



CRICKLADE TOWN COUNCIL SUPPLEMENTARY REPRESENTATIONS 10TH AUGUST 2026
NEWLAND HOMES LIMITED – STONES FARM, WEST MILL LANE, CRICKLADE 2026/00347

Background to this application for Approval of Reserved Matters (Appearance, Landscaping, Layout and Scale)

Cricklade Town Council made a representation regarding this application on 9th March 2026. Since then there have been some material changes to the plans and so we are taking the opportunity to make a follow up submission to be read as supplementary to that original 9th March 2026 representation.

Please note: previous submission should not have referred to “all matters not dealt with at the outline stage” but just the reserved matters noted above.

Further Representations

The table on pages 2 to 4 below lists the points (a to n) we raised in our 9th March 2026 submission with – in the right-hand column - the subsequent Newland Homes reply and our 10th August follow-up comments. On page 5 is a plan of the amended Habitat Support Area (HSA) and on page 6 an excerpt of the section 38 adoptable highways and footways plan. On page 7 is a summary taken from the proposed Habitat Management and Monitoring Plan (HMMP) and, on page 8, the response of Cricklade Court Leet to that document.

Comments

We are pleased to see that a number of our March 2026 representations have been accommodated. However, the following are still of concern to us:

a	We note that flood risk matters will be dealt with after these Reserved Matters. Our March 2026 concerns still stand Noted
b	The Foul Water scheme will also be submitted after Reserved Matters. Our March 2026 concerns still stand and, if anything, have increased. Noted
g	Street lighting should be installed on the shared use link to West Mill Lane. Two or three lights will be needed in the interests of public safety. We can accommodate this however, not without confirmation from Jenna Buss first as we do not wish to accommodate one, only to compromise another.
l	We echo the concerns of Cricklade Court Leet that, despite improvements, there are important matters still to be resolved which are effectively summarised in these five questions regarding the Habitats Regulations Assessment: Will the mitigation actually change visitor behaviour? Is there a realistic, costed and secure delivery model? How will Wiltshire Council know whether mitigation succeeds, and what happens if it does not? Is the mitigation secure for the necessary duration? What about the wider effects such as: neighbouring development and hydrology? A response from our ecologist is due to be provided.
m	Road safety issues remain unresolved. Firstly, the 90 ⁰ corner in Jenners Yard which requires double yellow lines and, secondly, the need for a Zebra crossing on West Mill Lane as this should be a safe route to St Sampson’s Primary School for children of the new development. Access was approved at Outline. Highway consultee comments have been accommodated.
n	Allotment space is required to comply with Cricklade Neighbourhood Plan LAF2. This can be offsite and CTC has a site that might be suitable. Neither the Outline consent nor signed S106 agreement stipulate allotments are required.

