Mulberry House
Group

10 September 2024

Mr Callan Powers
Planning Officer
Wiltshire Council
Bythesea Road
Trowbridge
BA14 8JN

Dear Mr Powers

Planning Application: PL/2023/02992 - Land South of Headlands Farm

Further to our letter of 23 August 2024, we now set out our observations in respect of the issues raised by Highways Department's anonymised response dated 19 August 2024.

1. Administration and Procedure

However, before doing so, it is necessary to request your confirmation on some general procedural and administrative points.

a) As you are aware, despite many attempts by the members of the team to contact you both by phone and in writing, we have heard nothing from you since your email of 16 May 2024, when you requested an extension of time to 19 July 2024.

b) Please may we therefore have your confirmation that this is merely by oversight and does not imply any other cause.

c) We are most concerned to note that none of our representations and communications of 14 May 2024, 15 May, 17 May (2), and 26 July, 13 August and 16 August have been either acknowledged or uploaded to the portal, as appropriate. Given the matters addressed, and the potentially one-sided or partial impression this might give of this application, we wonder whether this is also an oversight. Please confirm the reason.

d) In particular, the Council's failure to advise us when the application was withdrawn from the planning committee agenda for the August meeting were particularly unfortunate omissions. Even when numerous attempts were made to you, both direct and via your

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office, no-one was able to say what the position was. This at less than 48 hours prior to the intended consideration of the application appeared nothing short of discourteous. When may we advise the applicant to expect an explanation, please?

e) Please may we have your confirmation as to the reason and your reassurance that our client's application is being treated in accordance with the substantial fees already paid. Not only direct to Wiltshire Council as its client, but also in respect of the considerable time and cost of preparation of many in-depth reports commissioned by the applicant, specifically at the request of the Council.

f) To ensure that you receive this, we are sending this letter both by email and by tracked signed for post. Should it be that any of our earlier communications have been missed, please let us know.

2. Highways' Renewed Comments

We turn now to the substantially repetitive comments dated 19 August 2024, by your Highways Department. We note, once more, that your colleague has regrettably repeated factual errors in the original comment from Highways. In particular, we must draw your attention to section 4 of our letter of 15 May, attached for your convenience.

2.1 Farfield Lane is a Private Road and not a public highway

In addition to drawing your attention to section 4.1 to 4.4 inclusive of our attached letter.

a) For clarity, we confirm that this addresses both the incorrect assertions by Highways and earlier by Rights of Way teams. The status and use of this private road is set out in section 34 (1) – (4) inclusive of the Road Traffic Act 1988 (as amended). The text of this provision follows:

> 1)Subject to the provisions of this section, if without lawful authority a person drives a mechanically propelled vehicle—
>
> (a)on to or upon any common land, moorland or land of any other description, not being land forming part of a road, or
>
> (b)on any road being a footpath, bridleway or restricted byway,he is guilty of an offence.
>
> (2)For the purposes of subsection (1)(b) above, a way shown in a definitive map and statement as a footpath, bridleway or restricted byway is, without prejudice to section 56(1) of the M1Wildlife and Countryside Act 1981, to be taken to be a way of the kind shown, unless . . . the contrary is proved.
>
> (2A)It is not an offence under this section for a person with an interest in land, or a visitor to any land, to drive a mechanically propelled vehicle on a road if, immediately before the commencement of section 47(2) of the Countryside and Rights of Way Act 2000, the road was—

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(a)shown in a definitive map and statement as a road used as a public path, and

(b)in use for obtaining access to the land by the driving of mechanically propelled vehicles by a person with an interest in the land or by visitors to the land.]

(3)It is not an offence under this section to drive a mechanically propelled vehicle on any land within fifteen yards of a road, being a road on which a motor vehicle may lawfully be driven, for the purpose only of parking the vehicle on that land.

(4)A person shall not be convicted of an offence under this section with respect to a vehicle if he proves to the satisfaction of the court that it was driven in contravention of this section for the purpose of saving life or extinguishing fire or meeting any other like emergency.

We have again to refer to section 34 (2A) which specifically provides for owners and frontagers and (among others) their visitors and agents to use the road in the same way as the landowner him, her or itself.

To be clear: (i) when a landowner invites another or grants a licence to a person (such as a holiday visitor) entitles that person to the rights of s34 (2A) protection for the duration only of such invited or permitted visit; and

(ii) Farfield is a private road

b) The Status of CRIC15 as a bridleway over privately owned and maintained land

Such permissive right of passage on foot and horse as is granted along Farfield Lane is set out in section 55 subsections (1) and (4) of the Countryside and Rights of Way Act 2000 (as amended) (CROW). The provisions state:

(1)Subject to subsections (2) and (3), the public shall, as from the day after the cut-off date, have a right of way on horseback or leading a horse over any way which—

(a)was immediately before 1st January 1949 either a footpath or a bridleway, and

(b)is, throughout the period beginning with the commencement of this section and ending with the cut-off date,

a footpath which is shown in a definitive map and statement as a bridleway.

(4)Any right of way over a way by virtue of subsection (1) is subject to any condition or limitation to which the public right of way on foot over that way was subject on the cut-off date.

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All such users should be aware of the provisions of sections 12 and 13 of CROW and for their own protection should ensure that they bear adequate third party liability and personal accident insurances.

For the avoidance of doubt by section 13 (1) of CROW, such persons, horses and dogs (where permitted), are not visitors and do not have the same status in using Farfield Lane as those visitors and agents under section 34 of the Road Traffic Act 1988 referred to above.

c) Furthermore, it should be noted that the two classes of user along this privately owned and privately maintained, metalled road, which comprises Farfield Lane, are not mutually exclusive. Representations by both Highways and Rights of Way appear to be under the misapprehension that there is a provision for exclusivity of public rights over private land, in effect a nationalisation of private land. This is not correct.

d) Farfield Lane is a private road maintained by the frontagers. Equally there appears to be a misguided and unfounded view by Highways that Farfield Lane is neither maintained and surfaced privately, nor available for the use of frontagers, landowners and their invitees. This road is not, nor ever has been, a road for which the local authority has sought or assumed responsibility for maintenance under either sections 36 or 38 of the Highways Act 1980 or otherwise.

e) Highways seems to have a lack familiarity with the state of Farfield Lane roadway, together with its uses and manner of the frontagers' use. There are some twelve frontagers ranging from existing holiday and leisure uses (including seasonal caravan storage), private residential use to commercial and farm and agricultural related uses involving large scale agricultural equipment. All these occupiers and their related activities use the well surfaced and maintained Farfield Lane.

f) Far from being the dirt track, which Highways seeks to assert, the roadway is amply wide for modern large and heavy agricultural vehicles and the structure of the road is adequate for regular use by large, heavy vehicles.

g) There are several existing passing places already along the length of Farfield Lane, which have become overgrown, but all of which are scheduled to be cleared and improved as appropriate.

h) Nevertheless, as is plainly visible along its length, Farfield Lane is a properly constructed, tarmac surfaced, well maintained private road, capable of dealing with a variety of personal (including holiday), commercial and agricultural traffic, including large scale commercial and agricultural vehicles, which regularly uses its length for the conduct of the frontagers and their visitors daily lives. To imply that Farfield Lane is incapable of accommodating vehicular traffic at present can only suggest a lack of familiarity with the vicinity.

i) Regrettably, the opinions asserted by Highways appear to be unsupported by fact.

2.2 Holiday Visitors

We refer to sections 4.5 and 4.6 of our earlier letter.

