

2. Approach to EIA

Introduction

- 2.1 This Chapter sets out the approach and methodology that has been undertaken to complete the assessment of the likely significant environmental effects of the Proposed Development (as described in **Chapter 4: The Proposed Development** and supporting plans).
- 2.2 This Chapter sets out the following:
- Adoption and application of best practice within the EIA process;
 - Stakeholder engagement, summarising consultation with statutory and non-statutory consultees, and wider public engagement;
 - Scope of the EIA, including a summary of the EIA Scoping process and the technical topics 'scoped in' and 'scoped out' of the ES;
 - Approach to the assessment of likely significant effects, specifically covering: approach to the assessment against a consistent baseline; future baseline; identification of sensitive receptors; information to inform assessment; assessment scenarios; implementation of mitigation; criteria for determining the level of effects and significance; and limitations/assumptions.

Adoption of Best Practice

- 2.3 As confirmed within **Chapter 1: Introduction**, this ES meets the requirements set out in Regulation 18, Paragraphs 3 – 4 and Schedule 4 of the EIA Regulations. In addition, the EIA process (and therefore the ES) has been undertaken with due consideration of the following guidance documents:
- Ministry of Housing, Communities and Local Government, and Department for Levelling Up, Communities and Housing, Planning Practice Guidance (PPG)¹; and
 - IEMA (now ISEP) Impact Assessment Guidelines: Implementing the Mitigation Hierarchy from Concept to Construction².

Consultation

- 2.4 The following sections of this Chapter set out the consultation and engagement process that has been undertaken with stakeholders, consultees and the public, including through the EIA Scoping process.
- 2.5 The Project Team has undertaken technical consultation with relevant consultees to inform the scope, assessment methodology / approach and the outputs of baseline data collection activities (in some instances). The specifics of technical consultation are reported in **Technical Chapters 6 and 7** and **Chapter 8**, where undertaken.

Stakeholder and Public Engagement

- 2.6 In addition, consultation with the public was undertaken between 23rd February to 9th March 2026, and included delivering leaflets to properties to 593 addresses, a dedicated project website including a dedicated project email address and online feedback form. Additional consultation was undertaken with residents in closest proximity to the Site including distribution of letters and a site visit. Details of the public consultation events are provided in the **Statement of Community Engagement**.
- 2.7 The environmental related comments raised and where these are considered within the ES are summarised in **Table 2.1**.

Table 2.1: Summary of Environment Related Public Feedback

Topic	General Comment	Relevant Technical Chapter
Landscape and Visual	Impacts on landscape character and views from the existing properties and bridleways. Concerns regarding lack of open space adjacent to Lopes Close.	Impacts on biodiversity are assessed in Chapter 6: Landscape and Visual .
Biodiversity	Concerns regarding biodiversity on the Site and displacement of species from the Site in-combination with other developments in the area. Also concerns regarding removal of vegetation and type of landscaping as part of the Proposed Development	Impacts on biodiversity are assessed in Chapter 7: Biodiversity .
Traffic and Access	Highways concerns including traffic volume, vehicle speeds and accidents. Concerns regarding existing public transport.	Impacts of traffic from the Proposed Development are assessed in Chapter 8: Assessment of Cumulative Effects and Appendix 8.1 . Further details of access arrangement and active travel measures and public transport are considered in the Transport Assessment (TA) .
Drainage and Flood Risk	Concerns regarding reduced infiltration and increase in surface water runoff due to the Proposed Development.	Impacts on flood risk are considered in the Flood Risk Assessment and Drainage Strategy .
Noise and Vibration	Concerns regarding noise pollution associated with increased traffic.	Impacts on noise and vibration are considered in the Noise Impact Assessment .
Air Quality	Concerns regarding air pollution associated with increased traffic.	Impacts on air quality are assessed in the Air Quality Assessment .

Topic	General Comment	Relevant Technical Chapter
Cultural Heritage	Concern regarding the impact of construction traffic on Blackmore House Listed Building and character of the area.	Impacts on cultural heritage are considered in the Archaeological and Heritage Assessment .
Socio-economics and Human Health	Concerns regarding access to educational and healthcare facilities.	Consideration of educational and healthcare facilities is provided in the Planning Statement .

