

Appendix 1 – Outstanding HRA Issues Schedule

PL/2026/00347 – Stones Farm Reserved Matters
Cricklade Court Leet Charity
6 August 2026

Background

- The HSA principle was accepted at outline stage, but the detailed design, management and effectiveness arrangements were left to subsequent stages. The present AA must therefore assess the final mitigation package actually proposed at Reserved Matters.
- Conditions 16 and 17 and the Section 106 provide part of the delivery framework, but do not themselves determine the Habitats Regulations integrity test. Matters essential to demonstrating mitigation effectiveness must be sufficiently resolved before Wiltshire Council reaches a favourable AA conclusion, even where formal approval of some implementation detail may occur later.

Ref	Required assurance	Current applicant position	Conflict or missing evidence	Why it matters	Required resolution	Key evidence / sources	Status
A. Mitigation design and effectiveness							
HRA-1	Demonstrate a coherent mitigation strategy explaining how the HSA, together with the other secured measures, will avoid an adverse effect on the integrity of North Meadow SAC arising from additional recreational pressure.	The HMMP, LEMP and revised drawings describe habitat management and elements of recreational provision, but do not clearly articulate how the complete mitigation package will divert sufficient recreational use from North Meadow.	HMMP states "The primary objective of the site is to enhance and manage habitats to support biodiversity and contribute to the conservation objectives of the SAC" LEMP states "The vision for the site is "To create an area focused on biodiversity enhancement with a separate area set aside for informal recreation, through maintaining and enhancing the existing landscape and ecological features in particular the riverine habitats, grassland, scrub and hedgerows" Neither statement clearly explains how the proposed HSA will address the accepted recreational-pressure pathway by diverting sufficient recreational use from North Meadow.	The Council cannot reach a robust conclusion on mitigation effectiveness unless the complete mitigation proposition is identified and assessed.	Explain how the HSA and associated mitigation will divert sufficient recreational use away from North Meadow to achieve that outcome. Identify the respective functions of the HSA and the strategic SAMM measures within the mitigation package, and explain how the package as a whole achieves the necessary recreational-pressure mitigation.	HMMP page 8 LEMP page 11 para 3.1.4	Partially demonstrated / unresolved
HRA-2	One coherent, final and enforceable HSA scheme	HMMP, LEMP and associated revised drawings are inconsistent.	Access mismatch means the HMMP does not currently capture the more extensive path network, dedicated recreational zone, or active visitor-management measures set out in the LEMP. This could affect both the delivery of SAC mitigation (deflection of recreational pressure) and the habitat-condition targets for the biodiversity grassland restoration.	Council cannot assess or enforce an uncertain scheme	Submit a coordinated final set of HSA drawings and management documents consistent with the operative Section 106. Where the final mitigation scheme requires obligations different from those presently secured, identify and complete any necessary legal variation before the Council relies upon the scheme in its AA. The final AA should assess that same coordinated scheme.	HMMP page 2 LEMP page 22 para 4.8 HSA Landscape Plan	Partially demonstrated / unresolved
HRA-3	Functional and attractive recreational provision and year-round usability	The revised paths potentially restore the recreational function of the Biodiversity HSA, but the documents do not demonstrate its attractiveness, explain how the paths will be used, or establish their year-round availability.	Recreational Attractiveness • How will the HSA provide a sufficiently attractive, convenient and usable alternative to divert routine recreational visits that might otherwise be made to North Meadow? • Will prioritising the Biodiversity HSA for biodiversity enhancement reduce its effectiveness for diverting recreational pressure from North Meadow? • Will dogs need to be on a lead? • What will be the primary dog walking route and what distance does that provide? The LEMP states that the HSA will be functional before first occupation. What criteria define "functional" for its recreational-mitigation purpose, and what infrastructure and recreational provision must therefore be complete and available before the first dwelling is occupied? Year-round functionality • How will grazing periods affect access, dog walking, user perception and year-round availability? • Will the mown paths be accessible year-round? • If the path locations are changed periodically will this create confusion or will they have temporary marker posts? • Repeated relocation of mown paths may spread trampling and compaction across a wider area; how will this risk be monitored and managed?	