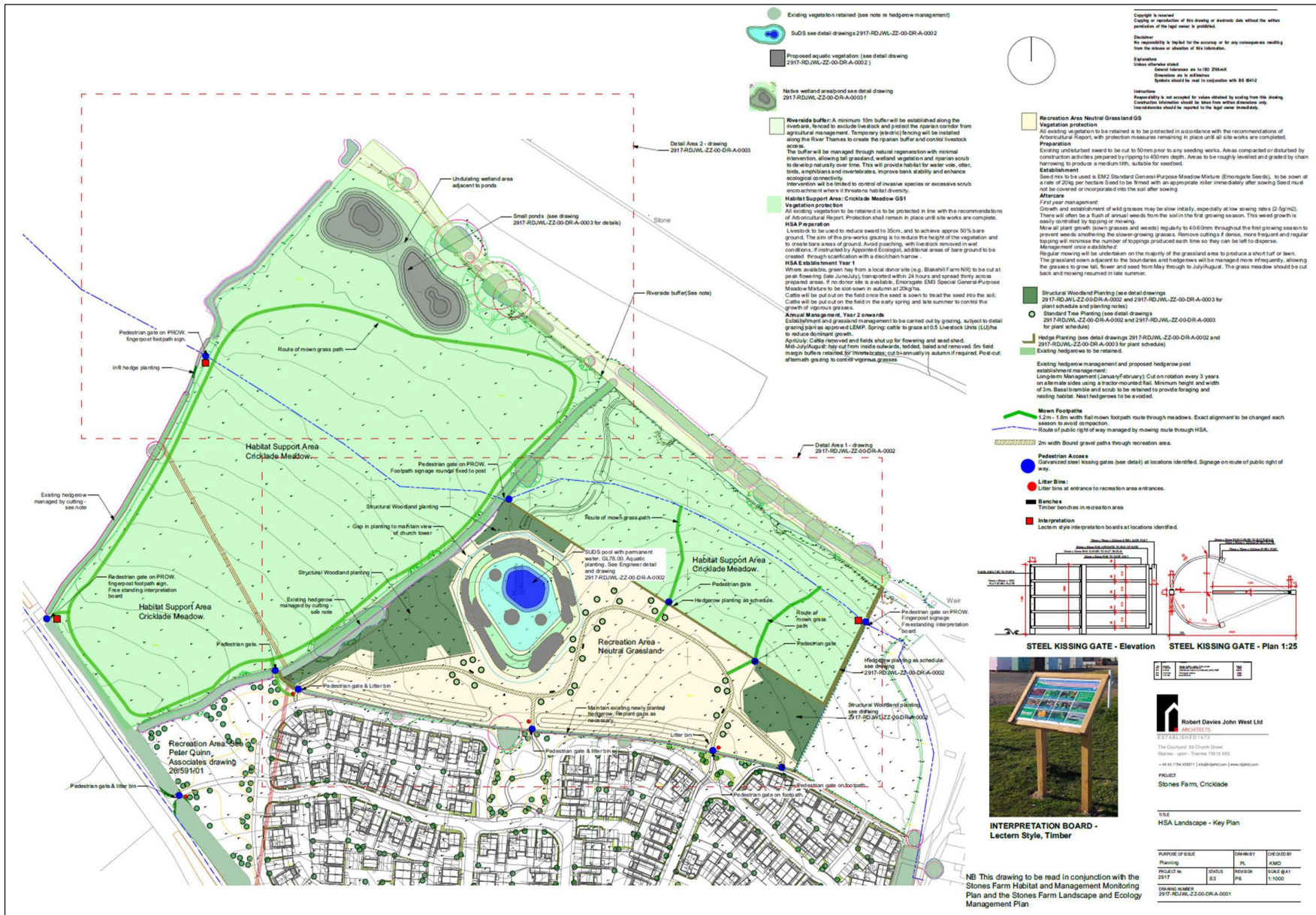
New	We note that the submission from the NHS Integrated Care Board for the close-by Mac Mic site (2026/02134) states that the GP provision in Cricklade is currently at capacity and so a financial contribution is required. We note that the Early Years financial contribution previously required from this development is no longer needed because of falling birth rates.
-----	---

