern Way, is located along the site's frontage. An existing footway is located to the south of the A3102, which provides a connection from the east of the A3102/Eastern Way roundabout to the west, towards Melksham Town Centre. A footway on the northern side of the A3102 commences to the south of the Sandridge Place development, which itself is located to the west of the site. It again provides a connection to the west, towards Melksham Town Centre.
- 3.19 The site is within walking distance of a range of services and facilities, including:
- retail facilities, including two convenience stores located approximately 600m and 750m to the west of the site;
 - two public houses, which are located approximately 750m to the west and 975m to the south;
 - education facilities, including Forest and Sandridge Church of England Primary School, which is located approximately 800m to the south of the site;
 - hot food takeaways; and
 - places of worship.
- 3.20 Additional services and facilities can be found within a modestly longer walking distance (but within an acceptable cycling distance) and include:
- Secondary school provision, which is approximately 3.2km to the south;
 - Melksham Town Centre;
 - a number of supermarkets; and

- employment opportunities, including within the Town Centre, around Bath Road and at Bowerhill Industrial Estate.

- 3.21 National Cycle Route (NCR) 403 is located approximately 1.3km to the west of the site, at King George V Park (a 5 minute cycle journey time). From King George V Park, the route runs to the north towards Lacock (a 21 minute cycle journey time) and Chippenham (a 21 minute cycle journey time). It also provides a link to National Cycle Route 4, which is located approximately 3.km to the south (11 minute cycle journey time). National Cycle Route 4 provides direct, off-road links to Trowbridge (a 37 minute cycle journey time) and Devizes (a 56 minute cycle journey time).
- 3.22 The area is served by a number of bus services. The closest bus stop on the A3102 is located approximately 500m to the west of the site. It is served by bus service X76 which provides a connection once a day in both directions between Bath and Marlborough during the week. Additional bus services route through the development to the south. The closest bus stop on this route, Skylark Road, is located approximately 330m to the south. This bus stop, which is a request stop, is served by bus services 14 and 15, which provide a circular route into Melksham and back. Further services are provided from the Ingram Road bus stop, which is located on Blackmore Road, which is approximately 750m to the west and is served by bus services 271, 272 and 273. The services provide connections to a range of destinations within Melksham, including supermarkets and employment opportunities (the Town Centre and Bowerhill Industrial Estate), as well as destinations further afield, including Bath and Devizes. Together, they typically provide an hourly service during the week and on Saturdays, with a less frequent service on a Sunday.
- 3.23 Melksham Railway Station is located approximately 2.5km from the application site. Located on the Great Western Railway Line, the Railway Station provides services to a range of destinations, including Trowbridge, Chippenham, Swindon and Westbury.

Public Rights of Way

- 3.24 There are no Public Rights of Way (PRoW) that cross the site, but there are a number in close proximity to it. These include:
- MELK103 – which is located to the south of the south west corner of the site and to the south of the A3102. It runs in a broadly southerly direction and connects the footway on the southern side of the A3102 with PRoW MELK104. Via Snarlton Lane and a series of other footpaths on the PRoW network, it provides onward connectivity to Melksham Town Centre.
 - MELW60 – which is a footpath that runs broadly north east to south west and is located to the north of the site; and
 - MEDK45 – which is located to the west of the western edge of PRoW MELW60 and extends to Sherwood Avenue. It runs broadly north east to south west.

4 The proposed development

4.1 This Section describes the proposed development and its components.

OVERVIEW

4.2 This outline planning application proposes:

“...residential development; public open space including formal play space and allotments; sustainable drainage systems and associated infrastructure; a 100 place nursery and access points for pedestrians and cyclists. All matters are reserved except for access, the principal point of access is to be provided from a new northern arm onto an improved arrangement of the Eastern Way/A3102 roundabout junction and an emergency access onto the A3102..”

4.3 The proposed development:

- a) includes a variety of energy efficient housing types and tenures;
- b) a 100 place nursery;
- c) propose a landscape structure that builds on, and enhances existing assets, providing extensive green infrastructure within the development, including food growing opportunities, formal play provision and a sustainable drainage system;
- d) provide an appropriate net gain for biodiversity;
- e) allow for pedestrian, cycle and public transport networks to be integrated within the scheme, in a manner that provides easy access to the services, facilities and employment opportunities that will come forward as part of the development (the nursery and public open space provision) and exist within the wider environs; and
- f) provide for necessary supporting infrastructure.

LAND USE COMPONENTS

4.4 This planning application seeks planning permission for the following principal components:

- a) primarily residential development as shown on the illustrative master plan;
- b) a 100 place nursery;
- c) a primary access from a new northern arm onto an improved arrangement of the Eastern Way/A3102 roundabout junction;
- d) an emergency access from the A3102 in the south western corner of the site which will include a pedestrian and cycle connection to the A3102;
- e) three pedestrian and cycling crossing points along the A3102;
- f) a pedestrian, cycle and vehicular connection to the northern boundary of the site;
- g) a street hierarchy, with a primary movement route that passes centrally through the development, from the proposed primary access;
- h) a multi-functional network of green and blue infrastructure of varying typologies, including recreation, food growing areas and attenuation. Together, these will result in an appropriate biodiversity net gain;

- i) play space, including two Locally Equipped Areas of Play (LEAPs) and two Local Areas of Play (LAPs); and
- j) the inclusion of green corridors, including along the existing watercourse that runs from the A3102 to the north, and through, where feasible, the retention of hedgerows and hedgerow trees.

4.5 The land use budget for the scheme is:

TABLE 4.1 LAND USE BUDGET

LAND USE	AREA (HA)
Built area including residential, incidental landscaping and associated infrastructure	9.01
Green infrastructure including public open space, allotments, SuDs, play areas, existing vegetation to be retained and PrOW	4.65
Sustainable drainage systems	0.72
Existing highways	0.89
Nursery land	0.4

4.6 A summary of each of the main components of the proposed development is provided within the following paragraphs.

HOUSING

4.7 As the principal land use, residential development extends across the application site. The application is based on the illustrative master plan which shows how the site could accommodate the construction of 295 dwellings, which is one option for the site and it consists of maisonettes, bungalows, terraced, semi-detached and detached properties.

Housing mix

4.8 The illustrative layout is based on the following illustrative mix, which again is one option as to how this can proceed but is used as the basis for the assessment of the site.

TABLE 4.2 HOUSING MIX

DWELLING SIZES	TOTAL	PERCENTAGE (%)
1 bed	49	16.6
2 bed	57	19.3
3 bed	98	33.2
4 bed	91	30.8

4.9 The scheme provides a mix of approximately 81% houses and bungalows and 19% maisonettes.

Affordable housing

4.10 It is proposed that the application will comprise of 40% affordable housing. It is proposed that this would comprise:

- 64% affordable rent;
- 13% shared ownership; and
- 23% first homes.

Custom housing

- 4.11 The application proposes that 5% of the proposed dwellings will be made available as custom housing. The location of the custom build plots will be determined at the detailed planning stage.

Nationally derived space standards

- 4.12 All the homes proposed within the application will be designed at the detailed stage to meet the minimum space standards as outlined in the Nationally Derived Space Standards (NDSS).

Accessible and adaptable housing

- 4.13 It is anticipated that 84% of dwellings will be designed to meet Building Regulations M4(2) standards, with a further 7% of units meeting M4(3) standards.

ACCESS

Principal point of access

- 4.14 The primary access from a new northern arm onto an improved arrangement of the Eastern Way/A3102 roundabout junction. This will comprise a 'compact' style roundabout. The benefits of this approach are that it would:
- alleviate the reverse curvature of the existing roundabout approach;
 - help to reduce road speed;
 - aid pedestrian/cycle crossings, due to the reduced width of the carriageway; and
 - further reflect the more urbanised nature of the area, once the development has been completed.
- 4.15 The design complies with DMRB CD116 guidance. Specifically, the ICD of the roundabout is 36m, are a consistent 4m width, with 1m a hatch alongside, enabling a circulatory carriageway of 6m, with all exit arms being 4.5m wide. Swept path analysis has been undertaken which demonstrates that the largest vehicles can navigate it.
- 4.16 The application also proposes a 3m wide footway/cycleway on the western arm of the A3102/Eastern Way junction. This footway/cycleway will provide a connection from the proposed development to the existing pedestrian/cycle infrastructure to the south of the A3102. This shared footway/cycleway has been designed to meet the standards outlined in LTN1/20.
- 4.17 The design for the proposed principal point of access is provided at Appendix 4.4.

Secondary access

- 4.18 An emergency vehicular access onto the A3102 is proposed approximately 200m west of the existing A3102/Eastern Way roundabout, in the south western portion of the site. The emergency access will be 3.7m wide, with a bollard in place to limit access by vehicles.
- 4.19 The emergency access will also provide a pedestrian and cycle connection to and from the A3102. A signalised pedestrian crossing point is proposed to the south west of the emergency access, which will connect the application site with existing footway provision on the southern side of the A3102.

Other pedestrian access

- 4.20 It is proposed that an additional signalised pedestrian crossing point is provided approximately 70m to the east of the existing roundabout. A footway will connect the proposed footway provision on the principal street with the proposed signalised pedestrian crossing point.

Internal circulation

- 4.21 The proposed development includes a hierarchy of streets and connections which is to be set out in detail at the Reserved Matters stage, as follows:
- a primary street – which will connect to the proposed new fourth arm of the A3102/Eastern Way roundabout and will run to the site's northern boundary.
 - secondary streets – which will measure between 4.8m and 5.5m wide, which is a sufficient width to allow two private vehicles to pass without conflict;
 - community streets – which have been designed to be 8m wide shared surfaces, which is a sufficient width to allow two private vehicles to pass without conflict; and
 - shared surfaces/private drives – which are 4.5m and 4.8m wide.
 - a number of other footways / cycle ways are proposed within the development along with a number of connections

CAR AND BICYCLE PARKING, EMERGENCY VEHICLES, REFUSE AND RECYCLING

- 4.22 Car parking provision will be provided in accordance with the Council's parking standards and is anticipated to be subject to detailed design. Different parking typologies are likely to be proposed across the scheme, including frontage parking, rear parking, tandem parking to the side of the dwelling and on-street parking. The scheme also includes garages.
- 4.23 It is noted that based on the illustrative plan, the scheme would provide 644 allocated spaces for residents, which includes garages. Additionally, a further 57 car parking spaces are provided for visitors.
- 4.24 In addition, the applicant is committed to providing 100% coverage of electric vehicle charging points within the development.
- 4.25 Cycle parking will be provided for each home, either in garages or within the curtilage of each property, in a cycle shed.
- 4.26 It is anticipated that the detailed design stage would ensure that the Council's requirements in respect of emergency vehicles and refuse will be achieved.

LANDSCAPING & PUBLIC OPEN SPACE

Landscape strategy

- 4.27 The green infrastructure strategy aims to create an attractive landscape framework that surrounds and permeates through the proposed development, which incorporates key characteristics and guidance contained within the published landscape character assessment, as well as the aspirations of the emerging policy framework for the site. The landscape framework will comprise a series of open spaces that differ in character and function to create a natural transition, responding to the edge of settlement location.
- 4.28 An in-depth analysis of the site and its immediate context has identified a network of existing vegetative habitats that are connected to linear habitats in the wider landscape. The design

principles place value on the retention of existing vegetation wherever possible and aims to create new complimentary habitats that enhance the local character, as well as maximise the benefits afforded to wildlife. Measures embedded within the overall landscape design that act as landscape mitigation include:

- the retention and enhancement of established mature planting along the site's boundaries, to create a sense of enclosure and soften visual effects;
- no vehicular access being taken from the sites eastern boundary, to protect the character and rhythm of the existing landscape fabric in this location and the transition to open countryside;
- existing vegetation to be retained and enhanced as part of the landscape proposals, which forms green corridors across the centre of the site and around its peripheries;
- the retention and enhancement of the existing watercourse, which is afforded an appropriate buffer, for ecological and recreational benefit; and
- new tree planting will be used to complement the existing, particularly in the northern and eastern areas of the site.

4.29 Additionally, a number of landscape enhancement measures are proposed, which include:

- the sustainable drainage system (SuDS), which, as described below, comprises a network of swales and basins. The system aims to achieve a sustainable solution that balances water quality, biodiversity, flood resilience and recreation opportunities;
- separating the proposed development from existing development to the west by retained vegetation;
- the inclusion of play provision and public open space, which will be used by the new residents of the development and the wider community. The play provision has been located centrally within the development. This ensures that they are safe and easy to access for all age groups, as well as benefitting from natural surveillance. Alongside the formal equipped play, incidental play will be introduced around the scheme to offer 'play-on-the-way' opportunities;
- the provision of recreational routes throughout the proposal, which will increase permeability and access to green and blue infrastructure;
- productive landscapes in the form of allotments and community grow space are proposed, which will benefit the new residents of the development and the wider community; and
- green corridors will be created for ecological and community benefit, as well as to soften the effect of the built form and to provide additional dormouse habitat mitigation.

4.30 Tree planting will be provided throughout the development, both within areas of public open space and streets. Alongside proposed ornamental planting, the landscape proposals will help to differentiate the character areas of the various area types and street hierarchy.

Public open space

4.31 The proposed development includes a range of differing public open space typologies, that are intended to serve the future residents of the development. The green infrastructure (as shown in the parameters plan at appendix 4.4) comprises 4.65ha and is made up of:

- allotments (0.17ha);
- amenity green space (2.20ha);
- parks and recreation grounds 0.78ha);
- play space (0.17ha);
- natural green space (1.27ha); and
- restricted green space (0.06ha)

FLOOD RISK, SURFACE WATER DRAINAGE AND FOUL WATER INFRASTRUCTURE

Existing surface water flood risk

- 4.32 A baseline hydraulic model was prepared by the applicant. Whilst the outputs of the model indicated that the Environment Agency mapping overestimated the surface water flood risk within the site, some flood risk remained and therefore there were a number of opportunities to reduce flood risk further. A number of measures were identified, including:
- the removal of a ditch that runs south to north in the south western area of the site (known as Ditch D);
 - the removal of a ditch that runs from New Road Farm to the centre of the site (known as Ditch C);
 - the removal of a ditch that runs south to north in the eastern area of the application site (known as Ditch H);
 - the shortening of a ditch that runs along the eastern boundary of the application site (known as Ditch E);
 - the introduction of a swale on the northern boundary of the application site, which is to intercept highway drainage;
 - the introduction of a swale on the eastern and southern boundary of the application site. Its purpose is to intercept surface water flows from Ditch E to the Main River. Two crossings are required within this proposed swale, to facilitate the principal point of access into the proposed development.
- 4.33 With the introduction of these betterments, residual surface water pathways in the eastern and southern areas of the development that were shown in the baseline scenario are intercepted and conveyed around the development to the point of discharge. The modelling also shows that there would be no increase to flood risk downstream and that the flood extent to the east of the application site would reduce, which is a benefit of the development.
- 4.34 The proposed swales and culverts have been designed to convey the 1 in 100-year return event, plus a 71% climate change allowance.

Surface water drainage strategy

- 4.35 To mitigate the risk of surface water flooding within and from the development, a surface water drainage/SuDs strategy has been developed. This strategy involves attenuating surface water run-off at source, via a combination of swales, a surfaced water piped network and attenuation ponds, prior to discharge into the Main River.
- 4.36 The post-development surface water drainage strategy will restrict peak flows for all events from the impermeable areas to the greenfield run-off rate (QBAR), thereby ensuring that the risk of surface water flooding does not increase both on the site and within the surrounding area, with the potential for a betterment to be achieved.
- 4.37 The surface water drainage system has been suitably sized to accommodate the 1 in 100-year storm event, plus an allowance for climate change (45%).

Foul water strategy

- 4.38 Foul water from the proposed development is to drain via gravity towards a pumping station, which is located in the northern area of the proposed development. Flows will then discharge into a proposed manhole within the site from which it will discharge via gravity to an existing Wessex Water Foul Sewer, located within the A3102.

Fluvial flood mitigation

4.39 The main River that flows through the site is located in Flood Zone 2. Other than essential infrastructure and green infrastructure, no development, including residential development, is proposed to be located within the mapped extent of fluvial flooding. Indeed, other than essential infrastructure, an 8m easement is to be provided along the Main River, and a 4m easement is provided to the ordinary watercourse within the site. Where crossings are proposed, the culverts will be open span and have been designed to convey the 1 in 100 year plus a climate change event, with a freeboard allowance. Additional 3m easements are also provided for each of the proposed swales. The finished floor levels of the proposed homes have also been set to be 150mm above external levels.

ENERGY AND LOW CARBON

4.40 The proposed development will incorporate a range of measures to reduce its energy requirements in the first instance, before seeking to meet a significant proportion of the energy demand from renewable and low energy sources. This will be achieved through:

- utilising passive design measures;
- enhancing the thermal performance of the proposed homes to a level above that required by current Building Regulations;
- incorporating energy efficient and sustainable mechanical and electrical systems, including air source heat pumps; and
- employing renewable energy systems, in the form of photovoltaic panels.

5 Alternatives

- 5.1 Part 2 of Schedule 4 of the Regulations states that information to be included in the ES should include ‘a description of the reasonable alternatives 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.’
- 5.2 The National Planning Practice Guidance note on EIA states that ‘where alternative approaches to development have been considered, the ES should include a description of the reasonable alternatives studied which are relevant to the proposed development.’
- 5.3 In this instance, the following reasonable alternatives have been identified:
- The *do-nothing option*: This would mean that development of New Road Farm was not considered further.
 - A *different design approach*: This would mean that a different configuration of development is assessed.
- 5.4 No alternative site to receive this development has been assessed as the site has been identified as a draft allocation in the emerging Wiltshire Local Plan, therefore another area of land is not considered a reasonable alternative.

THE DO-NOTHING OPTION

- 5.5 In the “do nothing” scenario the proposed development would not proceed. The land is currently predominantly used for agricultural purposes and would continue with this current use.
- 5.6 The site is a draft allocation in the emerging Wiltshire Local Plan for residential development. In this scenario the benefits of developing this draft allocated site would not be realised. The contribution of housing this scheme would have towards meeting identified housing needs would not occur and the quantum of housing included in the allocation would not be delivered. This would give rise to the risk of a shortfall in housing delivery.
- 5.7 The environmental benefits including green infrastructure, public open space, onsite habitat creation, highways works and biodiversity net gain would not be achieved.
- 5.8 It is considered that this scenario would be in clear conflict with the emerging Wiltshire Local Plan.
- 5.9 On the basis of the judgement that the beneficial effects of the scheme are considered greater than the adverse environmental effects, and that the environmental effects are not considered to preclude the proposed development in any event, the Applicant has chosen to proceed with the scheme, as part of the allocation, rather than the “do nothing” alternative.

A DIFFERENT DESIGN APPROACH

- 5.10 The application site is subject to a number of constraints that to a large extent dictate the form of development. These include environmental, heritage and highways considerations. Furthermore, the Council have produced an illustrative plan for the site within the emerging Local Plan which has shaped the proposals.
- 5.11 The character of the development, and the density of housing, and the overall amount of new housing is considered appropriate in the context of the site, its draft allocated status and its surroundings. A lesser number of new homes would not represent an efficient use of land and would not reflect the quantum of development anticipated in the emerging Wiltshire Local Plan.
- 5.12 Conversely, a greater number of dwellings could be achieved but would require a greater density of development which would be out of keeping with the context of the site and its surroundings and give rise to potentially different environmental effects.

- 5.13 On the basis that the arrangement of development is considered the most appropriate and does not give rise to major adverse environmental effects that would preclude development, the Applicant has chosen to proceed with the Scheme as submitted, which has been arrived at through the design process and based on the Council's scheme.

6 Socio economics

INTRODUCTION

- 6.1 This chapter of the ES assesses the likely significant effects of the Proposed Development on socio-economic receptors. It has been prepared by Hardisty Jones Associates (HJA). HJA is a specialist socio-economic development consultancy that works with public and private sector stakeholders across the UK to understand the socio-economic impacts of a variety of development types.
- 6.2 This chapter details the methodology, legislative and policy context, current and future baseline conditions, assessment of significant effects, cumulative effects, mitigation and enhancement measures, and residual effects.
- 6.3 The assessment of socio-economic effects considers the impacts of the construction and operational phases of the Proposed Development on economic, housing, population, and community receptors in the defined socio-economics study areas.

POLICY CONTEXT

- 6.4 This section sets out the relevant legislation and policy that has been considered in preparation of the assessment.
- 6.5 There is no legislation relating to the assessment of socio-economic impacts.
- 6.6 The assessment considers a range of national and local adopted and draft policies including:
- National Planning Policy Framework (NPPF), Ministry of Housing, Communities and Local Government (2023);
 - Planning Practice Guidance, Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government (2016, as updated);
 - Wiltshire Core Strategy, Wiltshire Council (2015);
 - Local Plan review (Reg 19) (released autumn 2023);
 - Strategic Housing and Economic Land Availability Assessment, Wiltshire Council (2017);
 - Wiltshire Infrastructure Delivery Plan 3, Wiltshire Council (2016);
 - Review and Update of the Wiltshire Infrastructure Delivery Plan (2023); and
 - Joint Melksham Neighbourhood Plan 2 2020-2026 (2021).
 - Joint Melksham Neighbourhood Plan 2 2020-2038 (Pre-consultation draft B) (2024).

National Planning Policy Framework (NPPF)

- 6.7 The NPPF sets out how Local Plans and decisions should provide for sufficient housing and other development in a sustainable manner and ensure effective use of land is promoted.
- 6.8 Paragraph 7 specifies that the purpose of the planning system is to achieve sustainable development, including the provision of homes, commercial development, and supporting infrastructure in a sustainable manner.
- 6.9 Paragraph 8 notes there are economic, social, and environmental overarching objectives to help achieve sustainable development:
- The economic objective aims to build strong, responsive and competitive economies, ensuring sufficient delivery of land at the right time and places to support growth.
 - The social objective aims to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations and support their well-being.

- The environmental objective aims to protect and enhance the natural, built and historic environment and make effective use of land.

- 6.10 Paragraph 11a notes that plans should promote sustainable development and seek to meet the development needs of their area and align growth and infrastructure.
- 6.11 Paragraph 60 notes that it is important that a sufficient amount and variety of land can come forward where needed to support the Government's objective of significantly boosting supply of homes. The aim should be to meet as much of an area's identified housing need as possible, including with an appropriate mix of housing types for the local community.
- 6.12 Paragraph 74 sets out how the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns, provided they are well located and designed, supported by necessary infrastructure and facilities. 74b specifies that larger scale developments should ensure that their size and location will support a sustainable community, with sufficient access to services and employment within the development itself or in larger towns to which there is a good access to.
- 6.13 Paragraph 85 notes that policies and decisions should help create the conditions in which businesses can invest, expand, and adapt, and local business needs and wider opportunities for development should be taken into account. Paragraph 86c notes that planning policies should seek to address potential barriers to investment, such as adequate infrastructure, services or housing.

Planning Practice Guidance (PPG)

- 6.14 The PPG sets out guidance on assessing the need for and supply of housing. The assessment of need should be evidence based and needs to be coordinated around the community and Local Policy/Plans.
- 6.15 The PPG notes plans should seek to meet the development needs of their area, including community facilities such as schools. The phasing and delivery of housing growth should be coordinated with the delivery of new school places to ensure that there is sufficient school capacity available at the right time¹.
- 6.16 The PPG notes the Government is committed to ensuring more homes are built and is supportive of authorities who want to plan for growth. It notes there are circumstances where it might be appropriate to plan for a higher housing need figure, such as where increases in housing need are likely to exceed past trends. Such increases could be due to factors such as improvements in strategic infrastructure which are then likely to drive an increase in the homes needed locally.²

Wiltshire Core Strategy

- 6.17 The Strategy sets out a vision for Wiltshire aiming to create stronger, more resilient communities and ensure an appropriate balance of jobs, services and facilities and homes. It also aims to encourage the most sustainable pattern of development that minimises travel and aims to create an environment to deliver economic growth and deliver employment needs to local populations.
- 6.18 The Core Strategy's third strategic objective makes the provision for at least 42,000 new homes in the plan period, to include an appropriate mix of housing types that align to jobs growth in Wiltshire.
- 6.19 **Core Policy 1 (Settlement strategy)** notes that market towns, which includes Melksham, have the potential for significant development that will increase the jobs and homes, which help to sustain and enhance services and facilities, promote better levels of self-containment, and create sustainable communities.

¹ Paragraph: 008 Reference ID:53-008-20190722. Revision date: 22 07 2019

² Paragraph: 010 Reference ID: 2a-010-20201216. Revision date: 16 12 2020

- 6.20 **Core Policy 2 (Delivery strategy)** reiterates the Strategy's third strategic objective. This policy sets out an indicative housing requirement of 2,240 for Melksham Town (see Appendix 6.2) and 130 in Melksham Remainder (see Appendix 6.2), which will aim to be delivered over the plan period.
- 6.21 The Core Strategy sets out a Melksham area strategy which notes that the area has a high degree of economic out-commuting but has good opportunities to expand its employment base and regenerate the town centre. **Core policy 15 (Spatial strategy for the Melksham Community Area** (see Appendix 6.2)) reiterates the indicative housing requirement set out in Core Policy 2.
- 6.22 Table 6.1 shows the delivery of housing for the Melksham Community Area over the plan period, identifies the proportion of housing already completed or permitted, and sets out the remaining housing figures needed to meet the established requirement.

TABLE 6.1 DELIVERY OF HOUSING 2006 TO 2026 – MELKSHAM COMMUNITY AREA

	REQUIREMENT 2006-2026	HOUSING ALREADY PROVIDED FOR		HOUSING TO BE IDENTIFIED	
		COMPLETIONS 2006 - 2014	SPECIFIC PERMITTED SITES	STRATEGIC SITES	REMAINDER TO BE IDENTIFIED
Melksham Town	2,240	1,239	390	0	611
Melksham Remainder	130	69	10	0	51
Melksham Community Area total	2,370	1,308	400	0	662

Source: Wiltshire Core Strategy: 2006 to 2026 (Wiltshire Council, 2015)

- 6.23 Core Policy 43 (Providing affordable homes) sets out that on sites of five or more dwellings within Melksham, at least 30% (net) should be affordable housing provision.

Wiltshire Local Plan Review (pre-submission draft 2020-2038 - Regulation 19)

- 6.24 The Local Plan Review aims to review and update the Wiltshire Core Strategy adopted in 2015 and revises the plan period to cover 2020 to 2038. It sets the spatial vision to create better communities, with access to housing and employment opportunities and sets out the ambitions for Market towns and local service centres to become more self-contained, supported by the necessary sustainable infrastructure and employment to meet local needs.
- 6.25 **Policy 1 (Settlement strategy)** is carried forward from the 2015 Core Strategy and notes the primary focus for development is to be on Principle Settlements (Chippenham, Trowbridge and Salisbury). Melksham, with Bowerhill village, is categorised as a Market Town. The policy identifies Market Towns as places with potential for significant growth, where increases in employment and housing can promote more sustainable communities.
- 6.26 The Plan sets out the provision of 36,740 new homes across Wiltshire during the plan period. **Policy 2 (Delivery strategy)** sets out the phasing of housing requirements as:
- Pre-plan adoption (2020-2024): 8,080;
 - Phase 1 (2024-2031): 10,290; and
 - Phase 2 (2031-2038): 18,370.
- 6.27 **Policy 3 (Reserve sites for housing and broad locations for growth)** identifies Melksham and Chippenham as broad locations for growth, where additional urban extensions will be identified towards the end of the plan period to meet longer-term strategic needs for housing and employment.

6.28 **Policy 17 (Melksham Market Town)** (see Appendix 6.2) sets out how development over the plan period will:

- provide approximately 2,160 homes and 5ha of employment land within Melksham;
- ensure town centre regeneration through continued investment;
- reduce out-commuting;
- deliver sufficient healthcare facilities, schools and transport infrastructure; and
- ensure a town-wide approach to future education provision, with sufficient early years, primary and secondary school places provided to meet the needs of all new housing development.

6.29 **Policy 20 (Land North of the A3102)** (location of proposed development) allocates approximately 285 dwellings and 0.4 ha of land for a 100-place nursery.

TABLE 6.2 DISTRIBUTION OF HOUSING GROWTH FOR THE CHIPPENHAM HMA

SETTLEMENT	HOUSING GROWTH (2020 - 2038) (DWELLINGS)	COMPLETIONS AND COMMITMENTS (1 ST APRIL 2020 – 31 ST MARCH 2022)*	RESIDUAL AT 1 ST APRIL 2022**
Chippenham	5,850	3,759	2,090
Calne	1,230	635	600
Corsham	360	105	260
Devizes	980	936	40
Malmesbury	600	611	0
Melksham	2,160	1,036	1,120
Rural Area	2,460	1,732	730

*includes major permissions post 1st April 2022, up to 31st May 2023

**Residual rounded to the nearest 10 dwellings

Source: Wiltshire Local Plan Review (pre-submission draft 2020-2038 - Regulation 19) (Wiltshire Council, 2023)

Wiltshire Infrastructure Delivery Plan 3

6.30 The Infrastructure Delivery Plan (IDP) supports the Wiltshire Core Strategy.

6.31 The plan notes that the 42,000 houses planned to be delivered in the Wiltshire Core Strategy will equate to 12,500 primary and 8,400 secondary school places. The Plan reports 238 schools in the Wiltshire Unitary Authority (UA) and uses pupil product figures to estimate the number of new nursery, primary, and secondary aged children will be expected from new housing development:

- 0.04 per dwelling for 0-2 year olds (4 per 100 dwellings);
- 0.09 per dwelling for 3-4 year olds (9 per 100 dwellings);
- 0.31 per dwelling for primary aged pupils (31 per 100 dwellings); and
- 0.22 per dwelling for secondary aged pupils (22 per 100 dwellings).

6.32 The Plan sets out the available transport, community facility, health and social care, and open space provision within Wiltshire and notes how they align to the objectives of the Core Strategy.

Review and Update of the Infrastructure Delivery Plan

6.33 The Review and Update of the Infrastructure Delivery Plan forms part of the evidence base for the Wiltshire Local Plan Review.

- 6.34 The plan notes there are a total of 235 schools in the Wiltshire UA (as of January 2023) and references Wiltshire Council's draft School Places Strategy 2023-2027 to estimate the number of nursery, primary and secondary aged children that should be provided for from new housing development:
- Early Years – 12 per 100 houses over 1 bedroom;
 - Primary – 31 per 100 houses over 1 bedroom; and
 - Secondary – 22 per 100 houses over 1 bedroom.
- 6.35 Taking into account the preferred size of new primary and secondary schools, the plan calculates a requirement for future school places to accommodate planned future growth. This includes a 2FE primary school (incorporating a 60-place nursery) and another 100-place nursery in Melksham. Policy 19 (Land off Bath Road, Melksham) of the Wiltshire Local Plan Review also secures 2ha of land to enable Melksham Oak secondary school to be expanded.

West Wiltshire Local Development Framework: Leisure and Recreation Development Plan Document (Saved Policies)

- 6.36 The West Wiltshire Local Development Framework Leisure and Recreation Development Plan Document (Saved Policies) provides the spatial planning framework for the immediate future provision of leisure and recreation open space in West Wiltshire.
- 6.37 The Document sets out the proposed open space quality standards for West Wiltshire, which remain a saved policy under the existing Wiltshire Core Strategy and are set out in Table 6.3.

TABLE 6.3 PROPOSED QUANTITY STANDARDS – WEST WILTSHIRE DPD (SAVED POLICIES)

FORM OF PROVISION	QUANTITY (SQ M PER PERSON)
Allotments	1.5
Bowling greens	0.2
Equipped play	0.5
Multi-functional greenspaces	12
Sports pitches and courts	10
Teenage facilities	0.25
Urban parks	1.3
Sports halls	0.08
Swimming pools	0.05

Joint Melksham Neighbourhood Plan 2 2020-2038 (Made 2025)

- 6.38 This plan aims to provide an update to 'the first plan'³ and ensure that growth and opportunities in Melksham are balanced and support community aims. Residents voted in favour of its adoption in the July 2025 Referendum. And it was subsequently "made",
- 6.39 **Policy 6 (Housing in defined settlements)** notes that proposals for sustainable housing development within the settlements of the Neighbourhood Area will be supported where they align with Wiltshire Local Plan Policy 1. The policy notes new housing will be supported where it can be demonstrated how housing types and tenures are able to respond to local needs.

³ Joint Melksham Neighbourhood Plan 2020 – 2026 (2021)

- 6.40 The Plan notes that growth at Melksham has exceeded the Core Strategy requirement up to 2026. The Local Plan Review (after deducting homes already built or in the pipeline with approval) sets a remaining growth target of an additional 1,170 homes to be delivered by 2038. Alongside allocations set out in the Local Plan (for around 845 dwellings), it is suggested that land for a further 200 dwellings at Melksham should be delivered through allocations made by the review of the Neighbourhood Plan.
- 6.41 **Policy 8 (Infrastructure phasing and priorities)** sets out to ensure that housing development proposals consider, assess, and address necessary infrastructure requirements, helping to meet the needs of the community.

CONSULTATION

- 6.42 No consultation related to potential socioeconomic impacts has been undertaken as part of this assessment.

ASSESSMENT METHODOLOGY

Predicting effects

- 6.43 There are no formal measures of assessing impact significance for socio-economic receptors. There is no standard guidance that specifies the technical approach to the assessment of socio-economic effect. In the absence of standard industry guidance, Glasson et al (2018) serves as a useful resource to assist in setting appropriate parameters for the assessment of socio-economic effects. Glasson et al (2018) recommend the inclusion of the following impacts:
- **Direct economic;**
 - **Indirect/induced economic;**
 - **Demographic;**
 - **Housing;**
 - **Other local services;**
 - Socio-cultural; and
 - Distributional.
- 6.44 Since the source material was published, approaches to assessing human health effects have evolved to cover the final two impacts, therefore the impacts set out in bold above are taken forward for further consideration in the context of socio economics.
- 6.45 The assessment has been carried out in line with other (non-binding) best practice EIA guidance. Where the available guidance does not specify a technical approach to assessing socio-economic effects, this assessment is informed by the professional judgment of the chapter authors.
- 6.46 The socio-economic receptors to be scoped “in” to this assessment are set out in Table 6.4 and the socio-economic receptors to be scoped “out” of this assessment are set out in Table 6.5.

TABLE 6.4 SOCIO-ECONOMIC RECEPTORS AND IMPACTS TO BE SCOPED IN

RECEPTOR	POTENTIAL IMPACT
Construction phase	
Employment	• Direct, indirect, and induced employment impacts and associated wages in the supply chain supported by construction activities.

Operation phase	
Population	- Increased size of the populations of the study areas. - Change in demography of the populations of the study areas.
Housing	- The delivery of new housing assessed against identified housing needs. - The provision of new affordable housing assessed against identified affordable housing needs.
Education	Potential impact on the demand on educational infrastructure arising from the additional population, and the delivery of a 100 place nursery.
Healthcare	Potential impacts on the demand for healthcare infrastructure arising from the additional population.
Community services	Impacts on the demand for other community services.
Open space	Potential impact on the provision of open space and outdoor recreation.

TABLE 6.5 SOCIO-ECONOMIC RECEPTORS AND IMPACTS TO BE SCOPED OUT

RECEPTOR	POTENTIAL IMPACT
Operation phase	
Employment	• Employment accommodated in the provision of new nursery: the Proposed Development includes provision of land to accommodate a new nursery. The estimated quantum of employment that could potentially be supported by a new nursery is assumed to be negligible when assessed against baseline conditions. For the purposes of preparing a proportionate assessment, this impact is scoped out. • Employment accommodated through home-based businesses: the Proposed Development includes delivery of residential units, which are likely to indirectly support home-based businesses. The estimated quantum of employment that could potentially be supported by on-site home-based businesses is assumed to be negligible. For the purposes of preparing a proportionate assessment, this impact is scoped out. • Wages generated through employment: since potential wage impacts are derived directly from employment estimates (scoped out above), this impact is scoped out. • Loss of employment on agricultural land: the Proposed Development could potentially lead to the loss of economic activity on the subject site's existing agricultural land. The employment supported by agricultural land of the quantum and quality of the subject site is assumed to be negligible. For the purposes of preparing a proportionate assessment, this impact is scoped out.

Study area

6.47 The site measures approximately 14.95 ha. It is located to the northeast of Melksham town centre.

6.48 The site itself comprises several fields of grazed modified grassland. DEFRA's online database suggests that the subject site is Grade 3b agricultural land. Consequently, it is not considered to be best and most versatile agricultural land.

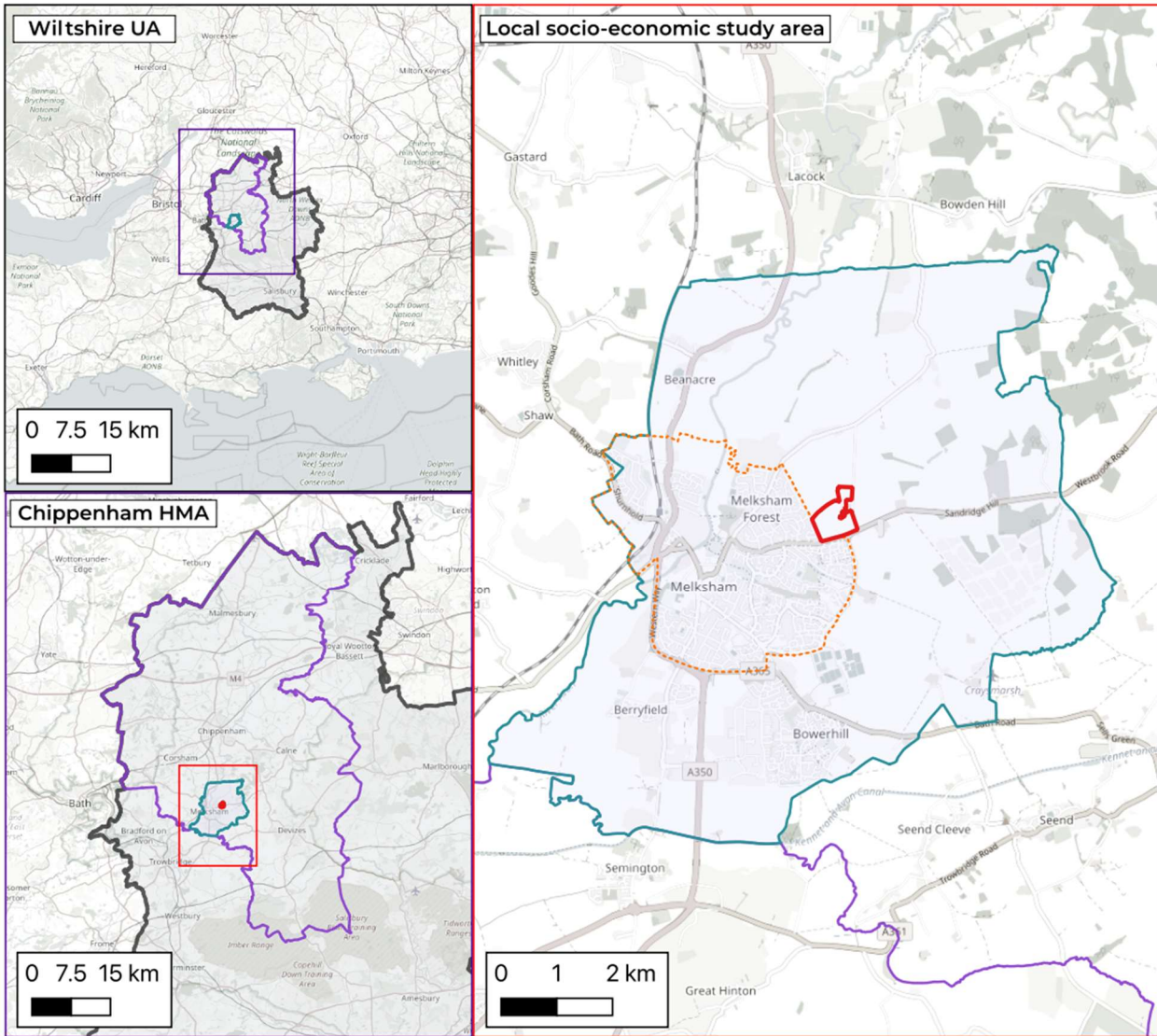
6.49 The following study areas have been adopted within this assessment (set out in Figure 6.1):

- **Local socio-economic study area:** this includes the lower super output areas (LSOAs) that constitute Melksham Parish, and the immediate surrounding LSOAs within Melksham Without Parish, excluding Whitley and Shaw⁴. The Wiltshire Local Plan Review notes that Melksham and Bowerhill are recognised to have a functional relationship, therefore Bowerhill has been included within the local study area;
- **Chippenham Housing Market Area (HMA):** this is identified as the wider impact area for the study and reflects the HMA as set out in the Wiltshire Local Plan Review (2023). Considering the scale and nature of the Proposed Development, the Wiltshire UA area covers areas with little to no socio-economic linkages with Melksham and the site, and is therefore considered too large to be the wider impact area for this assessment; and
- **Wiltshire UA area:** this will be considered where data at a lower level is unavailable.

6.50 Policies which have been considered in this assessment are relevant to different geographies. Further detail on these geographies have been set out in Appendix 6.2.

⁴ Whitley and Shaw is identified as a large village within the Wiltshire Local Plan Review (2023)

FIGURE 6.1 SOCIO-ECONOMIC STUDY AREAS



QGIS Development Team, 2024. QGIS Geographic Information System. Open Source Geogspatial Foundation Project. Map data from OpenStreetMap. Office for National Statistics licensed under the Open Government License v3.0. Contains OS data © Crown copyright and database right 2024.

Legend Site Boundary Melksham Parish Local socio-economic study area Chippenham HMA Wiltshire Unitary Authority	Project:	Land at New Road Farm, Melksham
	Title:	Socio-economics study areas
	Date	February 2024
	Scale (top left)	1 : 4,500,000
	Scale (lower left)	1 : 1,085,500
	Scale (right)	1 : 102,000

Source: HJA

Assessment criteria

- 6.51 A common approach used in the EIA process is the application of multi-criteria analysis. Common criteria used to evaluate significance include the magnitude of the predicted impact and the sensitivity of the receiving environment.
- 6.52 **Magnitude** considers the characteristics of the change which are likely to affect the target receptor(s) as a result of the Proposed Development – including the timing, scale, and duration of the impact. There is no specific guidance on the approach to assessing the magnitude of socio-economic impacts.
- 6.53 The magnitude of impacts can be assessed on the basis of a number of factors – scale, spatial extent, duration, and frequency. Within the topic of socioeconomics, these factors are considered as follows:
- **Scale:** the expected degree of change relative to baseline conditions;
 - **Spatial extent:** geographical area over which the impact may occur;
 - **Duration:** the time over which a potential impact occurs. A potential impact may be described as short, medium or long-term, and permanent or temporary; and
 - **Frequency:** the number of times an impact occurs across the relevant phase/lifetime of a project. Impacts can be assessed as either intermittent or continuous.
- 6.54 Magnitude of impact, based on the change that the Proposed Development would have upon the receptor, is considered within the range of high, medium, low, or negligible. The criteria for assessing magnitude in this assessment are outlined in Table 6.6. Where the level of scale, spatial extent, duration, and frequency differs, the magnitude of impact is assessed on balance using professional judgement.

TABLE 6.6 CRITERIA FOR ASSESSING MAGNITUDE OF IMPACT

MAGNITUDE	DESCRIPTION
High	• Scale: major change of socio-economic conditions compared to the baseline. • Spatial extent: impact occurs at a national geography. • Duration: impact is of long term duration (more than five years). • Frequency: impact is continuous.
Medium	• Scale: moderate change of socio-economic conditions compared to the baseline. • Spatial extent: impact occurs at a regional geography. • Duration: impact is of medium term duration (between one and five years). • Frequency: impact is continuous, or frequent intermittency.
Low	• Scale: minor change of socio-economic conditions compared to the baseline. • Spatial extent: impact occurs at a local geography. • Duration: impact is of short term duration (under one year). • Frequency: impact is intermittent.
Negligible	• Scale: very minor change of socio-economic conditions compared to the baseline. • Spatial extent: impact occurs at a neighbourhood geography. • Duration: impact is of very short term duration (under one month).

MAGNITUDE	DESCRIPTION
	Frequency: infrequent intermittency.

6.55 **Sensitivity** is the importance of the receptor and its responsiveness to change, including its capacity to accommodate the impacts the Proposed Development may bring about.

6.56 The sensitivity of receptors can be assessed on the basis of a number of factors vulnerability/tolerance, recoverability, and value/importance, as follows:

- **Vulnerability/tolerance:** the degree to which a receptor can accommodate a temporary or permanent change;
- **Recoverability:** the ability of a receptor to be able to return to a state close to that which existed before an activity or event occurred; and
- **Value/importance:** the importance of the receptor in terms of social/community and/or economic value. In this chapter the receptor's policy importance is used as the primary indicator of value.

6.57 The criteria for defining sensitivity in this assessment are outlined in Table 6.7. Where the level of vulnerability, recoverability, and value differs, the receptor sensitivity is assessed on balance using professional judgement.

TABLE 6.7 CRITERIA FOR ASSESSING SENSITIVITY OF RECEPTOR

RECEPTOR SENSITIVITY	DESCRIPTION
High	High vulnerability/low tolerance – the receptor is identified as being highly responsive to changes in conditions, and the receptor is highly unlikely to be able to accommodate any of the impacts of the proposed development. Low recoverability – the receptor is highly unlikely to return to a state comparable with the conditions that existed before delivery of the proposed development. High value – the receptor is identified as a policy priority, and/or baseline conditions indicate high importance.
Medium	Medium vulnerability/tolerance – the receptor is identified as being slightly responsive to changes in conditions, and the receptor may be able to accommodate some impacts of the proposed development, but is unlikely to be able to fully accommodate all impacts; and/or Medium recoverability – the receptor is unlikely to return to the same conditions that existed before delivery of the proposed development; and/or Medium value – the receptor is identified as a medium policy priority, and/or baseline conditions indicate medium importance.
Low	Low vulnerability/high tolerance – the receptor is identified as being unresponsive to changes in conditions, and the receptor is highly likely to be able to accommodate most impacts of the proposed development, and may be able to fully accommodate all impacts; and/or

RECEPTOR SENSITIVITY	DESCRIPTION
	High recoverability – The receptor is likely to return to the same (or very similar) conditions that existed before delivery of the proposed development; and/or Low value – the receptor is not identified as a policy priority, and/or baseline conditions do not indicate importance.
Negligible	There is evidence of very little or no vulnerability/complete tolerance to the proposed development; and/or The receptor is deemed not important at any policy level.

6.58 The significance of effect upon socio-economic receptors would be determined by taking into account the sensitivity of the receptor and the magnitude of the potential impact. Significance is considered within the range of major, moderate, minor, or negligible.