A favourable Appropriate Assessment cannot be completed without understanding how the recreational pressure mitigation will work.	A clear rationale is required demonstrating that the HSA will provide a sufficiently attractive, convenient and usable alternative to divert the level of routine recreational use necessary for the mitigation to be effective.	HSA Landscape Plan LEMP pages 13, 17 and 22 paras 3.2.2, 4.4 and 4.8 Wiltshire Council Ecology Consultation Response, Bellway application PL/2025/07863, updated 4 August 2026. Wiltshire Council Appropriate Assessment, Bellway application PL/2025/07863, 5 August 2026	Not demonstrated
HRA-4	Critical HRA Assumption Evidence that the HSA will reduce visits to North Meadow	Evidence and rationale for how the HSA will reduce visits to North Meadow has not been provided.	The proposal would add 140 dwellings to an existing baseline of approximately 581 dwellings within 500 m of North Meadow, an increase of approximately 24% in the number of dwellings within this immediate walking-distance area. • What proportion of new residents are expected to use the HSA? • What level of diversion is necessary for the mitigation to succeed? • Why will the HSA be sufficiently attractive, convenient and functional to divert the necessary proportion of routine dog-walking visits from North Meadow? • Will the proposed paths be sufficiently attractive for routine dog walking? • What constitutes successful mitigation, and against what baseline will success be measured? Given that the nearest dwellings would be approximately 280 m walking distance from the West Mill entrance to North Meadow, and North Meadow's own evidence demonstrates frequent local recreational use, what evidence demonstrates that the HSA will change that behaviour sufficiently to make the mitigation effective?	North Meadow's own visitor-survey evidence demonstrates that recreational use is strongly influenced by proximity, with frequent walking and dog-walking trips originating from the surrounding residential area. Evidence from comparable European sites, including Natural England's advice for Chilterns Beechwoods SAC, shows that development within easy walking distance can present particular difficulties for alternative-greenspace mitigation because routine local visits may be difficult to divert. The effectiveness of the Newland HSA therefore requires an application-specific behavioural justification rather than being assumed from its provision alone. Failure to achieve the required recreational diversion could affect North Meadow not only through increased trampling and compaction, but also through increased interference with the traditional grazing regime upon which maintenance of the qualifying floodplain meadow depends. The AA should therefore consider whether any increase in recreational pressure could materially affect the practical viability of the site's required management regime.	An explicit behavioural justification is required for the AA, based upon the final layout and access arrangements.	Ecological Planning & Research Ltd, North Meadow Visitor Questionnaire Survey 2023: Table 3.9; paras 3.45, 3.46 and 3.60 — proximity, visitor frequency, walking catchment and North Meadow as first-choice destination. Natural England, Chilterns Beechwoods SAC advice, 14 March 2022, section 2.4: evidence that residential development within easy walking distance can be particularly difficult to mitigate because frequent local recreational use may not be readily diverted to alternative greenspace. Liley (2019), Footprint Ecology, Burnham Beeches SAC: distance-decay evidence showing disproportionately greater recreational pressure from housing closest to the SAC. 2021 Census - dwellings within 500m Bellway shadow HRA Bellway FPCR review Wiltshire Council Ecology Consultation Response, Bellway application PL/2025/07863, updated 4 August 2026. Wiltshire Council Appropriate Assessment, Bellway application PL/2025/07863, 5 August 2026.	Not demonstrated

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- Conditions 16 and 17 and the Section 106 provide part of the delivery framework, but do not themselves determine the Habitats Regulations integrity test. Matters essential to demonstrating mitigation effectiveness must be sufficiently resolved before Wiltshire Council reaches a favourable AA conclusion, even where formal approval of some implementation detail may occur later.