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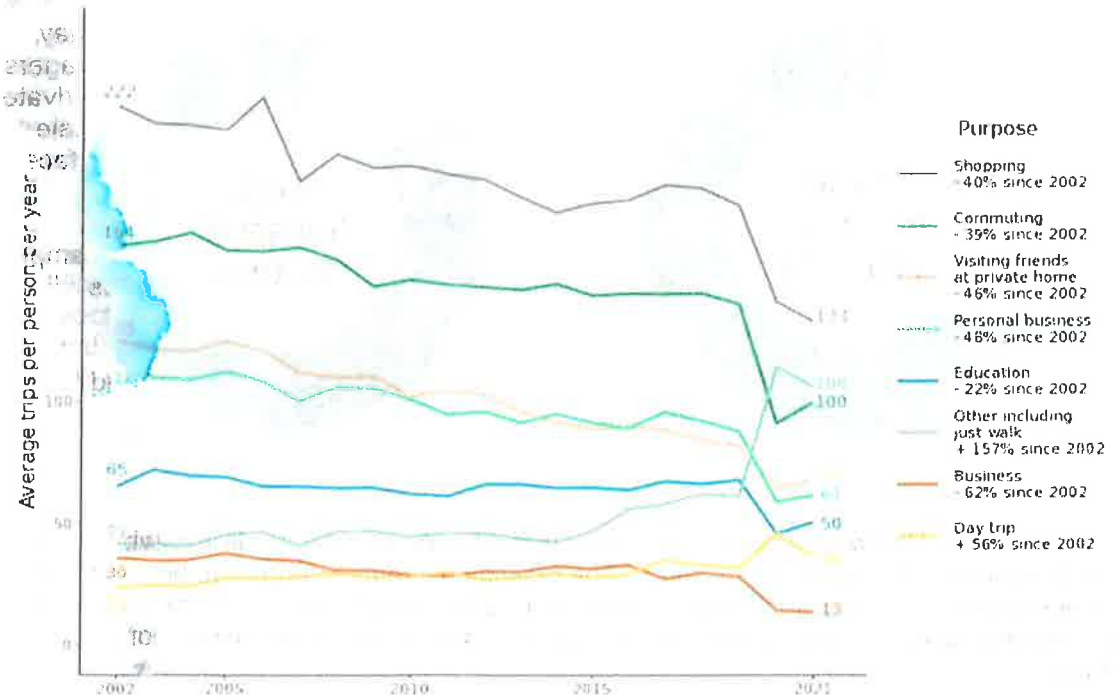
a) Highways appear unable or unwilling to acknowledge or accept that holidaymakers (perhaps even the anonymous author of the Highways observations him, her or them self) does not seek to replicate the daily round, routine and/or commute when enjoying the holiday freedom from that aspect of a person or family's life. This is the purpose of vacation: an opportunity to rest, recharge and reset to return refreshed to the daily grind.

b) The assertion, therefore, that holiday makers will follow the daily routines both as demonstrated at paragraphs 4.5.2 to 4.5.6 inclusive of our earlier letter and such as those identified in the National Travel Survey 2021 are unlikely to be capable of extrapolation to holidaymakers. (https://www.gov.uk/government/statistics/national-travel-survey-2021/national-travel-survey-2021-trips-by-purpose-age-and-sex)

Trends in trips and miles travelled by purpose

Chart 23: Trips per person per year by selected purposes: England, 2002 to 2021
(NTS0403)



c) This is borne out by the findings of Transport Statistics Great Britain: 2022 Domestic Travel which shows that of private travel trips made in 2021, more than a third were "active travel" and that "Most modes of travel are used for a mixture of purposes, however, in 2021, about half (**51%**) of all trips by rail are for either commuting or business purposes".

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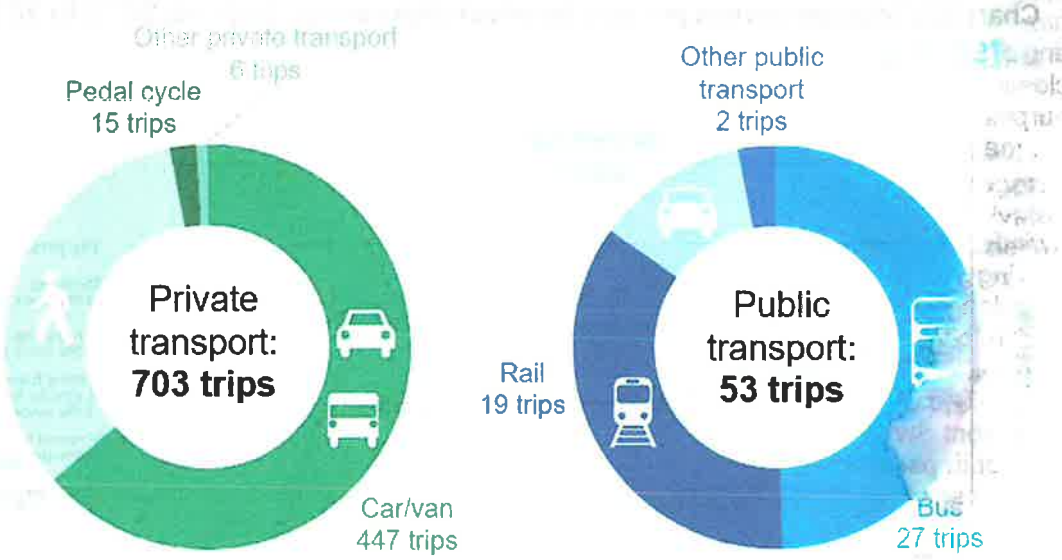
d) Given that holidaymakers are not undertaking commuting or business trips, this immediately decreases the number of trips or personal/vehicular movements to and from the villas to be built at the Farfield eco-village. The overall effect is that the number of movements daily by each visitor imputed by Highways does not appear to be based on fact.

How many trips we make in a year

Data Source: TSGB0103

On average, people in England made 757 trips across private and public transport modes in 2021.

Chart 2: Average number of trips made per person, England, 2021



e) Similarly, Highways appear to consider that a family on holiday will inevitably deploy several vehicles to transport themselves. The reasoning seems strangely to be based on four bedrooms. How does that logically and reasonably follow? Family passenger vehicles can normally safely and legally transport five or up to seven occupants, depending on vehicle.

2.3 How do visitors arrive at Farfield Lane?

a) Regrettably, Highways seem unable to grasp the idea that Farfield eco-village will operate an EV concierge service to pick up visitors from Swindon Railway Station and or other public transport. We confirm, therefore that Farfield eco-village will operate a concierge service offering a variety of facilities as previously set out. This negates the

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spurious calculations and other unsupported assertions made in Highways second objection regarding the various impossibility or impracticability of active travel to or from Farfield Lane.

b) The EV concierge service will, of course apply on return journeys and also on request for journeys while staying at Farfield eco-village. Because of the solar powered EV charging points to be provided at each property, we anticipate that the vast majority of all travel to and from Farfield Lane will comprise active travel and non-polluting motorised movements.

2.4 Visitors' travel while at Farfield eco-village

We refer to sections 4.7 and 4.8 of our attached letter

a) Highways appears to maintain a highly unusual (and hardly contemporary) distaste for active travel and non-polluting forms of travel.

b) Yet again, we have to reiterate that cycling from Farfield Lane is far from the hazardous occupation which Highways predicates. From Farfield Lane either to Swindon and associated cycle routes or to Cricklade, there is the specific provision of the C7, which is closed to all forms of motorised transport. Closed by Wiltshire Council specifically for the purpose of supporting cyclists. This route is now heavily used by cyclists. he In this regard, the maps on pages 8, 9 and 10 of our earlier letter remain correct and relevant.

c) Unfortunately, the respondent for Highways seems to be rather unfamiliar with Swindon and Cricklade. The observations regarding the difficulties and danger or cycling (or walking) between Swindon and Farfield Lane and Cricklade are entirely wrong. On leaving Swindon Railway Station, any cyclist is free to choose to take the C7 route, which is entirely closed to vehicles – except cyclists.

d) The C7 (part of the National Cycle Route Network route 45) provides a safe cycling route from Swindon to the head of Farfield Lane and from there onwards via the old Railway Line (or in part along Cycle Route 45, the Mercian Way) direct into Cricklade Town. Concerns about safety are therefore happily unfounded. While this part of the route 45 has been closed for a year, its reopening in full is imminent and the closure is therefore irrelevant to this application.

e) As to the time that a cyclist will take between Swindon and the application site, that is dependent on the proficiency of the individual cyclist. With average cycling speeds ranging from about 10mph for novices to around 25mph for proficient cyclists. (https://www.road-bike.co.uk/). According to Cycle Travel, the whole route from Swindon Station to Cricklade is only 5.1 miles, so it is difficult to understand how the proscriptive estimate of 1 hour's cycling time is difficult to understand. Assuming that the time to the application site is the same as for the whole way to Cricklade, a better estimate based on 10 mph would be 30 minutes or less. (https://cycle.travel/city/swindon/map?from=Swindon+Railway+Station&to=Cricklade)

f) Similarly for travel on foot by visitors, the route from Swindon to Farfield Lane and Cricklade is the same as to that for cyclists, in addition to the several established footpaths connecting with Farfield Lane is all directions. Highways claims that there are inadequate walking routes local to the application site and that active and sustainable foot travel to Cricklade is impossible. This is incorrect.

