

7 October 2022

Delivered by email

Clerk to ES&BG Parish Council,
Ecchinswell Village Hall,
Ecchinswell
Newbury
RG20 4UB

Dear Sir/Madam

**ECCHINSWELL, SYDMONTON AND BISHOPS GREEN PRE SUBMISSION NEIGHBOURHOOD
DEVELOPMENT PLAN 2021-2039 - REGULATION 14 OF THE LOCALISM ACT 2011**

These representations are submitted on behalf of our client, Hathor Property. Hathor Property have an interest in land north of Bishops Green, identified as BGB within the draft Site Assessment Report submitted in support of the Regulation 14 Neighbourhood Plan (NP), and also EC004 within the Basingstoke and Deane Borough Council (BDBC) Strategic Housing and Employment Land Availability Assessment 2021 .

The site is currently the subject of a live outline planning application reference 22/00174/OUT currently being considered by BDBC. Amended plans have recently been submitted reducing both the density and overall development area of the site, so that the capacity is reduced to 42 dwellings.

In accordance with Paragraph: 065 Reference ID: 41-065-20140306 of national practice guidance (NPG), the NP is required to meet a series of basic conditions before it can be found sound. These include:

a. having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan);

d. the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development; and

e. the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area). Read more details.

For the reasons detailed below my client considers the extent of housing allocations identified, the allocation of the site at Rooksfield (NP reference BGI), and the identification of natural green spaces on

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the northern part of our client's site, do not confirm with these basic conditions. Whereas my client's submitted site (BGB) does.

POLICY ESBG2: HOUSING SUPPLY TO MEET LOCAL NEEDS

The NP identifies around 20-25 dwellings to be delivered on 2 sites (15 dwellings at Policy ESBG3 and 5 dwellings at ESBG4), with the remainder being made up through windfall schemes within the defined a Settlement Boundary.

It is acknowledged that, in the absence of an up-to-date Local Plan, the Parish Council (PC) were provided with an indicative figure of around 15 dwellings by BDBC to be incorporated within the Plan area (specifically Bishops Green), to meet housing needs of the Parish in accordance with paragraph 67 of the National Planning Policy Framework (NPPF).

There is considerable uncertainty with the overall housing provision and distribution within the emerging BDBC Local Plan. The decision has recently been taken to defer progress on the Local Plan whilst more evidence is sought on housing requirements and the appropriateness of using the Standard Method.

A committee report, Local Plan Update: Developing a Spatial Strategy – Rural Areas considered at the Economic Planning and Housing Committee in January 2022, provided an update on housing provision and distribution. This identified both Bishops Green and Echchinswell as Category 4 'small villages'. The report noted that it was important the strategy enabled '*villages to remain viable settlements, allowing them to grow to respond to local needs whilst retaining their individual identity and character*'

There was some final adjustment to reflect proportionality of growth relative to the size of settlements and relative proximity to key services and facilities. Whilst both Bishops Green and Echchinswell were considered to be suitably sustainable locations to meet the Category 4 settlement criteria, Bishops Green was provided a target of 15 dwellings, and Echchinswell none.

It is of note that the report acknowledges that the housing numbers identified will be subject to change as the plan progresses, and also that the provision of 945 dwellings to Tadley, because of the exclusion zone around the AWE, '*will be unlikely to be achievable although opportunities will continue to be considered and investigated as the Plan process continues*'.

This considerable uncertainty would indicate that progress on the NP may need to adapt to the changing context of the Local Plan in order to ensure it remains in general conformity. To avoid a scenario whereby the NP does not conform, or readily becomes out-of-date, some more flexibility in housing provision is recommended. Identifying potential sites to cater for more than 20 units is likely to provide the necessary flexibility.

Policy ESBG3 : Land south of Rooksfield and west of C155 Echchinswell Road

The draft Site Assessment Report (SAR) provides evidence to justify the allocation of the site on land south of Rooksfield for 15 dwellings. For the purposes of the SAR it is identified as site BGI. Both site BGI and BGB were considered for further assessment under stage 3 of the SAR, along with 5 other sites. It should be noted however that only the southern part of BGB was considered for assessment based on a reduced capacity.

Paragraphs 4.18 – 4.20 of the SAR references discussions with Hathor Property as to the inclusion of the site in the NP. Hathor Property submitted site BGB as identified in the SAR Appendix A to the Parish Council, with further communication with the Parish Council to confirm willing to consider reduced 15

units scheme on a without prejudice basis. The Parish Council confirmed this would only be considered if the planning application was withdrawn. Following Hathor Property confirming the application would not be withdrawn, the site was not included by the Parish Council.

Stage 3 of the SAR is based on two key stages:

- A strategic environmental assessment (SEA) of the technical attributes of the sites using a set of agreed environmental objectives as required by the Regulations; and
- an assessment of the opinions of the local community for each of the potential sites

With reference to the SEA, a summary table of how each site performs against key criteria of the SEA is included in the SAR at paragraph 4.6 (table extracted below). This determined the potential for likely significant and minor, positive, or adverse effects and neutral effects of development resulting from an allocation in the Plan.

This concludes that overall site BGB performs the best: no negative effects are identified, and a positive effect is concluded for 'transportation'. The SAR concludes this itself at paragraph 4.10. In contrast, site BGI scores negatively for both 'transportation' and 'landscape'. My client would agree with these technical assessments and the conclusions of the SEA.

	Bio/Geo diversity	Climate Change	Landscape	Historic Environment	Land, Soil & Water	Community wellbeing	Transportation
BGA	Red	Blue	Blue	Yellow	Blue	Blue	Green
BGB	Blue	Blue	Blue	Yellow	Blue	Blue	Green
BGF	Blue	Blue	Red	Yellow	Blue	Blue	Red
BGH	Blue	Blue	Yellow	Blue	Blue	Blue	Blue
BGI	Yellow	Blue	Red	Yellow	Blue	Blue	Red
EI	Yellow	Blue	Blue	Red	Blue	Blue	Red
EJ	Yellow	Blue	Blue	Red	Blue	Blue	Blue
EX	Yellow	Blue	Blue	Yellow	Blue	Blue	Blue
EZ	Blue	Blue	Blue	Red	Yellow	Blue	Blue
Likely positive effect	Green	Blue	Blue	Yellow	Blue	Blue	Red
Uncertain effect	Blue	Blue	Blue	Blue	Blue	Blue	Blue
Neutral/no effect	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow
Likely negative effect	Red	Red	Red	Red	Red	Red	Red

Extract from the SAR

In justifying the negative scoring for 'transportation' for site BGI, the SAR argues that the parish as a whole has 'very limited availability and utility of public transport', which is 'a significant contributor to the overall low sustainability of the area.'

This is somewhat disingenuous for the northern parts of Bishops Green, including site BGB. There is an hourly bus service to Newbury/Greenham Business Park Monday-Friday with a bus stop as far as Ash Road in Bishops Green. Bus stops are located adjacent to site BGB on Ecchinswell Road that access this service. Bus stops are also provided at 'Bishops Green Turn' adjacent to the A339/Ecchinswell Road/Albury Way roundabout some 670m north of the site BGB. The stops serve the Stagecoach Link hourly service between Basingstoke and Newbury which operates along the A339 Monday to Saturday.

Site BGB is also within 700m walking distance of Greenham Business Park north with footways along Ecchinswell Road providing access. This offers a wide range of business units, office space and workshops

as well as amenity uses and a children’s nursery. There is of course the convenience store, existing community centre and large play space immediately adjacent to the south. Footpath links to Harrier Road to the south of site BGB are proposed within the outline planning application, which if approved, would increase pedestrian connectivity to the site. The same could be incorporated into a scheme adopted for the NP.

Site BGI at Rooksfield is further distant from these bus stops and proximity to facilities, making it much less attractive for alternative modes of transport to the car. The differentiation in the SEA and SAR transportation scoring is considered reasonable and robust and should be a key consideration in justifying the NP allocations.

Site BGI at Rooksfield is located at the southern end of the Bishops Green village. At this point Ecchinswell Road is very narrow with no footways. It has a very rural character. The adjacent development at Rooksfield comprises single storey bungalows in very spacious low density plots. In landscape terms the site is also highly visible views of the site travelling north along Ecchinswell Road and east-west along Featherbed Lane. Indeed, the view north from Ecchinswell Road is identified as Key View 3N in the corresponding Key View report also submitted to support the NP.

A Design Guide has been prepared to support the identification of the allocation. This includes a sketch plan of the potential layout of the site at Fig 11. It includes an extensive area of planting to the south to mitigate landscape impacts. This reflects the sensitivity of the site within the landscape, and whilst it is accepted this will mitigate impacts to a degree, the related images of the massing and design of development will still be significantly visible within the landscape.

This impact will be compounded by the need for a new access from Ecchinswell Road. This will require provision of suitable visibility splays that will necessitate more hedgerow removal than is currently indicated on the Fig 11 sketch masterplan.

This contrasts with the well contained nature of Site BGB. There are localised landscape impacts from the immediate footpath to the north but existing trees and woodland to the west, east and south, combined with built form to the north, makes any wider appreciation of the site very limited. It is accepted that the assessment does not take into account the wider SHELAA site EC0004. However, the area immediately to the north has very similar well contained characteristics, apart from being on lower ground in landscape terms relative to site BGB, and therefore there is no reasons to suggest the conclusions of the SEA could not equally apply to the wider site.

Paragraphs 4.12 – 4.12 of the SAR references community input to the process. BGB (Woodside View) scored highest out of the sites for community preference in Bishops Green (38%), compared with 19% for BGI (the allocation):

Bishops Green	% of votes
BGA	5%
BGB	38%
BGF	11%
BGH	26%
BGI	19%
Ecchinswell	
EI	25%
EJ	21%
EX	53%

Extract from the SAR

The Parish Council state as follows (paragraph 4.14):

“The outcome of community consultation in respect of judging community preferences is that there are three sites in Bishops Green (BGB/BGH/BGI) and one in Ecchinswell (EX) that had a significantly higher preference than the others. A more detailed review of showed that among residents who gave their post code as being in the vicinity of Bishops Green, BGB was the least preferred of the 3.”

This is not a reasonable approach given the Neighbourhood Plan is supposed to be representative of the whole community.

A Sustainability Appraisal has also been prepared by Aecom to support the preparation of the Neighbourhood Plan. The report states (page 8) that *“The choice of site allocations has been informed by the findings of the site assessment undertaken for the ESBGNP, consultation events, other evidence base studies and the SA findings.”* On this basis, there is no evidence base that would support the allocation of any other site over BGB, based on that set out above regarding the SAR findings.

In addition, paragraph 4.4 of the Aecom report states:

“With regards to housing numbers, the housing requirement figure for Ecchinswell, Sydmonton and Bishops Green as stipulated within the Basingstoke and Deane Borough Council Local Plan Update is 15 dwellings. This number was derived from a sustainability formula in the spatial review that originally allocated 37 dwellings to the neighbourhood area; a ‘low sustainability settlement’ cut was applied to reduce this number to 15. It is recognised the ESBGNP will be submitted before the Basingstoke and Deane Borough Council Local Plan Update comes into play, and there is a possibility that the housing number will be revisited due to a potential redistribution of houses from other areas the local plan covers.”

POLICY ESBG12: GREEN INFRASTRUCTURE NETWORK & NATURE

Policy ESBG12 identifies a series of green infrastructure corridors. These are intended to promote nature recovery and mitigate climate change, and *‘encompass various areas of woodland, streams and hedgerows in the north of the parish to downland in the south.’*

Within the identified area, the Policy confirms that *‘Proposals that will lead to the loss of land lying within the Network and that will undermine its integrity will be resisted.’*

There are two green infrastructure networks that partially cover Site BGB : 5 – Bishops Green North (to the south of the site) and 6 – Enborne River (to the north). The areas identified are extensive, and cover much more than woodland, streams or hedgerows and the immediate areas adjacent. Whilst the principle of the policy is laudable, the definition of such wide corridor area is unnecessary to secure the benefits being sought (promote nature recovery and mitigate climate change), and the resistance to development that proposes the loss of land within corridors unjustified.

It should be noted that the green infrastructure 4- Bishops Green South includes the proposed allocation BGI site at Rooksfield. The allocation would therefore appear in conflict with Policy ESBG12. In addition, it is noted that the BGI site is also designated as a ‘Network Opportunity’ area.

The related requirement to provide a minimum of 10% net bio-diversity gain is not consistent with national policy. Under the Environment Act 2021, all planning permissions granted in England (with a few exemptions) will have to deliver at least 10% biodiversity net gain, but as yet from an unconfirmed date, expected to be in November 2023. Until such time as a date is confirmed then the policy should be amended to remove 'requirement' and replace with 'encouraged'.

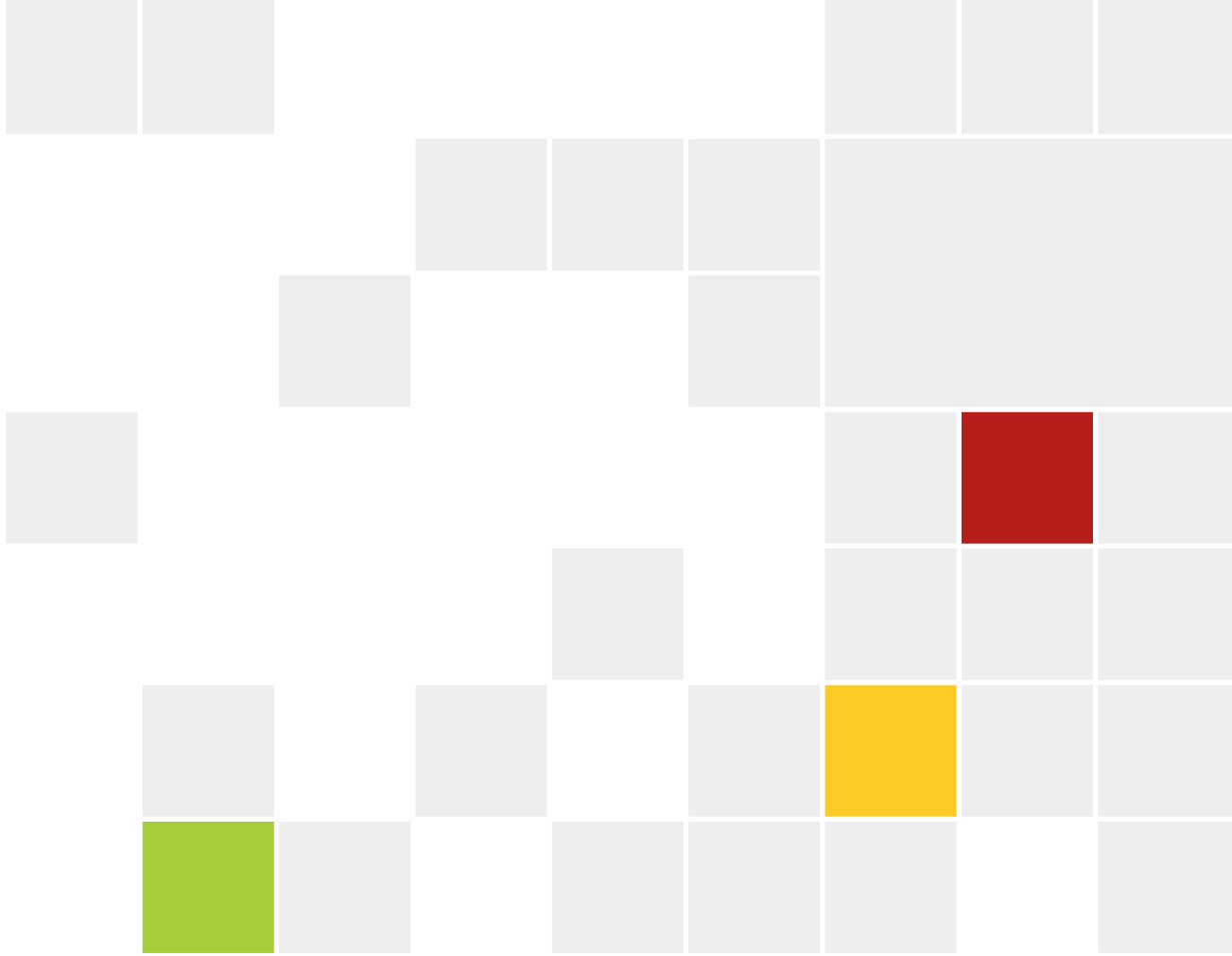
Based on the evidence base set out above, the reasoning for not including site BGB as a proposed allocation appears unreasonable and is likely to lead to the Neighbourhood Plan being unsupportable at examination.