Ref	Required assurance	Current applicant position	Conflict or missing evidence	Why it matters	Required resolution	Key evidence / sources	Status
HRA-5	Compatibility of biodiversity restoration and recreational mitigation	The Biodiversity HSA is proposed both as a grassland-restoration scheme and as part of the recreational mitigation for North Meadow	• How has the design been shown to reconcile the principal recreational-mitigation purpose of the HSA with the grassland-restoration objective? • How will trampling and dog disturbance be managed? • How will the riparian corridor, pond and SuDS outflow be protected from dogs and cattle? • Will parts of the HSA be closed during grazing? • Can the recreational pressure mitigation be delivered effectively by this design? • Can the ecological objectives be achieved while providing the expected level of access?	Natural England guidance recognises that biodiversity features within alternative greenspace can conflict with its recreational function unless carefully designed. The Council therefore needs to be satisfied that the dual ecological and recreational functions are compatible.	Unless Wiltshire Council can be satisfied that the combined recreational and ecological functions can be delivered without undermining the HSA's mitigation purpose, it cannot rely upon that mitigation when applying the integrity test.	7 November 2023 Natural England response. July 2026 LEMP, page 13, paragraphs 3.2.2 and 3.2.3, highlight some of the relevant constraints. Wiltshire Council Ecology Consultation Response, Bellway application PL/2025/07863, updated 4 August 2026. Wiltshire Council Appropriate Assessment, Bellway application PL/2025/07863, 5 August 2026. See Natural England (2021). Guidelines for Creation of Suitable Alternative Natural Greenspace (SANG). August 2021. page 10 Appendix 3: Suitable Alternative Natural Greenspace: A best practice guide. https://www.bracknell-forest.gov.uk/sites/default/files/2025-06/natural-england-guidelines-for-the-creation-of-sangs.pdf	Not demonstrated
B. Delivery and long-term assurance							
HRA-6A	Operational management, wardening and public safety An identified, accountable and adequately resourced operational management arrangement capable of reconciling the HSA's recreational, ecological and agricultural functions from first occupation.	Before the appeal, Wiltshire Council Ecology required a costed HSA Management Plan and confirmation that Natural England's NNR team was willing to assume responsibility. At appeal, the appellant relied upon the Section 106 management hierarchy of the NNR team, an approved NGO or ultimately a Management Company. No subsequent NNR commitment or identified NGO is contained in the current Reserved Matters package. The July 2026 LEMP instead anticipates management by a developer-established Management Company, while also assigning certain monitoring and review responsibilities to Newland Homes. Wiltshire Council's March 2026 EIR response identified no recorded evidence that the governance, management-capability or related delivery arrangements had by then been developed or resolved.	Neither the NNR team, an approved NGO nor the proposed Management Company has been identified as a committed and demonstrably capable operator. The relationship between the Owner, Newland and the Management Company during the initial five-year period also remains unclear. The realistic day-to-day operating model has not been demonstrated. In particular, the documents do not clearly identify: • the body conducting routine inspections and day-to-day supervision; • how the competing recreational, grassland-restoration and agricultural requirements will be managed; • who coordinates mowing, hay cutting, grazing, ecological works and other contractors; • who responds to flooding, damaged gates or fencing, livestock incidents, dog fouling, path damage and public complaints; • who has authority to redirect or temporarily restrict access; • responsibility for public-safety risk assessment, insurance and incident management; • whether a dedicated HSA warden or equivalent site operative will be provided; or • whether any reliance is placed upon Wiltshire Council's SAMM warden and, if so, the extent of that role, authority over the HSA and enduring funding.	The Biodiversity HSA is required simultaneously to establish sensitive grassland habitat and accommodate sufficient public and dog-walking use to provide effective recreational mitigation. Those functions will require continuing operational decisions rather than periodic ecological monitoring alone. Without an identified and adequately resourced operator, the Council cannot be certain that the HSA will remain safe, attractive, available and ecologically functional.	