

Forest Farm, Chippenham
Environmental Statement
July 2026

Technical appendix A:
Scoping



Forest Farm, Chippenham
Scoping response report

Gleeson Land
July 2026

tor
&co

1 Introduction

- 1.1 This report summarises the results of the scoping consultation undertaken by tor&co on the proposed residential development at Forest Farm, Chippenham. A scoping report was submitted to Wiltshire Council and a number of other organisations (table 1) on 12 March 2025.
- 1.2 This scoping consultation response document presents the key issues raised by the consultees and provides responses to each of the comments. Where applicable, cross references are made to where the issues have been addressed in the environmental statement (ES). The scoping report is included in appendix 1 and copies of the consultees' responses are included in appendix 2.

Table 1: Organisations consulted as part of the scoping process

Organisation	Contact name	Position / department	Response received
Wiltshire Council	James Taylor	Senior Planning Officer	16.04.25
	--	Highway Officer	16.04.25
	--	Landscape Officer	16.04.25
	--	Urban Design Officer	16.04.25
	--	Public Protection Officer	16.04.25
	--	Open Space Officer	16.04.25
	--	Archaeology Officer	16.04.25
	Megan Macpherson	Drainage Officer	31.03.25
	--	Ecology Officer	16.04.25
	Helen Garside	Principal Conservation Officer	07.04.25
	--	Climate team	--
	--	Housing Officer	--
	--	Rights of Way Officer	--
	--	Strategic Planning Officer	--
Natural England	Chloe Lancaster	Consultations Team	19.03.25
Environment Agency	Ellie Challans	Sustainable Places – Planning Specialist	27.03.25
Historic England	Jacqueline Smith	Inspector of Historic Buildings and Areas	16.04.25
Active Travel England	--	--	16.04.25
Sport England	--	--	16.04.25
Wessex Water	--	--	--
Wiltshire Police Liaison Officer	--	--	--

2 Scoping consultation responses

Wiltshire Council⁽¹⁾

Comment	Response
Planning	
As the submission for a scoping opinion is a prelude to a likely planning application for development of a site that is part of a wider allocation in the emerging local plan, it is important to take this early opportunity to emphasise that the emerging local plan envisages <i>“a single comprehensive masterplan, phasing and delivery strategy for the development...prepared and approved by the council in advance of any planning application being submitted for the whole or part of the allocated site.”</i> Furthermore, it is envisaged that this will be prepared in consultation with the local community and the local planning authority. Additionally, any <i>“planning applications must be in accordance with the approved masterplan.”</i> Whilst this scoping opinion is necessary because of your request for it, it is the council's position that any proposal must be part of a comprehensive master plan.	Noted. While the local plan has been withdrawn, information on how the proposed development will relate to other developments in the vicinity is provided in the design and access statement submitted in support of the planning application.
The following key policies, legislation and guidance documents are relevant to the preparation of the EIA for the proposed development: • The Town and Country Planning Act 1990 (TCPA 1990) • Environmental Impact Assessment (EIA) Regulations 2017 • National Planning Policy Framework (NPPF) • Planning Practice Guidance (PPG) • Wiltshire Core Strategy (2015) • Calne Community Neighbourhood Plan 2 2023-2038 Made March 2025 • Chippenham Neighbourhood Plan 2023-2038 Made May 2024 Other relevant legislation: the scoping opinion should also refer to any specific legislation or guidance that may apply to the development, such as: • The Conservation of Habitats and Species Regulations 2017 (for European protected species and habitats) • The Wildlife and Countryside Act 1981 (for national protected species) • The Flood and Water Management Act 2010 (for flood risk and management) • The Climate Change Act 2008 (for carbon emissions considerations)	Brief information on relevant legislation, policy and guidance is provided in the ES topic chapters (4 to 10), with further detail provided in technical appendices C to H.

¹ Note that where the council's scoping opinion repeats responses from other consultees, these are set out in the tables relating to each individual consultee and not repeated in this response table to avoid duplication.

Comment	Response
The Air Quality Standards Regulations 2010	
The EIA scoping report provides a good starting point for assessing the environmental impacts from the proposed development. What it is hard to address at this stage are the cumulative impacts across the emerging wider strategic allocation. With some environmental constraints – arguably most notably traffic (and transport links), drainage, ecology, air quality and heritage – these are likely to be far more significant than when considering this proposal independently. It is essential that the ES makes a full and robust assessment of cumulative impacts of the emerging wider allocation and its pressures on infrastructure and the environment, especially as the local plan review progresses through examination.	Now that the local plan has been withdrawn, the assessment of potential cumulative effects has considered the elements of the former allocation that are at scoping stage or have submitted a planning application. The potential cumulative effects are assessed in chapter 11 of the ES.
Table 18.1 provides a useful summary of your starting point on what the likely significant environmental impacts of the development are going to be. It is key to consider this a starting point because this scoping opinion and the consultation responses from various stakeholder experts will help you to develop your thinking by providing further opinion and local context. Please do read all of the consultation responses provided here with some care and take a precautionary approach to scoping matters into the ES, mindful of cumulative impacts from the emerging site allocation. This is important because the latest housing numbers for Wiltshire mean that we can expect significant housing growth in the future.	Noted. Please see the sections and tables below for responses to the stakeholder comments and how these have been addressed in the EIA.
The approach to cumulative impacts at paragraph 17.1 needs to be explicitly more inclusive of this. It will not be adequate to only consider approved development or development for which planning permission is currently being sought and may be approved prior to your scheme. This approach is unlikely to properly assess likely significant cumulative environmental impacts. The broader approach set out at paragraphs 17.2 and 17.3 is proportionate, and it is encouraging and aligns better with how Natural England put this as <i>“plans and projects which are reasonably foreseeable i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development...”</i>	A full list of the developments that have been included in the cumulative effects assessment is provided in ES chapter 3, while the potential cumulative effects are assessed in chapter 11. It should be noted that the 2017 EIA Regulations only require consideration of cumulative effects with existing or approved projects.
A preferred approach would be for EIA to accompany a project / (application) encompassing the entire emerging LP site allocation rather than small parts.	Noted. The potential cumulative effects are assessed in chapter 11 of the ES.
To aid the evolution of your preliminary views as you begin working on your EIA submission and ES, please note the following specific comments and all the consultation responses included as appendices.	Please see sections and tables below for responses to consultee comments.
Landscape and visual impact. Your preliminary view has already scoped in landscape and visual impacts. This is agreed. The EIA should assess the potential effects of the development on the character and quality of the landscape and views. Please have particular regard to the comments of the council's landscape officer. You will note the suggestions to include 'landscape fabric' within scope and the observations on a slight expansion of the viewpoints that need to be assessed. You will also note the concern already expressed in relation to cumulative impacts and to take a robust assessment of this, the	The assessment of landscape effects in ES chapter 7 and technical appendix E includes consideration of landscape fabric elements. The additional viewpoints requested are broadly represented by several of the photoviewpoints assessed in ES chapter 7 and technical appendix E. The potential for

Comment	Response
scope of assessment and viewpoints will need to be expanded in order to address the approach you set out at paragraphs 17.2 and 17.3.	cumulative landscape and visual effects with other developments in the area is assessed in chapter 11 of the ES.
Ecology and biodiversity. Your preliminary view has already scoped in ecology and biodiversity (natural heritage) impacts. This is agreed. The EIA should assess potential impacts on local biodiversity, including habitats and protected species. Specific surveys will be required for the site itself and must be up to date in order to allow a robust assessment at the point of determination. Please have particular regard to the ecology officer's comments in this regard. Again, cumulative issues here are a matter that will need careful attention, and the natural environment features likely to be impacted here do not work in isolation at this site alone. These are not static factors either, so this consideration has a very strong temporal factor beyond the confines of the site. It is clear from the concept plan within the emerging site allocation policy that this site has been envisaged as key to providing improved habitat creation, which supports the case for expanding survey work.	The potential effects on habitats and protected species are assessed in ES chapter 8 and technical appendix F. A range of surveys have been undertaken and the results of these are summarised in ES chapter 8 and set out in full in technical appendix F. The cumulative effects with other developments in the area are assessed in chapter 11 of the ES.
Air quality. Your preliminary view has already scoped in air quality impacts. This is agreed. Your initial reasoning has a focus on the impacts from road vehicles noting the nearby air quality management area (AQMA) in Calne. A related factor that needs to be considered is the implications of this development being delivered without a completed distribution route between the A4 and the A350 to the south of Chippenham. Without prejudice to any 'masterplan, phasing and delivery strategy' for the emerging allocation, an incomplete distribution route is more than 'likely'. Furthermore, it is a matter that needs to be taken further with the potential for wider strategically planned development also not producing a distributor road and finding alternative means of access. The consequences of this would likely be very significant over and above the impact you have provisionally identified. It would reach far beyond the impact to the Calne AQMA. This type of scenario should be manageable through delivery of well-planned (and master planned) development; however, it is important that the ES addresses such potential effects, albeit proportionately to the likelihood of them occurring. Please note the comments provided by environmental protection colleagues here.	The potential for effects on air quality is assessed in ES chapter 4 for the proposed development alone, ES chapter 11 for cumulative effects with other developments in the area, and technical appendix C. Now that the local plan has been withdrawn, the assessment of potential cumulative effects has considered the elements of the former allocation that are at scoping stage or have submitted a planning application, which does not include the full completion of the southern distributor link road.
Noise and vibration. This has been scoped out in your provisional assessment. That does not mean that it is not an important planning consideration that will not need to be assessed in any planning application. Furthermore, assessment will require information from you and the comments from colleagues in environmental protection will assist you further in determining how to proceed. These focus around managing noise during the construction and operational phases.	A stand alone noise assessment is submitted in support of the planning application, which addresses construction and post-construction noise effects and the potential for effects on the proposed development from existing noise sources.
Transport and accessibility. The EIA should include a transport assessment as you have indicated in scoping this within the ES. This needs to evaluate the effects of the development on the transport	The transport assessment (TA) forms technical appendix G to the ES. It includes assessment

Comment	Response
network. This should include potential impacts on traffic flow, road safety, public transport, and walking and cycling infrastructure. These are all issues you have already identified and are working towards. Please also note my comments above in relation to air quality and the scope of cumulative assessment work. The impacts of transport on air quality need to be considered similarly in terms of wider implications of increased traffic generation post-construction with or without the provision of a distribution route.	of potential effects on traffic flow, road safety, public transport and walking and cycling infrastructure, which are summarised in ES chapter 9. The cumulative traffic and transport effects are assessed in ES chapter 11.
Flood risk and drainage. You have not scoped these issues into your EIA work to date. You are directed to the responses received from drainage colleagues and the Environment Agency. These identify issues of surface water flooding at the site associated with a ditch (ordinary watercourse) feature and that the ground conditions indicate that infiltration is not a feasible means of discharge on the site. Singularly this may reasonably facilitate a conclusion that the proposal would not likely have a significant environmental impact. However, this is part of a wider strategic allocation and the cumulative impacts of addressing drainage and wastewater in the context of what Wiltshire Council has acknowledged to be a climate emergency poses greater concern. At this stage, exercising a precautionary approach in light of the limited information available about cumulative impacts on this issue, then this is currently considered to be a matter that should be scoped into the EIA and form a chapter within the ES rather than just a stand alone report.	The potential effects on flood risk and drainage are assessed in ES chapter 10 and technical appendix H. The cumulative effects are assessed in ES chapter 11.
The ES should address flood risk at the site and surrounding areas, including whether the development falls within a flood zone and any necessary mitigation measures. The drainage strategy should be reviewed to ensure adequate capacity and flood prevention measures in terms of all sources of flood risk and management of foul flows as well.	The assessment of effects in ES chapter 10 and technical appendix H includes consideration of all potential sources of flood risk and management of foul flows.
Cultural heritage. You have scoped in the potential impact of the development on heritage assets, including archaeology, listed buildings, conservation areas and historic parks and gardens. This conclusion is agreed. You have also considered scheduled monuments and the loss of the historic landscape character.	The potential effects on cultural heritage assets are assessed in ES chapter 6.
However, there is a case for widening the scope on cultural assets, considering the cumulative effect of the wider allocation on the historic landscape character. It is noted that there is no mention of the Wilts & Berks canal route that would be impacted by this proposal. Moreover, a feature here is the agricultural land management, which is expressed through features such as farmsteads set within open countryside. You are advised to have further regard to the potential for significant environmental impacts to this historic landscape character, especially through the lens of cumulative impacts with the wider emerging strategic allocation. There is clear synergy here with the work on landscape impacts. Furthermore, this is a theme raised by Historic England in their comments regarding non-designated heritage assets and use of photomontages as useful techniques. Additionally, you should note the views of the council's in-house conservation officer. They are seeking an expansion of the scoping work around heritage.	The potential for effects on the site's historic landscape character, Forest Farm and the Wilts & Berks Canal is assessed in ES chapter 6. The potential for cumulative cultural heritage effects is assessed in chapter 11 of the ES.

Comment	Response
Climate change and sustainability. It is necessary to consider both climate change mitigation and climate change adaptation. Given the scale of the development proposed, even if taken cumulatively, the scale and magnitude of greenhouse gas emissions globally that influence climate change mitigation are such that the impact here is not likely to be 'significant'. However, it remains an imperative that the development is planned in such a way to ensure that both embodied and operational carbon is minimised in accordance with the net zero 2050 timelines. You have mentioned only addressing operational carbon, so you need in any stand alone reports to cover both areas within a whole-lifetime carbon assessment that accords with RICS standards.	Measures to reduce the proposed development's greenhouse gas emissions are set out in ES chapter 2, with further detail provided in the energy and sustainability statement submitted in support of the planning application. A whole-lifetime carbon assessment has not been undertaken at this outline application stage because the necessary level of detail in relation to unit mix, construction materials and sourcing, future transport modes and usage and extent / volumes of different physical infrastructure (road layouts, parking facilities, non-domestic development etc) is not available.
Turning to climate change adaptation. The impacts of climate change have a degree of uncertainty, but it is likely we will experience greater storm events, increased temperatures, wildfires, and increased wind speeds. A development such as this will need to be able to cope with overheating, water scarcity and flooding. There is the potential for likely significant environmental impacts here, especially in relation to flood risks. On balance it is acceptable to address climate change adaptation as a theme across the ES (as indicated at paragraph 5.19 of the submitted scoping report), with a focus on sections like flood risk and drainage where impacts are likely to be most relevant. However, please have regard to the comments from the Environment Agency and urban design officer on this point as you develop your ES.	Measures to ensure the proposed development is able to adapt to climate change are set out in ES chapter 2, with further detail provided in the energy and sustainability statement submitted in support of the planning application. ES chapter 10 and technical appendix H explain how climate change has been taken into account in the flood risk assessment (FRA) and drainage strategy.
Health and wellbeing. The EIA should consider the potential effects of the development on local health and wellbeing including, as you have scoped in, increased demand for local facilities (such as education, health services, employment, and amenity and nature spaces); and impacts specific to health and wellbeing impacts around air quality and noise. Regard also needs to be had to potential for odours and nuisance from Wessex Water infrastructure, although this is not likely to be a significant environmental effect on this part of the emerging allocation so much as it will be on other parcels.	The potential effects on demand for local facilities are assessed in chapter 5 of the ES. Air quality effects are assessed in ES chapter 4 and technical appendix C, while noise was scoped out of the EIA. No significant noise effects were identified in the stand alone assessment report. The site is approximately 1.8 km from the Chippenham Water Recycling Centre to the west and no significant odour effects are therefore predicted on the proposed development.

Comment	Response
Waste and natural resources. Please note the comments above in terms of whole life carbon assessments and consider this in relation to the use of natural resources. This is the best means to plan a development to ensure minimal use of natural resources taking a whole life-cycle approach. Additionally, it is noted that the proposal involves a minority of land that is classed as best and most versatile agricultural land. However, the impact is not considered to be significant in the meaning of EIA. Your initial scoping out of issues in this regard is agreed, but please have regard to the various consultation responses relevant to this.	Noted. Please see above in relation to the whole life carbon assessment and the sections and tables below in relation to agricultural land.
Based on the scoping process and the relevant planning policies and legislation outlined in this report, the applicant should ensure that the EIA comprehensively addresses the key environmental issues already identified within their EIA scoping report. It is noted that these are preliminary findings and, as such, hopefully these comments and the consultation responses appended to this will help further inform the production of the ES.	As set out within this document, the scope of the ES has been expanded to address issues raised during the scoping consultation.
In summary, particular attention is drawn to the following matters over and above the conclusions you have initially drawn: • Cumulative impacts and widening the scope of this to ensure compliance with your own points at paragraphs 17.2 and 17.3 to address the effects of <i>“plans and projects which are reasonably foreseeable i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development”</i>...i.e. the emerging local plan review site allocation • Additional coverage in relation to landscape and visual impacts, e.g. including scoping of landscape fabric and expansion of potential viewpoints • In terms of ecology and the natural environment, scoping needs to increase to better ensure the use of up to date information and acknowledgement that impacts are likely to extend beyond the site boundaries into land where development can be foreseen • In terms of air quality, highways and greenhouse gas emissions, the potential impacts arising from development need to be scoped in. Furthermore, scoping in the impacts from this without a completed distribution route between the A4 and A350 and with cumulative impacts of reasonably foreseeable development will be necessary • Flood risk and drainage are areas that are likely to need to be scoped into the ES in light of local information, more robust consideration of cumulative impacts and the need to adapt to our changing climate • Cultural heritage considerations are within scope, but this needs to be expanded to include non-designated heritage assets when considering the cumulative impact from the emerging local plan review allocation and the overall area affected by the change in rural character	Please see above responses as to how these issues have been addressed in the EIA.

Comment	Response
It is trusted that the scoping opinion provided here guides you in ensuring that the EIA is robust and adequately covers all areas of likely significant environmental concern. Furthermore, that the need for additional emphasis on cumulative impacts and more assessment in that regard is noted. The LPA will expect to receive a detailed EIA in due course, addressing these issues and incorporating any feedback received from the consultees.	As set out within this document, the scope of the ES has been expanded to address issues raised during the scoping consultation.
Highways	
The proposal site was initially part of a master plan within the local plan review, which would have seen development connect the A4 at Pewsham with the A350 Lackham roundabout.	Noted.
This proposal must provide a suitable access arrangement apart from further connections to a southern connector road in order to bring forward this site for development. Outside of a master plan for a southern connection to the Lackham roundabout, any future plans for a roundabout arm access to the proposal site must be of sufficiently robust design to allow for future traffic use should further development come forward.	Full details of the proposed access roundabout are provided in the TA in technical appendix G.
The proposal is for a scoping opinion in terms of required provision for an EIA. There will be an environmental impact associated with a large development of 600 dwellings and associated services on the local road network with potential effects on driver and cyclist delay and severing of pedestrian links during construction.	The potential for effects on pedestrian severance and driver and non-motorised user delay as a result of increased traffic during and post-construction is assessed in ES chapter 9.
Construction traffic impact would be expected to be addressed within a construction environmental management plan (CEMP) and as it is considered transient is not therefore expected to be scoped within an EIA. Similarly, the effects of dust during construction can be mitigated somewhat through conditions within a CEMP.	Initial information on construction routeing and the proposed contents of a CEMP is set out in chapter 2 of the ES.
The most significant impacts on highways will be in regard to increased post-construction traffic, provision of new pedestrian and cycle provisions and the increase in public transport use, together with how these connect to the local area.	The potential effects on post-construction traffic, pedestrian and cycle provisions and public transport are assessed in ES chapter 9 and technical appendix G.
The methodology for provision of information within an ES can be dealt with in highway terms by the provision of a transport assessment (TA). A TA can assess the impact of the proposed development on the local highway infrastructure and provide modelling and although they can be scoped in the round within an EIA the required detail would be provided within a TA.	The TA is provided in technical appendix G.
The TA should make consideration for provision of pedestrian crossings between footways and bus stops, separate cycle and pedestrian accesses from vehicular accesses to the development. Any TA should also make provision for cycleways where enhancing local offerings can be achieved following guidance in LTN1/20. Utilisation of rights of way within the site boundary and connections to off-site locations should be sought.	Information on proposed crossings, footways, cycleways and accesses is provided in ES chapter 2 and technical appendix G.

Comment	Response
The TA should provide information on the new roundabout access onto the A4 through modelling utilising TRICS analysis to provide output on traffic requirements for the new layout and the effect on stacking along the A4 in relation to Pewsham roundabout. This analysis should provide modelled peak AM and PM traffic flow, as post-construction vehicular movements will increase along all aspects of the local network as a result of this development. Along with a fully scoped TA, the assessments provided in future applications should include a road safety audit one and two, including the provision of any proposed secondary or emergency access.	Detailed junction modelling and a road safety audit are provided in the TA in technical appendix G.
Although the site is not within an AQMA, the effects may exceed air quality targets within the Calne AQMA and this should be addressed with future submissions within an ES.	The potential for effects on the Calne AQMA is assessed in chapter 4 of the ES and technical appendix C.
The guidance for TA requirements should be taken from table 2.1 in the local transport plan LTP3 currently utilised, as LTP4 has not been adopted yet. Provision for cycleway enhancement and cycle parking should be included as per current Wiltshire policy and national guidance as contained within LTN1/20.	The TA in technical appendix G has been prepared in accordance with the requested guidance.
<i>Landscape</i>	
The main purpose of this response is to identify any obvious omissions or errors contained within the scoping report that will inform the landscape and visual baseline information to be used within the LVIA, and to comment on the scoping considerations informing initial judgements of the likely significant effects predicted to arise from the scale and nature of proposed development at this site location, i.e. those effects considered most likely to result in potential for significant environmental effects to be 'scoped in' (included) or unlikely to result in much potential for 'significant' environmental effects to be 'scoped out' (excluded) from the EIA, including considerations as an individual stand alone development, in combination with other cross-cutting subject matter EIA subject / topic areas, and cumulatively with other planned or consented developments of a similar nature.	Noted.
Section 10 of the submitted scoping report considers the potential for significant landscape and visual effects. The following observations / comments are intended to inform the LPA's feedback insofar as these relate to the EIA 'landscape and visual' subject matter / topic area. I don't identify any missing national or local landscape designations within the submitted EIA scoping report, and neither do I identify any missing landscape character assessments or additional landscape setting assessment / other relevant studies in addition to those already identified and referenced within the submitted EIA scoping report that should be used to inform the existing landscape baseline for the assessment.	Noted. The effects on landscape character and designated landscapes are assessed in chapter 7 of the ES and technical appendix E.
I note the inclusion of the initial landscape components identified with potential for significant effects to arise from the proposed development, included within table 10.1 (initial landscape and visual effects scoping checklist) within the scoping report. This checklist considers the following five components:	The assessment of landscape effects in ES chapter 7 and technical appendix E includes consideration of landscape fabric elements.

Comment	Response
• Landform / topography • Land cover • Landscape / townscape character • Protected landscapes / townscapes • Sensitive views I am surprised that the initial consideration of components does not include a 'landscape fabric' element, which would typically include existing trees, field pattern / hedgerows / other enclosures, walls / railings, watercourses / ponds / ditches etc. This is a landscape component that has potential for significant adverse and beneficial change effects. I appreciate that there may be cross-cutting with other ES chapters; however, landscape fabric / features should in my opinion be separated out from land cover (which I would typically understand to include permanent pasture or arable cropping, previously developed land etc) within assessment of landscape and visual baseline scenarios. The consideration of change from agricultural land to a new urban area is overly simplistic. The likely potential for significant effects to arise is viewed to be important to initially consider and separate out from land cover within the checklist and / or include justification for why the 'landscape fabric' within the site itself, and its immediate surroundings, is not justified as a specific landscape component to be included within the assessment.	
The applicant has specifically asked the LPA for feedback upon the suggested viewpoints to be used to inform the visual assessment included within the LVIA. The scoping report submission is not accompanied by a zone of theoretical visibility (ZTV) map. But I am familiar with the area and have previously agreed to the viewpoints used for the previous planning application at this site that was refused planning and then subsequently dismissed at appeal. I would be comfortable to agree the suggested viewpoints as illustrated within figure 5 (identified as viewpoint locations 1 to 11 inclusive, plus viewpoints A, B, Ci and Cii). However, I highlight that there is a live DMMO (Definitive Map Modification Order) application made to this council's highways / rights of way team. The application includes evidence to substantiate an upgrade of two lengths of existing rural footpaths to form a public bridleway, including an additional linking spur to and from the A4 London Road. The identified route does not appear to cross the application land, but passes close to it and abuts the southern boundary of the site along a short stretch. The DMMO application remains to be determined; however, it is recommended that the LVIA's visual assessment evaluates whether any existing proposed viewpoint, i.e. viewpoint A as illustrated within figure 5, would suitably represent the visual effects of development viewed from this potential new public bridleway receptor, or whether an additional viewpoint location would be necessary to include, somewhere along the new spur length to capture a worst case scenario. I have uploaded a copy of the DMMO application as a separate file attachment, so that the applicant can further review and establish the location of this potential upgraded and extended bridleway route.	A ZTV is provided in ES chapter 7 and technical appendix E. Where the proposed new length of bridleway between London Road and public footpath CALW 83 runs parallel to the site it is in the valley bottom, broadly at grade with the site, and separated from the site by mature vegetation along the canal, which heavily filters views of the site. This location is broadly represented by photoviewpoint 16 in ES chapter 7 and technical appendix E. Where the new bridleway runs adjacent to the site, it is also in the valley bottom and separated from the site by mature vegetation. This location is broadly represented by photoviewpoint 3. The proposed upgrades of public footpaths CHIP 49 and CALW 83 to bridleways are represented by photoviewpoints

Comment	Response
	4 and 6 in ES chapter 7 and technical appendix E.
The current submission does not elaborate within the methodology how cumulative effects will be assessed, including cumulative visual effects. It might prove that additional viewpoints may be required, or that the currently proposed viewpoints would be considered suitable for use in the assessment of cumulative visual effects. Elevated visual receptors located along the Limestone Ridge / Greensand Hills overlooking the site from the south, south west and south east are considered most likely to have potential for experiencing cumulative visual effects, i.e. VP10, 11, B, Ci, Cii (locations as currently illustrated on figure 5 within section 10 of the scoping report).	The potential for cumulative landscape and visual effects with other developments in the area is assessed in chapter 11 of the ES.
Urban design	
The intended locations for photo viewpoints from public receptors in figure 5, including the additional viewpoints (A to Cii) should enable a good coverage in relation to the setting of the built development, its possible expanse, general scale, height and massing.	The viewpoint photographs are provided in ES chapter 7 and technical appendix E.
I note in relation to wastewater processing capacity (16.4 and 16.9), the potential for cumulative effects given the scale of current housing developments listed in 17.3 and the rest of the South Chippenham site; and increased rainfall through climate change findings its way into the foul drainage system, the potential indirect environmental impact of this from discharge of untreated wastewater into rivers and watercourses that is a national issue. I am aware of housing developments employing pumped holding tanks and possible management charge cost of this to residents.	The potential for effects on the area's wastewater's processing capacity is assessed in ES chapters 10 (proposed development alone) and 11 (cumulatively with other developments).
Public protection	
Contaminated land. Within section 8.2, reference has been made to the site being greenfield, with no existing or historical industrial use. A small brickworks and clay pit are identified, however, marked as disused, with the site having potentially limited historic contamination from agricultural use. Upon checking historical maps, there are markers for unknown filled ground in two different areas, as well as a former forest brick works, which has a marker for combined potential contamination. We would therefore look to agree a condition at planning consultation stage asking for representative site investigations at the locations of the historical uses to determine the nature and extent of any land contamination, and if required the submission / implementation of a remediation scheme and subsequent verification.	The potential for effects from existing contamination is examined in the stand alone phase 1 geoenvironmental report submitted in support of the planning application.
Noise and pollution issues – transport noise. Information regarding noise and good acoustic design can be found in our Noise Technical Guidance.	Noted.
The development is proposing a new link road between the A4 and the A350, which is likely to impact amenity for new and existing dwellings. We will look to agree a suitably worded condition to ensure that occupiers of the existing and new dwellings are protected from adverse noise impacts. We will require a noise impact assessment that includes the following:	The stand alone noise assessment submitted in support of the planning application includes the required elements.

Comment	Response
A) An acoustic design scheme for protecting new and existing dwellings from external transport noise. B) Compliance with requirements of BS 8233:2014 and Professional Practice Guidance: Planning and Noise – New Residential Development (May 2017) (or subsequent versions) for transport noise.	
Commercial noise. The development proposed includes 600 dwellings and a retail centre. At this stage, it is not known what type of business will operate. There will always be conflict between a mixed use development where there are residential dwellings inter dispersed with commercial premises. Where this is the case, there are a number of impacts that are likely to affect amenity, and we would require details at the planning application stage that address the following and plans detailing the proximity of residential properties to commercial premises: - Hours of operation - Deliveries - Waste disposal - Noise generated from ventilation ducting - Patron noise - Noise from fixed plant and machinery - Transmission between dwellings Wiltshire Council would expect that ProPG: Planning & Noise, New Residential Development: Supplementary Document 2 Good Acoustic Design will be followed. Details can be found in our Noise Technical Guidance document.	Full details of the proposed local retail centre are not available at this outline application stage, so it is not possible to undertake a detailed assessment at this stage.
In order to minimise the impacts and prevent any creep of the background noise levels from fixed plant and machinery, we would look to agree a suitably worded condition requiring a BS 4142 assessment that details a scheme of mitigation / attenuation once the design and layout of the scheme is known. The scheme shall demonstrate that the rated level of noise from fixed plant and deliveries shall be -5 dB below background. Background levels are to be taken as a 15-minute LA90 at the boundary of the nearest residential noise-sensitive receptors. We will also require a post-installation noise assessment to confirm compliance with the noise criteria and any additional steps required to achieve compliance.	Noted.
BS 4142:2019. The assessment shall be submitted to the local planning authority together with a scheme of attenuation measures.	This will be undertaken at the detailed design stage.
As part of the government's future homes standard, it is likely that the development will have a mandatory requirement to fit the homes with Air Source Heat Pumps (ASHP) and therefore we will require that no ASHPs shall be installed until a noise assessment has been submitted to and approved in writing by the local planning authority. The noise assessment must demonstrate that the cumulative noise impact from all heat pumps installed at the development achieves a rating level of 35 dBLAeq15mins at 1 m of the façade of any residential property (including those outside of the development). The noise limit would	This will be undertaken at the detailed design stage.

Comment	Response
include the ASHPs at both full duty and when in reverse and defrost mode. The installation works shall be carried out in accordance with the approved details.	
Odour. Any commercial units that require mechanical air extraction or ventilation in the development must include a scheme of works for the control and dispersal of any atmospheric emissions, including odours, fumes, smoke and other particulates. The scheme must include full technical details and a risk assessment in accordance with appendix 2 and 3 respectively of the EMAQ <i>Control of odour and noise from commercial kitchen exhaust systems</i> guidance (Gibson, 2018). We advise that the ventilation system should discharge vertically at a height of at least 1 m above the heights of any nearby sensitive buildings or uses and not less than 1 m above the eaves.	The detailed design and occupants of the proposed local retail centre are not known at this outline application stage, so this information will be provided at the reserved matters application stage if required.
Construction. We will look to agree a CEMP that requires that no construction or demolition work shall take place on Sundays or Public Holidays or outside the hours of 08:00 to 18:00 Monday to Friday and 08:00 to 13:00 on Saturdays. The CEMP shall include details of the following relevant measures: • An introduction consisting of construction phase environmental management plan, definitions and abbreviations and project description and location • A description of management responsibilities • A description of the construction programme • Site working hours and a named person for residents to contact • Detailed site logistics arrangements • Details regarding parking, deliveries and storage • Details regarding dust and noise mitigation • Details of the hours of works and other measures to mitigate the impact of construction on the amenity of the area and the safety of the highway network • Communication procedures with the LPA and local community regarding key construction issues – newsletters, flyers etc	Noted. It is envisaged that a CEMP will be required by a planning condition.
Air quality. The application is close to the Calne AQMA and as such the applicant must undertake an air quality assessment (AQA) that quantifies the effect of the development on existing local authority air quality monitoring locations and sensitive receptors, as well as the proposed development. It must also identify and make adjustments for all core strategy-based developments in the development's locality. Use of CURED data in the AQA is expected, along with any other currently accepted approaches to AQA.	The potential for air quality effects, including on the AQMA, other sensitive receptors and on the proposed development, is assessed in ES chapter 4 and technical appendix C.
Open space	
Having read through the scoping report, there does not appear to be anything specific regarding open space and play to comment on at this stage. However, the developer may wish to be made aware that, should a planning application be submitted, the amount of open space and play will be calculated on dwelling bedroom numbers. They may also like to note that Chippenham Town Council will express an	Noted.