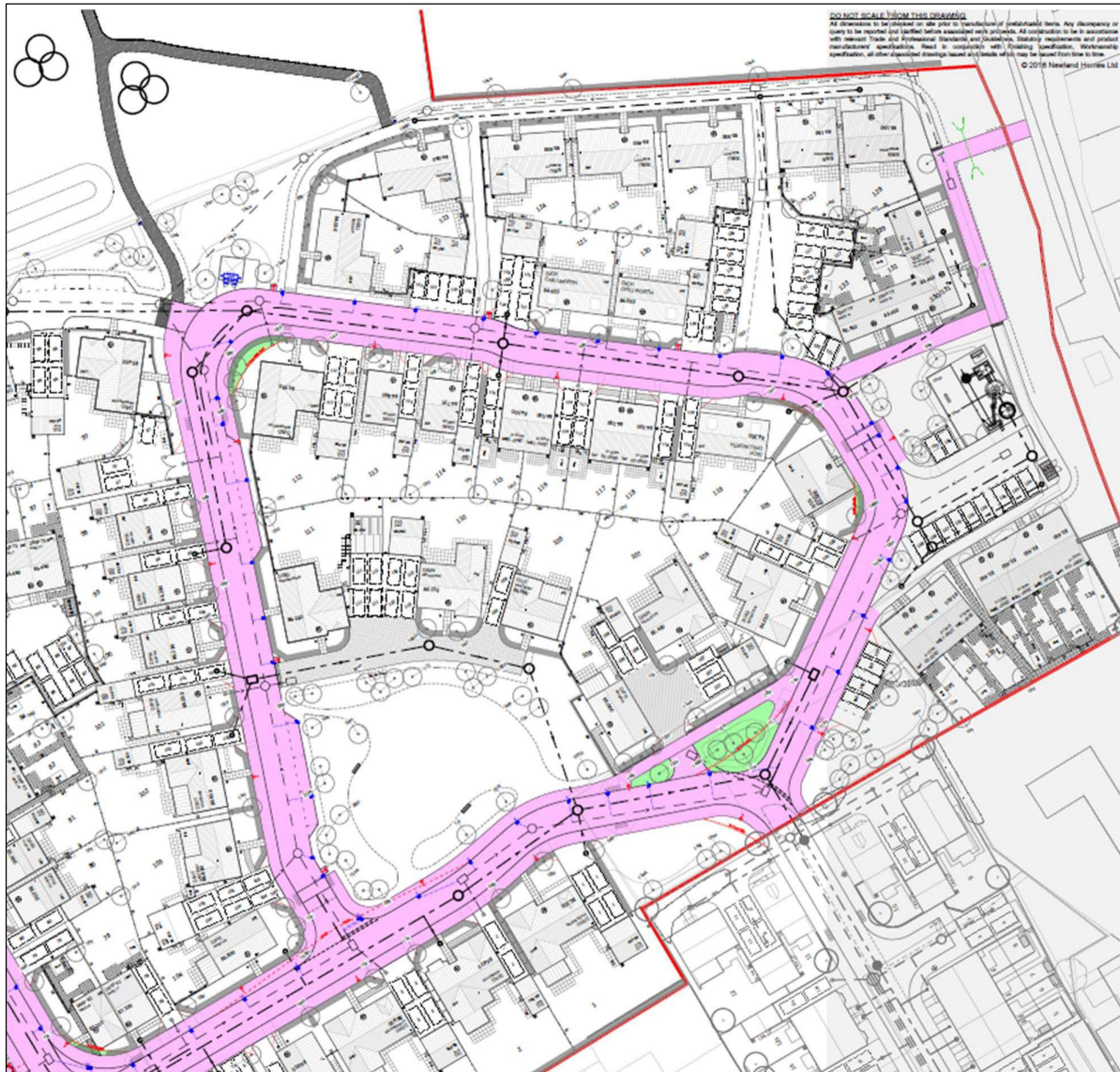
Conclusion: This document should be considered as a supplement to the Cricklade Town Council submission of 9th March 2026

Cricklade Town Council submission 9 th March 2026		Newland Homes Limited (NHL) response summary and follow-up CTC comments
a	Flood Risk on neighbouring sites has not been properly considered – see the written submissions from Cricklade Court Leet, the Environment Agency and the WC Drainage Engineer	NHL: The existing design has the capacity to achieve the required 9.4 litres per second discharge rate and so the attenuation pond does not need to be enlarged. Details of the Detailed drainage scheme, Flood Risk Assessment, and Drainage Strategy to meet Condition 14 of the Outline Planning Consent will be submitted following the determination of the Reserved Matters. CTC: noted but our 9 th March comments still stand
b	The current foul water treatment capacity in Cricklade is inadequate resulting in untreated effluent being discharged directly into the River Thames. A condition should be placed requiring Thames Water to confirm in writing that, once their current upgrade works have been completed later this year, the Cricklade STW will be able to deal with the expected volumes from this development in addition to the existing level.	NHL: Details of the Foul Water Drainage scheme to meet Condition 22 of the Outline Planning Consent will be submitted following the determination of the Reserved Matters. CTC: noted but our 9 th March comments still stand
c	In view of the visual sensitivity of the site from North Meadow and the Thames Path National Trail, the preponderance of red roofs should be significantly reduced and replaced with grey slate to more properly reflect the local vernacular.	NHL: The majority of the dwellings will have grey roofs (75 out of 140) and having a variety of types and colour avoids repetition and blends with the local architectural language. CTC: noted
d	The 28 visitor parking spaces shall all be provided in layby type arrangements rather than just a proportion as shown on the plan. Parking on road will restrict traffic flows around the development.	NHL: 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. CTC: noted
e	To ensure consistency with the market housing, the parking provision for the Affordable Housing shall be in the curtilage rather than in parking courts.	NHL: 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. CTC: noted

