

16th March 2026

**Response to Representation – Cricklade Court Leet Charity Reserved Matters Application
PL/2026/00347 – Land at Stones Farm, Cricklade**

1. Introduction

- 1.1 This note responds to the representation submitted by Cricklade Court Leet Charity dated 10th March 2026 requesting that the Reserved Matters application be called in for determination by the Strategic Planning Committee.
- 1.2 The concerns raised relate primarily to the design, effectiveness and long-term management of the proposed Habitat Support Area (HSA), which forms part of the mitigation strategy addressing potential recreational impacts on North Meadow and Clattinger Farm Special Area of Conservation (SAC).
- 1.3 It is important to emphasise at the outset that the principle and adequacy of the mitigation strategy have already been fully examined through the planning appeal process and associated Habitats Regulations Assessment (HRA).
- 1.4 Natural England, as the Government's statutory adviser on nature conservation, confirmed during the appeal that the mitigation package comprising the HSA together with Strategic Access Management and Monitoring (SAMM) contributions is sufficient to ensure that the development would not adversely affect the integrity of the SAC.
- 1.5 Natural England further confirmed that the proposed layout and management approach for the HSA are appropriate to deliver the required mitigation and can be secured through planning conditions and the Section 106 agreement.
- 1.6 Accordingly, the key issue raised in the representation namely whether the mitigation can be relied upon to protect the SAC has already been addressed through the statutory HRA process and the appeal determination framework.

2. Function and Design of the Habitat Support Area

- 2.1 The representation suggests that the HSA may not function effectively as recreational mitigation because a portion of the land is to be managed primarily for biodiversity rather than public access.

- 2.2 This interpretation does not accurately reflect the intended purpose of the HSA. The HSA has been designed to perform two complementary functions:
1. Provision of attractive alternative recreational space for local residents, particularly dog walkers; and
 2. Enhancement of semi-natural habitats adjacent to the SAC, contributing to its conservation objectives.
- 2.3 The Shadow HRA and HSA Strategy confirms that the development will provide approximately 8.3 hectares of Habitat Support Area incorporating meadow habitats, ponds, hedgerows and informal walking routes.
- 2.4 Visitor survey evidence demonstrates that the primary users of North Meadow are local dog walkers undertaking short visits, typically lasting between 30 minutes and one hour. The HSA has therefore been designed to replicate the key characteristics that influence visitor behaviour, including:
- proximity to residential areas;
 - naturalistic landscapes and open meadow habitats;
 - circular walking routes suitable for dog walking.
- 2.5 The inclusion of areas managed primarily for biodiversity enhancement does not reduce the effectiveness of the mitigation. Rather, it ensures that the HSA also contributes to the Site Improvement Plan objectives for the SAC, including restoration of semi-natural grassland and improved habitat connectivity.
3. Long-Term Management and Governance
- 3.1 Concerns are raised regarding the governance and long-term management of the HSA. These matters are addressed through the planning framework associated with the outline consent and appeal decision.
- 3.3 The HSA Strategy confirms that a detailed and costed management plan will be secured through planning conditions, ensuring that the HSA is managed in perpetuity in accordance with defined ecological and access objectives.
- 3.4 In addition, the mitigation package includes SAMM contributions which will fund visitor management, wardening, monitoring and infrastructure improvements at North Meadow itself.
- 3.5 These arrangements provide the level of certainty required under the Habitats Regulations.
4. Habitats Regulations Compliance
- 4.1 Under Regulation 63 of the Conservation of Habitats and Species Regulations 2017, the competent authority must ascertain that a proposal will not adversely affect the integrity of a European site.

4.2 Natural England has confirmed that, subject to the mitigation secured through planning conditions and the Section 106 agreement, the development may be concluded to have no adverse effect on the integrity of the North Meadow and Clattinger Farm SAC.

4.3 This represents the statutory test under the Habitats Regulations and has already been satisfied.

5. Conclusion

5.1 The issues raised by Cricklade Court Leet do not introduce new ecological evidence or technical matters that would alter the conclusions reached through the appeal process or through consultation with Natural England.

5.2 In summary:

- The adequacy of SAC mitigation has already been examined and accepted through the appeal process and HRA;
- Natural England supports the mitigation strategy, confirming that the HSA and SAMM measures appropriately address recreational impacts;
- The design, management and monitoring of the HSA are secured through planning conditions and legal agreement, ensuring long-term delivery.

5.3 Accordingly, there is no ecological or legal basis to conclude that the Reserved Matters proposals would adversely affect the integrity of the SAC.

Yours sincerely

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