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interest in adopting public open space and play, and a request that there is an option for this included in a S106 agreement would be asked.	
Archaeology	
I agree that archaeology should be included within the EIA. The EIA should include a full report detailing the most recent phase of archaeological trial trench evaluation. It should also include a synopsis / overview of the various phases of archaeological work undertaken within the red line area in order that the impact of the proposed development on the archaeological resource can be better understood.	The potential effects on archaeology are assessed in chapter 6 of the ES. The full reports of the various phases of archaeological work are provided in technical appendix D.
Drainage	
We would expect the drainage-specific inputs to the EIA will largely be covered off through the FRA and Drainage Strategy for the development. As part of those, we would expect to see the following information included.	The FRA and drainage strategy forms technical appendix H to the ES.
Flood Risk. The Wiltshire Council Strategic Flood Risk Assessment, SFRA Data Explorer, has indicated that the site is located within flood zone 1 and therefore has a low level of risk from fluvial flooding. Some portions of the site have a high level of risk from surface water flooding. This flooding is largely associated with a ditch (ordinary watercourse) that runs through the site, from east to south.	The risk of fluvial and surface water flooding is assessed in chapter 10 of the ES and technical appendix H.
A site investigation undertaken in October and November 2023 revealed the site to be underlain entirely by Kellaways Formation (comprising of Kellaways Sand Member and Kellaways Clay Member). Ground investigations revealed shallow groundwater (<1 m bgl) across the site and BRE365 soakaway testing also revealed poor permeability. It is accepted that infiltration is not a feasible means of discharge on the site.	The results of the intrusive investigations are provided in technical appendix H.
A (final) site-specific flood risk assessment (FRA) should be submitted in support of this application. The site-specific FRA should demonstrate that the site is not adversely affected by flood risk from different sources, and how the flood risk from all sources will be managed without increasing flood risk to the development itself or elsewhere. It should also outline the proposed drainage strategy for the site. The applicant is referred to the Environment Agency's advice on how to prepare a FRA, as well as their standing advice for vulnerable developments.	The FRA in technical appendix H has been prepared in accordance with the Environment Agency's guidance and contains the required elements.
The applicant shall review all published section 19 reports on historic flooding within Wiltshire, and incorporate these into their holistic assessment of flood risk, and historic flood events. These reports can be found on the council website.	Information on historic flooding is provided in the FRA in technical appendix H.
Drainage Strategy / Drainage Design. The applicant should note that in all instances the preference should be to utilise blue-green SuDS that provide multi-faceted benefits to the site (in terms of water quantity, quality, amenity and biodiversity); for example, for attenuation features preference should be given to use of swales / ponds / detention basins (if technically feasible) instead of attenuation tanks. The applicant should adopt a holistic approach to planning the site, and sufficient space for SuDS features	The proposed drainage design incorporates SuDS. It is summarised in chapter 2 of the ES and set out in full in technical appendix H.

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should be provided at an early stage in order to fulfil the requirements of NPPF paragraph 169; the LLFA will not accept statements that there is insufficient space for SuDS or that SuDS have not been utilised due to cost.	
Any proposals should be designed in accordance with the Non-statutory Technical Standards for Sustainable Drainage Systems and the latest SuDS Manual (C753).	The drainage strategy has been designed in accordance with these documents.
The LLFA would consider this to be a greenfield site for the purposes of planning. The applicant will be required to submit calculations that demonstrate post-development runoff rates in accordance with Wiltshire Council's betterment policy can be achieved. The (DRAFT) FRA and Drainage Strategy state that post-development runoff rates will provide 30% betterment over Qbar. It is acknowledged that for the higher return period rainfall events this will provide betterment; however, this will not provide the required level of betterment for lower return period events (such as the 1-in-1 year rainfall event). Wiltshire Council's betterment policy for greenfield sites states: <i>"With regards the control of surface water discharges from greenfield sites, Wiltshire Council requires post-development discharges to provide 30% betterment over pre-development (greenfield) discharges for both peak flow and volume. To demonstrate compliance, the applicant must provide pre- and post-development runoff rates for a range of return periods (1, 30 and 100 year), and pre- and post-development runoff volumes for the 100 year, 6 hour rainfall event. This takes account of national policy, as outlined in the SuDS Technical Standards."</i>	Detailed calculations are provided in the FRA in technical appendix H.
The applicant should note the EA's updated climate change guidance (dated 27 May 2022) when preparing the FRA / drainage strategy.	The FRA in technical appendix H has taken account of the relevant guidance.
The applicant is proposing to culvert existing ditches within the site at locations where they cross the proposed spine road and roundabout. The DRAFT FRA and Drainage Strategy also refers to off-site locations where culverting will be required to facilitate off-site highway works. The applicant will be required to submit calculations that demonstrate understanding of flows within the ditches at these locations, and therefore the required capacity of proposed culverts. The applicant will be required to submit design drawings of these culverts.	Calculations and design drawings for the culverts will be provided at the detailed engineering design stage.
The developer should provide the following information as part of future planning applications: Drainage Strategy: • Evidence that SuDS have been selected, wherever possible, to provide a wide range of benefits including amenity, biodiversity and maintaining water quality • Evidence that SuDS source control measures to manage water quantity and maintain water quality have been implemented wherever possible and throughout the management train so the development is not reliant upon large attenuation features close to the points of discharge • Existing greenfield runoff rates for the site • Post-development runoff rates in accordance with Wiltshire Council's betterment policy:	The FRA in technical appendix H includes the required elements, as appropriate. A CEMP will be prepared under condition as part of any grant of planning permission for the proposed development.

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○ <i>“With regards the control of surface water discharges from greenfield sites, Wiltshire Council requires post-development discharges to provide 30% betterment over pre-development (greenfield) discharges for all storm events between the 1-in-1 year and 1-in-100 year return period events</i> ○ <i>For greenfield development, the runoff volume from the development to any highway drain, sewer or surface water body in the 1-in-100 year, 6 hour rainfall event should never exceed the greenfield runoff volume for the same event”</i> • Evidence demonstrating how the surface water disposal hierarchy has been applied and how all other options have been exhausted. The hierarchy is set out below (as per the Sewerage Sector Guidance, paragraph C.3.12): ○ Surface water runoff is collected for use ○ Discharge into the ground via infiltration ○ Discharge to a watercourse or other surface waterbody ○ Discharge to a surface water sewer or other drainage system, discharging to a watercourse or other surface waterbody ○ Discharge to a combined sewer • The drainage strategy does not increase flood risk, as a result of catchment transfer • A detailed plan showing the existing drainage features on the site and how the proposed drainage strategy will be implemented • Surface water can be safely managed within the proposed development, up to and including a 1-in-100 year plus climate change event • Existing flood flow routes through the site have been maintained or, where they will be affected, adequate measures to intercept and safely control flows through the site have been provided to ensure flood risk is not increased elsewhere • The strategy mimics the existing drainage characteristics of the site by retaining and utilising any existing drainage features • Measures to prevent pollution of the receiving groundwater and / or surface waters • A clearly labelled drainage layout plan showing the pipe networks and any attenuation ponds. The plan should show any pipe node numbers referred to within the drainage calculations Ground Investigations: • Geotechnical factual and interpretive reports, including infiltration tests in accordance with British Research Establishment (BRE) Digest 365 – Soakaway Design • Groundwater level monitoring (taking into account seasonal variations) Detailed Drainage Calculations:	

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• Calculations and drawings for the drainage system design showing designated holding areas and conveyance routes based on no flooding on site for a 1-in-30 year plus climate change rainfall event • Calculations and drawings for the drainage system design showing designated holding areas and conveyance routes based on no flooding on site for a 1-in-100 year plus climate change rainfall event in respect to a building (including basement) or utility plant susceptible to water within the development • Calculations should include an allowance for increased surface water runoff, as a result of urban creep, in accordance with LASOO guidance • Hydraulic models should set the MADD factor / additional storage volume factor to 0 m³/ha in order to prevent an overestimation of storage capacity in the proposed drainage network • If the drainage model includes runoff from the full site (both permeable and impermeable areas), the default Cv values of 0.75 (summer) and 0.84 (winter) may be used. If runoff is only included from impermeable catchment areas within the drainage model, a Cv value of 1 must be used • If attenuation tanks are proposed that an allowance for reduced attenuation volume due to silt ingress (as per section 21.9.9 of the SuDS Manual CIRIA C753) Design Drawings: • A plan showing the cross sections and design of any attenuation pond and its components • Drawings showing conveyance routes for flows exceeding the 1-in-100 year plus climate change rainfall event that minimise the risk to people and property Third Party Consent: • Consent for any outfalls from the proposed drainage systems into a public sewer or other drainage system not owned by the applicant • Land drainage consent is required if a development proposes to discharge flow into an ordinary watercourse or carry out work within 8 m of an ordinary watercourse Ownership and Management: • Details of how the proposed and existing drainage features on the site will be maintained and managed after completion with confirmation from the relevant authority that they will adopt any systems that are being offered for adoption Construction: • Adequate measures during construction to control pollution to existing watercourses and groundwater • A construction management plan	
Informatives. The applicant is reminded of their riparian responsibilities for maintaining flows within ordinary watercourses. Guidance on riparian ownership is provided. A table is provided stipulating the information typically required at each application stage. Provision of the correct information will expedite the processing of applications by the drainage team.	Noted.

Comment	Response
Ecology	
The site is not within or immediately adjacent to any areas designated for nature conservation. Although the site consists mainly of agricultural fields, it supports some habitats of ecological value to local wildlife, contributing to habitat connectivity with the wider landscape area, providing function for commuting and foraging by a range of species, via hedgerows, trees, grass margins and the stream. Records on site and within the surrounding area include great crested newts, birds including barn owl, bats, badgers, reptiles, water vole and otter. There are also beaver records on the River Avon approximately 1.7 km to the north west of the site.	The potential effects on these habitats and species are assessed in chapter 8 of the ES and technical appendix F.
Overall, we agree with the scope of the biodiversity assessment proposed in chapter 12: Natural heritage; however, please see the comments below.	Noted.
The following surveys have been undertaken: • Habitat condition assessment • Invasive plants • Hedgerows • Great crested newts • Reptiles • Breeding birds • Hazel dormice • Bat roosts • Bat activity • Badger • Otter • Water vole The EIA scoping report sets out that a range of protected species surveys were undertaken in 2022, with some surveys being updated in 2024. The justification for not updating all surveys is that the updated extended phase 1 habitat survey undertaken in 2024 did not identify any significant changes to the types or extent of habitats on site, therefore updated surveys for hedgerows, reptiles, breeding birds, dormice and bat activity surveys were not considered necessary.	The results of these surveys are summarised in ES chapter 8 and the full survey reports are provided in technical appendix F.
With regards to bats, it is considered that update activity surveys should be undertaken due to the age of the original surveys and the mobility of bats across the landscape. Surveys should be undertaken in accordance with the BCT good practice guidelines, 2024. The ES should also consider the potential for bats foraging over open land within the site, particularly greater horseshoe bats, where this habitat is proposed to be lost.	Update habitat surveys were undertaken in 2025, which confirmed that there have been no significant changes in the habitats on site that would necessitate updating the bat surveys. Further details are provided in ES technical appendix F. The potential for effects on bats

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	as a result of habitat loss, including of foraging areas, is assessed in ES chapter 8 and technical appendix F.
A preliminary site layout has not been provided with the EIA scoping opinion information, therefore it has not been possible to determine what the potential impacts on dormice and reptiles may be. The EclA must be supported by satisfactory baseline information in order to undertake the impact assessment, therefore if significant adverse impacts are predicted or unknown, update surveys for dormice and reptiles would be required.	The update habitat survey undertaken in 2025 confirmed that there have been no significant changes in the habitats on site that would necessitate updating the dormouse and reptile surveys. Further details are provided in technical appendix F.
The stream that runs through the site is a tributary of the River Avon and records indicate there are beavers on the River Avon approximately 1.7 km to the north west of the site. The ES should consider the potential for impacts on beavers that could be using the stream.	The potential for effects on beavers is assessed in ES chapter 8 and technical appendix F.
The cumulative impacts with the wider Land South of Chippenham and East of Showell Farm allocation should be considered as part of the ES.	The cumulative effects with other developments in the area are assessed in chapter 11 of the ES.
It is noted that the EIA scoping report sets out that a biodiversity net gain assessment will be undertaken and an unlocked metric will be provided alongside the planning application.	The results of the biodiversity net gain assessment are summarised in ES chapter 8 and the full assessment is provided in technical appendix F, with the metric submitted separately.
Conservation	
The site is located to the south of Pewsham, which is located on the south eastern edge of Chippenham. The site extends to 38.9 ha and comprises seven agricultural fields, associated with Forest Farm, bound by hedgerows and trees. A stream runs through the site and along the southern boundary. The site is bound by the A4 to the east, Pewsham Road and residential properties to the north and west and by agricultural fields to the south. Forest Farm, a non-designated farm that appears to have historic origins, is located in the centre of the site but is excluded from the red line boundary.	The potential for effects on Forest Farm is discussed in chapter 6 of the ES.
From the point of view of the historic environment, the primary consideration will be the duty placed on the council under section 66 of the Planning (Listed Buildings and Conservation Areas) Act to have special regard to the desirability of preserving listed buildings and their settings.	The potential for effects on the settings of listed buildings in the vicinity of the site is assessed in ES chapter 6.
The council's core strategy Policy CP58: Ensuring the conservation of the historic environment requires that designated and non-designated heritage assets and their settings will be conserved and, where appropriate, enhanced. The council's core strategy CP57: Ensuring high quality design requires a high	The potential for effects on both designated and non-designated heritage assets is assessed in chapter 6 of the ES.

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quality of design in all new developments. The NPPF outlines government policy, including its policy in respect of the historic environment (section 16).	
The description of development contained in section 3 of the submitted scoping report advises that the proposed development will comprise up to 600 dwellings, including a proportion of affordable housing, a small local retail centre, and public open space, and that the proposals will include the first phase of a strategic link road that forms part of the wider mixed use Chippenham site allocation proposed as part of the current Wiltshire Local Plan Review. It is understood that the existing public footpaths running through the site will be retained and access to the farm will also be maintained, although it is likely to be reconfigured to link to the main access road. The site allocation, however, is currently not adopted and the local plan has yet to be examined in public. At this stage, it cannot be assumed that the allocation will necessarily come forward in its current form.	Information on the development proposals is provided in chapter 2 of the ES.
Overall, I am in agreement with the details set out in chapter 7: Cultural Heritage and the designated heritage assets that have been identified. There are no designated heritage assets located within the proposed development area itself and the key consideration will relate to setting impacts on designated assets surrounding the site, as identified. The assessment should, however, also include assessment of potential non-designated heritage assets in the area (including Forest Farm at the centre of the site) in addition to the assets already identified.	The potential for effects on both designated and non-designated heritage assets is assessed in chapter 6 of the ES.
With regard to the impacts summarised in table 7.2, I would comment that the loss of the site's historic landscape character may have been under-estimated as, in addition to its intrinsic value, this will also relate directly to the contribution that the site makes to the settings and significance of the various assets identified. I would suggest that this therefore be scoped in for assessment. Whilst the impacts on the significance of the non-designated Forest Farm (which is assumed at this stage as being a non-designated heritage asset) and Wilts & Berks Canal should be capable of mitigation via careful design and the resultant impacts, taking into account the non-designated status of the assets concerned, not 'significant' in EIA terms, these assets should also be included and scoped in for assessment within the study in due course.	The potential for effects on the site's historic landscape character, Forest Farm and the Wilts & Berks Canal is assessed in ES chapter 6.
It will also be important that the cumulative impacts with the wider Land South of Chippenham and East of Showell Farm allocation be considered as part of the ES.	The potential for cumulative cultural heritage effects with other developments in the area is assessed in chapter 11 of the ES.

Natural England

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A robust assessment of environmental impacts and opportunities based on relevant and up to date environmental information should be undertaken prior to a decision on whether to grant planning permission. Further guidance is set out in Planning Practice Guidance on Environmental Assessment, Natural Environment and Climate Change.	The EIA has been undertaken in accordance with the relevant planning practice guidance.
Schedule 4 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 sets out the information that should be included in an ES to assess impacts on the natural environment. This includes: • A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases • Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc) resulting from the operation of the proposed development • An assessment of alternatives and clear reasoning as to why the preferred option has been chosen • A description of the aspects of the environment likely to be significantly affected by the development, including biodiversity (for example fauna and flora), land, including land take, soil, water, air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), cultural heritage and landscape and the interrelationships between the above factors • A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium and long term, permanent and temporary, positive and negative effects. Effects should relate to the existence of the development, the use of natural resources (in particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment • A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment • A non-technical summary of the information • An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information Further guidance is set out in Planning Practice Guidance on Environmental Assessment and Natural Environment.	Chapter 1 of the ES includes details of where the required information listed can be found within the ES.
The ES should fully consider the implications of the whole development proposal. This should include an assessment of all supporting infrastructure. An impact assessment should identify, describe and evaluate the effects that are likely to result from the project in combination with other projects and activities that are	The proposed developments to be included in the cumulative effects assessment were agreed with Wiltshire Council through the

Comment	Response
being, have been or will be carried out. The following types of projects should be included in such an assessment (subject to available information): - Existing completed projects - Approved but uncompleted projects - Ongoing activities - Plans or projects for which an application has been made and that are under consideration by the consenting authorities - Plans and projects that are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects	scoping process and details are provided in chapter 3 of the ES. The assessments of cumulative effects are provided in chapter 11. It should be noted that the 2017 EIA Regulations only require consideration of cumulative effects with existing or approved projects.
Natural England is required to make available information it holds where requested to do so. National datasets held by Natural England are available at http://www.naturalengland.org.uk/publications/data/default.aspx.	Noted.
Detailed information on the natural environment is available at www.magic.gov.uk.	Noted.
Natural England's SSSI impact risk zones are a GIS dataset that can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal.	Noted.
Natural England does not hold local information on local sites, local landscape character, priority habitats and species or protected species. Local environmental data should be obtained from the appropriate local bodies. This may include the local environmental records centre, the local wildlife trust, local geo-conservation group or other recording society.	As set out in ES chapter 8 and technical appendix F, information was sought from relevant organisations, including Wiltshire and Swindon Biological Records Centre.
The NPPF (paragraphs 192-196) sets out how to take account of biodiversity and geodiversity interests in planning decisions. Further guidance is set out in Planning Practice Guidance on the Natural Environment.	The assessment in ES chapter 8 and technical appendix F has been undertaken in accordance with the NPPF and planning practice guidance.
The potential impact of the proposal upon sites and features of nature conservation interest and opportunities for nature recovery and biodiversity net gain should be included in the assessment.	The assessment in ES chapter 8 and technical appendix F includes the requested elements.
Ecological impact assessment (EclA) is the process of identifying, quantifying and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. Guidelines have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).	The assessment of ecological effects in ES chapter 8 and technical appendix F has been undertaken in accordance with CIEEM's guidelines.

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Local planning authorities have a duty to conserve and enhance biodiversity as part of their decision making. Conserving biodiversity can include habitat restoration or enhancement. Further information is available.	Noted.
The proposal is unlikely to adversely impact any European or internationally designated nature conservation sites (including 'habitats sites' under the NPPF) or nationally designated sites (sites of special scientific interest, national nature reserves or marine conservation zones).	Noted.
The ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. Local sites are identified by the local wildlife trust, geoconservation group or other local group and protected under the NPPF (paragraphs 192 and 193). The ES should set out proposals for mitigation of any impacts and, if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks. Contact the relevant local body for further information.	The potential for effects on locally designated sites within 2 km of the site is assessed in chapter 8 of the ES and technical appendix F.
The conservation of species protected under the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017 is explained in Part IV and Annex A of government Circular 06/2005 <i>Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System</i> .	Noted.
The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological records centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area.	Surveys have been undertaken for a range of protected species to inform the ecological assessment. The findings are summarised in ES chapter 8 and the full survey results are included in technical appendix F. Records were also sought from relevant organisations.
The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed consultants.	The ecological assessment in ES chapter 8 and technical appendix F includes the required elements. Full details of survey timings, which were carried out by appropriately qualified surveyors, are provided in technical appendix F.
Natural England has adopted standing advice for protected species, which includes guidance on survey and mitigation measures. A separate protected species licence from Natural England or Defra may also be required.	Noted.
District level licensing (DLL) is a type of strategic mitigation licence for great crested newts (GCN) granted in certain areas at a local authority or wider scale. A DLL scheme for GCN may be in place at the location of the development site. If a DLL scheme is in place, developers can make a financial contribution to	As set out in ES chapter 8 and technical appendix F, the proposed development has been registered with the DLL.

Comment	Response
strategic, off-site habitat compensation instead of applying for a separate licence or carrying out individual detailed surveys. By demonstrating that DLL will be used, impacts on GCN can be scoped out of detailed assessment in the ES.	
Priority habitats and species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as SSSIs, on the Magic website, or as local wildlife sites. Lists of priority habitats and species are available. Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.	The ecological assessment in ES chapter 8 and technical appendix F includes effects on species and habitats of principal importance.
Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to download. Further information is also available.	The site is greenfield.
An appropriate level habitat survey should be carried out on the site to identify any important habitats present. In addition, ornithological, botanical and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present.	Habitat and bird surveys have been undertaken on the site. Invertebrate surveys were not required. The findings are summarised in ES chapter 8 and the full survey results are included in technical appendix F.
The ES should include details of: - Any historical data for the site affected by the proposal (e.g. from previous surveys) - Additional surveys carried out as part of this proposal - The habitats and species present - The status of these habitats and species (e.g. whether priority species or habitat) - The direct and indirect effects of the development upon those habitats and species - Full details of any mitigation or compensation measures - Opportunities for biodiversity net gain or other environmental enhancement	The ecological assessment in ES chapter 8 and technical appendix F includes the required information.
The ES should assess the impacts of the proposal on any ancient woodland, ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement. Natural England maintains the Ancient Woodland Inventory, which can help identify ancient woodland. The wood pasture and parkland inventory sets out information on wood pasture and parkland. The ancient tree inventory provides information on the location of ancient and veteran trees. Natural England and the Forestry Commission have prepared standing advice on ancient woodland, ancient and veteran trees.	There is no ancient woodland, wood pasture, parkland or ancient and veteran trees on the site.
Paragraph 193 of the NPPF states that decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing	Noted.

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coherent ecological networks that are more resilient to current and future pressures. Biodiversity net gain is additional to statutory requirements relating to designated nature conservation sites and protected species.	
Proposals for mandatory biodiversity net gain should be in line with the Environment Act 2021 and supporting regulations. Further information on biodiversity net gain, including draft planning practice guidance, is available. The statutory biodiversity metric, together with ecological advice, should be used to calculate the change in biodiversity resulting from the proposed development and demonstrate how proposals can achieve a net gain. The metric should be used to: • Assess or audit the biodiversity unit value of land within the application area • Calculate the losses and gains in biodiversity unit value resulting from proposed development • Demonstrate that the required percentage biodiversity net gain will be achieved	A biodiversity net gain assessment has been undertaken using the statutory biodiversity metric. Its findings are summarised in ES chapter 8 and the full results are provided in technical appendix F.
Biodiversity net gain outcomes can be achieved on site, off site or through a combination of both. On-site provision should be considered first. Delivery should create or enhance habitats of equal or higher value. When delivering net gain, opportunities should be sought to link delivery to relevant plans or strategies, e.g. green infrastructure strategies or local nature recovery strategies.	As set out in the biodiversity net gain assessment in technical appendix F, net gain has been achieved on site.
Opportunities for wider environmental gains should also be considered.	Chapter 2 of the ES includes information on measures to reduce greenhouse gas emissions, adapt to climate change, reduce flood risk and improve water quality.
The environmental assessment should refer to the relevant national character areas. Character area profiles set out descriptions of each landscape area and statements of environmental opportunity.	The landscape and visual assessment in ES chapter 7 and technical appendix E includes consideration of national character areas.
The ES should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies. We encourage the use of landscape character assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Management and Assessment in 2013. LCA provides a sound basis for guiding, informing and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.	The landscape and visual assessment in ES chapter 7 and technical appendix E includes the potential for effects on local landscape character areas.
A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology set out in <i>Guidelines for Landscape and Visual Impact Assessment 2013</i> (3 rd edition) produced by the Landscape Institute and the Institute of Environmental Management and Assessment. For national parks and AONBs, we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics that underpin the natural beauty of the area and its designation status.	The landscape and visual assessment in ES chapter 7 and technical appendix E has been undertaken in accordance with these guidelines. There are no national parks or national landscapes (formerly known as AONBs) in the study area.

Comment	Response
The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping stage.	The assessment of cumulative effects in ES chapter 11 and technical appendix E includes the potential for cumulative effects with other developments in the area, details of which are set out in ES chapter 3. It should be noted that the 2017 EIA Regulations only require consideration of cumulative effects with existing or approved projects.
To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides, as well as guidance in the National Design Guide and National Model Design Code. The ES should set out the measures to be taken to ensure the development will deliver high standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.	Detailed design information is not available at this outline application stage. However, general design information, details of green infrastructure and information on alternatives are provided in ES chapter 2. More detail is available in the design and access statement submitted in support of the planning application.
The ES should include an assessment of the impacts on any land in the area affected by the development that qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific or historic interest. An up-to-date list is available at www.hmrc.gov.uk/heritage/lbsearch.htm .	There is no such land within the site itself. The potential for effects on Bowood House, which is on the list, is assessed in ES chapter 6.
The ES should consider potential impacts on access land, common land, public rights of way and, where appropriate, the England Coast Path and coastal access routes and coastal margin in the vicinity of the development, in line with NPPF paragraph 105. It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.	Information on the proposed green infrastructure, footpaths and cycleways is provided in chapter 2 of the ES. There are no coastal access routes, access land or common land in the study areas used in the EIA. The potential for effects on views from public rights of way is assessed in ES chapter 7 and technical appendix E.
Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways and bridleways. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green	Information on the proposed green infrastructure, footpaths and cycleways is provided in chapter 2 of the ES.

Comment	Response
infrastructure. Access to nature within the development site should also be considered, including the role that natural links have in connecting habitats and providing potential pathways for movements of species.	
Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.	Noted.
Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil resources are protected and sustainably managed. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered in line with paragraphs 187 and 188 of the NPPF. Further guidance is set out in the Natural England <i>Guide to assessing development proposals on agricultural land</i> .	There is only a relatively small area (c7.7 ha) of grade 3a BMV land on site and agricultural land and soils were scoped out of the EIA. However, a stand alone agricultural land classification report has been submitted in support of the planning application.
As set out in paragraph 223 of the NPPF, new sites or extensions to sites for peat extraction should not be granted planning permission.	No peat extraction is proposed.
The following issues should be considered and, where appropriate, included as part of the ES: • The degree to which soils would be disturbed or damaged as part of the development • The extent to which agricultural land would be disturbed or lost as part of this development, including whether any BMV agricultural land would be impacted. This may require a detailed agricultural land classification (ALC) survey if one is not already available. For information on the availability of existing ALC information see www.magic.gov.uk • Where an ALC and soil survey of the land is required, this should normally be at a detailed level, e.g. one auger boring per hectare (or more detailed for a small site), supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 m. The survey data can inform suitable soil handling methods and appropriate re-use of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space) • The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design / master plan • The ES should set out details of how any adverse impacts on soils can be avoided or minimised and demonstrate how soils will be sustainably used and managed, including consideration in site design and master planning, and areas for green infrastructure or biodiversity net gain. The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise off site impacts	Agricultural land and soils were scoped out of the EIA. However, a stand alone agricultural land classification report has been submitted in support of the planning application.

Comment	Response
Further information is available in the <i>Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites</i> and The British Society of Soil Science Guidance Note <i>Benefitting from Soil Management in Development and Construction</i> .	Noted.
Air quality in the UK has improved over recent decades but air pollution remains a significant issue. For example, approximately 85% of protected nature conservation sites are currently in exceedance of nitrogen levels where harm is expected (critical load) and approximately 87% of sites exceed the level of ammonia where harm is expected for lower plants (critical level of 1 µg) (Report: <i>Trends Report 2020: Trends in critical load and critical level exceedances in the UK</i> – Defra, UK). A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The government's Clean Air Strategy also has a number of targets to reduce emissions, including to reduce damaging deposition of reactive forms of nitrogen by 17% over England's protected priority sensitive habitats by 2030, to reduce emissions of ammonia against the 2005 baseline by 16% by 2030 and to reduce emissions of NO _x and SO ₂ against a 2005 baseline of 73% and 88% respectively by 2030. Shared Nitrogen Action Plans (SNAPs) have been identified as a tool to reduce environmental damage from air pollution.	There are no designated sites vulnerable to potential effects from traffic emissions within 200 m of roads that will be affected by an increase in annual average daily traffic flows associated with the proposed development of more than 1,000 vehicles. A detailed assessment of air quality effects on designated sites was therefore not required.
The planning system plays a key role in determining the location of developments that may give rise to pollution, either directly or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The ES should take account of the risks of air pollution and how these can be managed or reduced. This should include taking account of any strategic solutions or SNAPs that may be being developed or implemented to mitigate the impacts on air quality. Further information on air pollution impacts and the sensitivity of different habitats / designated sites can be found on the Air Pollution Information System (www.apis.ac.uk).	There are no designated sites vulnerable to potential effects from traffic emissions within 200 m of roads that will be affected by an increase in annual average daily traffic flows associated with the proposed development of more than 1,000 vehicles. A detailed assessment of air quality effects on designated sites was therefore not required.
Information on air pollution modelling, screening and assessment can be found on the following websites: • SCAIL Combustion and SCAIL Agriculture – http://www.scail.ceh.ac.uk/ • Ammonia assessment for agricultural development – https://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit • Environment Agency Screening Tool for industrial emissions – https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit • Defra Local Air Quality Management Area Tool (Industrial Emission Screening Tool) – England – http://www.airqualityengland.co.uk/lagm	Noted.
The planning system plays a key role in determining the location of developments that may give rise to water pollution, and hence planning decisions can have a significant impact on water quality and land. The assessment should take account of the risks of water pollution and how these can be managed or reduced. A number of water-dependent protected nature conservation sites have been identified as failing condition	The potential for effects on the Bristol Avon River Local Wildlife Site as a result of water pollution is assessed in ES chapter 8 and technical appendix F.

Comment	Response
due to elevated nutrient levels and nutrient neutrality is consequently required to enable development to proceed without causing further damage to these sites. The ES needs to take account of any strategic solutions for nutrient neutrality or Diffuse Water Pollution Plans that may be being developed or implemented to mitigate and address the impacts of elevated nutrient levels. Further information can be obtained from the local planning authority.	
The ES should identify how the development affects the ability of the natural environment (including habitats, species and natural processes) to adapt to climate change, including its ability to provide adaptation for people. This should include impacts on the vulnerability or resilience of a natural feature (i.e. what is already there and affected) as well as impacts on how the environment can accommodate change for both nature and people, for example whether the development affects species' ability to move and adapt. Nature-based solutions, such as providing green infrastructure on site and in the surrounding area (e.g. to adapt to flooding, drought and heatwave effects), habitat creation and peatland restoration, should be considered. The ES should set out the measures that will be adopted to address impacts.	As set out in ES chapter 8 and technical appendix F, the proposed green infrastructure and habitat management will ensure that there will be no significant effects on habitats and species on site, indicating that there will be no significant effects on their ability to adapt to climate change.
Further information is available from the Committee on Climate Change's (CCC) Independent Assessment of UK Climate Risk, the National Adaptation Programme (NAP), the Climate Change Impact Report Cards (biodiversity, infrastructure, water etc) and the UKCP18 climate projections.	Noted.
The Natural England and RSPB <i>Climate Change Adaptation Manual</i> (2020) provides extensive information on climate change impacts and adaptation for the natural environment and adaptation focused nature-based solutions for people. It includes the Landscape Scale Climate Change Assessment Method, which can help assess impacts and vulnerabilities on natural environment features and identify adaptation actions. Natural England's <i>Nature Networks Evidence Handbook</i> (2020) also provides extensive information on planning and delivering nature networks for people and biodiversity.	Noted.
The ES should also identify how the development impacts the natural environment's ability to store and sequester greenhouse gases, in relation to climate change mitigation and the natural environment's contribution to achieving net zero by 2050. Natural England's <i>Carbon Storage and Sequestration by Habitat report</i> (2021) and the British Ecological Society's <i>Nature-based solutions report</i> (2021) provide further information.	ES chapter 2 includes details of habitat loss and creation. The existing habitats that store and sequester the greatest quantities of greenhouse gases (including trees and hedgerows) will largely be retained and replacement and new areas of planting will be provided.
The ES should consider the contribution the development could make to relevant local environmental initiatives and priorities to enhance the environmental quality of the development and deliver wider environmental gains. This should include considering proposals set out in relevant local strategies or supplementary planning documents, including landscape strategies, green infrastructure strategies, tree and woodland strategies, biodiversity strategies or biodiversity opportunity areas.	ES chapter 8 and technical appendix F include information on proposed mitigation and enhancement measures that accord with local strategies and initiatives.