EIA Scoping

- 2.8 A request for an EIA Scoping Opinion, together with an EIA Scoping Report (**Appendix 2.1**), prepared in line with Regulation 15 of the EIA Regulations, was submitted to Wiltshire Council in November 2025. A Scoping Opinion was adopted on the 7th January 2026; and is provided in **Appendix 2.2**. A summary of the responses and how they have been addressed within the ES is provided in **Table 2.1**.

Table 2.2: Summary of EIA Scoping Consultation Responses

Consultee	Summary of Comments	Response to Comment
Wiltshire Council	Agrees with the scope provided within the EIA Scoping Report (Appendix 2.1) and confirms <i>"Section 12 of the Scoping Report 'Summary of EIA Scoping Report' is agreed with regards those technical topics identified and proposed to be 'scoped out' and technical topics to be 'scoped in' of the EIA."</i> Section 11 of the Scoping Report on the Cumulative Effect Assessment Methodology is agreed.	ES has been undertaken in accordance with the scope provided in the EIA Scoping Report. Where there are exceptions to this, the changes are presented below under 'Updates Since EIA Scoping'. Details of the cumulative effects and additional Cumulative Projects for assessment are detailed in Chapter 8: Assessment of Cumulative Effects .
	Landscape and Visual: Requests assessment of cumulative landscape and visual effects and to include: PL/2023/11188; PL/2024/07097; PL/2024/10345; PL/2024/10624; PL/2025/06105; PL/2025/06749; Green and Blue Infrastructure (WCS Core Policy 52) and the Wiltshire GBI strategy.	Assessment of cumulative effects is detailed in Chapter 8: Assessment of Cumulative Effects . With the exception of PL/2024/10624 which is 50km away and has therefore been scoped out of the assessment in accordance with the proposed methodology, all other schemes have been included in the ES. The ES assesses the potentially significant effects at a project level and therefore assessment of policy has also been excluded in accordance with the proposed methodology in the EIA Scoping Report and detailed in in

Consultee	Summary of Comments	Response to Comment
		Chapter 8: Assessment of Cumulative Effects. Viewpoint locations for assessment of cumulative effects has been agreed with Wiltshire Council as detailed in Chapter 6: Landscape and Visual.
	Ecology and Biodiversity: - Requires assessment and consideration of water vole, Great Crested Newts (GCN) and Beaver. - Biodiversity Net Gain (BNG) assessment is required. - The application should include a comprehensive green and blue infrastructure strategy that retains existing wildlife corridors and creates new ones to maintain habitat connectivity. The ES should consider any mitigation and enhancement measures approved for the adjacent planning application to ensure a coordinated approach to wildlife protection and enhancement.	Assessment of water voles, GCNs and beavers is detailed in Chapter 7: Biodiversity. An assessment of BNG is provided in the Biodiversity Net Gain assessment report and Appendix 7.16. Details of the green and blue infrastructure are detailed in Chapter 4: The Proposed Development and shown on Figure 4.1 (Composite Parameter Plan). Ecological mitigation is detailed in Chapter 7: Biodiversity and ES Volume (Vol) 3: Environmental Management Plan (EMP).
	Transport and Accessibility: Cumulative projects Land South of Snarlton Farm, Snarlton Lane, Melksham and Land north of the A3102 should be included in the assessment. Construction Traffic Management Plan (CTMP) required.	The Cumulative Projects recommended for assessment are included within the ES (Cumulative Projects 8 and 9) as detailed in Chapter 8: Assessment of Cumulative Effects. A CTMP will be provided as detailed in Chapter 4: The Proposed Development and ES Vol 3: EMP.
	Cultural Heritage: Agrees cultural heritage can be scoped out of the ES but that impacts on assets to the east on rising land of Sandridge including the Sandridge Park Estate and Sandridge Tower should be considered.	Assessment of assets to the east on rising land of Sandridge including the Sandridge Park Estate and Sandridge Tower will be assessed within the Heritage Assessment.