The AA should assess the management arrangement that is realistically expected to operate, rather than relying upon a hierarchy of theoretical alternatives. The responsible body, governance arrangements, expertise, land/access arrangements and financial resources should be identified and demonstrated before the Council concludes that long-term delivery is sufficiently certain. Identify the accountable day-to-day operator and the minimum operational arrangements upon which the AA relies, including: • its governance, competence, staffing and contractor arrangements; • inspection and site-supervision arrangements; • public-safety and insurance responsibilities; • authority to manage access and respond to incidents; • arrangements for coordinating recreation, hay cutting, grazing and habitat management; • any warden or ranger provision; and • legally secured funding for these functions throughout the necessary period.	July 2026 LEMP para 6.1.3 and 6.1.4 S106 Schedule 7 Wiltshire Ecology consultation response, 26 February 2024 Appeal Decision 23 January 2025 para 31 Natural England email, 29 November 2024 — the NNR management role was not committed. Wiltshire Council EIR response CAS-7464, 25 March 2026 — Council confirmed that it held no recorded information responsive to requests concerning HSA governance, monitoring, corrective funding/mechanisms, post-appeal engagement, management responsibility or S106 implementation Wiltshire Council, Visitor Engagement Warden vacancy advertisement, 23 June 2026 — full-time, two-year fixed-term post associated with the North Meadow Interim Mitigation Strategy. North Meadow and Clattinger Farm Interim Recreation Mitigation Strategy 2023–2028, sections 12–13 — governance, warden priorities, monitoring and preparation of a longer-term strategy.	Not demonstrated
HRA-6B	Secure long-term ownership and control of the HSA land A legally secure, willing and adequately resourced long-term owner or controlling body, with sufficient legal control to secure the continued operation of the HSA for the full period required by the mitigation.	The executed Section 106 records that, at 16 December 2024, the trustees of the Tony John Hooper Smith Will Trust owned part of the application land under titles WT290630 and WT247389, while Newland Homes Limited owned part under title WT444419. The deed defines "Owner", unless otherwise stated, as the trustees and Newland Homes jointly and severally. However, neither the deed nor its appended plans identifies which title or titles contain the Biodiversity HSA and Recreational HSA. Schedule 7 paragraph 5.1 requires the Owner to maintain the HSA for at least five years and thereafter until responsibility for management has been transferred to the NNR team, an approved NGO or, as a last resort, a Management Company. Paragraphs 6–9 provide for transfer of management responsibility but do not require transfer of the freehold or another controlling interest in the HSA land.	The long-term ownership and land-control structure has not been demonstrated. In particular, it is unclear: • which registered title or titles contain the two HSA areas; • who currently owns each part of the HSA; • whether the present owner intends to retain the HSA for the full period required by the mitigation; • whether ownership will transfer to the Management Company or remain with a separate landowner; • what legal rights will enable the appointed manager to enter, inspect and operate the land; • who will carry occupier's liability, insurance and public-safety responsibilities; • whether an intended recipient has agreed to accept the land or management obligations; • what funding or endowment will accompany any transfer; and • how the restrictions on encumbrances, licences and similar interests in paragraphs 5.3 and 5.4 are compatible with the operational rights required by a separate manager. Although the Section 106 obligations bind successors in title, clause 7.3 releases an outgoing owner from liability for breaches arising after disposal, and clause 10 requires only notification of a change in ownership. It does not require prior Council approval or demonstration that the successor is willing, competent and adequately resourced.	The fact that planning obligations run with the land does not itself demonstrate that the future registered proprietor will have the financial and operational capacity to deliver the mitigation. A separation between legal ownership, management responsibility, monitoring and funding could leave no single body with complete control and accountability for the HSA.	