Environment Agency

Comment	Response
Irrespective of your decision on the need for an EIA, the following areas are considered necessary to include within the planning submission: • Water supply (resources) and water efficiency • Wastewater (foul drainage) • Groundwater protection (from pollution) • Impact on protected species and habitat • Construction environmental management plan, including pollution prevention measures • Waste management	Noted. Please see detailed responses below to each of these points.
Water supply and wastewater. Adequate water and wastewater infrastructure is needed to support sustainable development. NPPF identifies that a healthy water environment will also deliver multiple benefits, such as helping to enhance the natural environment generally and adapting to climate change.	Noted. Information on the proposed wastewater treatment and water supply arrangements is provided in chapter 2 of the ES.
The NPPF planning practice guidance states that when drawing up wastewater treatment proposals for any development, the first presumption is to provide a system of foul drainage discharging into a public sewer to be treated at a public sewage treatment works (those provided and operated by the water and sewerage companies). This should be done in consultation with the sewerage company of the area.	It is proposed that wastewater from the development will discharge into the existing foul sewer network, as set out in ES chapter 2.
Where a connection to a public foul sewer is not feasible (in terms of cost and / or practicality) a package sewage treatment plant can be considered. The package sewage treatment plant should offer treatment so that the final discharge from it meets the standards set by the required Environment Agency environmental permit. A proposal for a package sewage treatment plant and infrastructure should set out clearly the responsibility and means of operation and management to ensure that the permit is not likely to be infringed during the life of the plant.	A package sewage treatment plant will not be required for the proposed development.
Sustainable construction. Sustainable design and construction should be implemented across the proposed development. This is important in limiting the effects of and adapting to climate change. Running costs for occupants can also be significantly reduced.	Information on sustainable design and construction is provided in the energy and sustainability statement submitted in support of the planning application.
Biodiversity. The NPPF is clear that pursuing sustainable development includes moving from a net loss of biodiversity to achieving net gains for nature and that a core principle for planning is that it should contribute to conserving and enhancing the natural environment and reducing pollution. Information on biodiversity impacts and opportunities should inform all stages of development including, for instance, site selection and design, including any pre-application consultation as well as the application itself.	Noted. As set out in ES chapter 8 and technical appendix F, the proposed development will achieve over 10% biodiversity net gain on site.

Comment	Response
Groundwater protection / contaminated land. If historic use of the site may have caused contamination, then NPPF paragraph 109 states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to, or being put at risk from, unacceptable levels of water pollution. Government policy also states that planning policies and decisions should ensure that adequate site investigation information, prepared by a competent person, is presented. Further guidance on what should be contained in the assessment and issues associated with groundwater protection are available.	Information on the potential for contamination is provided in the phase 1 geoenvironmental report submitted in support of the planning application.
Pollution prevention during construction. Safeguards should be implemented during the construction phase to minimise the risks of pollution from the development. Such safeguards should cover: • The use of plant and machinery • Silt management • Oils / chemicals and materials • Wheel washing and dirty water disposal • The use and routing of plant and vehicles • The location and form of work and storage areas and compounds • The control and removal of spoil and wastes	Outline information on pollution prevention during construction is provided in chapter 2 of the ES. A CEMP will be prepared under condition as part of any grant of planning permission for the proposed development.
Waste. Should this proposal be granted planning permission then, in accordance with the waste hierarchy, we wish the applicant to consider reduction, re-use and recovery of waste in preference to off-site incineration and disposal to landfill during site construction.	Information on waste management is provided in the waste audit submitted in support of the planning application.

Historic England

Comment	Response
This development could, potentially, have an impact upon a number of designated heritage assets and their settings in the area around the site. In line with the advice in the NPPF, we would expect the ES to contain a thorough assessment of the likely effects that the proposed development might have upon those elements that contribute to the significance of these assets.	The potential effects on designated heritage assets are assessed in chapter 6 of the ES.
Our initial assessment shows that the proposed development could have a potential impact on the setting of the grade I listed Bowood Registered Park and Garden, as noted in the Wiltshire Local Plan, September 2023. Bowood Registered Park and Garden contains an extensive and complex pleasure grounds and park, the main phases of which were developed between the 18 th and 19 th centuries and include work by Lancelot Brown, Robert Adam, Charles Hamilton, Josiah Lane, Robert Smirke, Charles Barry, John	The potential for effects on Bowood Registered Park and Garden is assessed in ES chapter 6.

Comment	Response
Spencer and George Kennedy. The site lies to the south of the A4 road between Chippenham and Calne, with the main drive into the site starting at the Golden Gates at Derry Hill to the north west.	
We would also expect the ES to consider the potential impacts on non-designated features of historic, architectural, archaeological or artistic interest, since these can also be of national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place. This information is available via the local authority Historic Environment Record (www.heritagegateway.org.uk) and relevant local authority staff.	The potential effects on non-designated heritage assets are assessed in chapter 6 of the ES.
We would strongly recommend that you involve the conservation officer of Wiltshire Council and the archaeological staff at Wiltshire and Swindon Historic Environment Record (HER) in the development of this assessment. They are best placed to advise on: local historic environment issues and priorities; how the proposal can be tailored to avoid and minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.	Wiltshire Council's conservation officer was consulted during the scoping process – please see above table. The HER was consulted during the heritage desk-based assessment and a full gazetteer of heritage assets in the study area is provided in technical appendix D.
It is important that the assessment is designed to ensure that all impacts are fully understood. Section drawings and techniques such as photomontages are a useful part of this.	The outline nature of the application means that photomontages have not been used to inform the assessment. The cultural heritage assessment in ES chapter 6 was informed by the landscape and visual effects assessment (ES chapter 7 and technical appendix E), including the zone of theoretical visibility modelling.
The assessment should also take account of the potential impact that associated activities (such as construction, servicing and maintenance, and associated traffic) might have upon perceptions, understanding and appreciation of the heritage assets in the area. The assessment should also consider, where appropriate, the likelihood of alterations to drainage patterns that might lead to in situ decomposition or destruction of below ground archaeological remains and deposits, and can also lead to subsidence of buildings and monuments.	The assessment of cultural heritage effects in ES chapter 6 includes consideration of effects during construction and from increased traffic.

Active Travel England

Comment	Response
Active Travel England (ATE) does not currently provide detailed advice at pre-application stage. However, we have produced a standing advice note that summarises some of the key active travel criteria that ATE will assess when consulted on a formal application. Our standing advice can be found here: https://www.gov.uk/government/publications/active-travel-england-sustainable-development-advice-notes .	Noted. The TA in technical appendix G includes a review of the site and development proposals against ATE's planning application checklist and toolkit.

Sport England

Comment	Response
The proposed development does not fall within either our statutory remit (Statutory Instrument 2015/595), or non-statutory remit (National Planning Practice Guidance paragraph 003 ref. ID: 37-003-20140306) and, therefore, Sport England has not provided a detailed response in this case, but would wish to give the following advice to aid the assessment of this application. General guidance and advice can, however, be found on our website: https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications .	Noted.
If the proposal involves the loss of any sports facility, then full consideration should be given to whether the proposal meets paragraph 140 of the NPPF, is in accordance with local policies to protect social infrastructure and meets any approved Playing Pitch Strategy or Built Sports Facility Strategy that the local authority has in place.	The proposed development does not involve the loss of any sports facilities.
If the proposal involves the provision of a new sports facility, then consideration should be given to the recommendations and priorities set out in any approved Playing Pitch Strategy or Built Sports Facility Strategy that the local authority may have in place. In addition, to ensure they are fit for purpose, such facilities should be designed in accordance with Sport England, or the relevant National Governing Body, design guidance notes: http://sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/ .	Noted.
If the proposal involves the provision of additional housing, then it will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then new and / or improved sports facilities should be secured and delivered in accordance with any approved local policy for social infrastructure, and priorities set out in any Playing Pitch Strategy or Built Sports Facility Strategy that the local authority has in place.	The potential for effects on community facilities, including sports facilities, is assessed in chapter 5 of the ES.
In line with the government's NPPF (including section 8) and PPG (Health and wellbeing section), consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active	Noted.

Comment	Response
Design guidance can be used to help with this when developing or assessing a proposal. Active Design provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. NPPF section 8: https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities. PPG Health and wellbeing section: https://www.gov.uk/guidance/health-and-wellbeing. Sport England's Active Design Guidance: https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design.	

Appendix 1 – Scoping report

Forest Farm, Chippenham
EIA scoping report

Gleeson Land
March 2025

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Issue / revision	FINAL	Prepared by	Lauren Tinker
Reference	227610		
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☐ Information	☐ Approval	Checked by	Emma Robinson
☐ Comment	☒ Submission		
Comments		Date	March 2025
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		Date	March 2025
		Please return by	

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Figure 2: Designations plan

Figure 3: The scoping matrix

Figure 4: Proposed trench area and previously excavated trench areas

Figure 5: Representative viewpoints

Figure 6: Developments to be considered in the cumulative effects assessment

1 Introduction

Background

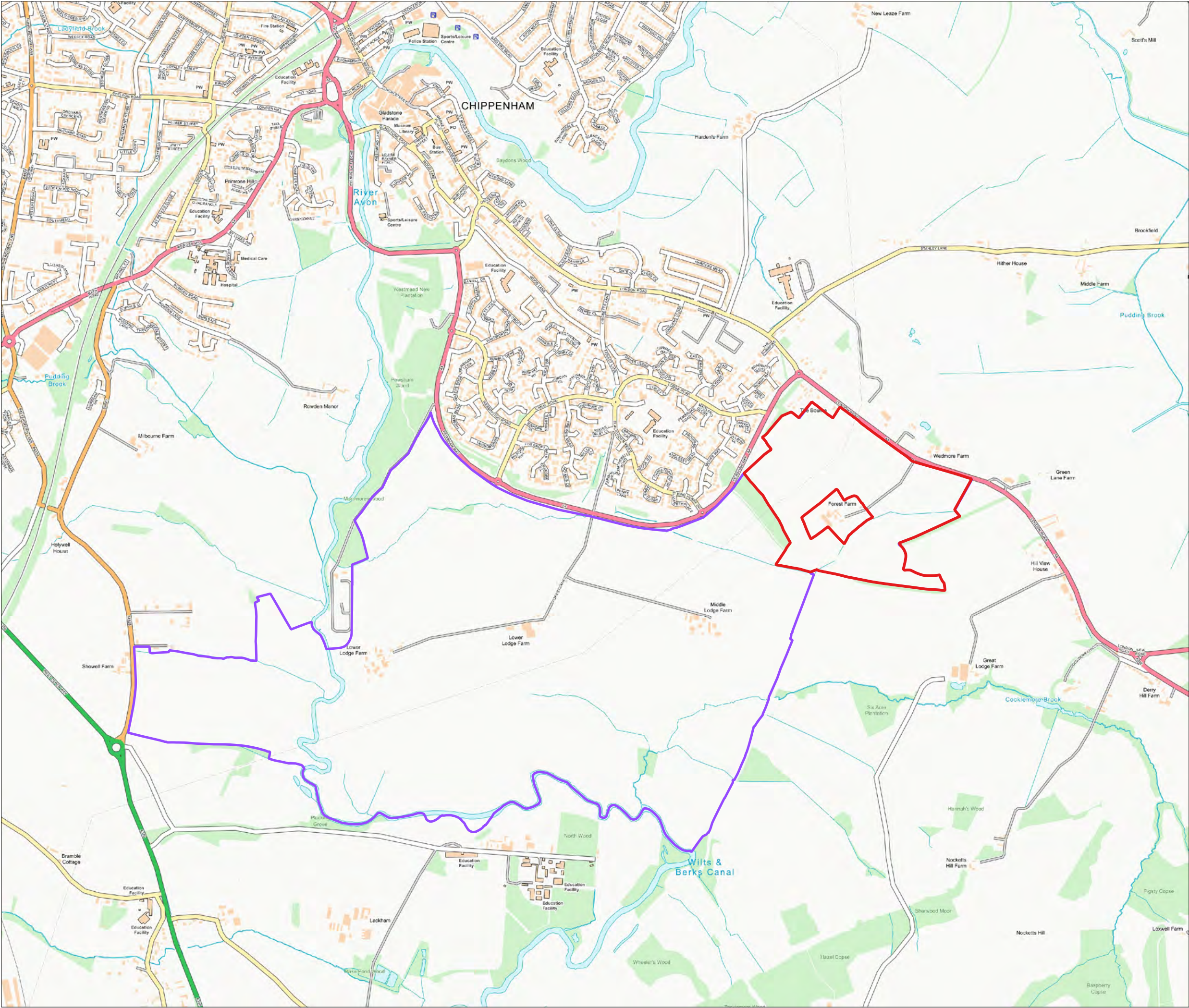
- 1.1 Policy 7 of Wiltshire Council's (2023) *Wiltshire Local Plan Pre-Submission draft 2020-2038 (Regulation 19)* identifies the 347 ha Land South of Chippenham and East of Showell Farm site for the development of residential dwellings, employment land, a district and local centre, land safeguarded for a 10-form entry secondary school, two sites for two-form entry primary schools incorporating 60-place nurseries, and two sites to accommodate additional 80-place nurseries, together with a new road corridor from the A4 to the A350, an extension to the River Avon Country Park, and a range of public open space.
- 1.2 Gleeson Land intends to submit a planning application to Wiltshire Council for up to 600 dwellings, a small local retail centre, public open space and the first phase of the road corridor on the north eastern part of the allocated site (figure 1).

Purpose of the scoping report

- 1.3 The proposed development falls within schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended; hereafter the EIA Regulations) and the location, scale and nature of the development proposals, together with the potential for cumulative effects with the wider allocation, mean that there is the potential for significant effects on the environment. The proposed development is therefore considered to be an environmental impact assessment (EIA) development, as defined by the EIA Regulations, and the planning application will be accompanied by an environmental statement (ES) prepared in accordance with these regulations. Gleeson Land therefore submits this report as a formal request to Wiltshire Council for an EIA scoping opinion under the EIA Regulations.
- 1.4 This report presents information to assist the council in the process of scoping the EIA and outlines the potentially significant effects that the EIA would need to examine and the preliminary scope of information that would need to be provided in the ES.

Report structure

- 1.5 This report is broadly structured as follows:
 - Site description (chapter 2)
 - Proposed development (chapter 3)
 - An overview of the scoping process (chapter 4)
 - The results of Gleeson Land's scoping exercise (chapters 5 to 17)
 - Conclusion with Gleeson Land's view as to the information to be provided in the ES and its proposed structure (chapter 18)



- Site boundary
- Land South of Chippenham and East of Showell Farm remaining allocation

Notes/Revision

Forest Farm, Chippenham

Gleeson Land

0 0.25 0.5 km

North arrow

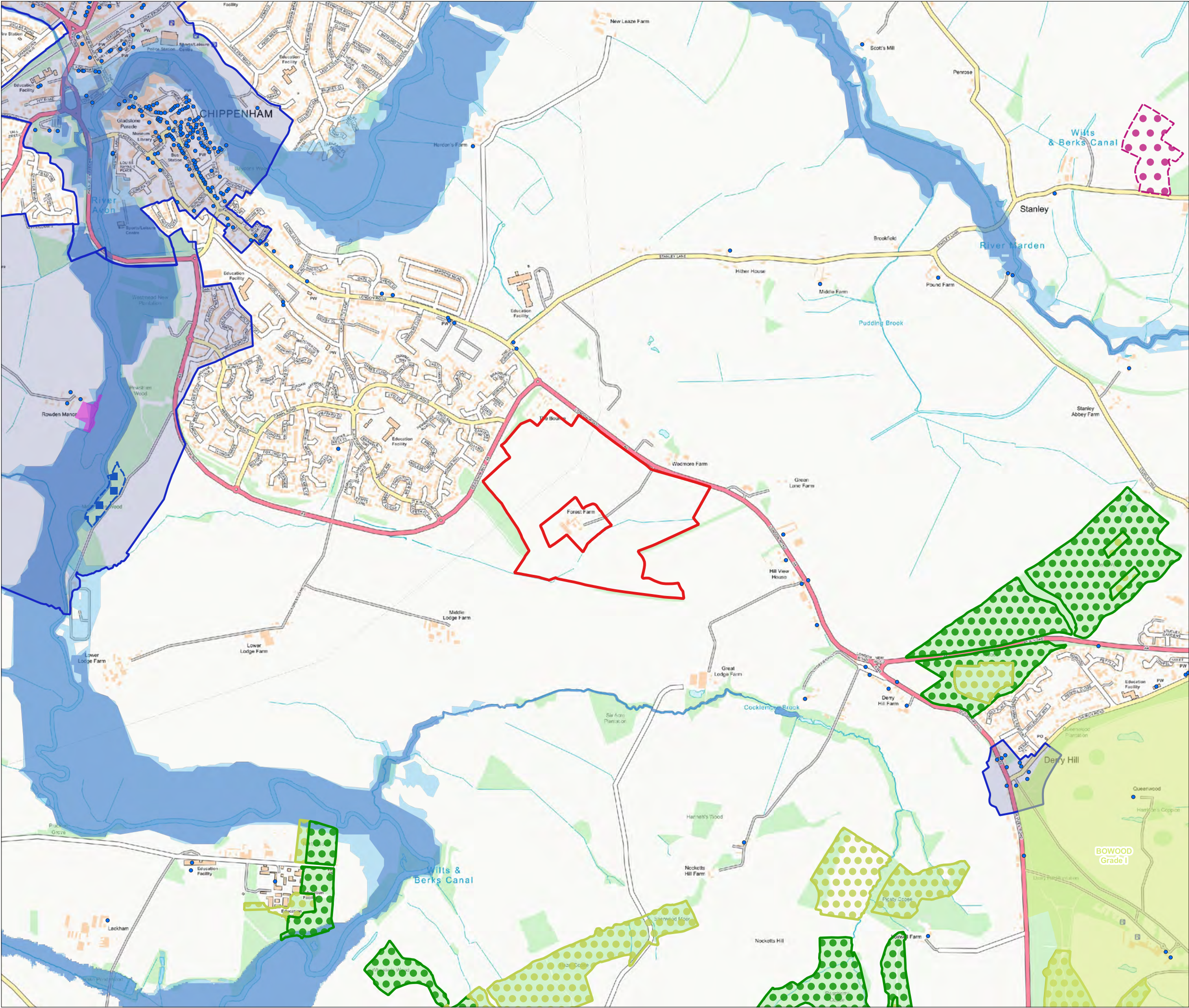
Figure 1: Site location

Status:	Drawn by: JC	Checked by: LT
Project number: 227610	Scale @A3: 1:15,000	Date created: 2024/10/10
Drawing number: TOR-C001	Revision: -	

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2 Site description

- 2.1 The 38.9 ha site lies on the south eastern edge of Chippenham (figure 1), to the south west of the A4 London Road, and comprises seven grassland fields associated with Forest Farm. The farm buildings centrally located on the site are excluded from the planning application boundary. An access track to the farm buildings runs across the site from the A4 London Road. Hedgerows run along the site boundaries and between the fields. A small watercourse and several ditches run alongside the hedgerows. The site slopes gently from approximately 65 m above Ordnance datum (AOD) in the north to around 55 m AOD in the south.
- 2.2 A line of overhead electricity pylons crosses the north of the site from north east to south west. Public footpath CHIP16 runs through the west of the site and connects to public footpath CALW83 in the south, linking Pewsham to the north with the disused Pewsham Locks and wider countryside to the south. A below ground fuel pipeline and rising sewer main cross the northern part of the site from north west to north east.
- 2.3 The site is bordered to the north by several dwellings and to the north east by the A4 London Road, beyond which lie Wedmore Farm, Stanley Park sports ground and more fields. An area of grassland and trees lies to the north west of the site, beyond which are the A4 Pewsham Way and the residential area of Pewsham. An area of woodland lies to the west of the site, while to the south and south east there are more fields.
- 2.4 There are no environmental or cultural heritage designations on the site (figure 2). There are several grade II listed buildings in the vicinity, the nearest of which are Gate Farmhouse and a milestone, approximately 260 m to the north west, Forest Gate Farmhouse and Barn, approximately 325 m to the south east, and Hill View, approximately 410 m to the south east.



- Listed Buildings
- Conservation Area
- Local Nature Reserves
- Registered parks and gardens
- Scheduled monuments
- Sites of Special Scientific Interest
- Ancient & Semi-Natural Woodland
- Ancient Replanted Woodland
- Flood Zone 2
- Flood Zone 3

Notes/Revision

Forest Farm, Chippenham
Gleeson Land



Figure 2: Designations

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Drawing number: TOR-C002	Revision: -	

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3 Proposed development

- 3.1 The proposed development will comprise up to 600 dwellings, including a proportion of affordable housing, a small local retail centre, and public open space. The proposals will include the first phase of the strategic link road in detail that forms part of the wider allocation, including a new site access roundabout on the A4. Pedestrian and cycle links will be created through the site. The existing public footpaths running through the site will be retained and access to the farm will also be maintained, although it is likely to be reconfigured to link to the main access road.
- 3.2 The existing hedgerows and trees on the site will be retained where practical and new areas of informal public open space will be created, including children's play areas. Appropriate easements will be retained for the fuel pipeline and the overhead power lines. Sustainable drainage systems, including attenuation basins and swales, will be used to manage surface water runoff.
- 3.3 Measures will be identified in an energy and sustainability statement to ensure that the proposed dwellings are low carbon in operation and that the proposed development can adapt to climate change. These will include designing and implementing site-wide energy infrastructure (including building-integrated renewable and low carbon generation, envisaged to be in the form of solar photovoltaics and air-source heat pumps or a centralised ground- / air-source heat pump energy hub with heat network) and no gas supply to the site, ensuring that climate adaptation principles are integrated into the design of the external environment and specification / design of buildings, and the provision of electric vehicle charging points, secure cycle storage and new pedestrian and cycle links.
- 3.4 The potential for cumulative effects with the wider Land South of Chippenham and East of Showell Farm allocation will need to be considered in the EIA (see section 17 for further details).

4 Scoping the environmental impact assessment

Background

- 4.1 The EIA process examines the significant effects of an EIA development on its receiving environment. This is encapsulated in the advice given in paragraph 035 (reference ID 4-035-20170728) of the Ministry of Housing, Communities and Local Government's (MHCLG) web-based National Planning Practice Guidance: *Environmental Impact Assessment* (NPPG; updated 2020):

"Whilst every Environmental Statement should provide a full factual description of the development, the emphasis should be on the 'main' or 'significant' environmental effects to which a development is likely to give rise. The Environmental Statement should be proportionate and not be any longer than is necessary to assess properly those effects. Where, for example, only one environmental factor is likely to be significantly affected, the assessment should focus on that issue only. Impacts which have little or no significance for the particular development in question will need only very brief treatment to indicate that their possible relevance has been considered."

- 4.2 This approach is reinforced by case law from UK and European courts. Judgements have stated that, even in relation to the minimum requirements for an ES, not every possible effect has to be considered. The focus should be on the main effects and remedying the significant adverse effects. The Milne judgement (R v Rochdale MBC ex parte Milne) states that *"the environmental statement does not have to describe every environmental effect, however minor, but only the main effects or likely significant effects."* The Tew judgement (R v Rochdale MBC ex parte Tew) noted that the underlying objective of EIA is that decisions be taken *"in full knowledge"* of a project's likely significant effects and stated:

"that is not to suggest that full knowledge requires an environmental statement to contain every conceivable scrap of environmental information about a particular project. The directive and the Assessment Regulations require the likely significant effects to be assessed. It will be for the local planning authority to decide whether a particular effect is significant."

- 4.3 A comprehensive and focused scoping process, culminating in a constructive scoping opinion that identifies the likely significant effects and any EIA methodologies that Wiltshire Council wishes to see employed, will enable the production of an ES that provides a concise and objective analysis that deals with the significant areas of impact and highlights the key issues relevant to the decision-making process.
- 4.4 The aim is to 'scope in' only those aspects considered likely to have significant environmental effects. Where a particular environmental feature or component of it has not been included within the proposed scope of the EIA, this is not to suggest that there will be no associated effects; rather that these are not considered to be among the significant effects. In line with the guidance given in the NPPG, these effects will be given *"very brief treatment [within the scoping report] to indicate that their possible relevance has been considered"*, but no detailed assessment work is proposed for them.

The scoping process undertaken

- 4.5 Baseline data on the site and surrounding area have been gathered for each environmental topic. A checklist has then been used to identify which environmental issues have the potential to be subjected to effects arising from the proposed development, which has been presented as the first table in each topic section. The checklist is based on the features of the environment referred to in the EIA Regulations, the European Commission's (2017) *Environmental Impact Assessment of Projects: Guidance on Scoping* and the Institute of Environmental Management and Assessment's (IEMA; 2004) *Guidelines for environmental impact assessment*. Where no potential for a significant effect has been identified in the checklist, the issue has not been considered further in the scoping exercise.
- 4.6 To determine whether the identified potential effects are likely to be significant, the relative importance of the potential receptors (classified as high, medium, low or negligible) was combined with the magnitude of the envisaged changes (classified as large, medium, small or negligible) to which they would be subjected, using the matrix in figure 3 below. The findings of this process form the second table in each topic section.
- 4.7 The main body of the report focuses on the potential for the Forest Farm development alone to lead to significant effects on the environment, while the potential for cumulative effects with the wider Land South of Chippenham and East of Showell Farm allocation is discussed in section 17.

		Importance / sensitivity of receptor				Key
		High	Medium	Low	Negligible	
Predicted scale or magnitude of effect	Large					Likely to be significant – scope into EIA
	Medium					Possibly significant – scope into EIA
	Small					Not significant – scope out of EIA
	Negligible					

Figure 3: The scoping matrix

5 Air quality and climate

Introduction

- 5.1 New development can affect air quality and climate by generating dust during site preparation and construction, increasing emissions to air from traffic, and increasing carbon dioxide (CO₂) emissions during and post-construction. There is also the potential for new developments to be vulnerable to risks associated with climate change.

Currently known baseline

- 5.2 Wiltshire Council has three diffusion tube monitoring points in Chippenham to the north west of the site on Bath Road (DT18), Rowe Mead (DT19) and Station Hill (DT20). Nitrogen dioxide (NO₂) concentrations at these monitoring points were 21.6, 8.3 and 24.9 µg/m³ respectively in 2024⁽¹⁾. These values are comfortably below England's Air Quality Objective (AQO) for NO₂.
- 5.3 The government's *Pollution Climate Mapping* (PCM) model includes six roadside modelling points within Chippenham. The modelling provides predicted concentrations of NO₂ and particulate matter (PM₁₀ and PM_{2.5}). All predicted values are comfortably below England's AQO for the pollutants, i.e. an annual mean of 40 µg/m³ for NO₂ and PM₁₀ and an annual mean of 20 µg/m³ for PM_{2.5}.
- 5.4 In light of the above, the existing concentrations of NO₂, PM₁₀ and PM_{2.5} show comfortable compliance with England's AQO, indicating the locality of the site generally has good air quality.
- 5.5 Notwithstanding the above, Wiltshire Council has declared eight air quality management areas (AQMAs), the nearest of which to the site is 4.5 km to the east on the A4 in Calne. The AQMA was declared in 2013 in respect of the annual mean objective for NO₂, with a measured concentration of 60 µg/m³ – an exceedance of 50% of the AQO. Wiltshire Council's 2024 Annual Status Report indicates that air quality has now improved, with the NO₂ AQO not being exceeded for the past two years. The worst case current (2024) concentration of NO₂ within the AQMA has reduced to 28 µg/m³. While this is now compliant with England's AQO for NO₂, the AQMA remains in place.
- 5.6 Data from the National Atmospheric Emissions Inventory⁽²⁾ show that 3,000,200 tonnes of CO₂ were emitted in Wiltshire in 2022, 638,300 tonnes of which were from domestic energy use and 1,077,500 tonnes of which were from vehicles.
- 5.7 Industrial and other land uses that pose a potential risk of contributing significantly to pollution concentrations are recorded in Defra's *UK Pollutant Release and Transfer Register* (PRTR). The register does not indicate any facilities within 1 km of the site and it is therefore concluded that there are no existing industrial uses in the vicinity of the site that may influence existing baseline pollutant concentrations.

¹ Wiltshire Council, 2024, *2024 Air Quality Annual Status Report (ASR)*.

² <https://naei.energysecurity.gov.uk/laghgapp/>.

Potential significant effects

5.8 The initial identification of potential significant effects is set out in table 5.1.

Component	Potential construction effect?	Potential post-construction effect?	Comments
Local air quality (criteria pollutants)	Yes	Yes	Increased road traffic emissions during and post-construction
Dust	Yes	No	Potential generation of dust during construction
Odour	No	No	No odour-generating uses are proposed
Local climatic effects	No	No	The nature of the proposed development suggests that there will be no localised effects on temperature or the moisture content of the air
Transboundary air quality	No	No	The nature and location of the proposed development mean that there is no potential for significant transboundary effects
Global climate	No	No	The nature and scale of the proposed development suggest that there is no potential for significant global climate effects
Climate adaptation and vulnerability to climate change	No	Yes	There is the potential for increased risk from flooding due to increased rainfall as a result of climate change post-construction
Carbon dioxide budget / emissions	Yes	Yes	Emissions from traffic during and post-construction, use of materials in construction, energy use in buildings post-construction

Table 5.1: Initial air quality and climate scoping checklist

5.9 The potential impacts of air quality include health effects (for human receptors) and impacts on designated nature conservation sites. Human receptors will primarily comprise existing residential dwellings in the locality of the site and on the road network served by the site. Future residents of the built development will also become receptors. Based on Defra's online mapping⁽³⁾, the nearest statutorily designated nature conservation sites are Mortimore's Wood Local Nature Reserve (LNR), approximately 1.3 km to the west, and Bencroft Hill Meadows Site of Special Scientific Interest (SSSI), approximately 2.2 km to the north east.

Screening assessment of potential construction stage effects

5.10 There are no ecological receptors within the relevant screening distances set out in guidance⁽⁴⁾. There are, however, human receptors within the relevant screening distance, including existing dwellings to the west (off Pewsham Way) and to the north on London Road. As such, a detailed assessment of dust from construction activities will be undertaken as a matter of course, which will determine appropriate mitigation strategies for the control of fugitive construction dust in line with industry standard good practice⁽⁴⁾. Such measures will be implemented through adherence to a construction environmental management plan (CEMP), which would be required by a planning condition attached to any consent. As a result, fugitive dust emissions from construction activities should be reasonably controlled and no residual significant adverse effects would be expected.

³ <https://magic.defra.gov.uk/MagicMap/aspix>.

⁴ Institute of Air Quality Management (IAQM), 2024, *Guidance on the assessment of dust from demolition and construction (version 2.2)*.

- 5.11 The movement of materials and personnel to and from a construction site will have associated emissions. However, guidance⁽⁵⁾ suggests that assessment is not required if traffic flows will increase by fewer than 100 HGVs or 500 other vehicles (annual average daily traffic) outside an AQMA and by fewer than 25 HGVs or 100 other vehicles within an AQMA. Construction traffic associated with the proposed development will not exceed these levels, so no significant effects are predicted.

Screening assessment of potential post-construction stage effects

- 5.12 NO₂ concentrations in Chippenham to the north west of the site are well below the annual mean objective of 40 µg/m³. Preliminary traffic flow data provided for the development suggest that the proposed development could increase existing traffic flows by between 5-13% (opening year) relative to the existing baseline. While guidance⁽⁵⁾ suggests that changes of up to around 10% are unlikely to be significant for locations with baseline pollutant concentrations that are less than 75% of England's AQOs, an increase of more than 10% could indicate a change of moderate significance, which may be significant in EIA terms. It is possible, therefore, that additional traffic generated by the proposed development could be assessed to be significant.
- 5.13 The initial traffic forecasts also indicate that additional traffic that will be routed through the Calne AQMA will be significantly above the trigger threshold for requiring a detailed air quality assessment. That is not, however, necessarily an indicator or a significant effect. Indeed, based on current baseline concentrations within the AQMA, the increase in daily traffic (around 6-7%, based on preliminary traffic flow data) would only indicate a 'slight' change, which may not be deemed significant in EIA terms. Notwithstanding this, it is also clear when considering potential cumulative impacts that a highly significant increase in traffic flows within Calne AQMA is forecast. While this needs to be balanced with the general trend of reducing vehicle emissions in England, the potential for a significant residual effect cannot be ruled out without detailed air quality modelling.
- 5.14 Given the potential for significant adverse effects due to traffic-related activity, it is proposed that an assessment of transport-related air quality effects is included within the ES.
- 5.15 As there are no designated sites within normally adopted screening distances from the site, it is proposed that an assessment of the air quality impacts on habitats is scoped out, but will be formally assessed in a stand alone air quality assessment that will accompany the application. The potential for effects on designated sites is examined further in section 12.
- 5.16 Traffic and energy use associated with the occupation of the proposed development will generate CO₂ emissions, as will the development's construction. However, given the scale and nature of the proposed development, the changes are not considered likely to be significant in the context of existing emissions in Wiltshire. The Future Homes Standard will ensure that all new homes built from 2025 will produce 75-80% less carbon emissions than homes delivered under current regulations. It is therefore considered that this will be managed appropriately through the design,

⁵ EPUK and IAQM, 2017, *Land-Use Planning & Development Control: Planning for Air Quality*.

planning, specification and construction process and will not give rise to significant effects.

