

247 Stones Farm, Cricklade Reserved Matters Application Consultee Comment Response
29.06.2026

Dear Joe,

Please find below the collective consultee comments made during the course of the Reserved Matters application to date.

Our response has been provided in **green** below each relevant comment. Please note a large proportion of comments received have little bearing on the Reserved Matters (conditions 3 and 7).

As part of the Reserved Matters application (which included details of the appearance, landscaping, layout and scale) we also sought the acknowledged compliance with conditions 4 and 12.

As you will appreciate the outline application (PL/2022/02452) contained a raft of conditions. These are intended to be submitted following the determination of the Reserved Matters. Where applicable we have noted the specific conditions in question.

The exception to this rule is the Habitat Management and Maintenance Plan (HMMP for Condition 16) and; Ecological Management Plan (LEMP for Condition 17) which were provided for your consideration following the express request. Revised versions following comment and general drawing submission revisions will be issued shortly.

We trust given information to address conditions 16 and 17 has been provided at request, in advance of when they would typically be submitted, that these conditions also form part of the Reserved Matters. Rather than requiring the need to re-discharge the noted conditions separately again, with identical information.

North Wiltshire Swifts' | Comment Number: WC-26-01-361492 | Dated: 27.01.2026

North Wiltshire Swifts has reviewed this Reserved Matters application as all new developments should provide habitat opportunities for those species such as swifts who prefer, or can adapt to, the built environment. Swifts in the UK are on the Birds of Conservation Concern (BoCC) Red List and are classified as Endangered on the IUCN Red List assessment of extinction risk for Great Britain. Their numbers declined by 74% since 1994. They are also listed by WSBRC as a Wiltshire Critical Species. Our comments are impartial observations, neither supporting nor objecting to the application.

Swifts need a 'built environment' in which to nest so they are an ideal species to introduce wildlife and biodiversity into a new development.

A condition was set in the Appeal approval for the Outline planning submission (PL/2022/02452): 16) No part of the development hereby permitted shall be occupied until a detailed Habitat Support Area Management Plan and an Ecological Parameters Plan has been submitted to and approved in writing by the local planning authority. The approved Habitat Support Area shall be implemented prior to first occupation, and the development shall be carried out in strict accordance with the approved details for the lifetime of the development.

All ecological reports submitted with the outline application PL/2022/02452 are now out of date and no details of ecological enhancements are included in this Reserved Matters application.

A Reserved Matters application of this size should be accompanied by a LEMP/ecological report/or other document clearly defining the ecological enhancements that will be included, the type, numbers, location etc. These details should be clearly shown on an enforceable plan (e.g., site plan/technical elevations drawing) to ensure and enable compliance. (Reason: Wild Justice's Lost Nature Report - Researchers at Sheffield University looked at 6,000 houses on 42 developments and their results show that the majority of conditioned/legally binding ecological enhancements are not installed <https://wildjustice.org.uk/general/lost-nature-report/> eg 25% of bird provisions were installed).

We recommend the inclusion of integrated swift/universal bird bricks as one simple and cost-effective way of increasing wildlife and biodiversity. Swift/universal bricks are used by a variety of birds, including 4 red-listed species as well as other small birds such as blue tits and great tits.

Best practice ratio of 1 integrated bird brick per dwelling is supported both nationally and locally by:

- National Planning Practice Guidance has recently been updated (see 017 Reference ID: 8-017-20250609 How can developments incorporate features which support priority or threatened species?), and states:

"The National Planning Policy Framework expects development proposals to bolster wildlife by incorporating features which support priority or threatened species such as swifts, bats and hedgehogs.

The use of swift bricks is particularly important in this context because swifts rely on urban cavities for nesting, and the national loss of suitable nesting sites through building renovation has been part of the reason for the species' decline. Developments should include integrated nest boxes (commonly known as swift bricks) where possible, with the general aim across a development of a minimum of one nest box per unit. Nest boxes can provide important habitat for other species as well as swifts, such as starlings and sparrows.

Extensive guidance is available on wildlife friendly features, including the National Design Guide and National Model Design Code which illustrate how well-designed places can support rich and varied biodiversity by facilitating habitats and routes for wildlife. More specific support for the selection and installation of swift bricks can be found in the British Industry Standard BS 42021:2022 the Future Homes Hub Homes for Nature Guidance, and the RSPB's Guide to Nestboxes.

<https://www.gov.uk/guidance/natural-environment>"

- Wiltshire Council also supports the inclusion of swift nesting provision as can be seen in their Local Plan Pre-Submission Draft (Cabinet Version) 2020-2038 September 2023

<https://www.wiltshire.gov.uk/media/11976/Wiltshire-Local-Plan-Pre-Submission-Draft-2020-2038-Regulation->

[19/pdf/Wiltshire_Local_Plan_Reg_19_web_accessible_version.pdf?m=638313273627430000](https://www.wiltshire.gov.uk/media/11976/Wiltshire-Local-Plan-Pre-Submission-Draft-2020-2038-Regulation-19/pdf/Wiltshire_Local_Plan_Reg_19_web_accessible_version.pdf?m=638313273627430000) , page 243, 5.136: 'Designing in space for nature is critical as highlighted by recent population trends of some of the UK's most threatened species that inhabit our built environment. The recent BS 42021:2022 guidance should be followed with regards to integral nest boxes, with the exception of the minimum required ratio of integral nest boxes to dwelling given this policy outlines a greater minimum ratio than that stated within The British Standard. The British Standard has demonstrated high occupancy rates of such features and Wiltshire Council seeks to ensure the best outcomes for wildlife within the built environment. The advice of a professional ecologist should be sought when determining the appropriate boxes for the area.'

Policy 88 Biodiversity and Geodiversity (page 246) – Biodiversity in the Built Environment: ‘As a minimum, the following are required within new proposals: ...1. integrate integral bird nest bricks (e.g., swift bricks) at a minimum of two per dwelling;’

- Wiltshire & Swindon LNRS https://www.wiltshire.gov.uk/media/18289/Local-Nature-Recovery-Strategy-for-Wiltshire-and-Swindon/pdf/Revised_Copy_of_Local_Nature_Recovery_Strategy_for_Wiltshire_and_Swindon_landscape-compressed_1.pdf?m=1762355778637

Pg 94 Code TBEh Install and maintain bird and bat boxes. Each new residential unit should include built-in nesting and roosting features in line with BS 402021:2022, ideally positioned on north or east-facing walls and near vegetation. To provide nesting and roosting sites, as bird bricks support a variety of rare species.

Pg 161 16.5 Priorities for Non-Mapped Species - Many species which fulfilled the criteria for being a priority species fit neatly within certain habitat types and therefore the decision was taken not to map these, but to identify the bespoke actions which are required to support their populations within Wiltshire within the mapped habitats. The below table lists out the species and the habitats in which they are found.

Swift (*Apus apus*) - Species Action: Install a minimum of 1 integrated brick per residential unit spread across a development following best practice guidance such as BS42021, on north and east elevations or shaded under eaves where possible, especially on new builds and protect old buildings with nest colonies. See: Woodland Trust website

- BS 42021 Integral nest boxes - Selection and installation for new developments - details the information required to be submitted to the LPA including an installation plan (clause 9.2) which requires that: ‘Details for the selection, siting, positioning and installation of integral nest boxes shall be prepared and submitted to the local planning authority’. These details include amongst others, the total number of boxes to be installed on the site; a site plan showing the locations of the building into which the boxes will be installed; and, building elevations showing the positions of the boxes. In practice this means that some dwellings have more than one box while others might contain none as some locations on a development are much more suitable than others. Development schemes may also include external nest boxes to support other species, such as kestrels, owls, swallows and house martins, whilst these are welcomed, they are counted by BS42021 as additional to the ratio of 1:1 for integrated boxes. The standard also covers demonstration of compliance. (BS 42021 Integral nest boxes. Selection and installation for new developments

<https://knowledge.bsigroup.com/search?query=BS42021&type=products>).

- BS42021 has also been endorsed by the NHBC in NF89 Biodiversity in new housing developments <https://www.nhbc.co.uk/binaries/content/assets/nhbc/foundation/biodiversity-in-new-housing-developments.pdf> page 42. “Fitting at a ratio of 1 nest brick per house across the development will ensure sufficient nest sites for colonial species. 3-5 can be located in one house, so helping locate them in suitable locations for access to foraging habitat. The British Standard BS42021 sets out details on nest box installation for the above species into domestic and commercial properties We request that the LPA conditions BS42021 (including post-construction compliance process) with at least one integrated swift/universal brick per dwelling (ie 140 integrated bricks) spread across this development, with photographic evidence or ecologists report required to discharge the condition. Details should be clearly shown on an enforceable plan (e.g., site plan/technical elevations drawing) to ensure and enable compliance.

Integrated nesting bricks are preferred to external boxes for reasons of longevity, reduced maintenance, better temperature regulation with future climate change in mind, and aesthetic integration with the building design. They are also less prone to predation. Ideally the bricks should be in clusters of 2-3 in the north, east and west gable ends or close under the eaves away from windows and doors at a height of 4m+, with clear flight access and no protruding ground floor roofs such as garages

If there is a need to exclude starlings from a particular area the entrance hole should ideally be no larger than 65mm x 28mm tall. Whilst there is a need to provide nesting provision for the starling, care should be taken where such provision is sited as starlings can be messy birds and perhaps cause a nuisance to residents unless the site of the nesting provision has been thoughtfully chosen.