We would welcome the above comments to be considered in due course. If you require any clarification please do not hesitate to contact us.

Yours sincerely

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Director

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Ecchinswell, Sydmonton and Bishops Green Neighbourhood Plan Consultation



Boyer

Report Control

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1. INTRODUCTION

Background and Scope of these Representations

- 1.1 This representation has been prepared on behalf of Sedas Strategic Land ('Sedas'), in response to the 'Ecchinswell, Sydmonton and Bishops Green Neighbourhood Plan ('the NP') Regulation 14 Consultation'. As prepared by Ecchinswell, Sydmonton and Bishops Green Parish Council and the Neighbourhood Plan Steering Group.
- 1.2 Sedas's interests relate to their ongoing promotion of 'Land at Bishops Green Farmhouse, Bishops Green' ('the site'), for a residential development, provided alongside green infrastructure, biodiversity enhancements and public open space. This site is identified in the Draft Site Assessment Report (August 2022) under reference 'BGF'.¹
- 1.3 A Location Plan is provided at **Appendix 1**, with an illustrative layout being included at **Appendix 2**. A Preliminary Ecological Appraisal is supplied at **Appendix 3**, whilst an Accessibility Technical Note is presented at **Appendix 4**.
- 1.4 Sedas welcomes the preparation of the NP and believes that the Plan could have a positive effect on planning within the Parish. Sedas also appreciates the opportunity to outline its observations on the draft document and the evidence base reports which accompany it.
- 1.5 Nonetheless, in its present form, it is our view that the draft NP does not meet the 'basic conditions', as identified in Paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990. We set out why this is the case in the following sections of this representation and set out how such issues could be remedied.
- 1.6 It should be noted that we have specifically sought to comment in respect of draft policies and approaches that are directly or indirectly pertinent to the promotion of Land at Bishops Green Farmhouse. However, we have also provided constructive suggestions in relation to other proposed policies, where we believe these will enhance the NP and facilitate its implementation as an effective development management tool.
- 1.7 Accordingly, the following sections of this representation are set out as follows:
 - Section 1 – Introduction
 - Section 2 – Legal and Policy Context
 - Section 3 – Land at Bishops Green Farmhouse
 - Section 4 – Response to the Draft Neighbourhood Plan
 - Section 5 – Summary and Conclusions
- 1.8 We trust that our comments are of assistance to the Neighbourhood Plan Steering Group and the Parish Council.

¹ The site is alternatively identified as ref. EC001, within the BDBC Strategic Housing Economic Land Availability Assessment (SHELAA).

2. LEGAL AND POLICY CONTEXT

Overview

- 2.1 The Planning Practice Guidance (PPG) sets out that neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood. They also provide an opportunity to shape the development and growth of their local area. The PPG explains this at Paragraph: 003 Reference ID: 41-003-20190509;

“Neighbourhood planning enables communities to play a much stronger role in shaping the areas in which they live and work and in supporting new development proposals. This is because unlike the parish, village or town plans that communities may have prepared, a neighbourhood plan forms part of the development plan and sits alongside the local plan prepared by the local planning authority. Decisions on planning applications will be made using both the local plan and the neighbourhood plan, and any other material considerations”.

- 2.2 Neighbourhood planning is therefore recognised as a mechanism that allows local people to plan for the types of development that will meet their community’s needs. However, the ambitions of a Neighbourhood Plan must also align with the strategic needs and priorities of the wider local area (as defined through adopted and emerging Local Plans, and the associated evidence base).

Basic Conditions

- 2.3 Once the Neighbourhood Plan is submitted for independent examination, it must be demonstrated that it conforms to the ‘basic conditions’ as identified in Paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990 (TCPA 1990). The Plan must also be legal in every other respect.
- 2.4 Following submission, it will be the role of an Independent Examiner to consider whether the draft Neighbourhood Plan meets the basic conditions. In order to meet the basic conditions, the making of the Neighbourhood Plan must:
- Be appropriate to do so, having regard to national policies and advice contained in guidance issued by the Secretary of State;
 - Contribute to the achievement of sustainable development;
 - Be in general conformity with the strategic policies of the development plan; and
 - Not breach, and must be otherwise compatible with, European Union (EU) and European Convention on Human Rights (ECHR) obligations.
- 2.5 In considering the submitted Neighbourhood Plan, the Independent Examiner will also be required to establish that the Plan:

- Has been prepared and submitted for examination by a qualifying body;
- Has been prepared for an area that has been properly designated;
- Includes development that is excluded development (it cannot);
- Relates to only one Neighbourhood Area; and
- Contains only policies that relate to the development and use of land.

2.6 Further guidance on each of the basic conditions is provided under the respective sub-headings below.

Regard to National Policy

2.7 A Neighbourhood Plan must have regard to the National Planning Policy Framework ('NPPF') and associated guidance. In this respect, NPPF Paragraph 13 states that:

"The application of the presumption [in favour of sustainable development] has implications for the way communities engage in neighbourhood planning. Neighbourhood plans should:

- *Support the delivery of strategic policies contained in local plans or spatial development strategies; and,*
- *Should shape and direct development that is outside of these strategic policies".*

2.8 NPPF Paragraph 29 further reiterates the need for Neighbourhood Plans to be aligned with the strategic needs and priorities of the wider local area. It states that: "...*Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies*". This is supported by NPPF footnote 16 which states: "*Neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area*".

2.9 Pursuant to this, the PPG (at Paragraph: 069 Reference ID: 41-069-20140306) further clarifies that 'regard to national policy' means that a "*Neighbourhood Plan or Order must not constrain the delivery of important national policy objectives*".

2.10 In addition, Neighbourhood Plans are also required to provide sufficient clarity to enable their policies to fulfil their intended development management role. Moreover, such policies must relate specifically to the unique circumstances of the neighbourhood area. This means that Neighbourhood Plan policies should not duplicate general Local Plan policies. These requirements are considered at the PPG Paragraph: 041; Reference ID: 41-041-20140306;

“A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.”

- 2.11 It is further specified that there has to be robust evidence to support particular policies, as may be proposed in a Neighbourhood Plan. It is not permissible to rely on conjecture or assertions. Nor is it sufficient (for example) to rely on a survey of local opinion, in order to suggest that a particular policy is justified because of the aspirations or concerns of the local community. In this regard the PPG, at paragraph 040 Reference ID: 41-040-20160211, states that;

“While there are prescribed documents that must be submitted with a neighbourhood plan or Order there is no ‘tick box’ list of evidence required for neighbourhood planning. Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan or the proposals in an Order...”

Contribution to the Achievement of Sustainable Development

- 2.12 All plan-making should contribute to and help to achieve sustainable development. Sustainable development is defined at NPPF paragraph 8. It encompasses three overarching objectives - environmental, economic and social;

“a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and

c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”

- 2.13 At NPPF paragraph 11, it is confirmed that all “Plans and decisions should apply a presumption in favour of sustainable development.” With it being added that;

“For plan-making this means that:

a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change”

2.14 Accordingly, Neighbourhood Plans should contribute to improvements to the three dimensions of sustainable development. If there are likely potential adverse effects as a result of the Plan, there should be measures in place that will reduce or offset these effects. This requirement is outlined in the PPG, at paragraph 072 Reference ID: 41-072-20190509 adds that;

“This basic condition [contributing to sustainable development] is consistent with the planning principle that all plan-making and decision-making should help to achieve sustainable development. A qualifying body should demonstrate how its plan or Order will contribute to improvements in environmental, economic and social conditions or that consideration has been given to how any potential adverse effects arising from the proposals may be prevented, reduced or offset (referred to as mitigation measures).

In order to demonstrate that a draft neighbourhood plan or Order contributes to sustainable development, sufficient and proportionate evidence should be presented on how the draft neighbourhood plan or Order guides development to sustainable solutions.”

Conformity with the Strategic Policies in the Development Plan of the Local Area

2.15 NPPF paragraph 13 is clear that Neighbourhood Plans should support the strategic development needs set out in Local Plans, including policies for housing and economic development. At footnote 16 and paragraph 29, the NPPF also states that Neighbourhood Plans should be in general conformity with the strategic policies of the Development Plan and that Neighbourhood Plans should plan positively to support them.

2.16 The Development Plan for the Neighbourhood Plan Area currently comprises the Basingstoke and Deane Local Plan (Local Plan), which was adopted in 2016 and which covers the period up to 2029. The Hampshire Minerals and Waste Plan (HMWP), which was adopted in 2013, also forms part of the relevant Development Plan for the area. The HMWP plan-period runs until 2030.

2.17 In addition, the Local Planning Authority (LPA), Basingstoke and Deane Borough Council (‘BDBC’), is also preparing a ‘Local Plan Update’, which will seek to guide development up to at least 2038. A Regulation 18 ‘Issues and Options’ consultation took place in 2020, and a further Regulation 18 Consultation had been expected to take place during the Autumn of 2022. However, this is now expected to be delayed until into 2023.

2.18 Nonetheless, the ‘Economic, Planning and Housing Committee’ (meeting on 2 September 2021 and again on 6 January 2022), considered a paper where Bishops Green was identified as a ‘Smaller Village’. This was based on analysis within the ‘Basingstoke and

Deane Settlement Study' (2020). The committee papers identified a proposed apportionment of 15 homes to the settlement.

- 2.19 The PPG is clear that a draft Neighbourhood Plan is not tested against the policies in an emerging Local Plan. It is therefore possible for the NP to proceed to referendum and be 'made' prior to the new Local Plan being adopted. However, the PPG at Paragraph: 009 Reference ID: 41-009-20190509 adds that;

...the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested. For example, up-to-date housing need evidence is relevant to the question of whether a housing supply policy in a neighbourhood plan or Order contributes to the achievement of sustainable development.

- 2.20 In considering the primary policy objective of achieving of sustainable development, it is also entirely possible (as indicated at PPG Paragraph: 103 Reference ID 41-103-20190509) for a Neighbourhood Plan to propose housing growth at a level exceeding the requirement identified by the LPA. This may well be a suitable approach, where the allocation of additional housing can create further social, economic or environmental benefits.

Compatibility with EU and Human Rights Regulations

- 2.21 Neighbourhood Plans must not breach and must be compatible with EU and human rights obligations, including the Strategic Environmental Assessment (SEA) Directive. The SEA is a procedure (set out in the Environmental Assessment of Plans and Programmes Regulations 2004) which requires the formal environmental assessment of certain plans and programmes which are likely to have significant effects on the environment.
- 2.22 It is further specified that Neighbourhood Plan areas which are in close proximity to (or that may lead to adverse effects on) a wildlife site that has been designated under the EU Habitats Directive, may also have to undertake a Habitats Regulation Assessment (HRA). A HRA is required to determine whether a plan or project would have significant adverse effects upon the integrity of internationally designated sites of nature conservation importance, or Natura 2000 sites. Undertaking a HRA screening will ensure that Neighbourhood Plans meet the requirements of the Directive and help to meet the Basic Condition to be in line with EU regulations.

3. LAND AT BISHOPS GREEN FARMHOUSE

- 3.1 As indicated, Sedas is promoting Land at Bishops Green Farmhouse (site BGF) for a sustainable, high-quality, landscape-led residential development.

Site Context and Characteristics

- 3.2 The site comprises a single parcel of agricultural land, located to the east of the current built extent of the settlement. The land is well contained by mature trees, hedgerows and vegetation, and benefits from clearly defined physical boundaries. Ecchinswell Road borders the site to the west, whilst Hyde Lane encloses the site to the east. To the north the promoted land borders Bishops Green Farmhouse.
- 3.3 An existing agricultural access to the site is located on Ecchinswell Road, to the west. The nearest bus stop is situated (on Ecchinswell Road) near the junction with Ash Road, around a 230m walk from the current site access. The stop is served by the No. 103 route, which provides access to Greenham Park and Newbury, and the employment opportunities and services available at these locations.
- 3.4 As confirmed in the accompanying Technical Note (**Appendix 3**), biodiversity interest is largely restricted to the site's boundary hedgerows and trees, whilst the main body of the land (having been in agricultural use) is not of significant ecological value. There are no Tree Preservation Orders (TPOs) on site, however an area of woodland (to the east of Hyde Lane) is identified by BDBC as a BAP Priority Habitat. Development at the site would need to provide an appropriate buffer towards this woodland.
- 3.5 Regarding landscape, the site is not within, nor in proximity to, the North Wessex Down Area of Outstanding Natural Beauty (AONB). The Basingstoke and Deane Landscape Character Assessment (May 2021) suggests that the site falls within the Ecchinswell Character Area. In terms of visibility, the site is largely screened from views along Ecchinswell, but is relatively more visible from Hyde Lane, owing to the gradient of the land. Boundary landscape enhancements would be required to reduce the effects of future development.
- 3.6 The site does not contain any Listed Buildings or Scheduled Ancient Monuments, nor is it located within or in the vicinity of a Conservation Area. Whilst archaeological surveys would need to be undertaken in support of any future planning application, a review of the Historic Environment Record did not highlight features of recorded archaeological interest within the local area. This suggests a low-probability of finds of historical interests being made at the site.
- 3.7 With respect to flood risk, the Environment Agency (EA) mapping confirms that the site lies wholly within Flood Zone 1. This confers the lowest risk of flooding from fluvial sources. In terms of surface water flooding, EA mapping further confirms that the site is free from surface water constraints, aside from a small area where the site adjoins Hyde Lane. This part of the site is envisaged for open space and green infrastructure.