6.59 The criteria for determining significance of effects are set out in Table 6.8.

TABLE 6.8 CRITERIA FOR ASSESSING SIGNIFICANCE OF EFFECT

RECEPTOR SENSITIVITY	MAGNITUDE OF IMPACT			
	High	Medium	Low	Negligible
High	Major	Major	Moderate	Minor
Medium	Major	Moderate	Minor	Negligible
Low	Moderate	Minor	Minor	Negligible
Negligible	Minor	Negligible	Negligible	Negligible

6.60 As a guide, effects determined to be moderate or major are considered to be significant in EIA terms. However, this is tested with professional judgement where other factors such as timescales and reversibility are taken into consideration.

Assessment limitations

6.61 Reporting of baseline conditions is constrained by the availability of published data. Statistical boundaries, reporting periods, publishing dates, methodologies, and definitions can vary between sources. Whilst it is not possible to standardise data for the purposes of reporting socio-economic baseline conditions, every effort has been made by the author to accommodate unavoidable variations and provide context and explanation where it has been necessary to make such accommodations.

BASELINE CONDITIONS

Baseline information

6.62 The socio-economic baseline environment has been described for the local socio-economic study area and Chippenham HMA (where data is available at those levels). This includes data and

information for population, labour market, housing, employment, community services (including education and healthcare) – as summarised in Table 6.9.

- 6.63 Where data is not available utilising 2021 LSOA boundaries, 2011 LSOA boundaries are utilised instead – further details are set out in Appendix 6.1.

TABLE 6.9 SUMMARY OF BASELINE SOURCES

SOURCE	DATASET/DOCUMENT	REFERENCE
Census 2021	TS001 – Number of usual residents in households and communal establishments.	(ONS, 2021)
Census 2011	KS101EW – Usual resident population	(ONS, 2011)
Business Register and Employment Survey (BRES)	BRES: Open access	(ONS, 2024a)
Ministry of Housing, Communities & Local Government (MHCLG), 2019	English indices of deprivation 2019	(MHCLG, 2019)
Household projections for England	2018-based household projections for local authorities and higher administrative areas within England	(ONS, 2024d)
NHS Digital	General Practice Workforce	(NHS Digital, 2024)
Department for Education	School capacity 2022/23 academic year	(Department for Education, 2024)
Wiltshire Council	Wiltshire Core Strategy	(Wiltshire Council, 2015)
Wiltshire Council	Wiltshire Local Plan Review (Reg19)	(Wiltshire Council, 2023)

Melksham profile

- 6.64 Melksham is a market town situated in the western part of Wiltshire, approximately 16 km from Bath, 10 km from Trowbridge, and about 8 km from Chippenham.
- 6.65 The town has a population of approximately 24,000 residents, making it the fifth largest town in Wiltshire based on population. Its economy is characterised by a mix of traditional and modern industries, with manufacturing, retail, and service sectors particularly important in terms of employment. Melksham also serves as a commuter town for nearby cities such as Bath and Bristol.
- 6.66 Melksham railway station is located on the TransWilts branch of the Wessex Main Line, with services roughly every two hours in each direction on weekdays. The town is on the north–south A350 primary route from the M4 motorway (Junction 17, near Chippenham) to Poole on the south coast. In February 2020, the UK government gave approval for a £125m re-routing of the A350 to the east of Melksham – the project remains at planning stage.
- 6.67 As a market town, Melksham offers a range of community facilities which service its residents and those of its hinterland. These include parks, leisure centres, and sports clubs, which provide opportunities for recreation. Melksham’s retail offer includes supermarkets, local shops, a post office, and a farmers market. Melksham has a police station and a fire station. The town’s cultural life is supported by venues such as the Melksham Assembly Hall, which hosts events and performances. Melksham’s leisure offer include pubs, cafés and restaurants.

Employment

- 6.68 In 2022, total employment⁵ in the local socio-economic study area was 10,000 (ONS, 2024a). Between 2017 and 2022, ONS data indicates that total employment did not change in the local socio-economic study area⁶, which differs to Chippenham HMA and Wiltshire UA which experienced total employment growth over the same period. In 2022, the total employment in the Chippenham HMA was 77,000. Between 2017 and 2022, total employment in this wider impact area increased by 1,000 at an annual average growth rate of 0.3%.
- 6.69 In the local socio-economic study area, 800 people were employed in the Construction sector in 2022. Between 2017 and 2022, Construction sector employment increased by 200 at an annual average growth rate of 5.9%, which is higher than the annual average growth rate for the sector in the Chippenham HMA (3.7%).
- 6.70 BRES data shows that in the local socio-economic study area in 2022, within the Construction sector, 200 people were employed in the construction of buildings (Standard Industrial Classification (SIC) 41). Between 2017 and 2022, employment in the construction of buildings increased by 75 persons.

Population

- 6.71 According to Census 2021 data, the average household size in Wiltshire is 2.32 persons per dwelling.
- 6.72 In 2021, there were 23,800 residents in the local socio-economic impact area (ONS, 2021) an increase from 20,500 residents in the 2011 Census. Over this period the average annual growth rate was 1.5%, which is higher than the equivalent rates in the Chippenham HMA (0.6%) and in the Wiltshire UA (0.8%).
- 6.73 The resident population in the Chippenham HMA was 176,200 in 2021 (ONS, 2021) up from 166,000 in 2011 (ONS, 2011). Table 6.10 sets out the number of residents in each study area and in England.

TABLE 6.10 RESIDENT POPULATIONS ACROSS STUDY AREAS AND ENGLAND

AREA	CENSUS 2011	CENSUS 2021	CHANGE 2011-2021	ANNUAL AVERAGE GROWTH RATE (2011 - 2021)
Local socio-economic study area	20,500	23,800	3,300	+1.5%
Chippenham HMA	166,000	176,200	10,300	+0.6%
Wiltshire UA	471,000	510,300	39,400	+0.8%
England				+0.6%

Source: Census 2011: KS101EW - Usual resident population (ONS, 2011) and Census 2021: TS001 - Number of usual residents in households and communal establishments (ONS, 2021).

- 6.74 The Index of Multiple Deprivation (IMD) sets out the relative levels of deprivation for the 32,844 LSOAs across England in 2019, taking into account seven distinct domains of deprivation which are

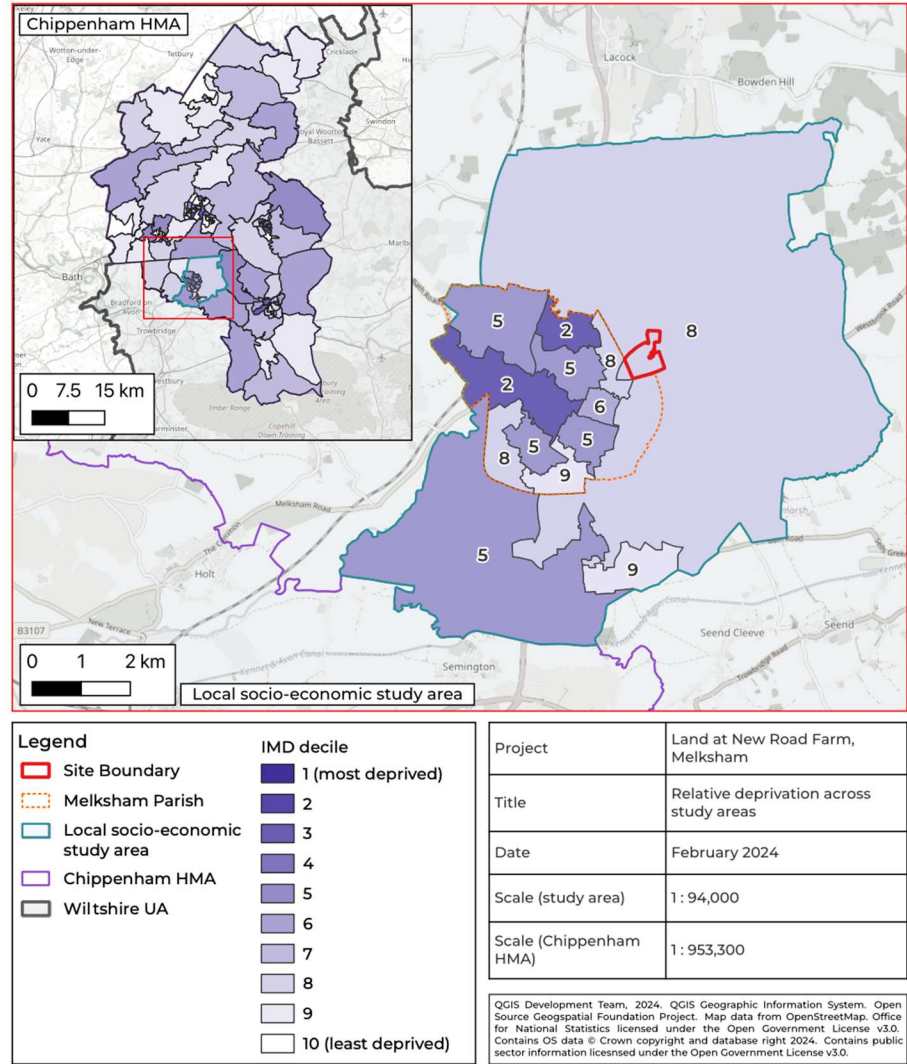
5 Employment includes the number of working owners (not paid via Pay as You Earn (PAYE)) to the number of full and part time employees. It is a measure of persons not full-time equivalents.

6 ONS rounding methods may disguise small levels of change.

income, employment, health deprivation and disability, education and skills training, crime, barriers to housing and services, and living environment.

- 6.75 The IMD ranks all LSOAs as well as dividing them into 10 deciles, in which areas that fall within decile 1 are the most deprived 10% LSOAs nationally and the areas falling in decile 10 are within the least deprived 10% of LSOAs nationally.
- 6.76 Of the 13 LSOAs⁷ in the local socio-economics study area, two are ranked in the second IMD decile and five are ranked in the fifth IMD decile, indicating there are areas with relatively high levels of deprivation. The two LSOAs ranked in the second decile are located within the Melksham Town Parish Boundary (MHCLG, 2019).
- 6.77 Of the 103 LSOAs⁸ in the Chippenham HMA, 28 fall in or above the fifth decile of relative deprivation, with the remaining 73% of LSOAs falling in the sixth to tenth decile.
- 6.78 Figure 6.2 shows the relative deprivation across socio-economic study areas using data from the 2019 IMD. LSOAs within the local socio-economic study area are labelled with their IMD decile.

FIGURE 6.2 RELATIVE DEPRIVATION ACROSS SOCIO-ECONOMIC STUDY AREAS (BASED OFF 2019 IMD)



Source: HJA analysis of IMD data (MHCLG, 2019)

7 Note this is based on 2011 LSOA boundaries.

8 Note this is based on 2011 LSOA boundaries.

School capacity

- 6.79 The Proposed Development is located within the primary school catchment area for River Mead School and The Manor Church of England School. In addition, Aloeric Primary School, Forest and Sandridge Church of England Primary School, and the new school planned at Pathfinder Way are within the 2 miles safe walking distance from the application site.
- 6.80 The Proposed Development is located within the secondary school catchment area for Melksham Oak Community School Secondary, which is just over 3 km to the south of the site.
- 6.81 The capacity and unfilled places of schools in the local socio-economic study area are set out in Table 6.11.

TABLE 6.11 SCHOOL CAPACITY IN LOCAL SOCIO-ECONOMIC STUDY AREA FOR THE ACADEMIC YEAR 2022-2023

SCHOOL	SCHOOL PHASE	SCHOOL CAPACITY	PUPILS ON ROLL	UNFILLED PLACES
In-catchment				
River Mead School	Primary	210	228	0
The Manor CoE Primary School	Primary	210	133	77
Melksham Oak Community School	Secondary	1,500	1,055	445
Within safe walking distance				
Forest and Sandridge CoE Primary School	Primary	525	441	84
Aloeric Primary School	Primary	420	347	73

Source: Education Landscape Review – Land off Sandridge Common, Melksham, Wiltshire (EFM, 2025)

Healthcare

- 6.82 Healthcare is divided into primary care, secondary care, and tertiary care. Primary care is often the first point of contact for people in need of healthcare, and may be provided by professionals such as GPs, dentists and pharmacists. Secondary care is sometimes referred to as 'hospital and community care', whilst Tertiary care typically refers to highly specialised treatment and mental health services.
- 6.83 The Bath and North East Somerset, Swindon and Wiltshire Integrated Care Board (ICB) covers the Wiltshire area.
- 6.84 There are two GP practices which fall within the local socio-economics study area and in the wider Chippenham HMA:
- Giffords Primary Care Centre (Spa Road); and
 - Spa Medical Centre (Snowberry Lane).
- 6.85 Table 6.12 sets out the number of registered patients and full-time equivalent⁹ (FTE) GPs at the Practices and in England.
- 6.86 As of February 2024, there were 8.7 FTE GPs at Giffords Primary Care Centre, which is equivalent to 60.5 FTE GPs per 100,000 patients at the Centre, according to NHS Digital Statistics. The number of FTE GPs per 100,000 patients at this Practice is above the average across the local NHS ICB (60.2) and England (57.2).

⁹ Full-time equivalent (FTE) indicates the work-time of an employed person in a way that makes jobs comparable (e.g. an FTE of 1.0 is equivalent to a full-time worker), while an FTE of 0.5 signals half a full-time worker.

6.87 There were 7.8 FTE GPs at the Spa Medical Centre as of February 2024, equivalent to 53.0 FTE GPs per 100,000 patients. This is below the average for the local NHS ICB (60.2) and England (57.2).

TABLE 6.12 LOCAL HEALTHCARE FACILITY DETAILS AND WIDER GEOGRAPHY COMPARISONS

FACILITY	REGISTERED PATIENTS	FTE GPS	GPS FTES PER 100,000 PATIENTS
Giffords Primary Care Centre	14,488	8.7	60.5
Spa Medical Centre	14,556	7.8	53.0
NHS Bath and North East Somerset, Swindon and Wiltshire ICB	1,003,965	605.3	60.2
England	63,201,008	36,160.6	57.2

Source: HJA analysis of NHS Digital data (2024)

6.88 The Melksham Community Hospital sits within the local socio-economic study area, less than 3 km from the site. Melksham Community Child & Adolescent Mental Health Service (located at the community hospital) provides a specialist service that helps children and young people who are struggling with a range of different mental health issues. The hospital also provides radiography, podiatry, physiotherapy, wheelchair services, and a number of other outpatient services. A team of community nurses are also based there. This facility does not offer inpatient care and does not offer a minor injuries unit. For other services, patients travel to medical facilities outside Melksham.

6.89 Melksham has three dental practices, four pharmacies, and three opticians, as set out in Table 6.13.

TABLE 6.13 MELKSHAM HEALTH FACILITIES

HEALTH FACILITY	DESCRIPTION
Dental practices	Melksham Dental Practice, Market Place Dental Clinic, and Regency Dental Practice: offering general and cosmetic dental services.
Pharmacies	Melksham Pharmacy, Gompels Pharmacy, Boots Pharmacy and Lloyds Pharmacy: branches located in the town centre, providing prescriptions and health products.
Opticians	Haine & Smith, Nixon & Shaw, and Specsavers: offering eye tests, glasses, and contact lenses.

Community facilities

6.90 Melksham town centre is located approximately 1.8km west of the site. As a market town, Melksham is an important service centre for its own residents and those of its hinterland. These are listed in Table 6.14.

TABLE 6.14 MELKSHAM COMMUNITY FACILITIES

FACILITY	DESCRIPTION
Childcare	
Nurseries	Rivermead School and Nursery, Little Robins Nursery, Queensway Chapel Nursery, and ABC Day Nursery.
Leisure and recreation	
Leisure centres and gyms	Melksham Community Campus
Fitness centres ("gyms")	Snap Fitness, CrossFit Civitas
Sports clubs	Melksham Town Football Club, Melksham Rugby Club, Wiltshire School of Gymnastics, Melksham Parkrun.
Community venues	Forest Community Centre, Melksham Riverside Centre, That Meeting Space.
Play Areas	Melksham Skate Park, Awdry Avenue Play Area, Methuen Avenue Play Area, Lewington Close Play Area, Riverside Drive Play Area, Dunch Lane Play Area, Hazelwood Road Play Area, Cornflower Way Playing Field, Speedwell Close Play Area, Primrose Drive Play Area, The Woody Play Park, King George V Playing Fields and Play Areas.
Arts and entertainment	
Venues	Melksham Assembly Hall: live music and arts.
Museums	The Well House Collection (Museum of Melksham)
Religious	
Churches	St. Michael and All Angels Church (Anglican), St Andrew's Church (Anglican), St Anthony of Padua (Catholic), Melksham Baptist Church (Baptist), Melksham United Church (Methodist), Queensway Chapel (non-denominational).
Retail	
Supermarkets	Asda, Waitrose, Sainsbury's, Lidl, Aldi, Co-op, Iceland.
High street	Varied convenience and comparison offer.
Public services	
Libraries	Melksham Library
Post offices	Melksham Post Office
Emergency services	Wiltshire Police (Division HQ) based in Melksham, Dorset & Wiltshire Fire & Rescue Service (Semington Road), Wiltshire Air Ambulance based south of Melksham.
Hospitality	
Food and drink	Multiple pubs, cafés and restaurants.
Accommodation	Travelodge Melksham, The King's Arms, Beechfield House, plus multiple B&Bs.
Transport	
Rail	Melksham Railway Station: serving the town on the TransWilts Line.
Bus	Faresaver Buses: operating various routes connecting Melksham to nearby towns and cities.

Open Space

6.91 The current open space standards according to the West Wiltshire Local Development Framework: Leisure and Recreation Development Plan Document (Saved Policies) are listed in Table 6.3.

6.92 The Wiltshire Open Space Assessment Update (2023) outlines the existing provision and supply of open space within the Melksham and Melksham Without Parishes, as shown in Table 6.15.

TABLE 6.15 EXISTING PROVISION AND SUPPLY OF OPEN SPACE IN MELKSHAM AND MELKSHAM WITHOUT

OPEN SPACE TYPE	EXISTING PROVISION (HA)	EXISTING PROVISION (HA/1000 POPULATION)	EXISTING SUPPLY (HA)
Allotments	3.97	0.17	-1.99
Amenity green space	21.18	0.89	-0.27
Park and recreation ground (combined)	27.20	1.14	0.99
Park and recreation ground	26.14	1.1	-
Outdoor sport (fixed)	1.07	0.04	-
Outdoor sport (private)	16.99	0.71	-
Play space (children)	1.53	0.06	-4.43
Play space (youth)	0.75	0.03	-6.40
Accessible natural green space	27.84	1.17	-
Natural green space (limited access)	0.00	0.00	-
Churchyard and cemeteries	3.11	0.13	-
Education	22.82	0.96	-

6.93 From the tables above, Melksham has a good level of access to park and recreation ground space and has almost the quantity standard of amenity green space provision. Access to allotments and play space is limited.

Future baseline

6.94 The future baseline is unlikely to differ significantly from the existing socio-economic baseline, other than gradual increase in, and an aging, population. ONS population projection data (2020) is unavailable at LSOA level and so future population is set out for Wiltshire. The population of Wiltshire in 2040 is estimated to be approximately 547,900, growing at an average annual rate of 0.4% between 2020 and 2040.

6.95 2018-based household projections are available from the ONS at local authority and higher administrative area levels. Over the Local plan period (2020-2038) it is estimated that Wiltshire will increase by 26,500 households, which equates to approximately 1,500 households per annum (ONS, 2024d).

INHERENT AND STANDARD MITIGATION

Construction phase

6.96 There is no inherent and standard mitigation relevant to socio-economics during the construction phase.

Operation phase

- 6.97 The Proposed Development includes a new 100 place nursery (0.4ha) as required by Policy 20 of the Wiltshire Local Plan Review. As well as mitigating effects associated with an increase in Melksham's early years pupil population, the new nursery would provide additional capacity to meet early years demand in the wider Melksham Community Area.
- 6.98 Other **education** and **healthcare** infrastructure requirements arising as a result of the resident population associated with the Proposed Development would be mitigated via developer contribution. The developer contributions associated with the Proposed Development are considered within actionable mitigation.
- 6.99 The Proposed Development includes provision of open space. This would increase the provision of open space in Melksham.

ASSESSMENT OF ENVIRONMENTAL IMPACTS

Construction phase

- 6.100 Construction of new dwellings and supporting infrastructure and preparatory works, would support direct, indirect, and induced employment impacts in the construction industry and its supply chain. This also presents an opportunity to deliver an investment in skills and employability during the construction phase as a result of capital investment stimulating labour market conditions.

Employment

Magnitude of impact

- 6.101 The provision of construction jobs can benefit a local community. These jobs support incomes, reduce unemployment rates, and enhance overall economic conditions. Construction jobs also provide opportunities to deliver an investment in skills and employability, including work placements, apprenticeships and other activities. The presence of active construction projects often stimulates local businesses, such as suppliers and service providers, creating a multiplier effect that bolsters the economy. The impact is therefore considered to be beneficial.
- 6.102 Construction phase impacts are estimated based on the overall scale of development as measured by total construction costs. The construction cost of the proposed development (295 dwellings and associated infrastructure) has been estimated as £42–£45 million¹⁰.
- 6.103 Employment during the construction phase of development is quantified in terms of 'person-years' given that construction employment can be temporary in nature, with a range of trades and activities on site at any given time.
- **Gross direct impacts¹¹:** the anticipated capital investment to deliver the Proposed Development would support an estimated 510–560 person-years of employment within the construction sector over the entire 7-year construction period. This level of direct construction sector employment would support wage generation of between £22 m – £24 m over the entire construction phase.

This equates to an estimated 70–80 person-years of employment per annum within the construction sector, which would support wage generation of approximately £3.1 m – £3.4m annually; and
 - **Net Additional Local Impacts:** net additional local impact is a measure of the total impact likely to be retained in the local area. To convert the above gross direct impacts to net additional local

¹⁰ The construction cost figure is based on HJA estimates.

¹¹ An estimate of total project impact

impacts requires adjustments for leakage¹², deadweight¹³, displacement/substitution¹⁴ and multiplier effects¹⁵. Net local impacts are assessed based on the Chippenham HMA area.

The assessed net local impacts of the Proposed Development would support approximately 400–430 person-years of additional employment to local residents, and wages of £17 m – £18 m over the 7-year construction period.

This equates to an estimated 60 person-years per annum of additional employment within the construction sector to local residents, which would support wages of approximately £2.5 m annually.

- 6.104 The construction sector supported 6,000 jobs in the Chippenham HMA, in 2022. The estimated average annual gross direct employment would accommodate around 1% of the Chippenham HMA's construction sector employment. Between 2016 and 2022, the annual average growth rate of construction jobs was 3.7%.
- 6.105 The construction sector phase provides an opportunity to deliver an investment in skills and employability, including work placements, apprenticeships and other activities. This would enhance employment impacts.
- 6.106 Considering the associated impact on the quantity, quality and wages of construction sector employment, the **scale** of this impact is assessed as low.
- 6.107 It is likely that many construction activities would be contracted to firms with workers that live within a commutable distance of the site. The geographical scope of construction employment would likely be wider than Chippenham HMA. The **spatial extent** is considered to be sub-regional.
- 6.108 Whilst it is over 5 years, the 7-year construction phase can be considered medium-term **duration** given that many construction activities would not be required for the entire construction phase (see intermittency below). For the same reason, the impact is considered to be temporary.
- 6.109 Employment during the construction phase of development is quantified in terms of 'person-years' given that construction employment on a given scheme can be temporary in nature – the impact **frequency** is therefore assessed as intermittent.
- 6.110 Overall, the scale of the impact is assessed as low, the spatial extent is considered to be sub-regional, the duration is anticipated to be medium-term (temporary), and the frequency is expected to be intermittent. Therefore, the **magnitude** of potential impacts on construction sector employment, wages, and labour market conditions is assessed as **low (beneficial)**.

Sensitivity of the receptor

- 6.111 Employment in the construction sector within both the local socio-economic study and the Chippenham HMA area has increased over the period 2017–2022. This could be a result of increased capital investment in the sector leading to job growth, or it could be a result of newly trained or transitioning workers entering the workforce. The construction sector's performance over recent years suggest it should be in a position to respond to increased demand resulting from capital investment. This suggests a low **vulnerability** to change.
- 6.112 Construction employment can be temporary in nature. The workforce is likely to be engaged in construction works associated with other schemes before, during, and after their involvement with the Proposed Development. Once the Proposed Development is delivered, the construction sector workforce supply would not return to its previous state, even if demand (as a result of capital investment) reduces – the relationship between supply and demand in labour markets is non-linear.

¹² The proportion of outputs that benefit those outside the target area.

¹³ Allowing for outcomes that would have taken place without the Proposed Development.

¹⁴ The proportion of outputs accounted for by reduced outputs elsewhere in the target area.

¹⁵ Further economic activity (jobs, expenditure or income) associated with additional local income, local supplier purchases and longer-term effects.

However, some workers may respond to a decline in demand by seeking employment in alternative industries or locations. Therefore, **recoverability** is considered to be medium.

- 6.113 The construction sector contributes to economic output, employment, local development, infrastructure, and innovation. Therefore, providing the workforce to sustain the sector is important. Whilst growth in construction activities is not an explicit policy ambition within Wiltshire, ambitions and allocations for developing houses to support population growth inherently rely upon the construction sector for delivery. Therefore, the **value** of the receptor is assessed as high.
- 6.114 Overall, the vulnerability of the receptor is assessed as low, the recoverability of the receptor is assessed medium, and the value and importance of the receptor is assessed as high. The overall **sensitivity** of the receptor is therefore assessed as **medium**.

Significance of effect

- 6.115 Overall, the magnitude of the impact is assessed as low (beneficial), and the sensitivity of the receptor is assessed as medium. The overall effect is therefore assessed to be of **minor (beneficial)** significance. This is not significant in EIA terms.

Operational phase

Population

- 15.5.31 Delivery of new housing has the potential to increase the size of the population of the local socio-economics study area and Chippenham HMA.

Magnitude of impact

- 6.116 Population growth can have both beneficial and adverse effects, with the overall impact largely contingent on various factors such as infrastructure, resources and planning.
- 6.117 On the one hand, population growth can stimulate economic activity and development. An increase in population can lead to higher demand for goods and services, which can attract businesses, create jobs, and generate revenue for the local authority. Additionally, a growing population can contribute to cultural diversity, enriching an area's social fabric and fostering a vibrant community.
- 6.118 On the other hand, population growth can place a strain on resources and infrastructure where appropriate planning is lacking. Sufficient transportation, healthcare and educational capacity can become more challenging to provide as a population expands.
- 6.119 Effective planning for these factors is a key determinant of whether effects associated with population growth should be considered beneficial or adverse in nature. Investment in infrastructure and sustainable development approaches are necessary to ensure the benefits of population growth are maximised while minimising potentially adverse effects. Collaboration between developers, local authorities, community stakeholders and public bodies is essential to create a well-managed environment that accommodates growth while maintaining a high quality of life for residents.
- 6.120 For the purposes of this assessment, population impacts are considered to be 'neutral' (as opposed to beneficial or adverse). The assessment of education, healthcare and community services impacts elsewhere in this chapter provides further consideration of how beneficial and adverse population changes might impact receiving environments.
- 6.121 Research suggests that younger families with children and young couples are more likely to buy new build homes than middle aged couples and those aged over 60¹⁶. Therefore, in the early stages of the Proposed Development's operation, the estimated demography of the additional population is expected to be higher than the 2021 Census average of 2.32 persons per dwelling. In the long-term, the resident population demographic will eventually reflect broader averages.

¹⁶ Savills (2020)

- 6.122 The Proposed Development is estimated to accommodate approximately 696 residents, when fully occupied (2.36 persons per dwelling).
- 6.123 Demand for housing can arise for a variety of reasons:
- **Demand from population growth:** housing that is occupied as a result of population growth will lead to additional residents living in an area. These new residents will place additional demand on local services such as education and health, above the existing baseline conditions; and
 - **Demand from newly forming households:** a proportion of new housing requirements will be utilised to meet the needs of the changing household formation patterns of the existing population. Over the period 2021–2038¹⁷, ONS household and population projections (2018-based) suggest the average household size in Wiltshire will decrease from 2.37 to 2.26 persons per household. This indicates there will be a need for more housing to accommodate the same number of people. Therefore, housing that is occupied as a result of newly forming households will lead to additional households in an area, but will not increase the resident population of an area i.e. these residents are assumed to already be accounted for within local service capacity.
- 6.124 In order to estimate the 'net additional' population associated with the Proposed Development, it is necessary to consider the likely demand from newly-forming households.
- 6.125 The latest available ONS household and population projections (2018-based) suggest that increasing rates of newly-forming households (and the associated smaller average household size) will account for approximately 44% of the increase in the number of households in Wiltshire over the current Local Plan period (to 2038). It is therefore assumed the remaining 56% of additional households in Wiltshire up to 2038 will be a result of population growth.
- 6.126 Applying these shares to the Proposed Development population provides an estimate of around 392 net additional residents.
- 6.127 Population projections for Wiltshire district suggest the District's population will reach 553,000 in 2038, having grown by 31,700 between 2021–2038. Based on these projections, the net additional population associated with the Proposed Development at full occupancy would accommodate around 1.2% of Wiltshire's projected population growth to 2038.
- 6.128 Overall, the **scale** of the impact is assessed as low.
- 6.129 The impact is anticipated to predominantly affect populations within Melksham and its hinterland. The **spatial extent** is therefore considered to be local.
- 6.130 The estimated population increase is anticipated to have a long-term **duration**, and is considered to be permanent.
- 6.131 The estimated population increase would continue as the Proposed Development continues to be built out and residents continue to occupy units – the **frequency** of the impact is therefore considered to be continuous.
- 6.132 The scale of the impact is assessed as low, the spatial extent is considered to be local, the duration is anticipated to be long-term (permanent), and the frequency is expected to be continuous. Therefore, the **magnitude** of potential impacts on population is assessed as **low (neutral)**.

Sensitivity of the receptor

- 6.133 Given historic and projected population growth in Wiltshire, it is reasonable to assume that population growth has been factored into strategic planning decisions. Dwellings have been delivered in Chippenham HMA in recent years and there are plans for additional housing to meet planned population growth in the future. However, according to IMD data, there are areas within

¹⁷ This period represents the point at which the latest ONS household data (Census 2021) was recorded, and the end of the Regulation 19 Local Plan period.

the local socio-economics study area with relatively high levels of deprivation with respect to barriers to housing and local services. The **vulnerability** of the receptor is therefore assessed as high.

6.134 An increase in population due to relocation is considered to be a permanent impact, therefore the **recoverability** of the receptor is assessed as low.

6.135 Since people are the receptors, the **value** of the receptor is assessed as high.

6.136 The vulnerability of the receptor is assessed as high, the recoverability of the receptor is assessed as low, and the value and importance of the receptor is assessed as high. The overall **sensitivity** of the receptor is therefore assessed as **high**.

Significance of effect

6.137 Overall, the magnitude of the impact is assessed as low (neutral), and the sensitivity of the receptors is assessed as high. The overall effect of the operational phase on population is therefore assessed to be of **moderate (neutral)** significance. This is significant in EIA terms.

Housing

6.138 The delivery of new housing would meet housing need (including affordable housing) as identified in local planning policy.

Magnitude of impact

6.139 Core Policy 2 (Delivery Strategy) of the Wiltshire Core Strategy (2006–2026) sets out that, over the plan period, at least 42,000 homes will be provided within Wiltshire.

6.140 The Policy sets out that 2,240 homes are to be provided over the plan period within Melksham, with a further 130 homes in the 'Melksham Remainder' area i.e. a total of 2,370 within the Melksham Community Area. This equates to around 120 dwellings per annum on average over the Plan period. No specific housing allocations are made in the Core Strategy and the Wiltshire Housing Site Allocations Plan within the Melksham Community Area, but there is recognition that growth over the plan period may consist of a range of sites, in accordance with Core Policies 1 and 2.

6.141 Table 3 of the Wiltshire Council Housing Land Supply Statement (2024) indicates there is a shortfall of 707 units compared to the identified requirement over the period 2006–2026 across Wiltshire as a whole, with a 706-unit shortfall in the subject sites' HMA.

6.142 The Proposed Development equates to around 12% of the estimated housing requirement identified in the adopted Local Plan for Melksham, and around 26% of Melksham's housing requirement having allowed for completions and commitments.

6.143 The annual average housing delivery rate of the Proposed Development (estimated at around 42 dwellings per annum) would meet the current shortfall (to date) in annual housing delivery in the subject site's HMA (33 dwellings per annum), as identified within the latest Wiltshire Council Housing Land Supply Statement (Wiltshire Council, 2023). This shortfall is anticipated to increase by the end of the Plan period.

6.144 The Core Strategy sets out the requirement for 30% of dwellings delivered to be affordable. The Proposed Development meets this requirement and would deliver approximately 118 new affordable homes based on the illustrative layout and mix via a combination of social rented, shared ownership, and first-time buyer units.

6.145 Overall, the **scale** of the impact is assessed as high.

6.146 Although the impact is anticipated to predominantly effect populations within Chippenham HMA, the Proposed Development would also provide housing for people currently living outside the area. The **spatial extent** is therefore considered to be sub-regional.

6.147 The delivery of new housing is anticipated to have a long-term **duration**, and is considered to be permanent.

6.148 The delivery of new housing would continue beyond the adopted Local Plan Period, and would extend into the Regulation 19 Local Plan period – the **frequency** of the impact is therefore considered to be continuous.

6.149 The scale of the impact is assessed as high, the spatial extent is considered to be sub-regional, the duration is anticipated to be long term (permanent), and the frequency is expected to be continuous. Therefore, the **magnitude** of potential housing impacts is assessed as **high (beneficial)**.

Sensitivity of the receptor

- 6.150 Core Policy 2 (Delivery Strategy) and Core Policy 15 (Spatial strategy for the Melksham Community Area) of the adopted Local Plan place a high priority on delivering sufficient housing to meet the needs of the District, and Melksham specifically.
- 6.151 As set out above, there is a shortfall of 707 units compared to the identified requirement over the period 2006–2026 across Wiltshire as a whole, with a 706-unit shortfall in the subject sites' HMA. The **vulnerability** of the receptor is therefore assessed as high.
- 6.152 The beneficial effects of new housing development, such as improved availability and affordability, are generally intended to be permanent and beneficial. It is therefore not typically desirable to reverse these effects.
- 6.153 Nevertheless, if housing was to be removed, the introduction of a number of new dwellings irreversibly alters the housing landscape. Whilst housing numbers would return to pre-impact conditions if the physical units were removed, it is not feasible to assume that housing market conditions would similarly revert. The fundamental changes to housing conditions caused by housing supply and demand dynamics are enduring. The **recoverability** of the receptor is therefore assessed as low.
- 6.154 Adequate quality and supply of housing, including affordable housing, is essential for maintaining public health, economic stability, and social cohesion. Core Policy 2 (Delivery Strategy) and Core Policy 15 (Spatial strategy for the Melksham Community Area) of the adopted Local Plan place a high priority on delivering sufficient housing to meet the needs of Melksham. The **value** of the receptor is therefore assessed as high.
- 6.155 The vulnerability of the receptor is assessed as high, the recoverability of the receptor is assessed as low, and the value and importance of the receptor is assessed as high. The **sensitivity** of the receptor is therefore assessed as **high**.

Significance of effect

- 6.156 Overall, the magnitude of impact is assessed as high (beneficial) and the sensitivity of the receptor is assessed as high. The overall effect on housing is therefore assessed to be of **major (beneficial)** significance. This is significant in EIA terms.

Education

- 6.157 The likely increase in population has the potential to impact on the demand for education services in the local socio-economics study area and the Chippenham HMA.
- 6.158 There are multiple methods available for estimating pupil product. A summary of the context surrounding pupil yield calculation in Wiltshire is presented below:
- An initial position on pupil product ratios (PPR) was established via the Wiltshire Infrastructure Delivery Plan (IDP), published in December 2016;
 - An updated position on PPR has been set out via the Review and Update of the Infrastructure Delivery Plan, prepared as part of the Local Plan Review and published in September 2023. The PPR figures remain largely unchanged compared to the 2016 document – primary and secondary PPR figures are unchanged, and the early years figure has been slightly reduced; and
 - The Department for Education (DfE) has recently (2023) released the latest edition of Estimating Pupil Yield from Housing Development in England. The DfE has worked with the Office for National Statistics (ONS) to develop a recommended methodology for estimating pupil yield from new housing developments, to assist local authorities demonstrating the need for education facilities during local plan preparation and the consideration of planning applications. The Pupil Yield Dashboard provides pupil yield factors for each local authority in England, at county, unitary, and district level. Annual pupil yield factors since 2008 are available, allowing

consideration of how pupil yield has developed over time. Since the data is published by a UK Government department, it is treated as highly authoritative.

6.159 The pre-application response received from Wiltshire Council utilises the position set out within the IDP review. Considering the recency of the 2023 IDP review, and its use in the pre-application response, the IDP review PPR figures are utilised in this assessment.

6.160 Estimating Pupil Yield from Housing Development in England is also utilised in this assessment to provide sensitivity testing, as set out in Table 6.16.

TABLE 6.16 EDUCATION DEMAND AT FULL OCCUPANCY

PHASE/SOURCE	PPR (PER DWELLING)	PUPIL YIELD
Early years		
(1) Review and Update of the Wiltshire IDP (2023)	0.13	29
(2) DfE ratios	0.10	22
Primary education		
(1) Review and Update of the Wiltshire IDP (2023)	0.31	70
(2) DfE ratios	0.31	71
Secondary education		
(1) Review and Update of the Wiltshire IDP (2023)	0.22	50
(2) DfE ratios	0.16	36
Post-16 education		
(1) Review and Update of the Wiltshire IDP (2023)	N/A	–
(2) DfE ratios	0.07	16
Total		
(1) Review and Update of the Wiltshire IDP (2023) ¹⁸		165
(2) DfE ratios		145

Source: HJA analysis of Wiltshire Council and DfE PPR data.

Magnitude of impact

Early years

6.161 Table 6.16 sets out an estimate of between 22–29 new residents under the age of 5.

6.162 From September 2025, working parents of children under the age of five will be entitled to 30 hours of government funded childcare a week.

6.163 For the purposes of this assessment, it is assumed that all children under the age of five would take up the 30 hours childcare allowance.

6.164 Assuming childcare facilities operate for 40 hours per week, the Proposed Development would result in an estimated population of children requiring formal early years provision equivalent to approximately 22 full-time equivalent places.

¹⁸ Includes DfE ratio calculation for post-16 education pupil yield.

- 6.165 The Proposed Development includes the provision of a 100 place day nursery in line with Policy 20 of the Regulation 19 Local Plan. The quantum of land provided would meet the emerging Policy requirement for provision of 0.4 ha to provide a nursery of sufficient size to meet the Policy provision.
- 6.166 A nursery of this size would comfortably accommodate the additional early years demand associated with the Proposed Development, as well as providing capacity to meet demand growth in the wider Melksham Community Area.
- 6.167 In addition to formal early years provision, there is opportunity within the Proposed Development for home-based childminding businesses to operate, which would further contribute towards childcare provision.
- 6.168 The **scale** of the impact on early years services is assessed as medium (beneficial).
- 6.169 The impact is anticipated to predominantly effect populations within Melksham and its hinterland. The **spatial extent** is therefore considered to be local.
- 6.170 The estimated early years pupil population increase is anticipated to have a long-term **duration**, and is considered to be permanent.
- 6.171 The estimated early years pupil population increase would continue as the Proposed Development continues to be built out and residents continue to occupy units – the **frequency** of the impact is therefore considered to be continuous.
- 6.172 The scale of the impact is assessed as medium (beneficial), the spatial extent is considered to be local, the duration is anticipated to be long-term (permanent), and the frequency is expected to be continuous. Therefore, the **magnitude** of potential impacts on early years education is assessed as **medium (beneficial)**.

Primary education

- 6.173 Table 6.16 sets out an estimate of between 70–71 additional primary-aged pupils associated with the Proposed Development.
- 6.174 Wiltshire Council's pre-application response identifies capacity of 1,383 places at primary schools within 2-mile safe walking distance (including places already secured by s106 agreement). Pupils on roll data indicates there are 1,149 pupils currently in attendance at these schools. Further places required by in area housing that has been approved but not yet completed is estimated at 413 places. As such, the pre-application response establishes a position of no places currently available at primary schools within area.
- 6.175 The primary-aged pupil yield associated with the Proposed Development is therefore estimated to exceed the existing unfilled places in schools within a 2-mile safe walking distance.
- 6.176 As set out in detail at paragraphs 6.116–6.120, population growth can have both beneficial and adverse effects, with the overall impact largely contingent on various factors such as infrastructure, resources and planning. At this stage of the assessment (prior to consideration of additional mitigation measures), there is no mitigation to consider which would offset the identified pupil population impacts on primary education services. As such, at this stage of the assessment, the impact is assessed as adverse.
- 6.177 Overall, given the absence of mitigation at this stage of the assessment, and the estimate by which existing unfilled places could be exceeded, the **scale** of impact on primary education is assessed as low (adverse).
- 6.178 The impact is anticipated to predominantly effect populations within Melksham and its hinterland. The **spatial extent** is therefore considered to be local.
- 6.179 The estimated primary pupil population increase is anticipated to have a long-term **duration**, and is considered to be permanent.
- 6.180 The estimated primary pupil population increase would continue as the Proposed Development continues to be built out and residents continue to occupy units – the **frequency** of the impact is therefore considered to be continuous.

6.181 The scale of the impact is assessed as low (adverse), the spatial extent is considered to be local, the duration is anticipated to be long-term (permanent), and the frequency is expected to be continuous. Therefore, the **magnitude** of potential impacts on primary education is assessed as **low (adverse)**.

Secondary education

- 6.182 Table 61.6 sets out an estimate of between 36–50 additional secondary-aged pupils associated with the Proposed Development.
- 6.183 Wiltshire Council's pre-application response identifies Melksham Oak as the designated secondary serving the Melksham area, and no other secondary lies within 3 miles safe walking distance of the application site. The pre-application response identifies a capacity of 1,500 places at Melksham Oak. Pupils on roll data indicates there are 1,055 pupils currently in attendance at Melksham Oak.
- 6.184 Further places required by in area housing that has been approved but not yet completed is estimated at 349 places.
- 6.185 Whilst the pre-application response establishes a position of no places currently available at secondary schools within a safe walking distance of 3 miles, this is based on forecasted pupil on roll numbers in September 2024 (1,154), not actual numbers (see above). Using the latest figures for number of pupils on roll indicates there would be sufficient capacity to accommodate the estimated secondary-aged pupil population associated with the Proposed Development.
- 6.186 Furthermore, since the Council's pre-application response was issued, an application for a development of 300 dwellings at Snarlton Farm (PL/2024/07097) has been refused, which would free up additional places within the calculation of further places required by in area housing that has been approved but not yet completed.
- 6.187 As a result, Wiltshire Council has reassessed its original request for a secondary contribution, and has now confirmed to the Applicant via comment number WC-25-08-345043 there is no longer a requirement for a contribution towards secondary school places.
- 6.188 As set out in detail at paragraphs 6.116–6.120, population growth can have both beneficial and adverse effects, with the overall impact largely contingent on various factors such as infrastructure, resources and planning. At this stage of the assessment (prior to consideration of additional mitigation measures), there is no mitigation to consider which would offset the identified pupil population impacts on secondary education services. As such, at this stage of the assessment, the impact is assessed as adverse.
- 6.189 Overall, the **scale** of the impact is therefore assessed as negligible.
- 6.190 The impact is anticipated to predominantly effect populations within Melksham and its hinterland. The **spatial extent** is therefore considered to be local.
- 6.191 The estimated secondary pupil population increase is anticipated to have a long-term **duration**, and is considered to be permanent.
- 6.192 The estimated secondary pupil population increase would continue as the Proposed Development continues to be built out and residents continue to occupy units – the **frequency** of the impact is therefore considered to be continuous.
- 6.193 The scale of the impact is assessed as negligible, the spatial extent is considered to be local, the duration is anticipated to be long-term (permanent), and the frequency is expected to be continuous. Therefore, the **magnitude** of potential impacts on secondary education is assessed as **negligible**.

Post-16 education

- 6.194 It is estimated that 16 residents of the Proposed Development could require post-16 education. Post-16 education is not typically provided as locally as secondary or primary education with students more likely to travel further for provision. It is likely the potential increased demand could be absorbed into existing post-16 education provision.

- 6.195 At this stage of the assessment, there is no mitigation required to offset the identified pupil population impacts on post-16 education services. The impact is therefore assessed as neutral, since post-16 education services could continue to operate within capacity and would not be subject to beneficial or adverse impacts.
- 6.196 The **scale** of impact is therefore assessed as negligible.
- 6.197 The impact is anticipated to predominantly effect populations within Melksham and its hinterland. The **spatial extent** is therefore considered to be local.
- 6.198 The estimated post-16 pupil population increase is anticipated to have a long-term **duration**, and is considered to be permanent.
- 6.199 The estimated post-16 pupil population increase would continue as the Proposed Development continues to be built out and residents continue to occupy units – the **frequency** of the impact is therefore considered to be continuous.
- 6.200 The scale of the impact is assessed as negligible, the spatial extent is considered to be local, the duration is anticipated to be long-term (permanent), and the frequency is expected to be continuous. Therefore, the **magnitude** of potential impacts on post-16 education is assessed as **negligible**.

Sensitivity of the receptor

Early years

- 6.201 The IDP review (2023) reports that an additional 156 early years places are required in Melksham up to 2038. Wiltshire Council identifies the need for 60 places to be provided within the new 2 FE primary school (see below), and 100 places within the new nursery as part of the Proposed Development. Given that approximately 84% of registered early years places are provided by private operators, it is assumed that private capacity could also be increased to accommodate additional demand. On this basis, the **vulnerability** of the receptor is assessed as low.
- 6.202 An increase in early years pupil population due to relocation is considered to be a permanent impact, therefore the **recoverability** of the receptor is assessed as low.
- 6.203 The receptor is considered a policy priority, given that early years provision is a statutory duty. The **value** of the receptor is therefore assessed as high.
- 6.204 The vulnerability of the receptor is assessed as low, the recoverability of the receptor is assessed as low, and the value of the receptor is assessed as high. The **sensitivity** of the receptor is therefore assessed as **medium**.

Primary education

- 6.205 The IDP review (2023) reports that an additional 371 primary school places are required in Melksham up to 2038. Wiltshire Council reports there is insufficient surplus places to accommodate the identified level of demand, and there is a need for at least one new 2 FE primary school located on a new residential development site. This suggests the vulnerability of the receptor is high.
- 6.206 However, there is also policy provision in place to address this shortfall in places, which suggests there are proactive measures that can be taken to reduce the vulnerability of the receptor. As such, the **vulnerability** of the receptor is assessed as medium.
- 6.207 An increase in primary-age pupil population due to relocation is considered to be a permanent impact, therefore the **recoverability** of the receptor is assessed as low.
- 6.208 The receptor is considered a policy priority, given that primary education is a statutory duty. The **value** of the receptor is therefore assessed as high.
- 6.209 The vulnerability of the receptor is assessed as high, the recoverability of the receptor is assessed as low, and the value of the receptor is assessed as high. The **sensitivity** of the receptor is therefore assessed as **medium**.