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g) Among the many other footpath routes local to Cricklade and Swindon, there is a very attractive circular footpath route to Cricklade partly along the towpath, which incorporates Farfield Lane https://www.swindonadvertiser.co.uk/news/18289725.sunday-walk-easy-five-mile-route-around-cricklade/

2.5 What type of visitors will come to Farfield eco-village?

a) The author of the Highways comments appears to find it difficult to distinguish between commuter and holiday travel and to understand that in many, if not most cases, individuals are keen to shun the daily grind when on holiday. Travel times and patterns are entirely different from the comings and goings of commute and back, children to school and back, weekly groceries and whatever else is happening in a family's daily round.

b) The whole point of a holiday is for a break from routine. Time to enjoy, time to watch the world go by – or maybe just enjoy the peace, sit and read a book for a while. Then perhaps gather the family together for a leisurely walk or cycle to a favoured eatery. Time to enjoy each other's company.

c) With the option of a return journey via the eco-village concierge EV instead of a walk or cycle back to the eco-village. As Highways have rightly noted, these lodges are all eco-lodges, where sustainability is the key, where each property has its own solar powered charging point in addition to solar power and other sustainable solutions for everyday living. These lodges will appeal principally to the already eco and sustainable converts whose way of life is to tread lightly upon the earth.

d) A second category of visitors is likely to be those people who wonder about living a more sustainable life and treat a visit for a week or two as a trial to see how they are going to be able to work sustainability and a light footprint into their daily lives.

e) Neither of these categories fit Highways' vision of the antisocial visitors to some unfortunate Mediterranean island. The investors in, and holiday makers to, Farfield eco-village will be couples and families (maybe multi generational) of settled manner.

f) Farfield eco-village will not be a destination which caters for, or permits, stag or hen parties or their participants. In that we are in full agreement with Highways, the "stag and hen" profile would sit very uncomfortably with this glorious, tranquil part of the golden Cotswolds.

2.6 Why does Highways "push" Gloucestershire?

a) Although Highways appears to have a jaundiced view of Cricklade and North Wiltshire and its beautiful scenery, its important cultural background and its appealing historical treasures, knowing visitors do want to come to Cricklade. They are keen to come to the area, spend their leisure here and add value to the community and businesses in the town with tourist spending.

"Cricklade, of course, is well worth exploring in its own right.

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> Famously the first town on the Thames, it was founded more than a millennium ago by the Anglo-Saxons and was home to a coin mint until 1100." Swindon Advertiser 8 March 2020

b) There are many reasons why intellectually curious, environmentally enquiring and generally interested visitors should be encouraged to this neglected, forgotten or overlooked part of the North Wiltshire Cotswolds. Why would Wiltshire not be keen to promote the social, financial and commercial well-being of its smaller town's businesses?

c) All versions of the NPPF, including the current draft, draw attention to the importance of adjoining counties cooperating on policy, but nowhere is there a requirement for one count to do itself down in favour of another. So why is Wiltshire Highways apparently so keen to promote Gloucestershire's recovered gravel pits development?

2.7 Which version of the NPPF applies?

a) Highways appears to be wedded to the twice superseded 2021 version of the NPPF and possibly to be superseded soon for a third time.

b) Which ever version of the NPPF is taken, the same wording appears:

> "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe"

In the 2021 version, this appears at paragraph 115, in the current December 2023 version of NPPF at paragraph 115. In the 2024 draft version, the same provision is included at paragraph 113 with the addition of "in all tested scenarios" at the end.

3. We await hearing from you in relation to the various matters set out in this letter.

Yours sincerely

Mulberry House Group

Carolyn Owen
Director - Head of Legal
Mulberry House Group

Cc: Mr D J Cleverly, Planning Consultant

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15 May 2024

Mr Callan Powers
Planning Officer
Wiltshire Council
Bythesea Road
Trowbridge
BA14 8JN

By email to planning@sf.wiltshire.gov.uk

Dear Mr Powers

Planning Application: PL/2023/02992

1. Enclosures

With this letter, we are pleased to attach a SuDs and an Archaeology report as requested, for attention.

We thank all your professional colleagues for their input and comments on this application. If there are any further issues which you or your colleagues feel need to be further addressed, we will of course, be happy to do so.

2.1 Responding to Comments

While writing, we wish to record that the applicant is committed to the application for a holiday eco-village and that this is not an application with a view to leading to subsequent attempts to convert the development for residential purposes. The applicant is open to complying with all reasonable and proper planning conditions to secure the development as a holiday property development to complement the existing holiday facilities adjoining and close to Farfield Lane.

2.2.1 The Farfield Eco-Concierge Service

As an integral part of ethos and conduct of the eco-village project, the developer will operate a concierge service. One of the main purposes of the concierge service is to enable guests

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to travel by public transport to local transport hubs. From there, visitors will be brought direct to Farfield eco-village actively discouraging private vehicle use and journeys, both for coming to Farfield and while resident at the eco-village.

2.2.2 The fully integrated and comprehensive concierge service will appeal particularly to environmentally aware visitors. Throughout visitors' stay at Farfield eco-village, guests will be able to avail of extensive concierge services to ensure that their visits are comfortable, relaxed and able to access the many little known facilities available in North Wiltshire. The concierge service has been designed to ensure maximum comfort for all visitors at the same time as minimising the village's carbon presence.

2.2.3 One of the Farfield eco-concierge's services will be to facilitate the access for hire of bikes and other sports and activity equipment for holiday use by visitors. The developer is actively pursuing arrangements to put this facility in place for guests' use, help planning days out and trips away from Farfield, whether using active travel or other environmentally thoughtful means. Similarly, the concierge will enable the bringing of requested supplies to Farfield in an environmentally sustainable way to further assist guests.

2.3.1 The Farfield Eco-Village Victor Profile

Visitors to Farfield eco-village are keen to limit their carbon footprints. These holidaymakers are already environmentally aware and prefer to resist the appeal of air travel to faraway destinations. Eco-village visitors have a desire to minimise their negative effect on the planet, while maintaining a satisfactory and rewarding lifestyle.

2.3.2 For many visitors, the incorporation of many of the facets of environmental stewardship into both their daily lives and their leisure time is central to their approach to living a sustainable and satisfying life. Both these careful converts and their eagerly researching cousins constitute the profile of the visitors to Farfield eco-village. Whether town, rural or coastal dwellers in their daily lives, these folk are keen to make the most of "time off" in a gentle and environmentally friendly way.

2.3.3 The profile of these visitors is not to exploit either their own or their holiday home areas. Rather, these are people looking to leave a positive mark in their wake. The Farfield eco-village visitors understand that exploring the local culture enhances both them and the local residents, by human interaction, employment and contribution to the local businesses and economy. This type of environmentally friendly tourism can only bring benefits to the beautiful, culturally rich, but neglected North Wiltshire.

2.4 Correcting Factual Inaccuracies

In particular we refer to the existing holiday and holiday related uses at and adjoining Farfield Lane: Hornbeam holiday cottages; Hayes Knoll Farm; and the caravan and motorhome storage yard at Headlands Farm in Farfield Lane. It is therefore incorrect that there is no commercial use of property adjoining Farfield Lane. For HMRC purposes agricultural land is non-residential and therefore commercial by default.