Consultee	Summary of Comments	Response to Comment
Natural England	Standard response provided on climate change and annex (Annex A) 'Natural England Advice on EIA Scoping'.	Climate change will be addressed within Sustainability Appraisal . Effects of air quality are addressed in the Air Quality Assessment (which confirms that there are no statutory designated ecological sites within the relevant screening distances, and therefore have been excluded from the assessment). Potential effects on ecology and landscape are provided in Chapter 6: Landscape and Views and Chapter 7: Biodiversity .
Environment Agency	- Water, wastewater and a healthy water environment to enhance the natural environment should be considered. - Sustainable design and construction should be implemented. - Information on biodiversity impacts and opportunities should inform all stages of the development. - Groundwater and Contamination: Potential contamination should be adequately investigated. - Pollution prevention during construction - The waste hierarchy should be followed.	Details of flood risk and drainage are detailed within the Flood Risk Assessment and Drainage Strategy. Information on biodiversity impacts and opportunities are provided in Chapter 6: Landscape and Views and Chapter 7: Biodiversity and ES Vol 3: EMP. Details regarding waste strategies during, construction and contamination/pollution prevention during construction are detailed in Chapter 4: The Proposed Development and ES Vol 3: EMP.
Wiltshire Council Drainage Team	Recommendation for methodology for a site specific Flood Risk Assessment (FRA) and drainage strategy.	Details of the methodology and assessment of flood risk and drainage are detailed within the Flood Risk Assessment and Drainage Strategy .

Updates Since EIA Scoping

Evolution of Site Boundary / Proposed Development

- 2.9 Since the preparation of the EIA Scoping Report, there has been a reduction to the Site boundary. The area of existing woodland to the south east has been excluded from the Site/Application boundary. This has resulted in a reduction to the Site boundary from approximately 31ha to 27.41ha.

Evolution of Scope

- 2.10 Whilst the EIA Scoping Report (**Appendix 2.1**) sought to establish the overall framework for the ES in relation to the environmental topics and likely significant effects, the Proposed Development and the strategies that underpin it have been refined or informed by further technical studies, modelling and analysis works and engagement with consultees.
- 2.11 This is considered to be in accordance with paragraph 038 of PPG which states that:
"...where it becomes evident during the assessment process...that a particular environmental factor is absent or unlikely to be significantly affected by a proposed development, there should be no need for further assessment of that factor even if it was identified in the scoping process..."
- 2.12 As a result, where the scope of the assessment proposed within the EIA Scoping Report has been altered or amended, this has been clearly identified within the Scope of Assessment section of **Technical Chapters 6 and 7** and within **Chapter 8**. This includes additional evidence and / or rationale for the alterations / related amendments to the scope of likely significant effects, where necessary.
- 2.13 Additionally, as a result of the iterative scoping process, all potentially significant effects for noise and vibration and air quality have also been scoped out of the ES. The effects 'scoped in' at EIA Scoping (**Appendix 2.1**) include:
- Noise & vibration from construction works;
 - Assessment of changes in road traffic noise cumulatively generated by the Proposed Development affecting nearby noise sensitive uses; and
 - Human health impacts as a result of operational phase vehicle emissions.
- 2.14 A summary of the evidence and / or rationale for scoping out these effects/topics is provided below and detailed in the **Noise Assessment** and **Air Quality Assessment** submitted with the Application.

Noise & vibration from construction works

- 2.15 Noise and vibration emissions from construction works associated with the Proposed Development have the potential to adversely impact existing noise receptors in the area (i.e. the existing dwellings along A3102).
- 2.16 Some impacts are generally unavoidable as construction activities are inherently noisy. However, such impacts will only occur for the duration of the works and are, therefore, temporary and it is expected that these impacts can be controlled via Condition as part of the project Construction Environmental Management Plan (CEMP).
- 2.17 It is typical for Local Planning Authorities to impose restrictions during the construction stage of developments (i.e. limits on noise emissions, hours of working, permissible equipment types etc.) via planning condition(s). Based on the above, noise and vibration generated from construction the Proposed Development on existing residential dwellings is not considered to be significant and will not be considered further in the EIA or reported in the ES.

Assessment of changes in road traffic noise cumulatively generated by the Proposed Development affecting nearby noise sensitive uses

- 2.18 Traffic flow data have been provided for the Proposed Development and Cumulative Project 1, and an assessment carried out, since the noise scoping chapter was originally prepared and the calculations show that there will be only negligible/ minor increases on all modelled road links in the worst-case transportation scenario.
- 2.19 Consequently, traffic noise generated from the Proposed Development on existing residential dwellings is not considered to be significant and road traffic noise impacts can therefore be scoped out of the ES.

