

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jenna Buss
Date:	18/05/2026 24/08/2026
Application number:	PL/2026/00347
Proposal:	Approval of Reserved Matters (Appearance, Landscaping, Layout and Scale) Following Outline Planning Permission PL/2022/02452 for 140 Dwellings, a Habitat Support Area and Associated Landscaping and Works
Site address:	Land at Stones Farm, West Mill Lane, Cricklade
Case officer:	Joe Richardson

Recommendations:

	No Comment
	Support
	No objection
	Condition (no objection subject to conditions)
x	Objection - further information required
	Objection in principle
x	HRA completed/required

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date)
1	HSA	Habitat Regulations, CP50, NPPF	Clarification of the management and monitoring of the HSA and Recreational space to inform the AA (see below).	

The outstanding document(s) listed above are needed to enable the council's ecology team to consider all the relevant impacts and benefits of the proposed scheme. The council's ecologists will provide a further response once all the above information has been submitted via the case officer.

Please Note: When resubmitting a revised document, ALL changes must be highlighted to enable review.

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:

- [HSA Landscape -Key Plan 2917-RDJWL-ZZ-DR-A-0001](#). July 2026. Robert Davies John West Ltd
- [HSA Landscape-Detail Area1-Recreational Area 2917-RDJWL-ZZ-00-DR-A-0002](#). July 2026. Robert Davies John West Ltd
- [HSA Landscape-Detail Area 2-HAS Area, ponds 2917-RDJWL-ZZ-\)\)-DR-A-0003](#). July 2026. Robert Davies John West Ltd
- [Habitat Management and Monitoring plan](#). June 2026. Ethos

- Landscape and Ecological Management Plan. July 2026. Ethos
- Landscape Maintenance Plan. June 2026. Peter Quinn Associates
- Detailed Landscape Proposals. June 2026. Peter Quinn Associates
- 10 Year Landscape Maintenance Programme. January 2026. Q

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.

This application aims to mitigate the impacts of recreational pressure through the provision of a Habitat Suitability Area together with Recreational Greenspace. As outlined within the Inspectors comments APP/Y3940/W/24/3351265 section 29, the proposed HSA would be consistent with the Site Improvement Plan (SIP) supporting action 2a (to reduce the fragmentation of semi natural grasslands in the area around the SAC) action 2b (to secure the long term conservation management of buffer land adjacent to North Meadows and to allow semi natural grassland to be restored) and 4a (to seek to minimise the impact of high levels of trampling by the general public) by providing additional recreational and accessible greenspace.

The following provides a summary of the mitigation measures secured to date, alongside the additional documents listed above for the reserved matters application. Collectively, these documents detail the proposed mitigation measures and the information necessary to inform an Appropriate Assessment.

- SAMM payment contributions. As the site lies within the inner zone of influence (0-4.2km) a Strategic Access Management and monitoring Payment is required as outlined within the Interim Recreational Mitigation Strategy for the North Meadows which will secure payment of £331.62 per unit prior to the commencement of development as detailed in Schedule 8 of the S106 agreement. December 2024.
- The updated HMMP provides details of the management prescriptions to be undertaken for the HSA to include creation of woodland, ponds and lowland meadows which will be managed by grazing and mowing. This will provide not only alternative access to greenspace for local residents but will also provide additional areas of habitat similar to that within the adjacent SAC thereby maintaining the extent and distribution of qualifying natural habitats (HMMP.June 2026. Ethos).
- The HSA will be managed in perpetuity with annual reports submitted to the LPA. The HSA will be created prior to first occupancy with the LPA confirming completion through the issue of a Completion Certificate to be issued prior to first occupation as outlined in Schedule 7 of the S106.
- For the initial 5 year period, the management will be the responsibility of the owner (Newland Homes). Once the 5 year period has ended the management of the HSA will either become the responsibility of the NNR Team at NE or a private management company will be established. Management will remain the responsibility of the owner until such a time that alternative management is established, as outlined within the S106.
- The LPA will sit on the Steering Group of the agreed management company once established.