2.2.1 In addition, we are pleased to include observations, as appropriate, on the various comments received from both the statutory officers and bodies as well as individuals. We have been most concerned that two of the professional comments/reports about our application contain important factual inaccuracies.

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2.2.2 In both cases: Highways and the Kernon Countryside response there are incorrect statements and incorrect references to statute and other legal documents. For the avoidance of doubt, corrections to both are incorporated below at sections 4 and 12 respectively.

3.1 Setting out Responses to Comments

The following table shows the responses received from all parties requiring developer's further input, earliest at the top. The right hand column refers to the location of the responses in each case. We trust that this will assist with ease of reference.

PL/2023/02992 Planning Application for Burnett, Farfield Lane, Cricklade, Swindon

Observations and Comments received

Date	Name	Status	Reference in Accompanying Report
21 Feb 2024	Drainage (Wiltshire Council Drainage Engineer Technical Services Drainage Engineer) (Jed Ainsley-Bridger - (AtkinsRéalis working on behalf of Wiltshire Council Drainage)	External adviser to Wiltshire Council	Please see supplementary Drainage and SuDs report attached and please see Drainage below
23 Feb 2024	Archaeology (Tim Havard CWI23358)	Wilts Council	Please see accompanying archaeological report attached
7 Mar 2024	Climate Team (James Taylor BA(Hons) MA MRTPI Climate Officer, Climate and Environment,	Wilts Council	Please see supplementary Drainage and SuDs report attached and observation at Climate and Environment

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	Wiltshire Council James.taylor @wiltshire.gov .uk - 01225 716727)		
8 Mar 2024	Environment Agency (Ms Lindsay Flello Sustainable Places - Planning Advisor)	Governmental/Statutory	Please see supplementary Drainage and SuDs report attached
12 Mar 2024	Victoria Fairburn	Private	Comments follow
12 Mar 2024	Highways Dept (unsigned)	Wilts Council	Please see supplementary transport report below
12 Mar 2024	Simon Henry	Private	Comments follow
13 Mar 2024	Mr and Mrs P Baker	Private	Comments follow
15 Mar 2024	Victoria Minion-Newby	Private	Comments follow
15 Mar 2024	Cricklade Town Council	Statutory	Comments follow
17 Mar 2024	S Emms	Private	Comments follow
18 Mar 2024	Kernon Countryside Consultants	Private. On behalf of Farfield Farm	Comments follow

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18 Mar 2024	I Houghton	Private	Comments follow
2 Apr 2024	Cllr Nick Dye	Councillor	Comments follow

3.2 While additional and/or supplementary reports have been prepared and are attached as noted in the right hand column above, in several instances, we have also included some observations either alone or additional to the attached documents.

3.3 Where observations are made, they are included in this report following the chronological order of the above table and are numbered accordingly.

4. Highways and Transport

4.1 It is disappointing to need to highlight factual inaccuracies on which Highways objection to this application appear to be based.

4.2 The objection refers to s38 Highways Act 1988. Should this read s34(1) of the Highways Act 1988? If so, the subsequent argument regarding the right to travel along Farfield Lane appears to fail to take account of sections 34(2) – (4) inclusive. The assertions regarding the ability to use Farfield Lane would therefore appear misguided and incorrect.

4.3 We regret that we are unable to follow the reasoning of Highways objection that because private cars will not be able to use Farfield, that there will be a significant increase in the vehicular usage of the lane. Please can this be explained, because in its present form, this is both wrong legally (see 4.2 above) and factually regarding usage as demonstrated below.

4.4.1 Highways seem to approach the usage of Farfield Lane by holiday visitors to Farfield eco-village as though the use would be consistent with normal residential pattern of commuter, school and other regular lifestyle demands. Data available examining the differences in vehicle usage and journeys for holiday visitors, indicates that patterns of usage cannot be assumed to be the same. Instead holidaymakers choose to live differently when away from home and the constraints of daily routines: *Customer profile is low vehicle use//active transport*

4.4.2 Presently Farfield Lane has a good number of places which have been adapted for vehicles to pass safely. Cars daily pass comfortably by large tractors, lorries and agricultural vehicles. Also of note: Farfield Lane widens where it meets the C70 and likewise to the east, after the railway bridge at the entrance to the site.

4.4.3 However, the developer expects to add three further proper passing places on the privately-maintained lane which will add to the existing areas that are commonly used daily.

4.5.1 Multi-Vehicle Visitors?

The assertion by Highways that visiting families or households will bring multiple cars on holiday is, at best, misguided. We therefore refute and dismiss this aspect of challenge.

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The only instance where the developer can envisage that might pertain, would be in the event of disabled visitors. But this is thought to be extremely unlikely. The developer would very reluctant indeed to dissuade any disabled visitors from enjoying a holiday in North Wiltshire – on those or any other discriminatory grounds.

4.5.2 Available literature on holiday traffic movements, is set out in "Travel behavior on vacation: transport mode choice of tourists at destinations" by Bartosz Bursa, Markus Mailer, Kay W. Axhausen in Science Direct, Volume 166, December 2022, Pages 234-261 (https://www.sciencedirect.com/science/article/pii/S0965856422002543).

4.5.3 This paper examines international research into holidaymakers' travel behaviours and shows that visitors travel patterns are different from the same people's "normal" journeys and also different from those resident in their chosen holiday destination.

Especially since visitors' travel behavior differs not only from how they behave on a daily basis at home (Guiver et al., 2008, Prillwitz and Barr, 2011), but also from the behavior of residents in the regions they visit (Lumsdon, 2006, Kinsella and Caulfield, 2011) . . .

To be precise, we do not only know very little about how and why tourist choose transport modes for their intra-destination trips, but we even struggle to predict aggregate traffic flows resulting from tourist travel because this population segment is not accounted for in transportation demand models. Consequently, local authorities and administration do not have the empirical evidence necessary for policy-making and must base their decisions on conjectures.

4.5.4 This particular research study was undertaken in the Austrian Alps where the mountainous terrain and limited alternative routes define a contrasting and dissimilar pattern of traffic movements and problems of capacity from the low-lying plains of the Thames Valley. Having studied widely from international sources on holiday travel research, the authors state:

The literature is unanimous that major choice determinants are the transport mode used for the trip to the destination and the type of vacation (individual or organized by a travel agency), whilst the evidence with respect to age, length of stay, company size and number of previous visits is contradictory. It should be noted, however, that the aforementioned studies operate on respondents' simplistic statements about transport mode used for mobility during the stay in general, regardless of the actual duration, cost, and other characteristics of the trips . . .

Several conclusions about factors important for modal shift from private cars to public transport can be drawn, in particular within the context of national parks and recreational areas. For example, Steiner and Bristow (2000) investigated road pricing schemes in a British national park and identified travel time, cost (fare and toll) and bus frequency as significant factors in choosing between a park-and-ride service and a toll to drive. Shiftan et al. (2006)

4.5.5 *The conceptual representation of a full travel pattern of a tourist is given in Fig. 1. In its simplest form, it consists of: (1) a long-distance trip from home to the destination, (2) a*