Secondary education

- 6.210 The IDP review (2023) reports that an additional 292 secondary school places are required in Melksham up to 2038. Wiltshire Council reports in the IDP review (2023) that current levels of surplus places at Melksham Oak Community School would be sufficient in the early part of the Plan period. However, as the Plan period progresses, additional places would be required to meet the demand generated by new housing. This suggests the vulnerability of the receptor is high.
- 6.211 However, there is also policy provision in place to address this shortfall in places (via developer contribution), which suggests there are proactive measures that can be taken to reduce the vulnerability of the receptor. As such, the **vulnerability** of the receptor is assessed as medium.
- 6.212 An increase in secondary-age pupil population due to relocation is considered to be a permanent impact, therefore the **recoverability** of the receptor is assessed as low.
- 6.213 The receptor is considered a policy priority, given that secondary education is a statutory duty. The **value** of the receptor is therefore assessed as high.
- 6.214 The vulnerability of the receptor is assessed as medium, the recoverability of the receptor is assessed as low, and the value of the receptor is assessed as high. The **sensitivity** of the receptor is therefore assessed as **medium**.

Post-16 education

- 6.215 Melksham Community School offers post-16 education. Under the assumption that students typically travel further to access post-16 education than to secondary schools, it is expected that schools and Further Education institutions in the wider area could also accommodate post-16 pupil yield from the Proposed Development. On this basis, the **vulnerability** of the receptor for post-16 education provision is assessed as low.
- 6.216 An increase in the post-16 pupil population due to relocation is considered to be a permanent impact, therefore the **recoverability** of the receptor is assessed as low.
- 6.217 Post-16 education is not a statutory duty. The **value** of the receptor is therefore assessed as medium.
- 6.218 The vulnerability of the receptor is assessed as low, the recoverability of the receptor is assessed as low, and the value of the receptor is assessed as medium. The **sensitivity** of the receptor is therefore assessed as **medium**.

Significance of effect

Early years

- 6.219 The magnitude of the impact on early years education is assessed as medium (beneficial), and the sensitivity of the receptor is assessed as medium. The overall effect on early years education is therefore assessed to be of **moderate (beneficial)** significance. This is significant in EIA terms.

Primary education

- 6.220 The magnitude of the impact on primary education is assessed as low (adverse), and the sensitivity of the receptor is assessed as medium. The effect on primary education is therefore assessed to be of **minor (adverse)** significance. This is not significant in EIA terms.

Secondary education

- 6.221 The magnitude of the impact on secondary education is assessed as negligible, and the sensitivity of the receptor is assessed as medium. The effect on secondary education is therefore assessed to be of **negligible** significance. This is not significant in EIA terms.

Post-16 education

6.222 The magnitude of the impact on post-16 education is assessed as negligible, and the sensitivity of the receptor is assessed as medium. The effect on post-16 education is therefore assessed to be of **negligible** significance. This is not significant in EIA terms.

Healthcare

6.223 The likely increase in population has the potential to impact on the demand for healthcare services in the local socio-economics study area and Chippenham HMA.

Magnitude of impact

6.224 As set out in detail at paragraphs 6.116–6.120, population growth can have both beneficial and adverse effects, with the overall impact largely contingent on various factors such as infrastructure, resources and planning. In the specific case of the healthcare services receptor, population growth can place a strain on resources and infrastructure where appropriate planning is lacking – sufficient healthcare capacity can become more challenging to provide as a population expands. At this stage of the assessment (prior to consideration of additional mitigation measures), there is no mitigation to consider which would offset adverse impacts on healthcare services. As such, at this stage of the assessment, the impact is assessed as adverse.

6.225 The estimated net residential population of the Proposed Development, once fully occupied, is 392. This population represents a 1.4% increase in patients compared to the current number of total patients in Melksham Community Area GP surgeries. The scale of the impact is therefore assessed as low.

6.226 Although the impact is anticipated to predominantly effect healthcare services within Melksham and its hinterland, healthcare services are delivered at a larger spatial scale than town level. The **spatial extent** is therefore considered to be sub-regional.

6.227 The estimated population increase – and any subsequent impact on healthcare services – is anticipated to have a long-term **duration**, and is considered to be permanent.

6.228 The estimated population increase – and any subsequent impact on healthcare services – would continue as the Proposed Development continues to be built out and residents continue to occupy units. The **frequency** of the impact is therefore considered to be continuous.

6.229 The scale of the impact is assessed as low, the spatial extent is considered to be sub-regional, the duration is anticipated to be long-term (permanent), and the frequency is expected to be continuous. Therefore, the **magnitude** of potential impacts on healthcare services is assessed as **low (adverse)**.

Sensitivity of the receptor

6.230 Healthcare services in Bath and North East Somerset, Swindon and Wiltshire ICB are delivered through a combination of public and private providers, including general practitioners (GPs), hospitals, specialist clinics, and community health services.

6.231 As is the case with healthcare services across England, resources are often stretched, particularly in terms of staffing and capacity. Access to healthcare services is generally good – Wiltshire ranks in the 74th centile in the IMD 'Health Deprivation and Disability'. The number of GPs to every 100,000 patients in the Melksham area is similar to the Bath and North East Somerset, Swindon and Wiltshire ICB and England averages.

6.232 There are challenges around health services' ability to meet future demand as the population grows (this is a national issue). Population increases have the potential to result in longer waiting times, reduced access to services, and overall diminished quality of care. This suggests the vulnerability of the receptor is high.

6.233 However, with adequate planning and investment, strategic development can enhance healthcare capacity through new facilities, increased funding, and better recruitment and retention of healthcare professionals, which can reduce the vulnerability of the receptor. As such, the **vulnerability** of the receptor is assessed as medium.

- 6.234 In instances where healthcare services are strained due to increased demand, recovery can require additional time and resources, including hiring staff, expanding facilities, and restructuring service delivery. Implementation of such steps can be slow, suggesting a low level of recoverability.
- 6.235 However, in the case of positive changes such as new and/or upgraded infrastructure and additional resources, the healthcare services would not need to "recover" but rather sustain and build upon improvements. Therefore, while high recoverability is typically desirable, in the case of beneficial impacts, maintaining the improved state is more relevant.
- 6.236 Whilst the system can recover from adverse impacts (albeit with substantial effort), the focus should be on sustaining positive changes – the **recoverability** of the receptor is therefore assessed as medium.
- 6.237 Healthcare services are of high **value** to the community of Melksham. They are essential for maintaining public health, supporting the workforce, and ensuring overall quality of life.
- 6.238 The vulnerability of the receptor is assessed as high, the recoverability of the receptor is assessed as medium, and the value and importance of the receptor is assessed as high. The **sensitivity** of the receptor is therefore assessed as **medium**.

Significance of effect

- 6.239 Overall, the magnitude of the impact on healthcare services is assessed as low (adverse), and the sensitivity of the receptor is assessed as medium. The overall effect on healthcare services is therefore assessed to be of **minor (adverse)** significance. This is not significant in EIA terms.

Community services

- 6.240 The likely increase in population has the potential to impact on the demand for other community services in the local socio-economics study area.

Magnitude of impact

- 6.241 As set out in detail at paragraphs 6.116–6.120, population growth can have both beneficial and adverse effects, with the overall impact largely contingent on various factors such as infrastructure, resources and planning. In the specific case of the community services receptor, population growth can both stimulate economic activity and development, and place a strain on resources and infrastructure where appropriate planning is lacking. Effective planning for these factors is a key determinant of whether effects associated with population growth should be considered beneficial or adverse in nature.
- 6.242 The Proposed Development is estimated to accommodate 392 net additional residents at full occupancy. Assuming a consistent build-out rate of 42 dwellings per annum during the 7-year construction phase, this would support around 56 net additional residents per annum. This would represent a 0.2% annual increase in Melksham's population based on Census 2021 data (ONS, 2024). The average annual change in Melksham's population during the intercensal period 2011–2021 was 1.5% growth per annum. The **scale** of the impact is therefore assessed as negligible.
- 6.243 The impact is anticipated to predominantly effect populations within Melksham and its hinterland. The **spatial extent** is therefore considered to be local.
- 6.244 The estimated population increase – and the associated impact on community services – is anticipated to have a long-term **duration**, and is considered to be permanent.
- 6.245 The estimated population increase – and the associated impact on community services – would continue as the Proposed Development continues to be built out and residents continue to occupy units. The **frequency** of the impact is therefore considered to be continuous.
- 6.246 As set out in detail at paragraphs 6.116–6.120, population growth can have both beneficial and adverse effects. There is no certainty at this stage whether, for example, population growth would lead to capacity constraints (adverse), or whether higher demand for goods and services would support job creation and generating revenue for the local authority (beneficial). Impacts are likely to vary between different community service assets. As such, the impact is assessed as neutral.

6.247 The scale of the impact is assessed as low, the spatial extent is considered to be local, the duration is anticipated to be long-term (permanent), and the frequency is expected to be continuous. Overall, the **magnitude** of potential impacts on community services is therefore assessed as **negligible**.

Sensitivity of the receptor

6.248 As set out at paragraph 6.242, the annual population change supported by the Proposed Development (based on an average delivery of 42 dwellings per annum) is substantially lower than the average annual population change during the intercensal period 2011–2021.

6.249 Melksham has a broad community services offer. Health facilities include multiple dental practices, pharmacies, opticians, and care homes. Education facilities include nurseries and a library. There is a wide-ranging leisure and recreation offer, including a leisure centre, gyms, sports clubs, and community venues. Arts and entertainment facilities include Melksham Assembly Hall. Religious facilities include numerous churches of most major denominations. Retail facilities include major supermarkets, high street chains, and a varied convenience and comparison offer. Public services include a post office and emergency service stations. Hospitality venues include food and drinks venues and overnight accommodation. Transport facilities include a railway station and bus services.

6.250 It is therefore assumed that community services in Melksham are of sufficient scale to be accustomed to accommodating a much higher population increase than the Proposed Development would support. It is also assumed that proactive action can be taken across community service areas to adjust to population growth. The **vulnerability** of the receptor is therefore assessed as low.

6.251 An increase in population due to relocation – and the associated impact on community services – is considered to be a permanent impact, therefore the **recoverability** of the receptor is assessed as low.

6.252 Since services to residents is the receptors, the **value** of the receptor is assessed as high.

6.253 The vulnerability of the receptor is assessed as low, the recoverability of the receptor is assessed as low, and the value and importance of the receptor is assessed as high. The overall **sensitivity** of the receptor is assessed as **low**.

Significance of effect

6.254 Overall, the magnitude of impact is assessed as negligible, and the sensitivity of the receptor is assessed as low. The overall effect of the operational phase on community services is therefore assessed to be of **negligible** significance. This is not significant in EIA terms.

Open space

6.255 The inclusion of open space as part of the Proposed Development has the potential to increase open space provision in Melksham.

Magnitude of impact

6.256 In total, the application provides 4.65 ha of public open space. This level of provision equates to 6.7 ha of public open space provision per 1,000 residents, or 67 sqm of public open space provision per resident (based on a residential occupancy of 2.36 persons per dwelling).

6.257 This level of provision is just under two and half times in excess of the requirement set out in the West Wiltshire Recreation and Leisure Development Plan Document (25.88 sqm per person). The requirement is based on all types of open space, including those that are more suited to off-site provision, including bowling greens, sports pitches, sports halls, and swimming pools.

6.258 The level of provision identified within the development description is also substantially in excess of the emerging public open space requirements identified in the Local Plan Review, as first set out in the 2020 Open Space Assessment.

6.259 This substantial over-provision of public open space will promote social wellbeing and better health outcomes, and in doing so will contribute to the achievement of policy outcomes.

- 6.260 With regards to the typologies references in Table 2 of the West Wiltshire and Leisure Development Plan Document, the proposed development includes allotments, equipped play space, multi-functional green space, and urban parks.
- 6.261 Overall, the **scale** of impact is assessed as low.
- 6.262 The impact is anticipated to predominantly effect populations within Melksham and its hinterland. The **spatial extent** is therefore considered to be local.
- 6.263 The open space provision within the Proposed Development is anticipated to have a long-term **duration**, and is considered to be permanent.
- 6.264 The **frequency** of the impact is therefore considered to be continuous.
- 6.265 Overall, the scale of the impact is assessed as low (beneficial), the spatial extent is considered to be local, the duration is anticipated to be long-term (permanent), and the frequency is expected to be continuous. Overall, the **magnitude** of potential impacts on open space is therefore assessed as **low (beneficial)**.

Sensitivity of the receptor

- 6.266 As per Table 6.15, with Melksham and Melksham Without there is currently a shortfall of allotments, amenity green space, and play space (children and youth), whilst there is assumed to be sufficient supply of other typologies. It is also assumed that proactive measures can be taken to address shortfalls in open space provision. As such, the **vulnerability** of the receptor is assessed as medium.
- 6.267 An increase in open space is considered to be a permanent impact, therefore the **recoverability** of the receptor is assessed as low.
- 6.268 Open space offers numerous benefits to local communities. Open space can provide areas for recreation e.g. walking and cycling, promoting active lifestyles. It can also enhance the visual appeal of an area, contributing to resident satisfaction, and can be used for environmental education by offering learning experiences about nature and sustainability. There are health, social, environmental, and cultural risks to not providing sufficient open space.
- 6.269 The importance of open space is reflected in national policy. Paragraph 96 of the NPPF sets out that “planning policies and decisions should aim to enable and support healthy lifestyles, for example through the provision of safe and accessible green infrastructure, allotments and layouts that encourage walking and cycling.” Paragraph 102 states that “access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change.”
- 6.270 Therefore, the **value** of the receptor is assessed as high.
- 6.271 Overall, the vulnerability of the receptor is assessed as medium, the recoverability of the receptor is assessed as low, and the value of the receptor is assessed as high. The overall **sensitivity** of the receptor is assessed as **medium**.

Significance of effect

- 6.272 Overall, the magnitude of impact is assessed as low (beneficial), and the sensitivity of the receptor is assessed as medium. The overall effect of the operational phase on open space is therefore assessed to be of **minor (beneficial)** significance. This is not significant in EIA terms.

ACTIONABLE MITIGATION

Construction phase

- 6.273 The effect of the construction phase on employment is assessed as minor (beneficial) long term significance. Additional mitigation is therefore not required.

Operation phase

6.274 The developer will make a contribution via the appropriate mechanism in order to deliver the **education** and **healthcare** infrastructure needed to support the Proposed Development.

RESIDUAL IMPACT ASSESSMENT

Construction phase

Employment

6.275 Overall, the magnitude of the residual impact on employment is assessed as low (beneficial), and the sensitivity of the receptor is assessed as medium. The overall residual effect on employment is therefore assessed to be of **minor (beneficial)** significance. This is not significant in EIA terms.

Operation phase

Population

6.276 Overall, the magnitude of the residual impact on population is assessed as low (neutral), and the sensitivity of the receptor is assessed as high. The overall residual effect of the operation phase on population is therefore assessed to be of **moderate (neutral)** significance. Given the effect is neutral, this is not significant in EIA terms.

Housing

6.277 Overall, the magnitude of the residual impact on housing is assessed as high (beneficial) and the sensitivity of the receptor is assessed as high. The overall residual effect on housing is therefore assessed to be of **major (beneficial)** significance. This is significant in EIA terms.

Education

Early years

6.278 The magnitude of the residual impact on early years education is assessed as medium (beneficial), and the sensitivity of the receptor is assessed as medium. The overall residual effect on early years provision is therefore assessed to be of **moderate (beneficial)** significance. This is significant in EIA terms.

Primary education

6.279 Before considering mitigation, the primary-aged pupil yield associated with the Proposed Development is estimated to exceed the forecast capacity in primary schools within a safe walking distance of 2 miles of the application site.

6.280 Actionable mitigation via developer contribution would provide a financial contribution that could be invested by Wiltshire Council in education infrastructure to increase primary school capacity. This would ensure the primary-age pupil yield of 70–71 associated with the Proposed Development could be fully accommodated within local schools.

6.281 Actionable mitigation would therefore ensure that primary education services could continue to operate within capacity and would not be subject to adverse impacts.

6.282 Therefore, the magnitude of the residual impact on primary education is assessed as negligible, and the sensitivity of the receptor is assessed as medium. The overall residual effect on primary education is therefore assessed to be of **negligible** significance. This is not significant in EIA terms.

Secondary education

6.283 As per Wiltshire Council's latest advice to the Applicant, no actionable mitigation is required on the matter of secondary school capacity.

6.284 The magnitude of the residual impact on secondary education is assessed as negligible, and the sensitivity of the receptor is assessed as medium. The residual effect on secondary education is therefore assessed to be of **negligible** significance. This is not significant in EIA terms.

- 6.285 The magnitude of the residual impact on post-16 education is assessed as negligible, and the sensitivity of the receptor is assessed as medium. The residual effect on post-16 education is therefore assessed to be of **negligible** significance. This is not significant in EIA terms.

Healthcare

- 6.286 Before considering mitigation, the population increase associated with the Proposed Development is estimated to place additional pressure on healthcare infrastructure in Melksham, resulting in an adverse impact.
- 6.287 Actionable mitigation via developer contribution would provide a financial contribution that could be invested by Bath and North East Somerset, Swindon and Wiltshire ICB in healthcare infrastructure to increase capacity.
- 6.288 Actionable mitigation would therefore ensure that healthcare services could continue to operate within capacity and would not be subject to adverse impacts.
- 6.289 Therefore, the magnitude of the residual impact on healthcare services is assessed as negligible, and the sensitivity of the receptor is assessed as medium. The overall residual effect on healthcare services is therefore assessed to be of **negligible** significance. This is not significant in EIA terms.

Community services

- 6.290 Overall, the magnitude of the residual impact is assessed as negligible, and the sensitivity of the receptor is assessed as low. The overall residual effect on community services is therefore assessed to be of **negligible** significance. This is not significant in EIA terms.

Open space

- 6.291 Before considering additional mitigation, the provision of open space within the Proposed Development is substantially in excess of existing and emerging requirements, resulting in a beneficial impact.
- 6.292 Therefore, the magnitude of the residual impact on open space is assessed as low (beneficial), and the sensitivity of the receptor is assessed as medium. The overall residual effect on open space is therefore assessed to be of **minor (beneficial)** significance. This is not significant in EIA terms.

CUMULATIVE IMPACTS

- 6.293 This section considers other schemes that have the potential to significantly effect the socio-economic receptors considered in this assessment.
- 6.294 Table 6.17 sets out the developments that may have cumulative impacts relevant to those of the Proposed Development. There are different considerations to be made for construction and operation phases.

TABLE 6.17 CUMULATIVE SITES

REFERENCE	PLANNING REFERENCE	SCHEME	UNITS	APPLICATION DESCRIPTION
W18.4477	18/04477/REM	Land South of Western Way, Melksham	213	Reserved matters application pursuant to 16/01123/OUT and 17/06285/REM (access). Erection of 213 dwellings and associated works at Land South of Western Way, Bowerhill, Melksham.
18/04644/REM	14/10461/OUT	Land East of Spa Road, Melksham	450	Outline application for up to 450 dwellings with associated access and engineering operations, land for extension of medical facilities or community facility, and extension to Eastern Relief Road from Thyme Road to The Spa - Snowberry Lane.
WI 7.10015	17/10015/FUL	Bowden Guest House, 25-27 Beanacre Rd, Melksham	10	Conversion and extension of bed and breakfast establishment into 10 self-contained flats.
WI 7.1251	17/12514/REM	Land East of Semington Road, Melksham	150	Development of 150 dwellings with associated access, infrastructure, parking, landscaping and local equipped area of play. Following outline permission 16/00497/OUT
W13.7076	13/07076/FUL	3 Lowbourne, Melksham	17	Demolition of existing building and erection of 17 flats and associated works
20/01938/OUT	20/01938/OUT	Land East of Semington Road, Melksham	144	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.
20/02213/FUL	20/02213/FUL	Park Farm, Seend Cleeve, Melksham	11	Erection of one four-bed self-build house and 10 affordable houses.
PL/2023/11188	PL/2023/11188	Land at Blackmore Farm	500	Demolition of agricultural buildings and development of up to 500 dwellings; up to 5,000 sqm of employment (class E(g)(i)) and class E(g)(ii); land for the 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)
–	PL/2022/08504	Land South of Western Way, Melksham	210	Outline application for the erection of up to 210 residential dwellings, c. 1.75 km southwest of application site.
–	PL/2022/08155	Land to the West of Semington Road, Melksham	53	Outline planning permission for up to 53 dwellings including formation of access and associated works, with all other matters reserved.

–	PL/2023/06976	Land at Verbena Court, Melksham	71 (beds)	Construction of a care home (within Class C2), parking, access, hard and soft landscaping and other associated works.
–	PL/2023/06725	Land at Verbena Court, Melksham	86 (beds)	Construction of elderly care home (Use Class C2) with associated access works, landscaping and drainage. Improvements to site access and Longleaze Lane/Snowberry Lane junction.
		Total	1,899	

Construction phase

Employment

Magnitude of impact

6.295 It is assumed that construction of all cumulative projects will not overlap entirely with the construction phase of the Proposed Development for some of the following reasons:

- Some projects may not be permitted;
- Some projects may be permitted at different times – some projects are currently at outline application stage, whilst others are at full/reserved matters application stage;
- Projects with fewer units are likely to have shorter construction phases, whilst projects with the greatest number of units are likely to have longer construction phases; and
- Some projects may be permitted and fully built-out in advance of the Proposed Development commencing works.

6.296 As such, whilst the number of units associated with all cumulative projects is roughly five times the Proposed Development, the consenting, development, and construction sequencing will differ so that a complete overlap of all projects in a given year is unlikely. However, it is also likely there will be overlap with some scheme's construction phases.

6.297 The construction phase of all cumulative projects provides an opportunity to deliver an investment in skills and employability, including work placements, apprenticeships and other activities. This would enhance employment impacts.

6.298 Considering the scale of the Proposed Development's impact is assessed as low, and the likelihood of overlap with some schemes and their associated employment impacts, the **scale** of the cumulative impact on employment is assessed as medium (i.e. higher than the Proposed Development in isolation).

6.299 Overall, the scale of the cumulative impact is assessed as medium, the **spatial extent** is considered to be sub-regional, the **duration** is anticipated to be medium-term (temporary), and the **frequency** is expected to be intermittent. Therefore, the **magnitude** of potential cumulative impacts on employment and wages is assessed as **medium (beneficial)**.

Sensitivity of receptor

6.300 Where construction phases do overlap with the Proposed Development, the construction sector at large operates in a manner that can respond flexibly to changes in conditions. If multiple developments are brought forward simultaneously which results in an unmet demand for labour within the local construction sector there are three likely outcomes:

- Some schemes will be delayed until the local construction sector can meet the required labour demands.
- Labour is brought in from further afield to deliver schemes sooner.
- The local construction sector can increase capacity to meet demand through recruitment and upskilling.

6.301 Overall, the **vulnerability** of the receptor is assessed as low, the **recoverability** of the receptor is assessed medium, and the **value** of the receptor is assessed as high. The overall **sensitivity** of the receptor is therefore assessed as **medium**.

Significance of effect

6.302 Overall, the magnitude of the cumulative impact is assessed as medium (beneficial), and the sensitivity of the receptor is assessed as medium. The overall cumulative effect is therefore assessed to be of **moderate (beneficial)** significance. This is significant in EIA terms.

Operation phase

6.303 For the purposes of this assessment, it is assumed the operation phase of all cumulative projects overlaps with the Proposed Development.

Population

Magnitude of impact

6.304 Delivery of additional housing has the potential to cumulatively increase the size of the population of Melksham and the Chippenham HMA.

6.305 To provide a very approximate estimate of the potential population impacts associated with the identified cumulative projects, the same assumptions have been applied to the cumulative quantum of housing units. This approach provides an estimate of around 4,482 residents at full occupancy of all schemes (based on 2.36 persons per dwelling), which equates to 2,524 net additional residents.

6.306 Assuming an even delivery of cumulative projects to the end of the Local Plan Review period (2038, 14 years), the estimated cumulative net additional population would represent an average annual increase of 0.8% per annum in Melksham's population. The average annual change in Melksham's population during the intercensal period 2011–2021 was 1.5% growth per annum, which is substantially above the cumulative scenario.

6.307 The **scale** of the cumulative impact is assessed as medium, the **spatial extent** is considered to be sub-regional, the **duration** is anticipated to be long-term (permanent), and the **frequency** is expected to be continuous. The overall **magnitude** of potential cumulative impacts on population is assessed as **medium (neutral)**.

Sensitivity of receptor

6.308 As set out at paragraph 6.306, the estimated net additional annual population change supported by the Proposed Development and all cumulative projects is lower than the average annual population change in Melksham during the intercensal period 2011–2021.

6.309 The above considers the effect of migration on population growth. Consideration also needs to be given to natural population growth, where the birth rate of an area exceeds the death rate. Since the estimated level of population growth resulting from migration is lower than historic rates of population growth in Melksham, this leaves some tolerance for natural population growth to account for a further population growth in Melksham.

6.310 Since the estimated migration associated with the Proposed Development and cumulative projects is lower than historic population growth rates in Melksham before considering natural population growth, the **vulnerability** of the receptor is assessed as low.

6.311 The **recoverability** of the receptor is assessed medium, and the **value** of the receptor is assessed as high.

6.312 The overall **sensitivity** of the receptor is therefore assessed as **medium**.

Significance of effect

6.313 Overall, the magnitude of the cumulative impact is assessed as medium (neutral), and the sensitivity of the receptor is assessed as medium. The overall cumulative effect is therefore assessed to be of

moderate (neutral) significance. Given the effect on population is neutral, this is not significant in EIA terms.

Housing

6.314 Delivery of additional housing has the potential to cumulatively increase delivery to meet the identified Local Plan housing need.

Magnitude of impact

6.315 Core Policy 2 (Delivery Strategy) of the Local Plan sets out the requirement of around 120 additional dwellings per annum (on average) in Melksham over the Plan period.

6.316 Assuming an even delivery of cumulative projects over the remainder of the Local Plan Review period (to 2038, 14 years), the average delivery rate (~157 dwellings per annum) would meet approximately 131% of the Core Strategy's requirement for 120 dwellings per annum in Melksham.

6.317 The **scale** of the cumulative impact is assessed as high, the **spatial extent** is considered to be local, the **duration** is anticipated to be long-term (permanent), and the **frequency** is expected to be continuous. The overall **magnitude** of potential cumulative impacts on housing is assessed as **high (beneficial)**.

Sensitivity of receptor

6.318 As set out at paragraph 6.155, the **vulnerability** of the receptor is assessed as high, the **recoverability** of the receptor is assessed as low, and the **value** of the receptor is assessed as high. The **sensitivity** of the receptor is therefore assessed as **high**.

Significance of effect

6.319 Overall, the magnitude of the cumulative impact is assessed as high (beneficial) and the sensitivity of the receptor is assessed as high. The overall cumulative effect on housing is therefore assessed to be of **major (beneficial)** significance. This is significant in EIA terms.

Education

Magnitude of impact

6.320 Those relevant committed developments that will create additional demand on education services through increasing the pupil population will be expected to mitigate any potentially adverse effects. Mitigation will either be included within scheme design, or more likely supported through developer contributions. In this way, planning policy will determine that no overall net adverse impact will result from any single development, which will translate to the significance of potential cumulative impacts being assessed as neutral.

6.321 The **scale** of the cumulative impact at all education phases is assessed as negligible, the **spatial extent** is considered to be local, the **duration** is anticipated to be long-term (permanent), and the **frequency** is expected to be continuous. The overall **magnitude** of potential cumulative impacts on education services at all phases is assessed as **negligible**.

Sensitivity of receptor

6.322 As per paragraphs 6.204, 6.209, 6.214, and 6.218, the sensitivity of all education receptors is assessed as **medium**.

Significance of effect

6.323 The magnitude of the impact on early years education is assessed as negligible, and the sensitivity of the receptor is assessed as medium. The overall effect on **early years** is therefore assessed to be of **negligible** significance. This is not significant in EIA terms.

6.324 The magnitude of the impact on primary education is assessed as negligible, and the sensitivity of the receptor is assessed as medium. The overall effect on **primary education** is therefore assessed to be of **negligible** significance. This is not significant in EIA terms.

- 6.325 The magnitude of the impact on secondary education is assessed as negligible, and the sensitivity of the receptor is assessed as medium. The overall effect on **secondary education** is therefore assessed to be of **negligible** significance. This is not significant in EIA terms.
- 6.326 The magnitude of the impact on post-16 education is assessed as negligible, and the sensitivity of the receptor is assessed as medium. The overall effect on **post-16 education** is therefore assessed to be of **negligible** significance. This is not significant in EIA terms.

Healthcare

Magnitude of impact

- 6.327 Those relevant committed developments that will create additional demand on healthcare services through increasing the resident population will be expected to mitigate any potentially adverse effects. Mitigation will be supported through developer contribution. In this way, planning policy will determine that no overall net adverse impact will result from any single development, which will translate to the significance of potential cumulative impacts being assessed as neutral.
- 6.328 The **scale** of the cumulative impact is assessed as negligible, the **spatial extent** is considered to be local, the **duration** is anticipated to be long-term (permanent), and the **frequency** is expected to be continuous. The overall **magnitude** of potential cumulative impacts on healthcare services is assessed as **negligible**.

Sensitivity of receptor

- 6.329 As per paragraph 6.238, the sensitivity of the healthcare services receptor is assessed as medium.

Significance of effect

- 6.330 Overall, the magnitude of the cumulative impact on healthcare services is assessed as negligible, and the sensitivity of the receptor is assessed as medium. The overall cumulative effect on healthcare services is therefore assessed to be of **negligible** significance. This is not significant in EIA terms.

Community services

Magnitude of impact

- 6.331 Delivery of additional housing has the potential to cumulatively increase the size of the population of Melksham and the Chippenham HMA, thereby exerting a cumulative impact on community services.
- 6.332 As set out at paragraph 6.246, there is no certainty at this stage whether, for example, population growth would lead to capacity constraints (adverse), or whether higher demand for goods and services would support job creation and generating revenue for the local authority (beneficial). Impacts are likely to vary between different community service assets. As such, the impact is assessed as neutral.
- 6.333 Overall, the magnitude of potential cumulative impacts on community services is therefore assessed as low (neutral).

Sensitivity of receptor

- 6.334 As per paragraph 6.253, the **sensitivity** of the receptor is assessed as **low**.

Significance of effect

- 6.335 Overall, the magnitude of cumulative impact is assessed as low (neutral), and the sensitivity of the receptor is assessed as low. The overall effect of the operational phase on community services is therefore assessed to be of **minor (neutral)** significance. This is not significant in EIA terms.

Open space

Magnitude of impact

- 6.336 Those relevant committed developments that will create additional demand on open space through increasing the resident population will be expected to mitigate any potentially adverse effects

through being made subject to the same open space delivery standards as the Proposed Development.

- 6.337 Mitigation will either be included within scheme design, or supported through financial contributions. In this way, planning policy will determine that no overall net adverse impact will result from any single development, which will translate to the significance of potential cumulative impacts being assessed as neutral.
- 6.338 The **scale** of the cumulative impact is assessed as negligible, the **spatial extent** is considered to be local, the **duration** is anticipated to be long-term (permanent), and the **frequency** is expected to be continuous. The overall **magnitude** of potential cumulative impacts on open space is assessed as **negligible**.

Sensitivity of receptor

- 6.339 As per paragraph 6.271, the **sensitivity** of the receptor is assessed as **medium**.

Significance of effect

- 6.340 Overall, the magnitude of the cumulative impact is assessed as negligible, and the sensitivity of the receptor is assessed as medium. The overall effect of the operational phase on community services is therefore assessed to be of **negligible** significance. This is not significant in EIA terms.

SUMMARY

- 6.341 Overall, the Proposed Development is likely to have beneficial impacts in terms of the scope of the socio-economic assessment.
- 6.342 Beneficial effects which are significant in EIA terms are assessed in terms of new housing delivery and early years provision.
- 6.343 Beneficial effects which are not significant in EIA terms are also assessed in terms of construction phase employment and open space provision.
- 6.344 Adverse effects which are not significant in EIA terms are assessed with regards to primary education, and healthcare services. Following consideration of actionable mitigation measures, the residual effect on primary education, and healthcare services is assessed to be of negligible significance.
- 6.345 Following consideration of relevant cumulative projects, no adverse cumulative effects have been assessed with regards to socio-economic receptors.

TABLE 6.18 SUMMARY SIGNIFICANCE TABLE

EFFECT	RECEPTOR	SENSITIVITY	MAGNITUDE OF CHANGE	SIGNIFICANCE OF EFFECT	MITIGATION	RESIDUAL EFFECT
Construction phase						
Construction sector employment supported	Employment	Medium	Low (beneficial)	Minor (beneficial)	None required	Minor (beneficial)
Operation phase						
Increase in residential population	Population	High	Low (neutral)	Moderate (neutral)	None required	Moderate (neutral)
Increase in new housing delivery	Housing	High	High (beneficial)	Major (beneficial)	None required	Major (beneficial)
Education demand arising from early years pupil yield	Early years education	Medium	Medium (beneficial)	Moderate (beneficial)	None required	Moderate (beneficial)
Education demand arising from primary-age pupil yield	Primary education	Medium	Low (adverse)	Minor (adverse)	The developer will make a contribution via the appropriate mechanism, where required, in order to deliver the education infrastructure needed to support the Proposed Development	Negligible
Education demand arising from secondary-age pupil yield	Secondary education	Medium	Negligible	Negligible		Negligible
Education demand arising from post-16 pupil yield	Post-16 education	Medium	Negligible	Negligible		Negligible
Healthcare demand arising from increased residential population	Healthcare	Medium	Low (adverse)	Minor (adverse)	The developer will make a contribution via the appropriate mechanism in order to deliver the healthcare infrastructure	Negligible

					e needed to support the Proposed Development	
Community services demand arising from increased residential population	Community services	Low	Negligible	Negligible	None required	Negligible
Open space requirement arising from increased residential population	Open space	Medium	Low (beneficial)	Minor (beneficial)	None required	Minor (beneficial)

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7 Transport, accessibility and movement

- 7.1 This chapter, prepared by Paul Basham Associates, presents the findings of an assessment of the likely transport access effects of the Proposed Development.
- 7.2 This chapter provides a description of the baseline transport conditions, the assessment methodology applied, and the resultant forecast likely effects of the Proposed Development during the construction phase and operational phase. Mitigation (in the form of either inherent, standard or actionable) is identified (where appropriate) to avoid, reduce or offset any adverse effects identified and/or enhance likely beneficial effects. Taking account of the mitigation measures, the nature and significance of the likely residual effect are described.

LEGISLATIVE AND POLICY CONTEXT

- 7.3 The following guidance documents have been applied to inform this chapter:
- Design Manual for Roads and Bridges (DMRB) (various); and
 - Guidelines for the Environmental Assessment of Road Traffic – The Institute of Environmental Assessment (referred to as the 'IEMA Guidelines') July 2023.
- 7.4 The IEMA Guidance provides the following criteria for assessing the environmental impact of road traffic which are identified below.
- Severance of Communities (referred to as Severance);
 - Road Vehicle Driver and passenger Delay (referred to as 'Driver Delay');
 - Non-Motorised User (NMU) Delay (referred to as 'NMU Delay');
 - Non-Motorised User (NMU) Amenity (referred to as 'NMU Amenity');
 - Fear and Intimidation; and
 - Road Safety.
- 7.5 In addition, hazardous loads/large loads are included within the IEMA guidance. It is understood there will be no hazardous loads and any requirement of large loads at the construction stage will be appropriately covered within a Construction Traffic Management Plan which will be conditioned as part of the planning application.
- 7.6 There are a number of relevant planning policy documents, including:
- National Planning Policy Framework (NPPF), Ministry of Housing, Communities and Local Government (2024);
 - Wiltshire Core Strategy Wiltshire Council (2015);
 - Local Plan review (Reg 19) (released autumn 2023);
 - Wiltshire Local Transport Plan 2011 – 2026; and
 - Joint Melksham Neighbourhood Plan 2 2020-2038 (2025).

National Planning Policy Framework (NPPF)

- 7.7 The National Planning Policy Framework (NPPF), most recently updated in December 2024 sets out the Government's planning policies for England and how these are expected to be applied. Paragraph 10 of the NPPF sets out that there is a 'presumption in favour of sustainable development'.
- 7.8 The Framework also states that all developments that generate significant amounts of movement should be required to provide a travel plan and a transport statement or transport assessment so that the likely impacts of the proposals can be assessed (paragraph 118).

- 7.9 Paragraph 110 identifies that *“The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.”*
- 7.10 Paragraph 115 sets out the four transport ‘tests’ which need to be addressed when considering sites that may be allocated for development in plans. It should be ensured that:
- “a) Sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location ;*
b) Safe and suitable access to the site can be achieved for all users;
c) The design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and
d) Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.”
- 7.10.1 Paragraph 116 of the Framework states that *“should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.”*
- 7.11 Paragraph 117 of the Framework identifies that with regards to transport, the development should:
- *“Give priority first to pedestrian and cycle movements, both within the scheme and with the neighboring area; and second – so far as possible – to facilitate access to high quality public transport services, and appropriate facilities that encourage public transport use;*
 - *Address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*
 - *Create places that are safe, secure and attractive – which minimize the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*
 - *Allow for the efficient delivery of goods and access by service and emergency vehicles; and*
 - *Be designed to enable charging of plug in and other ultra-low emission vehicles in safe, accessible and convenient locations”.*

Wiltshire Core Strategy

- 7.12 The Wiltshire Core Strategy provides strategic planning policy for Wiltshire and covers the period up to 2026. The aim of the strategy is to deliver sustainable growth for the communities of Wiltshire that best needs their needs now and in the future.
- 7.13 Core Policy 60 of the strategy addresses sustainable transport and focusses on ways to reduce the need to travel by private car, and support and encourage the sustainable, safe and efficient movement of people and goods within and through Wiltshire. The policy seeks to achieve the following:
- *“Planning developments in accessible locations;*
 - *Promoting sustainable transport alternatives to the use of the private car;*
 - *Maintaining and selectively improving the local transport network in accordance with its functional importance and in partnership with other transport planning bodies, service providers and the business community;*
 - *Influencing the routing of freight within and through the county; and*

- *Assessing and where, necessary, mitigating the impact of developments on transport users, local communities and the environment”.*

7.14 Core Policy 61 focusses on transport and new development and states that:

“New development should be located and designed to reduce the need to travel particularly by private car, and to encourage the use of sustainable transport alternatives.”

7.15 Where appropriate, contributions will be sought towards sustainable transport improvements, and travel plans will be required to encourage the use of sustainable transport alternatives and more sustainable transport freight movements.

7.16 Core Policy 62 looks at development impacts on the transport network and states that all new development is required to assess the transport issues related to that development. The strategy also mentions the documents that developers will be required to submit to support an application, as follows:

“Where a development will have significant transport implications, the council will require a transport assessment to be prepared and submitted alongside a planning application in accordance with national guidance.”

“Developers will also be required to submit a travel plan with planning applications which are likely to have significant transport implications. The travel plan should aim to promote more sustainable forms of transport including, where relevant, more sustainable freight delivery and routing arrangements. The detailed requirements for travel plans will be set out in an additional planning guidance.”

7.17 Finally, Core Policy 62 states that “developments should provide appropriate mitigating measures to offset any adverse impacts on the transport network at both the construction and operational stages. Proposals for new development should not be accessed directly from the national primary network outside built-up areas, unless an over-riding need can be demonstrated.”

Wiltshire Local Plan review (pre-submission draft 2020-2038 - Regulation 19)]

7.18 Wiltshire is currently reviewing its Local Plan. The Wiltshire Council Local Plan Pre-Submission Draft 2020 – 2038 was submitted in September 2023 and provides an emerging vision for Melksham was subject to public consultation from September to November 2023. This document is underpinned by the Spatial Vision which includes the following;

“The management of growth will be based on a sustainable pattern of development, focused principally on Trowbridge, Chippenham and Sailsbury. Market town and local service centres will have become more self-contained and supported by the necessary infrastructure, with a consequent reduction on the need to travel. In all settlements there will be an improvement in accessibility to local services, a greater feeling of security and the enhancement of a sense of community and place”.

Wiltshire Local Transport Plan 3 (LTP3) 2011 – 2026

7.19 The LTP3 sets out the relevance of Wiltshire’s transport system across a wide range of services and describes how local outcomes will be achieved within the existing financial constraints. Priorities are focussed on economic recovery, road safety, road maintenance and addressing impacts on the built and natural environment, with a particular emphasis on the need to reduce carbon emissions.

7.20 The overarching vision for the LTP3 is as follows:

“To develop a transport system which helps support economic growth across Wiltshire’s communities, giving choice and opportunity for people to safely access essential services. Transport solutions will be sensitive to the built and natural environment, with a particular emphasis on the need to reduce carbon emissions”.

7.21 The following goals are directed at reducing carbon emissions throughout Wiltshire:

- SO2 - To provide, support and promote a choice of sustainable transport alternatives;

- SO11 - To reduce the level of air pollutant and climate change emissions from transport;
- SO13 - To reduce the need to travel, particularly by private car.

7.22 The priority for local transport, as set out in plan, is to encourage sustainable local travel and economic growth by making public transport and cycling and walking more attractive and effective, promoting lower carbon transport and tackling local road congestion.

Joint Melksham Neighbourhood Plan 2 (2020 – 2038)

7.23 The Melksham Neighbourhood Plan has been drawn up with the aim of ensuring that the growth of Melksham, and that the opportunities that this provides, are balanced with a clear understanding of the community's aims and aspirations for the future.

7.24 Policy 11 of the Neighbourhood focuses on sustainable transport and active travel. The policy states that:

"As appropriate to their scale, nature and location, development proposals should complement the Sustainable Transport Hierarchy, including provision for ultra-low emission vehicles. Proposals for major development should demonstrate through a proportionate Travel Plan how sustainable transport modes are maximised and that safe and suitable movement can be achieved for all people.

"As a key element in the local sustainable transport network, proposals that would achieve further improvements to the accessibility and quality of the links between the wider town and Melksham Railway Station will be supported. Improvements to the quality of the public realm around the station, will also be supported."

7.25 Therefore, development should provide opportunities to promote sustainable transport with priority given to pedestrians and cyclists, should create places that are safe, secure and attractive for all users, including those with disabilities, provide sufficient access for service, emergency and delivery vehicles, encourage plug-in and ultra-low vehicles through design and should only be prevented where the impact on highway safety is unacceptable or the residual impacts on the road network would be severe.

CONSULTATION

7.26 In order to ensure a robust worst-case assessment, a number of assumptions have been made regarding the application site. The principles of the assessment have been set out largely within the ES Chapter submitted as part of the live full planning application on the site (submitted under reference: PL/2024/10345). The assessment also follows practice undertaken by neighbouring sites of similar scale residential development (notably the consented Blackmore Farm application – reference PL/2023/01949) which has been accepted by WC Highways. It is on this basis that this assessment has been undertaken.

7.27 Therefore, we have identified that the Blackmore Farm application (PL/2023/01949) will be outlined as committed development and traffic surveys of the same junctions (where appropriate) have been undertaken in order to present a robust assessment and the Sandridge Common application (consented in 2016 under 15/12454/OUT) for the proposed distribution of traffic flows. The scope of assessment therefore mirrors that which was undertaken for the Blackmore Farm application and assessment parameters (in elements such as junction models for highway capacity) utilised where possible.

7.28 In terms of the inclusion of wider cumulative development, the majority of sites identified have been implemented and therefore form part of the baseline within the 2024 surveys, which have been factored to obtain a 2025 Baseline. Furthermore, the majority of identified sites are not within the immediate vicinity and therefore their traffic flow within the study area will have been picked up as part of the TEMPRO growth factors applied across the wider study area to uplift the wider baseline to the 2030 Forecast year. On this basis the only cumulative development site which has been manually applied and considered is the neighbouring application at Blackmore Farm.

ASSESSMENT METHODOLOGY

- 7.29 The topics assessed within this chapter follow the principles for determining the magnitude of impacts on sensitive receptors as set out in IEMA Guideline document, as set out later in this section, with reference made to DMRB, as appropriate. The resultant magnitude of impact and sensitivity of receptors are applied to determine the significance of the environmental effects.
- 7.30 This assessment considers the same traffic flows for the Proposed Development in the 18 hours traffic flows and 24 hours as it is considered reasonable to assume that resident movements are likely to occur between 08:00-09:00 and 17:00-18:00 as set out in the Transport Assessment.
- 7.31 This section sets out the methodology used for identifying the baseline conditions and assessing the likely traffic impacts of the proposed development. The IEMA has prepared 'Guidelines for the environmental Assessment of Road Traffic (Guidance Note No.1)'. This chapter fully assesses the environmental impact of the road traffic generated by the proposal in accordance with the criteria set out in this document. The method for each impact assessed is set out below.
- 7.32 The IEMA Guidelines suggest in paragraph 3.15 that two broad rules-of-thumb could be used as a screening process to delimit the scale and extent of the assessment. These are:
- Rule 1: include highway links where traffic flows will increase by more than 30% (or the number of heavy goods vehicles will increase by more than 30%).
 - Rule 2: include any other specifically sensitive areas where traffic flows have increased by 10% or more.
- 7.33 These rules-of-thumb form the starting point for the assessment of effects. The significance of the effects of the Proposed Development will be considered in respect of the following subject areas based on the IEMA Guidelines:
- 7.34 These rules-of-thumb form the starting point for the assessment of effects. The significance of the effects of the Proposed Development will be considered in respect of the following subject areas based on the IEMA Guidelines:
- Severance;
 - Driver Delay;
 - NMU Delay;
 - NMU Amenity;
 - Fear and Intimidation; and
 - Road Safety.
- 7.35 A Magnitude of Change Scale in respect of each of the IEMA guideline subject areas is defined in Table 7.1 below.