Before reaching a favourable Appropriate Assessment, the Council should: • obtain up-to-date official copies of the registers and title plans for WT290630, WT247389 and WT444419; • map those titles against the final Biodiversity and Recreational HSA boundaries; • identify the current and intended long-term owner of every part of the HSA; • confirm whether the land will be retained or transferred and, if transferred, identify the recipient, transfer mechanism, timing and terms; • demonstrate the recipient's willingness, competence and financial capacity; • secure the necessary access, operational, insurance and liability arrangements; • identify the funding or endowment accompanying the land or management responsibility; • confirm how any successor owner will be identified and bound by the obligations, and what mechanism will ensure that ownership changes do not undermine the effective delivery, control and funding of the mitigation; and • reconcile paragraphs 5.3 and 5.4 with the rights required by the long-term manager.	Executed Section 106, 16 December 2024: • parties and Background A–B, page 3; • definitions of Maintenance Period and Management Company, page 23; • definition of Owner and Plans 1–3, page 27; • clauses 2.10 and 3.2, pages 36–37; • clauses 7.3, 7.11 and 7.12, pages 38–40; • clause 10, page 41; • Schedule 7 paragraphs 5–9 and 13, pages 68–71; • Schedule 2 paragraphs 7–12, pages 59–61, as a comparison with the express transfer provisions for ordinary open space; • Plans 1 and 3, pages 78 and 80. Further evidence required: current official copies of the registers and title plans for WT290630, WT247389 and WT444419, mapped against the final HSA boundaries.	Not demonstrated

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HRA-7	Costed and enduring funding	Schedule 7 of the Section 106 requires the Owner initially to maintain the HSA and subsequently to pay an annual fee to the approved managing body during the Maintenance Period. It also requires the HSA Management Scheme to address estimated long-term management costs. The July 2026 HMMP identifies private funding by Newland Homes. However, the amount of the annual fee, its calculation, indexation, review arrangements and the enduring source of income have not been demonstrated.	No costed programme; no agreed annual fee; no clear calculation methodology; no demonstrated indexation/review mechanism; no identified reserve or contingency provision; no clear funding for visitor monitoring and adaptive measures; no clear link between homeowner charges and Schedule 7 HSA costs; no identified funding for any HSA-specific warden, ranger or equivalent routine site-supervision function. The realistic long-term manager and operating model have not yet been established. It is therefore unclear on what basis the full annual cost of long-term management has or could presently be calculated. The proposed bond is security against default and does not itself demonstrate funding for routine management.	An obligation to pay an annual fee does not itself demonstrate that the fee will be sufficient or that an enduring income source exists. Unless the full operating, monitoring and corrective-action costs are established and linked to a secure, indexed funding mechanism, the Council cannot be certain that the mitigation will remain deliverable for the necessary period.	A costed management, recreational-effectiveness monitoring and adaptive-management programme, linked to a legally secure and indexed funding mechanism, with adequate reserve/contingency provision for additional or corrective measures.	Section 106 Schedule 7; July 2026 LEMP, management responsibility section; July 2026 HMMP funding statement Wiltshire Council EIR response CAS-7464, 25 March 2026 Wiltshire Council Ecology Consultation Response, Bellway application PL/2025/07863, updated 4 August 2026. Wiltshire Council Appropriate Assessment, Bellway application PL/2025/07863, 5 August 2026.	Not demonstrated
HRA-8	Monitoring of recreational effectiveness	The grassland-restoration monitoring is well explained. The latest revision restores a recreational function to the Biodiversity HSA, but the monitoring remains largely concerned with whether habitats achieve botanical and structural targets.	No application-specific monitoring framework has been identified that demonstrates whether the HSA is achieving its recreational-mitigation purpose. Natural England consultation response, 7 November 2023: advised visitor surveys to confirm use of the HSA by new residents, identify snagging problems requiring action and assess indicative visitor capacity. The July 2026 LEMP is itself unclear as to monitoring responsibility: paragraph 6.1.4 assigns monitoring and the five-year report to Newland Homes, whereas paragraph 8.1.1 states that the Management Company will take responsibility for monitoring. The final scheme should identify one clear, accountable monitoring structure. Existing visitor-counter infrastructure at North Meadow should be considered when designing the baseline and ongoing monitoring framework. By comparison, the proposed Hannick monitoring condition expressly requires performance indicators, measurable targets, reporting procedures and remedial measures where the identified objectives are not met.	