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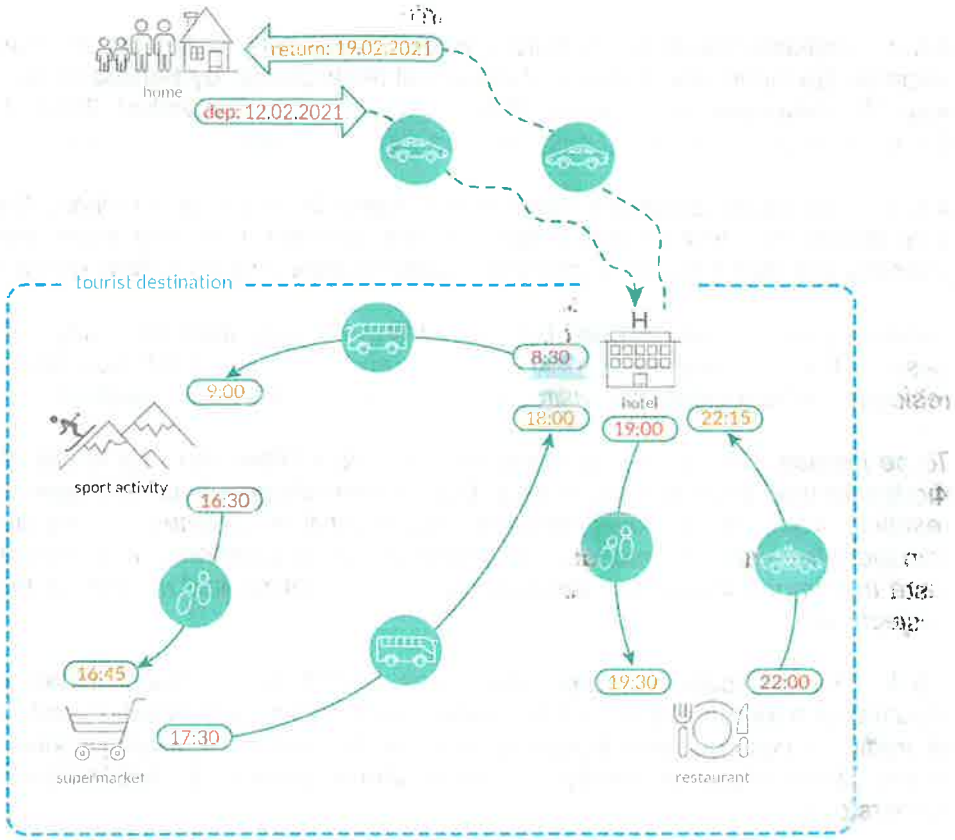
sojourn at the destination (at least one-night-long stay), during which activities and trips are made, and (3) a long-distance return trip home.



The daily pattern enclosed in the blue rectangle in Fig. 1 can take various forms and Fig. 1 represents only an example scenario. The number of trips can range from two (there and back) to many, and they can vary in duration, purpose and location. In mountainous areas, there are noticeable differences between seasons. For instance, summer is typically characterized more complex activity chains and longer trips than in winter, while travel patterns in winter are more homogeneous and often timed with the opening hours of ski resorts. (Bartosz Bursa, Markus Mailer, Kay W. Axhausen)

4.5.6 While it is not asserted that there are any definitive responses to the precise numbers and patterns of traffic movements by visitors for any particular location, the extensive examination of available data and careful working of models identified above, does point to a holidaymakers' travel patterns a holiday destinations being radically different from those in their normal daily lives. This therefore makes reliance on "at home" daily traffic movements, claimed in the Highways objection, unsafe.

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4.6 Regrettably, Wiltshire's published information on active/holiday travel is particularly lacking in relation to North Wiltshire. Neither visitwiltshire.co.uk nor connectingwiltshire.co.uk offer the prospective visitor to the beautiful, if neglected, northern quarter of Wiltshire much in the way of encouragement in planning a sustainable holiday. The casual reader might be forgiven for thinking that arriving by train at Swindon precluded the visitor from hiring bikes for the holiday and returning them on departure. Without doubt, Swindon takes part in Cyclescheme, but leisure visitors are hoping to get away from the daily commute, not from active travel.

4.7.1 The Highways Objection summarily dismisses the topic of active travel. This is perplexing and incorrect. Both walking and cycle riding are treated with near disdain, which is far from the case for people who are already environmentally aware. Data for all ages of holidaymakers in Norfolk, by way of example only, wholly refutes this. The pattern is broadly that holidaymakers plan to visit a location and will walk 8-10 miles to reach that location, spend time and money at the destination before returning to their holiday "home" via public transport. What a pity that connectingwiltshire.co.uk does not have useful, visitor friendly information such as that at: https://www.visitnorthnorfolk.com/blog/read/2021/11/enjoying-north-norfolk-without-a-car-b121

4.7.2 Cycling from Farfield Lane, the Highways Objection appears to be unaware that the C70 has been sealed off and become a very popular location for cyclists. From Farfield Lane, it is wrong to assert that cycling would not be feasible. Suggested cycling routes from just two of the many cycling websites covering the area of Cricklade show that this is not the case.



https://www.routeyou.com/en-gb/location/routes/47302122/cricklade?route-type=1

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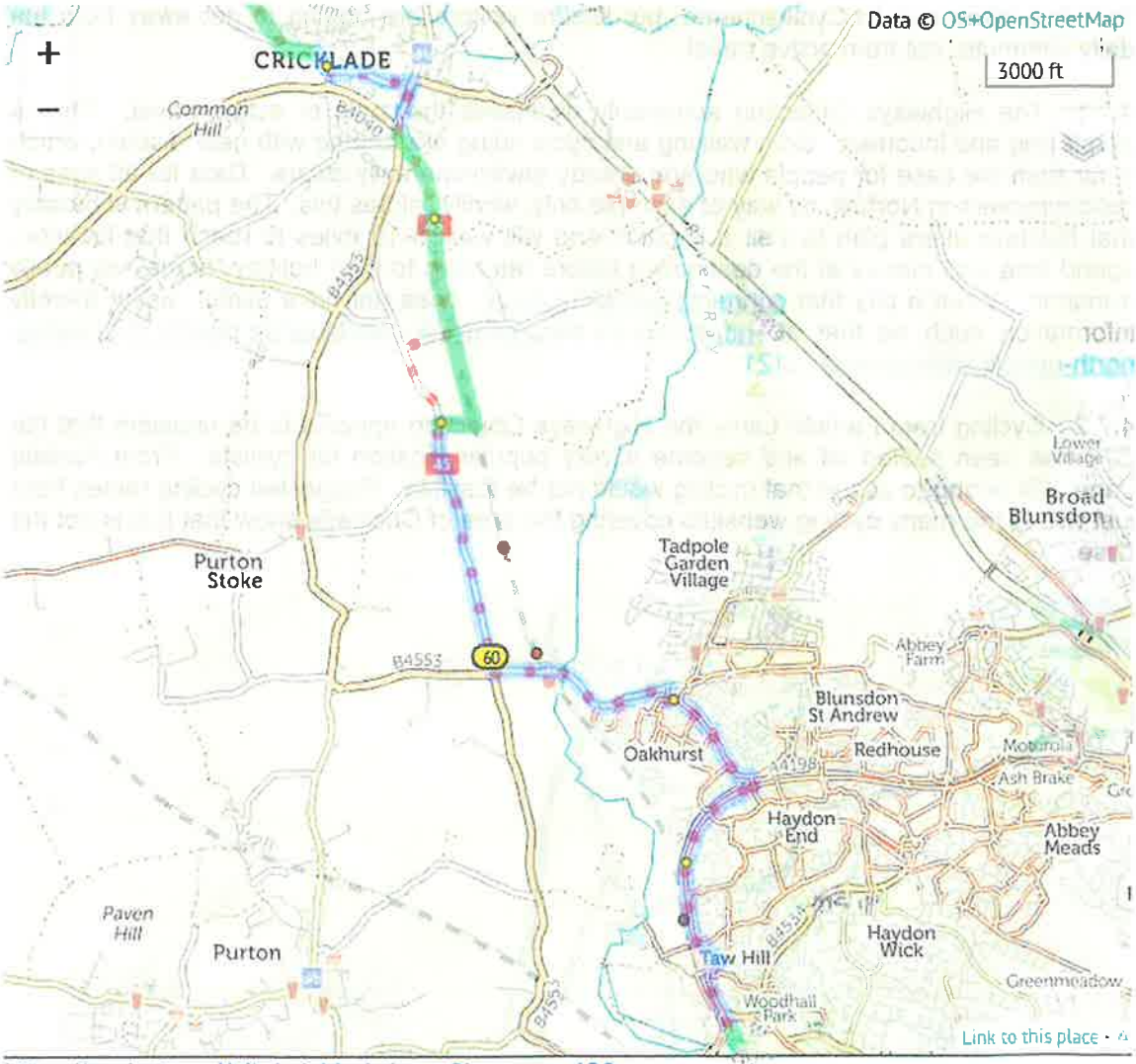
Far from being inaccessible for cyclists, Cricklade features on no less than 23 routes according to Cycle.Travel https://cycle.travel/city/cricklade/days_out

For keen cyclists, there is the route from Salisbury to Chester which takes in Swindon to Cricklade as shown below



https://cycle.travel/city/cricklade/map?journey=426

4.7.3 The cycle route along the trackbed of the Cricklade and Swindon railway, is yet a further facility readily available from Farfield Lane as are the many bridleways and byways in the vicinity.