Swift bricks in Wiltshire's planning context:

- The swift was listed in Wiltshire & Swindon Biological Records Centre (WSBRC) Wiltshire's Critical Species Report March 2023 (pg 46). <https://www.wsbr.org/projects/wiltshires-critical-species/>

- Local Plan Pre-Submission Draft (Cabinet Version) 2020-2038 September 2023

[https://www.wiltshire.gov.uk/media/11976/Wiltshire-Local-Plan-Pre-Submission-Draft-2020-2038-Regulation-](https://www.wiltshire.gov.uk/media/11976/Wiltshire-Local-Plan-Pre-Submission-Draft-2020-2038-Regulation-19/pdf/Wiltshire_Local_Plan_Reg_19_web_accessible_version.pdf?m=638313273627430000)

[19/pdf/Wiltshire_Local_Plan_Reg_19_web_accessible_version.pdf?m=638313273627430000](https://www.wiltshire.gov.uk/media/11976/Wiltshire-Local-Plan-Pre-Submission-Draft-2020-2038-Regulation-19/pdf/Wiltshire_Local_Plan_Reg_19_web_accessible_version.pdf?m=638313273627430000)

See above for detail.

- Local Plan Pre-Submission Draft (Cabinet Version) 2020-2038 September 2023

Policy 89 Biodiversity net gain - Development must achieve a minimum of 20% biodiversity net gain, or higher as stipulated in national legislation and/or policy or supplementary guidance, over the pre-development biodiversity value as measured by the latest Biodiversity Metric. Exempted development must achieve no net loss of biodiversity and should achieve appropriate net gains, aspiring to deliver at least 20% biodiversity net gain.

- Wiltshire Design Guide v9 15/03/2024 Final Report (pg 57)

[https://www.wiltshire.gov.uk/media/13006/Wiltshire-Design-Guide-](https://www.wiltshire.gov.uk/media/13006/Wiltshire-Design-Guide-2024/pdf/8320_WiltshireDesignGuide_Consultation_Accessible.pdf?m=1711382742703)

[2024/pdf/8320_WiltshireDesignGuide_Consultation_Accessible.pdf?m=1711382742703](https://www.wiltshire.gov.uk/media/13006/Wiltshire-Design-Guide-2024/pdf/8320_WiltshireDesignGuide_Consultation_Accessible.pdf?m=1711382742703)

6.6 Expectation: Support rich and varied biodiversity:

6.6.1 Integral bat roosting features and/or universal bird bricks should be included for bats and building reliant birds at a rate of two per house. A dedicated plan should show the location of these features. The advice of a professional ecologist should be sought when determining the appropriate boxes for the area. Please consult BS 42021:22 Integral Nest Boxes – Selection and Installation for New Developments as a reference for new developments.

Page 98: Information that will help enable an effective urban design assessment including a description of information expected and reason - 33. Accommodating wildlife: Elevation drawings illustrating where integral swift and bat bricks are to be fitted into external walls, and site layout plans illustrating where hedgehog and wildlife corridors are being proposed and linked to existing GI should be included in addition to other ecological information required. (See Wiltshire Council's website for details).

- Wiltshire Council's Core Strategy policy CP50 states: 'All development should seek opportunities to enhance biodiversity. Major development in particular must include measures to deliver biodiversity gains through opportunities to restore, enhance and create valuable habitats, ecological networks and ecosystem services.'

- Wiltshire Planning and Building Control - Biodiversity and Development: Examples of habitat enhancement: <https://www.wiltshire.gov.uk/planning-bio-habitat-enhancement> lists swifts amongst other species and suggests 'Incorporating nest boxes into the fabric of a building ensures the longevity and safety of the box and minimises maintenance needs and visual impact.'

Swift Conservation websites

Swift Conservation - <https://www.swift-conservation.org/>

Action for Swifts - <https://www.actionforswifts.com/>

RSPB - <https://www.rspb.org.uk/birds-and-wildlife/wildlife-guides/bird-a-z/swift/>

RSPB Swift Mapper - <https://www.swiftmapper.org.uk/>

Condition 17 (Landscape and Ecological Management Plan (LEMP)) of the Outline planning application (PL/2022/02452) will be submitted following the determination of the Reserved Matters, which will address all relevant comments.

Drainage | Comment Number: WC-26-01-361580 | Dated: 28.01.2026

No Objection - Subject to Condition.

Refer to PL 2026 00347 SW Drainage Response v1 Issue.pdf

Context

In planning terms, flood risk refers to the potential for development to increase the likelihood or severity of flooding on-site or elsewhere, while drainage considerations relate to the capacity of the site and surrounding infrastructure to manage surface water runoff in a sustainable and effective manner.

The local planning authority must be satisfied that the proposed development will not increase flood risk, either on-site or elsewhere, and that surface water will be managed in a sustainable and coordinated manner.

Where necessary, planning conditions or legal agreements may be used to secure the implementation, maintenance, and monitoring of SuDS and other drainage infrastructure.

In September 2023, the LLFA

1. Recommended that the FFLs were set a minimum of 150mm above nearest SW cover level.
2. Required that the applicant provide:
 - a. Calculations and drawings for the drainage system design showing conveyance routes are designed to convey without flooding the critical 1 in 30 year rainfall event.
 - b. Calculations and drawings for the drainage system design showing attenuation features are designed to attenuate without flooding the critical 1 in 100 year rainfall event + climate change.
3. Required that the applicant change the design to reflect a hydrobrake that is limited to the 1 in 1 year rate of 9.4 l/s.

There is spare capacity within the existing design to achieve 9.4 l/s, without changing the design or size of storage on site. The attenuation pond design will therefore remain the same yet still achieve the rates required.

4. Required that the applicant undertake a sensitivity analysis on the network considering surcharged outfall conditions.
5. Required that the applicant provide calculations which demonstrate that the required 20% betterment against greenfield rates has been achieved for all storm events between the 1 in 1 year and the 1 in 100 year return period storm events.
6. Required that the applicant provide evidence of permissions to cross third party land and permissions from riparian owners to discharge to the watercourse/river in perpetuity. There is no automatic right to cross third party land or discharge to a watercourse/river not in ownership of the applicant.
7. Required that the applicant provide an agreement for the discharge in 3rd part land in perpetuity.

Assessment

Whilst the LLFA has no comment to make specifically with reference to the Approval of Reserved Matters (Appearance, Landscaping, Layout and Scale) we require that the requirements set out in 2023 are pursued and the information provided.

Recommendation

No objection subject to the following conditions

1. The applicant is to ensure that the FFLs were set a minimum of 150mm above nearest SW cover level.
2. The applicant must provide:
 - c. Calculations and drawings for the drainage system design showing conveyance routes are designed to convey without flooding the critical 1 in 30 year rainfall event.
 - d. Calculations and drawings for the drainage system design showing attenuation features are designed to attenuate without flooding the critical 1 in 100 year rainfall event + climate change.
2. The applicant must provide cross sections of the proposed attenuation feature and flow control chamber details.
3. The applicant must change the design to reflect a hydrobrake that is limited to the 1in 1 year rate of 9.4 l/s.
4. The applicant must undertake a sensitivity analysis on the network considering surcharged outfall conditions.
5. The applicant must provide calculations which demonstrate that the required 20% betterment against greenfield rates has been achieved for all storm events between the 1 in 1 year and the 1 in 100year return period storm events.
6. The applicant must provide evidence of permissions to cross third party land and permissions from riparian owners to discharge to the watercourse/river in perpetuity. There is no automatic right to cross third party land or discharge to a watercourse/river not in ownership of the applicant.
7. The applicant must provide an agreement for the discharge in 3rd part land in perpetuity.
8. The applicant shall provide a Construction Management Plan demonstrating how flood risk and pollution risk will be fully managed in accordance with best practice and statutory guidance

Informative

Prior to discharge to the River Thames, the applicant must obtain an Environmental Permit from the Environment Agency.

Prior to any works commencing on the upstream drainage network, the approved outfall structure and flow control device shall be fully constructed, tested, and commissioned. No discharge to the receiving system (including watercourses, waterbodies, sewers, or drains) shall occur until these measures are operational to ensure compliance with agreed discharge rates and prevent an increase in flood risk elsewhere

Condition 14 (Detailed drainage scheme, Floor Risk Assessment (FRA) and Drainage Strategy) and **Condition 22** (Foul Water Drainage) of the Outline planning application (PL/2022/02452) will be submitted following the determination of the Reserved Matters, which will address all relevant comments.

Access to waste collection services:

I attach a guidance document setting out the council's technical requirements to ensure that residents will be able to use the standard waste collection service. In general terms, following the attached guidance will allow the service to operate as intended and generally will mean that plans are acceptable to the waste management services team. The following paragraphs highlight some areas that would need to be addressed at the next stage of an application.

Vehicle access

If applicable Vehicle tracking is required to demonstrate that refuse collection vehicles (RCVs) can move through the development and turn at the ends of roads, especially taking account of cars parked in allocated spaces and at the roadside. Adequate turning room should be provided to take account of the restrictions on carry distances for residents set out in Part H of Building Regulations (25m), the limitations on carry distances for waste collection crews, where the vehicle should be able to stop within 10m of a collection point (see section 4.4 of the attached guidance) and due to the requirement to minimise reversing to meet the requirements of BS 5906:2005. Tracking on plans in future submissions should demonstrate the sufficiency of vehicle access.