The Proposed Development

- 3.8 The emerging site layout (at **Appendix 2**) indicates that the site is suitable for allocation and capable of accommodating approximately 27 dwellings, of which 11 (40%) would be expected to be affordable homes, in line with adopted planning policies. The dwellings would be provided predominantly as two storey dwellings, with a small number of flats (these will appear as houses, rather than blocks of apartments). To cater to local needs, the size of the properties ranges from 1 to 5-bedrooms.
- 3.9 A vehicular access is envisaged from Ecchinswell Road, which will meet the design requirements of the Local Highways Authority (LHA), Hampshire County Council (HCC). New sections of footway (on Ecchinswell Road) are proposed to allow for pedestrians to access the existing village via Eagle Road. A further pedestrian route is proposed at the north of the site to provide wider connectivity. All dwellings will include on-site parking, consistent with BDBC and HCC standards. Further details are provided in the Transport Technical Note (**Appendix 4**).
- 3.10 The proposed homes will be arranged in outward-facing perimeter blocks and are organised around a hierarchy of adoptable residential streets and secondary shared streets. Gardens will be generously sized and, where possible, parking bays are located to the side of the proposed homes, to reduce the presence of vehicles within the street scene. Surface water will be addressed through a Sustainable Urban Drainage System (SuDS), which will achieve 'greenfield run-off rates'.
- 3.11 The new homes would be provided alongside a Locally Equipped Area for Play (LEAP) or Local Area for Play (LAP), subject to advice from BDBC, together with a further area of public open space for walking and informal recreation. Boundary landscaping will be enhanced to reduce visual impacts and new planting will be provided throughout the development, to soften its appearance and to respond to the rural character of the area.
- 3.12 All existing landscape features will be retained, with removal being limited to where this is necessary to achieve a suitable vehicular access. Areas within the site will also be provided for biodiversity enhancements and enrichment. Green buffers are also envisaged towards the hedgerows and belts of mature trees that border parts of the site. This will help to both ensure the arboricultural health of existing specimens and create green corridors for new planting.
- 3.13 The new homes will be designed to contribute to zero-carbon objectives. Each property will be served by an electric vehicle charging point, will be highly thermally efficient and will generate renewable energy through the inclusion of photovoltaic panels on appropriately oriented roof spaces. Whilst the homes will be energy efficient, they will be built in a traditional vernacular, with their appearance being high-quality and consistent with the ES&BG Neighbourhood Plan Design Code.

- 3.14 It is recognised that the scale of development proposed at the site is greater than the apportionment to Bishops Green currently envisaged in the NP. The following section of this representation sets out why a more substantial apportionment to Bishops Green would be more effective at promoting sustainable development, as part of a modified NP strategy.
- 3.15 Notwithstanding these comments, Sedas wishes to clarify that it would be happy to revise the proposed housing mix, to ensure any scope for additional community benefits might be capable of being provided. This could include providing properties for older people / people with additional needs, such as bungalows, etc. Likewise, the dwellings provided could specifically include homeworking spaces, to help reduce commuting, as finds support in draft Policy ESGB9.
- 3.16 We would welcome the opportunity to discuss our approach with the Parish Council and on a 'without prejudice' basis to any decision to allocate the site or otherwise.

4. HOUSING POLICY COMMENTS

Settlement Boundaries (Draft Policy ESBG1)

- 4.1 Policy ESBG1 proposes to define settlement boundaries for both Bishops Green and Ecchinswell, these being the two main settlements within the Neighbourhood Plan Area. Sedas agrees with this approach, as the introduction of such boundaries provides clarity for residents and developers alike.
- 4.2 However, as we note below, we are concerned that the proposed allocation at Ecchinswell (as proposed in Policy ESBG3) would not actually be included in the new settlement boundary. In our view, this points to the unsuitability of 'Site EX' for the envisaged residential development.
- 4.3 As a separate matter, limb 'c' of this draft policy, which relates to the River Test catchment area and nitrate / nutrient neutrality, appears out of place. This is noting that it relates to the management of protected ecological interests, rather than settlement boundaries. Indeed, the area falling within the catchment does not actually contain any villages that are proposed to be enclosed within such boundaries.
- 4.4 If this policy is to remain in the NP, then it would perhaps be more logically included within Policy ESBG12, as this relates to green infrastructure and nature recovery. This said, it may be more appropriate to simply omit this policy from the NP, as Natural England, HCC and the relevant district and borough councils across Hampshire, are working to create a strategic approach to mitigation, which will be applied across a wide spatial area.
- 4.5 Therefore, it does not appear to be necessary to include a policy relating to nitrate neutrality within the NP.

Overall Housing Provision (Draft Policy ESBG2)

- 4.6 Whilst Sedas welcomes the fact that the NP seeks to allocate land for housing, several concerns are raised in respect of the overall amount of proposed housing. In this respect, Policy ESBG2 indicates that the NP seeks to provide 20 to 25 dwellings (across the NP Area), with it being explained in the supporting text that this is consistent with the figure identified by BDBC.
- 4.7 However, as set out at NPPF paragraphs 11 and 61, housing need / housing requirements are expressed as *minimum* figures, they are not a cap. This approach applies to the housing requirements identified in both the adopted BDBC Local Plan and the emerging Local Plan Update. Subsequently, any figure disaggregated down to a Neighbourhood Plan also only represents a minimum target (thereby ensuring general conformity with the strategic policies for the area, as per NPPF paragraph 29).
- 4.8 In this instance, there is a strong case for planning to exceed the minimum figures that BDBC has identified for the parish. As set out below, Sedas considers that the NP should

plan for the delivery of approximately 50 dwellings over the Plan-period. This will allow for a greater mix of housing to be provided and facilitate the delivery of more affordable homes. A more ambitious strategy is also more likely to prove effective at delivering wider infrastructure and community benefits. This is further explained below.

Housing Distribution Strategy (Draft Policy ESBG2)

- 4.9 In terms of meeting the identified housing requirement, draft Policy ESBG2 indicates that 5 homes are derived from assumed windfall provision, whilst a further 5 dwellings are to be delivered through a proposed allocation at Ecchinswell. The remaining 15 are to be provided through an allocation at Bishops Green.
- 4.10 We acknowledge that Catesby Estates is promoting land to the north and has submitted an outline planning application (ref. 21/03598/OUT) for some 350 dwellings. Clearly, the approval of this development would introduce a major (indeed, transformative) scale of growth at the settlement. However, based on a review of the consultee comments provided in respect of that application, it is far from clear that planning approval will be forthcoming.
- 4.11 Whilst much smaller by comparison, the outline planning application for up to 42 dwellings (Ref. 22/00174/OUT) on land to the north of Bishops Green, is similarly speculative. Again, noting the consultee comments, it is not certain that this application for development will be approved by the LPA. Putting aside the prospects of these applications, the NP's approach represents (in our opinion) a missed opportunity to maximise the socio-economic benefits that it could secure.
- 4.12 For example, the allocation envisaged at Draft Policy ESBG4 will result in a 5-dwelling development at Ecchinswell. However, this scale of the development is unlikely to trigger the threshold for the provision of affordable housing (1,000 sqm) and the mix of dwellings that will be provided will be inherently limited by the scheme's size.
- 4.13 The same will also be true of new dwellings that may be brought forward through 'windfall' applications. Whilst we do not dispute that such developments may provide a handful of new homes over the Plan-period, it should be recognised that windfall developments (particularly in rural settlements) typically concern proposals for a small number of larger houses. This source of supply is therefore less likely to provide homes that address local needs.
- 4.14 In view of this, we recommend that the proposed strategy for housing provision be revised. Specifically, the level of housing provision overall should be increased moderately to around 50 dwellings. This should be met through an additional allocation at Bishops Green and we maintain that Land at Bishops Green Farmhouse (site BGF) represents the most suitable available site for this purpose.
- 4.15 Were this change to be made, the two allocations at Bishops Green would still be of a scale that is proportionate and reasonable, relative to the size and sustainability of the settlement. Indeed, they would certainly be much smaller than the speculative planning applications described previously. So, there would be no major disbenefits or conflict regarding locational

sustainability.

- 4.16 Conversely, because development would be concentrated into two allocations at Bishops Green (each of meaningful scale), the NP could expect to achieve significant additional benefits. Two larger schemes (of around 25 dwellings each) will be better able to support a genuine mix of dwelling types and sizes. Likewise, such developments will facilitate an increased number of affordable homes and could more realistically provide plots for self-build dwellings, accommodation for meeting older peoples need and/or specialist accommodation for older people.
- 4.17 Focusing development at Bishops Green would also help to secure the transport enhancements that the NP seeks. For example, the request bus stop that the NP aspires to through Draft Policy ESBG3, is unlikely to be achieved via an allocation of only 15 dwellings. However, if sites BGI and BGF were allocated in conjunction (providing around 50 homes between them), then there would be potential to provide not just a request stop, but a physical bus shelter. This could be provided alongside additional enhancements on Ecchinswell Road, to improve the potential for safe pedestrian accessibility in this part of the settlement.

Sites Proposed for Allocation (Draft policies ESBG3 and ESBG4)

Draft Policy ESBG3 (Site Ref BGI - Land South of Rooksfield and West of C155 Ecchinswell Road).

- 4.18 With regard to Bishops Green, Land South of Rooksfield and West of C155 Ecchinswell Road, is proposed to be allocated for the delivery of 15 homes and an area of public open space. This proposed allocation has the advantage of being located in Bishops Green, a settlement that is less constrained than Ecchinswell and which has the potential to benefit from sustainability enhancements.
- 4.19 As the SEA and Site Assessment Report notes (at paragraphs 4.6 to 4.10, there is little to distinguish the overall suitability of site BGI when compared to nearby site BGF. Both are scored similarly in terms of prevailing constraints and each are recognised as being able to provide mitigation. Site BGF admittedly scores slightly lower in terms of biodiversity. However, this score is a result of the lack technical information. The accompanying Ecological Technical Note (**Appendix 3**) confirms the absence of ecological constraints
- 4.20 However, as indicated through our comments on the level of overall housing provision and the strategy for housing distribution, Sedas considers that there is a strong case for allocating both sites BGI and BGF. This would allow for a range of additional sustainability benefits to be secured, through a coordinated policy-led approach.

Draft Policy ESBG4 (Site Ref. EX - Clere Livery Stables)

- 4.21 In respect of Ecchinswell, the site proposed for allocation (at Draft Policy ESBG4) appears to have been selected (partly) on the basis that the site represents 'previously developed land'

(PDL). However, from the details presented in the NP and the evidence base documents, it is not clear if the site actually meets the definition of PDL, as set out at page 70 of the NPPF.

- 4.22 In any case, this particular site does not relate well to the existing settlement and is disconnected from the centre of the village. This is focused on/around the public house, and then the Village Hall and school further to the north. It is telling, that the site (when developed) would remain outside of the settlement boundary (as proposed to be created through Draft Policy ESGB1 and as set out at NP 'Policies Map Inset 3') and is located within the AONB.
- 4.23 Moreover, the road lacks an existing pedestrian footpath and there appears to be limited scope for enhancement. At paragraph's 5.38 to 5.42, the NP explains how a 'green path' can instead be provided within the field to the north. However, this would not extend far enough to provide a safe route into the village.
- 4.24 Taking account of these considerations, it is doubtful whether housing development at this location represents sustainable development, particularly when having regard to the requirements of NPPF paragraph 105, which seeks to direct development to locations that are, or which can be made, sustainable. Similarly, it is not clear that a future planning application would meet the tests outlined at NPPF paragraph 110 (which applies to decision-taking for proposals on both allocated and un-allocated sites). These require that;
- "a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location", and that,*
- "b) safe and suitable access to the site can be achieved for all users"*
- 4.25 Noting the above, it appears quite likely that the LHA would object should a planning application be brought forward at this site. This points to a lack of conformity with national planning policies and a conflict with the basic conditions test, set out in legislation.
- 4.26 Therefore, and in view of our previous comments regarding the opportunities provided by larger sites, the allocation currently envisaged at Draft Policy ESGB4 should be omitted from the NP. The residual housing numbers could then be reapportioned to Bishops Green, in order to allow for a more meaningful growth at that settlement, which has the added benefit of being less constrained in respect of heritage and landscape matters.

5. OTHER POLICY COMMENTS

Design Quality in the Parish (Policy ESBG5)

5.1 Sedas support this policy in principle and agrees broadly with the contents of the associated Design Code. However, it is important that the policy is not applied in an excessively ridged manner. We therefore suggest that the wording of the second limb of this policy omits the word 'fully'. Making this small change would ensure that development proposals would still have to accord with the Design Code, whilst leaving some flexibility for minor deviations, where this appropriate and reasonable.

5.2 The revised text would read as follows;

"the proposed development or redevelopment is ~~fully~~ aligned to the relevant design codes"

5.3 A separate concern, raised in respect of the Design Code, is that (at Part 8) it seeks to set out proscriptive energy efficiency / sustainability standards. Sedas supports the move to net zero carbon development and certainly recognises that this part of the Design Code is well intentioned. However, as detailed in our comments on Policy ESBG16, such matters are strategic in nature and should accordingly be addressed via the Local Plan Update to ensure, amongst all other development plan policy requirements, the impact upon development viability is given due regard.

Support For Home Working (Policy ESBG9)

5.4 This draft policy is supported and Sedas comment only insofar as to confirm that they would be happy to make provision for home working facilities, should Land at Bishops Green Farmhouse (BGF) be brought forward for development. This would be achieved (as appropriate) through the inclusion of study rooms within the dwellings, or through the inclusion of offices / flexible spaces within the rear garden of the properties.

Green Infrastructure Network and Nature Recovery (Policy ESBG12)

5.5 Sedas agrees with and supports this policy in-principle. Insofar as it relates to Land at Bishops Green Farmhouse (BGF), the Green Infrastructure Network Map (at NP page 52) identifies a green corridor on the southern boundary of the land, which appears to relate to the boundary hedgerow.

5.6 Should the site be brought forward for development, this hedgerow will be retained and there is scope to provide a green buffer towards this feature, which will include landscape and biodiversity enhancements. This is in addition to the buffer and enhancements that will be provided towards the nearby woodland, which lies to the east of the site.

- 5.7 Separately, the supporting text to the policy further identifies a shortfall of Accessible Natural Green Space (as defined in the adopted BDBC Local Plan). There is scope to provide assessable open space on Site BGF, within the framework of a holistic development that provides additional sustainability benefits.