- 5.17 Each individual discipline scoped into the EIA will be examining and mitigating the impacts of a changing climate on their fields of assessment, as appropriate. This will be undertaken in place of a dedicated climate chapter. Instead, a robust approach is proposed to dealing with climate and greenhouse gases through the measures set out in paragraph 3.3. Further details of these measures to ensure the proposed dwellings are low carbon in operation, and that the proposed development can adapt to climate change, will be set out in the proposals chapter of the ES and described in detail in an energy and sustainability statement that will accompany the planning application.
- 5.18 As discussed in section 16, the site lies within flood zone 1 and is generally at very low risk of surface water flooding, with small areas at low to high risk in the east and south. There is the potential for climate change to increase the risk of surface water flooding through increased rainfall levels and intensity. However, as set out in section 16, this issue is not considered likely to be significant.
- 5.19 Climate impacts specific to other disciplines are addressed in other chapters and it is proposed that greenhouse gas emissions are scoped out of the EIA. Measures to ensure that the proposed dwellings are low carbon in operation, and that the proposed development can adapt to climate change, will be set out in the energy and sustainability statement and ES proposals chapter.
- 5.20 Construction phase effects of the proposed development are unlikely to be significant and it is proposed that these are scoped out of the EIA. However, potential effects will be assessed in a stand alone air quality assessment that will also accompany the planning application.
- 5.21 While operational emissions from the proposed development (e.g. potential emissions from domestic heating etc) are also unlikely to be significant, a potentially significant adverse effect cannot be discounted in respect of traffic-related pollutant emissions, particularly with regard to the Calne AQMA and future cumulative impacts. It is therefore proposed that an assessment of traffic-related air quality impacts is included within the ES. Other operational matters will be assessed in a stand alone air quality assessment that will also accompany the application.

Air quality and climate effects summary

- 5.22 The findings of the scoping process in relation to air quality and climate effects are summarised in table 5.2.

Potential effect	Receptor importance / sensitivity ⁽¹⁾	Magnitude or scale of effect ⁽²⁾	Likely significant?	To be included in the EIA?
Particulates and dust generation during construction	High (Neighbouring population)	Negligible Short term	X	No
Road vehicle emissions during construction	High (Population along local road network)	Negligible Short term	X	No
Road vehicle emissions post-construction	High (Population along local road network)	Large Long term	✓	Yes
Generation of CO ₂ during and post-construction	High (Wiltshire's CO ₂ emissions)	Negligible Long term	X	No
Vulnerability to climate change risks	High (Residents and site users)	Negligible Long term	X	No
Table 5.2: Air quality and climate effects summary Notes: (1) Categories = high, medium, low, negligible (takes into account geographical level of importance) (2) Categories = large, medium, small, negligible (takes into account whether effect is short or long term)				

Proposed assessment methodology

- 5.23 The air quality baseline will be examined using Wiltshire Council's monitoring data and background pollution maps published by Defra. Wiltshire Council's environmental health officer will be contacted to agree the approach and methodology to be used for the assessment.
- 5.24 The traffic-related air quality assessment will appraise the impact of post-construction traffic movements. Detailed dispersion modelling will be undertaken using the ADMS-Roads model or similar. The focus of the modelling will be concentrations of NO₂, PM₁₀ and PM_{2.5} and the potential for effects on specific sensitive receptors. The geographical extent of the assessment will comprise the road network in the vicinity of the site and within Calne AQMA. The assessment will be undertaken using the best practice guidance published by EPUK and the IAQM in *Land-Use Planning & Development Control: Planning for Air Quality* (2017).

6 Community, social and economic effects

Introduction

- 6.1 The proposed development has the potential to cause a range of community, social and economic effects. These include population changes, increased provision of market and affordable housing, generation of employment, and the increased demand for and provision of local services.

Currently known baseline

- 6.2 The majority of the site lies in lower super output area (LSOA) Wiltshire 014C, which had a population of 1,238 people at the time of the 2021 Census. The south eastern edge of the site lies within LSOA Wiltshire 013F, which had a population of 1,499 people in 2021. There were 600 households in LSOA Wiltshire 014C and 633 households in LSOA Wiltshire 013F in 2021⁽⁶⁾. *Wiltshire Local Plan Pre-Submission draft 2020-2038 (Regulation 19)* identifies that approximately 36,740 new dwellings are required in Wiltshire between 2020 and 2038, 13,625 of which are in the Chippenham housing market area. Opinion Research Services' (2023) *Wiltshire Local Housing Needs Assessment Update* states that around 10,451 households will require affordable housing in Wiltshire between 2020 and 2038. Unemployment in Wiltshire (2.3%) is below both the regional (2.5%) and national (3.9%) averages⁽⁶⁾.
- 6.3 Wiltshire Council's (2023) *Childcare Sufficiency Assessment* shows that there is currently a good sufficiency of childcare places in the Chippenham community area. The majority of the site lies within the catchment area of Kings Lodge Primary School, although the south eastern edge is within the catchment area of Derry Hill Church of England Voluntary Aided Primary School. The former currently has a large amount of spare capacity, while the latter is at capacity. The majority of the site is within the catchment area of Abbeyfield School, while the south eastern edge is within the catchment area of Kingsbury Green Academy. The whole site is within the catchment areas of Sheldon School and Hardenhuish School. All the secondary schools currently have spare capacity⁽⁷⁾. Fore's (2023) *Wiltshire Council Local Plan Review: Review and Update of the Infrastructure Delivery Plan* identifies the need for two two-form entry primary schools (incorporating two 60-place nurseries) and two 80-place nurseries in Chippenham to accommodate planned growth.
- 6.4 The site lies within the practice areas of Lodge Surgery, Rowden Surgery and Hathaway Medical Centre in Chippenham and Northlands Surgery and Patford House Surgery in Calne. Wiltshire Council's (2023) *Planning for Chippenham* and *Planning for Calne* state that Lodge Surgery has been redeveloped internally to support an increasing population, while Hathaway Medical Centre has some capacity for new patients, but Rowden Surgery does not. A planning application for a new surgery to replace the existing Patford House Surgery, which has been outgrown, has been approved, while an extension has been built on the Northlands Surgery site.
- 6.5 Wiltshire Council's (2023) *Wiltshire Open Space Assessment Update (2020)* identifies that the Chippenham urban area is deficient in allotment provision, parks and recreation grounds and children's and youths' play space, although it

⁶ <https://www.nomisweb.co.uk>.

⁷ <https://www.get-information-schools.service.gov.uk>.

has surplus provision of amenity green space. The Chippenham rural area is also deficient in allotment provision and children's and youths' play space, but has surplus provision of recreational space. Wiltshire Council's (2017) *Wiltshire Playing Pitch Strategy: Community Area Profiles* identifies a need for additional youth football pitch and artificial grass pitch provision in the Chippenham community area. The potential need for an additional cricket pitch is also identified. The report notes that planned and natural population change will impact on the requirement for pitches for football, rugby, cricket and hockey.

Potential significant effects

6.6 The initial identification of potential significant effects is set out in table 6.1.

Component	Potential construction effect?	Potential post-construction effect?	Comments
Population profile and demography	No	Yes	Increased population and changes to demography as a result of new dwellings
Housing supply	No	Yes	Provision of new market and affordable housing
Employment	Yes	Yes	Generation of employment during and post-construction
Economy	No	No	The creation of employment during and post-construction will not be on a scale sufficient to lead to significant effects on the local economy
Lifestyle / standard of living	No	No	The nature of the proposed development means that it will not affect local standards of living
Health	Yes	Yes	Potential for health and wellbeing effects through generation of noise and emissions to air, provision of public open space and increased demand for healthcare services
Education, healthcare and local services	No	Yes	Increased demand for local services by new residents and provision of public open space
Public health and safety	Yes	Yes	Potential risk to public safety during construction adjacent to the public rights of way on site. Potential health and safety risk from the fuel pipeline and overhead power lines on site during and post-construction
Local environmental amenity	Yes	Yes	Construction works may affect the amenity of local residents and users of the public rights of way. Potential long term changes in amenity post-construction
Telecommunications	No	No	The proposed development will not affect telecommunications
Microclimate (e.g. overshadowing, wind effects)	No	No	The scale of the proposed development limits the potential for microclimate effects
Tourism	No	No	The nature and location of the proposed development mean that there will be no effects on tourism
Table 6.1: Initial community, social and economic effects scoping checklist			

6.7 The increase in population associated with the proposed dwellings has the potential to alter the population profile and demography of LSOA Wiltshire 014C and, to a lesser extent, LSOA Wiltshire 013F. The scale of the proposed development means that this effect has the potential to be significant. The proposed development will provide both market and affordable housing. The identified need for affordable housing and overall housing provision in Wiltshire and the scale of the proposed development mean that this is likely to be significant.

- 6.8 The construction of the proposed development will generate temporary employment in the area. A small number of people will also be employed in the local retail centre post-construction. However, the small number of jobs that will be created and the relatively low unemployment levels in Wiltshire mean that these effects are not considered likely to be significant.
- 6.9 The increased population has the potential to lead to a corresponding increase in demand for local facilities such as schools and healthcare. The proposed development will also provide new public open space. Given that there are identified capacity issues in Chippenham, it is considered that these effects are likely to be significant.
- 6.10 There is the potential for the proposed development to affect the health and wellbeing of local residents through the generation of noise and emissions to air during and post-construction, increased demands for healthcare services post-construction, and the provision of public open space. However, as discussed in sections 5 and 13, construction traffic emissions and the generation of noise are not considered likely to be significant, while post-construction traffic emissions will be covered in the air quality ES chapter. The increased demand for healthcare services and provision of public open space will be covered in other elements of the community and social assessment discussed above. No other potentially significant health and wellbeing effects are envisaged.
- 6.11 There is the potential for construction works adjacent to the public rights of way on site to pose a risk to public safety. However, as the construction site will be securely fenced, it is considered that there is no potential for a significant effect. The fuel pipeline on site poses a potential safety risk during and post-construction. However, as discussed in section 11, this will be addressed through the use of appropriate construction methodologies and the incorporation of an appropriate easement into the master plan. No significant adverse effects are predicted. The overhead power lines on the site also pose a potential safety risk during and post-construction. However, the proposed development will be designed and constructed in accordance with relevant guidance, including that prepared by National Grid, and an appropriate easement will be incorporated within the master plan. No significant adverse effects are predicted.
- 6.12 There is the potential for construction works to lead to a reduction in local amenity. However, as discussed in sections 5 and 13, this will be addressed through standard good practice construction mitigation measures and no significant adverse effects are predicted. The potential for long term changes to amenity through changes to views, including as a result of increased lighting and from the public rights of way on the site, will be examined in the landscape and visual effects assessment and it is not considered appropriate to duplicate coverage here. As discussed in section 13, no significant noise effects are predicted post-construction so these are not considered likely to affect amenity.

Community, social and economic effects summary

- 6.13 The findings of the scoping process in relation to community, social and economic effects are summarised in table 6.2.

Potential effect	Receptor importance / sensitivity ⁽¹⁾	Magnitude or scale of effect ⁽²⁾	Likely significant?	To be included in the EIA?
Changes to local population and demography	Medium (LSOAs' populations)	Small Long term	✓	Yes
Increased provision of market and affordable housing	High (Wiltshire's market and affordable housing supplies)	Small Long term	✓	Yes
Generation of employment during and post-construction	Low (Wiltshire's unemployment level)	Negligible Short and long term	X	No
Effects on health and wellbeing	High (Local population)	Small Long term	✓	Yes – to be covered elsewhere in the EIA
Increased demand for and provision of local facilities	Medium to high (Local facilities)	Small Long term	✓	Yes
Effects on public safety during and post-construction	High (Local population)	Negligible Short and long term	X	No
Effects on local amenity during construction	High (Local population)	Negligible Short term	X	No
Effects on local amenity post-construction as a result of changes to views	High (Local population)	Small to medium Long term	✓	Yes – to be covered in the landscape and visual chapter

Table 6.2: Community, social and economic effects summary

Notes:

(1) Categories = high, medium, low, negligible (takes into account geographical level of importance)

(2) Categories = large, medium, small, negligible (takes into account whether effect is short or long term)

Proposed assessment methodology

- 6.14 The existing community and social baseline conditions will be established in detail through a desk-based study, which will obtain data from a range of sources, including Wiltshire Council and the Office for National Statistics. The potential population increase arising from the development will be estimated based on the 2021 average household size for Wiltshire, which is larger than the average household sizes for the LSOAs and will provide a worst case estimate. This will form the basis for the predictions of increased demand for services and facilities.
- 6.15 The significance of effects will be determined by combining the sensitivity of identified receptors with the predicted magnitude of change, using a matrix. Potential effects will be considered at the LSOA, town and unitary authority level as appropriate.

7 Cultural heritage

Introduction

- 7.1 New development can affect the heritage significance of cultural heritage assets, including buried archaeology, the historic landscape and built heritage features. These can include effects relating to damage to or loss of a heritage asset itself, as well as changes to an asset's setting. A development necessitating archaeological investigations can be beneficial by improving understanding of an area's history or providing a better understanding of the archaeological record.

Currently known baseline

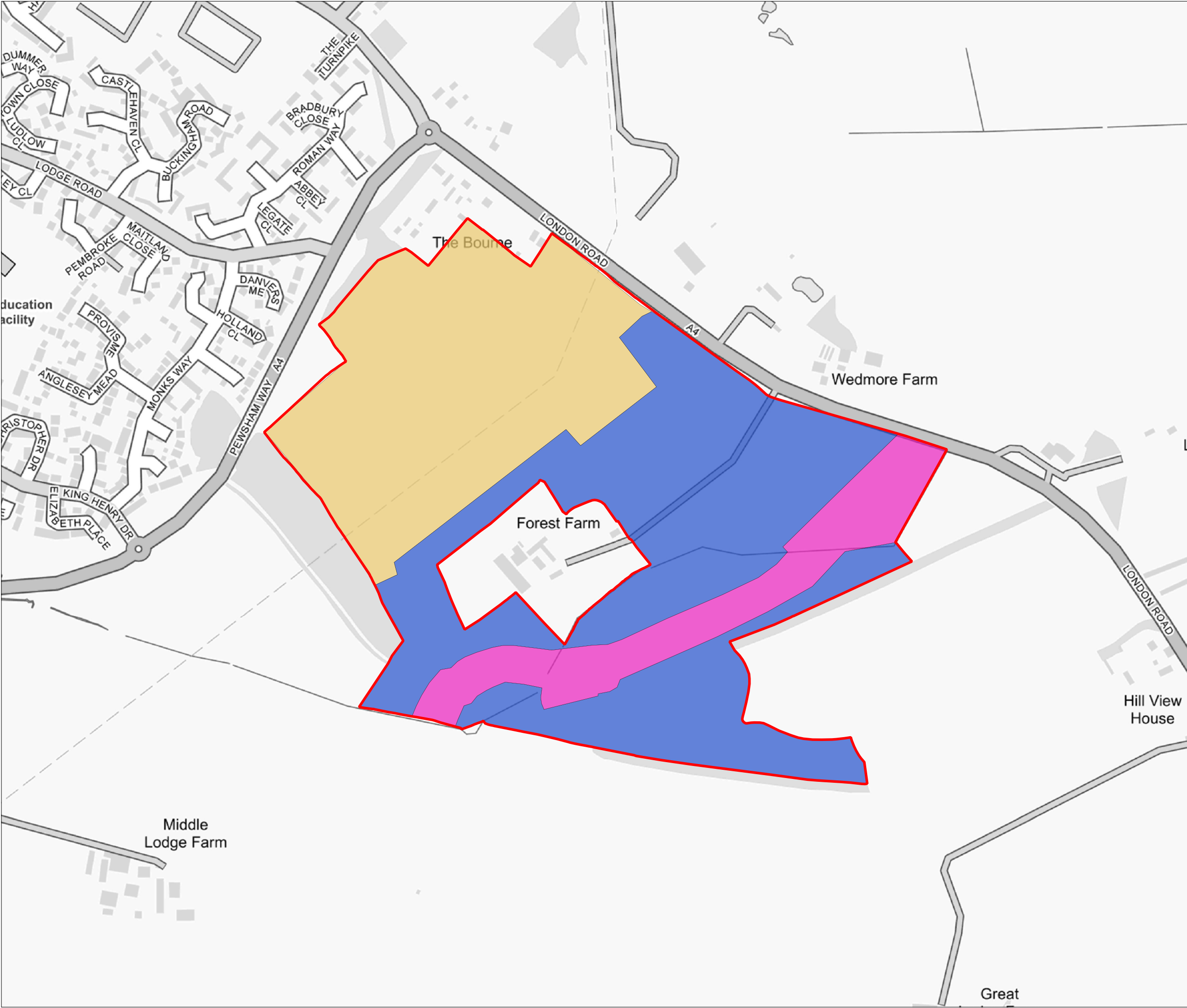
- 7.2 The nearest scheduled monument to the site is the moated site and fishponds east of Rowden Manor, approximately 1.6 km to the north west. Rowden conservation area is approximately 1.1 km to the west, Chippenham conservation area is approximately 1.3 km to the north west, and Derry Hill (Old) conservation area is approximately 1.6 km to the south east. Bowood grade I registered park and garden is approximately 1.7 km to the south east. There are several grade II listed buildings within 1 km of the site, the nearest of which are Gate Farmhouse and a milestone, approximately 260 m to the north west, Forest Gate Farmhouse and Barn, approximately 325 m to the south east, and Hill View, approximately 410 m to the south east. The historic route of the Wilts and Berks Canal, a non-designated heritage asset, runs through the south of the site.
- 7.3 A programme of archaeological trial trenching across the northern half of the site in 2016 (figure 4)⁽⁸⁾ identified a range of Roman features on the site, including ditches, pits, a potential roundhouse, pottery, cremation remains and a potential livestock enclosure. No features of prehistoric date were positively identified and only one significant feature of later than Roman date was confirmed: a possible track or area of hardstanding with post-Medieval / modern pottery. Further archaeological trial trenching was undertaken in the south of the site in 2022 (figure 4)⁽⁹⁾. This recorded finds of Roman pottery in the south and south east, evidence of Medieval / post-Medieval ridge and furrow in the south, and a post-Medieval enclosure in the south west.
- 7.4 The site makes a low to negligible contribution to the area's historic landscape character, as it now contains a pattern of modern agriculture with significant loss of historic field boundaries.

Potential significant effects

- 7.5 The initial identification of potential significant effects is set out in table 7.1.

⁸ Archaeology South East, 2016, *Archaeological Evaluation Report Land at Forest Farm Chippenham, Wiltshire*.

⁹ Wessex Archaeology, 2022, *Future Chippenham Wiltshire Archaeological Evaluation*.



- 2015 – Archaeology south-east
- 2022 – Wessex Archaeology
- Ongoing 2024/25 – Pre-Construct Archaeology
- Site extent

Notes/Revision

Land at Forest Farm, Chippenham
Gleasons Development Ltd

0 100 200 m



Figure 4: Proposed trench area and previously excavated trench areas

Status:	Drawn by: JC	Checked by: DR
Project number: 227610	Scale @A3: 1:5,000	Date created: 2024/12/4
Drawing number: TOR-H004	Revision: -	

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Component	Potential construction effect?	Potential post-construction effect?	Comments
Archaeology	Yes	No	Potential disturbance of archaeological remains on site during construction
Scheduled monuments	Yes	Yes	Potential for effects on the setting of the moated site and fishponds scheduled monument during and post-construction
Architecture / buildings / structures	Yes	Yes	Potential for changes to the settings of nearby listed buildings during and post-construction
Conservation areas	Yes	Yes	Potential for changes to the settings of the conservation areas during and post-construction
Historic parks and gardens	Yes	Yes	Potential for changes to the setting of Bowood registered park and garden during and post-construction
Other historic interest	Yes	Yes	Potential changes to the historic landscape character of the site
Table 7.1: Initial cultural heritage scoping checklist			

- 7.6 The site is currently undeveloped and has been found to contain archaeological remains. Without mitigation, the destruction of below ground archaeology by construction works would be a significant effect. There is also the potential for a significant effect on the historic route of the Wilts and Berks Canal if this is affected by ground works.
- 7.7 The moated site and fishponds east of Rowden Manor scheduled monument is separated from the site by intervening areas of woodland and built development, which will screen views of the proposed development. As a result, no significant adverse effects are predicted on the heritage significance of the scheduled monument from changes to its setting.
- 7.8 The proposed development will lead to changes to views into the site, including from elevated areas to the south east, and increases in traffic on the local road network, including on the A4 and the A342, which runs through the Derry Hill (Old) conservation area and alongside Bowood registered park and garden. The scale of the proposed development means that these changes have the potential to lead to significant effects on the settings of the conservation area, registered park and garden and the listed buildings in the area.
- 7.9 Rowden and Chippenham conservation areas are separated from the site by the intervening residential area of Pewsham, which will screen views of the proposed development. No significant effects are therefore predicted on the heritage significance of these conservation areas from changes to their settings.
- 7.10 The development of the site will lead to the loss of its remaining historic agricultural character. However, as this has already undergone some changes, this effect is not considered likely to be significant.

Cultural heritage effects summary

- 7.11 The findings of the scoping process in relation to cultural heritage effects are summarised in table 7.2.

Potential effect	Receptor importance / sensitivity ⁽¹⁾	Magnitude or scale of effect ⁽²⁾	Likely significant?	To be included in the EIA?
Effect on archaeological remains on the site during construction	Low to medium (Archaeological remains on site)	Large Long term	✓	Yes
Change to the setting of the moated site and fishponds east of Rowden Manor scheduled monument during and post-construction	High (Scheduled monument)	Negligible Short and long term	X	No
Change to the settings of listed buildings in the vicinity of the site during and post-construction	High (Listed buildings in the vicinity of the site)	Small to medium Short and long term	✓	Yes
Change to the setting of the Derry Hill (Old) conservation area during and post-construction	Medium (Derry Hill (Old) conservation area)	Small Short and long term	✓	Yes
Change to the settings of the Rowden and Chippenham conservation areas during and post-construction	Medium (Rowden and Chippenham conservation areas)	Negligible Short and long term	X	No
Change to the setting of the Bowood registered park and garden during and post-construction	High (Bowood registered park and garden)	Small Short and long term	✓	Yes
Loss of the site's historic landscape character	Negligible to low (Site's historic landscape character)	Small to medium Long term	X	No

Table 7.2: Cultural heritage effects summary

Notes:

(1) Categories = high, medium, low, negligible (takes into account geographical level of importance)

(2) Categories = large, medium, small, negligible (takes into account whether effect is short or long term)

Proposed assessment methodology

- 7.12 An assessment of designated and non-designated heritage assets will be undertaken in accordance with paragraphs 202 to 220 of the National Planning Policy Framework (NPPF; 2024), the MHCLG's (2019) NPPG: *Historic environment* and Historic England's (2017) *Good Practice Advice in Planning Note 3: The Setting of Heritage Assets*. An updated desk-based assessment will be undertaken, which will review the findings of the previous archaeological evaluations.
- 7.13 Following consultation with the Wiltshire County Archaeologist, it was agreed that the remaining areas of the site will be subject to a programme of archaeological trial trenching (figure 4). This commenced on 11 November 2024, following an approved written scheme of investigation. The results of the trial trenching will inform an appropriate mitigation strategy, if significant archaeological remains are encountered.
- 7.14 The potential for effects on the heritage significance of designated and non-designated assets as a result of changes to their setting will be informed by the landscape and visual and traffic and transport assessments, as appropriate.
- 7.15 The significance of effects will be determined by combining the importance of identified receptors with the predicted magnitude of change, using a matrix.

8 Ground conditions

Introduction

- 8.1 The existing ground conditions of a site can be of concern due to the potential mobilisation of contaminants during construction or exposure of sensitive receptors such as construction workers, groundwater, surface waters and future site users to such material. The potential for the proposed development to alter the ground conditions of the site post-construction is limited.

Currently known baseline

- 8.2 The site is greenfield and there are no existing or historic industrial uses on or in the vicinity of the site with the potential to lead to significant contamination. There is the potential for limited hotspots of contamination associated with the agricultural use of the site, for example from localised fuel spills / leaks and the use of pesticides or herbicides. A small brickworks and clay pit are shown on the site on the 1886 OS Map, but these are marked as disused on the 1925 OS Map. Potential limited contamination sources associated with these uses include Made Ground and infilling of the pit.
- 8.3 The site is not within a minerals safeguarding area or mineral resource zone and online mapping⁽¹⁰⁾ indicates that the site is in an area that is at low risk from unexploded ordnance.

Potential significant effects

- 8.4 The initial identification of potential significant effects is set out in table 8.1.

Component	Potential construction effect?	Potential post-construction effect?	Comments
Geology and geomorphology	No	No	The nature and location of the development mean that effects on geology are unlikely
Ground contamination	Yes	Yes	Limited potential for contamination from existing agricultural use and historic brickworks and clay pit
Mineral resources	No	No	The site is not within a minerals safeguarding area or mineral resource zone
Unexploded ordnance	No	No	The site is not known to be in an area of elevated unexploded ordnance risk

Table 8.1: Initial ground conditions scoping checklist

- 8.5 The existing and historic land uses on the site mean that the potential for contamination is limited to isolated hotspots that could have arisen from the site's agricultural use, the historic brickworks or the infilling of the former clay pit. However, it is considered that any hotspots found during construction can be mitigated through the use of standard personal protective equipment and good practice construction techniques, which will be set out in a CEMP. No significant effects are therefore predicted on human health and the water environment as a result of mobilisation of, or contact with, existing contamination during or post-construction.
- 8.6 It is therefore proposed that ground conditions is not scoped into the EIA and will not be considered in the ES. However, a phase 1 geoenvironmental report

¹⁰ <https://zeticauxo.com/guidance/risk-maps/>.

will be submitted in support of the planning application as a stand alone document, in accordance with local requirements.

Ground conditions effects summary

- 8.7 The findings of the scoping process in relation to ground conditions effects are summarised in table 8.2, which confirms that there will not be a specific ground conditions chapter in the ES.

Potential effect	Receptor importance / sensitivity ⁽¹⁾	Magnitude or scale of effect ⁽²⁾	Likely significant?	To be included in the EIA?
Potential for human health effects from contact with contaminants during construction	High (Construction workers)	Negligible Short term	X	No
Potential for human health effects from contact with contaminants post-construction	High (Future residents)	Negligible Long term	X	No
Potential for mobilisation of existing contaminants into the water environment during construction	Low to medium (Watercourse and ditches on site)	Negligible Short term	X	No
Table 8.2: Ground conditions effects summary Notes: (1) Categories = high, medium, low, negligible (takes into account geographical level of importance) (2) Categories = large, medium, small, negligible (takes into account whether effect is short or long term)				

9 Land use and land take

Introduction

- 9.1 Proposed developments can have an effect on the local area through the introduction of a new land use, which can complement, co-exist or conflict with the existing land uses, and through the loss of existing uses on site.

Currently known baseline

- 9.2 The site is currently in agricultural use and comprises several fields used for pasture. The majority of the agricultural land (approximately 31.2 ha) is classified as grade 3b (moderate quality), while approximately 7.7 ha are classified as grade 3a (good quality)⁽¹¹⁾. Public footpath CHIP16 runs through the west of the site and connects to public footpath CALW83 in the south.

Potential significant effects

- 9.3 The initial identification of potential significant effects is set out in table 9.1.

Component	Potential construction effect?	Potential post-construction effect?	Comments
Agricultural land and soils	Yes	No	Loss of agricultural land and soils on the site
Horticulture	No	No	No horticulture on the site or proposed
Forestry	No	No	No commercial forestry on the site or proposed
Recreation / open space / rights of way	Yes	Yes	Effects on existing public rights of way during construction and provision of new public open space land use on site
Mineral extraction	No	No	No mineral extraction on the site or proposed
Industrial / commercial / retail	No	Yes	Provision of new retail land use on site
Residential	No	Yes	Provision of new residential land use on the site
Health / social / education	No	No	No health / social / education uses on the site or proposed
Waste disposal	No	No	No waste uses on the site or proposed
Other (specify)	No	No	No other land uses on the site or proposed

Table 9.1: Initial land use and land take scoping checklist

- 9.4 The proposed development will lead to the loss of 38.9 ha of land from agricultural production and the associated loss of soils within the area proposed for built development, although these will be retained within the green space. Given the relatively small area of land to be lost in relation to the total area of agricultural land in Wiltshire (257,237 ha in 2021⁽¹²⁾), and the fact that no grade 1 or 2 land and only a very small area of grade 3a best and most versatile land will be lost, it is considered that this is a negligible effect that will not be significant.
- 9.5 New residential, retail and public open space land uses will be provided on site through the proposed development. However, as discussed in section 6, these effects will be examined in the community and social effects assessment. It is not considered appropriate to duplicate coverage in this section.

¹¹ ADAS, 2016, *Agricultural Land Classification Land at Forest Farm Chippenham*.

¹² Defra, 2022, *Key land use, crop areas and livestock populations on commercial agricultural holdings in 2021 by Local Authority*.

- 9.6 There is the potential for effects on the existing public rights of way on the site if temporary diversions are required as a result of construction activities. However, any effects would be short term and the public rights of way will not be closed or permanently diverted, so the effects are not considered likely to be significant.
- 9.7 It is therefore proposed that land use and land take are not scoped into the EIA and will not be considered in the ES. However, an agricultural land classification report will be submitted in support of the planning application as a stand alone document.

Land use and land take effects summary

- 9.8 The findings of the scoping process in relation to land use and land take effects are summarised in table 9.2, which confirms that there will not be a specific land use and land take chapter of the ES, although issues associated with the provision of new land uses will be examined within the community and social effects chapter.

Potential effect	Receptor importance / sensitivity ⁽¹⁾	Magnitude or scale of effect ⁽²⁾	Likely significant?	To be included in the EIA?
Loss of agricultural land and soils on the site	Low to medium (Agricultural land on the site)	Negligible Long term	X	No
Effects on the existing public rights of way on the site	Low (Public rights of way on the site)	Small Short term	X	No
Introduction of new residential, retail and public open space land uses on the site	Low (Land uses on the site)	Medium Long term	✓	Yes – to be covered in the community and social chapter
Table 9.2: Land use and land take effects summary Notes: (1) Categories = high, medium, low, negligible (takes into account geographical level of importance) (2) Categories = large, medium, small, negligible (takes into account whether effect is short or long term)				

10 Landscape and visual effects

Introduction

- 10.1 Effects on the landscape can arise from a development giving rise to direct changes to physical elements of the receiving landscape, which may affect its features, character and quality; or from indirect effects on the character and quality of the surrounding landscape. Visual effects can result if the development changes the character and quality of people's views. Landscape and visual effects are linked, but have different attributes, so are considered as two elements.

Currently known baseline

- 10.2 At the county level, the site lies within the Avon Open Clay Vale landscape character area, as identified in the *Wiltshire Landscape Character Assessment* (Land Use Consultants, 2005). The key characteristics of this area include a low-lying river landscape with damp meadow and pasture along the valley floor, the dominant presence of water in the form of ditches, brooks, streams and rivers, a pastoral land use, large scale geometric fields with hedgerows or open drainage channels defining boundaries, a varied settlement pattern, and major transport corridors.
- 10.3 At the former district level, the site lies within the Avon Valley Lowland landscape character area, as identified in the *North Wiltshire Landscape Character Assessment* (WHITE Consultants, 2004). The main characteristics of this area include a low-lying river landscape, the dominant presence of water in the form of ditches, streams and rivers with related riparian vegetation and structures, damp meadow and pasture along watercourses and the valley floor, intact and predominantly well-managed hedgerows, frequently with hedgerow trees, areas of high quality arable agricultural land, a strong rural sense of place that begins to break down around Chippenham, a green valley floor through Chippenham, a broad expansive skyline that is frequently unbroken by development, and the significance of electricity transmission lines.
- 10.4 At the local level, the site lies within the Land to the south of Pewsham landscape setting area, as identified in the *Chippenham Landscape Setting Assessment* (TEP, 2014). The special qualities of this area include a wooded river valley that provides a high degree of enclosure and a strong screen to the urban edge, mature trees and hedgerows providing enclosure and forming prominent features in the landscape, linear blocks of woodland, prominent mature hedgerow oaks, views towards the wooded limestone ridge forming a backdrop to the landscape, a strong wooded edge to Chippenham, and a distinctive built form along London Road and Forest Lane, often using local building materials.
- 10.5 CBA's (2023) *Wiltshire Local Plan Review: Sites Landscape Appraisals* concluded that the site lies within an area of generally medium sensitivity to housing development, with areas of higher sensitivity to the south and west of the site where there are landscape features in good condition that contribute to the tranquillity and separation of Chippenham from the River Avon. The pylons and the A4 are identified as being intrusions into the generally rural character of the landscape.

- 10.6 There are no national or local landscape designations in the vicinity of the site. As discussed in section 7, Derry Hill (Old) conservation area and Bowood grade I registered park and garden are approximately 1.6 km and 1.7 km to the south east respectively.
- 10.7 Visual surveys of the site undertaken in February 2022 and April 2024 have identified that the site is contained by development to the north west, tree belts along Pewsham Way to the north west, and mature woodland along the south western boundary. Beyond the site to the south and south east, further mature tree belts and hedgerows provide a local level of enclosure. Local views of the site are available, to varying degrees, from properties in close proximity to the site boundaries, including west of Pewsham Way to the north west, between Pewsham Way and the A4 London Road to the north, east of the A4 London Road to the east, and west of the A4 London Road to the south east.
- 10.8 Local views will also be available from public rights of way crossing the site, local public rights of way, including some glimpsed views from the footpaths alongside Pewsham Locks to the south, and from local footpaths, cycleways and roads. There are some more distant open and elevated views from local roads, footpaths, a number of houses on higher land in Stanley on Bencroft Hill to the east, and on Nocketts Hill and Derry Hill to the south east.