The council requires an indemnity in order to operate on any roads that are not adopted, including during any period where the council needs to deliver waste collection services prior to adoption. The required arrangements are set out in section 5.8 of the attached guidance with a sample indemnity provided in Appendix C.

Issue: Tracking is not yet shown on the plan.

Tracking information was submitted as part of the Reserved Matters. Please refer to the below drawings:

- 247-131-1__Swept Path Plans
- 247-131-2__Swept Path Plans
- 247-131-3__Swept Path Plans
- 247-131-4__Swept Path Plans
- 247-131-500__Swept Path Plans

Following consultee comments, these drawings have been updated.

Collection points

Each dwelling should have a collection point that is on level hardstanding off any roadway or footway at the curtilage of the property, as further described in section 5.2 of the waste SPD. Plans should identify these areas for each dwelling and demonstrate that they do not impact on space available on driveways and that soft landscaping won't prevent or encumber the collection crew when emptying bins.

Issue: Presentation point needs to be identified and marked on the plan.

Drawings have been updated to accommodate comments. Please refer to drawing:

- 247-RSP - Refuse Strategy Plan

Storage points

In accordance with the guidance in section 5.4 of the waste SPD, plans in future submissions should demonstrate that each property has suitable storage space that takes account of the guidance. Showing containers to scale in situ will help to demonstrate compliance.

Note: Sufficient storage will be required for the introduction of new waste services which are planned for 2027, including food waste and soft plastic/bags.

Issue: Storage point needs to be identified and marked on the plan.

Drawings have been updated to accommodate comments. Please refer to drawing:

- 247-RSP - Refuse Strategy Plan

Routes between storage and collection points

As noted in the 'Vehicle access' section above, residents should not have to carry their waste containers more than 25m from the storage point to the collection point. Plans should demonstrate that this is achievable for each dwelling, preferably with a supplementary table listing the carry distances per dwelling, for ease of reference. Section 5.3 of the waste SPD provides further details on matters to consider when designating these routes.

Drawings have been updated to accommodate comments. Please refer to drawing:

- 247-RSP - Refuse Strategy Plan

Conditions

In principal Waste Management Team support this application with the following conditions:

1. Vehicle tracking is required to demonstrate that refuse collection vehicles (RCVs) can move through the development and turn at the ends of roads, especially taking account of cars parked in allocated spaces and at the roadside.
2. Presentation point needs to be identified.
3. Guidance from the SPD
4. Bin storage points for houses are required.
5. Guidance notes regarding introduction of additional waste services planned for 2027 which will require additional space.

S106 contribution of £16,100 toward waste and recycling containers.

Waste and Recycling contributions have already been secured through the signed s106.

Highway | Comment Number: WC-26-02-363998 | Dated: 20.02.2026

The access to the proposed development was not approved in detail at outline stage as all matters were reserved at the time of the granting of permission. There is no principal objection to the development in highway terms.

Appeal Ref: APP/Y3940/W/24/3351265

Land at Stones Farm, West Mill Lane, Cricklade SN6 6JL

*'The appeal is allowed and planning permission is granted for Outline application for the erection of up to 140 dwellings, a habitat support area and associated landscaping and works. **Access not reserved** at Land at Stones Farm, West Mill Lane, Cricklade SN6 6JL in accordance with the terms of the application, Ref PL/2022/02452, subject to the conditions in the attached schedule.'*

Having regard for the above I would raise the following questions regarding the submitted plans.

Design and Layout

The access is an extension of Jenners Yard which is subject to an agreement as an adoptable road which will form a priority access junction for the development. The development can be completed to conform with the requirements to operate as a 20-mph zone with signs placed at the junction of

Jenners Yard and West Mill Lane. This will be formalised via a TRO which will be funded by the developer.

All visibility splays should conform with standard for a design speed of 20-mph and should provide splays measuring 2.4m by 25 m to the nearside carriageway edge. This should be achieved by all side roads and private drives. Regarding specific details in the plans:

- The visibility splay from the junction of the private road falls across the allocated parking for Plot 138
- Visibility splay to the right of private road across parking for Plot 120
- Tree to right of shared drive of Plots 106 & 107 within visibility splay
- Visibility to be shown as achievable from private shared drive 106/107
- Visibility splay from side road between Plots 41-51 across the frontage of Plot 51 and should be demonstrated that it can achieve 2.4 m by 25 m clear of obstruction
- Splays from Plots 14 & 15 across frontages and to be demonstrated or secured
- Splays to 2.4m by 25m at side road and Plot 92
- Splays across frontages of Plots 57 & 58
- Visibility splays across Plots 54, 55 and 56 and from the junction across Plot 56 required to demonstrate 2.4 m by 25 m
- Visibility from private drive at Plot 70

Drawings have been updated to accommodate comments. Please refer to drawing:

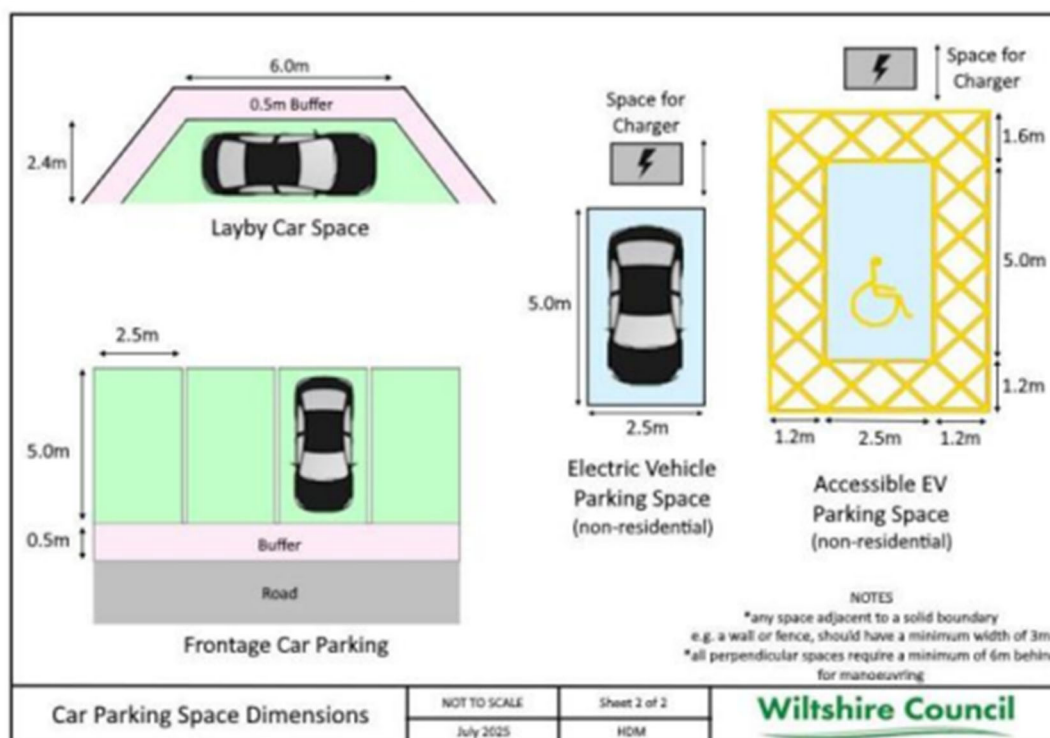
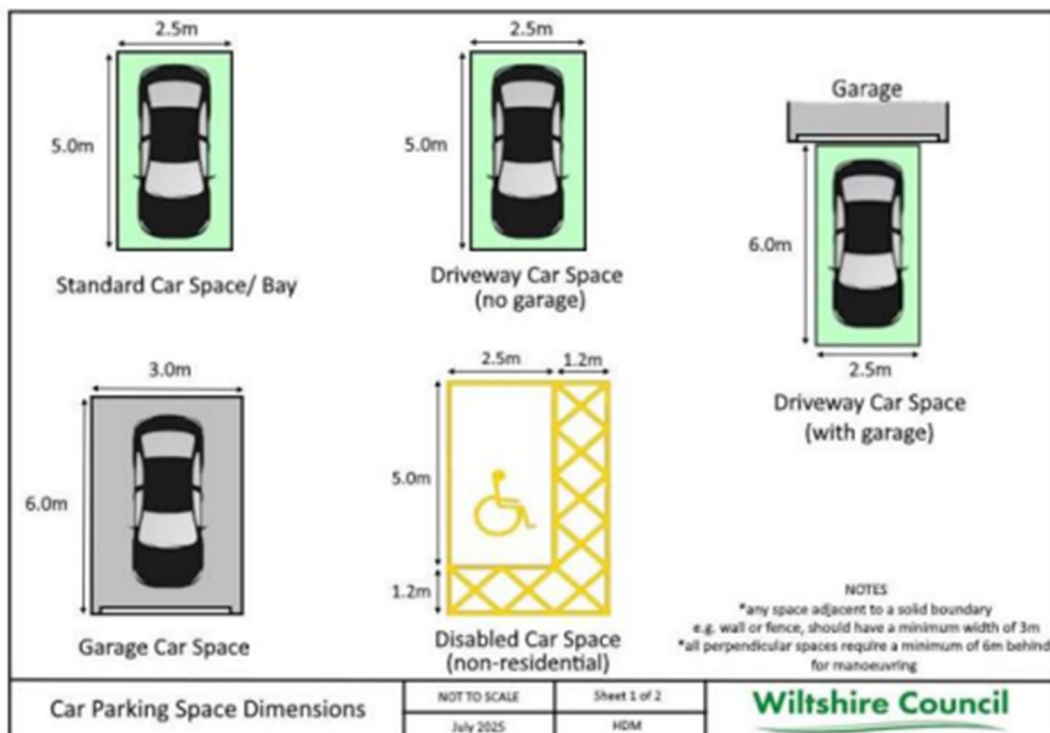
- 247-VISI Rev - Visibility Splay Plan

Assessed visibility splays from private / shared drives to suit a 20mph design speed being 2.4m x 17m (Manual for Streets). Further to this we have also included forward visibility splays and junction visibility splays from adoptable roads.