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4.7.4 Walking is another form of exercise, pleasure and excellent way of viewing local flora and fauna, which is probably why it is so popular. The Cricklade area's footpath and Bridleway map shows just how well served Farfield Lane and the surrounding area is. From Farfield Lane, there are numerous routes available which can be used simply for an interesting and refreshing ramble or to access local villages and towns.



https://wiltscouncil.maps.arcgis.com/apps/webappviewer/index.html?id=43d5a86a545046b2b59fd7dd49d89d22

4.8.1 It is admirable that Wiltshire is bringing forward the UK Government's target date for carbon neutrality to 2030. The UK Government's latest target date is now 2050 and not 2030, while the target date for carbon reduction by 78% is now 2035.

4.8.2 We are keen to embrace achieving Wiltshire's early adoption of carbon reduction and achieving eco-targets by the earliest date, which is highly laudable. We are excited to be part of the accelerated progress towards a viable future.

4.8.3 We appreciate that this means Wiltshire's target for carbon neutrality will become ever more challenging to achieve. By one measure to encourage the environmentally aware visitor to the county, many steps towards carbon reduction are achieved. The benefits to Wiltshire and the wider UK in encouraging home tourism of relatively short journeys, to eco-friendly destinations, by visitors keen to leave a minimal footprint can only be of benefit to both the county, the region and beyond.

4.8.4 Empirical evidence of eco-village operators suggests that a proportion of visitors to eco-holiday properties is by those who are investigating and sampling eco-living with a view to adoption at home, full-time and permanently. Unfortunately data on subsequent take up,

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in full or in part is not available. Even if there are only small gains, by small numbers of the population, that is a gain overall for the whole population.

4.9.1 With respect, Paragraph 110 of the current version of NPPF applies principally to urban housing and the infrastructure plans which it is incumbent upon Local Authorities to establish.

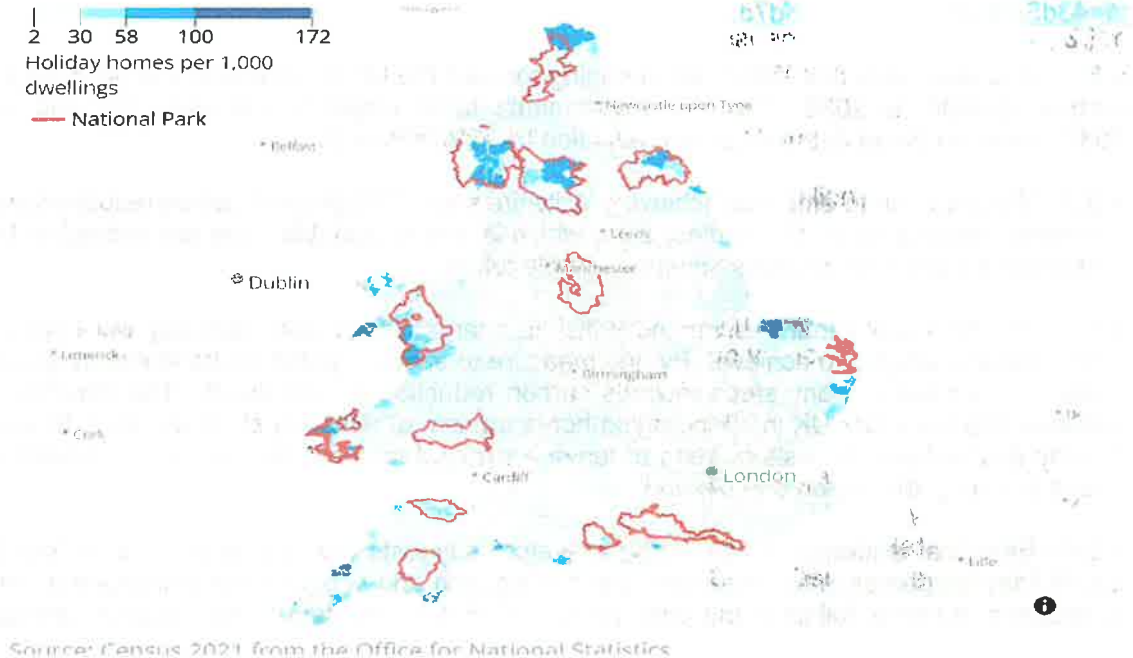
4.9.2 We accept that Paragraph 110 is therefore only peripherally relevant to the subject application for a small rural holiday eco-village. As has been shown, it is not appropriate to impute to eco-aware holiday makers, the same behaviours adopted of necessity in daily commutes and lives.

4.9.3 According to the most recent ONS data on permanent addresses of UK (England and Wales) domestic holidaymakers, most visitors limit their travel to holiday home destinations to relatively short journeys. The data shows that approximately one third of those who holiday in Wiltshire travel only from various of the London boroughs and surrounding counties, with the remaining visitors travelling from unidentified parts of England and Wales.

4.9.4 Is it more desirable to have travellers merely passing through Wiltshire to other destinations, or to cream off those who are environmentally aware to share the beauties of the county? And benefit local business at the same time?

4.9.5 Regrettably, although beautiful Wiltshire is within the South West hotspot for holiday travel, it is not yet attracting its fair share of the tourism market throughout the county:

Location of second addresses used as a holiday home, by Middle layer Super Output Area, England and Wales



Source: Census 2021 from the Office for National Statistics

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https://www.ons.gov.uk/peoplepopulationandcommunity/housing/articles/morethan1in10addressesusedasholidayhomesinsomeareasofenglandandwales/2023-06-20

https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/secondaddressesbylocationandtypecensus2021

4.10.1 Overall, it is greatly to be deprecated that Highways object to this application seemingly on the basis that Wiltshire has apparently overlooked the attraction of its northern quarter, has unsurprisingly failed to promote either this part of the county, or to promote and support sustainable travel for residents and visitors alike.

4.10.2 If due to oversight, sustainable and potentially well-supported public transport in the North of the county has been neglected or not fully supported, the argument is unfortunate. In objecting to the current application on grounds of paucity of public transport fails to grasp that the public cannot support its non-existent service. It ill behoves Wiltshire to object to sustainable holiday development on this basis.

5. Cricklade Town Council

5.1 The resolution of Cricklade Town Council refers to Wiltshire Core Strategy (2015) and to the Town Council's own Neighbourhood Plan (2018). In part 2 of the NPPF (December 2023), sets out the presumption for sustainable development and draws attention to both presumptions and when reliance can be made on Local and Neighbourhood plans; their divergence from the NPPF and the requirement for five-yearly reviews of local and neighbourhood plans to align with the NPPF.

5.2.1 Traffic and Transport - We confirm the contents of the traffic report carried out for the applicant and submitted with original documents.

5.2.2 We confirm that the issue of passing places is dealt with at paragraphs 4.4.2 and 4.4.3 above. The developer also emphasises that not only will the eco-village comprise "green" buildings, but also green tourism: in the form of visitors enjoyment of walking, biking and similarly gentle environmental presence.

5.3 The Town Council incorrectly states that there is no parking provision at the proposed development. As shown, each lodge has a carport mounted with solar panels to provide the power for the EV charging point to be installed at each property. As also shown on the application documents, there is additional parking for service purposes within the curtilage of the development. As to parking and visitor vehicles, please see sections 2.3, 4. 4 and 5. above, which comprehensively deal with the matter of additional vehicles and parking.

