

**APP/24/00612. Development of 43 homes at Lower Road Bedhampton.
Reserved Matters application for Outline Planning permission APP/21/01071.**

Comments on behalf of Havant Climate Alliance and Havant Friends of the Earth

We are taking a NEUTRAL position. Although there are many aspects of the development that we can support, we also have a number of concerns.

Ecology

The Planning Condition has been met, that prior to commencement there should be a site-wide Ecological Assessment with a Strategy for Mitigation and Enhancement, securing at least 10% biodiversity net gain. Surveys were carried out in 2023 – 2024. In fact it is claimed that there will be a 30% net gain. This is very positive if correct. A mosaic of habitats are proposed including species rich flower meadows.

It is planned to maintain habitats favourably for a minimum of 30 years, which is not enough. The site should be managed to protect biodiversity for as long as the homes are in use.

As the site is basically one field, no trees and hedges need to be removed for construction. We are pleased that the surrounding trees and vegetation will be retained to provide screening. With the new native-species hedge planted along the east of the site (between phases 1 and 2) and an additional landscape buffer along the northern boundary, this will support a wildlife corridor, around the site. As new planting is proposed to augment these corridors, we hope that the emphasis will be on native species to encourage biodiversity.

There should be more larger trees and tall hedgerow shrubs planted along the southern boundary with the rail line, to provide a dense barrier. Long term this may help to reduce noise from the trains and the A27, plus help cut air pollution, which must be very heavy on this site. For the same reason we would also like to see the tree cover on the western edge being augmented to protect from the A3M junction.

We welcome proposals for allotments and a community orchards, but are concerned about the idea of a “multifunctional” green infrastructure/play space/ public space. Public and play spaces are needed and can be well landscaped and planted. However this cannot be seen as a contribution to biodiversity as there will be too much disturbance there to support wildlife. Such spaces cannot be included as part of the habitat contributing to biodiversity.

Phase 2 was a secondary support site for brent geese and waders. However it is no surprise that none have been seen here since before Phase 1 of the development started. They would have been put off by the amount of human disturbance from Phase 1. We see no chance of them returning when this 2nd phase of the development is built.

However recent surveys found other species of birds, including a pair of breeding skylarks. 6 bird nest boxes and 5 swift bricks or boxes are proposed across the site. We think there could be many more with at least one nest box or brick per house.

Surveys found 7 species of bats foraging or commuting across the site. No bat roosts were found. Bat friendly lighting is proposed. Perhaps red external lighting should be considered. Only 6 bat roosting structures are proposed for the site. We would like to see more.

There was no evidence of badgers but a fox has been seen as well as hedgehogs. A few slow worms were found along the field margin. The CEMP (Construction Environment Management Plan) will act to protect these species. Most will be protected by the retention of the woodland edge vegetation. Given the presence of hedgehogs, it is important that garden fences should have hedgehog holes to allow them to travel through the site.

Habitat creation for invertebrates is proposed in an area of public space, which we do not think is appropriate. This needs to happen at a distance away from the public amenity space.

Travel and transport

We are pleased that secure bike storage is provided for all homes, in garages or sheds. We welcome EV charge points available to all homes, placed beside parking areas.

We agree with the Ramblers Association that the footpaths and open spaces are welcome, providing pedestrian and cycle links to local amenities. We also agree with their suggestion that there should be a pedestrian link, and we think a cycle link, between these “internal” paths and the footway at the west end of Lower Road, on the north – west corner of the site. This would allow more direct access to routes going westwards. The current plan for all access to be via the phase 1 area, would require people to go a long way round.

We continue to be concerned about the risks of 43 extra households using the narrow dog-leg section of Lower Road. This is the only road access for all residents of Lower Road, already augmented by 50 new households from Phase 1 of the development. This very narrow section of road, with 2 blind bends, is without a pedestrian footpath, so pedestrians must walk in the road and cyclists may not be visible to drivers until too late. Although accidents have not occurred here in the past that does not mean that there are not high risks of future accidents and harm to pedestrians and cyclists. We agree with the Road Safety Audit, that there should be negotiations with private householders to look at the possibility of using a slice of their land for a pedestrian footpath (and we suggest a cycle path). Failing this, negotiations should look at removing high vegetation on private land that blocks visibility splays.

There should also be regular maintenance of the alleyway from Lodge Road to Bedhampton Hill Road, to make this a more attractive alternative route for people to use.

Flooding and drainage

Hampshire County Council as the Local Lead Flood Authority, previously raised concerns about flooding in this field due to poor surface water drainage. Bargate Homes have commissioned their own Flood Risk Assessment and Drainage Strategy. This makes the case that the proposed drainage attenuation basin by the southern boundary will deal with all flooding and drainage issues. There has not yet been confirmation from Hampshire that this is acceptable.

Tenure

30% of housing will be “affordable” i.e. 13 homes of which 4 will be for shared ownership and 9 will be for “affordable rent”. We would like to see the number of “affordable homes” increased to 40 %, given the large number of households on the housing waiting lists.

Sustainability

We are pleased that the homes will be designed to have a high level of insulation and energy efficiency, as well as using “low carbon renewable energy”. The nature of this is not elaborated. However we would like to see electric heat pumps installed. Preferably these should be ground source, rather than air source, as the former are more efficient at heating and cooling. They can also be less expensive to install during house construction, than retrofitted afterwards.

There would be an opportunity to fit many of the homes with Solar PV or Solar Thermal panels. Roof designs could be modified to accommodate this.

It is good that there are plans to limit water use to 110 litres per person per day. We suggest that systems to harvest grey water should be installed, and homes supplied with water butts.

Noise and Air Pollution

This will be a noisy place due to its location between 2 major trunk roads and a busy rail line. It will be worse for homes on the outer southern and western edges of the site.

The noise assessment recognises that noise levels will be high and much above the 30 db recommended as the maximum for internal noise at night. This means that people will not be able to enjoy being in their gardens, or having windows open in hot weather, especially at night. (This should have been sufficient reason not to build here, given evidence of the impact of such noise levels on people’s health). However, high quality glazing will be needed, and where alternative ventilation systems must be used, a “trickle venting” system, which does not depend on electrical power would be preferred to mechanical venting.

Planting a dense screen of trees along the southern boundary, and augmenting the tree cover in the west, previously suggested, might help to reduce some of the noise and air pollution.