We note your comment regarding the TRO and 20mph signage.

Parking provided across the development meets the requirements for minimum parking standards and the quantum of visitor spaces provided is adequate. The emerging parking standards in the latest Local Transport Plan 4 (LTP4 emerging) states that there is an expectation that new residential building with associated parking must have access to electric vehicle charge points in accordance with guidance from "Infrastructure for the charging of electric vehicles – The Building Regulations 2010 Part S (HM Government 2021 edition).

Parking spaces are to provide for the following dimensions.



Therefore, across parking for Plots 81-84 a buffer of .5m between the parking space and the carriageway should be provided.

As it is noted, we have met the adopted requirements for parking standards and visitor spaces. Beyond this, any provision that aligns with the emerging parking standards should be viewed as over and above for the merits of this application. To that effect, we have accommodated the size of parking spaces sought throughout the development.

Previously our layout showed 2.4m x 4.8m car parking space dimensions (where there were no physical barriers). These have been amended to 2.5m x 5m. Where there is a physical barrier to the

side, the spaces have been amended to a minimum of 3m wide. All parking spaces that immediately front onto the carriageway (shared space where no footway is provided) have been moved so that there is at least 0.5m from the last space to the edge of carriageway. Where the parking space is adjacent to a footway, the 0.5m buffer is not required, as per the Wiltshire parking standards provided.

Drawings have been updated to accommodate comments. Please refer to drawing:

- 247-105_Rev A_Parking Allocation

There must be one EV charging point per dwelling to meet future needs.

A drawing to demonstrate this requirement has now been created. Please refer to drawing:

- 247-EVCLP Rev - EV Charger Location Plan

The original layout had been updated to include EV charger points in accordance with Part S of the building regulations.

The corner at Plots 31/32 should be designed to tighten the radius to the northeast corner in line with design principles for 20 mph zone for the development. As the swept path diagram here shows suitable tracking to the kerb line an overrun area can be included to produce the desired narrowing of the radius. This will discourage increased vehicle speeds around the corner.

Drawings have been updated to accommodate comments. Please refer to drawings:

- 247-VISI Rev - Visibility Splay Plan
- 247-131-4_Rev A_Swept Path Plans

Waste/Service Vehicle Swept Path

There are large carry distances for Plots 8,9,10,11,12,87,88,89,90. Either further swept paths for waste vehicles need to be demonstrated or collection points added for bin collections.

While swept path analysis provided through the development is adequate the question of access through Jenners Yard must be answered prior to any construction vehicle access.

To this end a swept path around the corner of Jenners Yard at the corner of 12-18. This can be included in the CMS that is conditional upon implementation of the outline permission granted through PL/2022/02452.

Drawings have been updated to accommodate comments. Please refer to drawings:

- 247-131-1_Rev A_Swept Path Plans
- 247-131-2_Rev A_Swept Path Plans
- 247-131-3_Rev A_Swept Path Plans
- 247-131-4_Rev A_Swept Path Plans
- 247-131-500_Rev A_Swept Path Plans

The vast majority of the plots front onto an adoptable road. Where parking courts are present and distances would typically be exceeded carrying refuse to the adoptable highway, a bin set down area has been provided. Where private roads are provided, these have been designed to accommodate a refuse vehicle, and tracking has been provided to suit.

Connectivity

There is provision for pedestrian/cycle connectivity through the site to West Mill Lane to the east and to the Sustrans route 45 to the west. Where adopted paths link to West Mill Lane and continue westbound into the development these should be a minimum 3m SUP and tarmac for the benefit of through connectivity for pedestrian and wheeling use. The connection from the development road to

Sustrans route 45 should also provide for a 3m wide SUP. All permissive paths to the north of the development and not indicated for adoption can be of softer material and will be maintained by the appointed management company.

A drawing to demonstrate this requirement has been submitted. Please refer to drawing:

- 247-PCLP Rev - Pedestrian Cycle Links Plan

The 2m wide pedestrian/ cycle links at the western and eastern boundaries have been widened to 3m.

Drainage

Drainage plans indicate that adoptable drainage gullies and connections are to be included in the scheme, however they are not shown on the drainage drawings.

A s38 plan (247-101 Rev - S38 Agreement Plan) indicating which roads will be adopted and remain private has been provided. This plan also shows the visibility splays.

A s104 plan (247-102 - S104 Layout) has also been provided showing all adoptable drainage inclusive of gullies and connections.

If the CMS and Travel Plan are to be provided with the REM submission, then I would welcome their inclusion in the suite of revisions. If not, then I will expect to see them in subsequent discharge of condition applications.

This information will be submitted following the Reserved Matters in order to discharge Condition 8 and Condition 11.

I understand that a number of these suggested revisions can be dealt with in the form of pre commencement conditions, however I would welcome revised plans indicating the additional information required to provide a full and robust response to the application for 140 dwellings.

This Reserved Matters application relates to PL/2022/02452 and its associated S106 Agreement dated 16 December 2024. The s106 secures 34 Affordable Rented & 14 First Homes & 8 Shared Ownership homes. I can confirm that the tenure mix appears acceptable from the indicative mix as per the s106 agreement.

Thank you for confirming the tenure mix is acceptable.

Parking Courts

Most of the affordable homes are served by parking courts, whereas many of the market homes benefit from in-curtilage parking beside the unit. For consistency and integration, we normally seek in-curtilage parking for affordable homes wherever possible. We would therefore encourage a redesign to bring parking forward and locate spaces adjacent to the homes they serve.

In order to create an interesting and varied development which responds to the site constraints whilst reflecting the local context, small pockets of terraced cottage style homes have been incorporated which share parking to the front of their property.

These honour those woven throughout Cricklade and the local area. It is therefore an appropriate use of space and reflects the more modest scaled dwellings in the local vernacular.

In addition, affordable homes are typically more modest in scale, therefore, to provide in-curtilage parking for all smaller properties would create an overly repetitive utilitarian street scape, which is not reflective of the local area or the high-quality development we wish to create.

This approach has not been applied to all affordable homes, as over 50% have been provided with in-curtilage parking.

Adjoining Tenures

Plots 35 and 36 appear to pair Affordable Rent and Shared Ownership in a semi-detached arrangement. To support effective marketing, we generally ask that different affordable tenures are not attached to one another. Ideally, each affordable tenure type should sit within its own small cluster to ensure clarity for residents, registered providers, and prospective purchasers.

In an ideal scenario all tenures would be distributed as you have noted, however, it is not always feasible to do so with the constraints present. We would sooner create a balanced and enjoyable place to live, than compromise it to contrive the scenario that addressed every preference possible. The layout remains clear, unambiguous and it is in our experience something Registered Providers would not and have not taken issue with, when similar examples have been encountered.

Parking provision for accessible units

Several M4(2) plots rely on parking within courts rather than on plot. It may be difficult for residents with mobility needs to use rear courts. These units would benefit from dedicated on-plot or immediately adjacent parking spaces.

The signed s106 requires homes to comply with 85% Nationally Described Space Standards (NDSS) Gross Internal Area (GIA) and only 3 homes to be built to M4(2) standards, with no provision for low or zero carbon homes.

By contrast we made the decision to far exceed these standards by proposing all affordable houses and ground floor maisonettes be built to M4(2) standard and that all dwellings meet Nationally Described Space Standards (NDSS) GIA.

In addition, all homes are either low carbon or zero carbon. As such, the proposed housing meet and exceed the Councils set standards.

If it is preferable to reduce the M4(2) portion of affordable homes of those which share parking areas, we can, although all properties have been designed to enable level access, irrespective of their location on site.

Environment Agency | Comment Number: WC-26-02-364573 | Dated: 27.02.2026

Environment Agency Position

In the absence of an adequate assessment of flood risk we object to this application and recommend that planning permission is refused.

Reason(s)

The submitted flood risk information does not comply with the requirements for site specific flood risk assessments, as set out in paragraphs 20 to 21 of the Flood Risk and Coastal Change Planning Practice Guidance and its site-specific flood risk assessment checklist. The submitted flood risk information does not therefore adequately assess whether the development will increase flood risk elsewhere. In particular, the submitted flood risk information fails to take the impacts of climate change into account.

- Flood risk mitigation measures to address flood risk for the lifetime of the development included in the design are inadequate because they will not make the development resilient to the flood levels for the Gloucestershire and the Vale Management Catchment 2080s central allowance of 26%.

Consequently, the development proposes inadequate Flood storage compensation.