TABLE 7.1 MAGNITUDE OF IMPACT (BASED ON IEMA GUIDELINES)

CRITERIA	MAGNITUDE OF IMPACT			
	Negligible	Minor	Moderate	Major
Severance	< 30% increase in traffic flow or AADT < 8000	30% to 60% increase in traffic flow and AADT > 8000	60% to 90% increase in traffic flow and AADT > 8000	> 90% increase in traffic flow and AADT > 8000
Driver Delay	Increase in traffic flows by less than 5%	Increase in traffic flows by 5-15%	Increase in traffic flows by 15-30%	Increase in traffic flows by more than 30%

NMU Delay	Change in highway link traffic flow of less than 10%	Change in highway link traffic flow of 10% to less than 30%	Change in highway link traffic flow of 30% to less than 60%	Change in highway link traffic flow of over 60%
NMU Amenity	Change in highway link traffic flow of less than 10%	Change in highway link traffic flow of 10% to less than 30%	Change in highway link traffic flow of 30% to less than 60%	Change in highway link traffic flow of over 60%
Fear and Intimidation	No step change	A one-step change where: - average 18 hour traffic flow increase < 400 vehicles - total 18 hours HGVs traffic flow < 500 HGVs	A one-step change where: - average 18 hour traffic flow increase > 400 vehicles - total 18 hours HGVs flow > 500 HGVs	A two-step change in fear and intimidation
Road Safety	Change in traffic flow through junction of less than 5%	Change in traffic flow through junction of 5% to less than 10%	Change in highway link/junction traffic flow of 10% to less than 30%	Change in highway link/junction traffic flow of over 30%

7.36 A scale for sensitivity of the relevant receptors is identified in Table 7.2. The thresholds have been derived with reference to the IEMA Guidelines, best practice and professional judgment.

TABLE 7.2 VALUE/SENSITIVITY ASSESSMENT

	MAGNITUDE OF EFFECTS
High	Sensitive groups such as children and elderly Accident 'hot spots' Schools and town centres
Medium	Pedestrians on roads with no footways Pedestrians on roads with footways Cyclists Highway junctions operating close or over capacity Parks and recreational areas Retail areas
Low	Roads with active frontages Distributor roads
Negligible	Open space (agricultural land)

7.37 The predicted level of effect is based on the consideration of magnitude of impact and sensitivity of the resource/receptor to come to a professional judgement as to how important this effect is.

TABLE 7.3 MAGNITUDE OF IMPACT (BASED ON IEMA GUIDELINES)

Receptor Sensitivity	Magnitude of Impact			
	Negligible	Minor	Moderate	Major
High	Negligible	Moderate	Major	Major
Medium	Negligible	Minor	Moderate	Moderate
Low	Negligible	Minor	Minor	Moderate
Negligible	Negligible	Negligible	Negligible	Negligible

7.38 For the purposes of this assessment the level of impact is considered significant in circumstances when the overall magnitude of effect is moderate or above. In addition to the significance of the impact, the nature of the impact, being either beneficial, negligible, or adverse, has also been considered accordingly.

7.39 The above tables have been derived with reference to the IEMA Guidelines, such that locations in the study area that would experience an increase in traffic flow of 30% or more are considered in respect of Severance, and 10% or more are considered in respect of Non-Motorised User Delay and Amenity. With regards to Fear and Intimidation areas which would result in a step change in level in accordance with IEMA calculations are considered. In respect of accidents and safety, locations with a poor collision record are considered where they would experience an increase in traffic flow of 5% or more. In respect of Driver Delay, the corresponding figure is also >5%. Professional judgement has been exercised in determining the degree of the effect and whether or not mitigation in the form of an improvement to the existing road layout is required and, if required, what that improvement should comprise.

Traffic Impact Assessment

7.40 In accordance with committed development within Melksham and specifically referring to the Blackmore Farm application (Ref: PL/2023/01949), which received consent in May 2025 traffic flows have been obtained from surveys undertaken within February 2024 (prior to Easter Holidays) as the baseline.

7.41 The 2024 observed traffic flows will be used and have been factored up to 2025 baseline flows to determine the direct development impacts and requirement for mitigation at development year of opening. The factored 2025 traffic flows have been factored to represent the proposed opening year (2030) by applying TEMPRO growth rates which have been adjusted using the 'alternative assumptions' function to allow for committed developments. The committed developments which have been manually added to the proposed opening year are to create a 'Without Development' Scenario are:

- Land at Blackmore Farm, Sandridge Common (Reference: PL/2023/01949) – Outline permission for 650 dwellings

7.42 It should be noted the above planning application has been refused, however in order to present a robust assessment it is still considered appropriate to include as the primary source of committed development, in addition to the TEMPRO growth factors.

7.43 The IEMA Guidelines suggest thresholds on 18-hour daily flow, 18-hour HGV flow and vehicle speeds, as shown in Table 7.1

Accidents and Safety

7.44 The IEMA Guidance identifies that assessment of existing link road accident rates can be obtained from Highway Authority records and the assessment uses personal injury accident data for the most recently available five-year period (2020 – 2024) has been obtained from Wiltshire Council and reviewed.

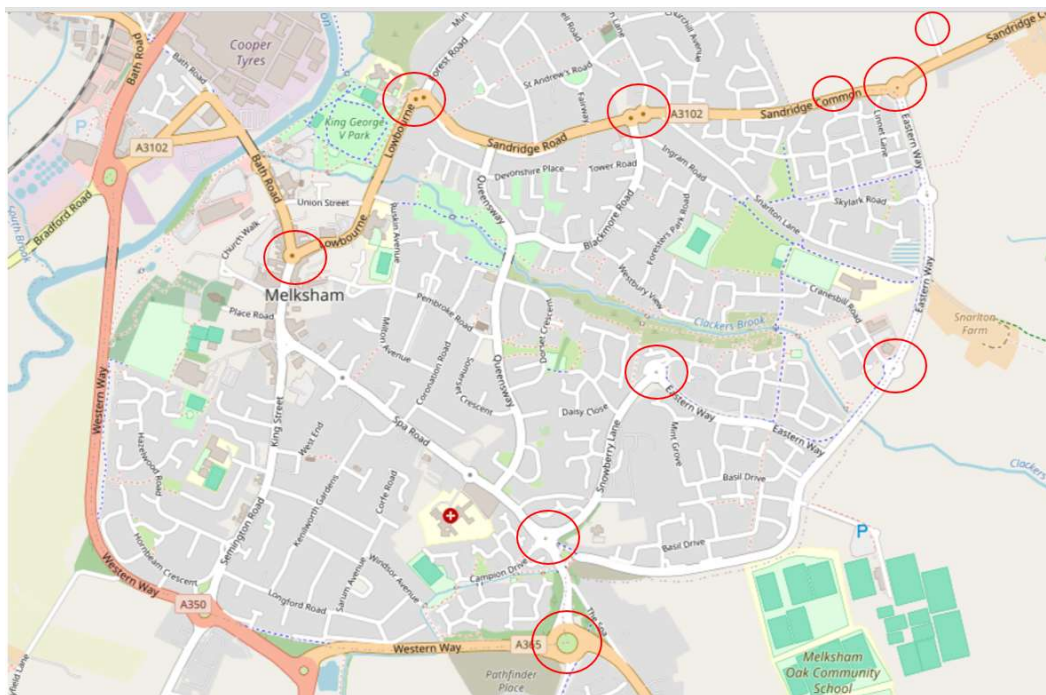
Assumptions, Exclusions and Limitations

- 7.45 For the purposes of this assessment, 2030 has been identified as the future year as the Proposed Development will be fully built out. Therefore, a phased assessment has not been deemed as necessary in this instance.
- 7.46 The Framework Travel Plan includes measures and initiatives to encourage walking, cycling and public transport rather than the use of vehicles to travel to and from the site. Therefore, no reduction or allowance of the travel planning measures are applied to the forecast traffic flows associated with Proposed Development. Therefore, it is considered the forecast traffic flows for the Proposed Development is considered to be reasonable for the purposes of this assessment.

STUDY AREA AND SCOPE

- 7.47 The overall study Area for the Transport Assessment (Appendix 7.1) and ES Transport chapter is shown in Figure 7.1 below.

FIGURE 7.1 MAP OF MCC AND ATC LOCATIONS



BASELINE CONDITIONS

Pedestrian and Cycle Facilities – Walking and Cycling

- 7.48 Along the site frontage, a footway flanks the southern side of Sandridge Common's carriageway. Within the vicinity of the site, this footway measures approximately between 3.2m and 1.5m wide as forms part of a shared footway and cycleway. The shared arrangement ends approximately 240m west of the A3102/ Eastern Way Roundabout at Fieldfare Way and the pedestrian footway continues to route west into Melksham.
- 7.49 As the footway continues to route west into Melksham Town Centre, it is equipped with features that help to make the walking environment safe and attractive including dropped kerbs, tactile paving and street lighting.
- 7.50 A pedestrian crossing facility, in the form of dropped kerbs and a pedestrian refuge point, is provided approximately 160m west of the site's western boundary enabling pedestrians to cross Sandridge Common safely.

- 7.51 There are no footways provided along the northern side of Sandridge Common's carriageway at the site frontage. Despite this, a footway is provided along the northern side of the carriageway approximately 100m west of the site's western boundary which routes into the Gladstone Road Development rather than along Sandridge Common.
- 7.52 An extensive PROW network is available surrounding the proposed site. These routes provide an alternative connection into Melksham away from the main carriageways. The most notable PROW in the vicinity of the site include:
- Footpath MELK103 and MELK104 – MELK103 runs to the south of the site off Sandridge Common Road adjacent to Fieldfare Way that ties into MELK104 just north of Skylark Road;
 - Footpath MELW27 – is located to the east of Eastern Way close to Blackmore Farm and connects to MELW26 adjacent to Blackmore Farm.

Public Transport Network

- 7.53 The closest bus stops to the site are located approximately 400m west of the proposed site access entitled 'Sandridge Garage'. This bus stop facilities access to the X76 service which facilitates travel to Bath to the west of the site and Marlborough via Calne to the east.
- 7.54 The closest bus stop to the site from the proposed site access is the 'Skylark Road' bus stop, located on the southern side of Skylark Road, circa 330m (4 minute walk) south of the development. This stop provides a circular shuttle bus which runs into Melksham and back by Services 14 and 15, run by Frome Bus, however, it should be noted this is only a request stop at certain times. Furthermore, the X76 service, a once daily route to/from Bath, is available from Sandridge Garage, c. 400m to the west. Additional bus services are also available from the 'Ingram Road' stop located along Blackmore Road circa 750m west of the site. Details of these services are explored in more detail within the Transport Assessment (Appendix 7.1).
- 7.55 As part of the consented Blackmore Farm application, it is proposed that two high quality bus stops will be provided along Sandridge Common to the east of our site. Additionally, and as proposed as part of the full planning application, two additional bus stops are proposed to be located along Sandridge Common to the west of the existing roundabout.

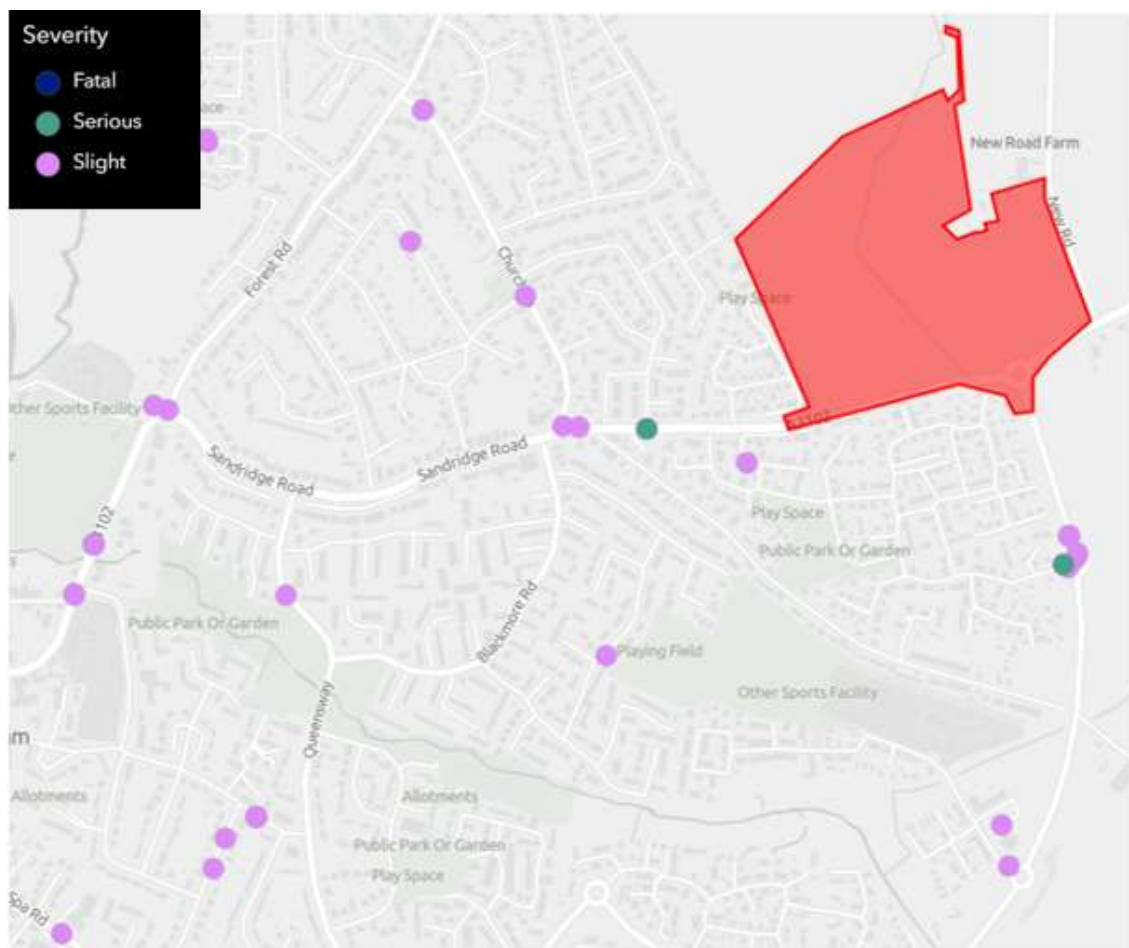
Local Highway Network

- 7.56 The site is well connected to the local highway network. Sandridge Common is a single lane carriageway road measuring approximately 6m in width with a shared footway/cycleway along the southern side of the carriageway which continue into Melksham town centre. Within the vicinity of the site, a 40mph speed limit is in place along Sandridge Common with a 30mph limit introduced approximately 90m west of the site's western boundary.
- 7.57 The A3102 Sandridge Common Road continues east of the proposed site access and meets a 3-arm roundabout with Eastern Way. Eastern Way is a single carriageway road of circa 7.3m width that routes around the eastern periphery of Melksham. The road is subject to a 40mph speed limit and street lighting is present along its extent. Eastern Way connects to Snowberry Lane which connects to Spa Road via a 4-arm roundabout, which in turn connects to Western Way and the A350 to the southwest.

Personal Injury Accident (PIA) Data

- 7.58 PIA data has been obtained from Crashmap for the latest 5-year period between 2018 – 2022 and has been analysed within the Transport Assessment. The study area for accident analysis is shown on Figure 7.2:

FIGURE 7.2 PERSONAL INJURY ACCIDENT (PIA) DATA FOR THE SITE



- 7.59 From looking at Figure 7.2 above, there are incident clusters noted at the Church Lane/Sandridge Common Road mini roundabout, at the Forest Road/ Lowbourne double mini-roundabout and at the Skylark Road/Eastern Way roundabout.
- 7.60 Upon a closer inspection of the incidents that have occurred at the Church Lane/Sandridge Common Road mini roundabout, 3 incidents have occurred within the last 5 year period, with the 2 that occurred on the roundabout classified as 'slight' in nature and 1 incident classified as 'serious', although this did not occur on the mini roundabout. One incident involved a pedestrian and the other involved 2 cars with one casualty. However, it is noted that these incidents were classified as 'slight' in nature and these isolated incidents do not suggest that there are any patterns in the frequency or distribution of incidents and therefore the development proposals will result in a negligible impact upon the operation of the local road network.
- 7.61 Regarding the incident cluster at the Forest Road/Lowbourne double mini-roundabout, both incidents were classified as 'slight' in nature with one incident involving a pedal cyclist and the other involved 2 cars with 1 casualty.
- 7.62 The cluster of incident around the Eastern Way/Skylark Road roundabout, 5 incidents have occurred in this location with 4 classified as 'slight' and 1 classified as 'serious' in nature. The serious incident involved a pedal cyclist and a vehicle occupant, with 3 of the 'slight' incidents involving 1 casualty and the last collision involved 3 vehicles and 3 casualties.

Existing Traffic Flows

7.63 The base year traffic flows, referred to as the '2025 Base', on the local highway network within the study area shown in Table 7.4. The traffic flows are identified from the ATCs undertaken in February 2024 and have been factored up to a 2025 Baseline.

TABLE 7.4 2025 BASELINE TRAFFIC FLOWS

LINK LOCATION AND DESCRIPTION	2025 BASELINE FLOWS	TOTAL HGVS	HGV %
Sandridge Common (West of Rbt)	7976	453	6%
New Road	1811	271	15%
Sandridge Common (East of Rbt)	3798	24	1%
Eastern Way (South of Skylark Rd)	4900	102	2%
Snowberry Lane	5197	93	2%
Spa Road (South)	8415	122	1%
Spa Road (North)	5485	20	0%
Sandridge Common (West of Blackmore Rd)	3325	54	2%
Lowbourne	4954	54	1%
Bank Street	4856	44	1%
High Street	4027	20	0%
Western Way	7494	195	3%
Bath Road	5919	117	2%

7.64 Further details of the baseline conditions can be found within the Transport Assessment (Appendix 7.1).

Future Baseline

7.65 The IEA guidelines state that the greatest environmental change will generally be when the Development traffic is at the largest proportion of total flow. IEA therefore recommends that environmental assessment should be undertaken at the year of opening of the Development. The opening year for the proposed development is assumed to be 2030 with all occupations completed for robustness and to align with the traffic forecast scenarios set out within the Transport Assessment (Appendix 7.1).

7.66 The annual average daily traffic (AADT) flows on the local highway network in 2030 on the main highway links are summarised in Table 7.5 below. The 2030 baseline traffic flows include committed development fully built out.

TABLE 7.5 2030 BASELINE PLUS COMMITTED DEVELOPMENT TRAFFIC FLOWS

LINK LOCATION AND DESCRIPTION	AADT 2-WAY	AADT HGVS	HGV%
Sandridge Common (West of Rbt)	10941	479	4%
New Road	2435	287	12%
Sandridge Common (East of Rbt)	4536	26	1%
Eastern Way (South of Skylark Rd)	5885	108	2%
Snowberry Lane	5496	98	2%
Spa Road (South)	9560	129	1%
Spa Road (North)	6462	21	0%
Sandridge Common (West of Blackmore Rd)	4917	57	1%
Lowbourne	6639	57	1%
Bank Street	5742	46	1%
High Street	4258	21	0%
Western Way	8175	206	3%
Bath Road	6295	124	2%

7.67 Further details are provided in the Transport Assessment (Appendix 7.1).

ASSESSMENT OF ENVIRONMENTAL IMPACTS

Construction Phase

7.68 The construction period for the residential units is likely to take approximately seven years based on up to 50 completions per year, although this is dependent on market conditions.

7.69 Working periods are expected to be 07:30 to 18:00 Monday to Friday and 07:30 to 13:00 on Saturdays. Deliveries will be made on weekdays only and it is expected that 1.5 construction workers will arrive and depart the application site in each staff vehicle. This car share assumption is robust because there is likely to be much higher car occupancy, with construction workers arriving in multi-occupancy vehicles.

7.70 During the busiest period of construction (assumed to be circa 50 dwelling completions in a year), it is predicted that there will be some circa 200 two-way vehicle movements per day (Consisting of 150 cars/vans and 50 HGVS).

It should be noted that the majority of construction staff will commence work at 07:30 and therefore workers will be travelling to the site outside the network morning peak hour when the greatest

traffic flows occur on the local highway network. Vehicles associated with construction are likely to depart throughout the day once a particular job has been completed, or at the end of the day. Therefore, it is not anticipated that all construction traffic would leave during the evening peak period.

7.71 The IEA guidelines recommend that highway links should be separately assessed when:

- Traffic flows have increased by more than 30% (or the number of HGVs will increase by more than 30%); or
- Other sensitive areas are affected by traffic increases of at least 10%.

7.72 Construction traffic will be routed wherever possible via the strategic and primary road network, with all traffic arriving and departing the site via the A3102 Sandridge Common Road. The 2029 plus committed development daily traffic flows (set out in Table 7.5) are around 10,000 vehicles and 450 HGVs. The total anticipated construction traffic equates to a circa 1% increase while HGV traffic flows would temporarily increase by 11%. On this basis, the predicted increases in flow will not exceed the above thresholds and, as such, the construction period of the proposed development would have negligible effects.

7.73 The construction of the proposed development is not expected to involve the transfer of hazardous loads to or from the application site. The effect of the proposed development during the construction phase will therefore be negligible.

Operational Phase

7.74 Future baseline flows have been forecast by taking the 2024 survey year and factoring it up to a baseline year of 2025 using TEMPRO growth factors, to then factor up to a future baseline of 2030. These TEMPRO Growth Factors are set out within the TA.

7.75 The need to include committed development traffic was reviewed through discussions with Wiltshire Council at the scoping stage as part of the full planning application and it committed development therefore comprises the application at Blackmore Farm. All other cumulative sites are considered to not directly effect the study area and their implementation is considered to have been captured through the 2024 baseline surveys whilst further residual growth would be captured through application of the TEMPRO Growth Factors.

Future Year 2030

7.76 This 2030 forecast scenario was used for the comparison of traffic impact 'with' and 'without' development, with the detailed methodology set out within the TA. In summary the following scenarios have been considered as part of the assessment:

1. Scenario 1: 2025 Baseline;
2. Scenario 2: 2030 Forecast (including Committed Development); and
3. Scenario 3: 2030 Forecast plus Proposed Development.

7.77 The trip generation of the Proposed Development (which is based on the illustrative layout which identifies 295 dwellings and a 100 place children's nursery) for the morning and evening peak hours is set out in the Transport Assessment. Note that it is assumed that the nursery is self-serving for the development and will not generate any material number of trips from outside the proposed development, a position set out within the pre-app scoping to Wiltshire Council.

7.78 The resulting traffic generation of the Proposed Development (AADT two-way traffic flows) are summarised in Table 7.6 below.

TABLE 7.6 PROPOSED DEVELOPMENT TRIPS

LINK LOCATION AND DESCRIPTION	SCENARIO 2: 2030 FORECAST + COMMITTED DEV	DEVELOPMENT TRIPS (AADT)	SCENARIO 3: 2030 FORECAST + COMMITTED & PROPOSED DEV	% DIFFERENCE
Sandridge Common (West of Rbt)	10941	317	11258	3%
New Road	2435	151	2586	6%
Sandridge Common (East of Rbt)	4536	166	4702	4%
Eastern Way (South of Skylark Rd)	5885	573	6458	9%
Snowberry Lane	5496	121	5616	2%
Spa Road (South)	9560	573	10134	6%
Spa Road (North)	6462	0	6462	0%
Sandridge Common (West of Blackmore Rd)	4917	347	5265	7%
Lowbourne	6639	347	6986	5%
Bank Street	5742	196	5938	3%
High Street	4258	151	4409	3%
Western Way	8175	422	8598	5%
Bath Road	6295	143	6438	2%
Rocket Road	-	453	-	-

7.79 The future year 2030 plus committed development with development traffic flows in the study area are shown in Table 7.6 above, with the percentage effect summarised in the same aforementioned table.

Driver Delay

7.80 As can be seen from Table 7.6 above, due to the trips dissipating across the network away from the site, the majority of links and junctions will experience a less than 5% increase in trips. Therefore based on the information available it is unlikely that the impact on these links and junctions will amount to anything other than **negligible**.

7.81 The exceptions to this are the Eastern Way link, New Road, Sandridge Common (West of Blackmore Road), Spa Road (South), Lowbourne Road and Western Way which experience between 9-5%

impact respectively. The impacts at these junctions are considered to be minimal in accordance with the percentage thresholds set out in Table 7.1 above. It is also noted that these junctions accommodate large levels of existing residential trips at present and therefore any increase in driver delay will be minimal. This impact will also be offset partially by the completion of Rocket Road to the south-east of the site.

- 7.82 To support this assertion, junction capacity modelling has been undertaken at a number of junctions which are detailed within the Transport Assessment (Appendix 7.1). The junction modelling identified no significant adverse impacts to junction performance.
- 7.83 The one exception to this is the Church Lane/Blackmore Road double mini roundabout. As part of the junction modelling undertaken it was determined that the Church Lane/Blackmore Road double mini roundabout would perform over practical reserve capacity in the future forecast scenario without the Proposed Development with a maximum RFC of 1.00 in the AM peak hour. Once the Proposed Development is included, the maximum RFC is forecast to increase to 1.16 in the AM peak hour. It is noted the PM peak hour is forecast to remain under capacity. Mitigation was considered at the Church Lane/Blackmore Road double mini roundabout as part of the live full planning application, in the form of revising the junction type to two priority T-junctions, which while this better reflects the balance of the traffic flows through the junction, WC highways stated that they would rather have contributions towards walking, cycling and public transport contributions.
- 7.84 Therefore, noting the Blackmore Road/Church Lane double mini roundabout will remain as existing, the impact on links and junctions within Melksham is considered to be **minor adverse** and will be mitigated further by the sustainable travel contributions secured .

Severance

- 7.85 The maximum percentage increase, as set out in Table 7.6 above, totals 11% on Eastern Way. All other links will experience less than 11% increase in trips. According to the IEMA guidance an increase of less than 30% in traffic will result in a negligible impact on Severance. On this basis the impact will be **Negligible**.

NMU Delay and Amenity

- 7.86 As can be seen from Table 7.6 above, due to the trips dissipating across the network away from the site, the majority of links and junctions will experience a less than 10% increase in trips. Therefore the impact on NMU delay and amenity at these links will be **negligible**.
- 7.87 The only exception is along Eastern Way, where the percentage impact totals 11% and therefore NMU delay and amenity will result in a **minor adverse** impact. In order to mitigate impacts surrounding the site access and the Eastern Way a new LTN 1/20 compliant crossing is to be delivered to aid the connectivity of the site to wider connections for non-motorised users. This will be supported by internal site connections including a segregated footway/cycleway to enhance connections and offset from the carriageway where possible to minimise impact on NMU amenity.

Fear/Intimidation

- 7.88 Upon review of the IEMA guidance, no stepped change will occur as a result of the development, with no material increases in trips expected to occur that results in significant additional average 18-hour trips or daily HGV numbers. On this basis and in accordance with Table 7.1 the impact of the development on Fear and Intimidation will be **negligible**.

Accidents and Safety

- 7.89 Table 7.1 sets out the threshold for where potential road safety effects could be experienced, with less than 5% increase having a negligible impact, between 5-10% having a minor and 10-30% having a moderate impact. Furthermore Table 7.2 sets out the magnitude of receptors, with accidents hot

spots and town centres considered high, junctions close to capacity, or areas with cyclists and pedestrians medium and distributor roads considered low.

- 7.90 No links experience a greater than 10% increase. The link with the highest percentage increase is Eastern Way which totals 9%. This equates to a minor impact. Eastern Way acts as a distributor road and typically is without active frontages and has segregated pedestrian and cyclist facilities. On this basis the receptor value is considered low and therefore in accordance with Table 7.3 the overall impact on Eastern Way will be **minor adverse**.
- 7.91 Following on from Eastern Way, Spa Road and Western Way also experience increases of 6% and 5% respectively. As with Eastern Way, these roads are distributor roads and typically are without active frontages and have segregated pedestrian and cyclist facilities therefore the impact is **minor adverse**.
- 7.92 To the north east on New Road, the percentage impact totals 6% of trips which will then equate to a minor impact. New Road has limited active frontage and is therefore considered that the impact will be **minor adverse**. The potential to provide traffic calming measures has been explored as part of the TA and concluded as not necessary.
- 7.93 Based on Sandridge Road East of the roundabout being a distributor road with little active frontage then it is considered the overall impact will also be **minor adverse**.
- 7.94 To the west of the site access along Sandridge Common and Lowbourn towards Melksham town centre it is acknowledged that the total impact equates to 7% at Sandridge Common and 5% at Lowbourn, reducing below 5% towards Melksham Town Centre. The receptors along this route vary and include areas of residential frontage and high levels of pedestrians and cyclists. On this basis the receptor value would equate to medium. Therefore, in reference to Table 7.3 the overall impact is expected to be **minor adverse**. On this basis no mitigation is considered necessary beyond that already proposed in response to other effects.

ACTIONABLE MITIGATION

Construction Phase

- 7.95 A CEMP will be prepared by the Applicant, approved by Wiltshire Council prior to construction commencing, and implemented by all contractors associated with the Proposed Development. The CEMP will confirm the hours of operation, and vehicle routes to be used by all HGVs travelling to/from the application site. Specific mitigation which will be included within the CEMP and is expected to include the following:
- Identification of delivery routes for HGVs as outlined in the CTMP, which are to be agreed with Wiltshire Council as the local highway authority;
 - Prohibition of HGV movements through Melksham centre, unless no alternative is available and only once an agreement has been sought with WC as the local highway authority.
 - The management of working hours and delivery times to minimise disturbance caused by Traffic (e.g. avoiding deliveries during peak hours);
 - Covering loads coming to and leaving the Development;
 - Provision of wheel washing/ vehicle cleaning facilities on site; and
 - Inspection of local highway network and cleaning as necessary.
- 7.96 The Construction Period of the Proposed Development is anticipated to have a **negligible** effect on all links within the study area.

Operational Phase

- 7.97 The transport vision for the development is to provide safe and convenient pedestrian, cycle and vehicular access, both within the site, to local and new bus stops and to provide onward connectivity

to Melksham town Centre and Station. The strategy will deliver options for travel via sustainable means.

Vehicular Access

7.98 The vehicular access strategy comprises the following elements:

- Main site access via an additional roundabout arm off the Sandridge Common Road/Eastern Way roundabout that will be re-designed as part of the proposals; and
- Emergency access via a 3.7m site access junction with A3102 Sandridge Common Road (west of the aforementioned roundabout).

7.99 Details and accompanying drawings of the access proposals are contained within the Transport Assessment (Appendix 7.1).

7.100 Vehicular access has been designed in line with guidance in Manual for Streets and the Design Manual for Bridges (DMRB) CD116 Geometric Design of Roundabouts and CD123 Geometric Design of at grade priority and signal-controlled junctions. The roundabout site access has been designed as a compact roundabout and allows for the swept paths of HGVs and to enable buses to enter and leave the site.

Walking and Cycling Access and Connectivity

7.101 As part of the walking and cycling strategy a new LTN 1/20 compliant crossing over Sandridge Common is to be delivered to aid the connectivity of the site to wider connections for non-motorised users. Further improvements will be considered as part of the future WCHAR.

7.102 Internal to the site a variety of pedestrian and cycle connections including a segregated footway/cycleway will be provided to enhance connectivity.

7.103 Furthermore, two signalised pedestrian crossing points are proposed as part of the development proposals, one located adjacent to the emergency access and the other located approximately 80m east of the roundabout that will facilitate access to the bus stops proposed as part of the consented Blackmore Farm application.

Travel Plan

7.104 It is noted that the implementation of a Travel Plan (Appendix 7.2) during the opening 5 years of the Proposed Development will be conditioned as part of any planning approval gained. It is anticipated that the Framework TP will assist with the management of travel demand as a result of the Proposed Development, with a key objective to reduce single occupancy vehicle movements by circa 10% to/from the site in favour of increasing walking, cycling and public transport journeys. The Framework TP is intended to be a 'live' document which is reactive to changes in travel demand and is reviewed on an annual basis. Therefore, the Framework TP will be flexible to respond to changes in travel demand and measures implemented to mitigate vehicle movements to/from the site.

7.105 The Proposed Development includes a package of measures to promote and encourage walking and cycling as well as public transport use rather than the use of vehicles via the measures outlined below:

- Travel Plan Coordinator;
- Residents Travel Information Packs;
- Promote Connecting Wiltshire and provide information on sustainable travel opportunities to/from the site;
- Promote bikeability training;
- A £300 cycle voucher for the first occupant of each household;
- Promote car sharing schemes; and

- Electric Car Charging.

CUMULATIVE IMPACTS

7.106 The cumulative analysis/impacts are already taken into account in the analysis presented above. Therefore the cumulative impacts of developments within Melksham have already been accounted for within the assessment and do not require further assessment within this section.

RESIDUAL IMPACTS

Construction Phase

7.107 Without mitigation, the construction phase of development is assessed to have a **negligible** impact on the following assessment area:

- Driver Delay;
- Pedestrian Delay;
- Pedestrian Amenity;
- Accidents and Safety
- Severance; and
- Fear and intimidation of road users and pedestrians.

7.108 While the expected impacts are **negligible**, mitigation (including amongst other things, wheel washing, dust management, specific vehicle routing, and controlled working hours) will be set out through a Construction Environmental Management Plan (CEMP), which will be secured via planning condition. In particular, this will ensure that delivery movements are managed to avoid peak times of day for pedestrians, cyclists and vehicular traffic. With this management in place there will be no construction phase impacts above negligible significance and as such no predicted significant residual impacts.

7.109 Overall, and in accordance with IEMA guidelines, it is concluded that the Proposed Development, with the implementation of the mitigation identified has no residual significant adverse environmental transport-related effects during either the construction or operational phases.

Operational Phase

7.110 Without mitigation, the operational phase of development is assessed to have a **negligible** impact upon the following assessment areas:

- Severance;
- NMU Delay;
- NMU Amenity; and
- Fear and Intimidation.

7.111 Without mitigation, the operational phase of development is assessed to have a predominantly minor adverse impact on the following assessment areas:

- Driver Delay; and
- Road Safety.

7.112 At this stage the only form of mitigation is proposed at the Church Lane/Blackmore Road double mini roundabout in order to address driver delay concerns at the junction, although the minor adverse at this junction is based on the percentage increase rather than the additional trips making an existing problem worse. This mitigation is expected to take the form alternative active travel

measures in the area. Specific details of this mitigation are set out within the accompanying Transport Assessment (Appendix 7.1). No further mitigation is proposed.

TABLE 7.7 SUMMARY SIGNIFICANCE TABLE

EFFECT	RECEPTOR	SENSITIVITY	MAGNITUDE OF CHANGE	SIGNIFICANCE OF EFFECT	MITIGATION	RESIDUAL EFFECT
NMU Delay and Amenity	Eastern Way	Low/Medium	Minor	Minor Adverse	Site Access roundabout incorporating LTN 1/20 compliant crossings to enhance wider connections	Negligible
Accidents and Safety	Eastern Way, Spa Road, Western Way, New Road, Lowbourne, Sandridge Common	Low/Medium	Minor	Minor Adverse	N/A	Minor Adverse

8 Biodiversity

INTRODUCTION

- 8.1 This chapter of the ES assesses the likely significant effects of the proposed development on the environment in respect of biodiversity and ecology.
- 8.2 This chapter has been prepared by GE Consulting, an established ecological and arboricultural consultancy based in the south-west. The chapter was prepared by Principal Ecologist Lindsay Taylor BSc MSc ACIEEM, an experienced ecologist with over 10 years' experience in the private consultancy sector. It was approved by Director Richard Pash BSc MCIEEM, who has over 15 years' experience. Richard is a full member of the Chartered Institute of Ecology and Environmental Management (CIEEM) and has prepared and reviewed numerous Ecological Impact Assessments, including ecology chapters for EIA. Survey work to support the chapter was led by a range of GE Consulting staff, all of whom are members of CIEEM.
- 8.3 This chapter describes how the proposed development is likely to affect the nature conservation and biodiversity value of the site and areas within the ecological 'Zone of Influence' (ZOI) by considering the value of ecological features in terms of wildlife legislation, national and local planning policies and intrinsic nature conservation value, and then assessing the environmental effects associated with the construction and operational phases. This chapter then identifies appropriate mitigation and enhancement measures with the overall aim of avoiding, minimising and compensating for any adverse impacts on biodiversity.

LEGISLATIVE AND POLICY FRAMEWORK

- 8.4 A full review of development plan documents relevant to Ecology issues has been undertaken to inform this assessment.
- 8.5 The assessment considers a range of national and local adopted and draft policies including:
- National Planning Policy Framework (NPPF), Ministry of Housing, Communities and Local Government (2023);
 - Planning Practice Guidance, Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government (2016, as updated);
 - Wiltshire Core Strategy, Wiltshire Council (2015);
 - Local Plan review (Reg 19) (released autumn 2023); and
 - Relevant legislation.

National Planning Policy Framework (NPPF)

- 8.6 The National Planning Policy Framework (NPPF)¹⁹ sets out the Government's planning policies for England and how local planning authorities should incorporate them into their own policies and plans. Chapter 15 of the NPPF contains several policies targeted at enhancing the natural environment and requires local authorities to consider how impacts on biodiversity can be minimised and provide net gains in biodiversity.
- 8.7 Paragraph 180 states that:

¹⁹ National Planning Policy Framework, (2023), Ministry of Housing Communities & Local Government

“Planning policies and decisions should contribute to and enhance the natural and local environment by:

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and

f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate

In addition, paragraph 185 (b) ensures that to protect and enhance biodiversity and geodiversity, plans should:

“b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.”

8.8 Additional Planning Practice Guidance (PPGs) supports the NPPF and includes guidance on:

- Landscape;
- Biodiversity, ecosystems and green infrastructure; and
- Brownfield land, soils and agricultural land.

Wiltshire Core Strategy

8.9 The Wiltshire Core Strategy is the overarching planning document for the County and was adopted in January 2015. Policies of relevance to this report include:

- Core Policy 50: Biodiversity and Geodiversity. This policy contains detailed measures to protect and enhance biodiversity, including protected/ sensitive wildlife species and protected sites such as Special Areas of Conservation (SACs)/Special Protection Areas (SPAs)/Ramsar Sites and Sites of Special Scientific Interest SSSIs, as well as the network of local wildlife sites within the county. Where appropriate, proposals should seek to conserve the local natural environment by retaining, protecting, enhancing and linking existing wildlife habitats; by incorporating retained habitats sensitively into the development through appropriate design; and by ensuring that such retained and enhanced habitats are managed appropriately. Where necessary, longer-term management will be achieved through suitable planning conditions.
- Core Policy 52: Green Infrastructure. This policy ensures that provisions for the retention and enhancement of Wiltshire's green infrastructure network are provided and ensures that suitable links to the network are provided and maintained.

8.10 Saved policies from the former West Wiltshire Local Plan 2004 (saved September 2007) and the West Wiltshire Leisure and Recreational DPD (adopted February 2009) of relevance to biodiversity include:

- Policy C40: Tree Planting - “In seeking to conserve the character and appearance of an area, trees of visual amenity value will be retained, particularly within conservation areas, and Tree Preservation Orders will be made to protect the important individual or groups of trees where appropriate.”
- Policy CR3: Greenspace Network – “The development of a greenspace network will be sought in and around the urban areas within the District. Development proposals will be permitted which extend and enhance existing riverside walks, recreational areas and fragmented habitats, and in addition, secure and maintain public access to the banks of rivers, canals and other habitats, where they will have no adverse impacts on wildlife. The establishment of Local Nature Reserves as part of the network will be addressed.”
- Policy GM2: Management and maintenance of new or enhanced open space – “Developers will be required to make arrangements for the long term management and maintenance of all new or enhanced provision resulting from development including management for wildlife.”

Joint Melksham Neighbourhood Plan 2 2020-2038

8.11 Policies of relevance to this project within the Joint Melksham Neighbourhood Plan 2 2020 – 2038 (made 2025) include:

- Policy 12: Green and Blue Infrastructure – “Development that will result in the creation of new Green Infrastructure (GBI) and/or contribute to the protection, management, enhancement and connectivity of existing GBI will be supported”
- Policy 13: Biodiversity – “Development proposals, including those for field based solar farms, will be expected to deliver at least a 10% improvement in “biodiversity value” within and, where appropriate, beyond the site in order to deliver tangible benefits for biodiversity, including specific attention for protected species.

Protection and enhancement of statutory and non-statutory nature conservation sites is a priority for the Neighbourhood Area and development proposals must demonstrate sensitive responses to these sites where necessary, such as accommodating a buffer zone.”

- Policy 17: Trees and Hedgerows – “Ancient and Veteran Trees: To be supported, development proposals should ensure that there will be no loss or deterioration of the irreplaceable habitats of ancient woodlands and ancient or veteran trees found outside ancient woodland, unless the need for and benefits of the development in that location clearly outweigh the loss. In accordance with current guidance a minimum buffer of at least 15 metres in width should be maintained between ancient woodland and any development boundary. A buffer zone around an ancient or veteran tree should be at least 15 times larger than the diameter of the tree.

Other Existing Trees and Hedgerows: To be supported, development proposals should ensure that there is no damage to or loss of trees of good arboricultural and amenity value. Existing trees and hedgerows on development sites should be retained where possible and incorporated as placemaking features in new development. Where there is an unavoidable loss of trees on site, the number and type of replacement trees should be informed by the quality and size of trees lost. Integration of existing hedgerows into private curtilage must be avoided where possible.

Increased Tree Canopy: “Wherever practicable, development proposals on sites outside of the town centre, and greater than 0.5 ha in size, should deliver an increase in site tree canopy cover.”

Legislative Context

8.12 This chapter takes into consideration the following pieces of legislation:

- The Conservation of Habitat and Species Regulations 2019 (which transposes the EC directive 92/43/EEC into UK Law);
- The Wildlife and Countryside Act (WCA) 1981 (as amended);
- Countryside and Rights of Way (CROW) Act 2000;

- Natural Environment and Rural Communities (NERC) Act 2006;
 - The Hedgerow Regulations 1997;
 - Protection of Badgers Act 1992;
 - The Environment Act 2021; and
 - Biodiversity 2020: A strategy for England's wildlife and ecosystem services.
- 8.13 The Wildlife and Countryside Act 1981 (as amended) (WCA) is the primary legislation covering endangered or threatened species in England and sets out the framework for the designation of SSSIs and SPAs.
- 8.14 The Conservation of Habitat and Species Regulations 2017 (as amended) (which transposes the EC directive 92/43/EEC into UK Law) actions the UK's implementation of the Habitats Directive, including the protection of European Protected Species and the designation of SACs.
- 8.15 The Protection of Badgers Act 1992 brings together all the legislation that is specific to badgers, with the exception of their inclusion on Schedule 6 of the WCA.
- 8.16 The Hedgerows Regulations 1997 aims to protect hedgerows of importance from destruction. The Regulations only apply to hedgerows growing on or adjacent to certain land use categories.
- 8.17 The Countryside and Rights of Way (CROW) Act 2000 affords a greater level of protection to SSSIs, provides better management arrangements for National Landscapes (previously Areas of Outstanding Natural Beauty) and strengthens wildlife enforcement legislation. Section 74(2) of the Act requires the Secretary of State to list those habitats and species of Principal Importance for the conservation of biodiversity, in accordance with the United Nations Convention of Biological Diversity 1992.
- 8.18 The Natural Environment and Rural Communities (NERC) Act 2006 is designed to help achieve a rich and diverse natural environment and thriving rural communities through modernised and simplified arrangements for delivering Government Policy. Elements of the act most relevant to the Development include (i) extension of the CROW biodiversity duty to public bodies and statutory undertakers to ensure due regard to the conservation of biodiversity; and (ii) modification of the CROW Act 2000 so that species listed under Section 74 are now listed under Section 41 of the NERC Act 2006. Priority Habitats and Priority Species for England (formerly listed in the superseded UK Biodiversity Action Plan) are detailed under Section 41.
- 8.19 The Environment Act 2021 operates as the UK's legal framework for environmental protection and provides legislation on environmental governance, principles, targets and improvement plans, waste and resource efficiency, nature protection, and water and air quality.
- 8.20 Part 6 of the Environment Act 2021 requires a minimum 10% biodiversity net gain for all new developments (with specified exemptions), and amends Schedule 7a (Biodiversity Gain in England) of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021) to mandate this in England. This applies to most major developments from 12th February 2024 and to small sites from 2 April 2024.
- 8.21 The biodiversity net gain regulations most directly relevant to planning are:
- The Environment Act 2021 (Commencement No. 8 and Transitional Provisions) Regulations (2024);
 - The Biodiversity Gain Requirements (Exemptions) Regulations (2024);
 - The Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations (2024); and
 - The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations (2024).
- 8.22 In addition, there are regulations for the Biodiversity Gain Site register established under section 100 of the Environment Act 2021 for registered off-site biodiversity gains.

POTENTIAL EFFECTS

This section summarises the likely potential effects of the proposed development on the important ecological features present at the site. These are likely to be:

- Killing/ injury of protected/ notable species;
- Loss of habitat, including foraging, commuting and resting habitats;
- Habitat fragmentation through severance or unmitigated lighting which could cause avoidance of established commuting routes;
- Disturbance to protected/ notable species through unmitigated lighting and/ or noise;
- Habitat degradation through construction activities or inappropriate management;
- Pollution incidents during construction and operation;
- Impacts to the local watercourse network, or flooding, through altered flow regimes and water quantity/ quality; and
- Recreational impacts to retained and newly created habitats.

ASSESSMENT METHODOLOGY

Overview

- 8.23 The purpose of this chapter of the ES is to identify and assess the likely significant effects of the proposed development in terms of Ecology and Nature Conservation. The assessment has been undertaken in accordance with the overarching methodology as described in chapter 2 which has then been adapted to the relevant ecological guidance set out in the Chartered Institute of Ecology and Environmental Management (CIEEM) Guidelines for Ecological Impact Assessment in the UK and Ireland²⁰.
- 8.24 This chapter describes the flora, fauna, habitats and designated sites on site and within the ecological Zone of Influence (Zoi) of the site. It then considers the value of these ecological features in terms of relevant wildlife legislation, national and local planning policies and intrinsic nature conservation value, and assesses the environmental effects associated with the construction and operational phases including inherent mitigation. This chapter then identifies appropriate additional mitigation and enhancement measures with the overall aim of avoiding, mitigating and compensating for any identified adverse impacts on protected and notable species and designated sites.

Defining the Baseline / Zoi

- 8.25 It is a requirement of Ecological Impact Assessment (Ecia) that the Zoi for a project is established. This is the area over which ecological features may be subject to significant effects as a result of the proposed project and associated activities. Therefore, the zone of influence can vary for different ecological features depending upon their sensitivity to environmental change (CIEEM, 2018).
- 8.26 The baseline for this assessment comprises the habitats, species and designated sites within the site plus those within the Zoi of the site and so the proposed development.
- 8.27 Prior to the assessment, potential effects arising from the proposed development and the area over which ecological features could be affected by these (i.e. initial Zois) were identified at a high level to inform the area over which survey or consideration was required. For example, designated sites

²⁰ Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine, version 1.2, (2018), CIEEM.

were considered over a wider area, although many of these do not have pathways for impacts so can be ruled out of the zone of influence.

- 8.28 The study area varies for each ecological receptor in accordance with receptor-specific best practice (CIEEM, 2019)
- 8.29 Given the nature of development and the species likely to occur, the ZoI for species and habitats is considered to be limited to the application site and immediately adjacent areas, with primary potential effects arising from habitat loss, fragmentation and harm to species present and utilising the site (i.e. bats). For species that are more mobile or more sensitive to disturbance, the same potential effects could occur but over a larger area and therefore the ZoI would extend further.
- 8.30 The pathways and impacts for designated sites from a development can occur over a further distance. The Zols that have been set for the ecological receptors are presented below:
- International statutory designations (10 km radius);
 - National statutory designations (2 km);
 - Non-statutory designated sites (2 km);
 - Bat foraging and commuting (4 km);
 - Habitats (the application site);
 - Roosting bats - Buildings, Trees and other features (the application site + 50 m);
 - Badgers (the application site + 30 m); and
 - Reptiles, Dormouse and Protected and Notable Flora (the application site).