Human health impacts (air quality) as a result of operational phase vehicle emissions

- 2.20 Traffic flow data have been provided for the Proposed Development and Cumulative Project 1, and a detailed atmospheric dispersion model was utilised to predict nitrogen dioxide (NO₂) and particulate matter (PM₁₀ and PM_{2.5}) concentrations at relevant existing receptor locations within the study area during the operational phase.
- 2.21 The findings indicate that pollutant concentrations at all locations will be below the relevant Air Quality Objectives (AQOs) during the operational stage. Taking into account the predicted extent and magnitude of changes in NO₂, PM₁₀ and PM_{2.5} concentrations at relevant receptors, the overall effect of the Proposed Development is considered to be 'not significant', with regard to air quality, with no requirement for additional mitigation and are therefore scoped out from further consideration within the ES.

The Scope of the EIA

- 2.22 The technical topics 'scoped in' and 'scoped out' are summarised below.

Technical Topics 'Scoped In'

- Landscape and Visual (**Chapter 6**); and
- Biodiversity (**Chapter 7**).

- 2.23 The technical topic Transport and Access has been 'scoped in' in relation to in-combination effects only, as effects are for the Proposed Development in isolation are considered to be Not Significant. The assessment of in-combination effects are considered in **Chapter 8: Assessment of Cumulative Effects**.

Technical Topics 'Scoped Out'

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

- 2.24 The evidence base to support the ‘scoping out’ of these technical topics is presented above (for noise and air quality) and in the EIA Scoping Report (**Appendix 2.1**). The scope of works within the EIA Scoping Report (**Appendix 2.1**) and has been agreed as part of the EIA Scoping Opinion (**Appendix 2.2**).
- 2.25 Whilst these topics are scoped out of the ES, they will be addressed through stand-alone Application reports (see **Chapter 1: Introduction**).

Approach to Assessment

Overview

- 2.26 This section outlines the approach to the assessment of likely significant environment effects adopted, as reported within this ES.
- 2.27 The methodologies for the assessment of likely significant effects of the Proposed Development during the construction and operational stages vary across the technical topics considered within the EIA process, largely due to technical specific guidance and best practice. Therefore, each of **Technical Chapters 6 – 7** and **Chapter 8: Assessment of Cumulative Effects**, sets out the specific technical assessment methodologies.
- 2.28 However, there are several aspects to the approach which require consistency across the ES. These aspects are discussed below with the aim of identifying any nuances and how these have been accommodated with the approach.

Consideration of the Full Extent of Development and Baseline Conditions

- 2.29 The boundary upon which baseline data have been collected (i.e. study areas) varies between the technical topics and therefore these are reported specifically within **Technical Chapters 6 and 7** and **Chapter 8**.
- 2.30 However, all study areas include the Site, as defined in the Site Boundary Plan shown on **Figure 1.1**. This represents the maximum extent of permanent and temporary development and associated works for which permission will be sought.

Baseline Conditions

- 2.31 Schedule 4, Paragraph 3 of the EIA Regulations, states that an ES should include:

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

- 2.32 Likely significant effects as a result of the Proposed Development have been described in the ES in relation to the deviation from the baseline environment within the Site and relevant technical study areas. Therefore, it was necessary to establish the existing baseline environmental condition of the Site and study area. The baseline environment comprises the prevailing existing environmental characteristics and conditions of the Site and relevant technical study areas, based upon (where relevant and required):
- Site visits and surveys;
 - Desk-based studies;
 - Review of existing site-specific information or public literature;

- Modelling;
- Review of relevant national and local planning policies; and
- Consultation with the relevant statutory consultees through the EIA process.

2.33 The baseline conditions for the purpose of the ES vary dependent on the timing of the survey or the date when data sources were accessed. All baseline conditions are based upon data accessed or surveyed in 2025, as summarised in **Table 2.2**. Where relevant, surveys and other data obtained from third parties may be older than 2025, though may still be relevant to the baseline scenario for example, if there have been no notable changes or comprise the latest available information.