Zero Carbon Buildings (Policy ESGB16)

- 5.8 As noted above, Sedas supports the net zero carbon agenda, and understands that changes to development and construction practices which are required to support this.
- 5.9 However, the stipulations of Policy ESGB16 are strategic in nature, as they set out environmental and design requirements that would be better applied consistently across the Borough, through the Local Plan Update. Indeed, in the interests of sound planning, sustainable design requirements should not be set at the level of the parish / Neighbourhood Area, given the complexity this would create for developers who must operate across a broader geography.
- 5.10 The Neighbourhood Plan-making process also provides limited scope for matters such as viability (as impacted by construction costs) to be fully considered, which is necessary in order to ensure compliance with the NPPF and general conformity with the strategic policies of the Development Plan. At this stage, neither the NP or the supporting evidence base appears to include a viability assessment.
- 5.11 In addition, draft Policy ESGB16 appears to conflict with the requirements of adopted Local Plan Policy EM10 (a strategic policy) and the Borough-wide Design and Sustainability SPD, which it directly references. The strategic nature of proposed Policy ESGB16 is further confirmed by the fact that it will be superseded by equivalent sustainability related policies in the emerging Local Plan Update.
- 5.12 As set out in the Planning Practice Guidance (PPG) (at paragraph 76 Reference ID: 41-076-20190509), it is not the role of a Neighbourhood Plan to create strategic policies. Accordingly, we recommend proposed Policy ESGB16 be omitted from the NP. However, if the policy is retained, it should be renamed 'Net Zero Carbon Buildings'. This amendment is needed, because as net zero development is what that policy wording and supporting text actually aspires to.

Encouraging Active and Sustainable Transport (Policy ESGB18)

- 5.13 Sedas agrees with the principle of this proposed policy, as it seeks to promote sustainable accessibility, safe mobility and travel planning, all of which contributes towards sustainable development. However, consistent with our comments in Section 4 of these representations, the NP's objectives in respect of Bishops Green would be better facilitated through a larger apportionment, delivered through the allocation of sites BGI and BGF.
- 5.14 Indeed, the 'Slow the Pace' areas identified on the proposed polices map, would benefit from the more substantive pedestrian infrastructure / traffic calming improvements on the relevant

section of Echinswell Road, that could be delivered through this approach. Likewise, as noted previously, the two allocations together are much more likely to secure a new covered bus shelter, than the current proposal for single allocation for 15 dwellings, at site BGI.

6. SUMMARY AND CONCLUSION

- 6.1 Sedas welcomes the preparation of a Neighbourhood Plan for the Parish of Ecchinswell, Sydmonton and Bishops Green, and recognises that neighbourhood planning can allow local communities to play a meaningful and positive role, in influencing development within their area.
- 6.2 As we have set out in these representations, there are many aspects of the draft NP that are of merit and which should be carried forward. However, Sedas considers that the NP should make provision for a greater number of homes than the 25 presently being considered. The housing apportionment, identified by BDBC, represents *only the minimum figure* and exceeding this requirement would bring additional sustainability benefits to the Parish and its community.
- 6.3 Sedas recommends that the Plan be modified, such that approximately 50 dwellings be apportioned to Bishops Green. This will allow for a greater mixture of market and affordable homes to be provided. Allocating both sites BGI and BGF also allow for more substantive infrastructure enhancements to be secured, not least a new bus stop at the southern extent of the settlement.
- 6.4 We have also provided comments on a number of the other proposed policies. In this regard, Sedas are concerned that some of the draft policies appear to be strategic in nature (therefore exceeding the permitted scope of a Neighbourhood Plan), or are otherwise not supported by sufficient evidence to confirm their effectiveness / feasibility. These policies should be revisited, to ensure the NP can meet the basic conditions test.
- 6.5 Additionally, these representations (in conjunction with the appended Technical Notes) have confirmed that site BGF (Land at Bishops Green Farmhouse) is free from any significant constraints that would inhibit its development for new homes, green infrastructure, biodiversity enhancement and public open space. It is therefore considered this site should be allocated, as part of a revised strategy for moderate housing growth.
- 6.6 Sedas would welcome the opportunity to discuss any of the matters raised in these representations with the Parish Council and/or Neighbourhood Plan Steering Group.

APPENDIX 1 – LOCATION PLAN



APPENDIX 2 – ILLUSTRATIVE LAYOUT



Accommodation Schedule

Affordable Dwellings		11no. - Req 10.8 Units	
2no.	1-Bedroom Flats	Flat Block	540sqft
1no.	2-Bedroom Flat	Flat Block	760sqft
3no.	2-Bedroom Houses	Semi-Detached	850sqft
4no.	3-Bedroom Houses	Semi-Detached	1005sqft
1no.	4-Bedroom House	Semi-Detached	1200sqft
Open Market Dwellings		16no.	
2no.	2-Bedroom Houses	Semi-Detached	950sqft
2no.	3-Bedroom Houses	Detached	1250sqft
4no.	3/4-Bedroom Houses	Detached	1350sqft
4no.	4-Bedroom Houses	Detached	1500sqft
4no.	4/5-Bedroom Houses	Detached	2000sqft
Total: 27 Dwellings		[1.89 Ha approx. to Red Line - 14.3 Dw/Ha]	
Car Parking:		1 space per 1-Bedroom Affordable Flat 2 spaces per 2 / 3-Bedroom Affordable Flat / House 3-4 spaces per 2, 3 & 4-Bedroom Open Market House (including garages and car bays) 12 visitor spaces at circa. 1 per 2.25 dwellings	

Rev	Date	Revision Details	AK	AK
A	03.10.22	Updated to Client Comments		
			Dr	Ch

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Client's Name
Sedas Strategic Land

Job Title
Land at Bishop's Green Farmhouse, Ecchinswell Road, Bishops Green

Drawing Title
Feasibility Site Plan

Scale
1:500 @ A1 / 1:1000 @ A3

Drawn	Checked	Date
AK	KE	16.09.22

Job No	Drawing No	Rev
MP/SSL/BG	SK-02	A

Status
PRELIMINARY

APPENDIX 3 – PRELIMINARY ECOLOGICAL APPRAISAL



Preliminary Ecological Appraisal

Bishops Green Farm House, Bishops Green, Newbury, RG20 4JP.

Status	Issue	Name	Date
Draft	1	Matthew Game BSc (Hons) ACIEEM REnvP	28/09/2022
Reviewed	1.1	Lizi Pimlott BSc (Hons) MSc MCIEEM MRSB, Principal Ecologist	01/10/2022
Final	2	Matthew Game BSc (Hons) ACIEEM REnvP	05/10/2022

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Industry Guidelines and Standards

This report has been written with due consideration to:

- Chartered Institute of Ecology and Environmental Management (2017). Guidelines for Preliminary Ecological Appraisal. 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2018). Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine. Version 1.1. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2017). Guidelines on Ecological Report Writing. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2020). Guidelines for Accessing, Using and Sharing Biodiversity Data in the UK. 2nd Edition. Chartered Institute of Ecology and Environmental Management, Winchester.
- British Standard 42020 (2013). Biodiversity – Code of Practice for Planning and Development.
- British Standard 8683:2021 (2021). Process for Designing and Implementing Biodiversity Net Gain.

Proportionality

The work involved in preparing and implementing all ecological surveys, impact assessments and measures for avoidance, mitigation, compensation and enhancement should be proportionate to the predicted degree of risk to biodiversity and to the nature and scale of the proposed development. Consequently, the decision-maker should only request supporting information and conservation measures that are relevant, necessary and material to the application in question. Similarly, the decision-maker and their consultees should ensure that any comments and advice made over an application are also proportionate.

This approach is enshrined in Government planning guidance, for example, paragraph 174 of the National Planning Policy Framework for England.

The desk studies and field surveys undertaken to provide a Preliminary Ecological Appraisal (PEA) might in some cases be all that is necessary.

(BS 42020, 2013)

Executive Summary

Arbtech Consulting Limited was instructed to undertake a Preliminary Ecological Appraisal (PEA) at Bishops Green Farm House, Bishops Green, Newbury, RG20 4JP. (hereafter referred to as “the site”). The survey was required to inform a planning application for the redevelopment of the site, including the construction of new dwellings and the creation of a new access point (hereafter referred to as “the proposed development”).

The following is work you will need to commission to obtain planning permission and to comply with legislation. Further information, along with opportunities for biodiversity enhancement, are outlined in Table 6 of this report.

Feature	Foreseen impacts	Recommendations <i>Measures required to adhere to guidance, legislation and planning policies.</i>
Habitats and flora	No direct impacts to any notable habitats will occur as a result of the proposed development as only grassland and a very small amount of the boundary hedgerow will be affected by the proposed development. However, due to the proximity of the site to lines of trees, indirect effects such as pollution or tree damage could occur during construction.	Best practice measures to minimise the possibility of pollution and tree damage must be implemented during construction.
Foraging and commuting bats	The proposed development will not result in the removal of any habitats which could be used by foraging or commuting bats. The proposed development could include the use of lighting which could spill on to bat roosting, foraging or commuting habitat and deter bats from using these areas.	A low-impact lighting strategy should be implemented.

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1.0 Introduction and Context

1.1 Background

Arbtech Consulting Limited was instructed to undertake a Preliminary Ecological Appraisal (PEA) at Bishops Green Farm House, Bishops Green, Newbury, RG20 4JP (hereafter referred to as “the site”). The survey was required to inform a planning application for redevelopment of the site, including the construction of new dwellings and the creation of a new access point (hereafter referred to as “the proposed development”). A plan showing the proposed development is provided in Appendix 1.

The aim of the PEA was to obtain data on existing ecological conditions, and to conduct a preliminary assessment of the likely significance of ecological impacts on the proposed development.

1.2 Site Context

The site is located at National Grid Reference SU 50179 62780 and has an area of approximately 1.7ha. The site consists of a grazing field. The site is located rurally and the local area is dominated by arable fields, with Newbury extending to the north.

A site location plan is provided in Appendix 2.

1.3 Scope of the Report

The PEA describes the baseline ecological conditions at the site, evaluates habitats within the survey area in the context of the wider environment and describes the suitability of those habitats for notable or protected species. It identifies possible ecological constraints as a result of the proposed development and summarises the requirements for further surveys and mitigation measures to inform subsequent mitigation proposals, achieve planning or other statutory consent and to comply with wildlife legislation.

To achieve this, the following steps have been taken:

- A desk study has been carried out.
- A field survey has been undertaken to record baseline information on the site and surrounding area including habitat types and their suitability for notable or protected species, including roosting bats.
- Invasive plant and animal species (such as those listed on Schedule 9 of the Wildlife & Countryside Act) have been identified.
- Potential impacts on features of value, as a result of the proposed development, have been identified.
- Recommendations for further surveys and mitigation have been made.
- Opportunities for the enhancement of the site for biodiversity have been set out.

2.0 Methodology

2.1 Desk Study

The desk study included a 2km radius review of statutory designated sites and notable habitats as well as a 2km radius review of granted European Protected Species Licence (EPSL) and notable species records held on magic.gov.uk database. An assessment of the surrounding landscape structure was also completed using aerial images from Google Earth and OS maps.

2.2 Field Survey

The survey was undertaken by Matthew Game (Accredited Agent on Natural England Bat Licence Number: 2018-15716-CLS-CLS) on the 21st of September 2022.

Preliminary Ecological Appraisal

An extended habitat survey was undertaken, following the methodology set out in UK Habitat Classification User Manual (UK Habitat Classification Working Group, 2018). All land parcels are described and mapped and, where appropriate, target notes provide supplementary information on habitat conditions, features too small to map to scale, species composition, structure and management. Botanical species lists were compiled with reference to the DAFOR scale (D = Dominant; A = Abundant, F = Frequent, O = Occasional, R = Rare).

During the survey, habitats were assessed for their suitability to support protected species, and field signs indicating their presence recorded. The assessment takes into consideration the findings of the desk study, the habitat conditions on site and in the context of the surrounding landscape, and the ecology of the protected species.

2.3 Limitations

It should be noted that whilst every effort has been made to describe the baseline conditions within the survey area, and evaluate these features, this report does not provide a complete characterisation of the site. This assessment provides a preliminary view of the likelihood of protected species being present. This is based on suitability of the habitats on the site and in the wider landscape, the ecology and biology of species as currently understood.

A biological records data search has not been undertaken. However, given the location of the site, the nature of the habitats present and the assessed suitability of the site for protected or notable species, it is not anticipated that the purchase of biological records data will add any significant weight or alter the conclusions and recommendations outlined in this report.

These limitations have been taken into account during the evaluation of the site and requirement for further surveys and mitigation. There were no other specific limitations to the report.

3.0 Results and Evaluation

3.1 Desk Study Results

A summary of desk study results is provided below.

Designated Sites

Details of any statutory designated sites within a 2km radius of the site, including their reasons for notification, are provided in Table 1 below. The site sits within the impact risk zone for Greenham and Crookham Commons Site of Special Scientific Interest (SSSI). The proposed development is listed as a possible high risk with regard to this designation.

Table 1: Statutory designated sites within 2km radius of the site

Designated site name	Distance from site (approx.)	Reasons for notification from Natural England
Greenham and Crookham Commons SSSI	800 metres north	This site comprises of an extensive complex of heathland, grassland, gorse scrub, broad leaved woodland and alder-lined gullies.

Landscape

A review of aerial photographs (Google Earth) the magic.gov.uk database and OS maps has been undertaken. Collated together, the value of the landscape in terms of biodiversity is described below:

The site consists of a grazing field. The site is located rurally and the local area is dominated by arable fields, with Newbury extending to the north.

There are scattered woodland copses and tree lines around the area, which could be used by wildlife for shelter, foraging and commuting.

Notable Habitats

Notable habitats within 2km are listed in Table 2.

Table 2: Notable habitats within 2km of the site

Habitat	Closest distance from site (approx.)
Deciduous woodland	60 metres south
Good quality semi-improved grassland	270 metres east
Traditional Orchard	560 metres northeast
Woodpasture and parkland	590 metres south

3.2 Field Survey Results

The results of the field survey are illustrated in Appendix 3. The weather conditions recorded at the time of the survey are shown in Table 3.

Table 3: Weather conditions during the survey

Date: 21/09/2022	
Temperature	20°C
Humidity	72%
Cloud Cover	40%
Wind	7mph
Rain	None



Habitats and Flora



The following habitats are present within the site:

- Line of trees – w1g6
- Other hedgerow – h2b
- Neutral grassland – g3
- Mixed scrub – h3h

A description and photograph of each habitat is provided in Table 4. No protected or non-native invasive plant species were identified on the site.

