

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jenna Buss
Date:	18/05/2026 24/08/2026 23/09/2026
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
x	No objection
	Condition (no objection subject to conditions)
	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).	YES 23/09/2026 LEMP. August 2026. Ethos

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

Additional information submitted September 2026:

- Landscape and Ecological Management Plan. August 2026. Ethos
- Habitat Management and Monitoring Plan. September 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.

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.
- Schedule 7 of the S106 parts 6,7 and 8 secure an annual fee from the applicant towards the cost of managing the HSA in perpetuity.
- In addition, the S106 secures a bond to be agreed between the applicant and Local Authority with Council 'step in' rights to ensure future management is undertaken within both the HSA biodiversity area and the Recreational Greenspace of the development.
- 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. Management 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. Additional information has been submitted to address our previous concerns outlined below. The application has potential to result in significant adverse impact either alone or in combination with other projects on the statutorily designated North Meadows and Clattinger Farm Special Area of Conservation. As required by the Conservation of Habitats and Species Regulations 2017 (as amended) an Appropriate Assessment has now been completed by the LPA with a favourable conclusion. The AA has been sent to Natural England and the application must not be determined until they have agreed with the LPAs conclusion.

In order for the Local Planning Authority to complete an Appropriate Assessment with a favourable outcome, the information listed below was requested and has been sufficiently addressed in the updated documents resubmitted to the LPA.

- 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.

Section 8 of the updated LEMP now addresses these concerns and a review of the management plan will be undertaken at the 5 year/handover stage.

- 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 long term.

Schedule 7 of the signed S106 secures monitoring of the recreational areas together with the HSA in perpetuity. Sections 6,7 and 8 secures an annual fee towards the cost of maintaining both the Recreational Greenspace and HSA areas to the agreed management company from the applicant.

- 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.

S106 secures a monitoring fee which is also stated below.

- 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 HMMP has been amended to ensure this is clear

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.

In order for the council to fulfil its monitoring obligations, the BNG monitoring fee would be £13,143 plus legal fees payable on commencement of development.

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.

The Local Planning Authority is satisfied that, subject to the development being carried out in accordance with the documents identified below, sufficient information has been submitted to demonstrate compliance with the requirements of this condition. The information submitted in support of this application includes:

- 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
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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

The Local Planning Authority is satisfied that, subject to the development being carried out in accordance with the documents identified below, sufficient information has been submitted to demonstrate compliance with the requirements of this condition. The information submitted in support of this application includes:

- HSA Landscape -Key Plan 2917-RDJWL-ZZ-DR-A-0001. July 2026. Robert Davies John West Ltd
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~~Once the additional information sought above is submitted, we will be able to provide further comment on d 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 included on the updated HSA 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.

CONDITIONS:

It is considered that the mitigation measures and management provisions secured through the outline permission, appeal decision and associated legal agreements are sufficient to ensure that the proposal would not adversely affect the integrity of North Meadow and Clattinger Farm SAC in view of its conservation objectives.

However, we would wish to be assured that the submitted documents to support this Reserved Matters Application were secured as part of this permission. Therefore, we suggest the following:

The development will be carried out in strict accordance with the following documents:

- 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
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REASON: For the avoidance of doubt and for the protection, mitigation and enhancement of biodiversity

Final sign off – all matters addressed:

Ecologist Jenna Buss	Date 24/09/2026
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