



Cricklade Court Leet

The Manorial Court for the Hundred and Borough

Oliver Phippen
Planning Department
Wiltshire Council
Bythesea Road
Trowbridge
Wiltshire
BA14 8JN

26th May 2026

Dear Mr Phippen,

Mac Mic Planning Application PL/2026/02134 Land North and South of Stones Lane, and North of Malmesbury Road, Cricklade

1. Introduction

Cricklade Court Leet objects to this planning application because it does not adequately demonstrate how the proposed mitigation would avoid increased recreational pressure on North Meadow SAC.

Cricklade Court Leet Charity own part of North Meadow SAC and work with Natural England on the management of this National Nature Reserve.

Three large adjacent developments next to North Meadow SAC cannot be considered in isolation. This combination has significantly increased the scale and complexity of designing a practical and effective overall recreational pressure mitigation strategy.

The proposed mitigation strategy provides a 6.5 Ha SANG and relies on the North Meadow Interim Mitigation Strategy (NMIMS) but does not explain how visitor behaviour will be influenced by the adjoining planning applications. This raises questions as to whether the current scale and configuration of mitigation is sufficient when considered in combination to avoid adversely impacting the integrity of the SAC beyond reasonable scientific doubt.

2. Evidence on proximity-driven recreational pressure

Evidence specific to North Meadow supports the conclusion that recreational use is strongly proximity driven. The North Meadow visitor survey (Ecological Planning & Research Ltd, 2023) found that:

- 53% of all visitors originate from housing development within 1000m of North Meadow. (EPR Table 3.9)

- 75% of dog walking visits originate within 700m of North Meadow
- North Meadow is the first-choice destination for 70% of visitors
- EPR - *Figure 3.19: Cumulative frequency distribution - linear distance between site and home postcode* clearly shows the high proportion of visitors living close to North Meadow.

This demonstrates that routine recreational use is dominated by nearby residential development and that the site functions as a primary local destination.

This pattern is consistent with the wider evidence base. The Footprint Ecology work at Burnham Beeches SAC demonstrates that recreational use declines sharply with distance, with:

- a single dwelling at 0.5 km generating similar visit pressure to 8 dwellings at 2 km, 57 dwellings at 4km and 81 dwellings at 5.6 km

(Footprint Ecology, Burnham Beeches Recreation Report, 2019)

This establishes that recreational pressure is not evenly distributed but is heavily concentrated close to the site and declines exponentially with distance from the SAC.

North Meadow SAC is already under pressure as evidenced by Natural England's decision to close the site to the public for several weeks in each of the last 4 years to avoid irreversible soil compaction and trampling. This indicates the ability of North Meadow SAC to absorb additional visitors is extremely limited, reinforcing the need for mitigation close to the SAC to be effective and demonstrably deliverable.

Natural England's latest condition assessments indicate continuing ecological sensitivity within the SAC. The Lowland Neutral Grassland (MG4) feature was updated to "**Unfavourable – Declining**" on 17 September 2025 and the *Fritillaria meleagris* feature to "**Unfavourable – Recovering**" on 17 March 2026. Natural England's condition assessment states that failure of the site is due to hydrological impacts and recreational pressures including trampling, nutrient enrichment and erosion rather than inadequate management.

This increases the importance of demonstrating that proposed mitigation would genuinely reduce rather than merely redistribute recreational pressure within the wider landscape surrounding the SAC.

3. Why this proposal cannot be considered in isolation

The Mac Mic Shadow Habitat Regulations Assessment (sHRA) identifies likely significant effects from increased recreational pressure resulting from adjacent development (page 15). Section 4.5 *Specific Consideration for the In-Combination Test* concludes these effects can be avoided or fully mitigated by the mitigation measures described in the Mac Mic sHSA.

The sHRA identifies likely significant recreational effects but does not appear to undertake any detailed site-specific analysis of how visitor behaviour would be altered in practice by the proposed mitigation layout. The sHRA does not explain how the practical interaction between the proposed mitigation areas, the Thames Path, adjacent rights of way, constrained river crossings and the principal SAC entrance has been assessed.

The sHRA appears to assume that compliance with the NMIMS automatically resolves in-combination recreational effects but does not explain how mitigation effectiveness has been demonstrated in the specific spatial circumstances of these adjacent developments.

In combination issues related to the Newland Development

The Mac Mic SANG is next to the Newland HSA separated only by the old railway line. Whilst no direct connection is shown there is easy access between the two locations and the Ramblers Association have already requested a direct path in their consultation submission.

The Newland HSA links the Mac Mic SANG to North Meadow SAC and may act as a funnel drawing visitors towards North Meadow SAC reducing the mitigation effectiveness of the Mac Mic SANG. It is necessary to understand how the combined influence of the Mac Mic SANG and the Newland HSA will avoid an increase in visitors to North Meadow SAC. The effectiveness of each mitigation area therefore cannot be understood independently of the adjacent schemes.

In combination issues related to the Bloor Development

The Bloor Development by being directly adjacent to the Mac Mic development increases the size of the combined development. This raises questions as to whether the current scale and configuration of mitigation is sufficient when considered in combination.

Cumulative Scale of Development

Based on the 2021 census there are 1612 houses within 1000m of North Meadow SAC. The three adjacent developments total 504 houses within 1000m of North Meadow SAC which is a 31% increase. This scale of development in Cricklade appears likely to represent a material change in the assumptions underlying the NMIMS strategy and raises questions as to whether the current mitigation approach remains adequate.