Table 4: Description and photographs of habitats within and adjacent to the site

Habitat Type	Habitat description	Photograph
Line of trees – w1g6	<p>There are lines of trees on the western boundary. Species composition is mostly early mature silver birch, with some hawthorn, oak and ash. This habitat is of moderate ecological value.</p>	
Other hedgerow – h2b	<p>On the southern boundary of the site is a low hedgerow, comprising hazel, blackthorn and some hawthorn. This is of moderate ecological value.</p>	

<p>Neutral grassland – g3</p>	<p>The majority of the site is neutral grassland. It is mown creating a sward height of approx. 5-8cm. Species composition is poor, comprising predominantly perennial ryegrass (D) and meadow grass species (F) with occasional broad-leaved herbs such as curled dock (O) and dandelion (O).</p>	
<p>Mixed scrub – h3h</p>	<p>In scattered areas across the site are areas of mixed scrub. This comprises of mostly bramble, with some nettle and ruderal grasses in places. This offers low ecological value.</p>	

Fauna

An assessment of the suitability of the site for protected or notable species is provided in Table 5.

Table 5: Assessment of the suitability of the site for protected or notable species

Species	Assessment of suitability																														
Amphibians	<p>A review of the MAGIC database returned two granted EPSL records for great crested newts within 2km of the site. However, these are over 1.5km away from the site boundary.</p> <p>Great crested newts exist in metapopulations and are known to utilise ponds and their connecting terrestrial habitat during their life cycle; great crested newts are typically found within terrestrial habitats up to 500m from breeding ponds (Langton <i>et al.</i> 2001). No ponds are present within 500 metres. There is low value terrestrial habitat available on site, in the form of mixed scrub. Connectivity is available via grassland and adjacent hedgerows / tree lines.</p>																														
Bats	<p>A review of the MAGIC database returned five granted EPSL records within 2km of the site, as detailed in Table 5a below.</p> <p><i>Table 5a: Bat EPSL records within 2km</i></p> <table border="1"> <thead> <tr> <th style="background-color: #d9ead3;">EPSL reference</th> <th style="background-color: #d9ead3;">Approx. distance from site</th> <th style="background-color: #d9ead3;">Bat species affected</th> <th style="background-color: #d9ead3;">Licence start date:</th> <th style="background-color: #d9ead3;">Licence end date:</th> <th style="background-color: #d9ead3;">Impacts allowed by licence</th> </tr> </thead> <tbody> <tr> <td>EPSM2009-1209</td> <td>370 metres northwest</td> <td>Common pipistrelle</td> <td>03/11/2009</td> <td>31/12/2010</td> <td>Destruction of a resting place Destruction of a breeding site</td> </tr> <tr> <td>2017-29678-EPS-MIT</td> <td>820 metres northeast</td> <td>Common Pipistrelle and Brown Long-Eared</td> <td>27/06/2017</td> <td>08/06/2022</td> <td>Destruction of a resting place</td> </tr> <tr> <td>EPSM2012-4649</td> <td>830 metres north</td> <td>Common Pipistrelle and Brown Long-Eared</td> <td>11/11/2013</td> <td>31/08/2015</td> <td>Destruction of a resting place</td> </tr> <tr> <td>2014-5006-EPS-MIT</td> <td>830 metres south</td> <td>Natterers, Brown Long-Eared and Common Pipistrelle</td> <td>24/01/2015</td> <td>30/06/2020</td> <td>Destruction of a resting place</td> </tr> </tbody> </table>	EPSL reference	Approx. distance from site	Bat species affected	Licence start date:	Licence end date:	Impacts allowed by licence	EPSM2009-1209	370 metres northwest	Common pipistrelle	03/11/2009	31/12/2010	Destruction of a resting place Destruction of a breeding site	2017-29678-EPS-MIT	820 metres northeast	Common Pipistrelle and Brown Long-Eared	27/06/2017	08/06/2022	Destruction of a resting place	EPSM2012-4649	830 metres north	Common Pipistrelle and Brown Long-Eared	11/11/2013	31/08/2015	Destruction of a resting place	2014-5006-EPS-MIT	830 metres south	Natterers, Brown Long-Eared and Common Pipistrelle	24/01/2015	30/06/2020	Destruction of a resting place
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2014-5006-EPS-MIT	830 metres south	Natterers, Brown Long-Eared and Common Pipistrelle	24/01/2015	30/06/2020	Destruction of a resting place																										

	2016-19353-EPS-MIT	1460 metres southwest	Brown Long-Eared, Common Pipistrelle, Daubentons, Natterers and Soprano Pipistrelle	08/02/2016	07/02/2021	Destruction of a breeding site Destruction of a resting place
<p>The lines of trees within the site itself, as well as adjacent to the site provide foraging and commuting habitat for bats, as well as some roosting opportunities within mature trees, however the proposed development has no effect on these habitats.</p>						
Reptiles	<p>The majority of the boundaries of the site are suitable for sheltering and commuting reptiles, with natural refugia available. There is connectivity available, but with the regularly mown nature of the grassland it is unlikely that reptiles are present within the area of the site that will be affected by the proposed development.</p>					
Badgers	<p>There are no known setts within 30 metres of the site boundary. No signs of badger were found during the field survey. The site offers minimal opportunities for sett creation and is isolated within a stock fence. Badgers are unlikely to be present.</p>					
Hazel Dormouse	<p>A review of the MAGIC database returned no granted EPSL records for dormice within 2km of the site. Habitats recorded within the site are assessed to provide foraging, commuting, and nest building opportunities for dormouse in the form of woodland and scrub. Dormice typically utilise a three-dimensional habitat structure as to commute between feeding and breeding sites whilst avoiding predation; woodland adjacent to the site supports this habitat structure. Furthermore, for isolated habitats in the UK, research indicates that dormice require 20ha of woodland habitat to support a viable population (Bright et al. 1994). 20ha of woodland is not present on or directly adjacent to the site, with no connectivity to this size of woodland present.</p>					
Hedgehog	<p>The site potentially could be used by small mammals such as hedgehog – a species of principal importance under section 41 of the NERC Act 2006. Hedgehogs are likely to be present due to the nature of the habitats available.</p>					
Otter	<p>No suitable habitat is present on or adjacent to the site.</p>					

Water Vole	No suitable habitat is present on or adjacent to the site.
Birds	The lines of trees within the site boundary and adjacent to site could support nesting birds.
Invertebrates	The site has low value habitat for invertebrates within the areas of trees.

4.0 Conclusions, Impacts and Recommendations

4.1 Informative Guidelines

A summary of the relevant legislation and planning policies is provided in Appendix 4.

Likelihood of the Presence of Protected Species

Where physical evidence of the presence of protected species is indeterminate during the survey, the habitats on site are evaluated as to their likelihood to provide sheltering, roosting, foraging, basking or nesting habitat.

Where this report supports a planning application, the ecological interest of the study area (i.e., the area covered by the desk study and field survey) and the proposed development has also been evaluated in terms of the planning policies relating to biodiversity.

4.2 Evaluation

Taking the desk study and field survey results into account, Table 6 presents an evaluation of the ecological value of the site and also details any ecological constraints identified in relation to the proposed development.

Table 6: Evaluation of the site and any ecological constraints

Ref	Summary of Survey Findings	Foreseen Impacts	Recommendations <i>Measures required to adhere to guidance, legislation and planning policies.</i>	Biodiversity Enhancements <i>The Local Planning Authority has a duty to ask for enhancements under the NPPF (2021)</i>
Designated sites	The site is not subject to any statutory or non-statutory designation. There is one statutory site within 2km of the site, being Greenham and Crookham Commons SSSI located 800 metres from the site.	No impacts to designated sites are anticipated due to the small scale and distance of the proposed development from such sites (where known) as well as the urban location of the site with surrounding physical barriers.	None	None

<p>Habitats and flora</p>	<p>The site contains line of trees and hedgerows which are of good quality and could be of value to local wildlife populations (as detailed in subsequent sections of this table). The remaining habitats have low ecological value.</p> <p>No protected or notable plant species were recorded during the survey.</p>	<p>No direct impacts to any notable habitats will occur as a result of the proposed development as only grassland and a very small amount of the boundary hedgerow will be affected by the new access for the proposed development. However, due to the proximity of the site to lines of trees, indirect effects such as pollution or tree damage could occur during construction.</p>	<p>Best practice measures to minimise the possibility of pollution and tree damage must be implemented during construction.</p>	<p>The following habitat creation and enhancement opportunities could be incorporated into the proposed development:</p> <ul style="list-style-type: none"> • Native tree, hedgerow and shrub planting. • Creation of wildflower grassland. • A green roof on new buildings. <p>Species-specific enhancement opportunities are detailed later in this table.</p>
<p>Amphibians</p>	<p>There is low value terrestrial habitat available on site, in the form of mixed scrub. Connectivity is available via grassland and adjacent hedgerows / tree lines.</p>	<p>No impacts are anticipated on amphibians, including great crested newt, as a result of the proposed development.</p>	<p>None</p>	<p>The following habitat creation and enhancement opportunities could be incorporated into the proposed development which would be beneficial for amphibians:</p> <ul style="list-style-type: none"> • Creation of amphibian refugia and hibernacula using debris and brash from site clearance. • Planting of native scrub and grassland to increase foraging opportunities.

<p>Reptiles</p>	<p>Negligible habitat value is available on site due to the regular mowing of the site. The boundary habitats consisting of hedgerows and lines of trees are suitable but will not be affected by the proposed development.</p>	<p>No impacts are anticipated on reptiles as a result of the proposed development.</p>	<p>None.</p>	<p>The following habitat creation and enhancement opportunities could be incorporated into the proposed development which would be beneficial for reptiles:</p> <ul style="list-style-type: none"> • Creation of reptile refugia and hibernacula using debris and brash from site clearance. • Planting of native scrub and grassland to increase foraging opportunities. • The creation of basking areas such as rock piles or areas of cleared ground with shelter nearby.
<p>Roosting bats</p>	<p>The trees within the site have low/moderate value for roosting bats. Several mature trees that are of an age where potential roosting features may be present are available on site.</p>	<p>Trees are to be retained on site, and as such no impacts to roosting bats are envisaged.</p>	<p>None.</p>	<p>The installation of a minimum of two bat boxes on mature trees around the site boundaries or on retained buildings will provide additional roosting habitat for bats e.g.</p> <p>2F Schwegler Bat Box (trees) 1FF Schwegler Bat Box (trees) 2FN Schwegler Bat Box (trees) Beaumaris Bat Box (buildings) Vivara Pro Woodstone Bat Box (buildings) Or a similar alternative brand.</p> <p>Bat boxes should be positioned 3-5m above ground level facing in a south or south-westerly direction with a clear flight path to and from the entrance, away from artificial light.</p>

				<p>Alternatively, bat boxes could be incorporated into new buildings on the site e.g. Habibat Bat Box Schwegler 1FR Bat Tubes Bat tubes should be inserted into the fabric of the building during construction, positioned 3-5m above ground level facing in a south or south-westerly direction with a clear flight path to and from the entrance and facing landscapes areas, away from artificial light.</p>
Foraging and commuting bats	<p>Trees could be used by local bat populations for foraging or commuting. These could also be used by bats dispersing from nearby roosts outside of the site.</p>	<p>The proposed development will not result in the removal of any habitats which could be used by foraging or commuting bats.</p> <p>The proposed development could include the use of lighting which could spill on to bat roosting, foraging or commuting habitat and deter bats from using these areas.</p>	<p>A low impact lighting strategy will be adopted for the site during and post-development, which will include the following measures:</p> <ul style="list-style-type: none"> • Use narrow spectrum light sources to lower the range of species affected by lighting. • Use light sources that emit minimal ultra-violet light. • Avoid white and blue wavelengths of the light spectrum to reduce insect attraction and where white light sources are required in order to manage the blue shortwave length content they should be of a warm / neutral colour temperature <4,200 kelvin. • Not use bare bulbs and any light pointing upwards. The spread of light will be kept in line with or below the horizontal. <p>Light spill will be reduced via the use of low-level lighting used in conjunction with hoods, cowls, louvers and shields. Lights will also be directional to ensure that light is directed to the intended areas only.</p>	<p>The following habitat creation and enhancement opportunities could be incorporated into the proposed development which would be beneficial for foraging bats:</p> <ul style="list-style-type: none"> • Planting of native tree, shrub and hedgerows to increase foraging opportunities.

Badger	No signs of badger on the site survey so species likely to be absent.	No impacts are anticipated on badgers as a result of the proposed development.	None	None
Hazel dormouse	No suitable habitat or connectivity available on or adjacent to site, species likely to be absent.	No impacts are anticipated on hazel dormouse as a result of the proposed development, as trees are being retained.	None	None
Hedgehog	Potential for hedgehog habitat.	No impacts are anticipated on hedgehogs as a result of the proposed development, as trees are being retained.	None.	None
Otter and water vole	No suitable habitat or connectivity available on or adjacent to site, species likely to be absent	No impacts are anticipated on otters or water vole as a result of the proposed development.	None.	None
Birds	The trees on the site present opportunities for nesting birds.	The proposed development will retain trees, as such no impacts are anticipated on nesting birds.	None.	The installation of a minimum of two bird boxes on mature trees around the site boundaries or on retained buildings will provide additional nesting habitat for birds e.g. Schwegler No 17 Swift Nest Box (buildings) Schwegler 1SP Sparrow Terrace (buildings) Schwegler 1B Nest Boxes (trees) Schwegler 2H Robin Boxes (trees) Woodstone Nest Box (buildings or trees) Or a similar alternative brand. Tree boxes should be positioned approximately 3m above ground level where they will be sheltered from prevailing wind, rain and strong sunlight. Small-hole boxes are best placed approximately 1-

				<p>3m above ground on an area of the tree trunk where foliage will not obscure the entrance hole.</p> <p>Swift and sparrow boxes should be positioned at the eaves of a building and can be incorporated into the fabric of the building during construction.</p>
Invertebrates	The site is low-value habitat for invertebrates.	No impacts are anticipated on notable species or populations of invertebrates as a result of the proposed development.	None.	<p>The following habitat creation and enhancement opportunities could be incorporated into the proposed development which would be beneficial for invertebrates:</p> <ul style="list-style-type: none"> • Native tree, hedgerow and shrub planting. • Creation of wildflower grassland. • A green roof on new buildings. • Retention of deadwood on the site.