f	The Wiltshire Council Design Code requires that the footprint of the house shall not be greater than the area taken by the garden which does not appear to be the case for every plot.	NHL: Garden sizes have been amended CTC: noted
g	The footpath links to the east, west and to the Recreational HSA shall be tarmac with street lighting provided at the West Mill Lane link	NHL: 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. CTC: noted but the submitted section 38 plan (page 6 below) does not show any street lighting on the eastern boundary link to West Mill Lane. In the interests of enabling safe access during the hours of darkness at least two street lights should be provided.
h	In the interests of amenity – especially to children – the Local Equipped Area for Play would be better located closer to the entrance to the development from Jenners Yard.	NHL: 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 anti-social 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. CTC: noted
i	In the interests of the amenity of residents the footpaths on the Recreational HSA shall be hoggins (rather than just mown paths) to guarantee year round access in all conditions.	NHL: 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. CTC: Noted
j	The design of the Biodiversity HSA will not mitigate the widely recognised recreational pressures on the North Meadow SAC caused by visitor numbers. The scheme as currently constituted will guarantee that these pressures will increase. To stand any chance of success the HSA must be revised to:	NHL: 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.

	- 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, - 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, - Convert at least one of the two five-bar gates that open on to the old railway line to allow pedestrian access thereby enabling more circular walks to be created. (This is in addition to the pedestrian and cycle access point from the residential area that will be created).	CTC: noted and features shown on Landscape Plan on page 5 below.
k	The Recreational HSA Management Plan should be amended to include the provision of more bins – especially on all entrances/exits to the site and more benches – especially by the areas of green space.	NHL: 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. CTC: noted and features shown
l	The Biodiversity HSA should be updated to demonstrate how the programme will be delivered and funded and which organisation will be delivering it.	NHL: details can be found within the revised HSA Meadow landscaping drawings and the Habitat Management and Maintenance Plan June 2026 (HMMP for Condition 16) and; Landscape & Ecological Management Plan July 2026 (LEMP for Condition 17). CTC: noted but see the summary of HMMP and the subsequent Cricklade Court Leet comments on pages 7 & 8 below.
m	In the interests of road safety: - the road access through Jenners Yard shall be reviewed and the possibility of double yellow lines or road widening considered - the installation of a Zebra crossing on West Mill Lane shall be provided	NHL: no comment logged CTC: we are pleased to note the intention for a 20mph zone from the junction of Jenners Yard with West Mill Lane. However, it remains the case that cars parked on the 90° bend in Jenners Yard create an obstruction to passing vehicles. Safe access, particularly for children from the new development to St. Sampson's school can only be protected by a Zebra crossing across West Mill Lane.
n	Allotment spaces shall be provided – either on or off site.	NHL: no comment logged CTC: The Cricklade Neighbourhood Plan (policy LAF2) requires allotment space to be provided. They can be off-site and CTC does own land which might be suitable.





Excerpt from s38 adoptable map. Roads to be adopted by WC shown in pink.

Showing 3m wide shared use (pedestrian & cycle) access to West Mill Lane at top right quadrant.

Street lighting required on this link in the interests of public safety.

The Habitat Management and Monitoring Plan (HMMP) v2 25-6-2026 prepared by Ethos Environmental Planning includes the following summary:

“Baseline Summary

The site comprises two fields currently dominated by modified grassland and areas of other neutral grassland, bounded by native hedgerows with occasional mature willow trees. The River Thames forms the northern boundary of the site and is locally bordered by areas of scrub and riparian vegetation. All existing hedgerows, trees and riparian habitats will be retained and enhanced as part of the scheme.