4. Interaction with existing recreational landscape and route network

The accompanying plan demonstrates that the proposed mitigation areas, Thames Path, Bridleway, Sustrans Route 45, Rights of way and principal access point into North Meadow SAC form a highly interconnected recreational landscape. The River Thames constrains movement northward and channels pedestrian access toward the principal SAC entrance. The sHRA does not explain how these route relationships and visitor movement patterns have been assessed when concluding that the proposed mitigation would fully avoid increased recreational pressure on the SAC.

The Design and Access Statement places strong emphasis on connected recreational routes and integrated green infrastructure across the development area but does not explain how these connections interact with the Thames Path, adjacent mitigation land and the principal access route into North Meadow SAC.

The application documents appear to place significant reliance on the assumption that provision of recreational land would resolve recreational pressure. There is a lack of detailed site-specific behavioural analysis explaining why the proposed mitigation would genuinely divert recreational use away from North Meadow SAC in this unusually interconnected spatial setting.

The Thames Path is itself a nationally important recreational route and already provides direct connectivity to North Meadow SAC. The sHRA does not explain how interaction between new residents, the proposed mitigation areas and this existing recreational corridor has been assessed.

5. Problems with the current mitigation approach

Considering each of these developments in isolation and applying the NMIMS separately to each makes resolution of the in-combination effects very difficult. Taking the view that if each development provides its own mitigation there will be no in combination effects may not be realistic once the location-specific practicalities of visitor movement and route interaction are considered. North Meadow visitor behaviour needs to be understood in the context of the mitigation design for each development and the wider network of paths and rights of way adjacent to North Meadow SAC.

The effectiveness of recreational mitigation is likely to depend significantly on scale, coherence, separation from the SAC and the extent to which mitigation areas function as genuine alternative recreational destinations rather than extensions of existing SAC access routes.

The Newland Reserved Matters Application has highlighted difficulties in translating an outline planning concept into a practical design. Access to the Newland 8 ha Biodiversity HSA from the Newland housing development has been removed as has the circular path. The Biodiversity HSA may no longer have a role in recreational pressure mitigation. This is a material change in the mitigation design and avoiding increased visitors to North Meadow SAC from the scheme now depends entirely on the 2.9ha Recreation HSA, thus questioning the adequacy of the mitigation design.

The high level of proximity-driven recreational pressure from these three developments means it is critical for mitigation provision to be demonstrably effective. Its effectiveness cannot simply be assumed in the absence of supporting evidence.

6. Concerns regarding effectiveness of the Mac Mic SANG

Creating a SANG immediately adjacent to an SAC raises particular challenges because diverting visitors from the SAC depends heavily on the relative attractiveness of the SANG compared to the SAC.

The proposed 1.6km circular route appears materially shorter than the circular walking distances generally associated with Natural England SANG guidance, typically 2.3km. The SANG is also split into two roughly equal parts by Stones Lane. This may compromise the attractiveness of the SANG and its ability to divert potential visitors to North Meadow SAC.

These design issues create uncertainty about the effectiveness of the SANG in practice.

7. Overall HRA implications

The Habitat Regulations require effective mitigation to be delivered by these three proposed housing developments such that recreational pressure impact on North Meadow SAC can be ruled out beyond reasonable scientific doubt.

Habitat Regulations also require a precautionary approach, and mitigation effectiveness cannot be assumed without evidential support.

There is currently a lack of clarity on how the three mitigation proposals interact both with each other and the wider network of walking routes. Without this understanding it cannot currently be concluded beyond reasonable scientific doubt that adverse effects on the integrity of North Meadow SAC would be avoided.

The issue is not whether mitigation exists in principle, but whether the practical operation of multiple adjacent mitigation areas within a constrained and interconnected recreational landscape has been demonstrated to avoid increased recreational pressure on North Meadow SAC beyond reasonable scientific doubt.

Yours sincerely,



Clive Smith B.Ed (Hons), C.Ed.
High Bailiff

John Barratt BSc (Hons) Env Sci
Court Hayward

Copy To:

Niall Machin - Ecology Manager, Wiltshire Council
Joe Richardson – Planning Officer Wiltshire Council
Cllr Mark Clarke - Chairman Cricklade Town Council
Cllr Nick Dye - Wiltshire Councillor for Cricklade, Latton & Marston Meysey
Dr Roz Savage MP - South Cotswolds constituency (Case Ref: RS6167)
Nick Squirrel - Senior Officer Conservation and Planning Natural England
Alice James - Senior Reserve Manager Natural England

Appendices:

1. Map of Proposed Development of 504 houses next to North Meadow SAC
2. North Meadow, Cricklade Visitor Questionnaire Survey Ecological Planning & Research Ltd, 2023
3. Liley, D. (2019). Impacts of urban development at Burnham Beeches SAC: update of evidence and potential housing growth, 2019. Unpublished report by Footprint Ecology for Chiltern and South Bucks Councils. Footprint Ecology, Burnham Beeches Recreation Report, 2019.

References:

1. North Meadow SAC Condition Assessment
<https://designatedsites.naturalengland.org.uk/SiteFeatureCondition.aspx?SiteCode=S1002417&SiteName=North%20Meadow,%20Cricklade%20SSSI> Accessed 14 May 2026

Cricklade Court Leet Charity, a Charitable Incorporated Organisation registered in England,

Registered Charity No. 1179807,

Registered Office 19 Manor Orchard Cricklade SN6 6EA

The Manorial Court of the Hundred and Borough of Cricklade

www.crickladecourtleet.org.uk

Proposed Development of
504 Houses next to
North Meadow SAC