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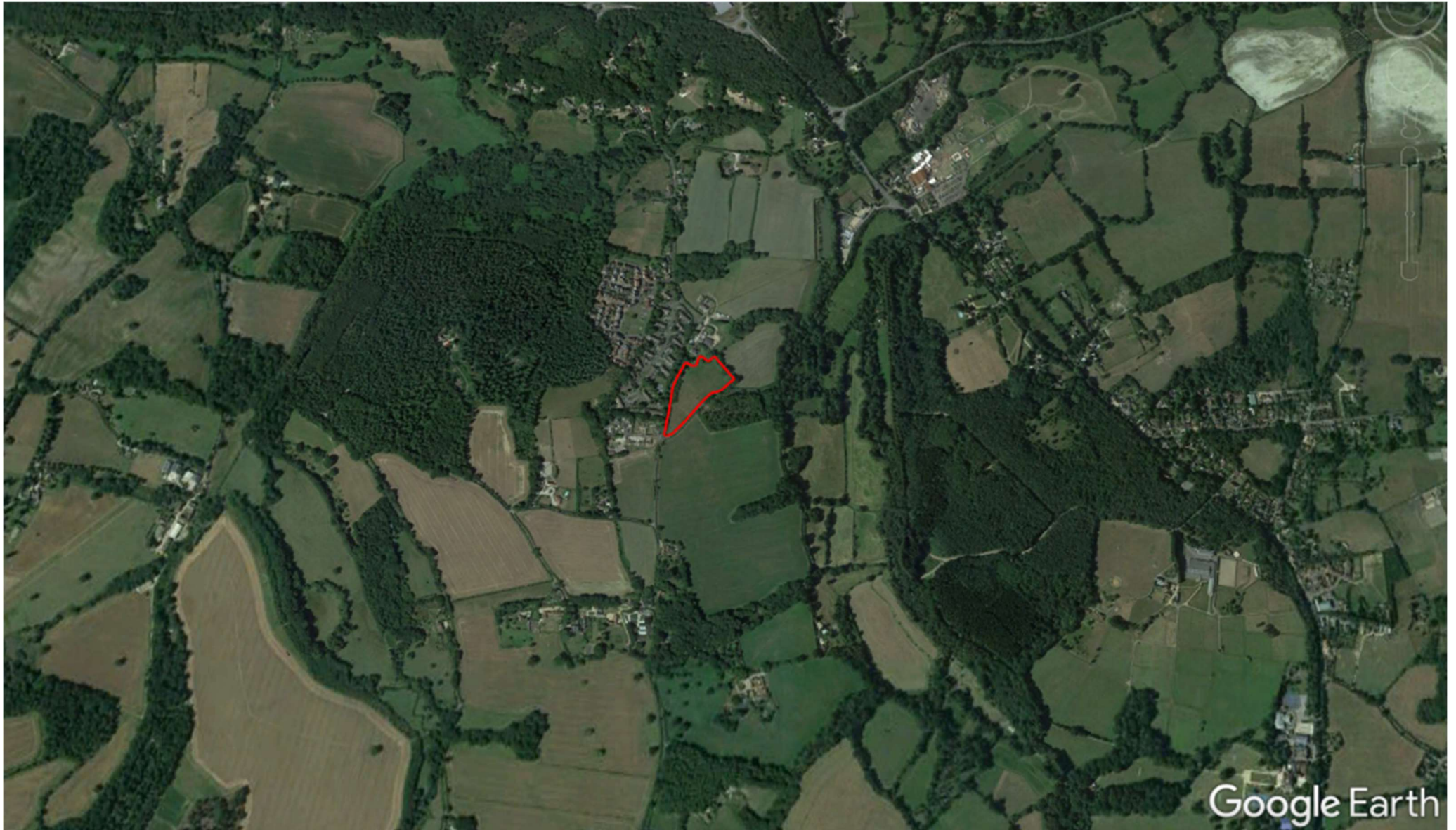
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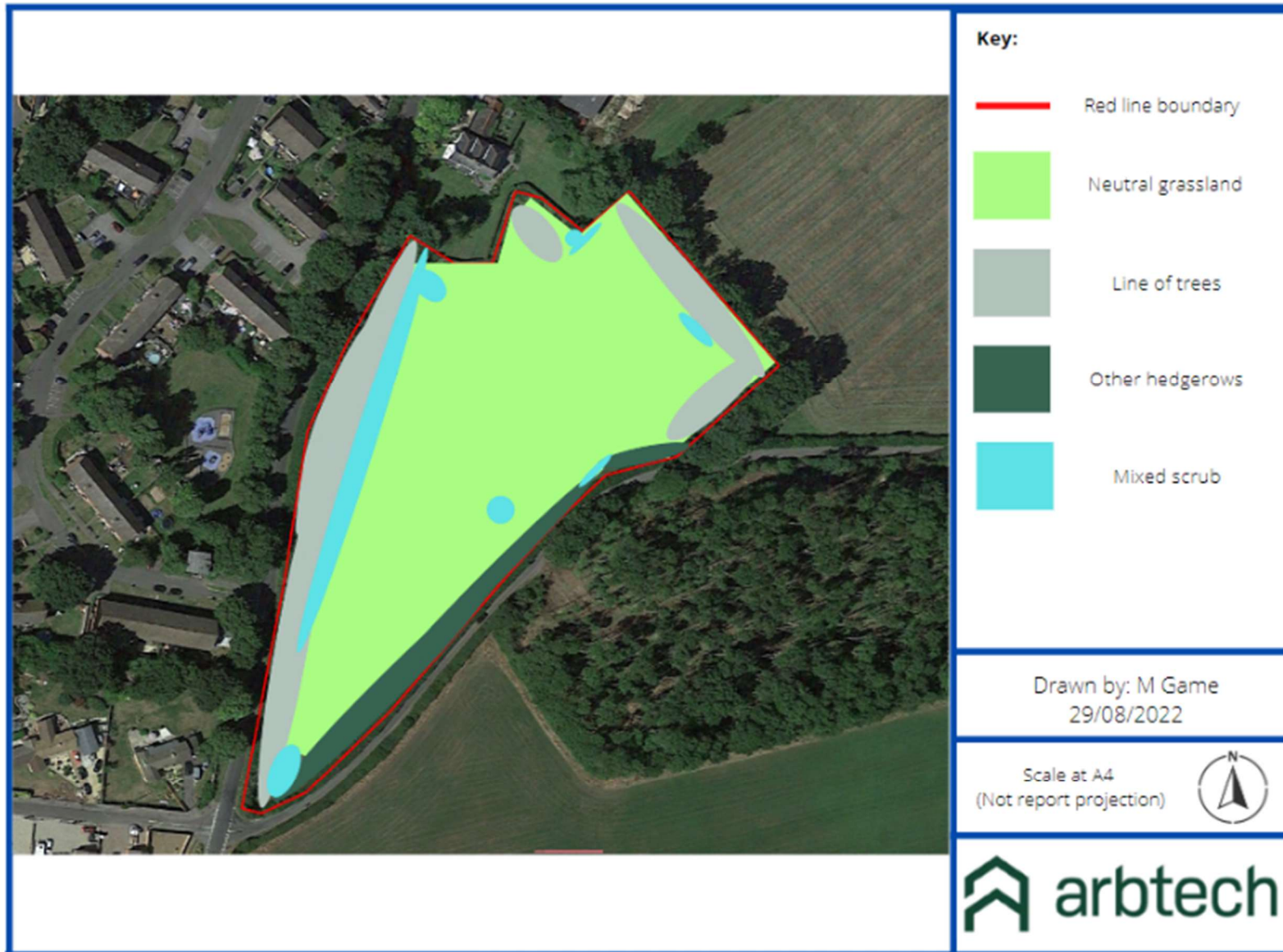
Appendix 1: Proposed Development Plan



Appendix 2: Site Location Plan



Appendix 3a: Habitat Survey Plan



Appendix 4: Legislation and Planning Policy

LEGAL PROTECTION

National and European Legislation Afforded to Habitats

International Statutory Designations

Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) are sites of European importance and are designated under the EC Habitats Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora (the Habitats Directive) and the EC Birds Directive 2009/147/EC on the conservation of wild birds (the Wild Birds Directive) respectively. Both form part of the wider Natura 2000 network across Europe.

Under the Habitats Directive Article 3 requires the establishment of a network of important conservation sites (SACs) across Europe. Over 1000 animal and plant species, as well as 200 habitat types, listed in the directive's annexes are protected in various ways:

Annex II species (about 900): core areas of their habitat are designated as Sites of Community importance (SCIs) and included in the Natura 2000 network. These sites must be managed in accordance with the ecological needs of the species.

Annex IV species (over 400, including many Annex II species): a strict protection regime must be applied across their entire natural range, both within and outside Natura 2000 sites.

Annex V species (over 90): their exploitation and taking in the wild is compatible with maintaining them in a favourable conservation status.

SPAs are classified under Article 2 of the Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds both for rare bird species (as listed on Annex I) and for important migratory species.

The Conservation of Habitats and Species Regulations 2017 (as amended) form the legal basis for the implementation of the Habitats and Birds Directives in terrestrial areas and territorial waters out to 12 nautical miles in England and Wales (including the inshore marine area) and to a limited extent in Scotland and Northern Ireland.

Ramsar sites are designated under the Convention on Wetlands of International Importance, agreed in Ramsar, Iran, in 1971. The Convention covers all aspects of wetland conservation and recognises the importance of wetland ecosystems in relation to global biodiversity conservation. The Convention refers to wetlands as “*areas of marsh, fen, peatland or water, whether natural or artificial, permanent or temporary, with water that is static or flowing, fresh, brackish or salt, including areas of marine water the depth of which at low tide does not exceed six metres*”. However, they may also include riparian and coastal zones. Ramsar sites are statutorily protected under the Wildlife & Countryside Act 1981 (as amended 01.04.1996) with further protection provided by the Countryside and Rights of Way (CRoW) Act 2000. Policy statements have been issued by the Government in England and Wales highlighting the special status of Ramsar sites. The Government in England and Wales has issued policy statements which ensure that Ramsar sites are afforded the same protection as areas designated under the EC Birds and Habitats Directives as part of the Natura 2000 network (e.g. SACs & SPAs). Further provisions for the protection and management of SSSIs have been introduced by the Nature Conservation (Scotland) Act 2004.

National Statutory Designations

Sites of Special Scientific Interest (SSSI) are designated by nature conservation agencies in order to conserve key flora, fauna, geological or physio-geographical features within the UK. The original designations were under the National Parks and Access to the Countryside Act 1949 but SSSIs were then re-designated under the Wildlife & Countryside Act 1981 (as amended). As well as reinforcing other national designations (including National Nature Reserves), the system also provides statutory protection for terrestrial and coastal sites which are important within the European Natura 2000 network and globally.

Local Statutory Designations

Local authorities in consultation with the relevant nature conservation agency can declare Local Nature Reserves (LNRs) under the National Parks and Access to the Countryside Act 1949. LNRs are designated for flora, fauna or geological interest and are managed locally to retain these features and provide research, education and recreational opportunities.

Non- Statutory Designations

All non-statutorily designated sites are referred to as Local Wildlife Sites (LWS) and can be designated by the local authority for supporting local conservation interest. Combined with statutory designation, these sites are considered within Local Development Frameworks under the Town and Country Planning system and are a material consideration during the determination of planning applications. The protection afforded to these sites varies depending on the local authority involved.

Regionally Important Geological Sites (RIGs) are the most important geological and geomorphological areas outside of statutory designations. These sites are also a material consideration during the determination of planning applications.

The Hedgerow Regulations 1997

The Hedgerow Regulations 1997 are designed to protect 'important' countryside hedgerows. Importance is defined by whether the hedgerow (a) has existed for 30 years or more; or (b) satisfies at least one of the criteria listed in Part II of Schedule 1 of the Regulations.

Under the Regulations, it is against the law to remove or destroy hedgerows on or adjacent to common land, village greens, SSSIs (including all terrestrial SACs, NNRs and SPAs), LNRs, land used for agriculture or forestry and land used for the keeping or breeding of horses, ponies or donkeys without the permission of the local authority. Hedgerows 'within or marking the boundary of the curtilage of a dwelling-house' are excluded.

National and European Legislation Afforded to Species

The Conservation of Habitats and Species Regulations 2017 (as amended)

The Conservation of Habitats and Species Regulations 2017 (as amended) aims to promote the maintenance of biodiversity by requiring the Secretary of State to take measures to maintain or restore wild species listed within the Regulations at a favourable conservation status.

The Regulations make it an offence (subject to exceptions) to deliberately capture, kill, disturb, or trade in the animals listed in Schedule 2, or pick, collect, cut, uproot, destroy, or trade in the plants listed in Schedule 4. However, these actions can be made lawful through the granting of licenses by the appropriate authorities. Licenses may be granted for a number of purposes (such as science and education, conservation, preserving public health and safety), but only after the appropriate authority is satisfied that there are no satisfactory alternatives and that such actions will have no detrimental effect on wild population of the species concerned.

The Wildlife and Countryside Act (WCA) 1981 (as amended)

The Wildlife and Countryside Act (WCA) 1981 (as amended) implements the Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention 1979, implemented 1982) and implements the species protection requirements of EC Birds Directive 2009/147/EC on the conservation of wild birds in Great Britain (the birds Directive). The WCA 1981 has been subject to a number of amendments, the most important of which are through the Countryside and Rights of Way (CRoW) Act (2000).

Other legislative Acts affording protection to wildlife and their habitats include:

- Deer Act 1991
- Natural Environment & Rural Communities (NERC) Act 2006
- Protection of Badgers Act 1992
- Wild Mammals (Protection) Act 1996

Badgers

Badgers *Meles meles* are protected under The Protection of Badgers Act 1992 which makes it an offence to:

- Wilfully kill, injure, take, or attempt to kill, injure or take a badger
- Cruelly ill-treat a badger, including use of tongs and digging
- Possess or control a dead badger or any part thereof
- Intentionally or recklessly damage, destroy or obstruct access to a badger sett or any part thereof
- Intentionally or recklessly disturb a badger when it is occupying a badger sett
- Intentionally or recklessly cause a dog to enter a badger sett
- Sell or offers for sale, possesses or has under his control, a live badger

Effects on development works:

A development licence will be required from the relevant countryside agency (i.e. Natural England, Natural Resources Wales, Scottish Natural Heritage) for any development works likely to affect an active badger sett, or to disturb badgers whilst they occupy a sett. Guidance has been issued by the countryside agencies to define what would constitute a licensable activity. It is no possible to obtain a licence to translocate badgers.

Birds

With certain exceptions, all birds, their nests and eggs are protected under Sections 1-8 of the WCA. Among other things, this makes it an offence to:

- Intentionally (or recklessly in Scotland) kill, injure or take any wild bird
- Intentionally (or recklessly in Scotland) take, damage or destroy (or, in Scotland, otherwise interfere with) the nest of any wild bird while it is in use or being built
- Intentionally take or destroy an egg of any wild bird
- Sell, offer or expose for sale, have in his possession or transport for the purpose of sale any wild bird (dead or alive) or bird egg or part thereof.
- Intentionally or recklessly obstruct or prevent any wild bird from using its nest (Scotland only)

Certain species of bird, for example the barn owl, bittern and kingfisher receive additional protection under Schedule 1 of the WCA and are commonly referred to as “Schedule 1” birds.

This affords them protection against:

- Intentional or reckless disturbance while it is building a nest or is in, on or near a nest containing eggs or young
- Intentional or reckless disturbance of dependent young of such a bird
- In Scotland only, intentional or reckless disturbance whilst lekking
- In Scotland only, intentional or reckless harassment

Effects on development works:

Works should be planned to avoid the possibility of killing or injuring any wild bird or damaging or destroying their nests. The most effective way to reduce the likelihood of nest destruction in particular is to undertake work outside the main bird nesting season which typically runs from March to August. Where this is not feasible, it will be necessary to have any areas of suitable habitat thoroughly checked for nests prior to vegetation clearance.