Overcoming our objection

To overcome our objection, the applicant should submit revised flood risk information, or a Flood Risk Assessment (FRA) which addresses the points highlighted above. If this cannot be achieved, we are likely to maintain our objection. Please re-consult us when new flood risk information or a FRA is submitted. Specifically, the FRA will need to

- Demonstrate that any loss of floodplain storage within the 1% AEP plus an appropriate allowance for climate change can be directly compensated for to prevent an increase in flood risk elsewhere.

We welcome that the applicant has proposed all dwellings outside of Flood Zone 2 and 3.

From the 'Detailed HSA Landscape Plans (3 Pages)', we understand that ponds and a wetland area are being created to the north of the site. Some of the ponds proposed will be full all year round and landscaping works are proposed. It is unclear whether the proposed works will reduce floodplain storage, this needs to be assessed within the application.

The applicant may need to use modelling to assess floodplain storage calculations. In this location we hold a local flood model, the Thames (MRL to St Johns) 2014 model. Please contact our Customers and Engagement Team to obtain relevant flooding information for this site. This information is provided in the form of flood map products.

The product supplied depends on the type and size of the development being undertaken. Please contact them to request flood level and modelled extent information for the site. Your request can be sent by email to enquiriesTHM@environmentagency.gov.uk

Any increase in built footprint or raising of ground levels should be compensated up to the 1% AEP plus an appropriate allowance for climate change flood level. Level for level floodplain compensation is the preferred method of mitigation and should be considered within the FRA.

Level for level floodplain compensation is the matching of floodplain storage volumes lost with new floodplain storage volume gained through the reduction of ground levels.

We recommend that level for level floodplain storage calculations are provided in a table that sets out the change in volumes across the site using 100mm or 200mm slices (dependent on site specific considerations), stating the losses and gains for each slice.

It will need to be demonstrated that there would be no net loss in storage volume for any slice. The location of the changes in floodplain storage should also be clearly identified in a plan or drawing that demonstrates the scheme would be hydraulically connected for each slice.

Excavation of the proposed floodplain compensation scheme should be completed prior to the construction of development to ensure floodplain capacity is maintained.

Please note we are reliant on the accuracy and completeness of the reports in undertaking our review, and can take no responsibility for incorrect data or interpretation made by the authors.

Condition 14 (Detailed drainage scheme, Floor Risk Assessment (FRA) and Drainage Strategy) of the Outline planning application (PL/2022/02452) will be submitted following the determination of the Reserved Matters, which will address all relevant comments.

Note to Applicant – Outfall

The proposal involves the development of a drainage network, to direct, store and ecologically treat surface water run off prior to its discharge into the River Thames. The drainage infrastructure includes drainage channels, an attenuation basin, discharge pipe and outlet. These features should protect the receiving watercourse.

It is not clear from the submitted plans what the outfall feature, at the downstream end of the drainage network, constitutes in terms of infrastructure. However, in plans it is currently shown to discharge at a right angle to the River Thames.

We advise that the outfall be reorientated to discharge at an angle more in-keeping with the direction of flow of the receiving watercourse. The current proposal, which includes a right-angled outfall, could increase the risk of erosion within the culvert, create turbidity within the watercourse, and, most notably, if a formalized headwall and associated discharge pipe is incorporated into the design, cause blockages. To mitigate these risks, we recommend amending the plans so that the drained water is discharged at a much shallower angle.

The design has been amended to accommodate the reorientation of the outfall.

Note to LPA

If you are minded to approve the application contrary to our objection, we request you contact us prior to a decision being made to allow us to make further representations. If you have any queries regarding our response, please get in touch.

Public Bridleway CRIC34 crosses through the site. The route of this Bridleway appears to follow the route of the Wilts and Berks Canal tow path. I note the applicant would like to graze the fields and so will require gates on CRIC34. The bridle gate located at approximately SU 09117 94284 is positioned a little offline perhaps on the Southern bank of the old Canal when it should be on the Northern Bank. A new bridleway gate should be installed at Grid Ref SU 09136 94306 the gate should conform to the latest British Standards the gate will also need to be authorised by the Countryside Access officers and the approach to the gates should be constructed with a surface that is able to stand up to the amount of use this path is likely to get. The route of CRIC34 at the East end of the site near the horse stables will need to be discussed with the Countryside Access Officers as the Bridleway doesn't currently follow the correct route on the ground. Any new structures which are required to contain livestock will also need to be authorised at this location as well. I'm happy to meet the applicant to discuss this on site.

Clarity over the Public Right of Ways on site have been provided. Please refer to drawing '247-PCLP Rev - Pedestrian Cycle Links Plan'

Please find attached a submission on behalf of Cricklade Court Leet Charity in relation to Reserved Matters application PL/2026/00347 and its assessment under the Conservation of Habitats and Species Regulations 2017.

This submission identifies specific scientific, governance, and mitigation deliverability matters directly relevant to the Council's duty as competent authority under Regulation 63 of the Conservation of Habitats and Species Regulations 2017, and which must be addressed in order for the Council to lawfully conclude that adverse effects on the integrity of North Meadow SAC can be excluded beyond reasonable scientific doubt.

Please also find attached the supporting document entitled "Matters Requiring Explicit Consideration in Any Further Appropriate Assessment – North Meadow Special Area of Conservation" together with appendices (Appendices Part 2 and Part 3 sent as separate emails).

We would be grateful if you could confirm receipt and that these documents will be formally taken into account as part of the Council's Habitats Regulations Assessment process

Please see our response to Cricklade Court Leet Charity collective comments under WC-26-03-367404 comments, dated 25.02.2026.

Following discussion of the above application at the meeting of Cricklade Town Council on 9 March 2026, at which the Council resolved to object to the proposal, I write on behalf of Cricklade Court Leet Charity to request that Reserved Matters application PL/2026/00347 (Stones Farm, West Mill Lane, Cricklade) be called in for determination by Wiltshire Council's Strategic Planning Committee.

North Meadow forms part of the North Meadow and Clattinger Farm Special Area of Conservation (SAC), an internationally important floodplain meadow. As the competent authority under the

Conservation of Habitats and Species Regulations 2017, Wiltshire Council must be able to conclude beyond reasonable scientific doubt that the proposed development will not adversely affect the integrity of this European protected site.

The Reserved Matters application relies on the proposed Habitat Support Area (HSA) as mitigation intended to divert recreational pressure away from North Meadow SAC. However, a number of important matters relating to the design, function and long-term management of this mitigation remain unresolved.

In particular, the Reserved Matters plans appear to divide the Habitat Support Area into a relatively small recreational area of approximately 3 hectares and a larger biodiversity area of approximately 8.5 hectares with no public access. If this interpretation is correct, the majority of the HSA would not function as recreational mitigation. This may represent a significant change from the mitigation approach considered at the planning appeal and raises important questions regarding the adequacy and deliverability of the proposed mitigation for recreational pressure on North Meadow SAC. In addition, several key governance and deliverability issues remain unclear, including:

- the absence of a clearly defined and costed long-term management plan for the HSA
- lack of clarity regarding responsibility for management of the HSA
- the absence of a defined monitoring framework to demonstrate mitigation effectiveness
- the absence of clear arrangements for corrective action should the mitigation prove ineffective

The Planning Inspector's decision granted outline permission only, with detailed matters including scale, layout, appearance and landscaping (including strategic landscaping) reserved for later approval. The Habitat Support Area forms the principal mitigation relied upon to protect North Meadow SAC, and it is therefore important that the detailed design, function and long-term management of this mitigation are carefully examined at the Reserved Matters stage rather than deferred to later condition discharge.

Given the ecological importance of North Meadow SAC, the reliance on the HSA as mitigation, the sensitivity of the site, and the concerns raised locally, the application raises issues of significant public interest which merit determination by the Strategic Planning Committee rather than by delegated decision.

Cricklade Court Leet Charity recognises the need for housing development in the area and does not oppose development in principle. Our concern relates specifically to the proximity of this development to North Meadow SAC and whether the proposed mitigation can be relied upon to protect the site in the long term.

Given the ecological importance of North Meadow SAC and the concerns raised by Cricklade Town Council, we respectfully request that you consider exercising your call-in powers so that the application can be determined transparently by the Strategic Planning Committee.

Ethos Environmental Planning provided a response dated 16.03.2026. This was issued to Joe Richardson on 27.03.2026 following the escalated comments made by Cricklade Court Leet Charity. The content of Ethos response on our behalf has been copied below for convenience.

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.

Please note

Since the above response was provided, we have submitted the draft; Habitat Management and Maintenance Plan (HMMP for Condition 16) and; Ecological Management Plan (LEMP for Condition 17) for your consideration. Revised versions following comment and general drawing submission revisions will be issued shortly.

Planning Layout (sheet 1 of 2) 247-06-01:

The following plots would not adhere to WDG page 74, expectation 9.2.2 '*minimum garden areas for all houses should be equivalent to the footprint of the house*' and as set out in the 'Guidance on minimum standards table' page 75. These are rear gardens of plots 43, 44, 47, 48, 49, 50, 82, 90, 123, 124, 125, and 126.

Garden sizes have been amended, inclusive of plots 123-126, although these properties are bungalows which from our experience typically do not warrant extensive gardens, and often deter those wishing to purchase them, if provided.

Plot 45 and plots 87 to 91 inclusive as 2 storey houses with north facing rear gardens would not adhere to WDG expectation 9.2.2 that for a typical 2 storey house this should be a minimum of 12m long.