Potential significant effects

- 10.9 The initial identification of potential significant effects is set out in table 10.1.

Component	Potential construction effect?	Potential post-construction effect?	Comments
Landform / topography	No	No	No significant re-profiling of the land is proposed during construction
Land cover	Yes	Yes	Change of land cover from agricultural use to buildings and public open space
Landscape / townscape character	Yes	Yes	Character will change from agricultural to built development and open space
Protected landscapes / townscapes	Yes	Yes	Potential for changes to views from Derry Hill (Old) conservation area and Bowood registered park and garden
Sensitive views	Yes	Yes	Changes to views from residential properties, public rights of way, roads and the wider countryside

Table 10.1: Initial landscape and visual effects scoping checklist

- 10.10 The proposed development will change the land cover on the site from agricultural land to buildings and public open space. Similarly, the landscape character of the site will change from agricultural to built development and open space. This also has the potential to affect surrounding landscape character areas from which the site is visible. The sensitivity of the site and surrounding landscapes and the scale of the changes mean that these effects have the potential to be significant.
- 10.11 The proposed development will also lead to changes to views from sensitive visual receptors in the vicinity of the site, including residential properties and public rights of way. Given the scale of the proposed development, and the presence of sensitive receptors within and close to the site, it is considered that these changes have the potential to lead to significant effects. Initial modelling indicates that Derry Hill (Old) conservation area and Bowood registered park and garden fall outside the zone of theoretical visibility (ZTV).

Landscape and visual effects summary

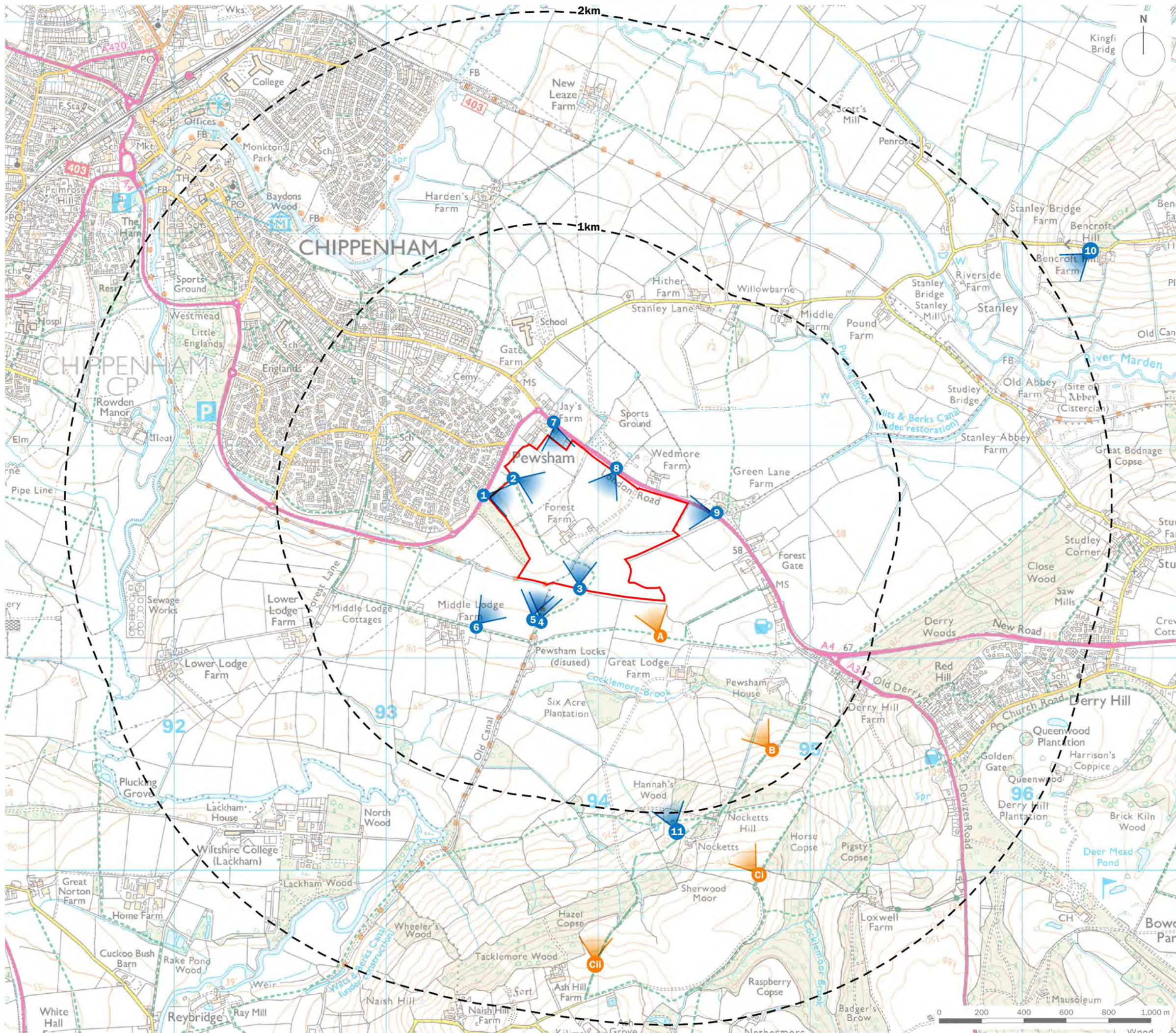
10.12 The findings of the scoping process in relation to landscape and visual effects are summarised in table 10.2.

Potential effect	Receptor importance / sensitivity ⁽¹⁾	Magnitude or scale of effect ⁽²⁾	Likely significant?	To be included in the EIA?
Changes to land cover of the site	Medium to high (Site's land cover)	Medium to large Long term	✓	Yes
Changes to landscape character of the site and effects on surrounding landscape / townscape character	Medium to high (Character of site and surrounding areas)	Medium to large Long term	✓	Yes
Changes to views from designated landscapes and townscapes	High (Conservation area and registered park and garden)	Negligible Long term	X	No
Changes to other sensitive views, including from residential properties and public rights of way	Medium to high (Visual receptors in the vicinity of the site)	Medium to large Long term	✓	Yes

Table 10.2: Landscape and visual effects summary
Notes:
(1) Categories = high, medium, low, negligible (takes into account geographical level of importance)
(2) Categories = large, medium, small, negligible (takes into account whether effect is short or long term)

Proposed assessment methodology

- 10.13 The *Guidelines for Landscape and Visual Impact Assessment 3rd Edition* (GLVIA; 2013) produced by the Landscape Institute and the Institute of Environmental Management and Assessment will be used to guide the assessment of the site and surrounding area. Reference will also be made to the local, former district and county-level landscape character assessments.
- 10.14 The landscape and visual assessment will include determination of the landscape character of the site and surrounding area, the value of the landscape and the existing land cover on site. This is being undertaken through an updated desk study and site visits. A detailed study of the visual setting of the site and the potential visual receptors that may be affected by the development proposals is being undertaken. This includes updating mapping of the ZTV that, together with testing in the field, informs the extent of the study area. The ZTV is derived from digital landform and surface height data and so takes account of the screening effects of intervening landform, buildings, structures and vegetation.
- 10.15 The ZTV is then refined by walking and driving local roads, public rights of way and other publicly accessible viewpoints to arrive at a more accurate, 'field-tested' zone of primary visibility (ZPV). This is where views of the proposed development would normally be at close range and open. Beyond the ZPV lies a zone of visibility that is less open because it is partly screened or filtered.
- 10.16 Within the ZPV there are many individual points from which views towards the site are available. A number viewpoints are therefore selected for assessment that are considered to be representative of the nature of the views from each of the receptor groups to enable the worst case visibility of the site to be examined. Representative viewpoints were established and agreed with Wiltshire Council's landscape department in 2022 (figure 5). Further



-  Site Boundary
-  Range Rings (at 1km intervals)
-  Photoviewpoint Location
-  Additional PVP Locations Suggested by the LPA 13.06.22 Together with the Note:

"In the interest of presenting worst case scenarios' etc I do appreciate that final locations for any of your proposed and my suggested additional PVL's may require slight adjustment on site when you take your photos etc."

client

Gleeson Land

project title

Forest Farm, Chippenham

drawing title

Figure 5: Photoviewpoint Location Plan

date	28 MARCH 2024	drawn by	GYo
drawing number	edp7351_d002a	checked	TRa
scale	1:17,500 @ A3	QA	RBa

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consultation was undertaken in 2024. Photographs from representative viewpoints were undertaken in 2022 and updated in April 2024. Photographs will be presented in accordance with best practice guidance, as set out in *Visual Representation of Development Proposals, Technical Guidance Note 06/19* (Landscape Institute, 2019). The precise locations (Ordnance Survey grid reference), date and time of day will be described for each viewpoint taken.

- 10.17 The landscape and visual impact assessment will also be informed by an arboricultural impact assessment for the proposed development, which will be submitted as a stand alone document in support of the planning application.
- 10.18 The significance of the effects on landscape and visual receptors will be determined by combining the sensitivity of identified receptors with the predicted magnitude of change, using a matrix prepared in accordance with the GLVIA and set out within the landscape and visual impact assessment methodology.

11 Major accidents / disasters

Introduction

- 11.1 A new development can increase the risk from major accidents / disasters if it introduces new receptors to a location close to a major hazard site, such as a fuel terminal. Alternatively, new development itself can introduce a new source of major accident risk.

Currently known baseline

- 11.2 There are no control of major accident hazard (COMAH) sites within 4 km of the site and no high pressure gas mains in the vicinity. A fuel pipeline crosses the northern part of the site in a north west-north east alignment.
- 11.3 As discussed in section 16, the site is in fluvial flood zone 1 and is largely at very low risk of surface water flooding, with small areas at low to high risk in the east and south. It is not in an area at risk of any other forms of natural disaster.

Potential significant effects

- 11.4 The initial identification of potential significant effects is set out in table 11.1.

Component	Potential construction effect?	Potential post-construction effect?	Comments
Major accidents	Yes	Yes	The nature of the proposed development means that it does not have the potential to lead to major accidents that could pose a significant risk to human health, cultural heritage or the environment. However, the presence of an aviation fuel pipeline at the site means that there is a potential risk of a major accident
Disasters	No	No	The risk from flooding is addressed in section 16. The location and nature of the proposed development mean that it is not at risk from any other forms of disaster

Table 11.1: Initial major accidents / disasters scoping checklist

- 11.5 Without mitigation, there is the potential for damage to the fuel pipeline that crosses the site during construction. However, an appropriate easement will be incorporated into the design of the master plan in line with regulatory requirements and all buildings will be located outside this zone. In addition, construction works will be carried out in accordance with relevant regulatory requirements and guidance. This requirement will be incorporated into the CEMP that will be required by condition and this, together with a robust master plan design, will ensure that no significant construction or post-construction effects are likely to arise in relation to the fuel pipeline.
- 11.6 It is therefore proposed that major accidents and disasters are not scoped into the EIA and will not be considered in the ES.

Major accidents / disasters effects summary

- 11.7 The findings of the scoping process in relation to major accidents and disasters are summarised in table 11.2, which confirms that there will not be a specific major accidents / disasters chapter of the ES.

Potential effect	Receptor importance / sensitivity ⁽¹⁾	Magnitude or scale of effect ⁽²⁾	Likely significant?	To be included in the EIA?
Major accidents due to the presence of the fuel pipeline on site	High (Construction workers, residents and site users)	Negligible Short and long term	X	No
Table 11.2: Major accidents / disasters effects summary Notes: (1) Categories = high, medium, low, negligible (takes into account geographical level of importance) (2) Categories = large, medium, small, negligible (takes into account whether effect is short or long term)				

12 Natural heritage

Introduction

- 12.1 Potential natural heritage effects that could arise from a development such as that proposed at Forest Farm, Chippenham, include habitat loss, habitat degradation during and post-construction, killing or disturbance of animals during and post-construction, loss of or modification to breeding, roosting and foraging habitat, and effects on designated nature conservation sites (e.g. from increased public use).

Currently known baseline

- 12.2 There are no national site network (NSN) sites (i.e. Special Areas of Conservation (SAC) or Special Protection Areas (SPA)) or Ramsar sites within 5 km of the site. The nearest is the Bath & Bradford-on-Avon Bats SAC, which is approximately 9.4 km to the south west and is designated for its populations of greater horseshoe, lesser horseshoe and Bechstein's bats. There are three Sites of Special Scientific Interest (SSSI) within 5 km of the site: Bencroft Meadows SSSI, approximately 2.2 km to the north east, which is designated for its unimproved pasture of very high botanical quality, Kellaways – West Tytherton, River Avon SSSI, approximately 2.4 km to the north east, which is designated for its geological interest, and Spye Park SSSI, approximately 3.5 km to the south, which is designated for its large expanses of alder woods, oak woods, parkland and dry acidic grassland.
- 12.3 There are numerous locally designated nature conservation sites within 2 km of the site. The nearest are Nocketts Hill Copse Local Wildlife Site (LWS), approximately 910 m to the south east, Middle Lodge Wood LWS, approximately 950 m to the south west, and Baydons Meadow LWS, approximately 1 km to the north west.
- 12.4 An Extended Phase 1 habitat survey was undertaken on the site, which contains a range of habitats of varying ecological value, in 2021 and updated in 2024. The majority of the site comprises improved grassland. There are hedgerows along the majority of the field boundaries, several of which are species-rich. Two of the hedgerows in the north west of the site are classified as 'important' under the Hedgerow Regulations 1997, based on ecological criteria. Mature oak trees were recorded within the site and semi-natural broadleaved woodland partly borders the site to the west, east and south. A small orchard lies within the farm complex adjacent to the site. There is a watercourse running through the site from the north east to the south west and several ditches, most of which are associated with the hedgerows. Hedgerows, lowland mixed deciduous woodland, rivers and traditional orchards are Priority Habitats. No legally controlled invasive plant species were identified within the site during surveys.
- 12.5 A range of protected species surveys was undertaken on site in 2022. The Extended Phase 1 habitat survey update in 2024 did not identify any significant changes to the types or extent of habitats on site. However, it was considered appropriate to update several of the Phase 2 surveys to inform the development proposals. As the habitats on site had not changed significantly, the results of the hedgerow, reptile, breeding bird, hazel dormouse and bat activity surveys undertaken in 2022 are still considered valid. A summary of the surveys undertaken is provided in table 12.1.

Survey	Date	Methodology
Habitat Condition Assessment	May 2024	Habitat Condition Assessment of all habitats on site following Statutory Metric guidance (Defra, 2024)
Invasive plants	May 2022 and May 2024	Survey to identify the presence of any legally controlled invasive plants
Hedgerow	May 2022	In accordance with survey guidelines published by Defra (2007)
Great crested newt	May 2022 and May 2024	eDNA surveys (sampled in accordance with Biggs et al, 2014). Habitat Suitability Index (HSI) survey (Oldham et al, 2000)
Reptiles	April to June 2022	Undertaken according to standard methodology (Froglife, 1999)
Breeding birds	April to June 2022	Undertaken according to a modified Common Bird Census methodology (Gilbert et al, 1998)
Hazel dormouse	April to October 2022	Undertaken following standard methodology (Bright et al, 2006)
Bat roosts	July to September 2022 and April to August 2024 (trees only)	Preliminary roost assessment of all trees and buildings (within adjacent farm complex) in accordance with BCT guidelines (Collins, 2016). For impacted (directly / indirectly) trees, dusk / dawn emergence / re-entry surveys to be undertaken in accordance with BCT guidelines (Collins, 2016). Additional aerial tree climbing surveys undertaken in 2024
Bat activity	April to October 2022	In accordance with BCT guidelines (Collins, 2016)
Badger	April 2022 and April 2024	In accordance with Harris et al (1989)
Otter	April to October 2022 and April to June 2024	In accordance with survey guidelines (Chanin, 2003)
Water vole	April to October 2022 and April to June 2024	In accordance with survey guidelines (Dean et al, 2016)

Table 12.1: Summary of Phase 2 ecological surveys undertaken

- 12.6 A common pipistrelle bat roost was identified in one of the farm buildings adjacent to the site and two common pipistrelle bat roosts were identified in trees within the site. Low numbers of individuals were recorded in each roost and they were not maternity roosts. Due to access restrictions, it was not possible to update the emergence / re-entry surveys of the buildings in 2024. Numerous bat species were recorded foraging and navigating across the site, with low to moderate levels of activity. The principal areas of activity included the hedgerows, stream corridor and the edge of the adjacent semi-natural broadleaved woodland to the immediate west of the site. The most abundant species was common pipistrelle. Light-sensitive bat species, including lesser horseshoe bat, Myotis species, long-eared species and barbastelle, were recorded on site at low levels.
- 12.7 No evidence of great crested newt was recorded from eDNA testing and a HSI survey of eight ponds within 250 m of the site in 2022. Of the update eDNA surveys in 2024, all were negative for the presence of great crested newt except one pond approximately 155 m north of the site. This returned a positive result, indicating that great crested newt is present. Common toads were recorded along the hedgerows during the reptile surveys. A low population of grass snake was recorded along two hedgerows within the site. Three outlier badger setts were recorded on site, while three main setts and an annexe sett were recorded to the immediate south east and south west of the site. Mammal

tracks were present throughout the site and the grassland provides suitable habitat for badger.

- 12.8 Breeding-bird surveys recorded an assemblage of species that is typical of a rural, agricultural landscape in this location. A total of 30 bird species was recorded, of which 23 were either confirmed, probably or possibly breeding on site. A number of notable species were considered to have definitely, possibly or probably bred, including red kite, yellowhammer, dunnock, bullfinch, song thrush, house sparrow, starling and skylark. A barn owl roost was recorded in a tree on site in 2024. No evidence of water vole was recorded along the watercourse; no evidence of otters was found along the watercourse or elsewhere within the site. Periodic use of the watercourse by otter is assumed, while water vole is considered to be absent from the site. No evidence of hazel dormouse was recorded within the site and there are no records of this species within 2 km of the site. This species is assumed to be absent from the site.

Potential significant effects

- 12.9 The initial identification of potential significant effects is set out in table 12.2.

Component	Potential construction effect?	Potential post-construction effect?	Comments
Habitat types	Yes	Yes	Loss of existing habitats and creation of new habitats on the site
Protected species	Yes	Yes	Potential for effects from habitat loss and increased disturbance
Ecosystem integrity	No	No	The nature of the habitats in the vicinity of the site suggests that overall ecosystem integrity will not be affected
Wildlife conservation	Yes	Yes	Potential for effects on designated nature conservation sites from increased recreational use and pollution
Resource management	No	No	The management of natural resources (such as woodland, lakes etc) will not be affected
Natural processes	No	No	No changes are predicted to natural processes (such as hydrodynamics, erosion and deposition etc)

Table 12.2: Initial natural heritage scoping checklist

- 12.10 The proposed development will lead to the loss of the existing grassland habitat on site, although the trees and hedgerows will be retained where possible. New habitats will be created on the site. While the habitats to be lost are generally of negligible to low intrinsic value, the loss will be large in the context of the site. It is therefore considered that these effects have the potential to be significant.
- 12.11 Surveys have identified that the site supports a range of protected and priority species, including several species of bats, badgers, grass snakes and breeding birds. There is the potential for the proposed development to affect these through habitat loss and fragmentation, as well as increased disturbance from noise, light and recreational activities. Given the scale of the proposed development and the importance of the species present on site, these effects have the potential to be significant.
- 12.12 The proposed development was included in the draft allocations examined by LUC's (2023) *Wiltshire Local Plan Review Habitats Regulations Assessment Appropriate Assessment*. The report's screening assessment concluded that there is the potential for the development (as part of the wider allocation) to lead

to effects on internationally important nature conservation sites as a result of changes to air quality, water quality and water quantity.

- 12.13 However, the review of catchment information in the detailed appropriate assessment found that the proposed development is not within a catchment with the potential to lead to significant effects on internationally important nature conservation sites as a result of changes to water abstraction or increased discharge of wastewater. Air quality modelling in the report found that there would be no likely significant effects as a result of increased emissions from the local plan allocations. Given these findings, no significant adverse effects are predicted on internationally important nature conservation sites as a result of the proposed development.
- 12.14 The site is not within the identified impact risk zones for residential development for any of the SSSIs and none of the SSSIs are within 200 m of roads that are likely to experience the greatest traffic increases as a result of the proposed development. No significant effects are therefore predicted on the SSSIs from traffic-related emissions, water pollution or increased recreational use by residents of the proposed development.
- 12.15 The distance of the LWSs from the site means that there is no potential for significant effects from disturbance or pollution during construction. As no significant adverse effects are predicted on water quality or hydrology post-construction, there is no potential for significant effects on the LWSs. Middle Lodge Wood LWS is not publicly accessible, while there are clearly defined public rights of way along the edge of Nocketts Hill Copse LWS and Baydons Meadow LWS, which are likely to restrict recreational disturbance within the designated sites. This, together with the provision of public open space within the proposed development and connections to the wider public rights of way network, mean that locally designated nature conservation sites are not likely to be significantly affected by increased recreational use post-construction.

Natural heritage effects summary

- 12.16 The findings of the scoping process in relation to natural heritage effects are summarised in table 12.3.

Potential effect	Receptor importance / sensitivity ⁽¹⁾	Magnitude or scale of effect ⁽²⁾	Likely significant?	To be included in the EIA?
Loss of existing habitats and creation of new habitats on the site	Negligible to low (Habitats on the site)	Large Long term	✓	Yes
Effects on protected and priority species from habitat loss and disturbance during and post-construction	High (Species using the site)	Small to medium Short and long term	✓	Yes
Effects on internationally important nature conservation sites from pollution and increased water use	High (Internationally important nature conservation sites)	Negligible Long term	X	No
Effects on SSSIs from pollution and increased recreational use	High (SSSIs)	Negligible Long term	X	No
Effects on locally designated sites from pollution, disturbance and increased recreational use	Medium (Nearby LWSs)	Negligible Short and long term	X	No
Table 12.3: Natural heritage effects summary Notes: (1) Categories = high, medium, low, negligible (takes into account geographical level of importance) (2) Categories = large, medium, small, negligible (takes into account whether effect is short or long term)				

Proposed assessment methodology

- 12.17 The surveys discussed above will form the basis of the assessment, which will be undertaken in accordance with the Chartered Institute of Ecology and Environmental Management's (2018) *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine Version 1.2*. The assessment will be informed by the findings of other assessments where appropriate, including the lighting assessment. In order to facilitate consistency of assessment methodology throughout the ES, the method will be adapted to include consideration of the significance of effects by combining the importance of the identified receptors with the predicted magnitude of change, using a matrix.
- 12.18 Biodiversity net gain calculations will also be undertaken using the Defra Statutory Biodiversity Metric (Defra, 2024) to demonstrate how biodiversity net gain will be achieved as a result of the proposed development. All metric tables will be appended to the natural heritage chapter; a digital copy of the metric will also be provided.

13 Noise and vibration

Introduction

- 13.1 The proposed development has the potential to generate noise and vibration during site preparation and construction. Additional road traffic has the potential to increase noise levels during and post-construction. In addition to examining noise impacts associated with the proposed development on existing receptors in the locality, consideration is also given to the potential noise impacts experienced by future noise-sensitive uses created by the proposed development.

Currently known baseline

- 13.2 The main existing source of noise in the vicinity of the site is traffic on the local road network.

Potential significant effects

- 13.3 The initial identification of potential significant effects is set out in table 13.1.

Component	Potential construction effect?	Potential post-construction effect?	Comments
Construction noise	Yes	No	Generation of noise during site preparation and construction
Road traffic noise	Yes	Yes	Increased traffic noise during and post-construction
Operational noise	No	Yes	Generation of noise from fixed plant and servicing in the local retail centre
Vibration	Yes	Yes	Generation of vibration during site preparation and construction activities. Vibration impacts due to changes in traffic flows on existing roads near the site and on new roads created by the development

Table 13.1: Initial noise and vibration scoping checklist

- 13.4 The proposed development has the potential to generate noise as a result of site preparation and construction activities. Given the scale of the proposals and the proximity of residential properties to the north and north west, it is considered that there is the potential for a temporary effect. However, standard and proven best practice construction measures are set out in BS 5228:2009+A1:2014 *Code of practice for noise and vibration control on construction and open sites* to minimise temporary effects from construction noise. Such measures will be implemented through the CEMP that would be required by a planning condition attached to any consent, and no significant adverse effects are to be expected.
- 13.5 Construction traffic will be restricted to accessing the site from the A4 London Road through the implementation of a construction traffic management plan. The IEMA's (2023) *Institute of Environmental Management and Assessment (IEMA) Guidelines: Environmental Assessment of Traffic and Movement* state that, for a barely perceptible 1 dB change in traffic noise that will not be significant to occur, traffic flows need to increase by 25%. A potentially significant increase of 3 dB requires traffic flows to increase by 100%. Given the existing traffic levels on the A4 (see section 14), this is not likely to occur as a result of construction traffic. No significant adverse effects are therefore predicted.

- 13.6 Post-construction, the proposed development will also increase traffic on the local road network, particularly the A4 in the vicinity of the site and into the town. Given the existing traffic levels on the A4 (see section 14) and the size of the development, it is not likely that it would create sufficient traffic movements to lead to a perceptible increase in road traffic noise and no significant effects are predicted. However, a noise assessment will be submitted in support of the planning application, which will examine the impact of traffic flow changes on existing dwellings fronting the local road network in the vicinity of the site.
- 13.7 Future dwellings that occupy the site will experience noise from existing road infrastructure and additional noise due to changes in traffic flows on existing roads and additional road traffic on local roads within the development. However, it is considered that any noise impacts associated with such sources can be adequately controlled to avoid significant adverse effects (as required, as a matter of course, by paragraph 198 of the NPPF) through:
- Primary mitigation embedded within a design-led approach to the master planning of the development
 - Secondary mitigation, including the detailed setting out and engineering of proposed dwellings, which can be controlled as a reserved matter or through appropriate planning conditions
 - Tertiary mitigation that will be required as a matter of course to satisfy other regulatory regimes (e.g. design strategies required by Approved Documents F and O of the Building Regulations 2010 (as amended) regarding the appropriate provision of ventilation and overheating control, including appropriate consideration of noise)
- 13.8 Adherence to a good acoustic design process and implementation of the above mitigation strategies should enable internal noise levels within dwellings and external noise levels in amenity spaces to be effectively controlled to avoid any significant adverse noise effects from existing or future noise sources characterising the site. However, the noise assessment that will be submitted in support of the planning application will include information regarding the existing noise levels characterising the site, an assessment of noise impacts and any required mitigation in accordance with *ProPG: Planning and Noise: Professional Practice Guidance on Planning and Noise*⁽¹³⁾.
- 13.9 There is the potential for fixed plant and servicing activities associated with the proposed small local retail centre to generate noise effects at both existing dwellings in the vicinity and future dwellings within the development. However, such noise can be appropriately mitigated by the following:
- Primary mitigation embedded within a design-led approach to the master planning of the development (e.g. ensuring a sympathetic juxtaposition of noise-sensitive / noise-generating development)
 - Secondary mitigation, including engineering and management controls, determined in line with the recommendations of BS 4142:2014+A1:2019 *Methods for rating and assessing industrial and commercial sound*, which can be controlled through appropriate planning conditions

¹³ *ProPG: Planning and Noise: Professional Practice Guidance on Planning & Noise: New Residential Development* (2017), jointly published by Institute of Acoustics, Association of Noise Consultants and Chartered Institute of Environmental Health. This document is specifically referenced at paragraph 015: Reference ID: 30-015-20190722 of the government's Planning Practice Guidance: *Noise*.

- 13.10 As a result, no significant effects are expected from general operational noise. However, the noise assessment that will be submitted in support of the planning application will set out how such noise will be controlled.
- 13.11 BS 5228-2:2009+A1:2014 *Code of practice for noise and vibration control on construction and open sites – Vibration* makes reference to Transport Research Laboratory *Report 429*, which provides guidance regarding potential groundborne vibration caused by mechanical construction works. Figure 50 of the report indicates that ground vibration from miscellaneous vehicle operations on construction sites (including scrapers, rollers, dumpers, breakers, bulldozers and HGVs) is in the region of 1 mm/s peak particle velocity (PPV) at approximately 10 m, decreasing to the region of 0.1 mm/s PPV at approximately 50 m. Higher vibration levels can be generated by driven piling techniques; however, these are not likely to be required for the proposed development.
- 13.12 While actual vibration levels from construction works are dependent on several factors, including ground conditions, plant or vehicle size, the nature of the works (including the unlikely need for driven piling), the speed of HGV movements and the quality of surface of haul or other temporary roads, the majority of the existing residential receptors are well beyond such an initial screening distance. It is therefore expected that vibration levels at surrounding receptors would be generally limited to a negligible magnitude of impact, based on the criteria set out in BS 5228-2:2009+A1:2014, and the minimisation of vibration can be secured through the implementation of an appropriate CEMP. Any impacts are therefore likely to be consistent with a negligible to small, short term effect that is not significant in EIA terms and it is not anticipated that construction activities will lead to significant effects on vibration-sensitive receptors.
- 13.13 There are no existing sources of significant vibration, such as railways, in the vicinity of the site. An accompanying note to paragraph 1.4 of the Design Manual for Roads and Bridges guidance document *LA111 – Noise and Vibration (Rev. 2, 2020)* states that “*operational vibration is scoped out of the assessment methodology as a maintained road surface will be free from irregularities as part of the design project and under general maintenance, so operational vibration will not have the potential to lead to significant adverse effects.*” No significant effects are therefore predicted as a result of vibration associated with traffic flow changes within and around the proposed development site.
- 13.14 It is therefore proposed that noise and vibration are not scoped into the EIA and will not be considered in the ES.

Summary of noise and vibration effects

- 13.15 The findings of the scoping process in relation to noise and vibration effects are summarised in table 13.2, which confirms that there will not be a specific noise and vibration chapter in the ES.

Potential effect	Receptor importance / sensitivity ⁽¹⁾	Magnitude or scale of effect ⁽²⁾	Likely significant?	To be included in the EIA?
Generation of noise during site preparation and construction	Medium to high (Receptors adjacent to the site)	Negligible to small Short term	X	No
Increased traffic noise during construction	Medium to high (Receptors adjacent to the local road network)	Negligible Short term	X	No
Increased traffic noise post-construction	Medium to high (Receptors adjacent to the local road network)	Negligible Long term	X	No
Generation of fixed plant and servicing noise post-construction	Medium to high (Receptors adjacent to and within the site)	Negligible Long term	X	No
Effect of noise on future proposed dwellings	Medium to high (Future receptors within the site)	Negligible Long term	X	No
Generation of vibration during site preparation and construction	Medium to high (Receptors adjacent to the site)	Negligible to small Short term	X	No
Generation of vibration post-construction	Medium to high (Receptors adjacent to the site)	Negligible Long term	X	No
Table 13.2: Noise and vibration effects summary Notes: (1) Categories = high, medium, low, negligible (takes into account geographical level of importance) (2) Categories = large, medium, small, negligible (takes into account whether effect is short or long term)				

14 Traffic and transport

Introduction

- 14.1 The proposed development will lead to increased traffic on the local road network during and post-construction, which has the potential to lead to associated effects on pedestrian severance, driver and pedestrian delay and pedestrian amenity. There will also be an effect on the local road infrastructure, as the proposals include a new site access roundabout. Pedestrian and cycle links will be provided through the site, connecting to existing provisions on the local highway network.

Currently known baseline

- 14.2 The A4 London Road, which runs along the site's north eastern boundary, provides access to Chippenham town centre to the north west. From the town centre it runs westward to Bath and Bristol, while from the site it runs eastwards to Newbury, Reading, Slough and London. Annual average daily flows of 18,669 vehicles were estimated on the stretch of the A4 that runs past the site between the A4 Pewsham Way to the north and the A342 Devizes Road to the south in 2023⁽¹⁴⁾. Annual average daily flows of 25,456 vehicles were recorded on the stretch of the A4 that runs from Pewsham Way to the A420 in the town centre in 2023⁽¹⁵⁾.
- 14.3 There are bus stops on the A4 London Road adjacent to the site, which are served by the 55 gold bus between Chippenham and Swindon, the X10 bus between Cherhill and Sheldon / Hardenhuish, and the 33 / X33 bus between Chippenham and Devizes. Chippenham Railway Station, which is served by trains to Bath, Bristol, Swindon, Reading and London Paddington, is approximately 2.3 km to the north west of the site and can be accessed via the 55 gold bus or by cycling (an 11-minute journey time).
- 14.4 Public footpath CHIP16 runs through the west of the site and connects to public footpath CALW83 in the south, linking Pewsham to the north with the disused Pewsham Locks and wider countryside to the south.

Potential significant effects

- 14.5 The initial identification of potential significant effects is set out in table 14.1.