Schedule 1 birds are additionally protected against disturbance during the nesting season. Thus, it will be necessary to ensure that no potentially disturbing works are undertaken in the vicinity of the nest. The most effective way to avoid disturbance is to postpone works until the young have fledged. If this is not feasible, it may be possible to maintain an appropriate buffer zone or standoff around the nest.

Amphibians and Reptiles

The sand lizard *Lacerta agilis*, smooth snake *Coronella austriaca*, natterjack toad *Epidalea calamita*, pool frog *Pelophylax lessonae* and great crested newt *Triturus cristatus* receive full protection under Habitats Regulations through their inclusion on Schedule 2. Regulation 41 prohibits:

- Deliberate killing, injuring or capturing of Schedule 2 species
- Deliberate disturbance of species in such a way as:
 - To impair their ability to survive, breed, or reproduce, or to rear or nurture young;
 - To impair their ability to hibernate or migrate
 - To affect significantly the local distribution or abundance of the species
- Damage or destruction of a breeding site or resting place

With the exception of the pool frog, these species are also listed on Schedule 5 of the WCA and they are additionally protected from:

- Intentional or reckless disturbance (at any level)
- Intentional or reckless obstruction of access to any place of shelter or protection
- Selling, offering or exposing for sale, possession or transporting for purpose of sale.

Other native species of reptiles are protected solely under Schedule 5, Section 9(1) & (5) of the WCA, i.e. the adder *Vipera berus*, grass snake *Natrix natrix*, common lizard *Zootoca vivipara* and slow-worm *Anguis fragilis*. It is prohibited to:

- Intentionally or recklessly kill or injure these species.

Effects on development works:

A European Protected Species Licence (EPSL) issued by the relevant countryside agency (i.e. Natural England, Natural Resources Wales, Scottish Natural Heritage) will be required for works likely to affect the breeding sites or resting places amphibian and reptile species protected under Habitats Regulations. A licence will also be required for operations liable to result in a level of disturbance which might impair their ability to undertake those activities mentioned above (e.g. survive, breed, rear young and hibernate). The licences are to allow derogation from the relevant legislation, but also to enable appropriate mitigation measures to be put in place and their efficacy to be monitored.

Although not licensable, appropriate mitigation measures may also be required to prevent the intentional killing or injury of adder, grass snake, common lizard and slow worm, thus avoiding contravention of the WCA.

Water Voles

The water vole *Arvicola terrestris* is fully protected under Schedule 5 of the WCA. This makes it an offence to:

- Intentionally kill, injure or take (capture) water voles

- Intentionally or recklessly damage, destroy or obstruct access to any structure or place used for shelter or protection
- Intentionally or recklessly disturb water voles while they are occupying a structure or place used for shelter or protection

Effects on development works:

If development works are likely to affect habitats known to support water voles, the relevant countryside agency (i.e. Natural England, Natural Resources Wales, Scottish Natural Heritage) must be consulted. It must be shown that means by which the proposal can be re-designed to avoid contravening the legislation have been fully explored e.g. the use of alternative sites, appropriate timing of works to avoid times of the year in which water voles are most vulnerable, and measures to ensure minimal habitat loss. Conservation licences for the capture and translocation of water voles may be issued by the relevant countryside agency for the purpose of development activities if it can be shown that the activity has been properly planned and executed and thereby contributes to the conservation of the population. The licence will then only be granted to a suitably experienced person if it can be shown that adequate surveys have been undertaken to inform appropriate mitigation measures. Identification and preparation of a suitable receptor site will be necessary prior to the commencement of works.

Otters

Otters *Lutra lutra* are fully protected under the Conservation Regulations through their inclusion on Schedule 2. Regulation 41 prohibits:

- Deliberate killing, injuring or capturing of Schedule 2 species
- Deliberate disturbance of species in such a way as:
 - To impair their ability to survive, breed, or reproduce, or to rear or nurture young;
 - To impair their ability to hibernate or migrate
 - To affect significantly the local distribution or abundance of the species
 - Damage or destruction of a breeding site or resting place

Otters are also currently protected under the WCA through their inclusion on Schedule 5. Under this Act, they are additionally protected from:

- Intentional or reckless disturbance (at any level)
- Intentional or reckless obstruction of access to any place of shelter or protection

Effects on development works:

A European Protected Species Licence (EPSL) issued by the relevant countryside agency (i.e. Natural England, Natural Resources Wales, Scottish Natural Heritage) will be required for works likely to affect otter breeding or resting places (often referred to as holts, couches or dens) or for operations likely to result in a level of disturbance which might impair their ability to undertake those activities mentioned above (e.g. survive, breed, and rear young). The licence is to allow derogation from the relevant legislation but also to enable appropriate mitigation measures to be put in place and their efficacy to be monitored

Bats

All species are fully protected by Habitats Regulations 2010 as they are listed on Schedule 2. Regulation 41 prohibits:

- Deliberate killing, injuring or capturing of Schedule 2 species (e.g. All bats)
- Deliberate disturbance of bat species in such a way as:
 - To impair their ability to survive, breed, or reproduce, or to rear or nurture young;
 - To impair their ability to hibernate or migrate
 - To affect significantly the local distribution or abundance of the species
- Damage or destruction of a breeding site or resting place

Bats are afforded the following additional protection through the WCA as they are included on Schedule 5:

- Intentional or reckless disturbance (at any level)
- Intentional or reckless obstruction of access to any place of shelter or protection

Effects on development works:

A European Protected Species Licence (EPSL) issued by the relevant countryside agency (i.e. Natural England, Natural Resources Wales, Scottish Natural Heritage) will be required for works are likely to affect a bat roost or an operation which are likely to result in an illegal level of disturbance to the species will require an EPSM licence. The licence is to allow derogation from the legislation through the application of appropriate mitigation measures and monitoring.

Hazel Dormice

Hazel dormice *Muscardinus avellanarius* are fully protected under Habitats Regulations through their inclusion on Schedule 2. Regulation 41 prohibits:

- Deliberate killing, injuring or capturing of Schedule 2 species
- Deliberate disturbance of species in such a way as:
 - To impair their ability to survive, breed, or reproduce, or to rear or nurture young;
 - To impair their ability to hibernate or migrate
 - To affect significantly the local distribution or abundance of the species
- Damage or destruction of a breeding site or resting place

Dormice are also protected under the WCA through their inclusion on Schedule 5. Under this Act, they are additionally protected from:

- Intentional or reckless disturbance (at any level)
- Intentional or reckless obstruction of access to any place of shelter or protection

Effects on development works:

Works which are liable to affect a dormice habitat or an operation which are likely to result in an illegal level of disturbance to the species will require a European Protected Species Licence (EPSL) issued by the relevant countryside agency (i.e. Natural England, Natural Resources Wales (NB: Hazel Dormouse are entirely absent from Scotland)). The licence is to allow derogation from the legislation through the application of appropriate mitigation measures and monitoring.

White Clawed Crayfish

There is a considerable amount of legislation in place in an attempt to protect the White-clawed crayfish *Austropotamobius pallipes*. This species is listed under the European Union's (EU) Habitat and Species Directive and is listed under Schedule 5 of the Wildlife and Countryside Act (1981). This makes it an offence to:

- Protected against intentional or reckless taking
- Protected against selling, offering or advertising for sale, possessing or transporting for the purpose of sale

It is also classified as Endangered in the IUCN Red List of Endangered Species. As a result of this and other relevant crayfish legislation such as the Prohibition of Keeping of Live Fish (Crayfish) Order 1996, a series of licences are needed for working with White-clawed and non-native crayfish. These are:

- A licence to handle crayfish (therefore survey work) in England
- A licence for the keeping of crayfish in England and Wales with an exemption for Signal crayfish (England).
- People in the post-code areas listed with crayfish present prior to 1996 do not need to apply for consent for crayfish already established. It does not, however, allow any new stocking of non-native crayfish into waterbodies. Consent for trapping of non-native crayfish for control or consumption is most likely to be granted in Thames and Anglian regions in the areas with "go area" postcodes.
- Harvesting of crayfish is prohibited in much of England and in any part of Scotland and Wales.

Effects on development works:

The relevant countryside agency (i.e. Natural England, Natural Resources Wales, Scottish Natural Heritage) will need to be consulted about development which could impact on a watercourse or wetland known to support white clawed crayfish. Conservation licences for the capture and translocation of crayfish can be issued if it can be shown that the activity has been properly planned and executed and thereby contributes to the conservation of the population. The licence will only be granted to a suitably experienced person if it can be shown that adequate surveys have been undertaken to inform appropriate mitigation measures. Identification and preparation of a suitable receptor site will be necessary prior to the commencement of the works.

Wild Mammals (Protection Act) 1996

All wild mammals are protected against intentional acts of cruelty under the above legislation. This makes it an offence to mutilate, kick, beat, nail or otherwise impale, stab, burn, stone, crush, drown, drag or asphyxiate any wild mammal with intent to inflict unnecessary suffering.

To avoid possible contravention, due care and attention should be taken when carrying out works (for example operations near burrows or nests) with the potential to affect any wild mammal in this way, regardless of whether they are legally protected through other conservation legislation or not.

Legislation Afforded to Plants

With certain exceptions, all wild plants are protected under the WCA. This makes it an offence for an 'unauthorised' person to intentionally (or recklessly in Scotland) uproot wild plants. An authorised person can be the owner of the land on which the action is taken, or anybody authorised by them.

Certain rare species of plant, for example some species of orchid, are also fully protected under Schedule 8 of the Wildlife and Countryside Act 1981 (as amended). This prohibits any person from:

- Intentionally (or recklessly in Scotland) picking, uprooting or destruction of any wild Schedule 8 species (or seed or spore attached to any such wild plant in Scotland only)
- Selling, offering or exposing for sale, or possessing or transporting for the purpose of sale, any wild live or dead Schedule 8 plant species or part thereof
- In addition to the UK legislation outlined above, several plant species are fully protected under Schedule 5 of The Conservation of Habitats and Species Regulations 2010. These are species of European importance. Regulation 45 makes it an offence to:
 - Deliberately pick, collect, cut, uproot or destroy a wild Schedule 5 species
 - Be in possession of, or control, transport, sell or exchange, or offer for sale or exchange any wild live or dead Schedule 5 species or anything derived from such a plant.

Effects on development works:

A European Protected Species Licence (EPSL) will be required from the relevant countryside agency (i.e. Natural England, Natural Resources Wales, Scottish Natural Heritage) for works which are likely to affect species of planted listed on Schedule 5 of the Conservation or Habitats and Species Regulations 2010. The licence is to allow derogation from the legislation through the application of appropriate mitigation measures and monitoring.

Invasive Species

Part II of Schedule 9 of the WCA lists non-native invasive plant species for which it is a criminal offence in England and Wales to plant or cause to grow in the wild due to their impact on native wildlife. Species included (but not limited to):

- Japanese knotweed *Fallopia japonica*
- Giant hogweed *Heracleum mantegazzianum*
- Himalayan balsam *Impatiens glandulifera*

Effects on development works:

It is not an offence for plants listed in Part II of Schedule 9 of the WCA 1981 to be present on the development site, however, it is an offence to cause them to spread. Therefore, if any of the species are present on site and construction activities may result in further spread (e.g. earthworks, vehicle movements) then it will be necessary to design and implement appropriate mitigation prior to construction commencing.

Injurious weeds

Under the Weeds Act 1959 any landowner or occupier may be required prevent the spread of certain 'injurious weeds' including (but not limited to):

- Spear thistle *Cirsium vulgare*
- Creeping thistle *Cirsium arvense*
- Curled dock *Rumex crispus*
- Broad-leaved dock *Rumex obtusifolius*
- Common ragwort *Senecio jacobaea*

Effects on development works:

It is a criminal offence to fail to comply with a notice requiring such action to be taken. The Ragwort Control Act 2003 establishes a ragwort control code of practice as common ragwort is poisonous to horses and other livestock. This code provides best practice guidelines and is not legally binding.

NATIONAL PLANNING POLICY (ENGLAND)

Environment Act 2021

The Environment Act 2021 (EA 2021) received Royal Assent on 9 November 2021 and is expected to become fully mandated within the next couple of years. The Act principally creates a post Brexit framework to protect and enhance the natural environment. Through amendments to the Town and Country Planning Act 1990, the Act will require all planning permissions in England (subject to exemptions which is likely to include householder applications) to be granted subject to a new general pre-commencement condition that requires approval of a biodiversity net gain plan. This will ensure the delivery of a minimum of 10% measurable biodiversity net gain. The principal tool to calculate this will be the Defra Biodiversity 3.0 Metric. Works to enhance habitats can be carried out either onsite or offsite or through the purchase of 'biodiversity credits' from the Secretary of State. However, this flexibility may be removed (subject to regulations) if the onsite habitat is 'irreplaceable'. Both onsite and offsite enhancements must be maintained for at least 30 years after completion of a development (which period may be amended).

National Planning Policy Framework 2021

The National Planning Policy Framework promotes sustainable development. The Framework specifies the need for protection of designated sites and priority habitats and species. An emphasis is also made on the need for ecological infrastructure through protection, restoration and re-creation. The protection and recovery of priority species (considered likely to be those listed as species of principal importance under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006) is also listed as a requirement of planning policy.

In determining a planning application, planning authorities should aim to conserve and enhance biodiversity by ensuring that: designated sites are protected from harm; there is appropriate mitigation or compensation where significant harm cannot be avoided; measurable gains in biodiversity in and around developments are incorporated; and planning permission is refused for development resulting in the loss or deterioration of irreplaceable habitats including aged or veteran trees and also ancient woodland.

The Natural Environment and Rural Communities Act 2006 and the Biodiversity Duty

Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006, requires all public bodies to have regard to biodiversity conservation when carrying out their functions. This is commonly referred to as the 'biodiversity duty'.

Section 41 of the Act requires the Secretary of State to publish a list of habitats and species which are of 'principal importance for the conservation of biodiversity'. This list is intended to assist decision makers such as public bodies in implementing their duty under Section 40 of the Act. Under the Act these habitats and species are regarded as a material consideration in determining planning applications. A developer must show that their protection has been adequately addressed within a development proposal.

EUROPEAN PROTECTED SPECIES POLICIES

In December 2016 Natural England officially introduced the four licensing policies throughout England. The four policies seek to achieve better outcomes for European Protected Species (EPS) and reduce unnecessary costs, delays and uncertainty that can be inherent in the current standard EPS licensing system. The policies are summarised as follows:

- Policy 1; provides greater flexibility in exclusion and relocation activities, where there is investment in habitat provision;
- Policy 2; provides greater flexibility in the location of compensatory habitat;
- Policy 3; provides greater flexibility on exclusion measures where this will allow EPS to use temporary habitat; and,
- Policy 4; provides a reduced survey effort in circumstances where the impacts of development can be confidently predicted.