Methodology for Defining Effects

Receptors and Receptor Sensitivity

- 8.31 In order to determine the appropriate approach to ecological survey and assessment work for the site, a list of potential ecological features was identified on the basis of:
- The statutory and non-statutory designated sites present in the ZoI, and their associated qualifying features/ species;
 - Habitats and species of conservation concern, including those of Principal Importance on the S41 List in England (HPI and SPI respectively), the Local Biodiversity Action Plan (LBAP) and Birds of Conservation Concern²¹ (BoCC)), which may be present on the site or in the surrounding area;
 - The local distribution of protected species in the area, for which the site may support suitable habitat.

Baseline Data Collection Methods

- 8.32 The paragraphs below briefly summarise the desk study/ ecological surveys that have been undertaken. Full methodologies are included within Appendix 8.1 – Ecological Baseline Report.
- 8.33 A desk study was carried out to obtain existing ecological information relating to the site and its surroundings, and comprised:
- A data search from the Wiltshire and Swindon Biological Records Centre (WSBRC) in December 2022 for protected/ notable species, designated sites and habitats within 2km of the site boundary (extended to 4km for bats);

²¹ The Status of Our Bird Populations: the Fifth Birds of Conservation Concern in the United Kingdom, Channel Island and Isle of Man and second IUCN Red List Assessment of Extinction Risk for Great Britain. British Birds 114: 723-747, (2021), Stanbury et al.

- Search of the government's online tool MAGIC for National Site Network sites within 10km of the site boundary, Priority Habitats within 1km and European Protected Species licences issued by Natural England within 2km.

8.34 The following field surveys have been undertaken during 2023 and 2024 to inform the proposed development design:

- A site walkover was undertaken in accordance with the UK Habitat Classification²² on 10th January 2023 and updated on 30th April 2024. The survey was extended to identify the potential for protected and notable species in accordance with CIEEM (2017). The main purpose of the survey was to assess the habitats for their potential to support protected/ notable species and to gain sufficient information to subsequently undertake a condition assessment following the criteria in the Natural England 'Biodiversity Metric 4.0 – Technical Supplement'²³, the relevant guidance at the time of survey (see Appendix 8.2).
- A badger survey was undertaken on 10th January 2023 and updated on 3rd June 2024 involving a thorough search of the site for evidence of badger activity based on the methodology outlined by Harris, Cresswell and Jefferies²⁴.
- Bat activity surveys involving manual transect surveys and automated detector surveys undertaken monthly between April 2023 and October 2023 in accordance with the best practice guidance²⁵ relevant at the time of surveying.
- Breeding bird surveys according to an adapted Common Bird Census (CBC) methodology²⁶ in April, May and June 2023.
- A dormouse nest tube survey was undertaken in accordance with The Dormouse Conservation Handbook²⁷ between April and October 2023. 50 dormouse tubes were deployed within suitable habitat throughout the site with three checks undertaken throughout the season.
- A riparian mammal survey was undertaken on 25th April 2023 and 6th September 2023. The survey involved a walkover of the tributary of the Avon and a survey of both riverbanks where accessible for the length of river running through the site. A detailed search was made along the river following current best practice methodologies for evidence of otter²⁸ and water vole^{29,30}.

Defining the Effect

8.35 The assessment has been undertaken in accordance with the guidance set out in the CIEEM Guidelines. The methodology used within this chapter varies slightly from that used within the other technical chapters in this ES. It has been prepared in accordance with the CIEEM Guidelines, and the potential effects of the proposed development on ecological features have been characterised, taking into account relevant aspects of ecosystem structure and function, according to the following terms: positive or negative; extent; magnitude; duration; frequency and timing; and reversibility.

8.36 The assessment of effects is based on the proposed development as described in ES chapter 3: The Proposed Development.

22 UK Habitat Classification Version 2, (2023), UKHab Ltd.

23 Biodiversity Metric 4.0 Technical Annex 1 Condition Assessment Sheets, (2023), Natural England

24 Surveying Badgers, (1991), S. Harris, P. Cresswell and D. Jefferies.

25 Bat Survey for Professional Ecologist: Good Practice Guideline (3rd Edition), (2016), J. Collins (ed.).

26 Bird Census Techniques (2nd edition), (2000), C.J Bibby et al.

27 Dormouse Conservation Handbook (2nd edition), (2006), P.W. Bright, P.A. Morris and A. Mitchell-Jones.

28 Nature Conservation Advice in Relation to Otters: Design Manual for Roads and Bridges Volume 10, (1999), Highways Agency.

29 The Water Vole Mitigation Handbook (The Mammal Society Mitigation Guidance Series), (2016), M. Dean, R. Strachan, D. Gow and R. Andrews.

30 Water Vole Conservation Handbook (3rd Edition), (2011), R. Strachan, T. Moorhouse and M. Gelling.

8.37 The value and sensitivity of ecological features was determined based on CIEEM. Individual ecological features were assigned levels of importance for nature conservation in a geographical context as set out in Table 8.1 below:

TABLE 8.1 CRITERIA FOR VALUING IMPORTANT ECOLOGICAL FEATURES

GEOGRAPHIC VALUE (SENSITIVITY)	DESCRIPTION
International or European	Statutory Sites designated or classified as part of a national site network comprising SACs and SPAs. Sites designated under international conventions for example Biosphere Reserves and Wetlands of International Importance (Ramsar Sites). Sites which support regular or significant populations of internationally important species.
National	Statutory Sites designated under national legislation for example SSSIs and National Nature Reserves (NNR). HPI and SPI listed under Section 41 of the NERC Act 2016. Species which are threatened or rare in the UK.
Regional	Local Nature Reserves (LNR), ancient woodland, species or species assemblages considered rare in the South West.
County	Sites meeting the criteria for county designations e.g. Non-statutory Local Wildlife Sites (LWS) or Sites of Interest to Nature Conservation (SINC). Notable species. Species or species assemblages considered rare in the county.
District	Sites/ species of value within this area of Wiltshire i.e. at a greater value than the local/ parish level, but not considered of county importance.
Local	Wiltshire Local BAP Priority Habitats and Species. Species and habitats that are not threatened but are valued at a local level.
Site	Species/ habitats of value within the context of the site's red line boundary only.
Negligible	No perceived ecological value.

8.38 CIEEM Guidance (CIEEM 2019) makes clear that the purpose of EcIA is to focus on potentially significant effects, rather than every ecological feature that may be affected by a proposed development. As such, effects that are not likely to be significant because, for example, the ecological feature is of low importance or sensitivity and/or the impact is of low magnitude or short term, are identified in the Baseline and Impact Assessment sections as appropriate, but not considered further.

8.39 Whilst the legal protection afforded to habitats and species does not necessarily reflect actual biodiversity value, the assessment methodology fully acknowledges statutory requirements, policy objectives, rarity, rate of decline and local or intrinsic nature conservation value.

8.40 The evaluation of the importance of bat populations is made with respect to criteria presented in Wray et al³¹, which provides guidance on how to value bat roosts, commuting routes and bat foraging habitat in ecological assessments. The paper offers a more quantitative approach than is available for most other taxa (through consideration of each species rarity).

³¹ Valuing Bats in Ecological Impact Assessment. In Practice 70:23-25, (2010), S. Wray, D. Wells, E. Long and T. Mitchell-Jones.

- 8.41 Features not meeting the criteria of this geographic frame of reference have been scoped out of the assessment as it was considered that impacts upon them were unlikely to be significant (in terms of legislation, policy or nature conservation value).

Impact Magnitude

- 8.42 For each phase of the proposed development (i.e. construction, operation, decommissioning (if required)) the magnitude of the likely significant impacts are identified and predicted as a deviation from the established baseline conditions.
- 8.43 Wherever possible, magnitude is determined on a quantitative basis. Magnitude is assessed using the five categories detailed in Table 8.2 below.

TABLE 8.2 CRITERIA FOR ASSESSING IMPACT MAGNITUDE

MAGNITUDE	CRITERIA
Major	Total loss or major/ substantial alterations to key features of the baseline (pre-development) conditions, such that the post-development character/ composition/ attributes will be fundamentally changed. <i>For example: 20% - 80% of population or habitat lost/gained</i>
Moderate	Gain/Loss or alterations to one or more key features of the baseline, such that the post-development character/ composition/ attributes of the baseline will be materially changed. <i>For example: 5% - 20% of population or habitat lost/gained</i>
Minor	A minor shift away from baseline conditions. Change arising from the loss/ alteration will be discernibly detectable but not material. The underlying character/ composition/ attributes of the baseline condition would be similar to the pre-development circumstances/ situation. <i>For example: 1% - 5% of population or habitat lost/gained</i>
Negligible	Very little change from baseline conditions. Change barely distinguishable, approximating to a 'no change' situation. <i>For example: <1% of population or habitat lost/gained or no change to the existing environment.</i>

Categorising Effects

- 8.44 An ecologically significant effect is defined by CIEEM (CIEEM, 2019) as an effect that either supports or undermines biodiversity conservation objectives for 'important ecological features' or for biodiversity in general. Conservation objectives may be specific (e.g. for a designated site) or broad (e.g. national/local nature conservation policy) or more wide-ranging (enhancement of biodiversity).
- 8.45 Effects can be considered significant at a wide range of scales. Significant impacts are those which disturb or alter the ecological receptor to a measurable degree. Significance is the impact characterisation or magnitude (as set out in Table 8.2) multiplied by the impact importance or sensitivity (as set out in Table 8.1) which equates to the significance (see Table 8.3).
- 8.46 When assessing the significance of effects, the following criteria have been considered:
- Positive or Negative: whether the impact benefits or detracts from the net biodiversity value of the feature, as measured by the baseline results;

- **Magnitude:** the 'size' or 'amount' of an impact, determined on a quantitative basis where possible, e.g. quantity of habitat to be lost;
- **Extent:** the physical extent of the impact, i.e. number of individuals affected or area of habitat lost (may be synonymous with magnitude);
- **Duration:** the measured time interval for the activity and likely duration of the impact upon the feature. The following categories have been used – temporary, short-term (0-5 years), medium-term (5-10 years), long-term (10 years +), permanent – in relation to ecological characteristics, e.g. species lifecycles, rather than human timeframes;
- **Reversibility:** whether the impact is reversible or not; and
- **Timing/Frequency:** whether constant or intermittent (stating the interval and variation in level of activity where possible), noting that some changes may only cause an impact if they coincide with critical life stages or seasons.

8.47 Significant effects upon the nature conservation features present within the area may arise either directly or indirectly, examples of which are given below:

- *Direct Effects:* Habitat loss, where the impact is related to the amount or quality of habitat available. Habitat fragmentation, where the impact includes severance of habitats and/or wildlife corridors linking them, which may lead to reduced genetic diversity and increase the likelihood of species being lost; and
- *Indirect Effects:* Disturbance, which may include visual, noise or vibration. Dust deposition, incidental vehicle trafficking, water discharges and surface runoff, which affect habitats both within and outside the footprint of the works.

8.48 To align the CIEEM guidance with the typical EIA terminology, the following conversions have been used to determine the magnitude of effect of the proposed development and to assess whether the impact was to be considered 'significant'.

TABLE 8.3 CRITERIA FOR ASSESSING IMPACTS ON ECOLOGICAL RECEPTORS

CRITERIA	MAGNITUDE	NATURE	SIGNIFICANCE
Positive effect on the status of ecological features of interest from regional to international level.	Major	Positive	Significant
Positive effect on the status of ecological features of interest at district to county level.	Moderate		
Positive effect on the status of ecological features of interest at local level.	Minor		
Positive effect on the status of ecological features of interest at Site level.	Minor	Positive	Not Significant
No noticeable effect on the status of ecological features of interest.	Negligible	N/A	
Negative effect on the status of ecological features of interest at Site level.	Minor	Adverse	
Negative effect on the status of ecological features of interest at local level.	Minor	Adverse	Significant
Negative effect on the status of	Moderate		

ecological features of interest at district to county level.			
Negative effect on the status of ecological features of interest at regional to international level.	Major		

- 8.49 As stated in the CIEEM guidelines “the scale of significance of an effect may not be the same as the geographic context in which the feature is considered important. For example, an effect on a species which is on a national list of species of principal importance for biodiversity may not have a significant effect on its national population”.

CUMULATIVE EFFECTS

- 8.50 Consideration is also given to any cumulative effects and the potential for impact avoidance or minimisation.
- 8.51 To assess the biodiversity effects of the proposed development in combination with other committed developments in the area on ecological features, a search radius of 3km from the site was considered appropriate. This includes major schemes that either have planning permission or are in the process of being implemented, as well as major planning applications which have been submitted and are likely to come forward.

Magnitude of Impact

- 8.52 Judgement of the magnitude of each potential impact has been based on the best available knowledge of the sensitivity, vulnerability, and recoverability of the habitat, species or assemblage being assessed.

Limitations and Assumptions

- 8.53 Care has been taken to ensure that balanced advice is provided on the information available and collected during the study period(s), and within the resources available for the project. However, the possibility of important ecological features being missed due to survey timings, absence during surveys or the year of survey cannot be ruled out. In addition, the lack of evidence or records of protected species on site does not preclude their presence from site. There were no major limitations to the data collection or subsequent analysis.
- 8.54 The Biodiversity Net Gain (BNG) assessment is based on a number of assumptions on the amount of habitat loss/ degradation, as detailed in Appendix 8.2.

BASELINE CONDITIONS

- 8.55 Detailed survey methodologies, results, indicative photographs and associated plans showing the distribution of habitats and protected and notable species are provided within Appendix 8.1. Summaries of results and a valuation of each identified Important Ecological Feature (IEF) are provided below.

Designated Sites

Statutory Designated Sites

- 8.56 There is one statutory internationally designated National Site Network site within 10km of the site. These designated sites are also covered by SSSI designations reflecting their importance at a national scale.

TABLE 8.4 STATUTORY DESIGNATED SITES WITHIN THE SITE'S ZONE OF INFLUENCE

SITE NAME	LOCATION	DESCRIPTION
Bath and Bradford-on-Avon Bats SAC	Nearest component Box Mine SSSI, c. 9.0km NW	Annex II species that are a primary reason for selection of this site: 1304 Greater horseshoe bat <i>Rhinolophus ferrumequinum</i> 1323 Bechstein's bat <i>Myotis bechsteinii</i> Annex II species present as a qualifying feature, but not a primary reason for site selection: 1303 Lesser horseshoe bat <i>Rhinolophus hipposideros</i>

Non-Statutory Designated Sites

- 8.57 The closest non-statutory designated site is Bristol Avon River LWS located approximately 1.15km west of the site. The LWS is one of the main river systems draining north-west Wiltshire.
- 8.58 A number of additional non-statutory designated sites are identified within 2km of the site but are not deemed relevant to the assessment as no significant effects are considered likely.

Habitats

- 8.59 The site largely comprises modified grassland fields with little to no margins, rotationally grazed by livestock. Fields are bound primarily by native hedgerows, some of which are associated with ditches and mature trees. A watercourse, a tributary of the River Avon, runs from south to north through the grassland fields in the centre of the site. New Road runs the length of the eastern boundary with a collection of farm buildings and residential property adjacent, and Sandridge Road runs the length of the southern boundary.
- 8.60 A brief description of each of the habitat types in the context of the site is provided below. Where specific features are referenced below the locations can be found in the Figures accompanying Appendix 8.1.

Hedgerows and Trees

- 8.61 The site is bound and divided by a network of species-rich and species-poor hedgerows many associated with ditches. The hedgerows were fairly uniform and similar in structure and species. Semi-mature standard trees (predominantly Lombardy poplar and ash) are present in H5 along the western boundary. Dominant hedgerow species included blackthorn, elm and hawthorn. Less frequently recorded species included willow species, field maple, rose species, honeysuckle, wild privet and dogwood, with some ornamental species also being recorded at H16, adjacent to the offsite residential properties. Ground flora generally consisted of common and widespread species such as nettle, ivy, cleavers and bramble with no ancient woodland indicator species present.
- 8.62 All hedgerows on site are HPI under the NERC Act 2006. The species-rich hedgerows are also a Wiltshire Biodiversity Action Plan (WBAP) habitat. None of the hedgerows on site qualify as 'Important' under the biodiversity and landscape criteria defined by the Hedgerow Regulations 1997 due to the lack of species diversity and connections to nearby woodlands and ponds. The majority of hedgerows are managed through regular and heavy flailing giving them a boxy and uniform structure.
- 8.63 A detailed condition assessment of each hedgerow has been used to assess the baseline biodiversity score for the site for a BNG assessment. All hedgerows were in 'Good' condition with the exception of one (H10) which is in 'Moderate' condition.

- 8.64 The site supports very few individual trees, i.e. those not encompassed within the 'hedgerow with trees' category:
- A single semi-mature pedunculate oak is present within H1 along the eastern boundary; and
 - A crack willow lies at the junction of H6 with the watercourse in the centre of the site.
- 8.65 Groups of native and ornamental trees, including blue atlas cedar, silver fir, common dogwood, holly, ash, apple, Lawsons cypress, Lombardy poplar and Monterey cypress lie adjacent to the site within the garden of the residential property at New Farm.
- 8.66 Despite the relatively heavy management of the hedgerows and the limited number of individual trees on site, they do form part of a wider network of similar habitats within the vicinity. As such, the hedgerows and trees on site are considered to be of **Local** importance.

Modified Grassland

- 8.67 Modified grassland makes up the majority of the site and is homologous in terms of structure and species composition having been subject to and improved by rotational cattle grazing. The grassland comprises a short sward dominated by perennial rye-grass with cock's-foot, creeping buttercup, white clover, cleavers, dandelion, ground-ivy, dead nettle and herb Robert. Other species recorded in the very narrow margins include cow parsley, a crane's-bill, lords and ladies, chickweed and common sorrel. The composition differs slightly directly adjacent to the watercourse, with species more commonly associated with riparian habitats, such as common reed and rushes however marshy grassland communities are absent in these areas.
- 8.68 This habitat type is common in the area and of low intrinsic ecological value. The modified grassland fields are of **Negligible** importance and have been scoped out of this assessment.

Watercourse

- 8.69 An un-named tributary of the River Avon bisects the site, flowing broadly south to north. This section of the watercourse is approximately 1m wide and very slow flowing, with shallow water and an earth/silty substrate. The banks are low, steep sloping and support coarse grasses grading to open pasture on both sides. The watercourse is fenced along its length within the site therefore no evidence of cattle poaching was present. No mature riparian vegetation is present.
- 8.70 The watercourse is an HPI and as such is considered to be of **District** importance.

Ditches

- 8.71 A series of small, seasonally wet surface water drainage ditches are present associated with hedgerows (H1, H3, H4, H6 H7 and H8). The ditches were generally narrow and overshadowed and were lacking diverse and aquatic flora. All ditches were wet at the time of the initial survey, however heavy rainfall in the days prior had resulted in flooding of several areas of the grassland therefore conditions were not indicative of a 'normal' baseline. Surveys for protected species were conducted throughout the season and the ditches were noted to be dry for the majority of that period, suggesting any level of permanence beyond periods of high rainfall was absent.
- 8.72 The ditches are considered to be of **Local** importance.

Notable Botanical Species

- 8.73 WSBRC returned 44 records of notable botanical species, however none were associated with the site or its adjacent habitats.

Invasive Plants

- 8.74 No invasive plant species listed on Schedule 9 of the WCA were recorded on the site.

Fauna

Amphibians

- 8.75 The desk study returned two records for great crested newt (GCN) from within 2km of the site over the last 10 years, distanced 1.15km and 1.35km southeast of the site.
- 8.76 No records were returned for common toad.
- 8.77 Two ponds lie within 250m of the site boundary (see Plate 1 for locations): P1, a SuDS pond for the neighbouring development, is directly adjacent to the western boundary; and P2 c. 245m to the southeast, appears to be a slurry pit associated with a farm on the southern side of the A3102.
- 8.78 Part of the site lies within the Amber Risk Zone for GCN³² of the Natural England District Licensing Scheme (see Figure 8.1 below). The amber zone appears to be associated with the two offsite ponds described above and shows a link between the two.

FIGURE 8.1 AMBER RISK ZONE (LIGHT BLUE) WITHIN THE SITE



- 8.79 There are no ponds present within the site boundary and the ditch network within the boundary is considered to be sub-optimal due to its seasonality. As such, it is considered that no suitable breeding habitat is present within the site boundary. The hedgerow and ditch network may provide suitable terrestrial habitat for amphibians, including GCN, however the availability of this habitat is limited. The grassland is not considered suitable as it is heavily grazed to a very short sward, with none of the structure or 'thatch' that would provide suitable resting/sheltering habitat present.
- 8.80 The site is considered to be of **Local** importance for common and widespread amphibian species.

Badgers

- 8.81 The desk study from WSBRC returned four records of badgers within 2km of the site, the closest being approximately 0.3 km south of the site boundary.
- 8.82 One potential badger sett was identified during the survey along the northern boundary hedgerow (H7). A single entrance was noted within the hedgerow itself meaning access to view the entrance

³² https://naturalengland-defra.opendata.arcgis.com/datasets/5bb28a562ffa45c68458e7013291ad6f_0/explore?location=51.378140%2C-2.112458%2C15.81

was limited by the dense hedgerow vegetation. No other entrances or signs of badger were noted, either within this hedgerow or anywhere else on site.

8.83 Signs of rabbit and fox were noted throughout the site, therefore it is possible that the entrance in H7 could also be attributed to these species rather than badgers. The limited access to the potential entrance, however, did not allow full inspection therefore, as a precaution, it is assumed to be badger.

8.84 The badger population is considered to be of **Local** importance, if present.

Bats - Roosting

8.85 A single tree on the site (T1) located within hedgerow H1 along the eastern boundary – see Appendix 8.1 Figure 1) was identified as having some potential (Low) to support roosting bats.

8.86 Given the intermittent use of trees by roosting bats, aerial inspections and/ or emergence/ re-entry surveys may be required as detailed proposals are developed. However, none of the features were considered likely to support a roost of conservation significance (e.g. maternity) and therefore the site is likely to be of no more than **Local** importance for roosting bats.

Bats – Commuting/ Foraging

Desk Study

8.87 WSBRC returned over 700 records of bats from within 4km of the site for the following species:

- Barbastelle (European Protected Species (EPS), SPI, Annex II species);
- Brown long-eared bat (EPS, SPI);
- Common pipistrelle (EPS);
- Daubenton's bat (EPS);
- Greater horseshoe bat (EPS, SPI, Annex II species);
- Lesser horseshoe bat (EPS, SPI, Annex II species);
- Long-eared bat species (EPS, SPI);
- Myotis bat species (EPS, unless Bechstein's bat which is EPS, SPI and Annex II);
- Natterer's bat (EPS);
- Noctule (EPS, SPI);
- Nyctalus species (EPS, SPI);
- Pipistrelle species (EPS);
- Serotine (EPS);
- Soprano pipistrelle (EPS, SPI); and
- Whiskered bat (EPS).

8.88 77 records of bat roosts were provided by WSBRC within 4km of the site these included roosts for the following species:

- Common pipistrelle (nearest 0.3km south);
- Daubenton's bat (nearest 2.2km southwest);
- Greater horseshoe bat (nearest 2.3km northeast);
- Lesser horseshoe bat (nearest 2.2km southwest);
- Long-eared species (nearest 0.9km south-east);
- Serotine (nearest 0.85km southwest);

- Soprano pipistrelle (nearest 0.85km southeast); and
- Whiskered bat (nearest 3km southwest).

Transect Survey Results

- 8.89 During the transect surveys, common pipistrelle was the most frequently recorded species, followed by soprano pipistrelle with infrequent passes from noctule. Annex II species were absent during the transect surveys.
- 8.90 Most bat passes were associated with field boundary hedgerows, although this is an expected spatial bias since transects largely followed field boundary hedgerows. Activity was homogenous across the site, with one hotspot of concentrated activity at the southern boundary of the site bordering Sandridge Road (Appendix 8.1 - Figure 2). This is most likely due to foraging opportunities presented by streetlighting to generalist and light tolerant species such as common pipistrelle, as evidenced by the aforementioned species' high number of overall passes in comparison to other recorded species.

Automated Detector Survey Results

- 8.91 Four further species in addition to the five species identified during the transect surveys were recorded during the automated detector surveys: lesser horseshoe, greater horseshoe, barbastelle and long-eared species.
- 8.92 During the automated detector surveys, a total of 28,465 passes were registered with common pipistrelle again being the most frequently recorded bat species (24,737 passes = 86.9%), followed by soprano pipistrelle (1,270 passes = 4.46%), noctule (1,250 passes = 4.39%) and *Myotis spp.* (949 passes = 3.33%), all of which were recorded in similar frequency. Serotine and long-eared species make up 0.36% (102 passes) and 0.31% (87 passes) respectively.
- 8.93 Annex II bats were recorded in very low numbers: lesser horseshoe bats and barbastelle at 0.12% and 0.11% respectively (35 and 30 registrations out of 28,465) and greater horseshoe bats at 0.02% (a total of 5 registrations out of 28,465).
- 8.94 Location 1 recorded the most overall passes; (22,557 passes = 79.24%) of all passes over the survey period. Common pipistrelle bats were recorded especially frequently here with 83.86% (20,746 passes) of all common pipistrelle calls recorded at this location.
- 8.95 Despite being recorded in very low numbers, all Annex II species were recorded at all locations (see Appendix 8.2 - Figure 2). Location 2 recorded the highest number of passes for both the woodland specialist barbastelle (60% of all barbastelle calls recorded) and light-averse lesser horseshoe bat (65.7% of all lesser horseshoe calls recorded). Greater horseshoe bats however showed greatest affinity to locations 1 and 3 with two passes recorded at each.

Summary

- 8.96 Surveys found at least nine species of bats using the hedgerows, trees and grassland habitats across the site for commuting and foraging. There is potential for different species of *Myotis* bats to have been recorded given the difficulty in identifying to species levels from sonogram analysis alone.
- 8.97 Given the relatively limited assemblage of bat species, low levels of activity on the site in the context of its geographic location and the sporadic use of the site by Annex II species, the site is considered to be of **Local** value to commuting and foraging bats.

Breeding Birds

- 8.98 WSBRC returned 131 records for birds within 2km of the site over the past ten years. This included species that could present on site such as red kite (WCA), swift (Red BoCC), house sparrow (SPI, Red BoCC), fieldfare (Red BoCC, WCA) and starling (Red BoCC). Some records were also returned for wetland birds, such as kingfisher and little egret, which are likely to be associated with the nearby Avon River. Whilst these species are regularly found near watercourses, the watercourse on site has

very little suitable vegetation and is unlikely to contain fish in any significant numbers and as such these species would be unlikely to use the site itself.

- 8.99 A total of 27 species were recorded during the breeding bird survey of the site. Of these, 12 were notable species (at least 5 Amber-listed BoCC , SPI, Local BAP or Schedule 1 WCA).
- 8.100 The majority of notable species recorded as possible and probable (no species were confirmed breeders) were recorded in association with hedgerows and grassland fields.
- 8.101 There were no ground nesting species recorded within the site due to the lack of suitable habitats given the short sward and regular disturbance throughout the site.
- 8.102 Despite supporting SPI and BoCC species, the species assemblage and numbers of birds recorded was low and the site is considered to be of **Local** importance to breeding birds.

Dormice

- 8.103 WSBRC returned four records for dormice within 2km of the site over the past ten years. The closest record was c. 0.5km southeast of the site boundary. No records older than 2021 were returned.
- 8.104 Two dormouse nests were found inside the dormouse tubes deployed on site, with one nest found on the northwest boundary hedgerow (H7) and one in an internal hedgerow in the southeastern section of the site (H3) (locations are detailed in Appendix 8.1 - Figure 1). This suggests that dormice are present on site and are utilising the native hedgerow network for foraging, breeding and commuting purposes.
- 8.105 The species is declining in the UK but relatively widespread in the southwest. Whilst Wiltshire, and the Melksham area in particular, are not considered to be a stronghold for the species, they have been found within 10km of the site with relative frequency. Therefore, the site is considered to be of **District** importance for this species.

Invertebrates

- 8.106 WSBRC returned 17 records of notable invertebrates within 2km of the site over the past ten years. None of these were associated with the site, however, riparian species such as the scarce chaser (RLGB near threatened) that make use of the nearby River Avon would have the potential to utilise the watercourse habitat found running through the arable fields on site.
- 8.107 Overall, the site's habitats with invertebrate interest detailed above were considered to be of **Site** importance to invertebrates.

Reptiles

- 8.108 The data search returned a single record for slow worm from within 2km of the site and none from the site itself. The fields are largely unsuitable for reptiles, however it is possible that a small population of common reptiles could be present within the hedgerows on the site, and there is low potential for grass snake along the watercourse if such a population exists within the area.
- 8.109 The site is considered to be of **Site** importance for reptiles, if present.

Riparian Mammals

- 8.110 The data search returned five records of otter within the past ten years, the nearest being approximately 0.67km east of the site. The majority of the records are associated with the River Avon proper, however the nearest record was a deceased specimen found on the A3102 (Sandridge Common).
- 8.111 The onsite watercourse and surface water drainage ditches provides very little suitable habitat for otter and would likely only be utilised by the species on an opportunistic basis during times of heavy spate.
- 8.112 In addition, no evidence of otter was found during surveys. The species is therefore considered to be absent from the site and have been scoped out of further assessment.

- 8.113 Twenty-one records were returned for water vole in total, with the closest being 0.5km south of the site. All were associated either with the River Avon proper or two large tributaries 1.1km to the north and 0.5km to the south of the site.
- 8.114 The onsite watercourse provides limited suitable habitat for water vole, with the vegetated banks providing thin cover and foraging vegetation. However, no evidence was found during surveys. The species is therefore considered to be absent from the site and have been scoped out of further assessment.

Hedgehogs

- 8.115 The data search returned over 300 records of hedgehog from within 2km of the site, with several records being adjacent to the site boundary. In addition, the site offers suitable foraging habitat within the grassland, as well as commuting and sheltering habitats within the hedgerows. Given its national decline over previous years, the site is considered to be of up to **Local** importance for this species.

Evaluation

- 8.116 A summary of the evaluation of ecological features, based on the CIEEM geographic frame of reference is presented in Table 8.5 below.
- 8.117 Features not meeting the criteria of the geographic frame of reference (e.g. those considered of 'Negligible' importance) have been scoped out and not taken forward within the assessment.

TABLE 8.5 EVALUATION OF ECOLOGICAL FEATURES

ECOLOGICAL FEATURE	GEOGRAPHIC IMPORTANCE
Statutory Designated Sites – Bath and Bradford-on-Avon Bats SAC	International
Non-Statutory Designated Sites	Local - County
Hedgerows and Trees	Local
Modified Grassland	Negligible
Watercourse	District
Ditches	Local
Amphibians	Local
Badger	Local
Bats – Roosting	Local
Bats – Commuting/ Foraging	Local
Breeding Birds	Local
Dormouse	District
Invertebrates	Site

Reptiles	Site
Otter	Negligible
Water vole	Negligible
Hedgehog	Local

Future Baseline

8.118 In the absence of the proposed development, the land within the site would remain subject to existing agricultural management practices with existing features likely to remain in-situ but their value and contribution to biodiversity gradually degraded through soil compaction/erosion, improvement through manure deposition and unsympathetic management of hedgerows.

INHERENT AND STANDARD MITIGATION

8.119 This section provides a summary of the mitigation measures required to avoid, reduce or remedy any adverse effects or enhance the beneficial aspects arising during the construction and operational phases of the proposed development. These measures will be taken into account when assessing the environmental impacts of the proposals in the following section.

8.120 Inherent mitigation measures are those that have been 'embedded' into the scheme as described in chapter 3, with the purpose of designing out potential impacts to important ecological features. Inherent mitigation measures include:

- Habitat retention through provision of landscape buffers along hedgerows and along the riparian corridor;
- Protection of retained hedgerow trees (taking RPAs into account) and the watercourse also through provision of landscape buffers;
- Habitat creation within new areas of POS;
- Protection of the potential badger sett via 20m buffer of no development designed into the POS;
- Surface water management through provision of SuDs and structural planting;
- Retention of suitable dormouse habitat (hedgerows) as part of the proposals and creation of new habitat as part of the landscaping proposals;
- Retention of bat commuting and foraging habitat through hedgerow retention and provision of landscape buffers.

8.121 Standard mitigation measures are those put in place to reduce/ remedy any impacts that cannot be inherently designed out but are commonplace as part of such development proposals. Standard mitigation measures include (but are not limited to) the following, which will be implemented via a Construction Environmental Management Plan (CEMP):

- Protection of retained habitats (hedgerows, grassland, watercourse/ riparian corridor) during construction via Heras fencing or similar;
- Protection of hedgerows and trees in accordance with an Arboricultural Method Statement following BS5837: 2012 and through the provisions of the CEMP;
- Supervision of habitat removal by Ecological Clerk of Works (ECow) where protected species may be affected; and
- Pollution control during construction to avoid run-off/ deposition into the watercourse.

ASSESSMENT OF ENVIRONMENTAL IMPACTS

Designated Sites

Statutory Designated Sites

Construction and Operational Phase Effects

- 8.122 The Bath and Bradford on Avon SAC lies approximately 9km to the north-west of the site and is designated for its populations of greater horseshoe and Bechstein's bats as the primary reason for designation, with lesser horseshoe listed as a qualifying species but not a primary reason for designation. This SAC is primarily an underground site which provides stable hibernation conditions and swarming conditions for a significant number of the qualifying species.
- 8.123 The SAC includes the hibernation sites associated with 15% of the UK greater horseshoe bat population and is selected on the basis of the importance of this exceptionally large overwintering population. The SAC also supports small numbers of Bechstein's bats hibernating in abandoned mines, though maternity sites remain unknown.
- 8.124 Within Wiltshire, the key guidance document is the "Bath and Bradford on Avon Bat SAC Planning Guidance for Wiltshire". The guidance states *"In order to maintain the integrity of the SACs, it is important to protect the network of 'sensitive features' used by the designated bat populations (as set out in 3.1). These species can be highly mobile and although individual bats are known to occasionally migrate tens of kilometres between roost sites, there are a number of roosts where large numbers of these bats are known to regularly hibernate and breed. These have been identified as 'Core Roosts' for the purposes of this guidance."* Additionally, the landscapes surrounding these Core Roosts which are used regularly for foraging and commuting are also of particular importance and have been identified as 'Core Areas'. The size of these Core Areas is dependent upon the typical ranging behaviour of the species involved. The guidance document defines these as:
- 4km surrounding greater horseshoe Core Roosts;
 - 2km surrounding lesser horseshoe Core Roosts;
 - 1.5km surrounding Bechstein's Core Roosts; and
 - 6km surrounding barbastelle Core Roosts (except at Mottisfont, where local evidence justifies a requirement for a 7.5km radius).
- 8.125 The site does not lie within any bat consultation zones in relation to the SAC.
- 8.126 In addition, typical Bechstein habitat, namely established woodlands, are not present within the site or surrounding area, such that the site is not considered to be of particular interest or value for this species. Greater Horseshoe bats and Lesser Horseshoe bats associated with the designation are unlikely to utilise the site as these species typically fly to foraging areas within four and two kilometres of their roosts respectively. Greater Horseshoe bats are known to fly up to 12km from a roost when suitable foraging habitat is in short supply, however, surveys have shown that the site is only very occasionally used by these species. Accordingly, the proposed development is unlikely to adversely affect the qualifying interest features of the designated site, namely the Bechstein's, Greater Horseshoe or Lesser Horseshoe bat populations during either the construction or operational phase. As such impacts to designated sites are predicted to be **Negligible and Not Significant**.

Non-Statutory Designated Sites

Construction Phase Effects

- 8.127 Given the presence of the watercourse on site and the hydrological link to the Avon River LWS, it is considered that construction risks could include run-off of land-based sediments, pollution incidents (e.g. chemical or fuel spills), increased water run-off rates and contaminated water run-off.

Providing the CEMP is implemented, and standard pollution control best practice is adhered to, it is considered that impacts to the Avon River LWS are **Negligible** and **Not significant**.

- 8.128 For reasons of spatial separation and a lack of identified impact pathways, no significant adverse impacts are predicted to occur on the other non-statutory designated sites located within 2km of the site as a result of construction activities.

Operational Phase Effects

- 8.129 There is potential for adverse impacts to the Avon River LWS via hydrological pathways during operation of the proposed development. SuDS and swales to attenuate surface water run-off have been designed into the proposed development as part of the drainage strategy. Providing the strategy is implemented effectively, impacts to the Avon River LWS during operation are predicted to be **Negligible** and **Not significant**.
- 8.130 It is considered that there would be no adverse impacts on any of the other identified non-statutory designated sites during operation. Minor increases in recreational pressures may occur to those sites which are publicly accessible, however the proposed development is delivering a higher level of POS than is required by existing and emerging policy. Such impacts are therefore predicted to be **Negligible** and **Not Significant**.

Habitats

Hedgerows and Trees

Construction Phase Effects

- 8.131 Construction will require the loss of significant sections of hedgerow in the southern half of the site to allow for visibility splays, roads to pass through the proposed development and the construction of two development parcels. Smaller hedgerow breaches are required in the northern section to make way for access roads. Based upon the Illustrative Landscape Strategy³³, the total loss is anticipated to be approximately 0.27km.
- 8.132 Habitat creation inherent to the scheme includes significant hedgerow planting (c. 1.02km) species-rich native hedgerows within the proposed development. In addition, existing hedgerows will be bolstered by planting of new whips to increase diversity and fill in any gaps.
- 8.133 All retained hedgerows and trees will be protected during construction in accordance with an Arboricultural Method Statement following BS 5837:2012 protection measures through the provisions of the CEMP.
- 8.134 Providing significant planting of new hedgerows within the POS is implemented, impacts to hedgerows are considered to be **Permanent Major Beneficial** and **Significant** at the Local level.
- 8.135 No individual trees are anticipated to be lost as a result of the proposed development, with hedgerow breaches designed to avoid impacts to the hedgerow trees throughout the site. As such, impacts to individual trees during construction are **Negligible** and **Not Significant**.

Operational Phase Effects

- 8.136 Development parcels and road infrastructure will be suitably buffered from retained hedgerows and trees, and therefore the risk of adverse impacts during operation from inappropriate management/removal of hedgerows and trees by occupants is considered to be low. However, without any management, hedgerows are likely to become degraded and gappy, or over-managed resulting in low-quality and structurally poor hedgerows.
- 8.137 Therefore, the operational phase has the potential to result in **Temporary Minor Adverse** impacts, which would be Significant at the **Local** level.

³³ Illustrative Landscape Strategy (edp7940_d013), (2024), EDP.

- 8.138 370 no. new trees will be planted within the POS as part of the inherent design of the scheme, both as street trees and also as specimen trees within areas of more natural landscaping. In addition, significant areas of mixed scrub will be created in the northeast of the site, providing structural diversity in the proposed development's treescape.
- 8.139 As such, impacts to individual trees are anticipated to be **Permanent Major Beneficial** and **Significant** at the **Local** scale.

Watercourse

Construction Phase Effects

- 8.140 The southern crossing will utilise the same space as the existing culverted crossing. The culvert will be removed and replaced by an open span structure, with the banks of the watercourse re-profiled as per the surroundings, re-instating the 3m of watercourse beneath the structure. Approximately 12m of existing watercourse will be overshadowed by the open span structure, reducing the likelihood of vegetation growth along these bank areas, however the removal of the culvert will result in amelioration of the flow rates and capacity of the watercourse, particularly during times of spate.
- 8.141 The existing culvert in the northern section of the Site is to be removed and the watercourse re-instated, with the banks of the watercourse re-profiled as per the surroundings.
- 8.142 The northern crossing will involve the creation of a new open span structure, stretching for c. 17m. This section of the watercourse will be overshadowed, again reducing the likelihood of vegetation growth along these bank areas, however the banks themselves will remain intact and flow regimes and capacity will remain at current levels.
- 8.143 There is potential for increased siltation due to construction run-off and/or pollution event impacts, however a 20m buffer (10m either side of the watercourse) has been designed into the scheme. The riparian vegetation within this buffer will be retained and protected during construction by fencing (through the provisions of the CEMP) to minimise sediment in surface water run-off reaching the watercourse. Cessation of agricultural practices on the site during construction will also reduce and remove adverse effects of nutrient enrichment which will benefit the watercourse.
- 8.144 Standard pollution control measures will be outlined in the CEMP, ensuring any spills/ pollution events do not enter the watercourse.
- 8.145 Providing the measures described above are implemented and the pollution control measures detailed within the CEMP are adhered to, impacts to the watercourse are anticipated to be **Permanent Moderate Beneficial** and **Significant** at a **District** level.

Operational Phase Effects

- 8.146 The watercourse will be retained during the operational phase with a large buffer created by the 20m wide riparian zone, which has been designed into the scheme as a linear green space running through the proposed development, ensuring the watercourse does not suffer permanent adverse impacts as a result of urbanisation. However, whilst there will be a reduction in agricultural run-off and improvement by livestock, the operational phase could result in adverse impacts such as increased surface-water run-off rates and decreased water quality. This could result in mortality to aquatic life and nutrient enrichment. In addition, increased recreational use of the area could result in damage or poaching to the banks.
- 8.147 The drainage strategy has been designed to mitigate for potential increased surface run-off, with several large basins provided throughout the scheme. This will also serve to prevent pollutants entering the watercourse system and decreasing the water quality within. In addition, planting within the riparian zone will also aid the prevention of adverse effects through surface water run-off by preventing nutrients and soil sedimentation reaching the watercourse.
- 8.148 Further mitigation for surface water flooding on the development is provided by a new swale, parallel with the southern boundary conveying flows to the watercourse. This swale will have a small length culverted to allow the main access road to enter the site.

- 8.149 Whilst the 20m buffer zone will be accessible to the public during the operational phase, paths will guide pedestrians and cyclists through the green space and over the two designated crossings, reducing impacts to the riparian corridor and the channel. In addition, habitat creation using structural planting will also serve to protect the watercourse, preventing access to the channel itself for the majority of its length.
- 8.150 It is however important for community engagement and place-making around the watercourse and the riparian corridor to ensure positive long-term interactions by future residents. Planting will therefore be minimised in certain areas, allowing residents to fully engage with the watercourse in a more controlled way than open access would allow. Whilst this kind of engagement could potentially open up opportunities for adverse impacts to the watercourse, it is considered that the controlled access approach will minimise these opportunities and the benefits would outweigh any adverse effects.
- 8.151 Taking the above into consideration, overall the operational phase is predicted to have **Permanent Minor Beneficial** impacts which are **Significant** at the **District** level.

Ditches

Construction Phase Effects

- 8.152 The seasonally wet surface water drainage ditches on site are to be largely retained and integrated into the site-wide drainage strategy. There will however be losses of the southern half of the ditches associated with both H3 and H4 (c. 0.18km in total) to allow for two development parcels, which in the absence of mitigation, will result in the permanent loss of habitat. However, significant lengths of new swales/ ditches (c. 0.31km in total) will be created as part of the drainage strategy inherent to the design of the proposed development, resulting in impacts that are **Permanent Minor Beneficial, Significant** at a **Local** level.
- 8.153 Where road crossings to the northern section of the site are proposed, the ditch associated with H6 will require culverting. This will be in two locations, one in the east and one in the west to allow a continuous road through the proposed development, a total of 0.03km. This will result in the permanent alteration of small sections of this ditch and could result in increased siltation during construction. Without standard mitigation, construction could result in adverse effects such as pollution incidents and changes to water levels and flow. However, providing the CEMP and pollution best practice guidelines are adhered to, impacts are likely to be **Short-term Minor Adverse** and **Not Significant** at a **Local** level.

Operational Phase Effects

- 8.154 Whilst the loss of significant sections of the ditches associated with H3 and H4 will result in permanent habitat loss, in terms of functionality during operation, it is considered that the hydrology (i.e. composition, capacity and permanence) of the retained ditches will be altered following implementation of the drainage strategy. It is therefore considered that the change in functionality as a result of the losses will be mitigated during operation.
- 8.155 In addition, the change in management from pasture will reduce poaching, soil erosion and compaction, and nutrient inputs through manure deposition. This will result in a positive benefit by allowing the ground to vegetate naturally, the soil to improve and in turn improving the water quality entering the ditches as well as reducing silt run off.
- 8.156 Considering the above, there are no predicted negative impacts on the ditches during the operational phase. Therefore, it is considered that impacts will be **Permanent Minor Beneficial** and therefore **Significant** at the **Local** level.

Protected and Notable Species

Amphibians

Construction Phase Effects

- 8.157 Construction activities involving the removal of suitable terrestrial vegetation and implementation of the drainage strategy could adversely impact local amphibian populations, either through direct mortality/ injury, or the loss of habitat.
- 8.158 While GCN have been known to travel distances of 1000m or more, the majority of adults stay within 250m of breeding ponds. The GCN Mitigation Guidelines³⁴ seeks to classify these zones as follows:
- Immediate terrestrial habitat (approx. <50m from breeding pond);
 - Intermediate terrestrial habitat (approx. 50– 250m from breeding pond); and
 - Distant terrestrial habitat (approx. >250m from breeding pond).
- 8.159 Migration is likely associated with high risks due to predation, desiccation and other factors, so this tends to limit migration distances. A study in Western France (Jehle et al.³⁵ 2011) found that 50% of radio-tracked GCN remained within 15m of the breeding pond, with 95% of individuals remaining within 63m of the pond. This suggests that where habitat is suitable, GCN remain in close proximity to their breeding ponds.
- 8.160 For this case, as a precaution, it is assumed that P1 is a breeding pond.
- 8.161 Using the zones described above, the proposals include the following impacts:
- 0 - 100m of P1 (immediate) – removal of c. 10m hedgerow H6 and culverting of the associated ditch.
 - 100 - 250m of P1 (intermediate) – removal of 80m of hedgerow H4 and its associated seasonal ditch.
 - More than 250m from P1 (distant) – removal of 130m of hedgerow and associated ditch.
- 8.162 All other suitable habitat will be retained and protected via the provisions outlined in the CEMP, namely tree protection fencing, during construction.
- 8.163 Given the limited extent of suitable habitat to be removed, it is not considered that entry into the Natural England District Licensing Scheme is necessary. However, as a precaution, where removal of suitable habitat is required to facilitate the proposed development, precautionary methods of working, including hand searching and supervision by a licenced ECoW, will be implemented (through the provisions of the CEMP) to ensure no individuals are harmed during construction.
- 8.164 Providing the measures outlined above and in the CEMP are adhered to, impacts to amphibians (including GCN) are likely to be **Permanent Minor Adverse** but **Not Significant** at the **Site** level.