The outline HRA relied upon the mitigation package to avoid adverse effects arising from additional recreational pressure. This is the most critical element of the mitigation to be monitored.	Required resolution: an effectiveness-monitoring framework addressing matters such as: • use of the HSA; • use by dog walkers; • route choice; • visits from the development towards North Meadow; • changes in visitor pressure at the SAC; • frequency and timing of monitoring; • reporting responsibility; • review by the competent authority; and • the baseline and measurable criteria against which successful recreational diversion will be judged.	July 2026 LEMP, section 8 and Table 7 July 2026 HMMP Monitoring Strategy page 49 Natural England 7 November 2023 Wiltshire Council EIR response CAS-7464, 25 March 2026 Wiltshire Council, Hannick Committee Report, 12 August 2026, proposed Condition 8 — Ecological Monitoring Plan. Wiltshire Council Ecology Consultation Response, Bellway application PL/2025/07863, updated 4 August 2026. Wiltshire Council Appropriate Assessment, Bellway application PL/2025/07863, 5 August 2026.	Not demonstrated
HRA-9	Effective adaptive management and corrective action A clear and enforceable mechanism must exist from the start of occupation to review recreational-effectiveness monitoring and implement timely corrective measures if the HSA is not achieving its mitigation purpose.	Schedule 7 provides for annual Monitoring Reports, a hierarchy of possible managing bodies, named liaison arrangements and a Steering Committee. The July 2026 LEMP also provides for review and amendment of habitat management where ecological monitoring identifies a need for change.	The Section 106 does not appear expressly to require the Steering Committee to operate during the initial five-year period when the HSA remains under the Owner's management. Nor do the current management documents clearly establish an equivalent decision-making body during that period. This is significant because the first years of occupation are likely to provide the earliest evidence of actual resident behaviour and whether the HSA is successfully diverting recreational use from North Meadow. The existing arrangements also do not clearly identify: • what recreational outcomes would constitute underperformance; • who reviews the evidence during the first five years; • who decides that corrective action is required; • what corrective measures are available; • the timescale for implementing them; or • how those measures would be funded. The Section 106 contains default and Council step-in provisions, but those concern failure to comply with the secured obligations. They are not obviously equivalent to an adaptive-management process responding to evidence that an otherwise maintained HSA is failing to achieve sufficient recreational diversion.	The effectiveness of the HSA cannot depend upon identifying problems only after a five-year establishment period. Recreational habits may become established soon after occupation, and any inadequacy in the attractiveness, accessibility or functionality of the HSA may therefore become apparent during the initial management period. If the Appropriate Assessment relies upon adaptive management to address uncertainty in recreational behaviour, the mechanism for detecting underperformance, making decisions and implementing funded corrective action should operate from the point at which occupation begins to generate the effect being mitigated.	Establish an adaptive-management framework operative from first occupation, identifying: • the body responsible for reviewing recreational-effectiveness monitoring; • the relationship of that body to the Section 106 Steering Committee; • the indicators or decision criteria for identifying underperformance; • the range of practicable corrective measures; • responsibility and timescales for implementing those measures; • the funding mechanism for additional or corrective works; and • how Wiltshire Council can require action where monitoring indicates that the HSA is not achieving its mitigation purpose. Clarify whether the Section 106 Steering Committee will be established from first occupation rather than only following transfer of management after the initial five-year period.	Section 106: definition of Steering Committee, p.34; Schedule 7 paras 5–9, pp.68–70 Natural England consultation response, November 2023: advised visitor surveys and a steering group capable of agreeing modifications. Wiltshire Council EIR response CAS-7464, 25 March 2026 July 2026 LEMP, section 8	Not demonstrated