The four policies have been designed to have a net benefit for EPS by improving populations overall and not just protecting individuals within development sites. Most notably Natural England now recognises that the Habitats Regulations legal framework now applies to 'local populations' of EPS and not individuals/site populations.

APPENDIX 4 – ACCESSIBILITY TECHNICAL NOTE

Technical Note

Accessibility Study

Land at Bishop's Green Farmhouse, Ecchinswell Road, Bishops Green, RG20 4JP

Project Number: 22285
Doc Number: TN01
Prepared for: Sedas Strategic Land

30 September 2022

Rev	Issue Purpose	Author	Checked	Reviewed	Approved	Date
A	Client Comment	BRDG	DT	DT	DT	30/09/22

1. Introduction

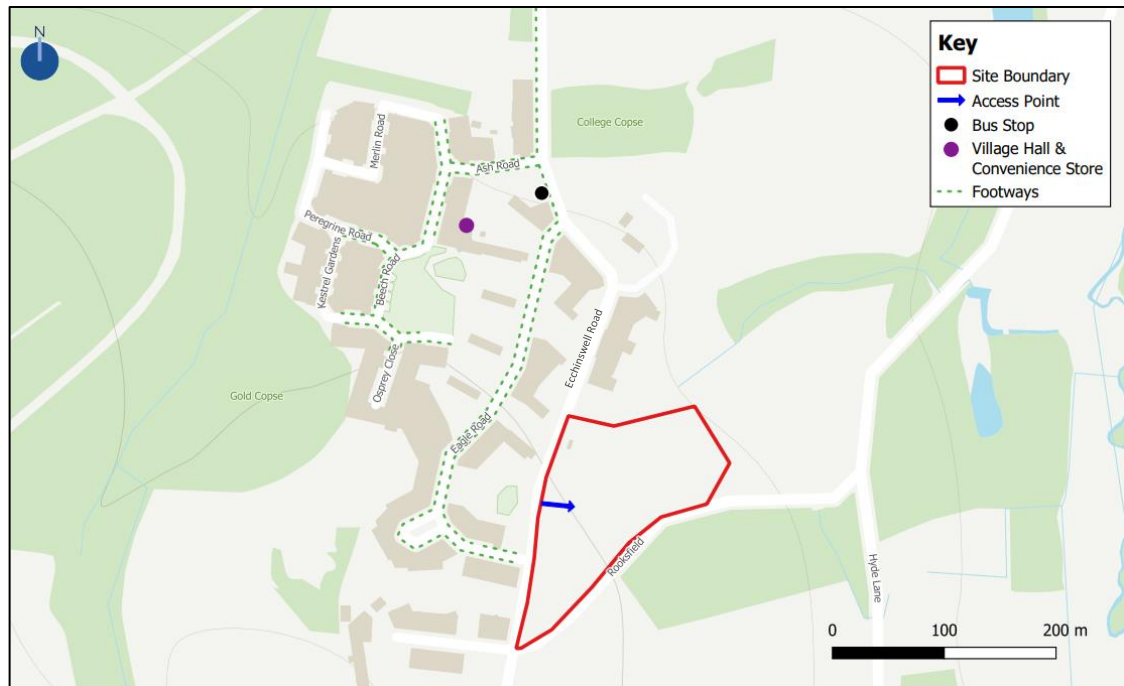
Overview

- 1.1 Markides Associates has been instructed by Sedas Strategic Land to prepare a Technical Note in relation to an undeveloped site at Bishop's Green Farmhouse, Ecchinswell Road, Bishops Green, to support the promotion of the site in the emerging Basingtoke and Deane District Local Plan for future residential development.
- 1.2 The site is currently being promoted for circa 27 residential units with a mix of affordable and open market dwellings, associated car parking and open space.

Site Location

- 1.3 The site is bound to the north by Bishop's Green Farmhouse, to the east by greenfield land, to the south by Hyde Lane and to the west by Ecchinswell Road. The site location relative to the surrounding area and transport networks is shown in **Figure 1.1**.

Figure 1.1 Site Context Plan



2. Site Accessibility

Local Highway Network

- 2.1 Ecchinswell Road is a single-carriageway road of approximately 5.5m in width (with widening in places to aid larger vehicles passing) and is subject to a 40mph speed limit. It travels in a north to south direction between the A339 and Sydmonton Road.
- 2.2 Hyde Lane is a two-way single-track road of approximately 4m wide with passing places. It meets Ecchinswell Road in a bell-mouth priority junction. Both Ecchinswell Road and Hyde Lane lead to the main A393 route which offers links to other nearby towns.
- 2.3 Eagle Road is a two-way residential road which is approximately 400m long and routes to and from Ecchinswell Road, meeting in two simple priority-controlled junctions. It provides access to a number of properties and has on-street parking.

Vehicular Access

- 2.4 It is proposed that the development site would take access from Ecchinswell Road by all modes, via a simple priority-controlled junction, approximately 45m north of the existing junction with Eagle Road. The preliminary access design is shown in **Figure 2.1**, this is an extract of the drawing (Ref: 22285-MA-XX-DR-C-001-P01) in **Appendix A**.

2.10 There is a continuous footway on along at least one side of Eagle Road, with the exception of a small section where four parking spaces break the footway on the northern side of the road near the junction with Echchinswell Road.

Development Proposals

2.11 Any future development proposals would provide pedestrian access from the new junction on Echchinswell Road, connecting to an internal network of footways and footpaths to facilitate pedestrian movement through the site.

2.12 As there are no footways along Echchinswell Road adjacent to the proposed site access, any future development would provide a new off-site footway link and uncontrolled dropped kerb crossing between the development and Eagle Road, subject to further discussions and agreement with Basingstoke and Deane Borough Council (BDBC) and Hampshire County Council. This would enable pedestrian access to the development site from the existing network of footways along Eagle Road and connection to the wider pedestrian network through the village, including Bishop Green Village Hall and the convenience store by a less than 10 min (approx.) walk.

2.13 With regards to cycling, the proposed development would provide cycle parking for residents and visitors in accordance with the BDBC standards. However, it is noted that the site location is remote from a formal cycleway and on-road cycling would be better suited to experienced cyclists.

Bus

2.14 There are northbound and southbound bus stops located on Echchinswell Road, immediately north of the junction with Eagle Road (north), known as the ‘Ash Road’ stops. They are served by buses routing between Greenham Common and Newbury. The bus timetable for the Ash Road stops is detailed in **Table 2.1** below.

Table 2.1 Public Transport Table

Bus Service	Route	Weekday Services	
		AM	PM
103	Greenham Common - Newbury	08:16, 09:16	-
	Newbury – Greenham Common	-	Hourly from 15:56 to 18:56
103a	Greenham Common - Newbury	-	Hourly from 15:16 to 18:16
	Newbury – Greenham Common	09:59	-
103b	Greenham Common - Newbury	10:16, 11:16	12:16, 13:16, 14:16
	Newbury – Greenham Common	10:59, 11:59	12:59, 14:59
103c	Bishop’s Green – Greenham Common	07:25	-

2.15 **Table 2.1** demonstrates that there are weekday AM and PM bus services connecting the site to Newbury which would typically suit travel for commuting purposes.

2.16 As discussed, there is currently no pedestrian link between the site and the existing bus stops on Ecchinswell Road. However, provision of a new footway connection between the site and Eagle Road would enable the bus stops to be reached on foot via Eagle Road in a 6 minute (approx.) walk from the development.

Future Improvements

2.17 A planning application for 350 dwellings on the land to the north and east of the proposed development site was submitted in 2021. This application proposed new footway connections along Ecchinswell Road and public transport improvements, comprising a new shelter and hardstanding for the northbound Ash Road bus stop, and provision of a new southbound bus stop nearer to Eagle Road (north) (i.e. nearer to the proposed development site) to support the development.

2.18 Whilst this application is yet to be determined, the proposals would bring forward additional sustainable travel improvements to support the proposals which would inextricably provide benefits to the wider area.

3. Travel Characteristics

3.1 An indicative trip generation exercise has been undertaken based on the trip rates applied in the Transport Assessment for the adjacent site, which were agreed with HCC. The vehicle trips rates and the resultant number of trips in the highway AM and PM peak periods and over the course of the day is outlined in **Table 3.1**.

Table 3.1 Trip rates

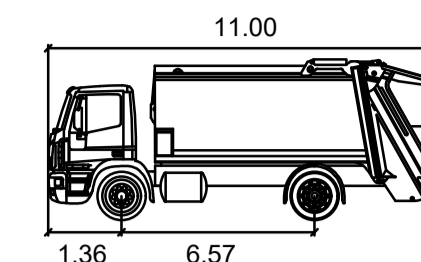
	AM Peak (08:00 09:00)			PM Peak (17:00 18:00)			Daily Flows		
	In	Out	Total	In	Out	Total	In	Out	Total
Trip Rate (1 dwelling)	0.15	0.41	0.56	0.39	0.16	0.55	2.644	2.595	5.239
Trip Generation (27 dwellings)	4	11	15	11	4	15	71	70	141

3.2 As shown above, the proposed development would be expected to generate in the region of 15 two-way vehicle trips in the AM and PM peak periods respectively. This represents a minimal number of new trips and would not be expected to have a detrimental effect to the highway network and could be accommodated by the proposed junction arrangement.

4. Summary

- 4.1 It is evident from the above that suitable access can be provided to accommodate the quantum of development proposed.
- 4.1 In addition, sufficient pedestrian infrastructure can be provided to ensure an appropriate connection from the development site via Eagle Road to Bishop Green Village Hall and the convenience store can be accommodated.
- 4.2 The site is also in proximity to a reasonable bus service providing sustainable connections to a number of larger destinations.

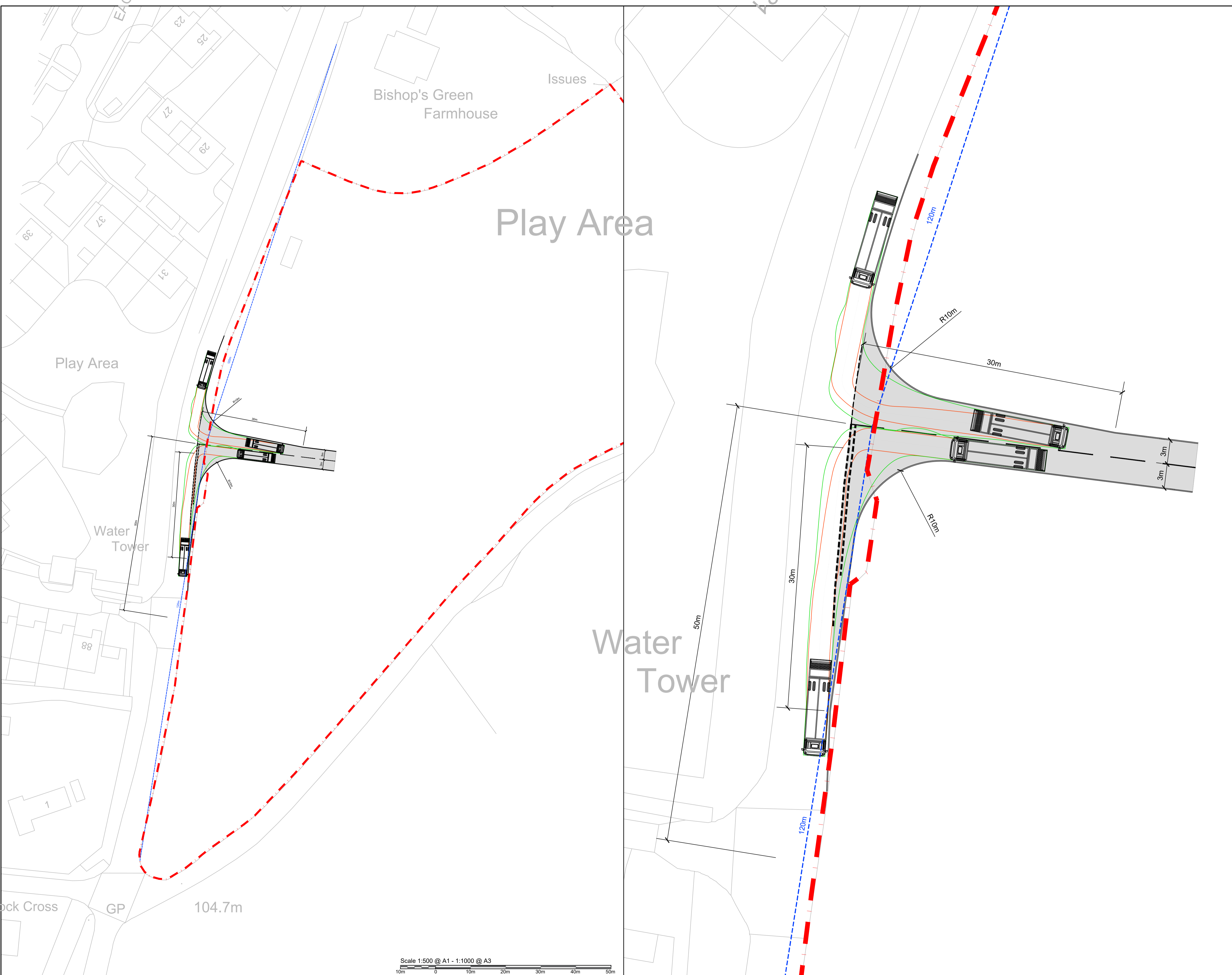
APPENDIX A – PRELIMINARY ACCESS DESIGN



Iveco ML 180 (2009) meters
 Width : 2.47
 Track : 2.45
 Lock to Lock Time : 6.0
 Steering Angle : 51.5

KEY

- - - SITE BOUNDARY
- VEHICLE BODY LINE
- VEHICLE WHEEL LINE
- - - 2.4m x 120m 40mph VISIBILITY SPLAY
- PROPOSED CARRIAGEWAY



Revision History					
Rev	Comment	By	Chkd	Appr	Date
P01	FOR INFORMATION	RLM	DT	DT	29.09.22
Rev	Comment	By	Chkd	Appr	Date
Current Revision					
P01	FOR INFORMATION	RLM	DT	DT	29.09.22
Rev	Comment	By	Chkd	Appr	Date

S2 - FOR INFORMATION
SEDAS STRATEGIC LAND



Project
**ECCHINSWELL ROAD
 BISHOPS GREEN**
 Drawing Title
PROPOSED PRIORITY JUNCTION

Scale 1:500 @ A1 - 1:1000 @ A3
 10m 0 10m 20m 30m 40m 50m

Scale 1:200 @ A1 - 1:400 @ A3
 4m 0 4m 8m 12m 16m 20m