Operation Phase Effects

- 8.165 The site-wide drainage strategy includes the creation of extensive new potential breeding habitat through significant numbers of attenuation basins, as well as enhancements to connected networks of ditches and swales. Overall, the operational phase is considered to result in **Permanent Moderate Beneficial** impacts on amphibians, **Significant** at the **Local** level.

Badgers

Construction Phase Effects

- 8.166 A potential active badger outlier sett has been recorded on the northern boundary of the site. Given the setts' position in a hedgerow that is to be retained and with inherent buffers included in the design, it is considered that the setts can be retained in-situ. However, it is possible that it could be disturbed during construction activities in proximity. There is also potential for foraging or

³⁴ Great Crested Newt Mitigation Guidelines, (2001), English Nature.

³⁵ The Great Crested Newt – A Dwindling Pond Dweller, (2011), R. Jehle, B. Thiesmeier and J. Foster.

commuting badgers to fall into any open trenches during construction and for new setts to be excavated in areas that could be impacted by detailed proposals.

- 8.167 Measures to protect and buffer the sett are to be outlined within the CEMP, therefore providing these measures are implemented effectively, the potential effects on badger during construction are considered to be **Negligible** and **Not Significant**.

Operation Phase Effects

- 8.168 With the change in land use from agricultural there will be some reduction of available foraging resources to local badgers however, given the large areas of open space inherent to the design and similar available habitats in the surrounding landscape this is not considered to be significant. There would be no severance of habitats or reduction in the accessibility of suitable foraging and sett building opportunities for badger in the local landscape and operational effects on badger are considered to be **Negligible** and **Not Significant**.

Bats – Roosting

Construction Phase Effects

- 8.169 T1, the single tree on site with potential for roosting bats, is to be retained within the proposed development, therefore there will be no direct loss of roosting habitat. Provisions laid out in the CEMP will ensure the tree is protected during construction in line with best arboricultural practices.
- 8.170 Construction activities could result in disturbance through noise and lighting, however the protection of the 15m wide buffer along the eastern boundary with tree protection fencing will ensure no noise or light pollution occurs directly adjacent to T1. Further provisions within the CEMP will serve to minimise lighting impacts through the use of timers and directional luminaires.
- 8.171 Impacts to roosting bats during construction are therefore likely to be **Negligible** and **Not Significant**.

Operation Phase Effects

- 8.172 Trees with potential to support roosting bats could be impacted by light-spill, which can lead to abandonment of traditional roosting sites. New Road does not have existing streetlights and is therefore likely to provide a dark space along this boundary. The landscape buffers, c. 15m wide, inherent to the design of the scheme will allow the maintenance of these dark corridors, ensuring the viability of any roost site that may be present can be maintained. As such, impacts during operation are **Negligible** and **Not Significant**.

Bats – Commuting/ Foraging

Construction Phase Effects

- 8.173 Bats, including horseshoe bats (low numbers recorded), have been shown to avoid gaps as small as 10m³⁶. Commuting routes for bats are not specifically protected, however, it is recognised that fragmentation effects caused by habitat loss can impact upon roosts, potentially causing roost abandonment, reduced access to important foraging areas and adversely impacting the favourable conservation status of bat populations.
- 8.174 In addition, construction lighting may result in similar fragmentation effects to sensitive bat species, such as horseshoe bats, long-eared bats and Myotis species³⁷, if light-spill occurs on hedgerows or the watercourse corridor.
- 8.175 The majority of hedgerows (both peripheral and internal) are to be retained within the scheme however there will be losses of sections of internal hedgerow towards the south of the site,

³⁶ *Habitat Management for Bats: A Guide for Land Managers, Land Owners and Their Advisors*. (2001), Entwistle, A, Joint Nature Conservation Committee. Peterborough.

³⁷ *Street Lighting Disturbs Commuting Bats*. *Current Biology*, 19 (13) pp. 1123-1127, (2009), E.L. Stone, G. Jones and S. Harris.

necessary to facilitate the proposed development. These losses will be compensated through the planting of significant lengths of new hedgerows.

- 8.176 Provisions outlined in the CEMP will ensure retained habitats are protected throughout construction, allowing commuting and foraging opportunities to be maintained throughout this period.
- 8.177 Further provisions within the CEMP will provide details for construction lighting, ensuring that any lighting considered necessary is in line with BCT/ILP guidance. Lighting will be directed away from retained hedgerows and the watercourse and used only when strictly necessary. Lights will be fitted with timers/ motion sensors to ensure non-essential lighting is minimised.
- 8.178 Due to the loss of significant sections of hedgerow and subsequent compensation once the new hedgerows have established, impacts to commuting bats during construction are likely to be **temporary but medium-term, being Moderate Adverse** to begin with. However, as the new hedgerows grow and become established commuting features, these impacts are expected to diminish, resulting in **Negligible** impacts which are **Not Significant** in the long-term.

Operation Phase Effects

- 8.179 The proposals include the loss of a range of habitats, however for the most part these are considered to be of relatively low suitability for bats (with the possible exception of the low numbers of greater horseshoe bats recorded due to their propensity for cattle grazed pasture). The operational phase will result in permanent fragmentation as a result of infrastructure bisecting commuting corridors and unmitigated light-spill on features of value to light-averse species such as horseshoe bats and Myotis species. Lighting can also affect the assemblage or population of bats by increasing predation, changing the composition of the invertebrate community and attracting invertebrates away from dark areas, therefore putting light-averse species at a competition disadvantage (ILP, 2023).
- 8.180 To mitigate for the fragmentation effects, strong green linkages are inherent to the design of the proposed development with the aim of maintaining site permeability. Landscape buffers of at least 10m (15m in some cases) are inherent to the scheme, having been 'designed in' along the majority of peripheral boundaries, maintaining foraging habitat and protecting retained hedgerows.
- 8.181 Significant areas of high-quality suitable foraging and commuting habitat (e.g. hedgerows, species rich grasslands, ditches, ponds and scrub) will be created within POS, maintaining strong east-west and south-north connectivity through enhancement of H6 and its associated corridor and the creation of the wide linear greenspace within the riparian zone respectively. Structurally diverse planting within these areas will provide a variety of habitats, including 'edge' habitats, which will encourage a variety of species.
- 8.182 New attenuation features created as part of the drainage strategy will provide enhanced foraging opportunities by encouraging a range of invertebrates into the site.
- 8.183 In addition, the creation of significant lengths of new hedgerow throughout the proposed development, in combination with other linear habitats such as new swales and drainage ditches will provide suitable compensation for the losses of sections of H3 and H4, ensuring linear features are inherent to the design of the scheme.
- 8.184 In terms of habitat retention/ creation, it is considered that the inherent landscaping will provide enhanced and better connected commuting and foraging habitat, resulting in **Permanent Moderate Beneficial** impacts, **Significant** at a **Local** level.
- 8.185 It is however acknowledged that in the absence of further mitigation, light spill within these corridors may result in fragmentation, with impacts that are likely to be **Permanent Moderate Adverse** and therefore **Significant** at a **Local** level.
- 8.186 In addition, over-management of hedgerows could also reduce the value of the site to commuting and foraging bats by reducing the function of hedgerows as navigation tools/ protection against prevailing weather conditions and reducing their value to invertebrate prey. This would result in a **long-term but reversible Adverse** impact.

Breeding Birds

Construction Phase Effects

- 8.187 Vegetation clearance may result in an offence under the WCA 1981 if undertaken during the breeding season, as well as reduce available breeding habitat. Noise is also likely to result in temporary displacement effects, with birds abandoning parts of the site during construction activities.
- 8.188 The majority of suitable nesting habitat will, however, be retained within the inherent landscape buffers and protected under the provisions of the CEMP. The CEMP also stipulates that removal of woody vegetation is to be undertaken outside the breeding bird season (taking into consideration dormouse mitigation – see below), or with a pre-works check by an ecologist for breeding birds. Any active nest will require protection and buffering until all chicks have fledged.
- 8.189 Provided the measures outlined in the CEMP are implemented effectively, impacts to breeding birds during construction are **Negligible** and **Not Significant**.

Operation Phase Effects

- 8.190 A change in land use, increase in domestic pets and increased levels of disturbance in areas of open space are likely to influence the location and assemblage of birds using the site. However, the farmland and urban-fringe bird species recorded using the site currently are generally likely to habituate to the change and the proposed development is likely to result in an increase in certain species, such as small passerines, as a result of gardens and increased foraging opportunities. Impacts are therefore predicted to be **Negligible** and **Not Significant** during operation.

Dormouse

Construction Phase Effects

- 8.191 Dormice have been recorded utilising the hedgerow network on-site, and presence is assumed in all hedgerows on the site. The loss of hedgerow would result in habitat loss, fragmentation and potentially injury / mortality of dormice during construction. This would constitute an offence under the Conservation Regulations / WCA 1981 (as amended) and could have long-term / permanent effects on the dormouse population in the area. This would constitute a **Permanent Major Adverse impact, Significant** impact at the **District** level.

Operation Phase Effects

- 8.192 Potential adverse impacts on dormice could occur during the operational phase as a result of inappropriate hedgerow management (resulting in degradation or loss of habitat). In addition, inappropriately timed management could result in injury / mortality and an offence under legislation.
- 8.193 A residential development of this size is also likely to lead to an increase in predation of dormice by domestic cats.
- 8.194 The operation phase is predicted to result in **Permanent Major Adverse** effects on dormice, which could be **Significant** at the **District** level.

Invertebrates

Construction Phase Effects

- 8.195 No significant effects have been identified during the construction with hedgerow retention and suitable buffers to features of greatest value to invertebrates namely the watercourse and the majority of hedgerows. Some habitat loss associated with hedgerow removal will occur but the overall effect on the invertebrate assemblage is considered to be **Negligible** and **Not Significant**.

Operation Phase Effects

- 8.196 Inappropriate habitat management could have impacts on invertebrates using the site, for example intensive mowing, hedgerow trimming or removal of deadwood features could remove plants/features on which a range of widespread and notable invertebrates rely.
- 8.197 This could lead to **Permanent Minor Adverse** effects at the **Site** level, which are considered **Not Significant**.

Reptiles

Construction Phase Effects

- 8.198 Construction activities will result in the loss of very small amounts of suitable habitat (hedgerow bases) for common species of reptile and has a low potential to result in an offence under the WCA 1981 (as amended) from accidental killing and injury. Provision for amphibians laid out in the CEMP will also ensure no reptiles are harmed during habitat removal.
- 8.199 The landscape buffers inherent to the design will ensure remaining suitable habitat is protected during construction, ensuring reptiles will still be able to commute via the majority of the hedgerows on site. Impacts are therefore **Negligible** and **Not Significant** during the construction phase.

Operation Phase Effects

- 8.200 Post-construction, the proposed development delivers significant areas of new open space including habitats that would be suitable for reptiles such as attenuation ponds, mixed scrub areas and the habitats associated with the riparian corridor. These are likely to provide enhanced habitat to the population of reptiles currently assumed to be present. Therefore, impacts are considered to be **Permanent Moderate Beneficial** and **Significant** and the **Site level**.

Hedgehogs

Construction Phase Effects

- 8.201 There is a risk of individual hedgehog mortality during site clearance works which impact upon potentially suitable habitat e.g. hedgerows. There is also risk of entrapment and injury resulting from exposed excavations. The risks to hedgehogs are considered relatively low and **Not Significant**.

Operation Phase Effects

- 8.202 The creation of new barriers across the site in the form of garden fences could cause fragmentation to hedgehog habitat, preventing them from moving across site and accessing foraging grounds. The new road network and traffic movements may increase the potential for hedgehog mortality. The risks to hedgehogs during operation are considered **Permanent Moderate Adverse** and **Significant** at the **Local** level.

ACTIONABLE MITIGATION

- 8.203 This section outlines the further measures required in order to mitigate for those impacts that could not be mitigated either through inherent or standard mitigation measures. These are measures that have not been designed into the proposals and will be secure through a controlling mechanism such as planning condition or legal agreement.
- 8.204 They include:
- Habitat Maintenance and Monitoring Plan (HMMP) – to guide the future delivery of Biodiversity Net Gain on site and will include management of all retained, enhanced and newly created habitats for the benefit of biodiversity;
 - Lighting Strategy; and
 - Dormouse mitigation licence to be obtained from Natural England.

RESIDUAL IMPACT ASSESSMENT

8.205 The following sections bring forward those important ecological features where adverse impacts cannot be mitigated through the implementation of inherent and standard mitigation measures and describe how Actionable Mitigation will be applied to provide further compensation to eliminate impacts where possible. Where impacts were described as Negligible or Beneficial in the Assessment of Effects, no further consideration is necessary.

Habitats

Hedgerows and Trees

Operational Phase Effects

8.206 The effective implementation of the provisions described within the HMMP will ensure long-term management of both retained and created hedgerows for the lifetime of the proposed development.

8.207 Providing the HMMP is adhered to, residual impacts are likely to be **Negligible** and **Not Significant**.

Protected and Notable Species

Bats – Roosting

Operational Phase Effects

8.208 While no evidence of roosting bats has been confirmed within TI, roosts in trees are often used intermittently and, therefore, bats could potentially be present in future years. TI will therefore be protected from un-mitigated light spill by the implementation of a sensitive lighting strategy which will include a buffer of at least 15m around the tree to prevent operational light-spill causing abandonment of a potential roost. Further specifications that will be included in the lighting strategy are detailed in the Commuting/ Foraging section below.

8.209 Bat roosting opportunities within the proposed development will be enhanced through the provision of bat boxes installed on the new dwellings. Installation will be at a rate of 1 box per dwelling, in line with the Wiltshire Design Guide³⁸ (2023). A variety of boxes will be utilised to cater for a variety of species and different times of year. Examples are:

- Vivara Pro Build-in Woodstone Bat Tube – suitable for pipistrelle species;
- Beaumaris Woodstone Box – suitable for common pipistrelle, soprano pipistrelle, Nathusius' pipistrelle, Brandt's bat and whiskered bat;
- Schwegler 1Q Summer and Winter Bat Box – suitable maternity and hibernation roost box for pipistrelles, noctule, Bechstein's bat and serotine.

8.210 Providing the lighting strategy is implemented and new roosting opportunities are installed within the new dwellings, impacts to roosting bats are likely to be **Permanent Major Beneficial** and **Significant** at a Local level.

Bats – Commuting/ Foraging

Operational Phase Effects

8.211 In order to mitigate the residual effects of un-restricted light spill which may result in permanent fragmentation of commuting routes and foraging habitat, a sensitive lighting strategy, produced in accordance with BCT/ ILP (2023) Bats and Artificial Lighting, will be implemented. The lighting strategy will include a lighting assessment detailing collection of baseline lux levels from various

³⁸ Wiltshire Design Guide (2023) – Wiltshire Council

sampling points (including those identified as being of potential ecological sensitivity) across the site. Baseline lux levels will then be used to assess the impacts of increased light spill and include modelling of internal light spill resulting from the proposals.

- 8.212 The landscape buffers, riparian green space and scrub planting to the north-east of the proposed development will all be subject to the provisions within the lighting strategy and will remain unlit where possible. Where lighting is required, e.g. at crossing points or adjacent to footpaths, luminaires will have motion detectors specific to the human form preventing them from lighting up in reaction to wildlife passing by. These specifications will ensure light-averse species such as horseshoes and Myotis bats can continue to move through the site once operational.
- 8.213 New habitats will be managed in the long-term through the provisions of the HMMP to:
- ensure thick, bushy hedgerows, maintained at 2.5m in height where possible to provide strong linear commuting features;
 - ensure grasslands and attenuation features establish and provide new habitats for a variety of forage invertebrates for bats; and
 - provide structural diversity of planting throughout the scheme to provide habitats suitable for a variety of bat species.
- 8.214 Provided the lighting strategy and HMMP are implemented effectively, the residual impacts to commuting/ foraging bats are likely to be **Negligible** and **Not Significant**.

Breeding Birds

Operational Phase Effects

- 8.215 Bird nesting opportunities within the proposed development will be enhanced through the provision of bird boxes installed on the new dwellings. The Wiltshire Design Guide, which is based on British Standard 42021:22, states that 'Universal' bird bricks should be used. Studies have shown that swift bricks will be used not only by swifts but also by starlings, house martins, blue tits, great tits and house sparrows.
- 8.216 Installation will be at a rate of 1 box per dwelling, in line with the Wiltshire Design Guide³⁹ (2023). However, as swifts are a gregarious species meaning they live in colonies, groups of three or five boxes will be installed per dwelling, totalling the 1 box per dwelling ratio. For example, if the proposals are for 295 dwellings therefore 98 dwellings should have 3 swift bricks installed with a total of 294 throughout the proposed development.
- 8.217 Examples include:
- Schwegler Lightweight Swift Box No. 1a;
 - Woodstone Build-in Swift Box Visible; or
 - Schwegler No. 17a Swift Nest Box Triple Cavity (provides three nesting cavities in one box therefore only one box required per installation dwelling).
- 8.218 Providing new nesting opportunities are installed within the new dwellings as described, impacts to roosting bats are likely to be **Permanent Major Beneficial** and **Significant** at a Local level.

Dormouse

Construction Phase Effects

- 8.219 Due to the confirmed presence of dormouse on site, a mitigation licence must be obtained from Natural England prior to any significant works impacting hedgerows and trees, or other suitable habitat.

³⁹ Wiltshire Design Guide (2023) – Wiltshire Council

- 8.220 Removal of suitable vegetation will be undertaken in strict accordance with a Method Statement (approved under the mitigation licence), which may involve removal across multiple years to allow dormice to disperse.
- 8.221 Removal should be undertaken during the active but non-breeding season of May or September – October, or a winter cut above 300mm, with ground level vegetation removed after hibernation season.
- 8.222 Connectivity through the landscape will be maintained by planting new species-rich native hedgerows and mixed scrub, linking up existing suitable areas and including appropriate species. Planting should be commenced as soon as possible (in the appropriate planting season), preferably prior to impact to limit the time associated with establishment of new habitats and ensure sufficient habitat is available at the time of clearance. Approximately 1.02km new hedgerow and 0.48ha mixed scrub planting are included within the red line boundary to compensate for hedgerow losses and to ensure connectivity for the species. In addition, a further 0.5ha mixed scrub planting will be undertaken, again prior to clearance to allow for advanced establishment, in an offsite (blue line) location to the north-east of the proposed development. This area will be connected to the proposed development via existing hedgerows (both onsite and offsite) and through bolstering the boundary planting along the eastern boundary, adjacent to the existing residential dwelling. Specific details of composition etc will be determined within the method statement of the mitigation licence once secured from Natural England. As there are no existing suitable trees to install dormouse boxes on for population monitoring purposes, use of the site by the existing population of dormice will be monitored for a number of years post-development (details to be agreed by Natural England at licencing stage) via the installation of nest tubes (number to be agreed by Natural England) within the existing hedgerows throughout the site.
- 8.223 Details of timing, ECoW/supervision requirements etc will be detailed within the Method Statement of the licence but also within the CEMP. Providing these are adhered to, residual impacts to dormice during construction are considered to be **Negligible and Not Significant**.

Operational Phase Effects

- 8.224 Habitats will be managed for the benefit of dormice. For those habitats within the proposed development, adherence to the HMMP for the lifetime of the development will ensure thick bushy hedgerows and good scrub structure are maintained. For the 0.5ha of offsite mixed scrub, management prescriptions will be detailed within the method statement and other documents associated with the mitigation licence once secured from Natural England.
- 8.225 Providing the mitigatory planting, HMMP and mitigation licence documentation are implemented effectively, residual impacts to dormice are considered to be **Permanent Major Beneficial**, and **Significant** at a **District** level.

Invertebrates

Operational Phase Effects

- 8.226 Habitat provisions for reptiles (see below) will also provide enhanced opportunities for a wider variety of invertebrates, encouraging colonisation where they are not currently present.
- 8.227 Providing new habitat can be incorporated into the proposed development, residual impacts to invertebrates during operation are likely to be **Permanent, Moderate Beneficial** and **Significant** at a **Local** level.

Reptiles

Operational Phase Effects

- 8.228 Newly created habitats within the POS, including riparian green space, attenuation features and new hedgerow/ scrub planting will provide new opportunities for common species of reptile such as slow worm, grass snake and common lizard.

- 8.229 Habitats will be further enhanced through the provision of hibernacula/ habitat piles within the riparian greenspace. These will be constructed of dead wood, ideally using arisings from hedgerow removal on site, topped with loose soil and turf. Dimensions should be a minimum of 2m length x 1m width x 1m height.
- 8.230 Providing the above can be incorporated into the proposed development, residual impacts to common species of reptile during operation are likely to be **Permanent Moderate Beneficial** and **Significant** at a **Local** level.

Hedgehogs

Operational Phase Effects

- 8.231 Newly created habitats within the POS, including riparian green space, attenuation features and new hedgerow/ scrub planting as well as residential gardens will provide new opportunities for hedgehog.
- 8.232 'Hedgehog highways' will be created in all solid fencing across the site and "*under any infrastructure which severs green infrastructure corridors*" (Wiltshire Design Guide) to allow free traversal throughout the proposed development.
- 8.233 Habitats will be further enhanced through the provision of hibernacula within the riparian greenspace. Four hedgehog domes will be provided within suitable habitat.
- 8.234 Providing the above can be incorporated into the proposed development, residual impacts to hedgehogs during operation are likely to be **Permanent Moderate Beneficial** and **Significant** at a **Local** level.

CUMULATIVE EFFECTS

- 8.235 The EIA Regulations (Schedule 4) require that cumulative effects of development be considered within an ES.
- 8.236 Cumulative environmental effects in EIA have been defined as '*impacts that result from incremental changes caused by other past, present or reasonably foreseeable actions, together with the project.*' (Hyder/EC, 1999). In the context of EIA, cumulative effects '*could refer to the combined effects of different development activities within the vicinity or those different aspects of a single development on a particular receptor*' (CLG, 2006).

Plans/Projects Considered

- 8.237 This ES aims to give full consideration to the likely significant cumulative effects of the proposed development with other development in the vicinity of the application site (as identified via the EIA Scoping consultation) namely:
- Land South of Western Way, Bowerhill, Melksham (W16.1123) – Outline application for up to 235 dwellings, c. 1.57km southwest. Potential impacts to commuting/ foraging bats, birds and GCN as a result of the development with appropriate mitigation recommended. It is therefore predicted that the significance of these impacts are no greater than that identified for the in-isolation assessment. As such, **no cumulative effects when in combination with this application** anticipated;
 - Land South of Western Way, Melksham (W18.4477) – Reserved matters (213 dwellings) application pursuant to above with no residual ecological impacts therefore **no cumulative effects when in combination with this application**;
 - Land East of Spa Road, Melksham (18/04644/REM) – Reserved matters application c. 0.9km south of the site with no residual ecological impacts therefore **no cumulative effects when in combination with this application**;
 - Bowden Guest House, 25-27 Beanacre Road, Melksham (WI 7.10015) – Full application for conversion and extension of bed and breakfast establishment into 10 self-contained flats, c.

1.54km west. Due to the distances involved and the limited scale of the proposals, no impacts are anticipated as a result of the development, therefore **no cumulative effects when in combination with this application** anticipated;

- Land East of Semington Road, Melksham (17/12514/REM) – Reserved matters application pursuant to Outline (Ref: 16/00497/OUT) for 150 dwellings with associated infrastructure with no residual ecological impacts therefore **no cumulative effects when in combination with this application**;
- 3 Lowborne, Melksham (W13.7076) – Demolition of existing building and erection of 17 flats. 1.3km to the west. Due to the distances involved and the limited scale of the proposals, no impacts are anticipated as a result of the development, therefore **no cumulative effects when in combination with this application** anticipated;
- Land East of Semington Road, Melksham (20/01938/OUT) – Outline planning application for up to 144 dwellings, c. 2.4km southwest of the site. Proposed mitigation ensures no residual impacts therefore **no cumulative effects when in combination with this application** anticipated;
- Park Farm, Seend Cleeve, Melksham (20/02213/FUL) – Full planning application for the erection of one four-bed self-build house and 10 affordable houses, c. 3.29km to the south. Due to the distances involved and the limited scale of the proposals, no impacts are anticipated as a result of the development, therefore **no cumulative effects when in combination with this application** anticipated;
- Land at Blackmore Farm (PL/2023/11188) – Demolition of agricultural buildings and development of up to 500 dwellings, c.0.04km to the southeast of the site. Minor adverse residual impacts to habitats, plants, invertebrates, amphibians, birds, bats, dormouse, otter, hedgehog and brown hare. It is however predicted that the significance of these impacts are no greater than that identified for the in-isolation assessment. As such, **no cumulative effects when in combination with this application** anticipated;
- Land South of Western Way, Melksham (PL/2022/08504) – Outline planning application for the erection of up to 210 residential dwellings, c. 1.75km southwest. Potential minor impacts to GCN, reptiles and hedgehog as a result of the development with appropriate mitigation recommended. It is therefore predicted that the significance of these impacts are no greater than that identified for the in-isolation assessment. As such, **no cumulative effects when in combination with this application** anticipated;
- Land to the West of Semington Road, Melksham (PL/2022/08155) - Outline Planning application for up to 53 dwellings including formation of access and associated works, with all other matters reserved. Potential impacts to badgers, bats (foraging and commuting), nesting birds, reptiles and hedgehog with appropriate mitigation recommended. As such, **no cumulative effects when in combination with this application** anticipated;
- Land at Verbena Court, Melksham (PL/2023/06976) - Construction of a care home (within Class C2), parking, access, hard and soft landscaping and other associated works. Potential impacts nesting birds, reptiles and foraging/ commuting bats with appropriate mitigation recommended. As such, **no cumulative effects when in combination with this application** anticipated; and
- Land at Longleaze Lane, Melksham (PL/2023/06725) - Construction of elderly care home (Use Class C2) with associated access works, landscaping and drainage. Improvements to site access and Longleaze Lane/ Snowberry Lane junction. Potential impacts to commuting/ foraging bats, hedgehog, nesting birds, great crested newt and invertebrates. with appropriate mitigation recommended. As such, **no cumulative effects when in combination with this application** anticipated

BIODIVERSITY NET GAIN

- 8.238 A BNG calculation was undertaken using the Statutory Biodiversity Metric⁴⁰ (DEFRA, 2024). A number of principles and assumptions were made when undertaking the calculation. More information relating to these and the methods applied is provided in Appendix 8.2, which also includes the relevant figures which accompany the Metric, and Appendix 8.3 for an unlocked version of the Statutory Metric calculator tool.
- 8.239 As demonstrated in Table 8.6 below, the BNG assessment predicts that with the onsite measures implemented, the proposed development will deliver a net gain for biodiversity in relation to habitats and hedgerows. In relation to watercourses, whilst the proposals show a percentage gain post-development, due to the introduction of culverts which are automatically considered as lost within the metric, the proposals do not satisfy the trading summaries. As such, an offsite solution will be sought to ensure trading down does not occur.

TABLE 8.6 SUMMARY OF BNG METRIC ASSESSMENT

UNIT TYPE	ONSITE BASELINE UNITS	ONSITE DEVELOPMENT UNITS	POST- NET UNIT CHANGE	% CHANGE	TRADING RULES
Habitat	28.74	33.01	4.27	14.85%	Yes
Hedgerow/ Linear	18.17	26.71	8.54	47.00%	Yes
Watercourse	5.0	5.7	0.7	13.95%	Yes

CLIMATE CHANGE

- 8.240 The identified ecological receptors are, or comprise of, living organisms and therefore these are all affected to a greater or lesser extent by changes in temperature, precipitation, humidity and wind. The projected climate changes could result in changes in composition, distribution and structure of habitats and could cause changes in survival/ suitability of the site for faunal species; however, this is very difficult to measure/ predict due to the relationships between species as well as their ability to adapt to changes.
- 8.241 Overall, the faunal receptors on site are considered of 'low to moderate vulnerability' to climate change and whilst communities on site may change over time, the residual impacts of the proposed development itself are unlikely to change. However, the ongoing management plan for habitats and species on site will require periodic review (e.g. every 5 years) to ensure that it accounts for any changes that may arise due to climate change.

COMPLIANCE WITH POLICY AND LEGISLATION

- 8.242 Provided that the mitigation measures contained within this report are adopted in full, it is concluded that the proposed development can proceed in accordance with local and national planning policy and wildlife legislation.

MONITORING AND FOLLOW UP

- 8.243 As discussed above the HMMP will be produced to guide habitat creation and to monitor the environmental impact of the project. Monitoring is vital to ensure that the mitigation described in this report has been undertaken to a satisfactory standard. This applies to both the construction and

⁴⁰ The Statutory Biodiversity Metric Calculation Tool, (2024), DEFRA.

operation phases of the development. Details and frequency will be provided within the HMMP, which will be a 'live' document and subject to regular updates and iterations, or the method statement for any mitigation licences required to ensure successful establishment and delivery of mitigation and enhancement measures.

- 8.244 Monitoring that is a requirement of any European Protected Species Mitigation Licences (i.e. for dormice) will be excluded and covered separately as part of the Work Schedule and Post-Development Monitoring which is required as part of any Licence Application.

SUMMARY

- 8.245 In the absence of mitigation there will be a likely significant effect on the following ecological receptors: amphibians, bats, badger, breeding birds, dormouse, reptiles, hedgehogs and invertebrates. However, with a comprehensive suite of avoidance, mitigation and compensation measures there will be no likely significant residual adverse effects.
- 8.246 Mitigation proposals for impacts to important ecological features during construction, which should be implemented via a CEMP, include sensitive timing and phasing of works, avoidance of impacts on important habitats and implementing protective measures to those being retained, buffers, ecological clerk of works and licensing (where relevant) during sensitive tasks.
- 8.247 Mitigation proposals for impacts during the operational phase include (but are not limited to) delivery of an overarching and integrated HMMP. Measures contained therein including creation of new habitat and enhancements to existing retained habitats through sensitive management. It is considered that the proposal can also deliver a biodiversity net gain on the site, through habitat retention, enhancement and creation.
- 8.248 It is anticipated that the proposed development will result in no significant adverse effects to nature conservation alone or cumulatively, assuming the mitigation proposed above is implemented. The proposed enhancement measures will have a beneficial effect on nature conservation in relation to HPI, other habitats and fauna species.

TABLE 8.7 SUMMARY SIGNIFICANCE TABLE

IMPORTANT ECOLOGICAL FEATURE & SUMMARY OF IMPACT*		NATURE OF EFFECT (PERMANENT/TEMPORARY)	SIGNIFICANCE (MAJOR/MODERATE/MINOR/NEGLIGIBLE) (BENEFICIAL/ADVERSE)	ACTIONABLE MITIGATION ENHANCEMENT MEASURES	/	GEOGRAPHICAL IMPORTANCE								RESIDUAL EFFECT LEVEL OF SIGNIFICANCE			
						I	UK	E	R	C	D	L	S	(MAJOR/NEGLIGIBLE)	MODERATE/ADVERSE)	MINOR/ADVERSE)	
CONSTRUCTION																	
Bath & Bradford on Avon Bats SAC		N/A	Negligible, Significant	Not	None required	*									Negligible, Not Significant		
Non-Statutory Designated Sites		N/A	Negligible, Significant	Not	None required					*					Negligible, Not Significant		
Hedgerows		Permanent	Major Beneficial, Significant		None required							*			Major Beneficial, Significant		
Trees		N/A	Negligible, Significant	Not	None required							*			Negligible, Not Significant		
Watercourse		Permanent	Moderate Beneficial, Significant		None required						*				Moderate Beneficial, Significant		
Ditches	Creation of new swales/ditches	Permanent	Minor Beneficial, Significant		None required							*			Minor Beneficial, Significant		
	Increased siltation during creation of two culverts	Temporary, Short term	Minor Adverse, Not Significant		None required							*			Minor Adverse, Not Significant		

Amphibians		Permanent	Minor Adverse, Not significant									*	Minor Adverse, Not significant
Badgers		N/A	Negligible, Not Significant	None required	No conservation status								Negligible, Not Significant
Bats – Roosting		N/A	Negligible, Not Significant	None required								*	Negligible, Not Significant
Bats – Commuting	Loss of commuting habitat (hedgerows)	Temporary, medium-term	Moderate Adverse, Not Significant (in the long-term)	Significant lengths of hedgerow will be planted throughout the proposed development								*	Moderate Beneficial, Significant
Breeding Birds		N/A	Negligible, Not Significant	None required								*	Negligible, Not Significant
Dormouse	Habitat loss, fragmentation and potential injury/ mortality	Permanent	Major Adverse, Significant	Implementation of mitigation licence obtained from NE ECoW and timing of works in accordance with licence method statement								*	Negligible, Not Significant
Invertebrates		N/A	Negligible, Not Significant	None required								*	Negligible, Not Significant
Reptiles		N/A	Negligible, Not Significant	None required								*	Negligible, Not Significant
Hedgehogs		N/A	Negligible, Not Significant	None required								*	Negligible, Not Significant
OPERATION													
Bath & Bradford on Avon Bats SAC		N/A	Negligible, Not Significant	None required	*								Negligible, Not Significant

Non-Statutory Sites	Designated	N/A	Negligible, Not Significant	None required					*			Negligible, Not Significant
Hedgerows		Temporary, reversible	Minor Adverse, Significant	Implementation of HMMP						*		Negligible, Not Significant
Trees		Permanent	Major Beneficial, Significant	Implementation of HMMP						*		Negligible, Not Significant
Watercourse		Permanent	Minor Beneficial, Significant							*		Minor Beneficial, Significant
Ditches		Permanent	Minor Beneficial, Significant							*		Minor Beneficial, Significant
Amphibians		Permanent	Moderate Beneficial, Significant							*		Moderate Beneficial, Significant
Badgers		N/A	Negligible, Not Significant	None required	No conservation status							Negligible, Not Significant
Bats – Roosting		N/A	Negligible, Not Significant	Installation of bat boxes at a rate on one per dwelling Implementation of lighting strategy						*		Permanent Major Beneficial, Significant
Bats – Commuting	Creation of new commuting habitat	Permanent	Moderate Beneficial, Significant	None required						*		Moderate Beneficial, Significant
	Light spill	Permanent	Moderate Adverse, Significant	Implementation of lighting strategy						*		Negligible, Not Significant

	Over-management of hedgerows	Temporary, long-term but reversible	Moderate Adverse, Significant	Implementation of HMMP							*		Negligible, Not Significant
Breeding Birds		N/A	Negligible, Not Significant	Installation of bird boxes at a rate of one per dwelling							*		Permanent, Major Beneficial, Significant
Dormouse	Inappropriate management of hedgerows	Permanent	Major Adverse, Significant	Mitigatory planting Implementation of HMMP						*			Permanent, Moderate Beneficial, Significant
Invertebrates		Permanent	Minor Adverse, Not Significant	Reptile hibernacula (see below) will provide new habitats for invertebrates							*		Permanent, Major Beneficial, Significant
Reptiles	New habitat created within attenuation ponds, mixed scrub and riparian corridor.	Permanent	Moderate Beneficial, Significant	Provision of reptile hibernacula/ habitat piles within riparian greenspace						*			Permanent, Moderate Beneficial, Significant
Hedgehogs	Habitat fragmentation due to garden fences and increased traffic movement	Permanent	Moderate Adverse, Significant	Installation of hedgehog highways in all solid fencing Four hedgehog domes to be installed in suitable habitat							*		Permanent, Moderate Beneficial, Significant

*Impact is determined following the implementation of inherent and standard mitigation measures

9 Landscape & visual

INTRODUCTION

- 9.1 The following chapter has been prepared by The Environmental Dimension Partnership Ltd. It assesses the likely significant effects of the Proposed Development, outlined in red on Figure EDP 9.1 (within Appendix 9.1), in terms of landscape and visual amenity and incorporates a summary of the Landscape and Visual Baseline provided in full at Appendix 9.1.
- 9.2 When classifying the criteria for the importance/sensitivity of receptors within this Environmental Statement (ES) chapter, a variation in the methodology set out in the intro chapters of the ES is utilised. This comprises the addition of 'very high' and 'negligible' criterion to the importance/sensitivity of receptors table presented in Table 9.1 and 9.2.
- 9.3 In order to establish the baseline and potential limit of significant effects, it has been necessary to view the study area at two geographical scales.
- 9.4 A broad study area of up to 5km from the site has been adopted as the initial search area. This enables the geographical scope of the assessment to be defined and provides the wider geographical context of the study. Within this area, the search has focused on: identifying the local planning policy context; identifying national and local landscape designations and other relevant designations, for example, historic parks and gardens; and providing a general geographical understanding of the site and its broader context, in relation to landform, transport routes and the distribution and nature of settlement.
- 9.5 Following this initial analysis and subsequent field work, and having an appreciation of the development proposed, a refinement of the study area has been developed, which focuses on those areas and features that are likely to be affected by the proposals. The extent of this study area is 1km from the site boundary, although occasional reference may be made to features beyond this area where appropriate. This detailed study area is illustrated on Figure EDP 9.1 (within Appendix 9.1). This approach is in accordance with the Guidelines for Landscape and Visual Impact Assessment (Third Edition LI/IEMA, 2013), which seeks a proportional approach to the assessment (paragraphs 5.2 and 6.2).
- 9.6 The chapter should be read in conjunction with the Technical reports included at appendices 9.1, 9.2 and 9.3 and the Parameters plans within Appendix 4.

POLICY FRAMEWORK

- 9.7 This section sets out the relevant policy and guidance that has been considered in preparation of the assessment. There is no relevant legislation.
- 9.8 The assessment considers a range of national and local adopted and draft policies including:
- National Planning Policy Framework (NPPF), Ministry of Housing, Communities and Local Government (2024);
 - Planning Practice Guidance, Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government (2016, as updated);
 - Wiltshire Core Strategy, Wiltshire Council (2015);
 - Joint Melksham Neighbourhood Plan 2020-2026 (2021);
 - Local Plan review (Reg 19) (released autumn 2023);
 - Emerging Melksham Neighbourhood Plan 2020 – 2038 (2024);

- Relevant Supplementary Planning Guidance; and
- Melksham Neighbourhood Plan Local Landscape Character Neighbourhood Plan Evidence Base Report (2020).

National Planning Policy Framework

- 9.9 At the heart of the NPPF is a presumption in favour of sustainable development; this being the golden thread running throughout the document and the development of NPPF policies. Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as improving people's quality of life, including inter alia, moving from a net loss of biodiversity to achieving net gains for nature, replacing poor design with better design and improving the conditions in which people live, work, travel and take leisure.
- 9.10 Considering this broad aim alongside the three dimensions to sustainable development, and in particular that relating to environmental matters, the role of the Landscape and Visual Impact Assessment (LVIA) is key in the creation of successful places in which to live and work. Through the development and design of integrated open space, allied to the protection or enhancement of the natural environment, the LVIA considers the challenges of the NPPF head-on.
- 9.11 Paragraph 187 states that the planning system should contribute to and enhance the natural and local environment by inter alia “protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan)” and “recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland”.
- 9.12 Additional Planning Practice Guidance (PPGs) supports the NPPF and includes guidance on:
- Landscape;
 - Biodiversity, ecosystems and green infrastructure; and
 - Brownfield land, soils and agricultural land.

Wiltshire Core Strategy

- 9.13 The statutory development plan relevant to the site comprises the Wiltshire Core Strategy 2015 – 2026, adopted on 20 January 2015. The following policies in the adopted local plan are considered relevant to this ES:
- Core Policy 51 – Landscape: Development proposals should “*protect, conserve and where possible enhance landscape character*” and any negative impacts should be appropriately mitigated through “*sensitive design and landscape measures*”;
 - Core Policy 52 – Green Infrastructure: Development proposals should “*make provision for the retention and enhancement of Wiltshire’s green infrastructure network*”. Proposals should seek to enhance this by incorporating further links into this network; and
 - Core Policy 57 – High Quality Design and Local Distinctiveness: Any development proposal should demonstrate “*a strong sense of place*” and is expected to “*be complementary to the locality*”. Proposals should provide a positive response to the local landscape and townscape features.
- 9.14 An area to the east of the site is designated as a ‘Special Landscape Area’ (SLA). This policy is a ‘saved policy’ from the West Wiltshire Local Plan and included in the Wiltshire Core Strategy. An SLA is defined as an area of locally designated, high landscape quality. The site is not located within the SLA.

Joint Melksham Neighbourhood Plan 2 2020 – 238

9.15 The Joint Melksham Neighbourhood Plan 2 was adopted in 2025 and was prepared by Melksham Town and Melksham Without Parish Council. The following policies are relevant to the site in landscape terms:

9.16 Policy 12: Green Infrastructure, which states that:

"1. Development that will result in the creation of new Green and Blue Infrastructure (GBI) and/or contribute to the protection, management, enhancement and connectivity of existing GBI will be supported; the potential for GBI within the Neighbourhood Area is illustrated diagrammatically in Figure 12..

2. As appropriate to their scale, nature and location, development proposals for major developments must:

- i. identify the existing GBI within and around the development site, and*
- ii. demonstrate how GBI has been incorporated into the proposal, and*
- iii. assess and address how the proposal will benefit the function and connectivity of GBI through the site and beyond."*

9.17 Policy 13: Biodiversity, which states that:

"Development proposals, including those for field based solar farms. will be expected to deliver at least a 10% improvement in "biodiversity value" within and, where appropriate, beyond the site in order to deliver tangible benefits for biodiversity, including specific attention for protected species. Proposals which deliver a higher Biodiversity Net Gain will be particularly supported.

Where appropriate, development proposals should demonstrate sensitive responses to statutory and non-statutory nature conservation sites (as shown on Figure 13), such as accommodating a buffer zone."

9.18 Policy 17: Trees and Hedgerows, which states that:

"1. Ancient and Veteran Trees: To be supported, development proposals should ensure that there will be no loss or deterioration of the irreplaceable habitats of ancient woodlands (as shown in Figure 16) and ancient or veteran trees found outside ancient woodland, unless the need for and benefits of the development in that location clearly outweigh the loss. A minimum buffer of at least 15 metres in width should be maintained between ancient woodland and any development boundary. A buffer zone around an ancient or veteran tree should be at least 15 times larger than the diameter of the tree.

2. Other Existing Trees and Hedgerows: To be supported, development proposals should ensure that there is no damage to or loss of trees of good arboricultural and amenity value. Existing trees and hedgerows on development sites should be retained where possible and incorporated as placemaking features in new development. Where there is an unavoidable loss of trees on site, the number and type of replacement trees should be informed by the quality and size of trees lost. Integration of existing hedgerows into private curtilage must be avoided where possible.

3. Increased Canopy Cover: Wherever practicable, development proposals on sites outside of the town centre, and greater than 0.5 ha in size, should deliver an increase in site tree canopy

cover. This should be demonstrated through a tree planting plan, and should be delivered through the retention of existing trees and /or the planting of new trees in public areas and in private gardens. Where this approach is not practicable, other green infrastructure features (such as green roofs) appropriate to the site should be provided..”

9.19 Policy 17: Landscape Character, which states that:

“As appropriate to their scale, nature, and location, development proposals will be expected to:

- a. integrate natural features such as trees, hedgerows and the local river systems that contribute to both the landscape character and setting of the development;*
- b. demonstrate that the whole scheme, including hard landscape and planting proposals, draws on local landscape characteristics and features through reference to relevant existing landscape and historic landscape assessments, supplemented by any additional site specific assessments; and,*
- c. respond sensitively to the settlement setting and transition between their edges and countryside and maintain the separate identity of settlements; and,*
- d. conserve or enhance the character, openness, tranquillity and amenity of the open countryside.*

Wiltshire Local Plan – Pre-Submission Draft 2020 – 2038 Regulation 19 (September 2023)

9.20 This plan proposes the allocation of the site under Policy 20, as Land North of the A3102 for 285 dwellings. The policy wordings sets out the following mitigation requirements relevant to landscape and visual matters:

- access from the existing roundabout on the A3102 adjacent to the southern boundary;
- green and blue infrastructure through the development that incorporates new woodland and/or tree planting; and
- provision of a suitable buffer either side of the watercourse that runs south to north through the site through the site.

9.21 In addition, the sites allocation, the following policies are relevant to the site in landscape terms:

9.22 Policy 90 Woodland, hedgerows, and trees, which states that:

“Proposals for major development shall make provision for the retention and enhancement of Wiltshire’s woodlands, hedgerows, and trees, and shall incorporate these assets into development design as part of the wider Green and Blue Infrastructure (GBI) Network, by:

- 1. contributing to the tree planting targets of Wiltshire Council’s Climate Strategy and woodland, hedgerow and tree strategy, following the principles of ‘Right Tree, Right Place’;*
- 2. supporting the economic benefits of woodland and tree planting from agroforestry, leisure, tourism as well as wider ecosystem services such as natural flood management and climate resilience;*
- 3. where applicable, supporting the aims and objectives of the Great Western Community Forest;*
- 4. where applicable and acceptable in highway terms, ensuring on major developments that tree lined streets, community orchards and garden tree planting, are fully integrated into proposals;*

5. seeking, where applicable, to increase woodland and street tree cover in existing urban areas in Wiltshire to create shade, mitigate storm water runoff, improve air quality, sequester carbon, and improve the health and well-being of local communities;

6. ensuring the long-term sustainability of woodland, hedgerow, and tree planting, through the appropriate specification of plants, planting accessories, soil volumes, and long-term management to ensure the establishment to maturity of planting schemes in Wiltshire and minimise wastage.”

9.23 Policy 91 Conserving and enhancing Wiltshire's landscapes, which states that:

“Development will conserve and where possible enhance Wiltshire’s landscapes by:

1. being located and designed to respect landscape character and maintain an area’s distinctive sense of place and reinforce local distinctiveness as set out in the Wiltshire Landscape Character Assessment and landscape strategy;

2. conserving, enhancing, and restoring the characteristics and views of landscapes along with valued attributes and existing site features such as trees, hedgerows, dry stone walls and waterbodies that contribute to the character and quality of the area;

3. conserving and enhancing the locally distinctive character of settlements and their landscape settings;

4. conserving and enhancing the transition between man-made and natural landscapes at the urban fringe;

5. being of high-quality design appropriate to its townscape and landscape context in accordance with the National Design Guidance and Wiltshire Design Guide, that incorporates green and blue infrastructure, supports climate resilience, biodiversity enhancement, and health and wellbeing of the local community;

6. be located and designed to prevent erosion of relative tranquillity (light pollution and noise) and intrinsically dark landscapes, and use opportunities to enhance areas in which tranquillity have been eroded;

7. where necessary, being supported by a proportionate Landscape and Visual Impact Assessment, Landscape and Visual Appraisal, or Townscape Appraisal that shows how, through an iterative process that has considered the site context, this has helped integrate and enhance the proposed development;

8. protecting geology and soils that underpin the landscape character of Wiltshire enhancing healthy ‘living’ soils as the foundation for successful plant growth, natural carbon sequestration, groundwater storage and filtration, as well as all eco-system services.