Table 2.3: Summary of Baseline Adopted within Technical Chapters 6 – 7

Chapter	Data Collection Type	Timeframe
Chapter 6: Landscape and Visual	Field assessment of the Site circumstances: landscape character and visual amenity and photoviewpoints photography	May- December 2025
	Desk top study to establish baseline conditions	April– July 2025
	Landscape and Visual Impact Assessment (LVIA) (Appendix 6.1)	September-December 2025
Chapter 7: Biodiversity	Desk study	April 2021, November 2023 and December 2025
	Extended Phase 1 Habitat survey (Appendix 7.4)	May 2021, July 2023 and May 2024
	Hedgerow survey (Appendix 7.6)	May 2021 and May 2025
	Great crested newt survey (Appendix 7.7)	April 2021 and May 2024
	Reptile survey (Appendix 7.8)	April – June 2021 and April – May 2025
	Breeding bird survey (Appendix 7.9)	April – June 2025
	Barn owl survey (Appendix 7.10)	April 2021 and May – July 2024
	Hazel dormouse survey (Appendix 7.11)	April – October 2021
	Badger survey (Appendix 7.12)	June 2025
	Bat roost survey (Appendix 7.13)	April 2021, May 2024 and May – July 2025
	Bat activity survey (Appendix 7.14)	May - October 2024

Chapter	Data Collection Type	Timeframe
	Otter and water vole survey (Appendix 7.15)	April and August 2021 May and August 2024
	UKHab survey and Habitat Condition Assessment (HCA) (Appendix 7.16)	June 2024
Transport and Access (Chapter 8: Assessment of Cumulative Effects)	Traffic Surveys	June 2025
	Transport Scoping Note	December 2025
	Transport Assessment	January 2026
	Framework Travel Plan	January 2026

- 2.34 Throughout the EIA, the origin of all third-party data, the dates of surveys and the dates when data sources have been accessed are clearly outlined within the relevant **Technical Chapters 6 – 7**, and **Chapter 8**, alongside any limitations or assumptions.

Future Baseline and Receptors

- 2.35 Schedule 4, Paragraph 3 of the EIA Regulations states that an ES should include:

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

- 2.36 As required under the EIA Regulations, the ES reports the future baseline scenario under a ‘do nothing’ scenario, which is further discussed in **Chapter 5: Consideration of Alternatives**. However, the future baseline scenario is discussed within each of the **Technical Chapters 6 – 7**. The discussion is associated with how the Site and study area may change assuming the Site was not developed further, and the existing management regime was maintained and is for information only.
- 2.37 Consideration has been given to future sensitive receptors of the Proposed Development (i.e. future residential receptors and users of the Site). Although the consideration of such receptors is not specifically required by the EIA Regulations, these receptors have been considered to provide certainty to Wiltshire Council that the Proposed Development is unlikely to create future issues when operational.
- 2.38 As such future receptors have been considered where relevant which is limited to the assessment of in-combination effects of transport and access (**Appendix 8.1**). Baseline traffic surveys were undertaken in 2022 and adjustments have been made to the future baseline traffic flows to allow for completion of developments since the time of the surveys in 2022, in addition to consideration of committed development as detailed below under ‘Cumulative traffic scenarios’.

Identification of Sensitive Receptors

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

“a description of the factors specified in Regulation 4(2) likely to be significantly affected by the development: population, human health, biodiversity (for example fauna and flora); land (for example land-take), soil, (for example organic matter, erosion, compaction, sealing),

water (for example hydromorphological changes, quantity and quality), air, climate (for example greenhouse gas emissions, impacts relevant to adaption), material assets, cultural heritage, including architectural and archaeological aspects, and landscape.”

- 2.40 Consistent with the EIA Regulations, the identification of the aspects of the environment likely to be significantly affected by the Proposed Development has been identified and set out within **Technical Chapters 6 – 7**. These are summarised in **Table 3.1** in **Chapter 3: Site Context**.

The Proposed Development and Parameter Plans

- 2.41 As indicated in **Chapter 1: Introduction**, the Application is outline in nature.
- 2.42 The ES is required to provide sufficient information about the Proposed Development to meet the requirements of the EIA Regulations and to ensure that Wiltshire Council can reasonably be satisfied that they have sufficient information of the likely significant environmental effects of the Proposed Development.
- 2.43 The assessments undertaken as part of the EIA and reported in this ES are based on **Chapter 4: The Proposed Development** and Parameter Plans (**Figures 4.1 – 4.2**) which contain all information required to inform the EIA in a single location.

Quantum of Development

- 2.44 The quantum of development set out in detail in **Chapter 4: The Proposed Development**, is an upper limit to represent the possible development that will come forward and has been a key parameter used to assess likely significant environmental effects. The ES has been based on a residential development for up to 275 new residential dwellings. This has informed the assessment for the following topics:
- **Transport and Access (Appendix 8.1)** – Where traffic data have been generated on account of the number of dwellings.