WDG2024 states 'In general, a north facing garden for a typical 2 storey house should be minimum of 12m long. Garden sizes for these properties are now equal to or greater than the footprint of the property. Increasing these plots to 12m creates disproportionately large gardens and compromises the layout for limited on plot benefit.

The rear garden of plot 108 and of plot 123 would not meet WDG expectation 9.2.4 that these should create usable garden shapes avoiding irregular pointed corners and narrow strips.

Gardens have been amended to improve functionality, as requested.

The parking bay to plot 48 is across the face of house 47. This would not adhere to WDG page 77 expectation 9.3.7 '*any parking close to a habitable window should be allocated to the resident of that home, in order to minimise noise disturbance*'. 13.03.2026 Urban Design consultation response - PL/2026/00347 Page 2 of 2

Boundary & Enclosure Key Plan 247-09:

Numerous brick boundary walls to rear gardens facing the street and parking closes (and public open space) are shown. These adjoin and continue from the rc stone and render facades facing the street. Brick is not a characteristic feature of the town and local area whereas stone is an intrinsic feature, and as conveyed in the Design & Access Statement. It would be reasonable to expect these boundaries to also be in the rc stone in order to adhere to WDG page 76 expectation 9.3.1.

Boundary treatments can be amended. Our preferred specification would be our batten and board detail, which is mounted to 150mm solid timber posts, and is an extremely robust detail, which surpasses Closeboard fencing and equals masonry wall when retaining is not required. It is far more environmentally conscious, aesthetically pleasing and can readily be recycled and repaired if required.

The rear garden boundary of dwellings 9/10 and 11 facing onto the close and parking bays and similarly the rear garden boundary of dwellings 84, 85/86, 99, 100 and 101 facing onto the close and car bays as timber fencing would not adhere to WDG page 77 expectation 9.3.5 that these should use robust masonry as opposed to timber fencing, and that this should be in rc stone and not brick to adhere to WDG expectation 9.3.1.

Please see our suggestion as above, which we trust you can agree with.

This site has been promoted for development for many years. Outline permission was granted at appeal on 23rd January 2025 for up to 140 dwellings under WC planning reference is 2022/02452. Cricklade Town Council had objected to the application and had spoken against it at the appeal hearing.

The Outline application gave consent "... for the erection of up to 140 dwellings, a habitat support area and associated landscaping and works. Access not reserved.

"This further application is to cover all matters not dealt with at the Outline stage."

Kindly clarify what document within the Reserved Matters application the above sentence has been copied from, as the key documents (Planning Statement and Design Statement) do not contain such wording.

The Reserved Matters is specifically for conditions 3 and 7 and includes details of the appearance, landscaping, layout and scale. In addition, the application also sought the acknowledged compliance with conditions 4 and 12.

It is the desire of CTC to see that the development is the best it can be for the new residents and the current residents living in that vicinity and so a meeting with Newland Homes took place on 24th February 2025 to discuss matters of concern to CTC. Notes of the meeting were subsequently shared with Newland Homes for their attention.

2. Storm Water Drainage

The proposed scheme is essentially the same as that presented in the Outline application. Rainwater from roofs, roads and pavements will drain (marked in blue on the plan below) to an attenuation pond. From there it will be released into the Thames at a rate not exceeding 11 litres per second which is below the current greenfield run off rate.

The WC Drainage Officer supports the application subject to a number of conditions including:

a) The discharge rate must not exceed 9.4 litres per second (which presumably means that the attenuation pond will need to have a greater capacity)
As noted in the Drainage comments response above, there is spare capacity within the existing design to achieve 9.4 l/s without changing the design or size of storage on site. The design will therefore remain the same whilst achieving the required rates.

b) An Environmental Permit is required from the Environment Agency before discharging into the Thames.

However, the submission of 26th February 2026 from the Environment Agency objects to the application because of the absence of an adequate assessment of flood risk. The submitted flood risk information does not adequately assess whether the development will increase flood risk elsewhere. To overcome this, a Flood Risk Assessment is required that addresses this point.

We agree with this stance, the use of the attenuation pond will hold back the rate of flow of water into the Thames but, over time, the actual volume of water discharged will be greater thereby creating potential problems downstream.

Condition 14 (Detailed drainage scheme, Flood Risk Assessment (FRA) and Drainage Strategy)

of the Outline planning application (PL/2022/02452) will be submitted following the determination of the Reserved Matters, which will address all relevant comments.

3 Foul Water Drainage

The plans submitted show that foul water will drain (shown in red on the plan below) to a pumping station situated on the eastern boundary of the site. From there it will be pumped to the mains sewer on the Jenners Yard site.

The capacity constraints of the Cricklade Sewage Treatment Works (STW) are well known to residents. In 2024 (the last year for which figures are available) the STW discharged untreated effluent into the Thames on 107 separate occasions totalling 1,378 hours which is the equivalent of over a full day once a week.

Thames Water are obviously aware of the problems and their website says:

“Cricklade STW is being upgraded at a cost of more than £7 million. This project will provide a major increase in treatment capacity, from 26 to 30 litres per second, reducing the need for untreated discharges in wet weather as well as including an increase in storm tank capacity. We expect the project to complete in autumn 2026. We expect this location to meet all government targets for storm overflows by 2045 - 2050.” extract from Thames Water website 19th February 2026

Whilst this is welcome news, it is not clear that the 15.4% increase in capacity will be sufficient to cope with the current constraints, let alone the additional throughput from the 140 dwellings of this application. A condition should be placed requiring TW to confirm in writing that, once upgraded, the Cricklade STW can deal with the expected volumes

Condition 22 (Foul Water Drainage) of the Outline planning application (PL/2022/02452) will be submitted following the determination of the Reserved Matters, which will address all relevant comments.

5 Construction Materials and Street Scene

The street scene plans and graphics above show that the applicant is proposing to use a mixture of materials with dwellings built of brick, stone and render for walls. Differing colours for roofs are shown and a wide variety of building designs. The housing consultation carried out as part of the current Cricklade Neighbourhood Plan showed that residents were of the view that Stockham Close – which has a mixture of building materials - was the most highly regarded of the recent housing developments in the town with 61 ‘likes’ compared to 40 for the next.

The most noticeable feature is a preponderance of red roofs because those described as ‘plain’ are also red, albeit muted, which could make the solar panels stand out even more. In the Design Statement the applicant displays 18 photographs of housing scenes in the town and the only ones that are red are on the adjoining Jenner Close. In view of the visual impact of the development towards North Meadow and the Thames Path National Trail it is suggested that more traditional grey slate approach be used.

Properties photographed provide an indication of a range of architectural styles found locally, they do not specify the only materials found locally. One need only use Google Earth to see the vast majority of roof tiles within Cricklade are not grey, which are primarily reserved to the historic properties. Even the favoured local development noted above only has a small proportion of grey roof tiles.

Notwithstanding the above, grey roof tiles can be found on the following number of dwellings and garages:

Total properties 75 of 140

Total Single Garages 15 of 43

Total Shared Garages 2 (4) of 5 (10)

Total Double Garages 17 of 26

As can be seen, over 50% of the proposed development is specified with grey roof tiles to reflect Cricklade's history. Whilst the balance is profiled or plain tiles to provide greater variety, avoid repetition and help blend with the local architectural language and reflect the materials found.

We note that reference is made to the use of gravel for certain footpaths, this is not appropriate where bins and bikes have to be moved around. Further, all parking areas must be permeable block or tarmac to reduce maintenance requirements and ensure longevity.

Bound gravel footpaths are only suggested in the public open spaces. Private dwellings typically have paving stones, block paving or asphalt as a finished surface.

6 Parking and Garages

The above plan shows the private parking spaces marked in blue and the visitor parking spaces in red WC parking standards require 0.2 visitor spaces per dwelling which equates to a need for 28 visitor spaces. The plan shows 10 'on road' marked spaces and 19 in layby parking bays. The on road spaces will obviously disrupt traffic flows and should be replaced by additional layby spaces.

Layby parking spaces and on road unallocated parking spaces in combination is a proven and accepted approach to accommodate site visitors. The site has been fully tracked with a selection of vehicles and there are no traffic conflicts with the design as proposed.

Wiltshire Council parking standards require a garage to have internal dimensions of 6m x 3m minimum to qualify as a parking space. However sufficient parking spaces are provided without the need to include the garages.

The WC parking standards requirement is 1 bed = 1 space, 2 or 3 bed = 2 spaces and 4 or more bed = 3 spaces. This equates to a requirement for 310 allocated parking spaces. The plans show that 337 will be provided with the main reason for the excess being that most of the 4/5 bed properties are provided with 4 spaces in front of a double garage.

We note that the parking provision for the Affordable Housing is mainly in the form of parking courts as opposed to the 'within curtilage' provision for the market housing. We would echo the comments of the WC Project and Enabling Officer:

"For consistency and integration, we normally seek in-curtilage parking for affordable homes wherever possible. We would therefore encourage a redesign to bring parking forward and locate spaces adjacent to the homes they serve."

This will be especially helpful for those units providing accommodation for the less mobile.

Please refer to our Housing Enabling Officer response.

7 Site Layout and Connectivity

The WC Design Code (para 9.2.2) requires that "minimum garden areas for all houses should be equivalent to the footprint of the house or 50sqm whichever is greater."

For certain plots this condition appears not to have been met, for example on plots 41 – 44 and 47

– 50 as can be seen below. These gardens should be made bigger.