Wiltshire’s designated landscapes Great weight will be given to conserving and enhancing the landscape and scenic beauty of Wiltshire’s designated landscapes, Areas of Outstanding Natural Beauty and the New Forest National Park. Development within, and influencing the setting of, these designated areas should be limited in scale and extent and are expected to contribute towards conserving and enhancing their natural beauty.

Proposals for development within or affecting designated landscapes must demonstrate that they have taken account of the objectives, policies and actions set out in the relevant management plans for these areas. Proposals for development outside of an Area of Outstanding Natural Beauty that is sufficiently prominent (in terms of its siting or scale) to have an impact on the area’s special qualities, as set out in the relevant management plan, must also demonstrate that it would not adversely affect its setting.

Development will not be supported if it cannot demonstrate conservation or enhancement to the landscape character and special qualities of an Area of Outstanding Natural Beauty or National Park.”

9.24 Policy 93 Green and blue infrastructure states that:

“Development shall make provision for the retention and enhancement of Wiltshire’s green and blue infrastructure network and shall ensure that suitable links to the network are provided and maintained.

Proposals for major development will be required to:

- 1. retain and enhance the integrity, quantity, quality and connectivity of existing on site green and blue infrastructure;*
- 2. identify and incorporate opportunities for the creation and extension of the green and blue infrastructure network, ensuring new and existing green and blue infrastructure is well integrated, enhancing strategic connectivity whilst maximising wildlife and ecosystem services;*
- 3. put measures in place to ensure appropriate long-term management, maintenance and funding of any green and blue infrastructure directly related to the development;*
- 4. identify and provide opportunities to enhance and improve linkages between the natural and historic landscapes of Wiltshire;*
- 5. retain and enhance existing public rights of way, maximising accessibility and opportunities for new connections. Existing and new routes shall be integrated into the wider GBI network providing convenient and attractive links throughout the development and surrounding area.*

Where damage or loss of existing green or blue infrastructure is unavoidable, only the minimum necessary shall be removed. Any loss must be mitigated through the creation of new or replacement green and/or blue infrastructure equal to or above its current value and quality, that maintains the integrity and functionality of the green and blue infrastructure network. Green and blue infrastructure projects and initiatives that contribute to the delivery of a high quality and highly valued multi-functional green and blue infrastructure network in accordance with the Wiltshire Green and Blue Infrastructure Strategy and GBI Settlement Frameworks will be supported. Developer contributions to support such initiatives will be required where appropriate.”

Other relevant documents

9.25 Documents listed within the evidence base for the Local Plan include the following:

- Wiltshire County Landscape Character Assessment (2005);
- West Wiltshire District Landscape Character Assessment (2007);
- Wiltshire Local Plan Review: Site Landscape Appraisals (2023); and
- Melksham Neighbourhood Plan Local Landscape Character Neighbourhood Plan Evidence Base Report (2020).

County Landscape Character Assessments

9.26 The site is covered by both the Wiltshire County Landscape Character Assessment (2005) and the West Wiltshire District Landscape Character Assessment (2007). Whilst there is much overlap between these two documents for the Melksham area, their concluding categorisation of landscape character types differs. For the purposes of this assessment the landscape character is derived from the most recent West Wiltshire Landscape Character Assessment.

9.27 The site falls within Landscape Type (LT) 12: Open Clay Vale which contains the open lowland centred on the floodplains of the Rivers Thames and Avon.

9.28 The key characteristics of the Open Clay Vale LT are:

- "Level land form with wide open skies and views to ridges and downs; Pastoral land use with some arable; Large scale geometric fields with hedgerows or open drainage channels defining boundaries;
- Presence of rivers, tributaries, drainage channels and open water bodies;
- Watercourses lined with riparian vegetation with prominent lines of willows (some pollarded);
- Floristically rich hay meadows;
- Settlement pattern varies from large towns and small scattered villages to sparse farmsteads;
- Buildings in varied materials of brick, render and stone;
- Crossed by major transport corridors, and a network of minor roads linking settlements;
- Historic use for transport evident in canals."

9.29 This LT is further subdivided into Landscape Character Areas (LCA). These are discrete geographic areas that possess the common characteristics described for the LT. The site lies within LCA 12B: Avon Open Clay Vale, which is described as:

"Avon Open Clay Vale is an extended area following the course of the River Avon from Great Somerford in the north to Bradford on Avon in the south. As well as the Avon the area is characterised by the presence of other rivers, tributary streams, lakes, and, to the south, the Kennet and Avon Canal. The Avon Open Clay Vale is a level, open area with views to the higher ground of the Limestone Ridge to the east. Land is predominantly intensively managed permanent pasture with some arable and small isolated pockets of meadow (such as Sutton Lane Meadow SSSI). Hedgerows, gappy or low flailed in places, enclose fields of varying size. There are sparse hedgerow trees plus willows lines (some pollarded) marking the waterways and poplar shelter belts. Sections of the area remain rural and tranquil despite major routes travelling through (the M4, A350, A342) plus railway lines in cuttings and embankments and the visual influence of modern large scale development on the edges of Chippenham, Trowbridge and Melksham. This urbanising influence is particularly prevalent to the south of the area while the northern section is more akin to area 12A with scattered settlement of small brick and stone built villages and farmsteads."

9.30 The local landscape within the study area generally follows the above description. The field parcels are defined by the intensive land use and the flat landform is defined by the abundance of streams and watercourses in the area. Due to its agricultural land use with few defining landscape features beyond field boundary hedgerows and the noticeable influence of Melksham, the LCA is considered to have medium value. There is a noticeable presence of residential development, which has an urbanising influence on the surrounding landscape. The LCA's susceptibility to residential development is reduced within the context of the existing settlements.

Melksham Neighbourhood Plan Local Landscape Character Neighbourhood Plan Evidence Base Report (2020)

9.31 The Local Landscape Character Neighbourhood Plan Evidence Base Report (EBR) forms part of the evidence base to support content and policies in the adopted Joint Melksham Neighbourhood Plan. The EBR brings together evidence on landscape character and setting, including information from the Wiltshire Local Plan's evidence base in order to identify specific character areas surrounding Melksham. The site falls within 'Area 3: Open Clay Vale'.

9.32 The key characteristics of Area 3: Open Clay Vale are identified as:

- "Flat, low-lying landscape (in places adjacent to the floodplain of the River Avon)";

- “Mixed use farmland, with ‘horsey culture’ as a significant element to the east of Melksham”;
- “General sense of openness throughout the character area”;
- “Road corridors lined in places with mature deciduous hedgerows and telegraph poles”;
- “Pylons are also visible as dominant vertical elements in certain parts of the character area and large areas of solar farms are located in areas to the East of the Neighbourhood Plan area”;
- “Comprehensive footpath network”;
- “Narrow rural routeways”;
- “Scattered settlement pattern, with isolated farmsteads”; and
- “Brooks and stream corridors scattered across the landscape – notably Clackers Brook.”

Wiltshire Local Plan Review: Site Landscape Appraisals 2023

9.33 The site is considered as part of the Wiltshire Local Plan Review: Sites Landscape Appraisals as part of site ME17. Overall, the site it is considered to be medium sensitivity to housing development. With medium capacity to accommodate housing development. The appraisal considers the potential significant adverse effects as:

- Potential for development to form a conspicuous, large scale urban extension into the lower river valley that encroaches east across the clay vale towards the distinctive elevated greensand hills;
- Potential for development to form an abrupt, hard settlement edge that is intrusive in the rural landscape;
- Potential for development to be prominent in the open landscape and alter the character of the large skies;
- Potential loss of vegetation features including low hedgerows and scattered trees that punctuate the large-scale, open landscape;
- Potential alteration to the open character and route of the watercourse through the site.

9.34 The appraisal considers the scope for mitigation and opportunities for beneficial effects as follows:

- Avoid development that would introduce uncharacteristic, large scale buildings within the lower clay vale landscape that would be highly conspicuous, in particular from the elevated greensand hills;
- Introduce strategic green fingers through the development that incorporate new woodland and/or tree planting, to help break up large scale urban massing, contain and soften the new settlement edge and provide an appropriate transition with countryside, especially where this supports landscape character guidance;
- Limit development in the east of the site and create a landscape buffer that forms an appropriate, transitional settlement edge to the rural landscape;
- Avoid tall development that would form prominent urban features that break the skyline;
- Retain and enhance hedgerows and trees as part of a mature landscape framework that links between Melksham and the wooded hills to the east;
- Limit development in proximity to the watercourse in order to maintain a setting to this local landscape feature through the site.
- Seek opportunities to create biodiverse, accessible and connected greenspaces throughout the development that conserve and augment existing vegetation and public rights of way as part of the landscape strategy for the site, in order to contribute to placemaking quality, to appropriately integrate local landscape features (such as the watercourse) within development and to provide effective landscape transitions between urban settlement edges and surrounding countryside;

- Seek opportunities to conserve, restore and augment hedgerows and trees as part of the landscape strategy for the site, to create a well-integrated, soft settlement edge that maintains separation of the settlement edge from the rural countryside;
- Seek opportunities to screen visually intrusive development where appropriate with the landscape character;
- Seek opportunities to enhance the interface between existing eastern settlement areas and the countryside,
- considering low-lying landscape transition to rising, wooded hills and creating a generally soft, well-integrated settlement edge;
- Seek opportunities to remove visually intrusive electricity pylons and overhead power lines that cross the site.

ASSESSMENT METHODOLOGY

9.35 Provided within this section is an abridged methodology for the LVIA. An unabridged version can be found at Annex EDP 1 of Appendix 9.1 along with a Glossary of Terms.

Relevant Guidance

9.36 The assessment methodology for assessing landscape and visual effects prepared by EDP is principally based on the following best practice guidance:

- Guidelines for Landscape and Visual Impact Assessment – Third Edition (LI/IEMA, 2013);
- Landscape Character Assessment – Guidance for England and Scotland (Swanick & LUC, 2002) produced on behalf of the Countryside Agency and Scottish Natural Heritage; and
- Photography and photomontage in landscape and visual impact assessment (Landscape Institute Advice Note 01/11)

9.37 The nature of landscape and visual assessment requires both objective analysis and subjective professional judgement. Accordingly, the following assessment is based on the best practice guidance listed above and information and data analysis techniques.

9.38 It uses subjective professional judgement and quantifiable factors wherever possible and is based on clearly defined terms (see Glossary of Terms, Annex EDP 1 of Appendix 9.1).

Landscape Assessment

9.39 Potential landscape effects derive from changes in the physical landscape fabric that may contribute to changes in its character and how this is experienced. These effects need to be considered in line with changes already occurring within the landscape, and which help define the character of it.

9.40 Potential effects upon the wider landscape resource, i.e. the landscape surrounding the development, requires an assessment of visibility of the proposals from adjacent landscape character areas, but this still remains an assessment of landscape character and not visual amenity.

Visual Assessment

9.41 The assessment of potential effects on visual amenity draws on the predicted effects of the Proposed Development, the landscape and visual context, and the visibility and viewpoint analysis. It considers the significance of the overall effects of the Proposed Development on the visual amenity of the main visual receptor types in the study area.

Identifying Landscape and Visual Receptors

- 9.42 This assessment has sought to identify the key landscape and visual receptors that may be affected by the changes proposed.
- 9.43 The assessment of effects on landscape (as a resource in its own right) draws on the description of the development, the landscape context and the visibility and viewpoint analysis to identify receptors, which, for the Proposed Development may include, but not be limited to, the following:
- A. The landscape fabric of the application site;
 - B. The key landscape characteristics of the local context;
 - C. The 'host' landscape character area, which contains the proposed development;
 - D. The 'non-host' landscape character areas where there is the potential for secondary effects beyond the host landscape character area (this is only undertaken where effects may extend beyond the host character area); and
 - E. Landscape designations on a national, regional or local level (where relevant).
- 9.44 The locations and types of visual receptors within the defined study areas are identified from Ordnance Survey (OS) maps and other published information (such as walking guides), from fieldwork observations and from local knowledge provided during the consultation process. Examples of visual receptors may include, but not be limited to, the following:
- a. Settlements and private residences;
 - b. Users of National Cycle Routes and National Trails;
 - c. Users of local/regional cycle and walking routes;
 - d. Those using local rights of way – walkers, horse riders, cyclists;
 - e. Users of open spaces with public access;
 - f. People using major (motorways, A and B) roads;
 - g. People using minor roads; and
 - h. People using railways.

Assessment of Landscape and Visual Effects

- 9.45 The assessment of effects on the landscape resource includes consideration of the potential changes to those key elements and components that contribute towards recognised landscape character or the quality of designated landscape areas, these features are termed 'landscape receptors'. The assessment of visual amenity requires the identification of potential visual receptors that may be affected by the Proposed Development.
- 9.46 As noted above, following the identification of these various landscape and visual receptors, the effect of the Proposed Development on each of them is assessed through consideration of a combination of:
- *"Their overall sensitivity to the proposed form of development that includes the value attached to the receptor following the baseline appraisal, combined with the susceptibility of the receptor to the change proposed, determined during the assessment stage; and*
 - *The overall magnitude of change that will occur - based on the size and scale of the change, its duration and its reversibility."*

Defining Receptor Sensitivity

- 9.47 A number of factors influence professional judgement when assessing the degree to which a particular landscape or visual receptor can accommodate change arising from a particular development. Sensitivity is made up of judgements regarding the 'value' attached to the receptor, which is determined at baseline stage, and the 'susceptibility' of the receptor, which is determined at the assessment stage when the nature of the proposals, and therefore the susceptibility of the landscape and visual resource to change is better understood.
- 9.48 Susceptibility indicates "the ability of a defined landscape or visual receptor to accommodate the specific Proposed Development without undue negative consequences"⁴¹. Susceptibility of visual receptors is primarily a function of the expectations and occupation or activity of the receptor. A degree of professional judgement applies in arriving at the susceptibility for both landscape and visual receptors and this is clearly set out in the technical annexes to this assessment.
- 9.49 A location may have different levels of sensitivity according to the types of visual receptors found there and any one receptor type may be accorded different levels of sensitivity at different locations.
- 9.50 Therefore, where the susceptibility of a receptor to the type of development proposed may result in a change to the 'inherent' value of that receptor or location, this is made explicit within the assessment text contained at Appendices 9.2 and 9.3.
- 9.51 Table 9.1 (below) provides an indication of the criteria by which the overall sensitivity of a landscape receptor is judged within this assessment and considers both value and susceptibility independently.

TABLE 9.1 LANDSCAPE SENSITIVITY

CATEGORY	LANDSCAPE RECEPTOR VALUE CRITERIA	LANDSCAPE SUSCEPTIBILITY TO CHANGE CRITERIA
Very High	Nationally/internationally designated/valued countryside and landscape features; strong/distinctive landscape characteristics; absence of landscape detractors.	Strong/distinctive landscape elements/aesthetic/-perceptual aspects; absence of landscape detractors; landscape receptors in excellent condition. Landscapes with clear and widely recognised cultural value. Landscapes with a high level of tranquillity.
High	Locally designated/valued countryside (e.g. Areas of High Landscape Value, Special Landscape Areas (SLA), Regional Scenic Areas) and landscape features; many distinctive landscape characteristics; very few landscape detractors.	Many distinctive landscape elements/aesthetic/-perceptual aspects; very few landscape detractors; landscape receptors in good condition. The landscape has a low capacity for change as a result of potential changes to defining character.
Medium	Undesignated countryside and landscape features; some distinctive landscape characteristics; few landscape detractors.	Some distinctive landscape elements/aesthetic/-perceptual aspects; few landscape detractors; landscape receptors in fair condition. Landscape is able to accommodate some change as a result.

⁴¹ Landscape Institute and Institute of Environmental Management and Assessment (2013) *Guidelines for Landscape and Visual Impact Assessment, Third Edition* Page 158.

Low	Undesignated countryside and landscape features; few distinctive landscape characteristics; presence of landscape detractors.	Few distinctive landscape elements/aesthetic/-perceptual aspects; presence of landscape detractors; landscape receptors in poor condition. Landscape is able to accommodate large amounts of change without changing these characteristics fundamentally.
Very Low	Undesignated countryside and landscape features; absence of distinctive landscape characteristics; despoiled/-degraded by the presence of many landscape detractors.	Absence of distinctive landscape elements/-aesthetic/perceptual aspects; presence of many landscape detractors; landscape receptors in very poor condition. As such landscape is able to accommodate considerable change.

9.52 For visual receptors, judgements of susceptibility and value are more closely interlinked considerations.

9.53 For example, the most valued views are those that people go and visit because of the available view – and it is at those viewpoints that their expectations will be highest and thus most susceptible to change.

9.54 For this reason, the sensitivity of visual receptors is rated in a single step process, which combines both susceptibility and value as indicated by the criteria in Table 9.2.

TABLE 9.2 VISUAL SENSITIVITY

CATEGORY	VISUAL RECEPTOR CRITERIA
Very High	Designed (i.e. deliberately created) view (which may be to or from a recognised heritage asset or other important viewpoint), or where views of the surroundings are an important contributor to the experience. Key promoted viewpoint e.g. interpretative signs. References in literature and art and/or guidebooks tourist maps. Protected view recognised in planning policy designation. Examples may include views from residential properties, especially from rooms normally occupied in waking or daylight hours; national public rights of way (PRoW) e.g. National Trails and nationally designated countryside/landscape features with public access, which people might visit purely to experience the view; and visitors to heritage assets of national importance.
High	View of clear value but may not be formally recognised e.g. framed view of high scenic value, or destination hill summits. It may also be inferred that the view is likely to have value e.g. to local residents. Examples may include views from recreational receptors where there is some appreciation of the landscape e.g. golf and fishing; local public rights of way, access land and National Trust land, also panoramic viewpoints marked on maps; road routes promoted in tourist guides for their scenic value, plus main roads within nationally important landscapes (e.g. AONBs or National Parks).
Medium	View is not promoted or recorded in any published sources and may be typical of the views experienced from a given receptor. Examples may include people engaged in outdoor sport other than appreciation of the landscape e.g. football and rugby, or road users on minor routes passing through rural or scenic areas.
Low	View of clearly lesser value than similar views experienced from nearby visual receptors that may be more accessible.

	Examples may include road users on main road routes (motorways/A roads) and users of rail routes or people at their place of work (where the place of work may be in a sensitive location). Also views from commercial buildings where views of the surrounding landscape may have some limited importance.
Very Low	View affected by many landscape detractors and unlikely to be valued. Examples may include people at their place of work, indoor recreational or leisure facilities or other locations where views of the wider landscape have little or no importance.

9.55 The tables above offer a template for assessing overall sensitivity of any landscape or visual receptor, as determined by combining judgements of their susceptibility to the type of change or development proposed and the value attached to the landscape or view as set out at paragraph 5.38 of GLVIA 3rd Edition (2013).

9.56 However, the narrative in this report may demonstrate that assessment of overall sensitivity can change on a case-by-case basis. For example, a high susceptibility to change and a low value may result in a medium overall sensitivity, unless it can be demonstrated that the receptor is unusually susceptible or is in some particular way more valuable. A degree of professional judgement applies in arriving at the overall sensitivity for both landscape and visual receptors.

Magnitude of Change

9.57 The magnitude of any landscape or visual change is determined through a range of considerations particular to each receptor. The three attributes considered in defining the magnitude are:

- Scale of change;
- Geographical extent; and
- Duration and reversibility/proportion.

9.58 Receptor locations from which views of the Proposed Development are not likely to occur will receive no change and therefore no effect. With reference to the Zone of Theoretical Visibility (ZTV) and site survey, the magnitude of change is defined for receptor locations from where visibility of the Proposed Development is predicted to occur.

9.59 Table 9.3 provides an indication of the criteria by which the size/scale of change at a landscape or visual receptor is judged within this assessment.

TABLE 9.3 SCALE OF CHANGE CRITERIA

CATEGORY	LANDSCAPE RECEPTOR CRITERIA	VISUAL RECEPTOR CRITERIA
Very High	Total loss of or major alteration to key elements/features/characteristics of the baseline condition. Addition of elements which strongly conflict with the key characteristics of the existing landscape.	There would be a substantial change to the baseline, with the Proposed Development creating a new focus and having a defining influence on the view.
High	Notable loss of or alteration to one or more key elements/features/-characteristics of the baseline condition. Addition of elements that are prominent and may conflict with the key characteristics of the existing landscape.	The Proposed Development will be clearly noticeable and the view would be fundamentally altered by its presence.

Medium	Partial loss or alteration to one or more key elements/features/characteristics of the baseline condition. Addition of elements that may be evident but do not necessarily conflict with the key characteristics of the existing landscape.	The Proposed Development will form a new and recognisable element within the view, which is likely to be recognised by the receptor.
Low	Minor loss or alteration to one or more key elements/features/characteristics of the baseline landscape. Addition of elements that may not be uncharacteristic within the existing landscape.	The Proposed Development will form a minor constituent of the view being partially visible or at sufficient distance to be a small component.
Very Low	Barely discernible loss or alteration to key elements/features/characteristics of the baseline landscape. Addition of elements not uncharacteristic within the existing landscape.	The Proposed Development will form a barely noticeable component of the view, and the view whilst slightly altered would be similar to the baseline situation.

9.60 Table 9.4 provides an indication of the criteria by which the geographical extent of the area will be affected within this assessment.

TABLE 9.4 GEOGRAPHIC EXTENT

LANDSCAPE RECEPTORS	VISUAL RECEPTOR CRITERIA
Large scale effects influencing several landscape types or character areas.	Direct views at close range with changes over a wide horizontal and vertical extent.
Effects at the scale of the landscape type or character areas within which the proposal lies.	Direct or oblique views at close range with changes over a notable horizontal and/or vertical extent.
Effects within the immediate landscape setting of the site.	Direct or oblique views at medium range with a moderate horizontal and/or vertical extent of the view affected.
Effects at the site level (within the Application site itself).	Oblique views at medium or long range with a small horizontal/vertical extent of the view affected.
Effects only experienced on parts of the site at a much localised level.	Long range views with a negligible part of the view affected.

9.61 The third, and final, factor in determining the predicted magnitude of change is a combination of duration and reversibility. Duration and reversibility are separate but linked considerations. Duration is judged according to the defined terms set out below, whereas reversibility is a judgement about the prospects and practicality of the particular effect being reversed in, for example, a generation.

9.62 The categories used in this assessment are set out below:

Duration

- Long term (20 years+);
- Medium to long term (10 to 20 years);

- Medium term (5 to 10 years);
- Short term (1 year to 5 years); and
- Temporary (less than 12 months).

Reversibility

9.63 Reversibility is defined as follows:

- Permanent with unlikely restoration to original state, e.g. major road corridor, power station, urban extension etc.;
- Permanent with possible conversion to original state, e.g. agricultural buildings, retail units;
- Partially reversible to a different state, e.g. mineral workings;
- Reversible after decommissioning to a similar original state, e.g. wind energy development; or
- Quickly reversible, e.g. temporary structures.

Assessment of Significance

9.64 The purpose of the EIA process is to identify the likely significant environmental effects (both beneficial and adverse) arising from development proposals. Schedule 4 to the EIA Regulations specifies the information to be included in all ES, which should include a description of:

“...the likely significant effects on the factors specified in regulation 4(2) should

cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development. ...”

9.65 In order to consider the likely level of any effect, the sensitivity of each receptor is combined with the predicted magnitude of change, with reference also made to the geographical extent, duration and reversibility of the effect within the assessment.

9.66 Having taken such a wide range of factors into account when assessing sensitivity and magnitude at each receptor, the level of effect can be derived by combining the sensitivity and magnitude in accordance with the matrix in Table 9.5.

TABLE 9.5 LEVEL OF EFFECTS MATRIX

OVERALL SENSITIVITY	OVERALL MAGNITUDE OF CHANGE				
	Very High	High	Medium	Low	Very Low
Very High	Substantial	Major	Major/- Moderate	Moderate	Moderate/- Minor
High	Major	Major/- Moderate	Moderate	Moderate/ Minor	Minor
Medium	Major/- Moderate	Moderate	Moderate/- Minor	Minor	Minor/- Negligible
Low	Moderate	Moderate/- Minor	Minor	Minor/- Negligible	Negligible

Very Low	Moderate/- Minor	Minor	Minor/- Negligible	Negligible	Negligible/- None
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- 9.67 Each effect is described and evaluated individually through the combination of all of the relevant factors and assessed as either significant or not significant. Landscape and visual effects identified at substantial, major, major/moderate or moderate levels (bold type within the matrix above) are generally considered to be significant, whereas those effects assessed at moderate/minor, minor, minor/negligible or negligible level are considered to be not significant.
- 9.68 In certain cases, where additional factors may arise, a further degree of professional judgement may be applied when determining whether the overall change in the view will be significant or not and, where this occurs, this is explained in the assessment.

Definition of Effects

- 9.69 Taking into account the levels of effect described above, and with regard to effects being either adverse or beneficial, Table 9.6 represents a description of the range of effects likely at any one receptor.

TABLE 9.6 DEFINITION OF EFFECTS MATRIX

EFFECT	DEFINITION
Substantial	Changes resulting in a complete variance with the landscape resource or visual amenity.
Major	Changes resulting in a fundamental change to the landscape resource or visual amenity.
Moderate	A material but non-fundamental change to the landscape resource or visual amenity.
Minor	A slight but non-material change to the landscape resource or visual amenity.
Negligible	A detectable but non-material change to the landscape resource of visual amenity.
None	No detectable change to the landscape resource or visual amenity.

Nature of Effect

- 9.70 Effects can be adverse (negative), beneficial (positive) or neutral. The landscape effects will be considered against the landscape baseline, which includes published landscape strategies or policies if they exist. Changes involving the addition of large scale man-made objects are typically considered to be adverse, as they are not usually actively promoted as part of published landscape strategies. Accordingly, landscape effects as a result of these aspects of the Proposed Development will be assumed to be adverse, unless otherwise stated within the assessment.
- 9.71 Visual effects are more subjective as people's perception of development varies through the spectrum of negative, neutral and positive attitudes. In the assessment of visual effects, the assessor will exercise objective professional judgement in assessing the level of effects and, unless otherwise stated, will assume that all effects are adverse, thus representing the worst-case scenario.

Cumulative Effects

- 9.72 Cumulative effects generally occur where there may be combined or sequential visibility of two or more developments of the same type and scale, or where the consideration of other schemes would increase an effect identified. Where other schemes are relevant, these are considered in conjunction with the proposed scheme.

Field Surveys

- 9.73 A number of field assessments of local site circumstances, including photographic survey of the character and visual context of the application site and its surroundings have been undertaken between September 2022 and January 2024 in order to gather robust baseline information. Field assessments were undertaken in near-winter conditions and have, therefore, been undertaken, as far as is practicable, in accordance with best practice guidance, which states that such assessments should be undertaken when the leaves are absent from the majority of trees/vegetation and visibility is at its greatest.
- 9.74 These field-based assessments were undertaken by a Landscape Architect, with appropriate experience of the relevant guidance.

Limitations and Assumptions

- 9.75 Baseline conditions have been established using existing assessments, available documentation and field assessment; it is important to note that this information may change before or during the construction and operation of the Proposed Development.
- 9.76 Within reasonable limits, the assessment is undertaken in consideration of the 'worst case' scenario for the development, i.e. those potential outcomes, situations or locations that would result in the most profound effect on landscape and visual receptors. It therefore identifies the greatest degree of change likely to accrue and may be subject to mitigating factors or alternative conditions that might reduce those effects. For example, visual effects are considered in both summer and winter contexts, although the level of effect is expressed for winter landscape conditions when trees are bare of leaf cover and the visibility of development is at its greatest. Where this is the case, the assessment identifies alternative conditions or further mitigation that might result in impacts being less pronounced.
- 9.77 The assessment of potentially significant effects applies a pre-determined methodology to arrive at its conclusions (Appendix 9.1, Appendix EDP 1). This procedure brings a degree of objective, procedural rigour into what otherwise might be judged to be 'personal opinion'. Certainly, professional judgement still plays its part, but the purpose of adopting a methodology is to make the process as clear and logical as possible.

Consultations

- 9.78 Consultation principally involved discussions regarding the selection of representative viewpoints, assessment methodology, photomontage selection and the landscape response.
- 9.79 During the EIA scoping process, Wiltshire Council were consulted on the methodology and associated terminology for undertaking the LVIA and representative viewpoint selection. This correspondence included the best practice by which EDP prepares all its assessments.
- 9.80 In order to properly assess the effects of the proposal in landscape terms, EDP has conducted a review of relevant planning policy and landscape designations to identify what 'value' the local authority places on the landscape. This review focuses on local plan policy, since such policy is (a) more specific to the site and (b) reflects the regional and national advice regarding landscape issues.

BASELINE CONDITIONS

- 9.81 A detailed description of the baseline situation at and around the site is set out in Appendices 9.1, sections 3 (Landscape Resource) and 4 (Visual Baseline). Provided below is a summary of the baseline for the study area.

Site Description

- 9.82 The site boundary, outlined in red, is shown on Figure EDP 9.1 of Appendix 9.1. which also illustrates the site's character and local context.
- 9.83 The site is located to the north-east of Melksham and centred on Grid Reference ST 92003 64414. The site comprises irregularly shaped field parcels that are divided by typical managed hedgerows and a small brook that crosses the site. The site is bound by managed hedgerows to the north, east and south. The western boundary is formed by a hedgerow that runs along residential properties and gardens. New Road follows the site's eastern boundary and the A3102 Sandridge Common follows the southern boundary.

Landscape Character

Overall Sensitivity of LCA 12B: Avon Open Clay Vale

- 9.84 The susceptibility of the landscape and townscape resource is defined as the ability of the receptor (whether the overall character, individual fabric elements or perceptual aspects) to accommodate the proposed development without undue consequences for the maintenance of the baseline situation. The landscape found within the study area is broadly representative of what is described in the LCA 12B description. There is an influence of agricultural land use, and the landform is generally flat due to the presence of water courses. Local settlements have considerable influence on the landscape and introduce built form into the local area. The landscape contains typical field boundaries which are largely intact and create consistent structure throughout the landscape. Due to the existing areas of residential development, the susceptibility to residential built form on the settlement edge is reduced. The LCA is therefore considered to have medium sensitivity.

Overall Sensitivity of Area 3: Open Clay Vale

- 9.85 The local landscape in its baseline condition is broadly representative of what is described for Area 3. The existing land use and abundance of watercourses influences the landform and pattern of vegetation in the local landscape. Settlement areas have noticeable influence on the landscape character and there is a perceivable context of residential built form. The landscape is considered to have high value, since field boundaries are generally intact and there is consistent structure across the landscape. However, the existing areas of residential development reduce the susceptibility to residential built form on the settlement edge. The LCA is therefore considered to have medium sensitivity.

Overall Sensitivity of the Site Character

- 9.86 In summary, the main character and valuable fabric of the site is to be found in the hedgerow boundaries and the existing watercourse in the centre of the site. The site is not publicly accessible and therefore has no recreational value. Due to its location on the settlement edge, the site is strongly influenced by built form. The site is therefore considered to have medium value in landscape terms.
- 9.87 Whilst there are some higher quality elements within the site, namely the landscape features at the site boundaries, the settlement edge location means perceptually the site is impacted by the adjacent housing and poor-quality boundary treatments. The site is partly urbanised by existing built form immediately adjacent to it. The landscape of the site itself is considered to be of medium susceptibility to the change proposed. Therefore, the site is considered to have medium sensitivity.

Visual Resource

Rights of Way Users

- 9.88 There is an extensive network of PRow across the study area as illustrated on Figure 9. 5. Footpath MELW60 is located to the north of the site and has partial views of the site and built form on the boundary of the site (as shown in Photoviewpoint EDP 1). To the west of the footpath, views of the site are filtered due to existing tree cover along field boundaries beyond the site boundary (As shown in Photoviewpoint EDP 2).
- 9.89 From the north, mid-range views of the site from PRow are predominately screened and filtered due to existing vegetation patterns creating a layering effect within the low-lying landscape. As illustrated by Photoviewpoint EDP 10, there are no direct views of the site from this location. In long distance views, the intervening vegetation provides an effective visual screen which limits visibility across the local landscape (as shown in Photoviewpoint EDP 11).
- 9.90 There are limited footpaths to the east of the site. Bridleway MELW26 to the south-east has views towards the settlement edge and the site (as shown in Photoviewpoint EDP 5). Due to the local landform and intervening woodland to the east, there would be limited to no views towards the site in the middle distance.
- 9.91 Residential built form restricts views to the south of the site. Due to the predominantly flat landform and existing vegetation, there are filtered views from further afield. Vegetation creates a layering effect in long distance views which restricts views beyond the middle distance. As shown in Photoviewpoint EDP 9, there are no views of the site from this location. It is considered that, due to the focus on the surrounding landscape and interest in the local area, users of local PRow throughout the study area, although with some de sensitisation where views are possible of existing built form, large man-made features, or busy/major transport corridors, are considered to be high sensitivity receptors.

Road Users

New Road

- 9.92 New Road lies to the north-east of Melksham and connects to the A3102 in the south and Woodrow Road in the north. The road cuts across the local landscape with fields on either side, with few residential buildings and isolated farmsteads along the road. The road is lined by hedgerows on both sides which typically have a drainage ditch alongside them. The southern third of the road follows the site's eastern boundary. Hedgerow field boundaries are generally of a varying height and in variable condition depending on the management and cutting regime applied to them. Surrounding the site, hedgerows are high which results in the road feeling enclosed (as shown in Photoviewpoint EDP 3). There are glimpsed views of the site where there are gaps in the hedgerow to allow access into the agricultural land. Built form within the site and tree cover along field boundaries can be seen from the road.

Sandridge Road/Sandridge Common (A3102)

- 9.93 The A3120 lies to the south of the site and is the main approach to Melksham from the east. It is surrounded by farmland, with woodland blocks further to the east. There is an increase in residential built form closer to Melksham, including isolated farmsteads (as shown in Photoviewpoint EDP 4). The road meets New Road before entering a roundabout on the settlement edge which is visually influenced by residential development along Eastern Way and within the settlement boundary. The site lies to the north of eastern way and abuts the settlement edge to the west. The western part of the A3102 follows the southern boundary of the site and is lined by a hedgerow to the north, and the curtilage of residential dwellings (including parking areas, access and front gardens) to the south. Where there are gaps in the hedgerow there are views into the site (as shown in Photoviewpoint EDP 7). From within the settlement, views along the road looking east are dominated by existing

dwelling, which are a mixture of bungalows and 2-2.5 storey detached and semi-detached houses. The site is not visible from within the settlement (as shown in Photoviewpoint EDP 8).

Rural Lanes

- 9.94 There is a network of rural lanes present in the local landscape. Visibility across the study area is dependent on the existing vegetation and built form – due to the flat landscape there are few expansive views from public vantage points across the landscape. Generally, views of the site experienced by vehicle receptors on rural lanes are glimpsed and heavily filtered. Beyond the middle-distance, views of the site are unlikely and would be screened by intervening vegetation and built form in long-distance views (as shown in Photoviewpoint EDP 9).
- 9.95 Overall, road users would experience views while travelling along a road at considerable speed – the A3102 and the majority of rural lanes have a national speed limit except where they are near or within settlement areas. Due to the visual connection with Melksham within the local landscape, the susceptibility to residential development is decreased. Road Users are therefore considered to have low sensitivity within this context.

Settlements and Private Residences

- 9.96 Views from private residential properties, although likely to be of high to very high sensitivity to changes in the view, are not protected by national planning guidance or local planning policy. Accordingly, changes to the character, 'quality' and nature of private views are not a material planning consideration in the determination of a planning application. However, they remain relevant to this review of the predicted extent and nature of visual change, so are reviewed briefly below.
- 9.97 There are three groups of dwellings located within the context of the site. These are:
- Group of dwellings on the settlement edge to the west of the site;
 - Group of dwellings within Melksham to the south of the site;
 - Isolated dwellings on eastern the boundary of the site (New Road Farm); and
 - Residential dwellings along the A3120 to the south-east of the site.
- 9.98 These dwellings are located either within the settlement extents or within a rural setting on the settlement edge. There is a noticeable relationship with existing built form in Melksham and susceptibility to residential development is therefore reduced. Residents are generally considered to have high sensitivity.

POTENTIAL EFFECTS

Assessment of Effects (Construction Phase)

- 9.99 As a consequence of the wholesale change in land use, coupled with the limited time for growth and maturation of new landscape planting, construction activities will result in adverse landscape and visual effects on the fabric and character of the landscape, and on visual amenity, within a limited local area. Whilst construction activities introduce direct and indirect disturbance to both the fabric of the landscape and the surrounding area, which can be perceived by people living, working or travelling through it, these effects are temporary in nature, and can be partially mitigated.
- 9.100 Whilst indicative construction methods and timescales are estimated elsewhere in this ES, full details cannot be defined at this stage. The main elements of the construction operations, considered to be of importance to the landscape and visual assessment, are described below.
- Construction-related traffic: This includes vehicle movements associated with the import of building materials, machinery and labour using local roads:

- Noise effects have the potential to affect landscape character, visual effects from existing (potentially diverted) rights of way and other routes, and residential amenity; and
- Construction activities: Subject to the preferences of individual contractors, it is expected that generic methods will be employed in the implementation of the scheme. Traditional residential building methods are anticipated, although the periodic use of large cranes and construction platforms (rising above the height of buildings) may be necessary.

9.101 Landscape and visual amenity effects resulting from the construction stages are considered to be consistently adverse, as there are few, if any, aspects of the process that could be considered positive in terms of promoted landscape strategies or in visual terms.

9.102 These effects will, however, be temporary and consistent with the progression of construction. Appendix 9.2 (Tables 9.3.1, 9.3.2 and 9.3.3) describes the effects of the construction phase of the Proposed Development on landscape character, visual amenity and residential visual amenity respectively, with these summarised below. Effects on PRoWs, other recreational routes and public highways are described below with reference to the assessed representative viewpoints.

Onsite Landscape Character

9.103 Invariably, the development proposals on a 'greenfield' site, and at the scale proposed at the site, will result in the unavoidable loss of open farmland and removal of characteristic landscape features, in particular agricultural land, at a level that materially alters the character of the receiving environment. In essence, there will be a wholesale change at this stage from an operational agricultural landscape to a construction site.

9.104 As detailed in Appendix 9.2, this change will result in a very high magnitude of change in a medium sensitivity landscape, which will generate a major, temporary, reversible and locally significant adverse effect. This is not the effect upon the wider landscape character area, but solely reflective of the site-based change.

Landscape Character Areas (LCA 12B: Avon Open Clay Vale & Area 3: Open Clay Vale)

9.105 The landscape resource as defined within the Landscape Character Assessment is assessed as being of medium sensitivity.

9.106 Construction activities would not directly affect the wider landscape character area (but would indirectly affect it), as the physical effects of construction (i.e. changes to fabric and character) would be contained within the site, as described above. However, indirect, perceptual effects would occur, principally in relation to lighting, noise, vibration and the movement of materials to/from the Proposed Development, generally in close proximity. Generally, noise/vibration effects would be most acutely perceived by residents adjacent to the site during the early stages of construction, or by those using recreational resources (e.g. PRoW) nearby.

9.107 The effect upon this 'host' LCA within the wider context, as a result of the construction activities expected to occur, would be minor adverse, short-term and reversible, and not significant. Effects would extend only a limited distance to the south and east of the application site in areas that are currently open countryside.

9.108 In consideration of non-host landscape character areas, there would be no significant effects during the construction stage.

9.109 During construction and demolition, trees to be retained would be protected in accordance with those measures outlined in the AIA which accompanies the application. Further details and method statements will be subject to a planning condition. As a result, whilst some limited extent of hedgerow and would be lost as a result of the Proposed Development, no additional tree stock would be lost due to construction or demolition practices.

Rights of Way Users

9.110 As shown on Figure EDP 9.5 (Appendix 9.1), there are a number of views from public rights of way on the site, and the immediate context. There are a number of public rights of way in the rural landscape, these are represented by Photoviewpoints 1, 2, 3, 4, 6, 9, 10, 11, and 12. In instances where the receptors is adjacent to the site there would be a worst case major/moderate adverse effect at a significant level.

Road Users (New Road, Sandridge Road/Sandridge Common (A3102) & Rural Lanes)

- 9.111 Those local road network receptors that have the greatest potential to be affected by the Proposed Development are set out in Appendix 9.1 and 9.2, whilst the effects on the visual amenity of these receptors during construction phases would be as described in Appendix 9.2 through the assessment of representative viewpoints.
- 9.112 The assessment has shown that, during the construction phase, there would be (worst case) moderate (significant) level adverse effects on the local road network, but only in close proximity to the site, and specifically where routes are contiguous with, or in very close proximity to the site boundary, such as is shown at Photoviewpoints, 3, 4, and 7 (medium sensitivity and high magnitude and moderate effect). The changes would result from a revision from open agricultural land to a landscape characterised by construction activities and operations. Effects would be moderate and adverse in nature, short-medium term and local. Whilst most effects will be short term, there may be instances for road users where access points will be used throughout the construction period.

Settlements and Private Residences

- 9.113 By its nature, the urban fringe location of the application site means it is in close proximity to existing settlement, and so the Proposed Development will subsequently generate effects on nearby residences and places of work.
- 9.114 The residential receptors that have the greatest potential to be affected by the Proposed Development are set out in Appendix 9.1 and 9.2; the effects on the residential amenity of these receptors during construction phases would be as described in Appendix 9.2.
- 9.115 The assessment shows that, during the construction phases, there would be significant adverse effects on those residences that lie adjacent, or in close proximity, to the site.
- 9.116 The effect on visual amenity of nearby residences varies between moderate and major adverse and would be significant. The worst of the effects during construction (i.e. the movement and activity of construction vehicles and operations) would be short term in duration, reversible and local. These effects would be short-term on the basis that in any one location the construction would be apparent (in the worst case, i.e. close range) for less than 5 years.

Mitigation during Construction

- 9.117 The hierarchical approach towards mitigation (prevent, reduce, offset) has been to avoid, where possible, any effects through the overall design of the Proposed Development, the disposition of its elements (prevent), and, subsequently through careful siting of the different elements of the Proposed Development and its required infrastructure (reduce) as described in chapter 4 of this ES.
- 9.118 Embedded mitigation provides a form of preventative mitigation, and as discussed above, is that which has been considered as an integral part of the overall design and locational strategy for the Proposed Development. It is not an 'add-on' measure to ameliorate significant environmental effects, but part of the positive and pro-active approach whereby mitigation has been assessed and considered at all stages of the project to prevent or reduce the occurrence of potentially significant environmental effects.

- 9.119 The Proposed Development has been conceived and designed with reference to published Landscape Character Assessments and the Green Infrastructure Parameters Plan (appendix 4.3) for the Proposed Development, as well as site-specific advice regarding landscape and visual matters, thus ensuring mitigation proposed is in line with Local Authority policy, guidance and strategy.
- 9.120 The principal element of the mitigation to address landscape and visual effects will be to secure conditions that ensure the delivery of appropriate controls on scheme plans.
- 9.121 Those mitigation measures pertinent to landscape and visual matters are detailed with reference to the different stages of the Proposed Development below.

Demolition and Construction

- 9.122 The following measures should be implemented during the construction phase of the Proposed Development:
- The adoption of an approved Construction and Environment Management Plan including mitigation designed to avoid significant ecological effects, including those on key landscape features;
 - The adoption of an approved Arboricultural Method Statement (AMS) incorporating best practice guidance set out in British Standard 5837: '2012 Trees in Relation to Design, Demolition and Construction' will ensure retained trees and other vegetation is not adversely affected during the construction process. Further guidance pertaining to arboricultural matters is contained within the AIA which accompanies this application;
 - The use of visual screening, such as hoardings for more sensitive visual receptors in proximity to the application site, including residential receptors that have the greatest potential to be affected by the Proposed Development, as set out in Appendix 9.1 and 2;
 - Existing residents that live adjacent to the application site would be more sensitive to construction lighting due to the proximity, direction and type of receptor. Mitigation measures for construction lighting are likely to include directional fittings and restricted hours of operation; and
 - For reasons of public safety, any informal use of the site for dog walking, etc. should be established, and where evident, would need to be prevented during the construction phase of the development. This would be achieved using protective fencing.

Summary of Effects (Construction Phase)

- 9.123 Generally, the landscape and visual effects during the construction phases of the Proposed Development would be difficult to mitigate due to the nature of these operations. However, as described above, the adoption of approved best practice construction methods will aid in reducing the perception of construction activities for those receptors most likely to be affected.
- 9.124 Notwithstanding the adoption of these measures, and whilst the significance of the effect at some receptors would reduce to a limited degree, at no receptor that would experience a significant unmitigated effect would mitigation reduce the effect to a non-significant level.
- 9.125 The critical issue in considering construction effects is their temporary nature, and thus the short time period for which landscape and visual amenities would be affected to a significant degree.
- 9.126 To summarise, residual significant effects would apply to the following receptors during the construction stage of the project:
- Landscape character and fabric within the site;
 - A number of the residences surrounding the site;

- A number of roads in close proximity to the site; and
- A number of the public rights of way and roads and publicly accessible locations within the immediate site surrounds.

TABLE 9.7 PREDICTED CONSTRUCTION PHASE EFFECTS

RECEPTOR	PREDICTED SIGNIFICANCE OF EFFECT
Landscape Character Assessment	
Landscape Character and Fabric of the application site (Direct Effects)	Major Adverse Temporary Local Significant
Host LCA	Moderate Adverse Temporary Regional Significant
Host Area	Moderate Adverse Temporary Regional Significant
Photoviewpoint EDP 1:	Moderate Adverse Temporary Local Significant
Photoviewpoint EDP 2:	Major/Moderate Adverse Temporary Local Significant
Photoviewpoint EDP 3:	Moderate Adverse Temporary Local Significant
Photoviewpoint EDP 4:	Moderate/Minor Adverse Temporary Local Not Significant

Photoviewpoint EDP 5:	Moderate Adverse Temporary Local Significant
Photoviewpoint EDP 6:	Moderate/Minor Adverse Temporary Local Not Significant Moderate Adverse Temporary Local Significant
Photoviewpoint EDP 7:	Moderate/Minor Adverse Temporary Local Significant
Photoviewpoint EDP 8:	Minor Adverse Temporary Local Not Significant
Photoviewpoint EDP 9:	No Effect
Photoviewpoint 10:	Moderate Adverse Temporary Local Significant Minor Adverse Temporary Local Not Significant

Photoviewpoint 11:	Minor Adverse Temporary Local Not Significant
Photoviewpoint 12:	Moderate/Minor Adverse Temporary Local Significant

Assessment of Effects (Operational Phase)

9.127 The following is an assessment of the post-completion (i.e. at Year 1 before the full effects of mitigation measures are realised) on the landscape resource, visual effects are considered separately below. This section describes the anticipated effects of the Proposed Development during its operational lifetime and assesses the significance of those effects in landscape and visual amenity terms.

9.128 In practical terms, the 'operational lifetime' of the Proposed Development is measured in decades, as it will result in a permanent change to the character of the application site. Given that the Proposed Development includes landscape proposals that will take time to mature, and that all new development can seem 'raw' until it has 'settled' into its landscape context, the assessment of operational effects for specific areas and views will consider the effects at two distinct points in time:

- At the completion of the Proposed Development (referred to here as Year 1); and
- 15 years after completion of the Proposed Development (such that mitigation planting may have matured, and materials weathered).