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HRA-10	Duration and legal security for the full period of effects	The mitigation strategy needs to be secured for the full period of the effects. HMMP, LEMP and Section 106 are not consistent on duration.	The July 2026 LEMP itself contains different duration formulations: five years followed by 80 years; a total 80-year period followed by management in perpetuity; monitoring for at least 80 years; and individual monitoring prescriptions operating for the 30-year BNG period. These should be reconciled with the Section 106 Maintenance Period and with Condition 16's requirement for the approved HSA to operate for the lifetime of the development. The HMMP's 30-year BNG framework does not align with the longer duration required for the HRA mitigation as described elsewhere in the submitted documents Mitigation must remain effective and legally secured for as long as it is necessary to avoid adverse effects arising from the development. If 80 years is considered sufficient, what is the evidential basis for concluding that the development will cease to generate the relevant recreational effects after 80 years?	The mitigation must be legally secured, adequately funded and effective for the full period during which the development may give rise to the effects being mitigated.	Required resolution: • amend all documents consistently; • distinguish HRA mitigation from BNG; • confirm the precise Section 106 obligations; • identify how successors in title are bound; • confirm the provisions for default, enforcement and step-in; • secure implementation before occupation; • where mitigation is required beyond the Section 106 Maintenance Period, identify the enforceable legal mechanism by which management, monitoring and funding will continue; • explain the effect of the Section 106 provision allowing an alternative Maintenance Period to be agreed and how any reduction in duration would remain compatible with the AA.	July 2026 HMMP (page 3) July 2026 LEMP (paras 1.4.4, 3.1.5, 8.1.2 and table 7) Section 106 page 23 and page 68 paras 5–9	Not demonstrated
C. In-combination effects							
HRA-11	In-combination effects and interaction with neighbouring recreational mitigation including Mac Mic and Bloor, insofar as they are relevant plans or projects at the date of the Appropriate Assessment	HMMP, LEMP and associated revised drawings and documents do not consider the impact of these neighbouring developments on the mitigation strategy. The July 2026 Bellway documents acknowledge potential recreational connectivity with the adjoining Hannick scheme and compare the respective mitigation offers. However, they do not assess likely cross-use, combined recreational capacity or how a connected network would influence movement towards North Meadow or use of the Newland HSA.	It cannot be assumed that, where Newland and other relevant plans or projects, including Mac Mic and Bloor, each propose an individual mitigation strategy, there will be no in-combination effect on the integrity of North Meadow. The in-combination visitor behaviour analysis needs to consider: • could use of the Newland HSA by residents of neighbouring developments alter the capacity, attractiveness or visitor-diversion assumptions upon which Newland's mitigation relies? • could cross-use of neighbouring mitigation areas alter the visitor patterns assumed by the individual schemes? • how will the Thames Path, Route 45 and other rights of way influence movement between the developments, their mitigation areas and North Meadow? The AA should also identify the current scale of relevant planned and permitted residential development within the North Meadow zone of influence and explain whether the strategic mitigation assumptions upon which the Newland scheme relies remain applicable at that scale. Where the current development trajectory materially exceeds that assumed when NMIMS was prepared, the Council should identify the evidence relied upon to conclude that the strategic mitigation package remains effective. The Hannick officer report prepared for the 12 August 2026 committee quantifies an in-combination total of 211 units comprising Hannick, Bellway, Bloor and the Ashton Keynes holiday-lodge scheme. It does not identify Newland or Mac Mic within that calculation or explain their exclusion. This illustrates the need for the Newland AA to identify transparently the plans and projects included, the development totals relied upon and the reasons for excluding any apparently relevant scheme. The Bellway AA identifies Newland and Mac Mic among the relevant plans and projects and records Natural England's advice that residential growth within the Inner Zone significantly exceeds that anticipated when the NMIRMS was prepared. This further demonstrates the need for a transparent and consistently applied in-combination assessment across the Cricklade applications.	The Appropriate Assessment must consider the effects of Newland in combination with relevant plans and projects and should address whether neighbouring mitigation schemes alter the behavioural assumptions or effectiveness of the Newland HSA.	