Summary of Proposals

The primary habitat enhancement will involve the restoration of the existing modified grassland to species-rich lowland meadow, delivered through traditional hay meadow management including grazing, annual hay cutting and nutrient reduction. The resulting grassland will provide habitat function consistent with the nearby North Meadow and Clattinger Farm SAC, helping reduce fragmentation of semi-natural grasslands within the local landscape.

A riparian buffer will be maintained along The River Thames, where management intervention will be minimal to allow the development of a semi-natural grassland and scrub mosaic. This area will provide suitable habitat for riparian species such as water vole and otter.

A network of ponds will also be created within the northern part of the site to provide aquatic and wetland habitats and improve ecological connectivity across the riparian corridor.

Purpose of Management Plan

The Habitat Support Area (HSA) at Stones Farm has been designed primarily to provide mitigation for potential recreational impacts on the North Meadow and Clattinger Farm Special Area of Conservation (SAC) arising from the proposed residential development. The purpose of the HSA is therefore to provide high quality semi-natural habitats which function as a landscape buffer between the development and The River Thames corridor, while also contributing to the conservation objectives of the SAC through the restoration and long-term management of species-rich grassland.

The planning application for the development was submitted prior to the mandatory requirement for Biodiversity Net Gain under the Environment Act 2021, and as such the HSA is not being delivered as a Biodiversity Net Gain site or for the purpose of generating biodiversity units. Instead, the habitat proposals are designed specifically to mitigate potential impacts on the SAC and to deliver ecological enhancements in line with the agreed Habitat Support Area Strategy. This Habitat Management and Monitoring Plan (HMMP) has been prepared using the Natural England HMMP template, which provides a structured framework for setting out habitat creation, management prescriptions and monitoring requirements. While the template is commonly used for Biodiversity Net Gain projects, in this case it is used solely to provide a clear and robust framework for the delivery and long-term management of the Habitat Support Area.”

The Cricklade Court Leet have responded to the above in their submission of 6th August 2026 from which the following are extracts:

“We are pleased to see that the recreational function of the Biodiversity HSA has been restored, with access from the development and mown paths around the field. The greatly increased habitat management detail provides a much better understanding of the proposed scheme.

The principle of using an HSA as part of the mitigation strategy was accepted at outline stage. What now needs to be determined is whether the final detailed mitigation package enables Wiltshire Council to ascertain, without reasonable scientific doubt, that the proposal will not adversely affect the integrity of North Meadow SAC.

In our view, the revised material represents a significant improvement, but important matters remain unresolved. As a result, the effectiveness, deliverability and long-term security of the mitigation have not yet been demonstrated with the certainty required for a favourable Appropriate Assessment.

Newland presents an unusually demanding mitigation case. The development is sufficiently large to generate material recreational demand, while its exceptional proximity means that North Meadow will remain readily accessible to future residents. Even a relatively modest shortfall in HSA use could consequently translate into additional frequent visits to the SAC. This makes a defined recreational outcome, measurable success criteria and effective corrective mechanisms particularly important.

The revised documents describe the physical and ecological management of the HSA in considerable detail. However, describing the recreational offer is not the same as demonstrating its behavioural effectiveness.

Principal outstanding Habitats Regulations Assessment (HRA) issues:

- A. Will the mitigation actually change visitor behaviour?
- B. Is there a realistic, costed and secure delivery model?
- C. How will Wiltshire Council know whether mitigation succeeds, and what happens if it does not?
- D. Is the mitigation secure for the necessary duration?
- E. Wider effects: neighbouring development and hydrology?

The Court Leet is not suggesting that every aspect of the mitigation remains unresolved. Significant additional detail has now been provided, particularly in relation to habitat establishment and management. The outstanding difficulty is whether the complete package has yet demonstrated that the mitigation will achieve its HRA purpose and whether a coherent long-term structure for ownership, operational management, funding, monitoring and corrective action has been secured.

On the information presently available, we do not consider that those assurances have yet been demonstrated sufficiently to support a favourable Appropriate Assessment. We therefore ask the Council to obtain and assess the information necessary to resolve the matters identified in Appendix 1 before determining the Reserved Matters application.”