9.129 It is normally the case that initial (Year 1) effects will be more considerable than those at Year 15 due to the limited initial effect of the strategic landscape proposals incorporated into the Proposed Development during the design process. In combination with the phasing described in earlier sections of this ES, by Year 15 substantial growth should have occurred and these features should be fulfilling their roles more effectively. Furthermore, enhanced mitigation should be achieved in future years as trees, in particular, reach mature size. As a general rule of thumb, vegetation growth of around 300mm per annum can be expected in the early years of establishment, realising upwards of 3-4m of growth after 15 years.

On-site Landscape Character

9.130 Invariably, a development on a 'greenfield' site, and at the scale proposed, will result in the unavoidable loss of open farmland and necessary removal of some characteristic landscape features, in particular some hedgerows and/or hedgerow trees in order to create access into the site, or to allow for development of built form and infrastructure, at a level that has the potential to materially alter the character of the receiving environment. There will also be some level changes to allow for the Sustainable Drainage Scheme as described elsewhere within the planning pack that accompanies this application.

9.131 However, in the case of this site, few existing landscape features will be affected by the proposed development; indeed, the potential exists to deliver a net gain in the number of trees, and the quality of hedgerows, although at Year 1 these would not have achieved their full potential value.

- 9.132 Effects on the landscape character at Year 1 post-completion of the Proposed Development would be as described in Appendix 9.1 with reference to Appendix 9.2 and Appendix 4.3).
- 9.133 The assessment shows that, at Year 1, there would be major (significant) adverse, permanent effects across the application site, arising from a medium sensitivity and very high magnitude. However, the effects would reduce very rapidly with distance and represent a small change to the setting of limited parts of the wider LCA context (indirect effects as described below).

Landscape Character Areas (LCA 12B: Avon Open Clay Vale & Area 3: Open Clay Vale)

- 9.134 The Proposed Development would inevitably extend the settlement into the agricultural landscape to the east of Melksham and also along the main route of approach from settlements to the west of the settlement. This would tend to increase the perception of 'urban character', but the masterplan has been carefully conceived, as have the proposed landscape mitigation measures, to ensure the impacts are moderated, and retained as localised impacts.
- 9.135 Whilst the Proposed Development will result in some indirect change to the perception of the LCA, the extent of change, both in terms of the perceived effects and the extent of the LCA indirectly affected, the overall effects on the host landscape character will be moderate (significant), and will decrease rapidly with distance from the application site boundary, and where intervening development, vegetation and landform provide screening.
- 9.136 This limitation in effects results from the changes experienced within the application site boundary being limited geographically (beyond the site boundary) by the existing and proposed landscape mitigation, as well as the proposed layout, which attempts through good design to achieve a successful integration with the existing settlement pattern and the wider woodland landscape. Essentially, the Proposed Development will only exert a limited influence on the wider LCA when considered as a whole.

Rights of Way Users

- 9.137 As shown on Figure EDP 9.5 (Appendix 9.1), there are a number of views from public rights of way on the site, and the immediate context. There are a number of public rights of way in the rural landscape, these are represented by Photoviewpoints 1, 2, 3, 4, 6, 9, 10, 11, and 12. In instances where the receptor is adjacent to the site there would be a worst case major/moderate adverse effect at a significant level.

Road Users (New Road, Sandridge Road/Sandridge Common (A3102) & Rural Lanes)

- 9.138 Those local road network receptors that have the greatest potential to be affected by the Proposed Development are set out in Appendix 9.1 and 9.2, whilst the effects on the visual amenity of these receptors during construction phases would be as described in Appendix 9.2 through the assessment of representative viewpoints.
- 9.139 The assessment has shown that, during the operational phase, there would be (worst case) moderate/minor (not significant) level adverse effects on the local road network, but only in close proximity to the site, and specifically where routes are contiguous with, or in very close proximity to the site boundary, such as is shown at Photoviewpoints, 3, 4, and 7. The changes would result from a revision from open agricultural land to a landscape characterised by residential development.

Settlements and Private Residences

- 9.140 The Scheme plans indicate that the Proposed Development will respect the privacy and visual amenity of existing private residences along the eastern boundary of the site by the incorporation of a wide vegetative buffer, generous separation distances and a restriction on building heights, achieving a balance between development density and minimising impacts on neighbouring residential areas.

9.141 The assessment shows that, following completion, at Year 1 there would remain significant adverse, permanent effects on some residences that lie adjacent or in close proximity to the site. The effect upon the visual amenity of nearby residences varies between major (significant) and moderate (significant). Effects on more distant residences would remain generally not significant. Sensitivity ranges between high and very high, with magnitude of change ranging between high and very high also, with this being a worst-case level for the groups of receptors assessed. Such effects relate only to the extent of visual change and are inevitable for receptors with high sensitivity.

Mitigation during operational phase

9.142 Mitigation during the operational (post-completion) stage comprises embedded (avoidance) mitigation and additional mitigation proposed to reduce the significance of likely effects (reduction mitigation). These different mitigation measures are discussed below with reference to the Proposed Development.

Embedded Mitigation

- 9.143 The site currently comprises a series of agricultural fields enclosed by a network of hedgerows and hedgerow trees, tree belts and woodland, and is influenced by the existing settlement edge.
- 9.144 Despite the unavoidable loss of some open farmland, the current condition and key characteristics of the landscape have been considered throughout the design of the Proposed Development and integrated into the layout where possible. For example, a hierarchy of hedgerows retained with preference for those of greatest value and connectivity, and woodland blocks are retained and incorporated into the wider landscape Infrastructure for the site.
- 9.145 The careful design of the Proposed Development and its interface with areas to the north, south and east, particularly in relation to views from the settlement approach, also provides for a distinct and legible urban edge, which has been designed to best use the land within the site, especially in relation to areas of open space.
- 9.146 In terms of the arboricultural resource, the detailed masterplanning of the development layout has ensured that, where possible, trees and hedgerow loss would be minimised through integration of these features into the residential areas and the areas of open space. The Arboricultural Impact Assessment details the value of the tree stock on site and makes recommendations for future retention.

Additional Mitigation

- 9.147 The landscape and visual mitigation strategy is a key, and fully-integrated, component of the Proposed Development. The Proposed Development incorporates public open space (both formal and informal) and other landscape enhancements, which include:
- An over-arching landscape strategy for the site;
 - The provision of green spaces throughout the site, offering recreational value and a community resource; and
 - The creation of surface water attenuation and detention features, incorporated within the areas of open space.
- 9.148 As part of the wider Green Infrastructure, as illustrated within the Green Infrastructure parameters plan (appendix 4.3) public open spaces, both formal and informal, will be designed to provide high quality and traffic free green space, which satisfies a number of objectives, including:
- Public open space for formal and informal use;
 - Amenity and recreational space, including Local Equipped Areas of Play (LEAP) and Landscape Areas of Play (LAP);

- Community uses, such as the provision of orchards and allotments;
- Contribution to green networks and enhance habitat connectivity; and
- Facilitated SuDS and connectivity with the existing blue network.

9.149 In summary, the landscape elements specific to the detailed design of the proposals include enhancements that would provide:

- Visual screening, containment and filtering of the proposed development;
- Public and private amenity; and
- Ecological value.

Summary of Effects (Operational Phase)

9.150 Generally, the landscape and visual effects during the operational phases of the Proposed Development would be difficult to mitigate due to the nature of these operations. However, as described above, the adoption of approved best practice construction methods will aid in reducing the perception of construction activities for those receptors most likely to be affected.

9.151 Notwithstanding the adoption of these measures, and whilst the significance of the effect at some receptors would reduce to a limited degree, at no receptor that would experience a significant unmitigated effect would mitigation reduce the effect to a non-significant level.

9.152 The critical issue in considering operational effects is that the mitigation strategies are yet to be fully established. To summarise, residual significant effects would apply to the following receptors during the operational stage of the project:

Landscape character and fabric within the site;

- A number of the residences surrounding the site;
- A number of roads in close proximity to the site; and
- A number of the public rights of way and roads and publicly accessible locations within the immediate site surrounds.

TABLE 9.8 PREDICTED OPERATIONAL PHASE EFFECTS

RECEPTOR	PREDICTED SIGNIFICANCE OF EFFECT
Landscape Character Assessment	
Landscape Character and Fabric of the application site (Direct Effects)	Major/Moderate Adverse Temporary Local Significant
Host LCT	Moderate Adverse Temporary Regional Significant

Host Area	Moderate Adverse Temporary Regional Significant
Photoviewpoint EDP 1:	Moderate Adverse Temporary Local Significant
Photoviewpoint EDP 2:	Major/Moderate Adverse Temporary Local Significant
Photoviewpoint EDP 3:	Moderate Adverse Temporary Local Significant
Photoviewpoint EDP 4:	Moderate Adverse Temporary Local Not Significant
Photoviewpoint EDP 5:	Moderate Adverse Temporary Local Not Significant
Photoviewpoint EDP 6:	Moderate/Minor Adverse Temporary Local Not Significant Moderate Adverse Temporary Local Significant

Photoviewpoint EDP 7:	Moderate Adverse Temporary Local Significant
Photoviewpoint EDP 8:	Negligible Adverse Temporary Local Not Significant
Photoviewpoint EDP 9:	No Effect
Photoviewpoint 10:	Moderate Adverse Temporary Local Significant Minor Adverse Temporary Local Not Significant
Photoviewpoint EDP 11:	No Effect
Photoviewpoint EDP 12:	Moderate/Minor Adverse Temporary Local Significant

RESIDUAL EFFECTS

- 9.153 The following is an assessment of the residual effects of the Proposed Development following mitigation employed during the construction phase (to reduce the effects of construction activities) and after completion, at Year 15, once embedded mitigation measures have matured and building materials have weathered.
- 9.154 The Proposed Development has been designed to consider the sensitivity of the landscape and views within and around the application site. With the exception of further evolution of the open space strategy, no further landscape mitigation is proposed subsequent to the delivery of the

Proposed Development. The 'residual' effects of the scheme are considered to be those that persist once the effects of mitigation – be that strategic planting or the softening of the Proposed Development provided by internal planting and areas of open space – have become established. In planning terms, these are the effects to which most 'weight' should be attached, since they represent the long-term effect on the landscape and visual baseline.

- 9.155 The residual effects following the implementation of the mitigation strategies are detailed in Appendix 9.2 and 9.3 and summarised in Table 9.10. Only those residual effects that have reduced and/or ameliorated likely significant effects as described above are discussed.

After Completion

On-Site Landscape Character Identified by EDP

- 9.156 Following completion, and as mitigation measures mature, by Year 15, the magnitude of change would reduce slightly. However, given the degree and permanence of change (from open fields to a residential area), the level of effect would remain major/moderate, adverse and significant, resulting from a medium sensitivity and a high magnitude of change. However, with time, the development would be perceived as part of the wider suburban margins of the settlement (to which its use would be consistent), which would result in a further lowering of the level of effect. Over the long term, references to the magnitude of change and levels of effect would become irrelevant, as the development will become perceived as an integral part of the town, rather than a 'new' development.
- 9.157 An understanding of the mitigation measures embedded in the scheme is fundamental to an assessment of the potential landscape and visual effects. The design in terms of layout, built-form height, orientation, and biodiversity enhancements has been informed by the LVIA process and is presented in the scheme plans, as well in the maximum heights presented at Appendix 4.2 of this ES. A key principle of landscape assessment is that the assessment should take account of the effect of any proposed mitigation (GLVIA3, paragraph 6.45) in mitigating potential significant effects. The heights presented in Appendix 4.2 have been determined to minimise the potential for significant adverse effects on landscape character and visual amenity.

Landscape Character Areas

- 9.158 Invariably, a mixed-use development on a 'greenfield' site, and at the scale proposed, will result in the unavoidable loss of open farmland and necessary removal of some characteristic landscape features, in particular some hedgerows in order to create access into the site, or to allow for development of built form and infrastructure, at a level that has the potential to materially alter the character of the receiving environment. However, in the case of this site, few existing landscape features will be affected by the Proposed Development; indeed, there would be a net gain in the number of trees and the quality of hedgerows through the site, and the addition of a large area of open space managed for biodiversity. An assessment of the impact of the development on the sites hedgerows (and linear tree groups) has been undertaken, the findings of which as presented within the ecology appraisal which accompanies the application.
- 9.159 The overall effects on the host landscape character would reduce to moderate/minor adverse (not significant), resulting from a medium sensitivity and a low magnitude of change, and would decrease rapidly with distance from the application site boundary, and where intervening development, vegetation and landform provide screening. Whilst there would remain effects in the long term, it is important to consider that the masterplanning and layout of the development, in accordance with the landscape strategy, would ensure that it would become, and appear, a natural and logical extension to the town. This is as opposed to representing a 'new' development within an undeveloped context. The development would appear rational in a landscape sense, and with good design and appropriate mitigation and management, it would represent a sensitive addition to this part of the town, where the spread of effects, geographically, would be limited.

Rights of Way Users

- 9.160 As shown on Figure EDP 9.5 (Appendix 9.41), there are a number of public rights of way in the rural landscape to the surrounding the site which are afforded views of the site,
- 9.161 There would be a worst case major/moderate adverse effect at a significant level. In general terms, and in the case of all effects upon all routes, it is true that over the longer term, and as the development becomes an accepted part of the view, references to the magnitude of change and levels of effect would be immaterial as the development becomes part of the local context.

Road Users (New Road, Sandridge Road/Sandridge Common (A3102) & Rural Lanes)

- 9.162 During the construction phases and early life of the Proposed Development, there would be significant effects on the road network within close proximity to the application site, as detailed previously. Generally, by Year 15, the magnitude of change would reduce for road all receptors, and this is discussed with reference to the main road receptors in the study area in Appendix 9.2.
- 9.163 Over the longer term, and as the development becomes an accepted part of the view from these roads, references to the magnitude of change and levels of effect would become irrelevant in the local context.
- 9.164 For the remaining road network, where screening, the existing character of views and the low sensitivity generally of road receptors plays an important role in limiting effects, there would be no residual significant effects.

Settlements and Private Residences

- 9.165 Following completion, and as mitigation measures mature, by Year 15 the magnitude of change would generally reduce for the majority of residential receptors, reflecting the success of the scheme mitigation, and the early establishment of strategic planting belts through and along the boundaries of the application site.
- 9.166 For those instances where the level of effect would reduce, it would still remain significant, with varying degrees of sensitivity and magnitude of change).
- 9.167 Although a (worst case) significant residual effect is predicted for all of the residential areas adjacent to the site, subject to the establishment and maturation of landscape proposals and the general acceptance of new development areas over longer timeframes, none of these effects are considered such that the Proposed Development will have an overbearing influence on the amenity of the properties.
- 9.168 Furthermore, it is not all residences that would experience such an effect, but only those where an open view is available, and where existing and proposed vegetation does not form a screen between properties and the Proposed Development. Such instances are very limited, meaning the overall community effect (i.e. considering all of the residences together) would not be at a significant level.
- 9.169 Finally, the assessment of a significant effect results primarily from the assignment of a very high sensitivity of such receptors, rather than a large degree of predicted change. In a visual amenity sense, this would (if it occurred) be subject to greater material consideration, due to the increased likelihood for an overbearing effect.

TABLE 9.9 PREDICTED RESIDUAL PHASE EFFECTS

LANDSCAPE CHARACTER ASSESSMENT	
Landscape Character and Fabric of the application site (Direct Effects)	Moderate Adverse Permanent Local Significant
Host LCT	Minor Adverse Permanent Regional Not Significant
Host Area	Minor Adverse Permanent Regional Not Significant
Photoviewpoint EDP 1:	Minor Adverse Permanent Local Not significant
Photoviewpoint EDP 2:	Moderate Adverse Permanent Local Significant
Photoviewpoint EDP 3:	Minor Adverse Permanent Local Not Significant
Photoviewpoint EDP 4:	Minor/Negligible Adverse Permanent Local Not Significant
Photoviewpoint EDP 5:	Minor Permanent Local Not Significant

Photoviewpoint EDP 6:	Minor/Negligible Permanent Local Not Significant Moderate/Minor Permanent Local Not Significant
Photoviewpoint EDP 7:	Minor Permanent Local Not significant
Photoviewpoint EDP 8:	Negligible Adverse Permanent Local Not Significant
Photoviewpoint EDP 9:	No Effect
Photoviewpoint EDP 10:	Minor Adverse Permanent Local Not Significant Negligible Adverse Permanent Local Not Significant
Photoviewpoint EDP 11:	No Effect
Photoviewpoint EDP 12:	Minor Adverse Permanent Local Not significant

In Combination and Cumulative Effects

- 9.170 Cumulative effects can arise from the intervisibility of operational or consented development and/or from the combined effects of individual components of the Proposed Development occurring in different locations or over a period of time. The separate effect of such individual components or developments may not be significant, but in-combination they may create a degree of adverse effect on the landscape resource or visual receptors within their combined visual envelopes, such that cumulative effects may be significant.
- 9.171 In this cumulative assessment, the focus is on the additional effects of the site. Existing and/or approved developments may have significant effects in their own right, but significant cumulative effects do not automatically arise on a single receptor following the addition of the Proposed Development; the significance is determined by the degree of change that the Proposed Development would introduce into the theoretical cumulative baseline.
- 9.172 Cumulative effects arise in two principal ways – in combination and sequentially. Combined effects occur when: 1) two or more schemes appear simultaneously in the same arc of view without the need for an observer to turn; and 2) in succession, where it is necessary for the observer to turn the head to see the multiple schemes. Sequential effects occur where the observer has to move from one location to another to be able to see the different developments, and typically arise when the observer is travelling through a landscape, for example on a road or footpath.
- 9.173 Cumulative schemes have been considered for the assessment of effects potentially relevant to the Proposed Development. The cumulative schemes are provided below:
- Land south of Western Way, Bowerhill, Melksham (Ref: W16.1123);
 - Land south of Western Way, Melksham (Ref: W18.4477);
 - Land South of Western Way, Melksham (PL/2022/08504);
 - Land east of Spa Road, Melksham (Ref: 18/04644/REM);
 - Bowden Guest House, 25-27 Beanacre Road, Melksham (Ref: W17.10015);
 - Land east of Semington Road, Melksham (Ref: W17.1251);
 - 3 Lowbourne, Melksham (Ref: W13.7076);
 - Land East of Semington Road, Melksham (Ref: 20/01938/OUT);
 - Park Farm, Seend Cleeve, Melksham (Ref: 20/02213/FUL);
 - Land at Blackmore Farm (Ref: PL/2023/01949)
 - Land to the West of Semington Road, Melksham (PL/2022/08155);
 - Land at Verbena Court, Melksham (PL/2023/06976); and
 - Land at Longleaze Lane, Melksham (PL/2023/06725).
- 9.174 Due to their relative distance to the site, their location on the western or southern side of Melksham and some schemes have being built out and considered as part of the baseline – the following schemes have been discounted from this assessment:
- Land south of Western Way, Bowerhill, Melksham (Ref: W16.1123);
 - Land south of Western Way, Melksham (Ref: W18.4477);
 - Land South of Western Way, Melksham (PL/2022/08504);
 - Land east of Spa Road, Melksham (Ref: 18/04644/REM);
 - Bowden Guest House, 25-27 Beanacre Road, Melksham (Ref: W17.10015);

- Land east of Semington Road, Melksham (Ref: W17.1251);
- 3 Lowbourne, Melksham (Ref: W13.7076);
- Land East of Semington Road, Melksham (Ref: 20/01938/OUT);
- Park Farm, Seened Cleeve, Melksham (Ref: 20/02213/FUL);
- Land to the West of Semington Road, Melksham (PL/2022/08155);
- Land at Verbena Court, Melksham (PL/2023/06976); and
- Land at Longleaze Lane, Melksham (PL/2023/06725).

9.175 Based upon the distribution of landscape and visual receptors for the site, and the likely extent of landscape and visual effects presented within this chapter, it is only in combination with the following scheme that any cumulative landscape and visual effects are likely to occur:

- Land at Blackmore Farm (Ref: PL/2023/01949).

9.176 Views of the Proposed Scheme, including the Cumulative sites may be possible from within the wider landscape context, albeit limited to few areas of higher ground, but it is not the view that defines the landscape effect; rather it is changes to the physical and wider perceptual qualities (including visual) that lead to the level of effect. The proposed development would be barely discernible due to weathering and the proposed landscape mitigation maturing. Therefore, the residual cumulative magnitude of change is judged to be at worst case very low, giving rise to a moderate/minor level of effect which is not significant.

TABLE 9.10 RESIDUAL CUMULATIVE EFFECTS

RECEPTOR	PREDICTED SIGNIFICANCE OF EFFECT
Photoviewpoint EDP 1:	Not Significant
Photoviewpoint EDP 2:	Not Significant
Photoviewpoint EDP 3:	Not Significant
Photoviewpoint EDP 4:	Not Significant

Photoviewpoint EDP 5:	Not Significant
Photoviewpoint EDP 6:	Not Significant
Photoviewpoint EDP 7:	Not Significant
Photoviewpoint EDP 8:	Not Significant
Photoviewpoint EDP 9:	Not Significant
Photoviewpoint 10:	Not Significant
Photoviewpoint 11:	Not Significant
Photoviewpoint 12:	Not Significant
Cumulative Photoviewpoint EDP 1	Not Significant
Cumulative Photoviewpoint EDP 2	Not Significant

Cumulative Photoviewpoint EDP 3	Not Significant
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LIMITATIONS AND ASSUMPTIONS

- 9.177 Baseline conditions have been established using existing assessments, available documentation and field assessment; it is important to note that this information may change before or during the construction and operation of the Proposed Development.
- 9.178 Within reasonable limits, the assessment is undertaken in consideration of the 'worst case' scenario for the development, i.e. those potential outcomes, situations or locations that would result in the most profound effect on landscape and visual receptors. It therefore identifies the greatest degree of change likely to accrue and may be subject to mitigating factors or alternative conditions that might reduce those effects. For example, visual effects are considered in both summer and winter contexts, although the level of effect is expressed for winter landscape conditions when trees are bare of leaf cover and the visibility of development is at its greatest. Where this is the case, the assessment identifies alternative conditions or further mitigation that might result in impacts being less pronounced.
- 9.179 The assessment of potentially significant effects applies a pre-determined methodology to arrive at its conclusions (Appendix 9.1 Appendix EDP 1). This procedure brings a degree of objective, procedural rigour into what otherwise might be judged to be 'personal opinion'. Certainly, professional judgement still plays its part, but the purpose of adopting a methodology is to make the process as clear and logical as possible.

CONCLUSIONS

Effects on the Landscape Resource (Site Landscape Character and Context, LCA 12B: Avon Open Clay Vale & Area 3: Open Clay Vale)

- 9.180 The Proposed Development will have direct effects on existing landscape resources including hedgerows. Given the change in land use from agriculture/grazing to residential, the Proposed Development will have unavoidable significant effects on the landscape character of the site, but will not significantly alter the character of the wider surrounding landscape, due to the discrete geographical area over which effects will be experienced.
- 9.181 More important than the presence of what amounts to unavoidable significant landscape character effects is the retention of existing hedgerows, trees along the site, and the provision of new public open space and planting, which will help considerably in integrating the Proposed Development into the urban-rural context.
- 9.182 The relatively well-contained nature of the residual effects are driven, largely through the strategic planting incorporated at points around the perimeter and throughout the site, to ensure that effects are predominantly limited to within localised areas comprising the application site and its immediate context. Whilst there would be significant adverse effects on the application site and its immediate context, the effects reduce quickly with distance so that the overall effects on landscape character types are not significant. Over time, these effects will further reduce such that the development would become an accepted part of the edge of Melksham.

Effects on Designated Landscapes

- 9.183 As illustrated within the assessment, there is no effect on any designated landscape.

Effects on Rights of Way Users

- 9.184 Based on the assessed viewpoints, the overall visibility of the development is relatively well-contained in many directions, due to the planting incorporated surrounding, and through the site, in addition to the contribution that woodland and urban form make to general intervisibility within the study area. The urban area of Melksham to the east limits the distribution of effects dramatically to a narrow zone at the urban edge.
- 9.185 The visual effects predicted to arise as a result of the introduction of the Proposed Development follow a similar pattern to effects upon landscape character, in that significant effects are likely to occur only within and in very close proximity to the Proposed Development; the magnitude of change to views decreases rapidly with distance from the application site, partly due to screening, and partly due to the masterplan layout, which is designed to respect close range and more distant views. Therefore, the receptors most likely to experience a significant effect at Year 15 following completion would be PRow in close proximity to the site.

Effects on Road Users (New Road, Sandridge Road/Sandridge Common (A3102) & Rural Lanes)

- 9.186 As detailed within the assessment, there is no residual significant residual significant effects on any Road users.

Effects on Settlement and Privates Residences

- 9.187 The Proposed Development will be visible from the edges of the existing settlement, but there is likely to be limited, or no, visibility from within the wider urban area of the settlement and from other nearby settlements. Furthermore, the scheme plans indicate that building heights have been designed to be sensitive to the most proximate, and sensitive, visual receptors.
- 9.188 Although a (worst case) significant residual effect is predicted for all of the residential areas adjacent to the site, subject to the establishment and maturation of landscape proposals and the general acceptance of new development areas over longer timeframes, none of these effects are considered such that the Proposed Development will have an overbearing influence on the amenity of the properties.
- 9.189 Furthermore, it is not all residences that would experience such an effect, but only those where an open view is available, and where existing and proposed vegetation does not form a screen between properties and the Proposed Development. Such instances are very limited, meaning the overall community effect (i.e. considering all of the residences together) would not be at a significant level

Summary

- 9.190 This assessment concludes that, from a landscape and visual perspective, the application site which is proposed for residential development under the emerging local plan is suitable for the Proposed Development, at the scale and form indicated on the submission plans. The Proposed Development with 'embedded' mitigation measures will have a limited effect on views from the surrounding areas, as it would be well-integrated, through a combination of tree belts and other screening features, and where visible, perceived in the context of the existing suburban areas of Melksham. Over the longer term, it would represent a well-designed and sensitive extension to the wider settlement.
- 9.191 The landscape and visual receptors the have been identified in this chapter, the potential effects of the Proposed Development on these receptors, mitigation and resulting residual impacts are summarised in Tables 9.7 to 9.10 above.

TABLE 9.11 SUMMARY SIGNIFICANCE TABLE

EFFECT	RECEPTOR	SENSITIVITY	MAGNITUDE OF CHANGE	SIGNIFICANCE OF EFFECT	MITIGATION	RESIDUAL EFFECT
Major/Moderate	Site Landscape Character and Context	Medium	High	Significant	The maturation of the landscape mitigation and enhancements, particularly along the site boundaries, would help to visually contain the site and create a new, positive settlement edge. This would reduce the magnitude of change to some extent	Moderate
Moderate/Minor	Host LCT	Medium	Low	Not Significant	The maturation of the landscape mitigation across the site would limit the perceptual effects experienced by the wider local landscape context.	Minor
Moderate/Minor	Host Area	Medium	Low	Not Significant	In the long-term, the maturation of the landscape mitigation across the site area, in combination with the existing established vegetation, would soften the perceptual effects	Minor
Moderate	Photoviewpoint EDP 1:	High	Medium	Not Significant	Newly planted landscape features within the proposed development would have matured enough to provide some visual mitigation and serve to break up the massing of the built form, such that the character of the view is likely to be similar to the baseline context, albeit with additional	Minor

EFFECT	RECEPTOR	SENSITIVITY	MAGNITUDE OF CHANGE	SIGNIFICANCE OF EFFECT	MITIGATION	RESIDUAL EFFECT
					residential development within the view.	
Major/Moderate	Photoviewpoint EDP 2:	High	Medium	Significant	The continued maturation of the landscape proposals throughout the site, in particular along the green corridor that runs along the northern boundary, would help to assimilate the proposed development into the surrounding context.	Moderate
Moderate/Minor	Photoviewpoint EDP 3:	Medium	Low	Not Significant	The landscape mitigation embedded within the masterplan would have continued to mature, particularly along the north-eastern boundary. This serves to mitigate views of built form from this location. Therefore, the proposed development would become a minor constituent within the view at worst.	Minor
Minor	Photoviewpoint EDP 4:	Low	Low	Not Significant	The landscape scheme (particularly along the eastern boundary) would have matured providing visual mitigation. As a result the proposed development would form a minor constituent within the view, and where visible is representative of the surrounding context.	Minor/Negligible
Moderate/Minor	Photoviewpoint EDP 5:	High	Very Low	Not Significant	The vast majority of the proposed development would be screened from this location	Minor

EFFECT	RECEPTOR	SENSITIVITY	MAGNITUDE OF CHANGE	SIGNIFICANCE OF EFFECT	MITIGATION	RESIDUAL EFFECT
					due to intervening built form and landscape features resulting in the proposed development being barely discernible within the view .	
Moderate	Photoviewpoint EDP 6:	Medium	Low	Not Significant	The landscape proposals would have matured assisting in assimilating the proposal into the surrounding context. Where views are possible these would be limited to partial/glimpsed and would not be uncharacteristic of the baseline landscape.	Minor
Moderate/Minor	Photoviewpoint EDP 7:	Low	Medium	Not Significant	The proposed development would remain recognisable, however, now softened by the landscape mitigation reducing the magnitude of change.	Minor
Minor/Negligible	Photoviewpoint EDP 8:	Low	Very Low	Not Significant	The vast majority of the proposed development would be screened from this location by the existing residential development.	Negligible
No Effect	Photoviewpoint EDP 9:	High	No Change	Not Significant	No Effect	No effect
Low	Photoviewpoint EDP10:	High	Very Low	Not Significant	The landscape proposals would have matured serving to break up the appearance of built form and assisting in assimilating the proposal into the surrounding context. Where views are possible, these would be partial,	Minor

EFFECT	RECEPTOR	SENSITIVITY	MAGNITUDE OF CHANGE	SIGNIFICANCE OF EFFECT	MITIGATION	RESIDUAL EFFECT
					at a sufficient distance and in line with the surrounding baseline context.	
No Effect	Photoviewpoint EDP 11:	High	No Change	Not Significant	No Effect	No effect
Moderate/Minor	Photoviewpoint EDP 12:	High	Very Low	Not Significant	The landscape mitigation would have matured forming a new positive settlement edge to Melksham, improving upon the stark linear nature of the existing settlement edge.	Minor
Major/Moderate	Group of dwellings on the settlement edge to the west of the site	High	Medium	Significant	The landscape mitigation would have matured helping to assimilate the proposal into the local context.	Moderate
Major/Moderate	Group of dwellings within Melksham to the south of the site	High	Medium	Significant	The development is set back from the southern boundary with vertical landscape elements helping to assimilate the development into the local context.	Moderate
Major	Isolated dwellings on the boundary of the site	High	Low	Not Significant	Development is set back from the eastern boundary with a large landscape buffer in place helping to assimilate the development into the local context and reduce visual impacts.	Moderate/Minor
Moderate	Residential dwellings along the	High	Very Low	Not Significant	The integrated landscaping within the masterplan would	Moderate/Minor

EFFECT	RECEPTOR	SENSITIVITY	MAGNITUDE OF CHANGE	SIGNIFICANCE OF EFFECT	MITIGATION	RESIDUAL EFFECT
	A3102 to the south-east of the site				have matured mitigating views of the built form.	

10 Cumulative and interactive effects

- 10.1 The EIA Regulations require an ES to describe the likely effects of development on the environment when taken cumulatively with other environmental effects and any current or prospective development in the vicinity.
- 10.2 Whilst there is no formal definition with legislation or the National Planning Policy Guidance of what constitutes a 'cumulative effect' and no prescribed methodology on how to assess such interactions between environmental receptors or other development sites, for this purpose the following has been considered to represent a cumulative impact:

“Impacts that result from incremental changes caused by other past, present or reasonably foreseeable actions together with the project.”

- 10.3 In this regards, there are two types of cumulative effect, which are commonly known as 'Type 1' and 'Type 2' effects, respectively. These are generally defined as follows:

Type 1 Cumulative Effects: The combined effects of individual effects resultant from the development upon a set of defined sensitive receptors, for example noise, dust and visual effects; and

Type 2 Cumulative Effects: The combined effects arising from another development site or sites, which individually might not be significant, but when considered together could create a significant cumulative effect.

- 10.4 Type 2 effects have been considered within each topic chapter (chapters 6 – 9) referencing the in-combination effects of the following development locations:

- Land south of Western Way, Bowerhill, Melksham (Ref: W16.1123);
- Land south of Western Way, Melksham (Ref: W18.4477);
- Land South of Western Way, Melksham (PL/2022/08504);
- Land east of Spa Road, Melksham (Ref: 18/04644/REM);
- Bowden Guest House, 25-27 Beanacre Road, Melksham (Ref: W17.10015);
- Land east of Semington Road, Melksham (Ref: W17.1251);
- 3 Lowbourne, Melksham (Ref: W13.7076);
- Land East of Semington Road, Melksham (Ref: 20/01938/OUT);
- Park Farm, Seend Cleeve, Melksham (Ref: 20/02213/FUL);
- Land at Blackmore Farm (Ref: PL/2023/01949);
- Land to the West of Semington Road, Melksham, Wilts (Ref: PL/2022/08155);
- Land at Verbena Court, Melksham, SN12 7GG (71 bed C2 care) (Ref: PL/2023/06976); and
- Land at Longleaze Lane, Melksham, SN12 6QJ (86 bed C2 care) (Ref: PL/2023/06725).

- 10.5 Table 10.1 considers the combined residual effects on individual environmental receptors – Type 1 effects – and illustrates that none of the combined effects on individual receptors are materially different. This does not highlight a receptor that will be subject to a significant adverse environmental effect as a consequence of combined effects from the proposed development. The table illustrates that whilst individual receptors in some instances are subject to more than one environmental effect, when the cumulative effects are taken together, the accumulation is not considered to give rise to a greater, or more adverse, effect.

10.1 COMBINED RESIDUAL EFFECTS ON INDIVIDUAL SENSITIVE RECEPTORS

ENVIRONMENTAL RECEPTOR	NATURE OF EFFECT	COMMENTS
Human Beings	As visual receptors, residents close to the site and users of routes (including the PROW) will experience a change in views as the character of the site is altered.	These are combined temporary effects which will be experienced during the construction phase.
	Short term effects as houses are occupied during the construction phases potentially ahead of some elements community infrastructure provision	These combined effects will not extend into the operational phase, other than the change in the character of the site which is a permanent effect that will occur over the life of the project outweighed by the benefits that it will bring in the delivery of new homes.
	There may be an increase in traffic that could affect road users.	In terms of any increases in traffic and delays, these will be negligible.
Receptors that are landscape features and ecological features.	Loss of or change to landscape features around and within the site's boundaries will contribute to the change in views and landscape character.	Whilst the loss of some vegetation is necessary to form access to the development and to allow internal roads to be constructed these are limited in nature because of the open character and large field pattern of the site.
	The proposed development will change the character of the landscape as resource from countryside to built form with associated visual and landscape impacts.	It is noted that it is expected through detailed design that a large number of new trees will be planted within the POS and this is considered a major benefit. With a robust Habitat Management Plan in place it is considered the proposals will be positive. The scheme will deliver a biodiversity net gain and the provision of green infrastructure will be positive. Both of which are assessed to be benefits of the scheme. The Proposed Development will have direct effects on existing landscape resources including hedgerows. Given the change in land use from agriculture/grazing to residential, the Proposed Development will have unavoidable significant effects on the landscape character of the site but will not significantly alter the character of the wider surrounding landscape, due to the discrete geographical area over which effects will be experienced. More important than the presence of what amounts to unavoidable significant landscape character effects is the retention of existing hedgerows, trees along the site, and the provision of new public open space and planting, which will

		help considerably in integrating the Proposed Development into the urban-rural context. The relatively well-contained nature of the residual effects are driven, largely through the strategic planting incorporated at points around the perimeter and throughout the site, to ensure that effects are predominantly limited to within localised areas comprising the application site and its immediate context. Whilst there would be significant adverse effects on the application site and its immediate context, the effects reduce quickly with distance so that the overall effects on landscape character types are not significant. Overtime, these effects will further reduce such that the development would become an accepted part of the edge of Melksham.
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11 Summary

11.1 This chapter sets out a summary of the main findings.

SOCIO ECONOMIC

11.2 The ES considered in detail the likely significant effects of the Proposed Development on socio-economic receptors.

11.3 There are no formal measures of assessing impact significance for socio-economic receptors. There is no standard guidance that specifies the technical approach to the assessment of socio-economic effect. In the absence of standard industry guidance, Glasson et al (2018) serves as a useful resource to assist in setting appropriate parameters for the assessment of socio-economic effects. The assessment of socio-economic effects therefore considers the effects of the construction phase on employment receptors, and the effects of the operational phase on social and economic receptors covering population, housing, education services, healthcare services, community services and open space.

11.4 Melksham has a population of approximately 24,000 residents, making it the fifth largest town in Wiltshire based on population. Its economy is characterised by a mix of traditional and modern industries, with manufacturing, retail, and service sectors particularly important in terms of employment. Melksham also serves as a commuter town for nearby cities such as Bath and Bristol.

11.5 Core Policy 2 (Delivery strategy) of the Wiltshire Core Strategy sets out an indicative housing requirement of 2,240 for Melksham Town and 130 in Melksham Remainder, which will aim to be delivered over the plan period (2006–2026).

11.6 The Wiltshire Council Housing Land Supply Statement (2024) indicates there is a shortfall of 707 residential units compared to the identified requirement over the plan period across Wiltshire as a whole, with a 706-unit shortfall in the Chippenham HMA.

11.7 The Proposed Development is located within the primary school catchment area for River Mead School and The Manor Church of England School. In addition, Aloeric Primary School, Forest and Sandridge Church of England Primary School, and the new school planned at Pathfinder Way are within the 2 miles safe walking distance from the application site. The Proposed Development is located within the secondary school catchment area for Melksham Oak Community School Secondary, which is just over 3 km to the south of the site.

11.8 There are two GP practices which fall within the local socio-economics study area and in the wider Chippenham HMA: Giffords Primary Care Centre (Spa Road); and Spa Medical Centre (Snowberry Lane). There are also a number of dental practices, pharmacies, and opticians.

11.9 As a market town, Melksham is an important service centre for its own residents and those of its hinterland. Melksham's community services include: childcare; leisure and recreation; arts and entertainment; religious; retail; public services; hospitality; and transport.

11.10 Melksham has a good level of access to park and recreation ground space, and has almost the quantity standard of amenity green space provision. Access to allotments and play space is limited.

11.11 Beneficial effects which are significant in EIA terms are assessed in terms of new housing delivery and early years education provision.

11.12 Beneficial effects which are not significant in EIA terms are also assessed in terms of construction sector employment, and open space provision.

- 11.13 Adverse effects which are not significant in EIA terms are assessed with regards to primary education and healthcare services. Following consideration of additional mitigation measures, the residual effect on primary education and healthcare services is assessed to be of negligible significance.
- 11.14 Following consideration of additional mitigation measures, the Proposed Development is likely to have beneficial impacts in terms of the scope of the socio-economic assessment.
- 11.15 Following consideration of relevant cumulative projects, no adverse cumulative effects have been assessed with regards to socio-economic receptors.

TRANSPORT, ACCESSIBILITY, AND MOVEMENT

- 11.16 The ES has considered the likely effects of the proposed development on transport, accessibility and movement. The site has been designed to accommodate the anticipated traffic movements associated with the construction and operational phases of the Proposed Development.
- 11.17 The proposed development will provide two vehicular access points. The primary access point is located along Sandridge Common to the south of the site and comprises a fourth arm being constructed at the Sandridge Common Eastern Way roundabout to provide access to the site. The secondary access point comprises an emergency access onto Sandridge Common, to the west of the primary access roundabout.
- 11.18 During the construction phase of the Proposed Development, the effects of construction traffic are anticipated to be negative, and according to IEMA thresholds typically negligible in their level of impact. In addition to this negligible impact, it is recognised that any impact is temporary and management control measures will be implemented in the form of a Construction Traffic Management Plan imposed by planning condition, health and safety legislation requirements and good site construction practices to ensure no adverse significant effects occur.
- 11.19 The proposed development during its operational phase would give rise to an increase in travel demand by all main modes of transport. To accommodate this additional demand mitigation measures have been identified and proposed. These include:
- Internal walking and cycling links that connect into existing infrastructure;
 - LTN 1/20 compliant footways/cycleways and crossings at the primary roundabout access to connect into existing 3m wide shared footway/cycleways to the south of the site along Eastern Way;
 - Provision of 3m wide leisure route to connect onto New Road;
 - Provision of two high quality bus stops along Sandridge Common to align with what was proposed a part of the live outline planning application on the site;
 - Provision of two signalised pedestrian crossing points along Sandridge Common adjacent to the emergency access and adjacent to the roundabout to allow for safe pedestrian movements to the bus stops consented as part of the Blackmore Farm application; and
 - In line with comments received from Wiltshire Council rather than a contribution towards junction improvements at Church Lane/Blackmore Farm mini roundabout, a contribution towards walking, cycling and public transport would be sought. Specifically, travel incentives will be offered including the offering a green travel voucher (£300 per dwelling), a Travel Plan Co-ordinator would be employed on the site, Resident Travel Information Packs would be prepared amongst other measures that the Travel Plan Co-ordinator would be in charge of promoting.
- 11.20 Following implementation of the above mitigation, no significant adverse effects are anticipated.

ECOLOGY AND NATURE CONSERVATION

- 11.21 The ES has assessed the likely significant effects of the Proposed Development on the environment in respect of biodiversity and ecology.
- 11.22 The biodiversity assessment was informed by desk study (including a request for records from the local environmental records centre) and field survey, including habitat survey, and species-specific field surveys for badgers, bat (roosting and activity), breeding birds, water vole, otter and dormouse.
- 11.23 The application site lies approximately 9.0km from the nearest SSSI component of the Bath and Bradford-on-Avon Bats SAC however it does not lie within a Consultation Zone of the SAC. No impacts are predicted on this protected site. Numerous non-statutory designated sites lie within 2km of the site, however no impacts are predicted.
- 11.24 The habitat survey found that the site has little value in terms of habitats, however, the on-site hedgerows and the watercourse running through the centre of the site are noted to be of high importance for biodiversity conservation and require protection and restoration. It is noted that a veteran tree lies offsite, adjacent to the pipeline in the north of the site. The species-specific surveys found that the application site supports a variety of bat species were recorded using the application site for foraging purposes, including more rare Annex II species. The application site supports an assemblage of common and widespread birds that includes a range of notable species and dormouse have been identified in small numbers using the application site's boundary features.
- 11.25 The Proposed Development has been designed to ensure appropriate buffers are in place to ensure habitats of higher importance can be protected as a result of development activities. The site has been designed to locate the majority of the Proposed Development on areas that have lowest value for biodiversity (i.e. modified grassland).
- 11.26 Nevertheless, in the absence of mitigation there will be a likely significant effect on some ecological receptors. Development on site could affect the continuity of bat habitat corridors, through habitat loss from construction and from barriers created by lighting during operation. Possible pollution incidents during construction and increase in recreational activity during operation could affect the watercourse and adjacent habitats. Habitat loss during construction and inappropriate management/disturbance during operation could affect bats, badger, breeding birds, dormouse, hedgehogs and invertebrates. However, with a comprehensive suite of avoidance, mitigation and compensation measures there will be no likely significant residual adverse effects.
- 11.27 The mitigation proposals for impacts to important ecological features during construction include sensitive timing and phasing of works, avoidance of impacts on important habitats and implementing protective measures to those being retained, buffers, ecological clerk of works and licensing (where relevant) during sensitive tasks. It is recommended that these are secured and actioned by preparing a Construction Environmental Management Plan that guides construction activities.
- 11.28 Mitigation proposals for impacts from the operational development have been developed with the objective of demonstrating 'exemplar mitigation' (as required by both Wiltshire Council and Natural England, the Government's advisor on nature conservation in England LPA). These are to be set out within a Mitigation and Monitoring Plan and include (but are not limited to) creation of new habitat and enhancements to existing retained habitats through sensitive management. Species specific measures include installation of new bat, bird and dormouse boxes and creation of log/brush piles for reptile and amphibians.
- 11.29 It is considered that the proposal can also deliver a Biodiversity Net Gain (a required by the Environment Act 2021) on the application site, through habitat retention, enhancement and creation.

- 11.30 It is anticipated that the Proposed Development will result in no significant adverse effects to nature conservation alone or cumulatively, assuming the mitigation proposed above is implemented. The proposed enhancement measures will have a beneficial effect on nature conservation in relation to Habitats of Principal Importance, other habitats protected and notable species of fauna.

LANDSCAPE & VISUAL

- 11.31 The Proposed Development will have direct effects on existing landscape resource. Given the change in land use from pasture to residential, the Proposed Development will have unavoidable significant effects on the landscape character of the site but will not significantly alter the character of the wider surrounding landscape, due to the discrete geographical area over which effects will be experienced.
- 11.32 More important than the presence of what amounts to unavoidable significant landscape character effects is the retention of existing hedgerows and trees along the site boundaries and throughout the application site, and the provision of new public open space and planting (particularly along the eastern boundary), which will help considerably in integrating the Proposed Development into the urban-rural context.
- 11.33 The well-contained nature of the residual effects are driven, largely through the strategic planting incorporated at points around the perimeter and throughout the site, to ensure that effects are predominantly limited to within localised areas comprising the application site and its immediate context. Whilst there would be significant adverse effects on the application site and its immediate context, the effects reduce quickly with distance so that the overall effects on landscape character types are not significant. Over time, these effects will further reduce such that the development would become an accepted part of the edge of Melksham.
- 11.34 Based on the assessed viewpoints, the overall visibility of the development is relatively well-contained in many directions, due to the strategic planting incorporated surrounding, and through the application site, in addition to the contribution that urban form makes to general intervisibility within the study area. The urban area of Melksham to the east limits the distribution of effects dramatically to a narrow zone at the urban edge.
- 11.35 The visual effects predicted to arise as a result of the introduction of the Proposed Development follow a similar pattern to effects upon landscape character, in that significant effects are likely to occur only within and in close proximity to the Proposed Development; the magnitude of change to views decreases rapidly with distance from the application site, partly due to screening, and partly due to the scheme layout, which is designed to respect close range and more distant views. Therefore, the receptors most likely to experience a potential significant effect at Year 15 following completion would be a single PRoW and residential receptors within in close proximity to the application site.
- 11.36 From a landscape and visual perspective, the application site is suitable for the Proposed Development, at the scale and form indicated on the scheme plans. The Proposed Development with 'embedded' mitigation measures will have a limited effect on views from the surrounding areas, as it would be well-integrated, through a combination of tree belts and other screening features, and where visible, perceived in the context of the existing urban areas of Melksham. Over the longer term, it would represent a well-designed and sensitive extension to the wider settlement.

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