Component	Potential construction effect?	Potential post-construction effect?	Comments
Traffic flows and associated effects	Yes	Yes	Increased traffic during and post-construction
Road infrastructure	Yes	Yes	Construction of new access roundabout
Pedestrians and cyclist links / facilities	No	Yes	Creation of new pedestrian and cycle links
Public transport	No	Yes	Increased use of bus and rail services
Air traffic	No	No	There is no potential for effects on air traffic
Water traffic	No	No	There is no potential for effects on water traffic

Table 14.1: Initial traffic and transport scoping checklist

¹⁴ <https://roadtraffic.dft.gov.uk/manualcountpoints/77986>.

¹⁵ <https://roadtraffic.dft.gov.uk/manualcountpoints/91212>.

- 14.6 The IEMA's (2023) *Institute of Environmental Management and Assessment (IEMA) Guidelines: Environmental Assessment of Traffic and Movement* state that traffic flows need to change by 10% to have the potential for significant effects in areas with specifically sensitive receptors (such as schools, hospitals, recreational areas and places of worship) and 30% in other areas. There are some sensitive receptors along the A4 London Road in the vicinity of the site, including Stanley Park sports ground, Abbeyfield School and London Road cemetery, so a 10% threshold is considered appropriate.
- 14.7 There will be an increase in traffic flows on the local road network during construction, including a temporary increase in HGV movements. Construction traffic will access the site from the A4 London Road. Given the existing traffic levels on this road, a 10% increase in flows is not likely to occur as a result of construction traffic and no significant effects are predicted.
- 14.8 The proposed development will also increase traffic on the local road network post-construction, with an associated potential for effects on pedestrian severance, driver and pedestrian delay and pedestrian amenity, fear and intimidation. The scale of the proposed development and the presence of sensitive receptors in the area mean that this effect has the potential to be significant.
- 14.9 The proposed development will make changes to the local road infrastructure, including a new site access roundabout onto the A4 London Road. The new roundabout will need to be designed in accordance with relevant standards and will be subject to a stage 1 road safety audit. As a result, no significant effects are predicted on the local road infrastructure.
- 14.10 The proposals will create new pedestrian and cycle links through the site and there is also the potential for increased use of public transport services. As there are some existing congestion issues on the local road network, these effects have the potential to be significant.
- 14.11 While the proposed development will include the first phase of the wider strategic link road between the A4 and the A350, impacts associated with this road will only occur when the full road has been completed. These will therefore be examined in the cumulative effects assessment, as set out in section 17.

Summary of traffic and transport effects

- 14.12 The findings of the scoping process in relation to traffic and transport effects are summarised in table 14.2.

Potential effect	Receptor importance / sensitivity ⁽¹⁾	Magnitude or scale of effect ⁽²⁾	Likely significant?	To be included in the EIA?
Increased traffic generation during construction	Medium to high (Local road network and users)	Negligible Short term	X	No
Increased traffic generation post-construction	Medium to high (Local road network and users)	Small to medium Long term	✓	Yes
Changes to local road infrastructure	Low (Local road infrastructure)	Small Long term	X	No
Provision of new pedestrian and cycle links	Medium (Local pedestrian and cycle network)	Small to medium Long term	✓	Yes
Increased use of public transport	Medium (Local public transport network)	Small Long term	✓	Yes
Table 14.2: Traffic and transport effects summary Notes: (1) Categories = high, medium, low, negligible (takes into account geographical level of importance) (2) Categories = large, medium, small, negligible (takes into account whether effect is short or long term)				

Proposed assessment methodology

- 14.13 A transport assessment (TA), which will assess the impact of the proposed development on the capacity of highway infrastructure, will be scoped with Wiltshire Council and National Highways and will be submitted in support of the planning application. The EIA will summarise the findings of this, but will focus on environmental issues associated with potential increases in traffic flow and any consequent effects on the local community, such as severance, increased driver and pedestrian delay and changes to pedestrian fear / intimidation and amenity.
- 14.14 The assessment will take account of paragraphs 115 to 118 of the NPPF, the MHCLG's (2014) NPPG: *Travel plans, transport assessments and statements* and the IEMA's (2023) *Institute of Environmental Management and Assessment (IEMA) Guidelines: Environmental Assessment of Traffic and Movement*. Close consultation will be undertaken with key stakeholders, such as Wiltshire Council and National Highways.
- 14.15 A desk study and site visits will be undertaken to identify key features of the existing road and pedestrian / cycle networks in the vicinity of the site, obtain data on existing accident rates and identify existing public transport services. Traffic surveys are being undertaken at key junctions and links surrounding the site. It is proposed that trip generation will be estimated for the proposed development using sources such as the TRICS database and surveyed traffic flows, and predicted traffic flows and junction capacities will be modelled using appropriate software. The significance of traffic and transport effects on sensitive receptors will be determined by combining the sensitivity of identified receptors with the predicted magnitude of change, using a matrix.

15 Waste and natural resources

Introduction

- 15.1 Proposals for development should ensure that waste is reduced as much as possible and that, during the construction and post-construction phases of the proposals, waste arisings are either re-used or recycled where feasible. During construction, wastes should be correctly segregated to maximise re-use and recycling. Where any contaminated or hazardous arisings cannot be treated on site during remediation works, suitable disposal options should be identified as part of the environmental assessment process.
- 15.2 Natural resources are used in both construction of developments and by the occupants of the developments post-construction. The EIA Regulations require particular consideration to be given to the use of water, land, soil and biodiversity.

Currently known baseline

- 15.3 The existing quantities of waste generated on the site are not known, although these are likely to consist primarily of small quantities of agricultural waste.
- 15.4 In 2022/23, 222,726 tonnes of municipal waste were produced in Wiltshire, of which 20.7% was recycled, 15.4% was composted, 23.5% was sent for energy recovery, 24.5% was sent for mechanical biological treatment and 9.0% was sent to landfill, with the remainder re-used, reclaimed or sent for other treatment⁽¹⁶⁾. Up to date information is not available on the quantity of construction, demolition and excavation or commercial and industrial waste generated in Wiltshire.
- 15.5 Wiltshire Council and Swindon Borough Council's (2011) *Waste capacity gap report* shows that sufficient capacity is available to meet the area's demand for municipal and inert waste treatment and disposal capacity to the end of the current waste planning period in 2026, while additional capacity is required for commercial and industrial waste. Sufficient sites have subsequently been identified to provide this additional capacity.
- 15.6 Natural resources are currently used on the site for agriculture.

Potential significant effects

- 15.7 The initial identification of potential significant effects is set out in table 15.1.

Component	Potential construction effect?	Potential post-construction effect?	Comments
Demolition waste	No	No	No demolition is proposed
Waste management	Yes	Yes	Generation of waste during and post-construction that will require management
Natural resources	Yes	Yes	Natural resources will be used both in the construction of the proposed development and by the occupants post-construction

Table 15.1: Initial waste and natural resources scoping checklist

¹⁶ <https://wiltshire.gov.uk/article/4985/Where-does-your-waste-and-recycling-go>.

- 15.8 Waste arising from the site preparation and construction processes will require management. However, this will be managed in accordance with good practice to encourage waste minimisation, re-use and recycling where possible through the CEMP and the quantities involved are likely to be negligible in relation to existing waste generation and management in Wiltshire. Measures to minimise waste during construction will also be identified in the waste audit that will be submitted in support of the planning application, in accordance with local requirements. No significant effects are therefore predicted on the area's waste management infrastructure. As discussed in section 8, there are not likely to be high levels of contamination on the site, so it is not envisaged that significant quantities of contaminated spoil will require management / disposal.
- 15.9 The proposed development will lead to the generation of increased amounts of municipal waste and small quantities of commercial waste post-construction. However, measures to encourage post-development recycling will be set out in the waste audit that will be submitted in support of the planning application and the quantities involved are likely to be insignificant in relation to existing waste generation and management in Wiltshire. No significant effects are predicted on the area's waste management infrastructure.
- 15.10 The construction and occupation of the proposed development will use natural resources, including through land take, loss of soil resources and biodiversity to built development, and increased demand for potable water. However, as discussed in sections 9 and 16, the loss of agricultural land and soil resources and the increased water demand are not considered likely to be significant. Potentially significant effects as a result of habitat loss and creation are identified in section 12, but these will be examined in the natural heritage assessment and it is not considered appropriate to duplicate coverage here.
- 15.11 It is therefore proposed that waste and natural resources are not scoped into the EIA and will not be considered in the ES.

Summary of waste and natural resources effects

- 15.12 The findings of the scoping process in relation to waste and natural resources effects are summarised in table 15.2, which confirms that there will not be a specific waste and natural resources chapter of the ES. However, issues associated with habitat loss will be examined in the natural heritage chapter and waste generation and management will be considered in the waste audit.

Potential effect	Receptor importance / sensitivity ⁽¹⁾	Magnitude or scale of effect ⁽²⁾	Likely significant?	To be included in the EIA?
Generation of construction waste that requires management / disposal	Low (Local inert waste management facilities)	Negligible Short term	X	No
Generation of municipal and commercial waste that requires management / disposal	Low (Local municipal and commercial waste management facilities)	Negligible Long term	X	No
Use of natural resources – land and soil	Low to medium (Land and soils on the site)	Negligible Long term	X	No
Use of natural resources – biodiversity	Negligible to low (Habitats on the site)	Large Long term	✓	Yes – to be covered in the natural heritage chapter
Use of natural resources – water	Low to medium (Area's potable water supply)	Negligible to small Long term	X	No
Table 15.2: Waste and natural resources effects summary Notes: (1) Categories = high, medium, low, negligible (takes into account geographical level of importance) (2) Categories = large, medium, small, negligible (takes into account whether effect is short or long term)				

16 Water environment

Introduction

- 16.1 Potential effects on the water environment relate to increases in runoff associated with the increased impermeable area, and any associated effects on flood risk, groundwater recharge, and surface water and groundwater quality. There is also the potential for increases in demand for wastewater treatment and potable water supply as a result of the increase in population.

Currently known baseline

- 16.2 The site is in fluvial flood zone 1, although a small watercourse and several ditches flow alongside the hedgerows on site. The majority of the site is also at very low risk of surface water flooding, although there are areas of low to high risk in the east and south associated with the watercourse and adjacent to the farm access track⁽¹⁷⁾. The site lies within an area with no risk of groundwater flooding⁽¹⁸⁾. It does not lie within a groundwater source protection zone, drinking water safeguard zone or drinking water protected area. The site is underlain by bedrock classified as unproductive strata⁽¹⁹⁾.
- 16.3 Wessex Water's (2023) *WRMP24 Main Technical Plan* identifies that, while its previous 2019 Water Resources Management Plan forecasted a surplus of potable water supplies over demand up to 2045, the area is likely to have an overall deficit by 2079/80 unless interventions are made. The plan identifies a range of measures to address this, including the use of smart meters, water efficiency programmes, reducing leakage rates and investing in regional strategic resource options, such as effluent re-use and / or a new reservoir.
- 16.4 Chippenham Water Recycling Centre (WRC) lies approximately 1.8 km to the west of the site. Wessex Water's (2023) *Chippenham Drainage and Wastewater Strategy* identifies that the WRC is approaching capacity and that improvements will be required to ensure the WRC can accommodate forecasted increases in flows as a result of development in the area. It identifies a range of upgrades for the WRC, including quality enhancements to increase treatment to achieve a tightened phosphorus permit and capacity enhancements.

Potential significant effects

- 16.5 The initial identification of potential significant effects is set out in table 16.1.

¹⁷ <https://check-long-term-flood-risk.service.gov.uk>.

¹⁸ JBA Consulting, 2019, *Wiltshire Council Level 1 Strategic Flood Risk Assessment Data Explorer*.

¹⁹ <https://magic.defra.gov.uk/MagicMap/aspix>.

Component	Potential construction effect?	Potential post-construction effect?	Comments
Surface water quality	Yes	Yes	Pollution during construction and runoff from roads post-construction may affect surface water quality
Surface water hydrology	Yes	Yes	Increased runoff rates as a result of the increased impermeable area on the site
Surface water temperature	No	No	No processes are proposed that could change surface water temperature
Groundwater quality	No	No	The site is underlain by unproductive strata, so there is no potential for effects on groundwater quality
Groundwater hydrology / recharge	No	No	The site is underlain by unproductive strata, so there is no potential for effects on groundwater hydrology
Groundwater temperature	No	No	The site is underlain by unproductive strata, so there is no potential for effects on groundwater temperature
Coastal water quality	No	No	The site is not near the coast
Coastal water temperature	No	No	The site is not near the coast
Coastal processes / hydrodynamics	No	No	The site is not near the coast
Flood risk	Yes	Yes	Increased flood risk as a result of the increased impermeable area on the site
Availability of utility services	Yes	Yes	Increased demand for wastewater treatment and potable water supply

Table 16.1: Initial water environment scoping checklist

- 16.6 There is the potential for effects on the quality of the watercourse and ditches as a result of leaks / spills and sedimentation during construction, as well as for an increase in flood risk. However, standard and proven best practice construction measures, such as those set out in CIRIA (2001) *C532 Control of water pollution from construction sites. Guidance for consultants and contractors*, are available to minimise the potential for pollution and increased flood risk. Such measures will be implemented through the CEMP that would be required by a planning condition attached to any consent, and no significant adverse effects are predicted.
- 16.7 There is also the potential for pollution of the watercourse and ditches by contaminated road runoff post-construction. Surface water runoff from the proposed development will be managed through sustainable drainage systems (SuDS), including attenuation basins and swales, which will be required to include measures to provide surface water treatment in line with guidance such as CIRIA's (2015) *C753 The SuDS Manual*. The use of SuDS will ensure that there will be no significant adverse effects on surface water quality post-construction.
- 16.8 The proposed development has the potential to lead to increased flood risk elsewhere, in particular through an increase in impermeable area that could lead to increased runoff rates and an increased risk of surface water flooding. However, the proposed SuDS measures discussed above will control runoff rates and ensure that these effects will not be significant. The potential for adverse effects on ecological receptors as a result of hydrological changes is examined in section 12. A flood risk assessment (FRA) and drainage statement will be submitted in support of the planning application to address flooding and drainage, in accordance with national requirements.

- 16.9 The proposed development will increase demand for wastewater treatment and potable water supply. While Wessex Water has identified capacity issues at Chippenham WRC and potential long term water supply issues in the wider area, it has also planned for measures to address these. Given this, no significant effects are predicted on wastewater treatment or potable water supply. However, issues relating to wastewater treatment and drinking water supply will be addressed in the FRA and drainage statement and utilities statement respectively, which will be submitted in support of the planning application.
- 16.10 It is therefore proposed that the water environment is not scoped into the EIA and will not be considered in the ES.

Summary of water environment effects

- 16.11 The findings of the scoping process in relation to the water environment are summarised in table 16.2, which confirms that there will not be a specific water environment chapter in the ES. However, flooding, drainage and wastewater will be addressed in the FRA and drainage statement and potable water supply will be addressed in the utilities statement.

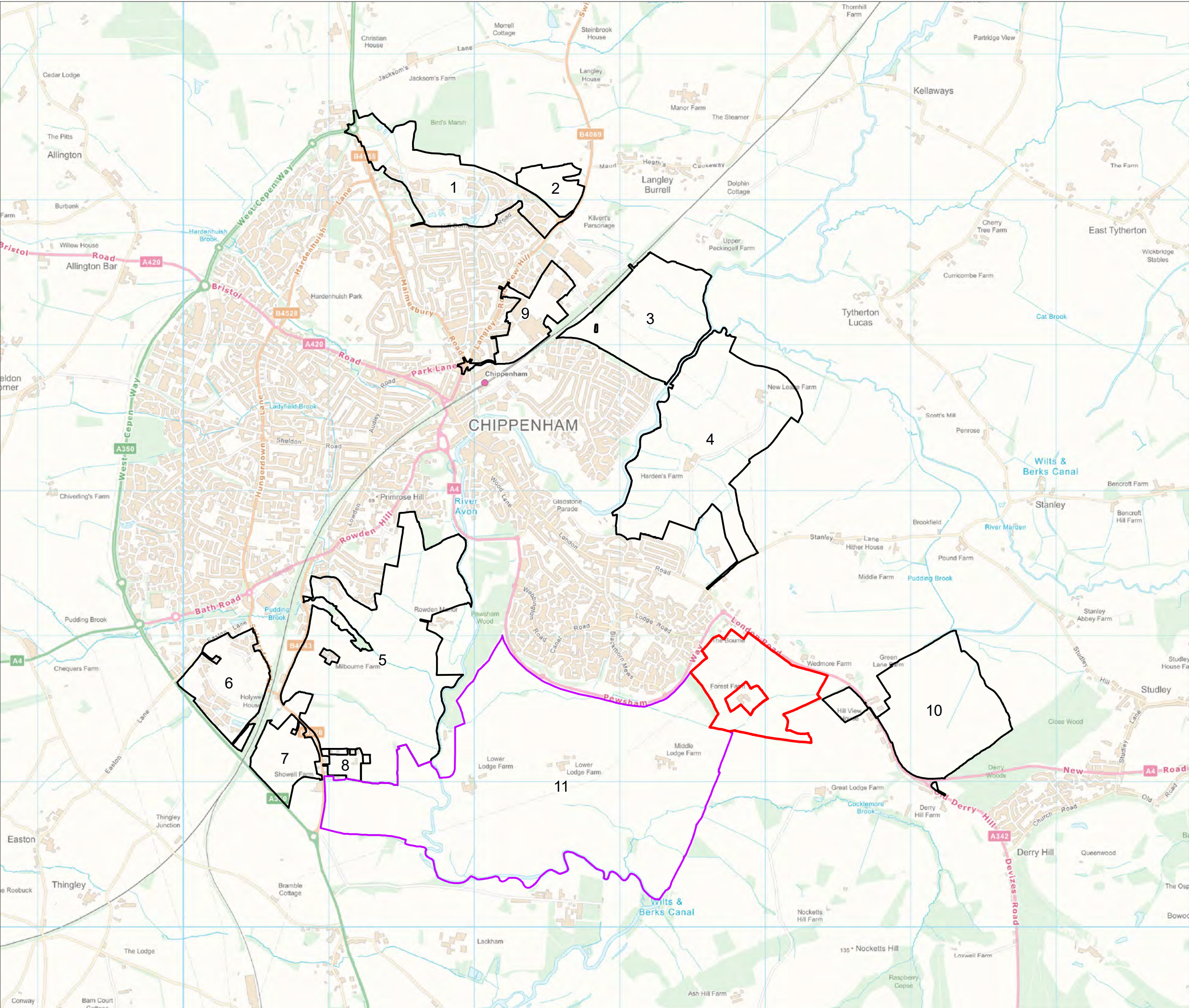
Potential effect	Receptor importance / sensitivity ⁽¹⁾	Magnitude or scale of effect ⁽²⁾	Likely significant?	To be included in the EIA?
Pollution of surface water during and post-construction	Low to medium (Watercourse and ditches on site)	Negligible Short and long term	X	No
Increased surface water runoff during and post-construction and associated increase in flood risk	Low to medium (Area's surface water hydrology)	Negligible Short and long term	X	No
Increased demand for wastewater treatment and potable water supply during and post-construction	Low to medium (Area's wastewater treatment and potable water supply)	Negligible to small Short and long term	X	No
Table 16.2: Water environment effects summary Notes: (1) Categories = high, medium, low, negligible (takes into account geographical level of importance) (2) Categories = large, medium, small, negligible (takes into account whether effect is short or long term)				

17 Cumulative effects and alternatives

Cumulative effects

- 17.1 The EIA Regulations require the consideration of the potential for cumulative effects with other existing and / or approved projects. Cumulative effects will be addressed on an issue-by-issue basis and the scope of the EIA will be expanded, if necessary, to include any cumulative issues that arise in the future. In particular, approved developments that have not yet been implemented and developments for which planning permission are currently being sought and that may be approved prior to the determination of the Forest Farm application will be included in the assessment.
- 17.2 As discussed in section 1, the Forest Farm site is part of the wider Land South of Chippenham and East of Showell Farm expansion to the south of Chippenham, as identified in policy 7 of Wiltshire Council's (2023) *Wiltshire Local Plan Pre-Submission draft 2020-2038 (Regulation 19)*. As the proposed development forms part of a wider allocation, it is considered that the EIA for the Forest Farm development will need to assess the potential for cumulative effects with the remainder of the allocation, including the completion of the strategic link road.
- 17.3 In addition to the consideration of the potential for cumulative effects with the remainder of the Land South of Chippenham and East of Showell Farm allocation, the potential for cumulative effects with the following developments will be assessed⁽²⁰⁾ (figure 6):
- Land at Rawlings Farm, Cocklebury Lane, Chippenham (application reference: 15/12351/OUT): up to 650 dwellings, 5 ha employment-generating space, a two-form entry primary school and up to 10 ha of new public open space, including a country park
 - Land at Showell Farm, Patterdown Road, Chippenham (application reference: N/13/00308/OUT): 50,000 m² of B1(b) (research and development), B1(c) (light industrial), B2 (general industrial) with ancillary B1(a) (office), and B8 (storage and distribution) with ancillary B1(a) employment development
 - Land at North Chippenham, Hill Corner Road, East of A350, Chippenham (application reference: N/12/00560/OUT): up to 750 dwellings, up to 12,710 m² of employment development (B1 / B2 / B8), a local centre (A1 (retail), D1 (non-residential institutions), D2 (assembly and leisure)), a primary school, woodland management facilities, a new link road and public open space (construction ongoing, 31 dwellings, primary school and employment floorspace remaining to be constructed as of April 2023)
 - Rowden Park, Patterdown Road, Chippenham (application reference: 14/12118/OUT): mixed use urban extension comprising up to 1,000 dwellings, one-form entry primary school, up to 400 m² retail convenience store, four shops up to 400 m² (A1-A5 (retail, financial and professional services, restaurants and cafés, drinking establishments and hot food takeaways)), community uses up to 700 m² (D1 and D2), and public open space including a riverside park, formal and informal

²⁰ Information on dwellings remaining to be constructed has been taken from Wiltshire Council's (November 2024) *Housing Topic Paper*, which is based on the *Housing Land Supply Statement*. Base Date: April 2023.



- Application site boundary
- Land South of Chippenham and East of Showell Farm remaining allocation
- Applications

- 1. Land at North Chippenham
- 2. Land East of Barrow Farm
- 3. Land at Rawlings Farm
- 4. Land East of Chippenham
- 5. Rowden Park
- 6. Land at Hunters Moon
- 7. Land at Showell Farm
- 8. Land at Showell Nurseries
- 9. Langley Park
- 10. Land at Forest Gate

Forest Farm, Chippenham
Gleeson Land

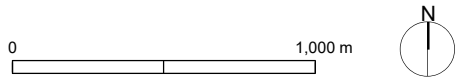


Figure 6: Developments to be considered in the cumulative effects assessment

Dwg no/227610/001	Revision	
02 April 2024	Drawn by: JC	Checked by: LT
Scale: 1:25,000 @A3		

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recreational facilities and allotments (construction ongoing, 952 dwellings and all other uses remaining to be constructed as of April 2023)

- Land at Hunters Moon, Chippenham (application reference: 16/12493/FUL): outline application for the demolition of existing buildings and structures and the development of up to 450 dwellings, up to 2.41 ha of employment (B1, B2 and B8) development and public open space and full application for 140 dwellings, 10 B1 employment units and public open space (construction ongoing, 195 dwellings and employment floorspace remaining to be constructed as of April 2023)
- Langley Park, Chippenham (application reference: 16/03515/OUT): demolition of existing buildings and redevelopment for up to 400 dwellings, a 69-bed hotel with up to 199 m² café, discount foodstore of up to 1,741 m² and up to 13,656 m² of B1, B2 and B8 floorspace (construction ongoing, 329 dwellings and employment floorspace remaining to be constructed as of April 2023)
- Land at Showell Nurseries, Chippenham (application reference: 17/08554/OUT): approximately 120 dwellings and public open space
- Land off the B4069 East of Barrow Farm, Langley Burrell, Chippenham (application reference: PL/2022/04681): up to 230 dwellings, a local centre comprising commercial business and service uses (Use Class E) with a gross internal area limit of 675 m², of which no more than 200 m² shall be used for retail (E(a)), drinking establishment and hot food takeaway (sui generis), and public open space
- Land at Chippenham Riverside / East of Chippenham (application reference: 15/12363/OUT): up to 1,500 dwellings including a retirement village, approximately 1 ha of land for a retirement home focused on New Leaze Farm, approximately 5 ha of employment land (B1 and B2), 2.1 ha of land safeguarded for a two-form entry primary school, a local centre focused on a mixed use refurbishment of Harden's Farm to provide A1, A2, A3, A4, B1, D1 and / or D2 Use Classes, 2.1 ha of land safeguarded for the expansion of Abbeyfield School, a new distributor road to the A4, land safeguarded for the construction of a branch to the Kennet and Avon Canal, and a 51 ha country / riverside park (application not yet determined)
- Land at Forest Gate, Pewsham, Chippenham (application reference: PL/2021/06112): development of a solar farm of up to 49.9 MW of generating capacity, comprising the installation of solar photovoltaic panels and associated infrastructure, including customer cabin, customer substation, DNO substation and equipment, inverter and transformer substations, spare part container, associated battery storage, access tracks, fencing and landscape planting

17.4 Consultees are requested to suggest projects that should be covered in the cumulative effects assessment. To ensure that the assessment is proportionate, it is proposed that only large scale developments should be included. Schedule 2 of the EIA Regulations should be used for guidance on the types of development that should be considered, such as developments of over 150 dwellings or more than 1 ha of non-residential development.

17.5 The potential for cumulative effects to arise through the interaction of two or more impacts on the same receptor will also be examined where applicable.

Alternatives

- 17.6 The ES will include details of alternatives considered by Gleeson Land and will set out the reasons for the selection of the proposed options.

18 Summary

- 18.1 From this scoping exercise, it has been possible to reach a preliminary view on the environmental features that are likely to be significantly affected by the proposed development and that should be included within the EIA. All the potential effects that are likely to be significant are listed in table 18.1.

Feature	Potential effects that are likely to be significant
Air quality	Road vehicle emissions post-construction
Community and social effects	Change to local population and demography
	Increased provision of market and affordable housing
	Increased demand for and provision of local facilities
Cultural heritage	Effect on archaeological remains on the site during construction
	Change to the settings of listed buildings in the vicinity of the site during and post-construction
	Change to the setting of the Derry Hill (Old) conservation area during and post-construction
	Change to the setting of the Bowood registered park and garden during and post-construction
Landscape and visual effects	Changes to land cover of the site
	Changes to landscape character of the site and effects on surrounding landscape character areas
	Changes to views from designated landscapes and townscapes
	Changes to other sensitive views, including from residential properties and public rights of way
Natural heritage	Loss of existing habitats and creation of new habitats on the site
	Effects on protected and priority species from habitat loss and disturbance during and post-construction
Traffic and transport	Increased traffic generation post-construction
	Provision of new pedestrian and cycle links
	Increased use of public transport
Table 18.1: Effects that are likely to be significant	

- 18.2 Although the environmental features are described here under separate headings, the EIA will pay close attention to the interrelationships of the various factors in order to assemble a holistic picture of the likely significant effects and mitigation measures. It should also be noted that EIA is an iterative process, enabling matters not recognised at a preliminary stage to be addressed subsequently.
- 18.3 Based on the preliminary scope determined within this report, the provisional ES chapters are envisaged to be as follows:

Non-technical summary

1. Introduction (including a statement outlining the relevant expertise and competence of the experts who contributed to the EIA)
2. Site description and development proposals (including alternatives considered)
3. Environmental issues and methodology
4. Air quality
5. Community and social effects
6. Cultural heritage
7. Landscape and visual effects
8. Natural heritage
9. Traffic and transport
10. Cumulative effects
11. Summary tables
12. Glossary

- 18.4 Each ES topic chapter will follow a similar format, including sections on guidance and legislation, methodologies, reporting the baseline conditions, discussion of the future baseline, impact assessment during and post-construction, mitigation and monitoring, and residual effects. The ES will include appropriate visual presentation materials (maps, diagrams and photographs) and will be supported by technical documents that will be supplied as appendices. At this stage, it is envisaged that the technical appendices will comprise the following:
- A. Scoping
 - B. Competent experts involved in the preparation of the ES
 - C. Air quality
 - D. Cultural heritage
 - E. Landscape and visual effects
 - F. Natural heritage
 - G. Traffic and transport
- 18.5 In addition, the planning application will be accompanied by the following standalone environmental reports:
- Air quality assessment
 - Energy and sustainability statement
 - Phase 1 geoenvironmental report
 - Agricultural land classification report
 - Lighting assessment
 - Arboricultural impact assessment
 - Biodiversity net gain assessment
 - Noise assessment
 - Travel plan
 - Flood risk assessment and drainage statement
 - Utilities statement
 - Waste audit
- 18.6 The consideration of the potential significant effects in this scoping report is preliminary. Wiltshire Council and consultees are invited to comment on the intended scope of the EIA and to highlight any likely significant issues they consider should be addressed in the EIA.

Appendix 2 – Scoping consultation responses



Lauren Tinkler
Technical Director
Tor & Co

Development Services
Wiltshire Council
Tel: 0300 456 0114
Email: developmentmanagement@wiltshire.gov.uk
www.wiltshire.gov.uk

16 April 2025

Dear Sir/Madam,

SCOPING OPINION

Town and Country Planning (Environmental Impact Assessment) Regulations 2017

APPLICATION REFERENCE:	PL/2025/02546
APPLICATION TYPE:	SCOPING OPINION
PROPOSAL	Request for a Scoping Opinion (600 dwellings)
SITE ADDRESS:	Forest Farm, Pewsham, Chippenham SN15 3RP
ON BEHALF OF:	Gleeson Land

Thank you for your request for a scoping opinion in relation to the Environmental Impact Assessment (EIA) for the above-mentioned proposal. Following careful consideration of the information provided, we are writing to provide you with the formal scoping opinion.

1. INTRODUCTION

This Scoping Opinion Report is issued by Wiltshire Council in response to the request for a Scoping Opinion submitted on behalf of Gleeson Land under Regulation 15 of the Environmental Impact Assessment (EIA) Regulations 2017. You have confirmed that the applicant has not previously submitted a Screening Opinion request and *“decided to proceed straight to scoping stage as a smaller scheme on part of the site had required EIA previously”*. Mindful of the requirements at regulation 15 I consider you to be a person who is minded to make an EIA application and I am responding in writing with an opinion as to the scope and level of detail of information to be provided within the environmental statement.

The purpose of this Scoping Opinion is to provide guidance on the key environmental issues and topics that should be assessed in the Environmental Impact Assessment (EIA) for the proposed development. The scoping process helps to identify the likely significant effects of the development on the environment and the scope of information that should be provided in the EIA.

In order to provide this opinion I have had regard to the information provided by you within your EIA scoping report dated March 2025 by tor & co. Your conclusion at paragraph 1.3 in relation to this being Schedule 2 development that has potential for likely significant environmental impacts individually or cumulatively with other development is agreed.

Furthermore, I have had regard to the consultation responses that I have received to date and included as appendices to this scoping opinion. Namely:

Appendix 1	Environment Agency consultation response
Appendix 2	Natural England consultation response
Appendix 3	Active Travel England consultation response
Appendix 4	Sport England consultation response
Appendix 5	Wiltshire Council's highway officer consultation response
Appendix 6	Wiltshire Council's landscape officer consultation response
Appendix 7	Wiltshire Council's urban design officer consultation response
Appendix 8	Wiltshire Council's public protection officer consultation response
Appendix 9	Wiltshire Council's public open space officer consultation response
Appendix 10	Wiltshire Council's archaeology officer consultation response
Appendix 11	Wiltshire Council's drainage officer
Appendix 12	Historic England consultation response
Appendix 13	Wiltshire Council's ecology officer response
Appendix 14	Wiltshire Council's conservation officer response

This is a list of the other consultations that have taken place, but for which no comments have been received to date:

- Police Liaison Officer
- Wessex Water
- Wiltshire Council's climate team
- Wiltshire Council's housing officer
- Wiltshire Council's rights of way officer
- Wiltshire Council's strategic planning officer

In the event that further comments are received these will be forwarded to you. You should have regard to them in the development of your Environmental Statement.

As the submission for a scoping opinion is a prelude to a likely planning application for development of a site which is part of a wider allocation in the emerging Local Plan, it is important to take this early opportunity to emphasise that the emerging Local Plan envisages a “single comprehensive masterplan, phasing and delivery strategy for the development... prepared and approved by the Council in advance of any planning application being submitted for the whole or part of the allocated site”. Furthermore, it is envisaged that this will be prepared in consultation with the local community and the local planning authority. Additionally, any “planning applications must be in accordance with the approved masterplan”. Whilst this scoping opinion is necessary because of your request for it, it's the Council's position that any proposal must be part of a comprehensive masterplan.

2. DEVELOPMENT DESCRIPTION AND CONTEXT

The proposed development is located to the south-east of Chippenham / Pewsham adjacent to the established built form and settlement boundary. You state that it involves the provision of up to 600 dwellings, including a proportion of affordable housing, a small retail centre, and public open space. Furthermore, you state that the proposal will include the first phase of the strategic link road that forms

part of the wider allocation (ref: emerging Wiltshire Local Plan Review), including a new site (vehicular) access roundabout on the A4. Additionally, you state that pedestrian and cycle links will be created through the site (and presumably new access points), the existing farm access will be reconfigured, and associated works including drainage and landscaping are included. Also, although not development, you state that the existing public footpaths through the site will be retained.