- The HMMP submitted outlines the management proposals for the HSA. The HSA will be created to provide high quality semi-natural habitats which function as a landscape buffer between the development and the River Thames corridor whilst also contributing to the conservation objectives of the SAC through the restoration of long term management of species rich grassland. Monitoring will include soil sampling, quadrat surveys and updated condition assessments every 5 years with annual monitoring reports submitted to the LPA for review from year 1 after completion as outlined in section 5.2 of Schedule 7 (S106 November 2024). According to the HMMP, ecological monitoring of the HSA will be undertaken by Ethos and include updating of species lists and condition assessments of all habitats, the production of a report detailing progress and future proposals to achieve condition targets and photographs for comparison. Adaptive management approaches will also be implemented to ensure that target conditions are achieved and guided by the risk identification framework.
- The 10 Year Landscape Maintenance Plan provides details of the management of the recreational areas to include amenities such as those outlined within Appendix 4 of the Interim Recreational Mitigation Strategy such as dog waste bins and maintenance of walking routes. The document details when these monitoring activities will be undertaken for the first 10 years and then annually in perpetuity.
- Planting details are provided within the HSA Landscape Plans and Detailed Landscape Proposals. These detail the variety, species and locations together with densities, spacing and schedule of planting.

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.

Whilst the proposed mitigation for the long-term management and monitoring of the HSA and recreational greenspace is welcomed, the current submission does not contain sufficient information to enable a full assessment of impacts on the SAC. In order for the Local Planning Authority to complete an Appropriate Assessment with a favourable outcome, the information listed below must also be provided as part of the submitted documentation.

5.2. to submit annual Monitoring Reports to the Council on the first annual anniversary of the issue of the HSA Completion Certificate pursuant to the approved HSA Management Plan

- A mechanism should be secured to ensure that, upon completion of the initial five-year management period for the Habitat Suitability Area (HSA), the appointed management company undertakes a review of the management plan and considers any adaptive management measures required. The findings of this review, together with any proposed amendments to the management programme, should be presented to and agreed by the Management Committee/ Steering Group.

The revised Landscape and Ecological Management Plan (LEMP) and Habitat Management and Monitoring Plan (HMMP) now provide the requested five-year review and Steering Group approval mechanism.

Other notable amendments within the LEMP V4 include;

- Section 8.1.2 has been replaced with a formal review mechanism. This requires a review after the initial five-year management period, consideration of adaptive management measures, and agreement of any amendments by the Management Committee/Steering Group, including the Council's representative.
- The wording confirms that this review process will continue during the minimum 80-year management period, with management, maintenance and monitoring continuing

thereafter in perpetuity.

- Minor formatting and terminology corrections have also been made, including consistent capitalisation of Habitat Support Area.
- The inclusion of a 10-year recreational management schedule is welcomed. However, it is currently unclear who will be responsible for delivering and funding these measures in perpetuity following the transfer of management responsibilities at the end of the applicant's initial five-year management period. Further clarification is therefore required to demonstrate how the ongoing implementation of the recreational management measures will be secured in the longer term.

Within the signed s106 it states:

- To obtain approval for the HSA Plan (both Biodiversity Area and Recreational Area) and Management Scheme prior to development commencement.
- Provide HSA Bond Estimate together with associated details for the Councils approval.
- Not to allow first occupation until the HSA Completion Certificate has been issued to the Council.
- The owner to maintain the HSA for a period of 5 years from the Completion Certificate, prior to transfer to North Meadow National Nature Reserve team (NNR)/ Non Government Organisation (NGO) or Management Company.
- Inform the Council before the 5 year expiration of the Completion Certificate who will be responsible for the HSA moving forward.
- Submit annual monitoring reports to the Council on the first annual anniversary of the HSA Completion Certificate.

In addition, the implementation of the HSA habitat will be funded by the owner and transferred to the NNR, NGO or a Management Company for the remaining term.

In respect of who will be responsible beyond our stewardship, we are presently unable to answer this. Prior to this occurring we first need to gain consent for the HSA scheme (design, management and maintenance); implement said scheme in accordance with the approved documents; and manage the HSA for 5 years after successfully gaining a Completion Certificate.