Massing and Location

- 2.45 The scale and location of development as described in **Chapter 4: The Proposed Development** are the key parameters used to assess likely significant environmental effects for the following technical topics:
- **Chapter 6: Landscape and Visual** – Specifically the heights^a and location of proposed elements of built form are considered in relation to their visibility from a number of receptor viewpoints in the surrounding area; and
 - **Chapter 7: Biodiversity** – This assessment accounts for the location of new/enhanced areas of habitat in relation to both the built elements of the Proposed Development and off-site habitats.

^a Maximum heights shown on **Figure 4.2** exclude chimneys, flues, etc. Up to 10% of each storey heights is permitted to increase to the height of the neighbouring higher density zone, to allow for landmark buildings, gateway clusters, etc. The assessment of landscape and views has been based on maximum heights of 15m for a worst case assessment.

Assessment Scenarios

- 2.46 In accordance with the EIA Regulations, the EIA has assessed the likely effects arising from the Proposed Development, taking account of site preparation / enabling works, earthworks, remedial works and construction (collectively referred to as 'construction') and operational stages.
- 2.47 The following key scenarios have been assessed where relevant to each environmental topic (and likely significant effects):
- Peak construction – this varies across environmental topics and has not been attributed to a specific year, rather it is determined at what point the worst-case effect could occur. This has been clearly defined within the **Technical Chapters 6 – 7**; and
 - Operation – this considers environmental effects associated with the full operation of the Proposed Development, once completed (2033).
- 2.48 As set out in **Chapter 4: The Proposed Development**, construction is anticipated to commence in 2027, with first occupation in 2028 and construction being completed over a period of 6 years with final completion and occupation is anticipated in 2033. Where relevant, the assessments within **Technical Chapters 6 and 7** and **Chapter 8** have therefore considered the construction and operational stage of the Proposed Development in line with these dates. Exceptions to this include:
- **Chapter 6: Landscape and Views** – The operational stage assessment utilises a Year 1 and Year 15 of operation to appraise the effectiveness of proposed vegetation planting upon its maturity. In doing so, the landscape and visual effects of the Proposed Development are likely to be reduced in Year 15 where it is more effectively screened from receptors' views; and
 - **Chapter 8 / Appendix 8.1 (Transport and access)** – Assessment of road vehicle traffic utilises a future 'without development' opening year of 2028 for comparison purposes and is considered to be a worst case.

Cumulative traffic scenarios

- 2.49 As stated above impacts from transport and access are considered to be Not Significant for the Proposed Development in isolation; further details of which are provided in the **Transport Assessment (TA)**.
- 2.50 An assessment of transport and access is limited to assessment of potentially significant effects of the Proposed Development, in-combination with other Cumulative Projects (see **Chapter 8: Assessment of Cumulative Effects**).
- 2.51 The TA has a different set of criteria for the selection of 'cumulative projects' or 'committed development' to that of the EIA. As detailed above the baseline traffic surveys were undertaken in 2022 and adjustments have been made to the future baseline traffic flows to allow for completion of developments^b since the time of the surveys in 2022. In addition,

^b Land East of Spa Road, Melksham (planning ref: 14/10461/OUT) – 450 residential dwellings, adjusted to 345 dwellings to allow for completions at the time of the traffic surveys (2022) and Land South of The Spa, Melksham (planning ref: 16/01123/OUT) – 235 residential dwellings adjusted to 99 dwellings to allow for completions at the time of the traffic surveys.

traffic flows for Cumulative Projects 8 and 13 have also been included. All other Cumulative Projects (with the exception of Cumulative Projects 8 and 13) listed in **Chapter 8** included for assessment in the EIA, have been excluded from the highway assessment due to their negligible trip generation, or because traffic from that development does not affect the Study Area. This is likely to be with the exception of Cumulative Project 1.

2.52 The only cumulative project considered as a separate cumulative traffic scenario (outside of the baseline scenarios) is Cumulative Project 1. Given the location of Cumulative Project 1, immediately adjacent to the west of the Site and likely common receptors with the Proposed Development it is considered appropriate to assess the potential impact of this Cumulative Project separately.