The development is proposed on a site that is open countryside, grade 3 agricultural land within the Avon Vales landscape character area. As you highlight, rights of way dissect the site. I also note that the Wilts & Berks Canal Main Line runs through the southern edge of the application area. There are heritage and ecological interests relevant to the site and surrounding environment too. I can see records relating to ground/surface water flooding susceptibility and also some potential sources of contamination including apparent manufacturing of clay bricks and tiles, unknown filled ground (most likely the route of the canal) and pipelines (GPSS/6 and GPSS/8).

Relevant planning history for part of the site includes:

15/11153/OUT – Mixed Use Development including the construction of up to 200 dwellings including affordable housing, B1 employment, Community Building, Creation of New Vehicular Access, Footways, Cycleways and Bus Stop Lay-bys, Ancillary Road Infrastructure, Public Open Space, Children's Play Areas, Landscaping, Pumping Station and Surface Water Attenuation Facilities – Refused and subsequently dismissed at appeal on 22 June 2017

3. PLANNING POLICY AND LEGISLATION CONTEXT

The following key policies, legislation, and guidance documents are relevant to the preparation of the Environmental Impact Assessment (EIA) for the proposed development:

- The Town and Country Planning Act 1990 (TCPA 1990)
- Environmental Impact Assessment (EIA) Regulations 2017
- National Planning Policy Framework (NPPF)
- Planning Practice Guidance (PPG)
- Wiltshire Core Strategy (2015)
- Calne Community Neighbourhood Plan 2 2023-2038 Made March 2025
- Chippenham Neighbourhood Plan 2023-2038 Made May 2024

Other Relevant Legislation: The scoping opinion should also refer to any specific legislation or guidance that may apply to the development, such as:

- The Conservation of Habitats and Species Regulations 2017 (for European protected species and habitats).
- The Wildlife and Countryside Act 1981 (for national protected species).
- The Flood and Water Management Act 2010 (for flood risk and management).
- The Climate Change Act 2008 (for carbon emissions considerations).
- The Air Quality Standards Regulations (2010).

4. SCOPE OF THE ENVIRONMENTAL IMPACT ASSESSMENT

As required by legislation, before adopting this scoping opinion, the following matters have been taken into account:

- a) Any information provided by the applicant about the proposed development;
- b) The specific characteristics of the particular development;
- c) The specific characteristics of development of the type concerned; and
- d) The environmental features likely to be significantly affected by the development

Once an authority has adopted a scoping opinion this does not preclude it from requiring of the person who made the scoping opinion additional information in connection with any statement that may be submitted by that person as an environmental statement in connection with an application for planning permission.

Cumulative impacts: The EIA scoping report provides a good starting point for assessing the environmental impacts from the proposed development. What it is hard to address at this stage are the cumulative impacts across the emerging wider strategic allocation. With some environmental constraints – arguably most notably traffic (and transport links), drainage, ecology, air quality and heritage – these are likely to be far more significant than when considering this proposal independently. It is essential that the Environmental Statement makes a full and robust assessment of cumulative impacts of the emerging wider allocation and its pressures on infrastructure and the environment, especially as the Local Plan Review progresses through examination.

Table 18.1 provides a useful summary of your starting point on what the likely significant environmental impacts of the development are going to be. It is key to consider this a starting point because this scoping opinion and the consultation responses from various stakeholder experts will help you to develop your thinking by providing further opinion and local context. Please do read all of the consultation responses provided here with some care and take a precautionary approach to scoping matters into the Environmental Statement mindful of cumulative impacts from the emerging site allocation. This is important because the latest housing numbers for Wiltshire mean that we can expect significant housing growth in the future.

The approach to cumulative impacts at paragraph 17.1 needs to be explicitly more inclusive of this. It will not be adequate to only consider approved development or development for which planning permission is currently being sought and may be approved prior to your scheme. This approach is unlikely to properly assess *likely* significant cumulative environmental impacts. The broader approach set out at paragraphs 17.2 and 17.3 is proportionate, and it is encouraging and aligns better with how Natural England put this as *plans and projects which are reasonably foreseeable i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development....*

A preferred approach would be for EIA to accompany a project/(application) encompassing the entire emerging LP site allocation rather than small parts.

To aid the evolution of your preliminary views as you begin working on your EIA submission and Environmental Statement, please note the following specific comments and all the consultation responses included as appendices.

Landscape and Visual Impact: Your preliminary view has already scoped in landscape and visual impacts. This is agreed. The EIA should assess the potential effects of the development on the character and quality of the landscape and views. Please have particular regard to the comments of the council's landscape officer. You will note the suggestions to include 'landscape fabric' within scope and the observations on a slight expansion to the viewpoints that need to be assessed. You will also note the concern already expressed in relation to cumulative impacts and to take a robust assessment of this,

the scope of assessment and viewpoints will need to be expanded in order to address the approach you set out at paragraphs 17.2 and 17.3.

Ecology and Biodiversity: Your preliminary view has already scoped in ecology and biodiversity (natural heritage) impacts. This is agreed. The EIA should assess potential impacts on local biodiversity, including habitats and protected species. Specific surveys will be required for the site itself and must be up to date in order to allow a robust assessment at the point of determination. Please have particular regard to the ecology officer comments in this regard. Again, cumulative issues here are a matter that will need careful attention, and the natural environment features likely to be impacted here do not work in isolation at this site alone. These are not static factors either, so this consideration has a very strong temporal factor beyond the confines of the site. It is clear from the concept plan within the emerging site allocation policy that this site has been envisaged as key to providing improved habitat creation, which supports the case for expanding survey work.

Air Quality: Your preliminary view has already scoped in air quality impacts. This is agreed. Your initial reasoning has a focus on the impacts from road vehicles noting the nearby air quality management area in Calne. A related factor that needs to be considered is the implications of this development being delivered without a completed distribution route between the A4 and A350 to the south of Chippenham. Without prejudice to any “masterplan, phasing and delivery strategy” for the emerging allocation an incomplete distribution route is more than ‘likely’. Furthermore, it is a matter that needs to be taken further with the potential for wider strategically planned development also not producing a distributor road and finding alternative means of access. The consequences of this would likely be very significant over and above the impact you have provisionally identified. It would reach far beyond the impact to the Calne AQMA. This type of scenario should be manageable through delivery of well-planned (and masterplanned) development; however, it is important that the Environmental Statement addresses such potential effects, albeit proportionately to the likelihood of them occurring. Please note the comments provided by environmental protection colleagues here.

Noise and Vibration: This has been scoped out in your provisional assessment. That does not mean that it is not an important planning consideration that will not need to be assessed in any planning application. Furthermore, assessment will require information from you and the comments from colleagues in environmental protection will assist you further in determining how to proceed. These focus around managing noise during the construction and operational phases.

Transport and Accessibility: The EIA should include a Transport Assessment as you have indicated in scoping this within the Environmental Statement. This needs to evaluate the effects of the development on the transport network. This should include potential impacts on traffic flow, road safety, public transport, and walking and cycling infrastructure. These are all issues you have already identified and are working towards. Please also note my comments above in relation to air quality and the scope of cumulative assessment work. The impacts on transport on air quality need to be considered similarly in terms of wider implications of increased traffic generation post-construction with or without the provision of a distribution route.

Flood Risk and Drainage: You have not scoped these issues into your EIA work to date. You are directed to the responses received from drainage colleagues and the Environment Agency. These identify issues of surface water flooding at the site associated with a ditch (ordinary watercourse) feature and that the ground conditions indicate that infiltration is not a feasible means of discharge on the site. Singularly this may reasonably facilitate a conclusion that the proposal would not likely have a significant

environmental impact. However, this is part of a wider strategic allocation and the cumulative impacts of addressing drainage and waste water in the context of what Wiltshire Council have acknowledged to be a climate emergency poses greater concern. At this stage, exercising a precautionary approach in light of the limited information about cumulative impacts on this issue, then this is currently considered to be a matter that should be scoped into the EIA and form a chapter within the Environmental Statement rather than just a standalone report.

The EIA should assess flood risk at the site and surrounding areas, including whether the development falls within a flood zone and any necessary mitigation measures. The drainage strategy should be reviewed to ensure adequate capacity and flood prevention measures in terms of all sources of flood risk and management of foul flows as well.

Cultural Heritage: You have scoped in the potential impact of the development on heritage assets, including archaeology, listed buildings, conservation areas, and historic park and gardens. This conclusion is agreed. You have also considered scheduled monuments and the loss of the historic landscape character.

However, there is a case for widening the scope on cultural assets considering the cumulative effect of the wider allocation on the historic landscape character. It is noted that there is no mention of the Wilts & Berks canal route that would be impacted by this proposal. Moreover, a feature here is the agricultural land management which is expressed through features such as farm steads set within open countryside. You are advised to have further regard to the potential for significant environmental impacts to this historic landscape character, especially through the lens of cumulative impacts with the wider emerging strategic allocation. There is clear synergy here with the work on landscape impacts. Furthermore, this is a theme raised by Historic England in their comments regarding non-designated heritage assets and use of photomontages as useful techniques. Additionally, you should note the views on the council's in-house conservation officer. They are seeking an expansion of the scoping work around heritage.

Climate Change and Sustainability: It is necessary to consider both climate change mitigation and climate change adaptation. Given the scale of development proposed, even if taken cumulatively, the scale and magnitude of greenhouse gas emissions globally that influence climate change mitigation are such that the impact here is not likely to be 'significant'. However, it remains an imperative that the development is planned in such a way to ensure that both embodied and operational carbon is minimised in accordance with the net zero 2050 timelines. You have mentioned only addressing operational carbon, so you need in any standalone reports to cover both areas within a whole-lifetime carbon assessment that accords with RICS standards.

Turning to climate change adaptation. The impacts of climate change have a degree of uncertainty, but it is likely we will experience greater storm events, increased temperatures, wildfires, and increased wind speeds. A development such as this will need to be able to cope with overheating, water scarcity and flooding. There is the potential for likely significant environmental impacts here especially in relation to flood risks. On balance it is acceptable to address climate change adaptation as a theme across the Environmental Statement (as indicated at paragraph 5.19 of the submitted Scoping Report), with a focus on sections like Flood Risk and Drainage where impacts are likely to be most relevant. However, please have regard to the comments from the Environment Agency and urban design officer on this point as you develop your Environmental Statement.

Health and Wellbeing: The EIA should consider the potential effects of the development on local health and wellbeing, including as you have scoped-in, increased demand for local facilities (such as education, health services, employment, and amenity and nature spaces); and impacts specific to health and wellbeing impacts around air quality and noise. Regard needs to also be had to potential for odours and nuisance from Wessex Water infrastructure, although this is not likely to be a significant environmental effect on this part of the emerging allocation so much as it will be on other parcels.

Waste and Natural Resources: Please note the comments above in terms of whole-life carbon assessments and consider this in relation to the use of natural resources. This is the best means to plan a development to ensure minimal use of natural resources taking a whole life-cycle approach. Additionally, it is noted that the proposal involves a minority of land that is classed as best and most versatile agricultural land. However, the impact is not considered to be significant in the meaning of EIA. Your initial scoping out of issues in this regard is agreed, but please have regard to the various consultation responses relevant to this.

5. CONCLUSION

Based on the scoping process and the relevant planning policies and legislation outlined in this report, the applicant should ensure that the EIA comprehensively addresses the key environmental issues already identified within their EIA Scoping Report. It is noted that these are preliminary findings and as such hopefully these comments and the consultation responses appended to this will help further inform the production of the Environmental Statement.

In summary particular attention is drawn to the following matters over and above the conclusions you have initially drawn:

- Cumulative impacts and widening the scope of this to ensure compliance with your own points at paragraphs 17.2 and 17.3 to address the effects of *plans and projects which are reasonably foreseeable i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development....i.e. the emerging Local Plan Review site allocation.*
- Additional coverage in relation to landscape and visual impacts e.g. including scoping of landscape fabric and expansion of potential viewpoints.
- In terms of ecology and the natural environment scoping needs to increase to better ensure the use of up to date information and acknowledgement that impacts are likely to extend beyond the site boundaries into land where development can be foreseen.
- In terms of air quality, highways and greenhouse gas emissions the potential impacts arising from development need to be scoped in. Furthermore, scoping in the impacts from this without a completed distribution route between the A4 and A350 and with cumulative impacts of reasonably foreseeable development will be necessary.
- Flood Risk and Drainage are areas that are likely to need to be scoped into the Environmental Statement in light of local information, more robust consideration of cumulative impacts and the need to adapt to our changing climate.
- Cultural Heritage considerations are within scope, but this needs to be expanded to include non-designated heritage assets when considering the cumulative impact from the emerging Local Plan Review allocation and the overall area affected by the change in rural character.

It is trusted that the scoping opinion provided here guides you in ensuring that the EIA is robust and adequately covers all areas of likely significant environmental concern. Furthermore, that the need for additional emphasis on cumulative impacts and more assessment in that regard is noted. The LPA will

expect to receive a detailed EIA in due course, addressing these issues and incorporating any feedback received from the consultees.

Yours faithfully

Head of Development Management

Appendix 1 – Environment Agency consultation response

Mr James Taylor
Wiltshire Council
Development Services Central
County Hall
Bythesea Road
Trowbridge
Wiltshire
BA14 8JN

Our ref: WX/2025/138817/01-L01
Your ref: PL/2025/02546
Date: 27 March 2025

Dear Mr Taylor

EIA REQUEST FOR SCOPING OPINION (600 DWELLINGS) INC LOCAL RETAIL CENTRE, PUBLIC OPEN SPACE AND THE FIRST PHASE OF THE ROAD CORRIDOR

FOREST FARM, PEWSHAM, CHIPPENHAM

Thank you for consulting the Environment Agency on the above screening/scoping opinion.

We believe that the proposed development could be considered under Schedule 2 of the EIA Regulations. However, we do not believe that the scope of these works is likely to impact on a sensitive area that falls within our remit as defined under the Regulations.

Irrespective of your decision on the need for an EIA the following areas are considered necessary to include within the planning submission:

- Water supply (resources) and water efficiency
- Waste water (foul drainage)
- Groundwater protection (from pollution)
- Impact on protected species and habitat
- Construction Environment Management Plan, including pollution prevention measures
- Waste management

NOTES TO LPA / APPLICANT

Water Supply and Wastewater

Adequate water and wastewater infrastructure is needed to support sustainable development. National Planning Policy Framework identifies that a healthy water environment will also deliver multiple benefits, such as helping to enhance the natural environment generally and adapting to climate change.

The National Planning Policy Framework Planning Practice Guidance states that when drawing up wastewater treatment proposals for any development, the first presumption is to provide a system of foul drainage discharging into a public sewer to be treated at a public sewage treatment works (those provided and operated by the water and sewerage companies). This should be done in consultation with the sewerage company of the area.

Where a connection to a public foul sewer is not feasible (in terms of cost and/or practicality) a package sewage treatment plant can be considered. The package sewage treatment plant should offer treatment so that the final discharge from it meets the standards set by the required Environment Agency Environmental Permit.

A proposal for a package sewage treatment plant and infrastructure should set out clearly the responsibility and means of operation and management to ensure that the permit is not likely to be infringed during the life of the plant.

Sustainable Construction

Sustainable design and construction should be implemented across the proposed development. This is important in limiting the effects of and adapting to climate change. Running costs for occupants can also be significantly reduced.

Biodiversity

The National Planning Policy Framework is clear that pursuing sustainable development includes moving from a net loss of biodiversity to achieving net gains for nature, and that a core principle for planning is that it should contribute to conserving and enhancing the natural environment and reducing pollution.

Information on biodiversity impacts and opportunities should inform all stages of development including, for instance, site selection and design including any pre-application consultation as well as the application itself.

Groundwater Protection / Contaminated Land

If historic use of the site may have caused contamination, then National Planning Policy Framework (NPPF) paragraph 109 states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to, or being put at risk from, unacceptable levels of water pollution. Government policy also states that planning policies and decisions should ensure that adequate site investigation information, prepared by a competent person, is presented.

Further guidance on what should be contained in the assessment and issues associated with groundwater protection can be found here - [Groundwater protection - GOV.UK](https://www.gov.uk/government/consultations/groundwater-protection)

Pollution Prevention during Construction

Safeguards should be implemented during the construction phase to minimise the risks of pollution from the development. Such safeguards should cover:

- the use of plant and machinery
- silt management
- oils/chemicals and materials
- wheel washing and dirty water disposal
- the use and routing of plant and vehicles
- the location and form of work and storage areas and compounds

- the control and removal of spoil and wastes.

Waste

Should this proposal be granted planning permission, then in accordance with the waste hierarchy, we wish the applicant to consider reduction, reuse and recovery of waste in preference to offsite incineration and disposal to landfill during site construction.

Yours sincerely

Ms Ellie Challans
Sustainable Places - Planning Specialist
02030 259311
wx.sp@environment-agency.gov.uk

Appendix 2 – Natural England consultation response

Date: 19 March 2025
Our ref: 506718
Your ref: PL/2025/02546



Mr James Taylor
Wiltshire Council
BY EMAIL ONLY
Developmentmanagement@wiltshire.gov.uk

Consultations
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 900

Dear Mr Taylor

Environmental Impact Assessment Scoping consultation (Regulation 15 (4) of the Town and Country Planning EIA Regulations 2017): Request for Scoping Opinion (600 dwellings)
Location: Forest Farm, Pewsham, Chippenham, SN15 3RP

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 17 February 2024, received on 17 February 2024.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

A robust assessment of environmental impacts and opportunities based on relevant and up to date environmental information should be undertaken prior to a decision on whether to grant planning permission. Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development.

Further guidance is set out in Planning Practice Guidance on [environmental assessment, natural environment and climate change](#).

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

Please note that Natural England must be consulted on Environmental Statements.

Please send any new consultations or further information on this consultation to consultations@naturalengland.org.uk.

Yours sincerely

Chloe Lancaster
Consultations Team

Annex A – Natural England Advice on EIA Scoping

General Principles

[Schedule 4](#) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, sets out the information that should be included in an Environmental Statement (ES) to assess impacts on the natural environment. This includes:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc.) resulting from the operation of the proposed development
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen
- A description of the aspects of the environment likely to be significantly affected by the development including biodiversity (for example fauna and flora), land, including land take, soil, water, air, climate (for example greenhouse gas emissions, impacts relevant to adaptation, cultural heritage and landscape and the interrelationship between the above factors
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium, and long term, permanent and temporary, positive, and negative effects. Effects should relate to the existence of the development, the use of natural resources (in particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment
- A non-technical summary of the information
- An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information

Further guidance is set out in Planning Practice Guidance on [environmental assessment](#) and [natural environment](#).

Cumulative and in-combination effects

The ES should fully consider the implications of the whole development proposal. This should include an assessment of all supporting infrastructure.

An impact assessment should identify, describe, and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment (subject to available information):

- a. existing completed projects;
- b. approved but uncompleted projects;
- c. ongoing activities;
- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
- e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

Environmental data

Natural England is required to make available information it holds where requested to do so. National datasets held by Natural England are available at <http://www.naturalengland.org.uk/publications/data/default.aspx>.

Detailed information on the natural environment is available at www.magic.gov.uk.

Natural England's SSSI Impact Risk Zones are a GIS dataset which can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the [Natural England Open Data Geoportal](#).

Natural England does not hold local information on local sites, local landscape character, priority habitats and species or protected species. Local environmental data should be obtained from the appropriate local bodies. This may include the local environmental records centre, the local wildlife trust, local geo-conservation group or other recording society.

Biodiversity and Geodiversity

General principles

The [National Planning Policy Framework](#) (paragraphs 192-196) sets out how to take account of biodiversity and geodiversity interests in planning decisions. Further guidance is set out in Planning Practice Guidance on the [natural environment](#).

The potential impact of the proposal upon sites and features of nature conservation interest and opportunities for nature recovery and biodiversity net gain should be included in the assessment.

Ecological Impact Assessment (EclA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. [Guidelines](#) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).

Local planning authorities have a [duty](#) to conserve and enhance biodiversity as part of their decision making. Conserving biodiversity can include habitat restoration or enhancement. Further information is available [here](#).

Designated nature conservation sites

The proposal is unlikely to adversely impact any European or internationally designated nature conservation sites (including 'habitats sites' under the NPPF) or nationally designated sites (Sites of Special Scientific Interest, National Nature Reserves or Marine Conservation Zones).

Regionally and Locally Important Sites

The ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. Local Sites are identified by the local wildlife trust, geoconservation group or other local group and protected under the NPPF (paragraph 192 and 193). The ES should set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks. Contact the relevant local body for further information.

Protected Species

The conservation of species protected under the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017 is explained in Part IV and Annex A of Government Circular 06/2005 [*Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System*](#).

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area.

The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.

Natural England has adopted [standing advice](#) for protected species, which includes guidance on survey and mitigation measures. A separate protected species licence from Natural England or Defra may also be required.

District Level Licensing for Great Crested Newts

District level licensing (DLL) is a type of strategic mitigation licence for great crested newts (GCN) granted in certain areas at a local authority or wider scale. A [DLL scheme for GCN](#) may be in place at the location of the development site. If a DLL scheme is in place, developers can make a financial contribution to strategic, off-site habitat compensation instead of applying for a separate licence or carrying out individual detailed surveys. By demonstrating that DLL will be used, impacts on GCN can be scoped out of detailed assessment in the Environmental Statement.

Priority Habitats and Species

Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Lists of priority habitats and species can be found [here](#). Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to [download](#). Further information is also available [here](#).

An appropriate level habitat survey should be carried out on the site, to identify any important habitats present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present.

The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys)
- Additional surveys carried out as part of this proposal
- The habitats and species present

- The status of these habitats and species (e.g. whether priority species or habitat)
- The direct and indirect effects of the development upon those habitats and species
- Full details of any mitigation or compensation measures
- Opportunities for biodiversity net gain or other environmental enhancement

Ancient Woodland, ancient and veteran trees

The ES should assess the impacts of the proposal on any ancient woodland, ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement.

Natural England maintains the Ancient Woodland [Inventory](#) which can help identify ancient woodland. The [wood pasture and parkland inventory](#) sets out information on wood pasture and parkland.

The [ancient tree inventory](#) provides information on the location of ancient and veteran trees.

Natural England and the Forestry Commission have prepared [standing advice](#) on ancient woodland, ancient and veteran trees.

Biodiversity net gain

Paragraph 193 of the NPPF states that decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

Biodiversity Net Gain is additional to statutory requirements relating to designated nature conservation sites and protected species.

Proposals for mandatory biodiversity net gain should be in line with the Environment Act 2021 and supporting regulations. Further information on biodiversity net gain, including [draft Planning Practice Guidance](#), can be found [here](#)

The statutory [biodiversity metric](#), together with ecological advice, should be used to calculate the change in biodiversity resulting from proposed development and demonstrate how proposals can achieve a net gain.

The metric should be used to:

- assess or audit the biodiversity unit value of land within the application area
- calculate the losses and gains in biodiversity unit value resulting from proposed development
- demonstrate that the required percentage biodiversity net gain will be achieved

Biodiversity Net Gain outcomes can be achieved on site, off-site or through a combination of both. On-site provision should be considered first. Delivery should create or enhance habitats of equal or higher value. When delivering net gain, opportunities should be sought to link delivery to relevant plans or strategies e.g. Green Infrastructure Strategies or Local Nature Recovery Strategies.

Opportunities for wider environmental gains should also be considered.

Landscape

Landscape and visual impacts

The environmental assessment should refer to the relevant [National Character Areas](#). Character area profiles set out descriptions of each landscape area and statements of environmental opportunity.

The ES should include a full assessment of the potential impacts of the development on local landscape character using [landscape assessment methodologies](#). We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.

A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology set out in *Guidelines for Landscape and Visual Impact Assessment 2013* ((3rd edition) produced by the Landscape Institute and the Institute of Environmental Assessment and Management. For National Parks and AONBs, we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping stage.

To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the [National Design Guide](#) and [National Model Design Code](#). The ES should set out the measures to be taken to ensure the development will deliver high standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.

Heritage Landscapes

The ES should include an assessment of the impacts on any land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific, or historic interest. An up-to-date list is available at www.hmrc.gov.uk/heritage/lbsearch.htm.

Connecting People with nature

The ES should consider potential impacts on access land, common land, public rights of way and, where appropriate, the England Coast Path and coastal access routes and coastal margin in the vicinity of the development, in line with NPPF paragraph 105. It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways, and bridleways. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Access to nature within the development site should also be considered, including the role that natural links have in connecting habitats and providing potential pathways for movements of species.

Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

Soils and Agricultural Land Quality

Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil resources are protected and sustainably managed. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered in line with paragraphs 187 and 188 of the NPPF. Further guidance is set out in the Natural England [Guide to assessing development proposals on agricultural land](#).

As set out in paragraph 223 of the NPPF, new sites or extensions to sites for peat extraction should not be granted planning permission.

The following issues should be considered and, where appropriate, included as part of the Environmental Statement (ES):

- The degree to which soils would be disturbed or damaged as part of the development
- The extent to which agricultural land would be disturbed or lost as part of this development, including whether any best and most versatile (BMV) agricultural land would be impacted.

This may require a detailed Agricultural Land Classification (ALC) survey if one is not already available. For information on the availability of existing ALC information see www.magic.gov.uk.

- Where an ALC and soil survey of the land is required, this should normally be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres. The survey data can inform suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space).
- The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design/masterplan.
- The ES should set out details of how any adverse impacts on soils can be avoided or minimised and demonstrate how soils will be sustainably used and managed, including consideration in site design and master planning, and areas for green infrastructure or biodiversity net gain. The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise off-site impacts.

Further information is available in the [Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites](#) and The British Society of Soil Science Guidance Note [Benefitting from Soil Management in Development and Construction](#).

Air Quality

Air quality in the UK has improved over recent decades but air pollution remains a significant issue. For example, approximately 85% of protected nature conservation sites are currently in exceedance of nitrogen levels where harm is expected (critical load) and approximately 87% of sites exceed the level of ammonia where harm is expected for lower plants (critical level of 1µg) ^[1]. A priority action in

^[1] [Report: Trends Report 2020: Trends in critical load and critical level exceedances in the UK - Defra, UK](#)

the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The Government's Clean Air Strategy also has a number of targets to reduce emissions including to reduce damaging deposition of reactive forms of nitrogen by 17% over England's protected priority sensitive habitats by 2030, to reduce emissions of ammonia against the 2005 baseline by 16% by 2030 and to reduce emissions of NO_x and SO₂ against a 2005 baseline of 73% and 88% respectively by 2030. Shared Nitrogen Action Plans (SNAPs) have also been identified as a tool to reduce environmental damage from air pollution.

The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly, or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The ES should take account of the risks of air pollution and how these can be managed or reduced. This should include taking account of any strategic solutions or SNAPs, which may be being developed or implemented to mitigate the impacts on air quality. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk).

Information on air pollution modelling, screening and assessment can be found on the following websites:

- SCAIL Combustion and SCAIL Agriculture - <http://www.scail.ceh.ac.uk/>
- Ammonia assessment for agricultural development <https://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit>
- Environment Agency Screening Tool for industrial emissions <https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit>
- Defra Local Air Quality Management Area Tool (Industrial Emission Screening Tool) – England <http://www.airqualityengland.co.uk/lagm>

Water Quality

The planning system plays a key role in determining the location of developments which may give rise to water pollution, and hence planning decisions can have a significant impact on water quality, and land. The assessment should take account of the risks of water pollution and how these can be managed or reduced. A number of water dependent protected nature conservation sites have been identified as failing condition due to elevated nutrient levels and nutrient neutrality is consequently required to enable development to proceed without causing further damage to these sites. If your planning application is affected by Nutrient Neutrality, the ES needs to take account of any strategic solutions for nutrient neutrality or Diffuse Water Pollution Plans, which may be being developed or implemented to mitigate and address the impacts of elevated nutrient levels. These solutions or plans should be relevant to the specific planning consultation site. Further information can be obtained from the Local Planning Authority.

Climate Change

The ES should identify how the development affects the ability of the natural environment (including habitats, species, and natural processes) to adapt to climate change, including its ability to provide adaptation for people. This should include impacts on the vulnerability or resilience of a natural feature (i.e. what's already there and affected) as well as impacts on how the environment can accommodate change for both nature and people, for example whether the development affects species ability to move and adapt. Nature-based solutions, such as providing green infrastructure on-site and in the surrounding area (e.g. to adapt to flooding, drought and heatwave events), habitat creation and peatland restoration, should be considered. The ES should set out the measures that will be adopted to address impacts.

Further information is available from the [Committee on Climate Change's \(CCC\) Independent Assessment of UK Climate Risk](#), the [National Adaptation Programme \(NAP\)](#), the [Climate Change Impacts Report Cards](#) (biodiversity, infrastructure, water etc.) and the [UKCP18 climate projections](#).

The Natural England and RSPB [Climate Change Adaptation Manual](#) (2020) provides extensive information on climate change impacts and adaptation for the natural environment and adaptation focussed nature-based solutions for people. It includes the Landscape Scale Climate Change Assessment Method that can help assess impacts and vulnerabilities on natural environment features and identify adaptation actions. Natural England's [Nature Networks Evidence Handbook](#) (2020) also provides extensive information on planning and delivering nature networks for people and biodiversity.

The ES should also identify how the development impacts the natural environment's ability to store and sequester greenhouse gases, in relation to climate change mitigation and the natural environment's contribution to achieving net zero by 2050. Natural England's [Carbon Storage and Sequestration by Habitat report](#) (2021) and the British Ecological Society's [nature-based solutions report](#) (2021) provide further information.

Contribution to local environmental initiatives and priorities

The ES should consider the contribution the development could make to relevant local environmental initiatives and priorities to enhance the environmental quality of the development and deliver wider environmental gains. This should include considering proposals set out in relevant local strategies or supplementary planning documents including landscape strategies, green infrastructure strategies, tree and woodland strategies, biodiversity strategies or biodiversity opportunity areas.

Appendix 3 – Active Travel England consultation response

Standing Advice

Dear Sir/Madam,

In relation to the above planning consultation, Active Travel England (ATE) does not currently provide detailed advice at pre-application stage. However, we have produced a standing advice note that summaries some of the key active travel criteria that ATE will assess when consulted on a formal application. Our standing advice can be found here: <https://www.gov.uk/government/publications/active-travel-england-sustainable-development-advice-notes>

This should be sent to the applicant/agent for their consideration.

Appendix 4 – Sport England consultation response

Thank you for consulting Sport England on the above application.

The proposed development does not fall within either our statutory remit (Statutory Instrument 2015/595), or non-statutory remit (National Planning Policy Guidance (PPG) Par. 003 Ref. ID: 37-003-20140306) and, therefore, Sport England has not provided a detailed response in this case, but would wish to give the following advice to aid the assessment of this application.

General guidance and advice can however be found on our website:

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications

If the proposal involves the loss of any sports facility, then full consideration should be given to whether the proposal meets Par. 104 of National Planning Policy Framework (NPPF) is in accordance with local policies to protect social infrastructure and meets any approved Playing Pitch Strategy or Built Sports Facility Strategy that the local authority has in place.

If the proposal involves the provision of a new sports facility, then consideration should be given to the recommendations and priorities set out in any approved Playing Pitch Strategy or Built Sports Facility Strategy that the local authority may have in place. In addition, to ensure they are fit for purpose, such facilities should be designed in accordance with Sport England, or the relevant National Governing Body, design guidance notes:

<http://sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

If the proposal involves the provision of additional housing, then it will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then new and/or improved sports facilities should be secured and delivered in accordance with any approved local policy for social infrastructure, and priorities set out in any Playing Pitch Strategy or Built Sports Facility Strategy that the local authority has in place.

In line with the Government's NPPF (including Section 8) and PPG (Health and wellbeing section), consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing or assessing a proposal. Active Design provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity.

NPPF Section 8: <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities>

PPG Health and wellbeing section: <https://www.gov.uk/guidance/health-and-wellbeing>

Sport England's Active Design Guidance: <https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design>

Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.

Appendix 5 – Wiltshire Council's highway officer consultation response

The proposal site was initially part of a masterplan within the Local Plan Review which would have seen development connect the A4 at Pewsham with the A350 Lackham roundabout.

This proposal must provide a suitable access arrangement apart from further connections to a southern connector road in order to bring forward this site for development. Outside of a masterplan for a southern connection to the Lackham Roundabout any future plans for a roundabout arm access to the proposal site must be of sufficiently robust design to allow for future traffic use should further development come forward.

The proposal above is for a scoping opinion in terms of required provision for an Environmental Impact Assessment. There will be an environmental impact associated with a large development of 600 dwellings and associated services on the local road network with potential effects on driver and cyclist delay and severing of pedestrian links during construction.

Construction traffic impact would be expected to be addressed within a Construction, Environmental Management Plan and as it is considered transient is not therefore expected to be scoped within an EIA. Similarly, the effect of dust during construction can be mitigated somewhat through conditions within a CEMP.

The most significant impacts on highways will be in regard to increased post construction traffic, provision of new pedestrian and cycle provisions and the increase in public transport use together with how these connect to the local area.