The Appropriate Assessment should explicitly consider whether neighbouring developments and their recreational mitigation could alter visitor behaviour or the effectiveness of the Newland HSA, and should identify the evidence relied upon to rule out an adverse in-combination effect.	Mac Mic Planning Application PL/2026/02134 Bloor Homes Planning Application PL/2021/10404 NMIMS 2023–2028 February 2026 CCL Issues Paper Appendix H CSA Environmental, Bellway Information to Inform Habitats Regulations Assessment, July 2026 Consistency between Bellway and Hannick — Information to Inform HRA, July 2026 Wiltshire Council Appropriate Assessment for Hannick, 25 February 2026 Wiltshire Council, Officer Report to Strategic Planning Committee, Hannick application PL/2023/10331, meeting 12 August 2026. Wiltshire Council Ecology Consultation Response, Bellway application PL/2025/07863, updated 4 August 2026. Wiltshire Council Appropriate Assessment, Bellway application PL/2025/07863, 5 August 2026.	Not demonstrated
D. Hydrology							
HRA-12	Hydrological regime, floodplain function and water quality The final development, HSA and drainage scheme must not adversely alter the hydrological regime, floodplain function or water quality upon which the qualifying lowland hay meadow habitat of North Meadow SAC depends, including over the lifetime of the development and under climate-change conditions.	Surface-water runoff is to be collected, attenuated and treated before discharge to the River Thames. The HSA includes ponds, wetland habitat and landscape works within the Thames floodplain. In its response dated 26 February 2026, the Environment Agency objected to the Reserved Matters application because the submitted flood-risk information does not adequately demonstrate that the development will avoid increasing flood risk elsewhere. It considers the flood-storage compensation inadequate when the required climate-change allowance is taken into account. The Environment Agency also states that it is unclear whether the proposed HSA ponds, wetland and landscaping will reduce floodplain storage and says this must be assessed. Confirmation is required whether that objection has subsequently been withdrawn or superseded.	The final hydrological consequences of the Reserved Matters scheme have not yet been demonstrated. In particular: the effect of HSA ponds, wetlands, landscaping and any ground-level changes on floodplain storage remains unresolved; the necessary climate-change allowance has not been satisfactorily incorporated; the hydraulic relationship between any flood-storage losses and proposed compensation has not yet been demonstrated; the drainage outfall design remains uncertain; and it is not clear how the final flood-risk and drainage assessment will be translated into the Appropriate Assessment of effects on the SAC's supporting hydrological processes. The Environment Agency additionally identifies potential erosion, turbidity and blockage risks associated with the currently shown outfall arrangement. The applicant has indicated that the detailed FRA and Drainage Strategy required by Condition 14 will be submitted following determination of Reserved Matters. The Council should therefore identify whether any matters deferred to Condition 14 are necessary to exclude an adverse effect on the SAC's hydrological supporting processes in the current AA.	North Meadow is a floodplain meadow whose qualifying habitat depends upon an appropriate hydrological regime. The SAC conservation objectives require the maintenance or restoration of the supporting processes upon which the qualifying habitat relies. Natural England's conservation objectives and supplementary advice are intended to provide the framework for HRA and Appropriate Assessment. A favourable Appropriate Assessment should therefore be based upon the final hydrological and drainage arrangements and should establish that changes to floodplain storage, flood behaviour, surface-water discharge or water quality will not adversely affect those supporting processes.	The latest EA response identified an unresolved objection; confirmation is required whether that objection has since been withdrawn or superseded. If the objection has not been superseded, resolve the Environment Agency's outstanding flood-risk objection, including the required assessment of floodplain storage and climate change, and then assess the resulting final HSA, drainage, SuDS, ground level and outfall arrangements within the Appropriate Assessment. The AA should demonstrate that the final scheme will not adversely alter water levels, water quality or other hydrological processes supporting North Meadow SAC.	Environment Agency response, 26 February 2026 NHL Response to Consultee Comments Natural England response, 9 February 2017 Planning consultation: N/16/12052/OUT - OUTLINE PLANNING APPLICATION FOR UP TO 140 DWELLINGS (ACCESS NOT RESERVED)	Not demonstrated