[Please refer to our Urban Design response.](#)

The Cricklade Neighbourhood Plan (policy TT2) is very supportive of the concept of connectivity and active travel. We are pleased to see that the road layout has been designed to allow a pedestrian and cycle link to be created to Reeds in due course – subject to land ownership issues being resolved and public consultation.

The pedestrian and cycle links to the old railway line in the west and West Mill Lane in the east are vital elements of this development. We agree with the requirements of the WC Highways Engineer that these should be a minimum 3 metres wide for shared use to the point where they meet the development road. All the footpaths in the residential area, including the linking paths to the old railway line, West Mill Lane and the HSA recreation area shall be tarmac. Street lighting should be provided on the West Mill link to enable safe access to and from the site at all times.

[Please refer to our Highway Officer response.](#)

8 Affordable Housing

Total Affordable Housing = 56 which meets the agreed WC policy requirement of 40%.

WC Core Policy 43 requires “Affordable housing units will be dispersed throughout a development and designed to a high quality, so as to be indistinguishable from other development. In determining the level of integration that can be achieved, consideration will be given to the practicalities of management and maintenance associated with the proposal whilst still ensuring affordability, particularly in developments of flats.”

It is not clear that the proposed layout meets these requirements - although we note the somewhat contradictory comments of the WC Projects and Enabling Officer that “Plots 35 and 36 appear to pair Affordable Rent and Shared Ownership in a semi-detached arrangement. To support effective marketing, we generally ask that different affordable tenures are not attached to one another. Ideally, each affordable tenure type should sit within its own small cluster to ensure clarity for residents, registered providers, and prospective purchasers.”

[Please refer to our Housing Enabling Officer response.](#)

We are the opinion that the location of the affordable houses is suitable.

9 Local Equipped Area for Play (LEAP) As shown in the outline application, the LEAP is located at the far western end of the site near the old railway line (see note 11 below)

It is described as a ‘Natural Play Trail’ to distinguish it from the type of play equipment more usually seen.

WC standards suggest that LEAP facilities should be aimed at 4 to 8 year old children. It is not clear that this would meet the needs of this age range.

We have previously commented that the LEAP would be better located near the entrance to the development from Jenners Yard where it would be more likely to be used - especially by younger children coming home from school. The submitted plans show that children have to walk the whole length of the estate to get to the LEAP area.

[During previous meetings with Cricklade Town Council we explained why the LEAP is located within the public open space to the west. Our proposals focuses on natural play and the ability to extend](#)

the trail experience into the public open space beyond, this creates a more enjoyable and safer environment for children to play, away from public highways.

All Public Open Spaces on site are activated by natural surveillance due to the position and orientation of the homes that addresses them, the LEAP location is no different, enabling all spaces to be safe environments to enjoy.

The LEAP proposed is in the form of natural play as they are engaging, sustainable, environmentally conscious and more aesthetically pleasing than traditional LEAPs that are enclosed with railing/fencing. In addition, they do not tend to suffer from antisocial behaviour as they are not consolidated pieces of equipment within a confined area for people to congregate around.

The short distance required to walk to reach the location proposed would not discourage people keen to be within nature and play. The balance of Public Open spaces evenly distributed throughout the layout do not preclude people from actively playing within them either, should they so wish.

10 Habitat Support Area (HSA)

The HSA has two elements – Recreational (yellow) and Biodiversity (green) CRIC34 Bridleway shown in blue

The Recreational HSA will be neutral grassland with mown footpaths to aid accessibility and with woodland edge planting to the east and west boundaries – shown in the darker green. The attenuation pond is designed to have water in at all times. We are of the opinion that the paths should be hoggins to ensure year round use otherwise they will just become muddy in wet conditions. The Biodiversity HSA will be sown with 'Cricklade' wildflower meadow mix and have a wetland area at the northern tip. It is crossed by the existing bridlepath CRIC34 which follows the route of the old canal and is shown in blue on the plan.

The primary paths within the recreational portion of the HSA are self-bound gravel, not mown grass. Mown grass routes have however since been incorporated to provide greater pedestrian opportunities within the HSA Meadow, following the LPA request. These mown routes can be found leading off from the self-bound gravel route.

The section 106 agreement (signed by WC and the landowner at the time of the appeal) includes Plan 3 which states "Perimeter path delineated by mowing" in the HSA Biodiversity area and two pedestrian access points from that area to the old railway line.

We note with great concern that there has been a significant change in the proposed arrangements for the Biodiversity HSA and the features mentioned in the above paragraph have been deleted. CTC has objected to development of this Stones Farm site, one of the main reasons being its proximity to North Meadow which, as is well known, is a site of international importance - being a Special Area of Conservation (SAC), a National Nature Reserve (NNR) and a Site of Special Scientific Interest (SSSI).

The recreational pressure is already great on North Meadow and building more houses close by will obviously add to that. This fact has long been recognised and the HSA has been devised as a means of not only not increasing but to actually reduce those recreational pressures. The objective of the HSA is to discourage residents from accessing North Meadow by providing an alternative space to walk, especially for dog walkers. By attracting existing residents from nearby housing developments to the HSA it is hoped that the numbers going into North Meadow will reduce.

Unfortunately the plans submitted with this Reserved Matters application show that direct access from the Recreation HSA (yellow) to the Biodiversity HSA (green) will not be possible, the linking

paths shown on earlier plans have all been removed. The plan above showing the new hedge to be planted to demarcate the boundary between the Recreation and Biodiversity HSA areas to the north east explicitly states that “no access from HSA to recreation area.” Whilst access to the bridleway CRIC34 is possible from West Mill Lane, the path beside the old canal is not level, very muddy in wet weather and goes through the yard at West Mill Farm (see schedule of photos below). These changes mean that the chance of this development reducing recreational pressure on North Meadow will disappear and, further, it means that the pressure is guaranteed to increase. The new footpath to be created in the Recreational HSA is far too short to provide an attractive option for dog walkers.

The plans for the HSA must be revised to:

- 1) Reinstate the linking paths from the Recreational HSA north east and north west to the Biodiversity HSA that were shown in previous versions of the plans,
- 2) Create a mown path around the whole of the Biodiversity HSA which will produce a circular walk of 1.5km including of 400m of riverbank,
- 3) Convert at least one of the two five-bar gates that open on to the old railway line to allow pedestrian & cycle access thereby enabling more circular walks to be created. (This is in addition to the access point from the residential area that will be created).

Cricklade Court Leet own a part of North Meadow and have been responsible for managing the grazing for many years. They have raised a number of very important matters regarding the impact of this housing development on the Meadow. CTC is supportive of their representations.

[Please refer to our Cricklade Court Leet Charity response.](#)

The Plans and a 10 Year Maintenance Programme have been submitted covering the residential area. They show a schedule of works for each of the first ten years of the development as the plants and new hedges become established. The Maintenance Programme is detailed and encompasses matters such as frequency of grass cutting, bin emptying, play equipment inspection etc. The first 10 years schedules are described as ‘establishment operations’ and after year 10 there is an ‘annual schedule’ of jobs to be carried out on an ongoing basis. All these works will be carried out by private contractors and funded by a management fee charged on the residents.

Bins are shown on the plan where the paths leave the residential area to go onto the recreational area but they are also required at the entrance to the estate from Jenners Yard and at the pedestrian/cycle link to West Mill Lane.

There only appears to be one bench proposed – by the play area at the western end by the old railway line. This is insufficient, benches should also be provided on the other green spaces. We would like to see the option explored for residents to operate the management company. There should be some element of control to keep the costs down for the residents.

[Additional public open space bins have been provided as requested, however, much like other countries. People should be educated and encouraged to take litter home with them, rather than ending their responsibility at a publicly located bin for others to empty.](#)

[Additional benches have been incorporated into the design at key locations.](#)

12 Management Regime – Habitat Support Areas (HSA's)

Management Plans for the two HSA's by Ethos Environmental Planning were filed with the outline planning application. We assume that the establishment and management will be carried out by a company set up by the developer as we understand that Natural England do not have the resources to do so.

We previously requested that the number of 2 bed Open Market houses be increased and it has been, from 4 to 9. However, we would still prefer to see a greater number of small open market dwellings (1/2 bed) with less emphasis on the larger 4/5 bed dwellings.

14 Other Matters

(i) Road Access via Jenners Yard.

Although this was considered as part of the outline application (granted on appeal January 2025) it remains the case that the residents of Jenners Yard will be confronted with much more traffic past their houses. Particular problems have been identified at the 90o right-hand bend where parked cars can make manoeuvring difficult (see photo below). Double yellow lines at this point should be considered and other options such as road widening.

The construction period will be especially difficult with HGV's bringing deliveries of materials and will require careful control in the interests of road safety.

We note the intention to designate the whole development site (including Jenners Yard) as a 20mph Zone from the junction with West Mill Lane, something which we welcome.

The route through Jenners Yard will be the main pedestrian entrance and exit from the development. A Zebra crossing on West Mill Lane will be key to ensuring road safety for new and existing residents, especially young children on their way to school.

(ii) Allotments.

The Cricklade Neighbourhood Plan (policy LAF2) requires allotment space to be provided and this is not shown on the plans. The CNP does allow the allotments to be provided offsite and CTC does own land which might be suitable.