5.4 As to drainage and standing water, the Town Council will be familiar with Figure 11 of its Neighbourhood Plan which demonstrates that the whole site is outside Flood Risk areas 2 and 3. It is reported that a member of the public opined to the Town Council otherwise and that the site is waterlogged. As this is unsupported and factually incorrect, perhaps that person had mistaken the location of the application site. We refer to both the original drainage and the attached SuDS report with supplementary drainage plans supporting the application.

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5.5 Known data for short-term lets demonstrates the reducing of the residential property available for locals, thus exerting additional pressure on all forms of residential property. We, therefore, respectfully suggest that the member of the public who expressed the view that there is no call for purpose built holiday accommodation, supports that assertion with relevant data.

6. Victoria Fairburn

6.1 Ms Fairburn expresses concern that part of Farfield Lane east of the bridge over the former railway track is a single track route. We therefore refer her to sections 2.2, 2.3, 4.4.2 and 4.4.3 above.

6.2 Ms Fairburn also asks whether the eco village will be visible from the railway track, when the track and rail route are reinstated. She will be aware that at the present time, the reinstatement is yet to be financed and carried out. However, whether as cycleway or combined rail and cycle ways, the eastern side of the line of the former railway track is bounded by well established and mature trees and shrubs, which provide a substantial natural screen of the land to the east.

6.3 Additionally, between the North Meadow farm crossing of the former railway line to north of the Farfield Lane Bridge, the track is concealed within a cutting as specified by Swindon to Cricklade Railway, https://swindon-cricklade-railway.org/return-to-cricklade/

7. Simon Henry

We appreciate Mr Henry's time and effort in expressing several concerns in relation to the application and note that:

7.1. Holiday Accommodation - Were that the case, we would agree unreservedly with this gentleman. However, the current application is for holiday accommodation to comprise an eco-village to very high sustainable standards. As such, the application complies both with the high level NPPF framework at paragraphs 85-89 inclusive, and in particular the objective of paragraph 88 c).

7.2. The Nature of Land Use Fronting Farfield Lane – The application site lies to the south of, but not contiguous with Farfield Lane. The nature of the land use and occupation of the frontagers comprises agricultural, commercial (caravan and motorhome storage yard; holiday homes and certain other buildings); and several residential properties, for the greater part agriculture related.

7.3.1 Traffic and Transport - We confirm the contents of the traffic report carried out for the applicant and submitted with original documents. In addition, we confirm to Mr Henry too, the contents of sections, 2.2, 2.3 and 4.4.2 and 4.4.3 above.

7.3.2 The emphasis of Farfield eco-village will be on not only the "green" buildings, but also green tourism: in the form of visitors enjoyment of walking, biking and similarly gentle environmental presence.

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7.4. Drainage and Standing Water – We refer to the Flooding Report accompanying the application and also to Figure 11 of the Cricklade Neighbourhood Plan, which shows that there is no part of the application site within flood risk areas. Additionally, we would also refer to the additional SuDS report which sets out the full particulars for carrying out environmentally sensitive regeneration of the site to enhance the presence of the relative paucity of flora and fauna present at the site. Water management and regeneration are mutually beneficial.

7.5. Mr Henry's Opinions - We make no comment on this gentleman's personal opinions, not germane to the planning process.

8. Mr and Mrs P Baker

8.1 Mr and Mrs Baker express concern that part of Farfield Lane east of the bridge over the former railway track is a single track route. Again, we refer to sections 2.2, 2.3, 4.4.2 and 4.4.3 above. Which deal comprehensively with the minimal addition of vehicles coming to Farfield Lane, and relating to passing places.

8.2 We confirm again that the emphasis will not only be on highly sustainable "green" buildings, but also green tourism: in the form of visitors enjoyment of walking, biking and similarly gentle environmental presence.

9. Victoria Minion-Newby

9.1 Ms Minion-Newby refers to "Growth in Short-Term Lettings" (England) Parliament Research Paper pub 19 May 2023 by Cromatry, H https://researchbriefings.files.parliament.uk/documents/CBP-8395/CBP-8395.pdf We note that this paper specifically deals with the growth of short-term lettings of residential properties, diverting them away from conventional residential use. The paper's principal research is focused on London and only touches on the growth of the short-term rental sector outside London, referring briefly to Bristol, Edinburgh and Greater Manchester on page 14.

9.2 The paper does not address the market in purpose designed and built leisure and holiday developments and is confined only to existing residential properties diverted to short-term lettings in existing urban areas.

9.3 However, it should be noted that at section 3 "Growth in Short Term Lettings" (on pages 20-23), the research paper sets outs the benefits to communities of the The Positive Impacts of the Accommodation Sharing Economy, on pp20-23 inclusive. This deals with three areas: Positive Impacts on Consumers (3.1) ; Positive Impacts on Providers (3.2); and Positive Impacts on the Economy (3.3). The positive findings are in contrast to Ms Minion-Newby's concerns for potential negative impact of anti-social behaviour.

9.4 Finally the financial benefit to the wider economy and community cannot be overlooked. Quoting from the 2019 Sykes report Cromarty, H notes: "*The UK's short-term letting industry generated around £14 billion of spending in 2019, according to analysis by Oxford Economics, commissioned by accommodation provider Sykes Holiday Cottages*"

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9.5 The latest update of the Sykes Staycation Index 2023 predicted *that staycations could contribute an estimated £28bn to the UK's economy* (for 2023) see: https://www.sykescottages.co.uk/blog/wp-content/uploads/2023/04/Sykes-Staycation-Index-2023.pdf at p.4.

10. S Emms

10.1 We note Mr Emms' concerns that Cricklade is currently rather underplayed as a centre for Tourists despite its outstanding history and peerless architectural and cultural heritage.

10.2 Cricklade Neighbourhood Plan Policy B4 - *Proposals that would contribute towards the tourism and visitor economy will be particularly supported*, more environmentally aware visitors will undoubtedly be delighted to find the gem that is Cricklade.
https://www.cricklade towncouncil.gov.uk/wp-content/uploads/sites/115/2023/07/Cricklade_Neighbourhood_Plan_Made_March_2018.pdf

10.3 Farfield eco-village lies firmly within the parish of Cricklade and is not within either flood zones 2 or 3. This is demonstrated clearly in Figure 11 of the Neighbourhood Plan, copied below.