2.53 Further details are provided in **Chapter 8: Assessment of Cumulative Effects**.

Implementation of Mitigation and Monitoring

2.54 Schedule 4, Paragraph 7 of the EIA Regulations states that an ES should include:

“a description of the measures to avoid, prevent, reduce, or if possible offset any identified significant adverse effects on the environment and, where appropriate, of any proposed monitoring arrangements (for example the preparation of a post-project analysis). That description should explain the extent, to which significant adverse effects on the environment are avoided, prevented, reduced or offset, and should cover construction and operational phases.”

2.55 Regulation 26 states that when determining an application consideration should be given to ‘whether it is appropriate to impose monitoring measures’ including the parameters to be monitored and the duration of the monitoring.

2.56 In accordance with IEMA Guidance and the EIA Scoping Report (**Appendix 2.1**), three types of mitigation have been identified and used within the ES, comprising;

- **Primary:** modifications to the location or design of the Proposed Development made during the pre-application stage that are an inherent part of the project;
- **Secondary:** actions that will require further activity in order to achieve the anticipated outcome. These would be included within the ES following the assessment of effect, under the ‘Secondary Mitigation or Enhancement’ section, before the reporting of the ‘residual’ effects. It is anticipated that such measures would be secured by condition; and
- **Tertiary:** actions that would occur with or without input from the EIA feeding into the design process. These include actions that will be undertaken to meet other existing legislative requirements, or actions that are considered to be standard practices used to manage commonly occurring environmental effects. There needs to be a 90% level of confidence that these will be implemented, and they need to be specific with a clear timescale for implementation and responsibility.

2.57 The design process has been informed by extensive studies/surveys/modelling so that potential effects are well understood and primary mitigation has been identified and developed. The Proposed Development has evolved to take account of the environmental constraints and opportunities within the Site and study area. Such evolution, as defined

above, constitutes primary mitigation and therefore for the purpose of the EIA such measures are considered as part of the Proposed Development and therefore set out in **Chapter 4: The Proposed Development**.

- 2.58 Those measures considered to constitute tertiary mitigation are also considered part of the Proposed Development and set out in **Chapter 4: The Proposed Development**.
- 2.59 Therefore, **Technical Chapters 6 – 7** have considered relevant primary and tertiary mitigation for both the construction and operational stages prior to undertaking their assessment of likely significant effects. Following the conclusion of effects based on the Proposed Development (inclusive of primary and tertiary mitigation) any further mitigation measures or monitoring arrangements have been identified (i.e. secondary mitigation).
- 2.60 The application of secondary and tertiary mitigation is only considered appropriate if there is a high level of confidence (i.e., >90%) in the mechanism for implementation (by the Applicant or third party).
- 2.61 Consideration is then also given to any indirect effects of the secondary mitigation alongside the likelihood and confidence of implementation which is evaluated when determining the residual effect.
- 2.62 The primary, tertiary and secondary mitigation detailed within **Technical Chapters 6 – 7** are summarised in **Volume 3: Environmental Management Plan**.

Determining Level of Effect and Significance Criteria

- 2.63 A four-step approach has been adopted to define effects as outlined below:
- Step 1: Define environmental sensitivity;
 - Step 2: Define magnitude of change;
 - Step 3: Define level of effect; and
 - Step 4: Conclude on significance.
- 2.64 The method for assessing the level of effect has varied between technical topics but in principle has been based on:
- The environmental sensitivity (or value / importance etc., as appropriate to the environmental topic) of a receptor or receiving environment to change, including aspects such as adaptability, tolerance or recoverability; and
 - The magnitude of change (or impact) from the baseline conditions, including aspects such as probability / likelihood of occurrence, geographical extent, complexity, duration, frequency and reversibility (i.e. temporary and permanent).
- 2.65 Sensitivity (or value/importance etc.) has been assessed on a scale of high, medium, low and negligible and magnitude of change on a scale of large, medium, small and negligible. Where deviations from these scales is required to meet specific technical guidance this is outlined, where relevant, in **Technical Chapters 6 – 7** and **Appendix 8.1**.

- 2.66 Other factors such as feedback from stakeholders, relevant legislation, international / national / regional / local standards and guidance and the inter-relationship between effects (both cumulatively and in terms of potential effect interactions) have also been considered, where appropriate.
- 2.67 The assignment of the level of effect has been based on professional judgement and the matrix below (**Table 2.3**) is intended to be a tool to assist with the process. Whilst the matrix provides ranges, this is to guide the competent expert and a definitive assessment of level of effect has been provided for each effect.