Wiltshire Council

Wiltshire Council Ecology | Comment Number: WC-26-05-376532 | Dated: 28.05.2026

I have reviewed the application and supporting documents against OS Maps and aerial photography of the site and surrounding area, together with GIS layers of statutory and non-statutory sites and existing records of protected species.

The following submitted documentation was reviewed to inform this response:

- 10 Year Landscape Maintenance Programme. January 2026. Peter Quinn Associates
- Detailed Landscape Proposals 26/591/01. January 2026. Peter Quinn Associates
- Planning Layout Sheet 2 247-06-02. January 2026. Newland Homes
- Planning Layout Sheet 1 247-06-01. January 2026. Newland Homes
- Habitat Management and Monitoring Plan. April 2026. Ethos and Newland Homes
- Landscape and Ecological Management Plan. March 2026. Ethos

We note the proposal for reserved matters in relation to application PL/2022/02452 determined at Appeal APP/Y3940/W/24/3351265 December 2024.

North Meadows and Clattinger Farm Special Area of Conservation SAC

The development lies within the inner zone of influence (0-4.2km) for the North Meadow National Nature Reserve (NNR)/Site of Special Scientific Interest (SSSI) component of North Meadow and Clattinger Farm SAC, notified as an exceptional example of lowland meadow with a very high

proportion of the surviving UK population of snake's head fritillary. The development is screened into Appropriate Assessment under the Habitat Regulations 2017 (as amended) on account of its potential to cause adverse effects through increased recreational pressure, which may occur alone or in-combination with other plans and projects.

As noted in our email of the 23rd April 2026 and our written response 18th May 2026, there appear to be discrepancies between the Habitats and Landscape Strategy (1379-04-P13. January 2019. David Wilson Partnership) agreed at Appeal and the more recently submitted Planning Layout Sheet 2 (247-06-02. January 2026. Newland Homes) submitted in support of the Reserved Matters application. Appropriate Assessment (AA) under Section 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) must be carried out by the relevant Competent Authority (the LPA) to determine the potential significant effects and the suitability of any measures proposed to avoid or mitigate those effects. Insufficient information has so far been submitted to enable the AA to be undertaken, which must be completed and the conclusion agreed with Natural England prior to the Reserved Matters being determined.

As requested in our email, additional information in relation to the proposed Habitat Suitability Area (HSA) must be submitted in accordance with conditions 16 and 17 of the Appeal Decision in order to support an Appropriate Assessment.

We welcome the submission of the LEMP and HMMP to support the discharge of these conditions, however clarification is sought as outlined below, in order for this information to support the favourable conclusion of the AA.

As outlined previously the Planning Layout Sheets have been modified to those agreed at Appeal and will require amendment prior to favourable completion of the AA. It is noted in section 3.2.2 of the LEMP that the northwest and east fields will be prioritised for biodiversity and not public open space. The updated landscape plans reflect this with the removal of footpaths from these northern parcels. However, the Appeal Decision states that the HSA should be a 'functional and accessible greenspace', this must be reflected both within the management plans and on the Ecological Parameters Plan (Planning Layout Sheet) as detailed in condition 16.

The HSA Meadow has been updated to accommodate a greater number of mown footpaths. Interpretation boards have been included at key locations, along with waste bins, benches and gates to enable greater control and flexibility over the HSA Meadow management scheme.

Further details of which can be found within the revised HSA Meadow landscaping drawings and the Habitat Management and Maintenance Plan (HMMP for Condition 16) and; Ecological Management Plan (LEMP for Condition 17).

Please note

We trust given information to address conditions 16 and 17 has been provided at request, in advance of a typical Discharge of Condition application, when they would normally be submitted, that these conditions also form part of the Reserved Matters. Rather than requiring the need to re-discharge the noted conditions separately again, with identical information.

It is noted that although the HSA is consistent with actions of the SIP by reducing the fragmentation of semi natural grasslands in the area surrounding the SAC and provides distinct management plans for the biodiversity area and recreational area, reducing public access in the north eastern section on

the Planning Layout Sheet to only the public right of way does not meet the criteria of the HSA as agreed at Appeal. This will require amendment prior to a favourable conclusion of the AA.

The LEMP suggests that access will be in the form of informal paths of mown grass and may not always be fixed in nature, although this is supported and will align with the biodiverse nature of the northeastern parcel aims, the general locations of these paths should be included on plans with the understanding that the actual routes may alter over time but that general access will be provided in these areas in perpetuity. In its current form the Planning Layout Sheets with the single right of way path indicated do not support the proposals agreed at Appeal.

Initial locations have been mapped. Further annotation notes that the routes will vary between seasons to prevent compaction and excessive wear.

Additionally, the HSA is to be provided in perpetuity for the lifetime of the development, at present the HMMP and LEMP refer to 30 year management plans which does not reflect the level of management required to support the HSA and should be amended to read in perpetuity or 80 years for clarity.

Details have been updated to reflect this.

Additional management prescriptions including fencing off of ponds and the 10m buffer zone along the river corridor should be included within the Landscape Masterplan as in accordance with condition 16 and the Ecological Parameters Plan.

Attenuation ponds are typically kept open wherever possible as they are far more aesthetically pleasing in this format and fencing them away generally creates an urbanised feel and greater degree of safety issues, especially when access is limited. Something we are keen to avoid in such a sensitive location.

In respect of the ecological ponds within the HSA Meadow. The ground in this area is heavily saturated and inaccessible for large portions of the year, irrespective of the suggested ecological ponds proposed, fencing would therefore fail and create an eyesore. We therefore respectfully request to keep the spaces as natural as possible.

The 10m buffer zone along the River Thames has been accommodated.

In accordance with Appendix 4 of the North Meadow and Clattinger Farm interim Recreation Mitigation Strategy 2023-2028, other measures for management of the public open spaces should include litter bins at key points to minimise dog fouling and also signage to direct people around the site. This would be especially important in the northeastern section which will be managed to prioritise biodiversity. These details should also be included within the HMMP and the locations detailed on the Landscape Masterplan.

As noted above, additional bin, signage and benches have been incorporated.

Protected and Notable Species

As identified within the Ecological Impact Assessment (January 2022. Ethos) the application lies adjacent to the River Thames which supports otter, water vole and beaver. These protected species will be buffered from the development by the HSA, however the original Landscape drawings indicate a 10m buffer between the river corridor and development within the HSA which is not

indicated on the current Landscape Plans. This should also be addressed within the ecological parameters plan as outlined within condition 16 of the Appeal Decision.

As noted above.

Biodiversity Net Gain

From 12 February 2024 Biodiversity Net Gain (BNG) became mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). Based on the information available the biodiversity gain planning condition is not considered to apply to this application as the application for planning permission was made before 12 February 2024.

Landscape | Comment Number: WC-26-06-378449 | Dated: 15.06.2026

Background

This Reserved matters application, seeks approval for the detailed appearance, layout, scale and landscaping for an outline planning application for up to 140 dwellings, at the above referenced site, which was granted outline planning permission subject to conditions, following a successful appeal made by the applicant, under planning application reference PL/2022/02452 and PINs Appeal Ref: APP/Y3940/W/24/3351265.

Comments

The detailed scale, appearance and landscaping measures included within the submitted planning layout and supporting details generally accord with the illustrative outline Key Plans and mitigation measures identified within the Landscape and Visual Impact Assessment (LVIA) and considered under outline application PL/2022/02452 in so far as these relate to Landscape and public visual amenity matters.

The detailed soft landscaping drawings are generally considered acceptable and deliver appropriate forms of tree planting and landscaping to provide amenity and mitigation for the proposed development, although the boundary hedgerow demarking the northern edge of the housing area should in my opinion, incorporate some additional planting of small species native hedgerow trees, (into new proposed mixed native hedgerow sections and into the existing new hawthorn hedgerow section) such as hawthorn or small fruiting crab apple 'standards' to contribute to the layered visual filtering functions and interest to the built development edge.

They should be introduced in locations where this will not block key views from streets and green spaces as identified within GI and landscape strategies for this development, and to assist wider countryside transition and integration. These could help denote entrances to footway connections to POS areas through this hedgerow and would be considered particularly appropriate introduced fronting plots 70 -75 and 94-96 and 124-128 where there is a notable absence of proposed street trees in corresponding street lengths.

These additionally requested trees should be informally spaced; I suggest that somewhere in the region of 12-15 number total additional trees introduced into this hedge line (existing and proposed sections) would be suitable to achieve this. It is important that key designed views to focal features and strong visual connections between development and the countryside and POS to the north are also maintained to support positive place making connections.

Additional trees have been incorporated as requested.

The comments of this council's urban designer dated 13.03.2026 in relation to unacceptably small garden sizes for some plots and the inappropriate use of brick and timber as garden wall enclosures where these front onto POS areas and public realm, illustrated by the Boundary Enclosure key plan, instead of more character supporting stone/re-con stone are valid points in relation to securing appropriate design appearance for the development, and in terms of supporting wider landscape character at this site location.

Garden sizes have been amended in accordance with the Urban Design Officer comments and boundary treatments have been responded to accordingly.

There is no landscape objection to the LPA approving the currently presented scheme in terms of compliance with Development Plan policies; Wiltshire Core Strategy - CP51: Landscape; CP52: Green Infrastructure; and (saved) policies of the North Wiltshire District Local Plan - NE14: Trees, site features and control of new development).

However, there is some conflict with WCS, CP57: High Quality Design, and the expectations included in the Wiltshire Design Guide, as identified by this council's urban design officer.