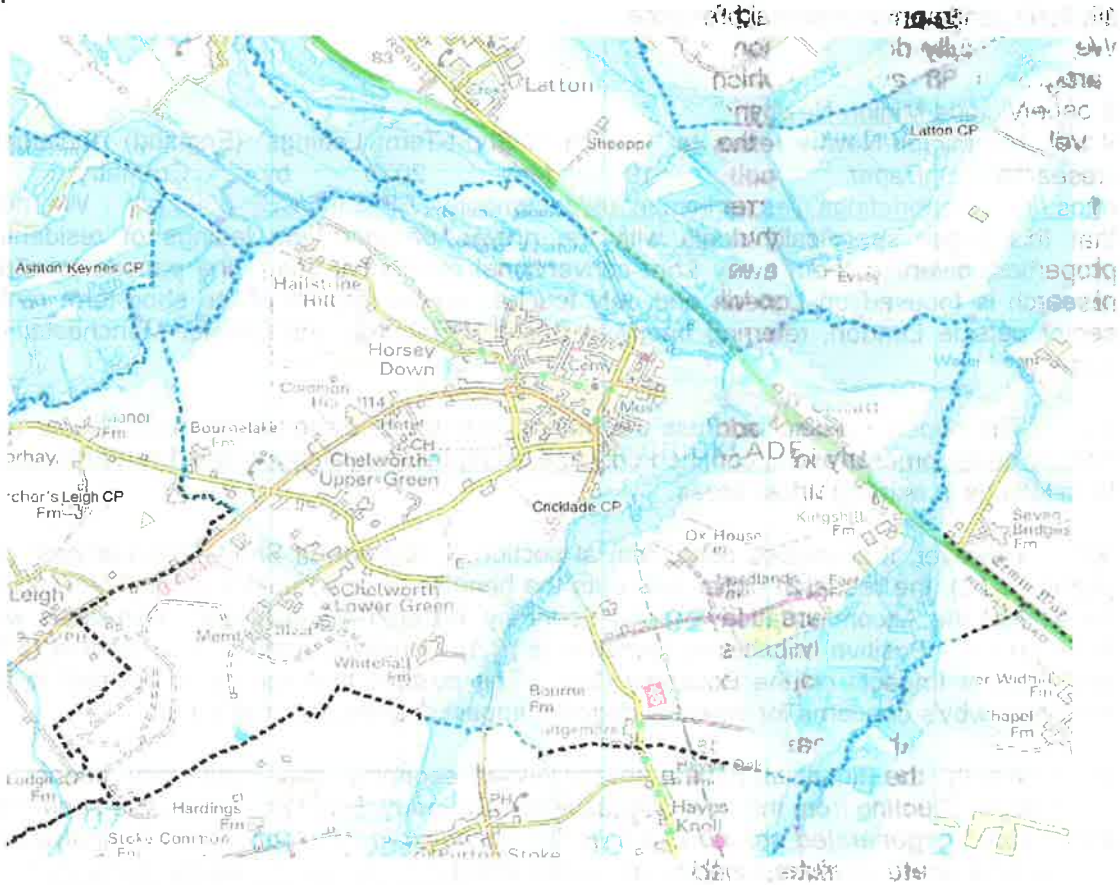

Figure 11: Flood Zones 2 and 3 around Cricklade

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10.3 We refer once more to Sections 2.2, 2.3, 4.4.2 and 4.4.3 above in dealing with observations about additional vehicles coming to Farfield eco-village, passing places along Farfield Lane and on-site eco-village parking provision. Together with the original transport report, these matters are comprehensively addressed.

10.4 We confirm once more that the emphasis will be not only on the provision of highly sustainable "green" buildings, but also green tourism: in the form of visitors enjoyment of walking, biking and similarly gentle environmental presence.

11. Kernon Countryside Consultants on behalf of Mr Freeth of Farfield Farm

11.1 Mr Freeth has gone to considerable trouble to make his anxieties known and we acknowledge the effort which Messrs Freeth and Kernon have put into their observations.

11.2 We make no comment on Introductory Paragraphs 1-4 inclusive and note the opinion expressed at Paragraph 5.

11.3 Taking the following paragraphs sequentially:

11.3.1 Paragraphs 6, 7, 8 and 9: which purport to be based on Wiltshire Core Strategy 39. We respectfully draw attention to the current (December 2023) version of NPPF Part 6 at paragraphs 88 and 89, which highlight the importance and factors for supporting a prosperous rural economy and at paragraph 88c) "sustainable rural tourism and leisure developments which respect the character of the countryside".

11.3.2 Additionally, the current NPPF states the overriding objective of sustainable development by following the three overarching objectives set out in its Paragraph 8: to obtain net gains from the: economic objective, the social objective and environmental objective. The proposed eco-village, as shown in the application documents, will be a highly sustainable development, designed in a way to maximise being as nearly off-grid as possible.

11.3.3 The proposed development is therefore in accordance with Part 2 of the NPPF objectives and similarly in accordance with Part 6 in respect of sustainable tourism and "the development and diversification of agricultural and other land-based rural business" (NPPF Para 88 b)).

11.3.4 Paragraphs 10-22 inclusive: We note that Kernon Countryside Consultants' observation which appears to lay emphasis on Wiltshire Highways purported objection to the current application. As will be seen from section 4 above, the developer identified the ways in which the Highways objection is misguided.

11.3.5 We note that it has not been possible to replicate the source of numbers relating to traffic movements claimed by Kernon Countryside Consultants from any accepted source of data.

11.3.6 We therefore refute that these are accurate and would refer to Sections, 2.2, 2.3 and the whole of section 4 above, dealing with Highways matters.

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12. I Houghton

20.1 We are grateful to Mr Houghton for expressing his opinions so unreservedly and for taking the time to respond. We have to note that not all the matters this gentleman addresses appear to coincide with the data.

12.2 With regard to the adequacy of housing for local people and the effect of short-term lettings of residential property, we refer to "Growth in Short-Term Lettings" (England) Parliament Research Paper pub 19 May 2023 by Cromarty, H , which describes generally the effects on local housing for local residents has on availability of housing and escalating prices for both purchase and residential rents in general. https://researchbriefings.files.parliament.uk/documents/CBP-8395/CBP-8395.pdf With regard to North Wiltshire in particular, we refer to our section 4 – Cricklade's Residential Housing Market – of our earlier study of Cricklade's Community and Culture.

12.3 From this it will be seen that the area's homelessness has increased to a considerable degree, such that any release of pressure from the residential housing stock by availability of properties limited to short-term and/or leisure and visitor use assists local residents.

12.4 With regard to the suitability of the Cricklade Neighbourhood for tourism and the visitor economy in and around the ancient, historic and culturally significant town, we refer again to Cricklade Neighbourhood Plan Policy B4 adopted by the Town Council.

12.5 Similarly, with regard to flooding, this does not coincide with the data provided by Cricklade Town Council shown in the Neighbourhood Plan's Figure 11 inserted above.

12.6 Finally, we refer to again to sections 2.2, 2.3, 4.4.2 and 4.4.3 above which deal with the vehicle and traffic aspects, including passing places, of the application for an eco-village at Farfield Lane.

12.7 As has been stated before, the developer's emphasis will be not only on highly sustainable "green" buildings, but also green tourism: in the form of visitors enjoyment of walking, biking and similarly gentle environmental presence.

13. Councillor Nick Dye

13.1 We note that this application has been called in by Councillor Nick Dye in reference to concern over the provision of eco-friendly holiday provision for North Wiltshire. We believe that all relevant and reasonable planning considerations have been addressed both in the original and supplementary documents lodged by the developer.

13.2 The developer is in entire agreement with Councillor Dye that there is an urgent need to promote the success of Wiltshire's Core Strategy for reaching net-zero by 2030. How better to do so than by ensuring that North Wiltshire is no longer a forgotten corner of the county and contributes positively to sustainable development, eco-friendly holiday and leisure pursuits while at the same time encouraging sustainable businesses to prosperity.

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13.3 Why should eco-aware consumers merely transit through Wiltshire on the M4 corridor, possibly polluting the Wiltshire air? When the same visitors could be diverted to enjoy and contribute to the cultural richness and economic prosperity of North Wiltshire?

14. Final Observations and Commitments on Sustainable Tourism

14.1 At a time when the current HM Government's targets for carbon reduction and net zero are shifting further into the future, we applaud Wiltshire's ambition to reach carbon balance by 2030.

14.2 Regrettably, the UK has not rejoined UN Tourism (formerly UNWTO). However, the Glasgow Declaration on Tourism in Action agreed at COP26 in November 2021 "with the objective to raise the climate ambition of tourism stakeholders and secure strong actions to support the global commitment to halve emissions by 2030 and reach Net Zero as soon as possible before 2050. Transforming tourism through climate action is crucial for the sector's competitiveness, sustainability and resilience" was and remains a very important step in the sustainable future of tourism.

14.3 We, together with our sister enterprise, The Sustainable Life, are determined to be a driving force for sustainable tourism in the UK, not only on the path to 2030 and 2050, but beyond. Our commitment to playing our part in helping the planet and its peoples survive is paramount. For this purpose, we are honoured to be able to commit to contributing to Wiltshire's aim of reaching net-zero by 2030.

14.4 We are convinced that our on-going investment in driving forward ever more sustainable tourism and adopting all viable new tools as they become available; together with our objectives of B-Corp status and partner-membership of UN Tourism, The Travel Foundation and One Planet will help us to ensure that both we and Wiltshire are at the forefront of environmentally friendly advances. Advances which will equally benefit Wiltshire's permanent residents and the county's savvy visitors.

Yours sincerely

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