Table 2.4: Matrix to support determining the level of effect

Magnitude of Change	Sensitivity (or value / importance)				
		High	Medium	Low	Negligible
	Large	Major	Moderate to Major	Minor to Moderate	Negligible
	Medium	Moderate to Major	Moderate	Minor	Negligible
	Small	Minor to Moderate	Minor	Negligible to Minor	Negligible
	Negligible	Negligible	Negligible	Negligible	Negligible

- 2.68 The following terms have been used to define the level of the effects identified and these can be 'beneficial' or 'adverse':
- **Major effect:** Where the Proposed Development is likely to cause a considerable change from the baseline conditions and the receptor has limited adaptability, tolerance or recoverability or is of the highest sensitivity;
 - **Moderate effect:** Where the Proposed Development is likely to cause either a considerable change from the baseline conditions at a receptor which has a degree of adaptability, tolerance or recoverability or a less than considerable change at a receptor that has limited adaptability, tolerance or recoverability;
 - **Minor effect:** Where the Proposed Development is likely to cause a small, but noticeable change from the baseline conditions on a receptor which has limited adaptability, tolerance or recoverability or is of the highest sensitivity or a considerable change from the baseline conditions at a receptor which can adapt, is tolerant of the change and / or can recover from the change; and
 - **Negligible:** Where the Proposed Development is unlikely to cause a noticeable change at a receptor, despite its level of sensitivity or there is a considerable change at a receptor which is not considered sensitive to a change.
- 2.69 For **Chapter 6: Landscape and Visual**, guidance on the nature of the effect requires that differing criteria or scales for determining significance are to be used. However, there has been consistency of terminology and conclusions to tie in with the above matrix. This ensures that the conclusions of the different effects can be compared during the decision-

making process and robustly considered within the cumulative effects assessment. The assessment methodology adopted is set out in **Technical Chapters 6 – 7** and **Appendix 8.1**.

- 2.70 A conclusion has then been provided as to whether the effect is ‘Significant’ or ‘Not Significant’ based on professional judgement. As such, significance has only been concluded for residual effects (i.e. following the application of ‘Secondary Mitigation or Enhancement’ measures).
- 2.71 Effects have also been described in line with the requirements of the EIA Regulations (i.e. as direct or indirect, short / medium / long-term and temporary or permanent).
- 2.72 **Technical Chapters 6 – 7** provide a summary of effects table, which outlines the effects assessed, associated sensitive receptors, residual effects and whether the effect is ‘Significant’ or ‘Not Significant’.
- 2.73 Cumulative effects have been considered as a single co-ordinated assessment (**Chapter 8: Assessment of Cumulative Effects**).

Limitations and Assumptions

- 2.74 Schedule 4, Paragraph 6 of the EIA Regulations state that an ES should include:

“...details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the require information and the main uncertainties involved.”

- 2.75 Where **Technical Chapters 6 – 7** and **Chapter 8** experience limitations or are based on assumptions these have been clearly identified within the relevant chapter.

Co-ordination of EIA and HRA

- 2.76 Regulation 27 of the EIA Regulations states:

“Where in relation to EIA development there is, in addition to the requirement for an EIA to be carried out in accordance with these Regulations, also a requirement to carry out a Habitats Regulation Assessment, the relevant planning authority or the Secretary of State, as the case may be, must, where appropriate, ensure that the Habitats Regulation Assessment and the EIA are co-ordinated.”

- 2.77 A single European-designated site lies within 10km, which is Bath and Bradford on Avon Bats Special Area of Conservation (SAC), located 9.4km to the northwest. This SAC is primarily designated for the presence of greater horseshoe bat and Bechstein’s bat.
- 2.78 A HRA has not been undertaken, as the potential effects from the Proposed Development on Bath and Bradford on Avon Bats SAC have been assessed and determined that all direct or indirect effects are negligible which are considered to be Not Significant.
- 2.79 Details of the outcomes of these appraisals are set out within Chapter 7 of the EIA Scoping Report (**Appendix 2.1**).

References

¹ Planning Practice Guidance (PPG) – Guidance: Environmental Impact Assessment, Paragraph: 002 Reference ID: 4-002-20140306. Available at: <https://www.gov.uk/guidance/environmental-impact-assessment>.

² Institute of Environmental Management and Assessment (IEMA) Impact Assessment Guidelines: Implementing the Mitigation Hierarchy from Concept to Construction August 2024.