The methodology for provision of information within an Environment Statement can be dealt with in highway terms by the provision of a Transport Assessment. A TA can assess the impact of the proposed development on the local highway infrastructure and provide modelling and although they can be scoped in the round within an EIA the required detail would be provided within a TA.

The TA should make consideration for provision of pedestrian crossings between footways and bus stops, separate cycle and pedestrian accesses from vehicular accesses to the development. Any TA should also make provision for cycleways where enhancing local offerings can be achieved following guidance in LTN1/20. Utilisation of Rights of Way within the site boundary and connection to offsite locations should be sought.

The TA should provide information on the new roundabout access on the A4 through modelling utilising TRICS analysis to provide output on traffic requirements for the new layout and the effect on stacking along the A4 in relation to Pewsham Roundabout. This analysis should provide modelled peak am and pm traffic flow as post construction vehicular movements will increase along all aspects of the local network as a result of this development. Along with a fully scoped TA the assessments provided in future applications should include a Road Safety Audit one and two including the provision of any proposed secondary or emergency access.

Although the site is not within an AQMA the effects may exceed air quality targets within the Calne AQMA and this should be addressed with future submissions within an ES.

The guidance for TA requirements should be taken from Table 2.1 in the attached Local Transport Plan LTP3 currently utilised, as LTP4 has not been adopted yet. Provision for cycleway enhancement and cycle parking should be included as per current Wiltshire policy and national guidance as attached to this comment and contained within LTN 1/20.

Appendix 6 – Wiltshire Council's landscape officer consultation response

Background

The applicant seeks an EIA Scoping opinion for a residential led development of existing agricultural fields to the southwest of Pewsham, Chippenham, on land surrounding Forest Farm. The applicant has submitted the following information to support their request.

- EIA Scoping Request letter to LPA - Tor & Co. (12 March 2025) Doc Ref: 227610.
- EIA Scoping Map (identifying the land) – SCO MAP png.
- EIA Scoping Report – Tor & Co. (March 2025) Doc ref: 227610 / Rev: Final.
- Figure 5 –Photo Viewpoint Location plan – edp (28 March 2024) Doc Ref: edp7351_d002a (included at section 10 (landscape and Visual) of Scoping Report).

It is understood from the description of development contained in section 3 of the submitted Scoping Report that the proposed development will comprise up to 600 dwellings, including a proportion of affordable housing, a small local retail centre, and public open space, and that the proposals will include the first phase of a strategic link road that forms part of the wider mixed use Chippenham site allocation proposed as part of the current Wiltshire Local Plan Review. (The site allocation remains as draft status until such time as the Local Plan is examined in public, found to be sound by HM Planning Inspectorate, and then adopted by Wiltshire Council, at which point it would be incorporated into the Local Development Plan). It is understood that the existing public footpaths running through the site will be retained, and access to the farm will also be maintained, although it is likely to be reconfigured to link to the main access road.

The main purpose of this response is to identify any obvious omissions or errors contained within the Scoping Report that will inform the landscape and visual baseline information to be used within the LVIA, and to comment on the scoping considerations informing initial judgements of the likely significant effects predicted to arise from the scale and nature of proposed development at this site location. i.e. those effects considered most likely to result in potential for significant environmental effects to be 'scoped in' (included) or unlikely to result in much potential for 'significant' environmental effects to be 'scoped out' (excluded) from the EIA, including considerations as an individual stand-alone development, in combination with other cross cutting subject matter EIA subject/topic areas, and cumulatively with other planned or consented development of a similar nature.

Comments and Observations – Landscape and Visual

Section 10 of the submitted Scoping Report considers the potential for significant Landscape and Visual effects. The following observations/comments are intended to inform the LPA's feedback insofar as these relate to the EIA 'landscape and visual' subject matter / topic area. I don't identify any missing national or local landscape designations within the submitted EIA Scoping Report, and neither do I identify any missing Landscape Character Assessments or additional landscape setting assessment /other relevant studies in addition to those already identified and referenced within the submitted EIA Scoping Report which should be used to inform the existing Landscape Baseline for the assessment.

It is agreed that there is likely potential for some significant landscape and visual effects to result upon the existing landscape and visual baseline situation from a proposed development of this nature and scale at this site location.

I note the inclusion of the initial landscape components identified with potential for significant effects to arise from the proposed development, included within Table 10.1 (Initial landscape and visual effects scoping checklist) within the Scoping Report. This checklist considers the following 5 components..

- Landform/topography
- Landcover
- Landscape/Townscape Character
- Protected landscapes/townscapes

- Sensitive views

I am surprised that the initial consideration of components doesn't include a 'landscape fabric' element which would typically include, existing trees, field pattern / hedgerows / other enclosures walls, railings / watercourses / ponds, ditches, etc. This is a landscape component that has potential for significant adverse and beneficial change effects. I appreciate that there may be cross cutting with other ES chapters, however landscape fabric / features should in my opinion be separated out from landcover (which I would typically understand to include permanent pasture or arable cropping, previously developed land etc.) within assessment of landscape and visual baseline scenarios. The consideration of change from agricultural land to a new urban area is overly simplistic. The likely potential for significant effects to arise is viewed to be important to initially consider and separate out from landcover within the checklist and/or include justification for why the 'landscape fabric' within the site itself, and its immediate surroundings is not justified as a specific landscape component to be included within the assessment.

The applicant has specifically asked the LPA for feedback upon the suggested viewpoints to be used to inform the visual assessment included within the LVIA. The Scoping Report Submission is not accompanied by a Zone of Theoretical Visibility (ZTV) Map. But I am familiar with the area and have previously agreed to the viewpoints used for the previous planning application at this site that was refused planning and then subsequently dismissed at appeal. I would be comfortable to agree to the suggested viewpoints as illustrated within Figure 5 (identified as Viewpoint Locations 1 to 11 inclusive, plus Viewpoints A, B, Ci & Cii) however, I highlight that there is a live DMMO (Definitive Map Modification Order) application made to this Council's Highways/Rights of Way team. The application includes evidence to substantiate an upgrade of two lengths of existing rural footpaths to form a public bridleway, including an additional linking spur to and from the A4 London Road. The identified route does not appear to cross the application land but passes close to it and abuts the southern boundary of the site along a short stretch. The DMMO application remains to be determined, however it is recommended that the LVIA's visual assessment evaluates whether any existing proposed viewpoint i.e. Viewpoint A as illustrated within Figure 5, would suitably represent the visual effects of development viewed from this potential new public bridleway receptor, or whether an additional viewpoint location would be necessary to include, somewhere along the new spur length to capture worse case scenario. I have uploaded a copy of the DMMO application as a separate file attachment, so that the applicant can further review and establish the location of this potential upgraded and extended bridleway route.

The current submission does not elaborate within the methodology how cumulative effects will be assessed including cumulative visual effects. It might prove that additional viewpoints may be required, or that the currently proposed viewpoints would be considered suitable for use in the assessment of cumulative visual effects. Elevated visual receptors located along the Limestone Ridge / Greensand Hills overlooking the site from the south, southwest and southeast are considered most likely to have potential for experiencing cumulative visual effects, i.e. VP10, 11, B, Ci, Cii (Locations as currently illustrated on Figure 5 within Section 10 of the Scoping Report).

End.

Appendix 7 – Wiltshire Council's urban design officer consultation response

The intended locations for photo viewpoints from public receptors in Fig 5 including the additional viewpoints (A to Cii) should enable a good coverage in relation to the setting of the built development, its possible overall expanse, general scale, height and massing. I note in relation to waste water processing capacity 16.4 and 16.9, the potential for cumulative effects given the scale of current housing developments listed in 17.3 & the rest of the South Chippenham site; and increased rainfall through climate change finding its way into the foul drainage system, the potential indirect environmental impact of this from discharge of untreated waste water into rivers and watercourses that is a national issue. I am aware of housing development employing pumped holding tanks and possible management charge cost of this to residents.

Appendix 8 – Wiltshire Council's public protection officer consultation response

Having reviewed the EIA Scoping report dated March 2025 reference 227610, public protection have the following comments to make:

Contaminated Land

Within section 8.2 reference has been made to the site being a greenfield, with no existing or historical industrial use. A small brickworks and clay pit are identified, however marked as disused. With the site having potentially limited historic contamination from agricultural use.

Upon checking historical maps, there are markers for unknown filled ground in two different areas, as well as a former forest brick works which has a marker for combined potential contamination. We would therefore look to agree a condition at planning consultation stage asking for representative site investigations at the locations of the historical uses to determine the nature and extent of any land contamination, and if required the submission/implementation of a remediation scheme and subsequent verification.

Noise and Pollution issues

Transport noise

Information regarding noise and good acoustic design can be found in our Noise Technical Guidance. [Environmental advice for developers and planning agents - Wiltshire Council](#)

The development is proposing a new link road between the A4 and the A350 which is likely to impact amenity for new and existing dwellings. We will look to agree suitably worded condition to ensure that occupiers of the existing and new dwellings are protected from adverse noise impacts. We will require a noise impact assessment that includes the following:

A) An acoustic design scheme for protecting new and existing dwellings from external transport noise

B) Compliance with requirements of BS8233:2014 and Professional Practice Guidance: Planning and Noise – New Residential Development (May 2017) (or subsequent versions) for transport noise

Commercial noise

The development proposed includes 600 dwellings and a retail centre. At this stage it is not known what type of business will operate.

There will always be conflict between a mixed-use development where there are residential dwellings inter dispersed with commercial premises, where this is the case there are a number of impacts that are likely to affect amenity, and we would require details at the planning application stage that addresses the following plans detailing the proximity of residential properties to commercial premises.

- Hours of operation
- Deliveries
- Waste disposal
- Noise generated from ventilation ducting
- Patron noise
- Noise from fixed plant and machinery
- Transmission between dwellings (Wiltshire Council would expect that ProPG: Planning & Noise, New Residential Development: Supplementary Document 2 Good Acoustic Design will

be followed. Details can be found in our Noise and technical Guidance Doc - [Environmental advice for developers and planning agents - Wiltshire Council](#)

In order to minimise the impacts and prevent any creep of the background noise levels from fixed plant and machinery, we would look to agree a suitably worded condition requiring a BS4142 assessment that details a scheme of mitigation/attenuation once the design and layout of the scheme is known. The scheme shall demonstrate that the rated level of noise from fixed plant and deliveries shall be -5dB below background. Background levels are to be taken as a 15-minute LA90 at the boundary of the nearest residential noise-sensitive receptors. We will also require a post installation noise assessment to confirm compliance with the noise criteria and any additional steps required to achieve compliance.

BS 4142: 2019. The assessment shall be submitted to the Local Planning Authority together with a scheme of attenuation measures

As part of the governments further homes standard, it is likely the development will have a mandatory requirement to fit the homes with Air Source Heat Pumps (ASHP) and therefore we will require that no Air Source Heat Pumps shall be installed until a noise assessment has been submitted to and approved in writing by the Local Planning Authority. The noise assessment must demonstrate that the cumulative noise impact from all heat pumps installed at the development, achieve a rating level of 35dBLAeq15mins at 1m of the facade of any residential property (including those outside of the development). The noise limit would include the ASHPs at both full duty and when in reverse and defrost mode. The installation works shall be carried out in accordance with the approved details.

Odour

Any commercial units which require mechanical air extraction or ventilation in the development must include a scheme of works for the control and dispersal of any atmospheric emissions, including odours, fumes, smoke & other particulates

The scheme must include full technical details and a risk assessment in accordance with Appendix 2 and 3 respectively of the EMAQ "Control of odour and noise from commercial kitchen exhaust systems" Guidance (Gibson, 2018).

We advise that the ventilation system should discharge vertically at a height of at least 1m above the heights of any nearby sensitive buildings or uses and not less than 1m above the eaves.

Construction

We will look to agree a CEMP which requires that no construction or demolition work shall take place on Sundays or Public Holidays or outside the hours of 0800 to 18:00 Monday to Friday and 08:00 to 13:00 on Saturdays.

The CEMP shall include details of the following relevant measures:

- i. An introduction consisting of construction phase environmental management plan, definitions and abbreviations and project description and location;
- ii. A description of management responsibilities;
- iii. A description of the construction programme;
- iv. Site working hours and a named person for residents to contact;
- v. Detailed Site logistics arrangements;
- vi. Details regarding parking, deliveries, and storage;
- vii. Details regarding dust and noise mitigation;
- viii. Details of the hours of works and other measures to mitigate the impact of construction on the amenity of the area and safety of the highway network; and
- ix. Communication procedures with the LPA and local community regarding key construction issues – newsletters, fliers etc.

Air Quality

The application is close to the Calne AQMA and as such

The applicant must undertake an Air Quality Assessment (AQA) that quantifies the effect of the development on existing local authority air quality monitoring locations and sensitive receptors as well as the proposed development. It must also identify and make adjustments for all core strategy-based development in the development's locality. Use of CURED data in the AQA is expected along with any other currently accepted approaches to AQA.

Appendix 9 – Wiltshire Council's open space officer consultation response

Having read through the scoping report, there does not appear to be anything specific regarding open space and play to comment on at this stage.

However, developer may wish to be made aware that should a planning application be submitted, amount of open space and play will be calculated on dwelling bedroom numbers. They may also like to note that Chippenham Town Council will express an interest in adopting public open space and play, and a request that there is an option for this included in a S106 agreement would be asked.

Appendix 10 – Wiltshire Council's archaeology officer consultation response

I agree that archaeology should be included within the EIA.

The EIA should include a full report detailing the most recent phase of archaeological trial trench evaluation. It should also include an a synopsis/overview of the various phases of archaeological work undertaken within the redline area in order that the impact of the proposed development on the archaeological resource can be better understood.

Appendix 11 – Wiltshire Council’s drainage officer

Wiltshire Council Planning Consultation Response

31 March 2025

Wiltshire Council Drainage Engineer
Technical Services Drainage Engineer
Wiltshire Council

Officer's Name: James Taylor
Direct Line: 01225 716727

Application No: PL 2025 02546
Scoping Opinion following a screening opinion
Request for Scoping Opinion (600 dwellings)
Forest Farm, Pewsham, Chippenham, SN15 3RP

Please note the particulars in connection with the above planning application are available to view on the planning website <http://www.wiltshire.gov.uk/planninganddevelopment.htm>

Documents reviewed:

- Forest Farm Chippenham Scoping Request (3)_Redacted
- Scoping Report

We would expect the drainage specific inputs to the EIA will largely be covered off through the FRA and Drainage Strategy for the development. As part of those, we would expect to see the following information included.

Scoping Advice: Flood Risk

The Wiltshire Council Strategic Flood Risk Assessment, [SFRA Data Explorer](#), has indicated that the site is located within Flood Zone 1 and there has a has a low level of risk from fluvial flooding.

Some portions of the site have a high level of risk from surface water flooding as shown in the image below. This flooding is largely associated with a ditch (ordinary watercourse) that runs through the site, from east to south.



A site investigation undertaken in October and November 2023 revealed the site to be underlain entirely by Kellaways Formation (comprising of Kellaways Sand Member and Kellaways Clay Member). Ground investigations revealed shallow groundwater (<1m bgl) across the site and BRE365 soakaway testing also revealed poor permeability. It is accepted that infiltration is not a feasible means of discharge on the site.

A (final) site-specific Flood Risk Assessment (FRA) should be submitted in support of this application. The site-specific FRA should demonstrate that the site is not adversely affected by flood risk from different sources, and how the flood risk from **all sources** will be managed without increasing flood risk to the development itself or elsewhere. It should also outline the proposed drainage strategy for the site. The applicant is referred to the Environment Agency's [advice](#) on how to prepare an FRA, as well as their standing [advice](#) for vulnerable developments.

The applicant shall review all published Section 19 reports on historic flooding within Wiltshire, and incorporate these into their holistic assessment of flood risk, and historic flood events. These reports can be found on the council website here [Flooding - Wiltshire Council](#)

Scoping Advice: Drainage Strategy / Drainage Design

The applicant should note that in all instances the preference should be to utilise blue-green SuDS which provide multi-faceted benefits to the site (in terms of water quantity, quality, amenity and biodiversity); for example, for attenuation features preference should be given to use of swales / ponds / detention basins (if technically feasible) instead of attenuation tanks. The applicant should adopt a holistic approach to planning the site, and sufficient space for SuDS features should be provided at an early stage in order to fulfil the requirements of NPPF Paragraph 169; the LLFA will not accept statements that there is insufficient space for SuDS or that SuDS have not been utilised due to cost.

Any proposals should be designed in accordance with the Non-statutory Technical Standards for Sustainable Drainage Systems and the latest SuDS Manual (C753).

The LLFA would consider this to be a greenfield site for the purposes of planning. The applicant will be required to be submit calculations that demonstrate post-development runoff rates in accordance with Wiltshire Council's betterment policy can be achieved. The (DRAFT) FRA and Drainage Strategy state that post-development runoff rates will provide 30% betterment over Qbar. It is acknowledged that for the higher return period rainfall events this will provide betterment, however this will not provide the required level of betterment for lower return period events (such as the 1 in 1 year rainfall event). Wiltshire Council's betterment policy for greenfield sites states:

"With regards the control of surface water discharges from greenfield sites, Wiltshire Council requires post development discharges to provide 30% betterment over pre-development (greenfield) discharges for both peak flow and volume. To demonstrate compliance, the applicant must provide pre and post development runoff rates for a range of return periods (1, 30 and 100 year), and pre and post development runoff volumes for the 100 year, 6 hour rainfall event. This takes account of national policy, as outlined in the SuDS Technical Standards."

The applicant should note the EA's updated climate change guidance (dated [27 May 2022](#)) when preparing the Flood Risk Assessment / Drainage Strategy.

The applicant is proposing to culvert existing ditches within the site at locations where they cross the proposed spine road and roundabout. The DRAFT FRA and Drainage Strategy also refers to offsite locations where culverting will be required to facilitate offsite highway works. The applicant will be required to submit calculations that demonstrate understanding of flows within the ditches at these locations, and therefore the required capacity of proposed culverts. The applicant will be required to submit design drawings of these culverts.

The developer should provide the following information as part of future planning applications:

Drainage Strategy

- Evidence that SuDS have been selected, wherever possible, to provide a wide range of benefits including amenity, biodiversity and maintaining water quality.
- Evidence that SuDS source control measures to manage water quantity and maintain water quality have been implemented wherever possible and throughout the management train so the development is not reliant upon large attenuation features close to the points of discharge.
- Existing greenfield runoff rates for the site.
- Post development runoff rates in accordance with Wiltshire Council's betterment policy:
 - *With regards the control of surface water discharges from new development, Wiltshire Council requires post development discharges from greenfield sites to provide 30% betterment over pre-development discharges for all storm events between the 1 in 1year and 1 in 100year return period events.*

- *For greenfield development, the runoff volume from the development to any highway drain, sewer or surface water body in the 1 in 100 year, 6 hour rainfall event should never exceed the greenfield runoff volume for the same event.*
- Evidence demonstrating how the surface water disposal hierarchy has been applied and how all other options have been exhausted. The hierarchy is set out below (as per the Sewerage Sector Guidance, paragraph C.3.12):
 - Surface water runoff is collected for use.
 - Discharge into the ground via infiltration.
 - Discharge to a watercourse or other surface water body.
 - Discharge to surface water sewer or other drainage system, discharging to a watercourse or other surface water body.
 - Discharge to a combined sewer.
- The drainage strategy does not increase flood risk, as a result of catchment transfer.
- A detailed plan showing the existing drainage features on the site and how the proposed drainage strategy will be implemented.
- Surface water can be safely managed within the proposed development, up to and including a 1 in 100 year plus climate change event.
- Existing flood flow routes through the site have been maintained or where they will be affected, adequate measures to intercept and safely control flows through the site have been provided to ensure flood risk is not increased elsewhere.
- The strategy mimics the existing drainage characteristics of the site by retaining and utilising any existing drainage features.
- Measures to prevent pollution of the receiving groundwater and/or surface waters.
- A clearly labelled drainage layout plan showing the pipe networks and any attenuation ponds. The plan should show any pipe node numbers referred to within the drainage calculations.

Ground Investigations

- Geotechnical factual and interpretive reports, including infiltration tests in accordance with British Research Establishment (BRE) Digest 365 – Soakaway Design.
- Groundwater level monitoring (taking into account seasonal variations).

Detailed Drainage calculations

- Calculations and drawings for the drainage system design showing designated holding areas and conveyance routes based on no flooding on site for a 1 in 30 year plus climate change rainfall event.
- Calculations and drawings for the drainage system design showing designated holding areas and conveyance routes based on no flooding on site for a 1 in 100 year plus climate change rainfall event in respect to a building (including basement) or utility plant susceptible to water within the development.
- Calculations should include an allowance for increased surface water runoff, as a result of urban creep, in accordance with LASOO guidance.
- Hydraulic Models should set the MADD factor / additional storage volume factor to $0\text{m}^3 / \text{ha}$ in order to prevent an overestimation of storage capacity in the proposed drainage network.
- If the drainage model includes runoff from the full site (both permeable and impermeable areas), the default Cv values of 0.75 (summer) and 0.84 (winter) may be used. If runoff is only included from impermeable catchment areas within the drainage model, a Cv value of 1 must be used.
- If attenuation tanks are proposed that an allowance for reduced attenuation volume due to silt ingress (as per Section 21.9.9 of the SuDS Manual CIRIA C753).

Design Drawings

- A plan showing the cross sections and design of any attenuation pond and its components.
- Drawings showing conveyance routes for flows exceeding the 1 in 100 year plus climate change rainfall event that minimise the risk to people and property.

Third party consent

- Consent for any outfalls from the proposed drainage systems into a public sewer or other drainage system not owned by the applicant.
- Land drainage consent is required if a development proposes to discharge flow into an ordinary watercourse or carry out work within 8m of an ordinary watercourse.

Ownership and Management

- Details of how the proposed and existing drainage features on the site will be maintained and managed after completion with confirmation from the relevant authority that they will adopt any systems that are being offered for adoption.

Construction

- Adequate measures during construction to control pollution to existing watercourses and groundwater.
- A construction management plan.

Informatives:

The applicant is reminded of their riparian responsibilities for maintaining flows within ordinary watercourses. Guidance on riparian ownership can be found here [Owning a watercourse - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

The table below stipulates the information typically required at each application stage. Provision of the correct information will expedite the processing of applications by the drainage team.

Pre-app	Outline	Full	Reserved matters	Discharge of conditions	Document to be submitted
✓	✓	✓			Flood Risk Assessment / Statement
✓	✓	✓			Drainage Strategy / Statement & sketch layout plan
	✓				Preliminary layout drawings
	✓				Preliminary "Outline" hydraulic calculations
	✓				Preliminary landscape proposals
	✓				Ground investigation report (for infiltration)
	✓	✓			Evidence of third party agreement for discharge to their system (in principle/ consent to discharge)
		✓		✓	Maintenance program and on-going maintenance responsibilities
		✓	✓		Detailed development layout
		✓	✓	✓	Detailed flood & drainage design drawings
		✓	✓	✓	Full Structural, hydraulic & ground investigations
		✓	✓	✓	Geotechnical factual and interpretive reports, including infiltration results
		✓	✓	✓	Evidence of measures to prevent pollution of the receiving groundwater and/or surface waters
		✓	✓	✓	Drawings showing conveyance routes for flows exceeding the 1 in 100 year plus climate change
		✓	✓	✓	Detailed landscaping details
		✓	✓	✓	Discharge agreements (temporary and permanent)
		✓	✓	✓	Development Management & Construction Phasing Plan

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Megan Macpherson (AtkinsRéalis), working on behalf of Wiltshire Council Drainage.

Appendix 12 – Historic England consultation response

Thank you for your letter of 17 March 2025 consulting us about the above EIA Scoping Report.

This development could, potentially, have an impact upon a number of designated heritage assets and their settings in the area around the site. In line with the advice in the National Planning Policy Framework (NPPF), we would expect the Environmental Statement to contain a thorough assessment of the likely effects which the proposed development might have upon those elements which contribute to the significance of these assets.

Our initial assessment shows that the proposed development could have a potential impact on the setting of the Grade I listed Bowood Registered Park and Garden, as noted in the Wiltshire Local Plan, September 2023.

Bowood Registered Park and Garden contains an extensive and complex pleasure grounds and park, the main phases of which were developed between the eighteenth and nineteenth century and include work by Lancelot Brown, Robert Adam, Charles Hamilton, Josiah Lane, Robert Smirke, Charles Barry, John Spencer and George Kennedy. The site lies to the south of the A4 road between Chippenham and Calne with the main drive into the site starting at the Golden Gates at Derry Hill to the North-west.

We would also expect the Environmental Statement to consider the potential impacts on non-designated features of historic, architectural, archaeological or artistic interest, since these can also be of national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place. This information is available via the local authority Historic Environment Record (www.heritagegateway.org.uk <<http://www.heritagegateway.org.uk>>) and relevant local authority staff.

We would strongly recommend that you involve the Conservation Officer of Wiltshire Council and the archaeological staff at Wiltshire and Swindon Historic Environment Record (HER) in the development of this assessment. They are best placed to advise on: local historic environment issues and priorities; how the proposal can be tailored to avoid and minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

It is important that the assessment is designed to ensure that all impacts are fully understood. Section drawings and techniques such as photomontages are a useful part of this.

The assessment should also take account of the potential impact which associated activities (such as construction, servicing and maintenance, and associated traffic) might have upon perceptions, understanding and appreciation of the heritage assets in the area. The assessment should also consider, where appropriate, the likelihood of alterations to drainage patterns that might lead to in situ decomposition or destruction of below ground archaeological remains and deposits, and can also lead to subsidence of buildings and monuments.

If you have any queries about any of the above, or would like to discuss anything further, please contact me.

Yours sincerely, Jacqueline Smith

Appendix 13 – Wiltshire Council's ecology response

Thank you for inviting us to review the above Scoping Report in relation to Land at Forest Farm, Chippenham, which we have assessed against OS maps and aerial photographs of the site and surrounding area, together with GIS layers of statutory and non-statutory designated sites for nature conservation and existing records of protected species.

The site is located to the south of Pewsham which is located on the south eastern edge of Chippenham. The site extends to 38.9ha and comprises seven agricultural fields, associated with Forest Farm, bound by hedgerows and trees. A stream runs through the site and along the southern boundary. The site is bound by the A4 to the east, Pewsham Road and residential properties to the north and west and by agricultural fields to the south. Forest Farm is located within the centre of the site but is excluded from the redline boundary.

The proposed development will comprise up to 600 dwellings, including a proportion of affordable housing, a small local retail centre, and public open space. The site is part of a wider allocation and will include the first phase of the strategic link road and new site access from the A4. Pedestrian and cycle links will be created through the site and the existing public right of way and farm access will be retained. The existing hedgerows and trees on the site will be retained where practical and new areas of informal public open space will be created, including children's play areas.

The site is not within or immediately adjacent to any areas designated for nature conservation. Although the site consists mainly of agricultural fields, it supports some habitats of ecological value to local wildlife, contributing to habitat connectivity with the wider landscape area, providing function for commuting and foraging by a range of species, via hedgerows, trees, grass margins and the stream. Records on site and within the surrounding area include great crested newts (GCN), birds including barn owl, bats, badgers, reptiles, water vole and otter. There are also beaver records on the River Avon approximately 1.7km to the north west of the site.

Overall, we agree with the scope of the biodiversity assessment proposed in Chapter 12 Natural Heritage, however please see the comments below. The following surveys have been undertaken:

- Habitat Condition Assessment
- Invasive Plants
- Hedgerows
- Great crested newts
- Reptiles
- Breeding birds
- Hazel dormice
- Bat roosts
- Bat activity
- Badger
- Otter
- Water vole

The EIA Scoping Report sets out that a range of protected species surveys were undertaken in 2022 with some surveys being updated in 2024. The justification for not updating all surveys is that the updated Extended Phase 1 habitat survey undertaken in 2024 did not identify any significant changes to the types or extent of habitats on site therefore updated surveys for hedgerows, reptiles, breeding birds, dormice and bat activity surveys were not considered necessary.

With regards to bats, it is considered that update activity surveys should be undertaken due to the age of the original surveys and the mobility of bats across the landscape. Surveys should be undertaken in accordance with the BCT good practice guidelines, 2024. The ES should also consider the potential for bats foraging over open land within the site, particularly greater horseshoe bats, where this habitat is proposed to be lost.

A preliminary site layout has not been provided with the EIA Scoping Opinion information therefore it has not been possible to determine what the potential impacts on dormice and reptiles may be. The EclA must be supported by satisfactory baseline information in order to undertake the impact assessment, therefore if significant adverse impacts are predicted or unknown, update surveys for dormice and reptiles would be required.

The stream that runs through the site is a tributary of the River Avon and records indicate there are beavers on the River Avon approximately 1.7km to the north west of the site. The ES should consider the potential for impacts on beaver which could be using the stream.

The cumulative impacts with the wider Land South of Chippenham and East of Showell Farm allocation should be considered as part of the Environmental Statement.

It is noted that the EIA Scoping Report sets out that a Biodiversity Net Gain assessment will be undertaken and an unlocked metric will be provided alongside the planning application.

Appendix 14 – Wiltshire Council’s conservation officer response

Wiltshire Council Planning Consultation Response

7th April 2025

Helen Garside
Principal Conservation Officer
Wiltshire Council Conservation (Central)

Officer's Name: James Taylor
Officer's Title: Senior Planning Officer

Application No: PL/2025/02546
Request for Scoping Opinion (600 dwellings)
Forest Farm, Pewsham, Chippenham

Please find following comments in respect of the above application(s).

Recommendations:

☐	No comment
☐	Support in principle subject to amendments to the scheme (as set out below)
☐	Support subject to conditions (as set out below)
☐	Object (for reasons set out below)
☐	No objections

Scope of comments: the following comments relate to the built historic environment. The main requirement for these comments is to identify any obvious omissions or errors contained within the Scoping Report in respect of the assessments required.

Proposals: the enquiry seeks an EIA Scoping opinion for a residential led development of existing agricultural fields to the southwest of Pewsham, Chippenham, on land surrounding Forest Farm.

The applicant has submitted the following information to support their request.

- EIA Scoping Request letter to LPA - Tor & Co. (12 March 2025) Doc Ref: 227610.
- EIA Scoping Map (identifying the land)
- EIA Scoping Report – Tor & Co. (March 2025) Doc ref: 227610 / Rev: Final.

Site: The site is located to the south of Pewsham which is located on the south-eastern edge of Chippenham. The site extends to 38.9ha and comprises seven agricultural fields, associated with Forest Farm, bound by hedgerows and trees. A stream runs through the site and along the southern boundary. The site is bound by the A4 to the east, Pewsham Road and residential properties to the north and west and by agricultural fields to the south. Forest Farm a non-designated farm which appears to have historic origins, is located within the centre of the site but is excluded from the redline boundary.

Policy: from the point of view of the historic environment, the primary consideration will be the duty placed on the Council under Section 66 of the Planning (Listed Building and Conservation Areas) Act to have **special regard** to the desirability of preserving listed buildings and their settings.

The Council's Core Strategy Policy CP58 'Ensuring the conservation of the historic environment' requires that designated and non-designated heritage assets and their settings will be conserved, and where appropriate enhanced.

The Council's Core Strategy CP 57: Ensuring high quality design requires a high quality of design in all new developments.

The National Planning Policy Framework (NPPF) outlines government policy, including its policy in respect of the historic environment (Section16).

Assessment: The description of development contained in section 3 of the submitted Scoping Report advises that the proposed development will comprise up to 600 dwellings, including a proportion of affordable housing, a small local retail centre, and public open space, and that the proposals will include the first phase of a strategic link road that forms part of the wider mixed use Chippenham site allocation proposed as part of the current Wiltshire Local Plan Review. It is understood that the existing public footpaths running through the site will be retained, and access to the farm will also be maintained, although it is likely to be reconfigured to link to the main access road. The site allocation, however, is currently not adopted and the Local Plan has yet to be examined in public. At this stage it cannot be assumed that the allocation will necessarily come forward in its current form.

Overall, I am in agreement with the details set out in Chapter 7 Cultural Heritage and the designated heritage assets which have been identified. There are no designated heritage assets located within the proposed development area itself and the key consideration will relate to setting impacts on designated assets surrounding the site, as identified. The assessment should, however, also include assessment of potential non-designated heritage assets in the area (including Forest Farm at the centre of the site) in addition to the assets already identified.

With regard to the impacts summarised in Table 7.2, I would comment that the loss of the site's historic landscape character may have been under-estimated as, in addition to its intrinsic value, this will also relate directly to the contribution that the site makes to the settings and significance of the various assets identified. I would suggest that this therefore be scoped-in for assessment. Whilst the impacts on the significance of the non-designated Forest Farm (which is assumed at this stage as being a non-designated heritage asset) and Wilts and Berks Canal should be capable of mitigation via careful design and the resultant impacts, taking into account the non-designated status of the assets concerned, not 'significant' in EIA terms, these assets should also be included and scoped-in for assessment within the study in due course.

It will also be important that the cumulative impacts with the wider Land South of Chippenham and East of Showell Farm allocation be considered as part of the Environmental Statement.