The s106 does however include sufficient safeguard measures to ensure the HSA's maintenance, management, funding, and those tasked with its responsibility until the transfer is complete, it should therefore not be necessary to receive this information as part of the Reserved Matters or prevent the Habitat Regulation Assessment (HRA) and/or Appropriate Assessment from being completed.

In respect of the management and maintenance of land that is not privately conveyed, this will be funded in perpetuity by the future residents of the development and managed in accordance with the proposals submitted, via a Management Company.

- Whilst responsibility for monitoring the condition of the SAC rests with Natural England, it remains the developer's responsibility to monitor the effectiveness of the HSA as a mitigation measure and to demonstrate that it is contributing towards the conservation objectives of the SAC. To enable independent oversight of the mitigation, the Local Planning Authority will require an appropriate monitoring contribution. This will fund the review of annual monitoring reports, site inspections, attendance at Management Steering Group/Committee meetings, and the undertaking of periodic visitor surveys to assess whether the HSA is functioning effectively as alternative recreational greenspace for residents of the Stone Farm development. In order for the council to fulfil its monitoring responsibilities, a Habitat Suitability Area Monitoring Fee must be secured, this could be achieved via a deed of variation to the S106 with contributions secured prior to commencement. The monitoring fee has been calculated as £13,143 plus legal fees payable on commencement of development.

The signed Section 106 already defines a 'HSA Monitoring Fee' and requires it to be agreed with and paid to the Council before commencement. A deed of variation is therefore not necessary, although the Council should confirm its calculation of £13,143 and the basis for any legal fees.

"HSA Monitoring Fee"

means the Index Linked sum to be paid to the Council for the Council's cost in monitoring the delivery and maintenance of the HSA for the Maintenance Period such sum to be agreed in writing with the Council prior to the Commencement of Development and to be paid and to be paid in accordance with Clause 7.10 of this Deed

7.10. The Owner/Developer shall pay to the Council the HSA Monitoring Fee prior to Commencement of Development and it undertakes not to Commence the Development until such payment has been made in full

- The Habitat Management and Monitoring Plan (HMMP) currently states that management will be undertaken for a period of 30 years following habitat establishment. This is not considered sufficient and should be amended to reflect management in perpetuity. Whilst management prescriptions may require periodic review and adaptation over time, the document must clearly secure the long-term management, maintenance and monitoring of the HSA for a minimum period of 80 years following completion, in accordance with the requirements of the mitigation strategy.
The period covered by the HMMP has been amended from 30 years to a minimum of 80 years, with management, maintenance and monitoring continuing thereafter in perpetuity.

Other notable amendments within the LEMP V4 include;

- The pond and riparian buffer monitoring periods have similarly been amended from 30 years to a minimum of 80 years and thereafter in accordance with successive reviewed management plans.
- The same formal five-year review, adaptive management and Steering Group approval mechanism has been added to the Adaptive Management section.
- Newland Homes will be responsible for monitoring the site, appointing appropriate professionals (ecology, arboriculture) and producing the five-year monitoring report. Updates to the LEMP following the first five years of monitoring will be the responsibility of the appropriate party, following the successful transfer of the HSA Land.
- The document date and version number have been updated.

Discharge of Conditions

Condition 16 of the outline permission states that:

- 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.

Condition 17 of the outline permission states that:

- No development shall commence on site until a landscape and ecological management plan, including long-term design objectives, management responsibilities and maintenance schedules for all landscaped areas (except privately owned domestic gardens), shall be submitted to, and

approved in writing by, the local planning authority. The landscape and ecological management plan shall be carried out as approved, and any subsequent variations shall be agreed in writing by the local planning authority. The scheme shall include but not necessarily be limited to: • details of maintenance regimes • details of any new habitat created on site • details of treatment of site boundaries and/or buffers around water bodies • details of management responsibilities • details of any proposed planting schemes • a scheme for the provision and management of an 8 - metre-wide buffer zone alongside the River Thames including details of any proposed footpaths, fencing, lighting, etc

Once the additional information sought above is submitted, we will be able to provide further comment on the discharge of these conditions.

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, [as include on the updated HAS Landscape drawings and be fenced off from impacts of grazing and recreational disturbance which is welcomed.](#)

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.

Final sign off – all matters addressed:

Ecologist Jenna Buss	Date
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