

Submission against APP/19/00427

This is my personal submission objecting to APP/19/00427. I am a member of the Bedhampton Heritage Alliance which has the support of Bedhampton residents. The updated plans do not add any new features/solutions that alter my original conclusion that this application should be rejected on the grounds that there are still too many issues remaining in the plan which cause harm to the Conservation Area and its setting, ambiance and the safety of users of the amenity. These all far outweigh any good that may be derived from the development being progressed.

A. General Issues.

1. The benefits of a development should outweigh any harm to Conservation Area (CA) and its setting. Mitigation is a common word throughout this application. If something has to be mitigated it is a recognition that harm is being caused and that, that harm will never be completely nullified. Thus, there will be an erosion of the value of what existed before development. Bargate have only identified one factor which will be of benefit, the need for housing within the Borough. The 50 dwellings proposed are only 0.5% of the total housing allocation (2036) which has a 10% buffer. A development at this site should only be considered in the last resort.
2. There will be an erosion of the amenity of the CA which attracts walkers and cyclists from outside the area. It will impact negatively on the semi-rural ambiance of the CA and its setting with erosion of the tranquillity and safety of the whole area. None of this is recognised in the application.
3. Any development will erode the value of the CA and its setting. As a consequence, this will make it more difficult to resist any future planning applications on lands to the east, south and west of H20.
4. There are serious concerns that with the incremental impact of local developments, completed and proposed (C10, H40, H14, H22, H20), that the cumulative effect on current infrastructure, some of which is at capacity will be appalling. The main concern surrounds the mini roundabout on the B2177 at the confluence of Bedhampton Hill Road, Portsdown Hill Road, Maylands Road, Bedhampton Road and Brookside Road. Infrastructure deficiencies should be addressed before there is any further development.
5. A similar planning application was submitted and subsequently rejected by an independent inspector in 2014 on the grounds that the harm to the CA and its setting resulting from the construction of 15 houses far outweighed any good. This land allocation did not appear in the 2026 plan. It is now included in the PsP which is imminently due to be submitted to an EiP. Its inclusion in HBC LP 2036 is judged by the public to be unsound and will hopefully be challenged in the very near future. The submission of APP/19/00427 at this time is speculative and opportunistic in the hope of avoiding EiP. DMC should defer any determination until EiP has had a chance to test the soundness of HBC LP 2036.

B. Issues offsite.

1. i-Transports report on traffic movements is breathtakingly glib and contains many inaccuracies and omissions. These are their words: "vanishingly small impact", "impeccable

safety record". The credibility of the report is very questionable. The report can be summarised as follows:

- There appears to be something awry with the arithmetic and calculations between the various tables.
 - Text for Manual for streets is quoted out of context.
 - The references to the school/work journey by bus and train or by bicycle do not make sense for either children or adults. Children would be cycling on busy commuter routes in the am peak if not also in the pm peak.
- This whole subject of traffic numbers, safety of shared space users and traffic sustainability will be addressed in much greater depth in a submission by [REDACTED]

2. Traffic leaving the mini roundabout to turn right into Brookside Road at evening peak is now close to causing gridlock and thus becoming a significant hazard to the roundabout.

3. A possible Plan for a Traffic Light controlled junction instead of the mini roundabout has been proposed. It will have the effect of precluding a right turn out of Brookside in order to proceed to Havant. This will risk making Bidbury and Kingscroft Lanes into a rat run, resulting in increased vehicle movement through the heart of the CA along single tracked lanes. A further threat to ambiance and safety.

4. Portsdown Hill Road is already near to or at capacity and will worsen with developments at H14, H20, H22 & H40 as well as other developments around the Borough.

5. Highways England should sign off/comment on any significant impact of C10, H40, H22, H20 & H14 on the Rusty Cutter and Tear drop roundabouts as well as A3M and A27.

6. Lower Road with 3 blind bends is a shared space with vehicles walkers and cyclists. Safety issues already exist despite an "impeccable" police record. Speak to the locals! Pedestrians should have priority over vehicles.

7. There are significant summation effects on infrastructure, roads, schools medical and dental facilities of H20, H14, Site 180, Chalk Pit, Scratchface Lane, H22, H40, all built or in the pipeline. Approximately 1,400 extra dwellings in a very small area. There will be loss of grade 1/2 farmland, a significant loss of green spaces affecting wildlife with increased pollution. Developing Lower Road should be a last resort development not an early release site.

[REDACTED]

9. Traffic calming measures should be considered for Brookside Road, Lower Road, Bidbury Lane, Kingscroft Lane and Mill Lane. Consider reducing the speed limit to 20mph but avoid an

engineering solution that increases street furniture which will detract from the semirural setting of the whole area.

C. On site issues.

1. The cost of removal of the shelter belt of non-native conifers which are at end of life and in a dangerous condition should be met by the developer. It is unrealistic to expect the new occupiers to meet the high cost of replanting with native species closer to development. The loss of the screen would then bring H20 directly into the setting of the CAs.
2. Why does the farmer require a farm access to the west when he already has one to all 3 remaining fields? Remove this unnecessary track from the eastern and southern side of the site.
3. There should be a full archaeological assessment of Narrow Marsh Lane as a condition prior to determination of consent. The current engineer's drawings indicate the destruction of 60% of this lane which is over 300 years old.
4. Narrow Marsh Lane should be preserved in its entirety with Public Right of Way and extension south of bridge eastward to Mill Lane.
5. The housing layout is not tight along Lower Road which will allow views into the site from Lower Road. Permitted development rights will be mostly facing south and west and thus observable from the railway, A27, A3M etc.
6. There is nothing outstanding about the housing design. The frontages of the dwellings are unremarkable and are not "place" making. This is a so called "Martini development". Anytime, anywhere, anyplace. There is nothing that will enhance the setting of the core CA or its satellite at Old manor Farm.
7. Stagnant ponds will act as a reservoir for insect borne diseases which will be an increasing threat resulting from global warming. A different solution for SUDS should be considered for the long-term.
8. The site should be designed for the future. Electric vehicle charging points should be considered for visitor bays and solar PV tiles should be standard on all appropriate roofs.
9. There will be erosion of sunken lane character of Lower Road by loss of the hedgerow for access to the site and from extended sight lines to allow a widened junction to facilitate the turning ability of large vehicles contrary to MfS. This would be more than urbanisation of a semirural lane. It would be an industrial solution which would be totally out of place.
10. Lodge Road footpath 107 too narrow and is not securely overlooked. It is not suitable as alternative route. The pavement along the south side of Bidbury Lane is not wide enough for a push chair or mobility aids.
11. Walking/cycling distances are too far and routes not safe for unsupervised (e.g. Warblington School) and thus the site unsustainable and in the wrong location. Only a One Stop shop is at walkable distance. Residents will still use their cars for a supermarket shop etc
12. Car parking on site / numerous swales (very few verges), 102 bays for 50 dwellings, is it enough for a modern young family? There is likely to be a lot of on road parking which could make access problematic. Six visitor parking bays seems woefully inadequate. Will visitors spill over into Lower Road and Brookside Road as they do now.?
13. Will nitrates be an issue? No firm guidance from central government as yet. Is there enough information to warrant deferment of the application?
14. Drainage issues around suds. Southern Water discharges into Chichester and Langstone harbours are already a regular problem.

15. There are concerns around the future management of communal areas. Contracts should ensure quality and avoid any unrealistic financial burden on residents in the future.
16. There is no hedge on the southern border of Old manor Farm to be preserved. This needs sympathetic sustainable screening.

D. Conclusion.

The design of the site does not establish a "place" and will detract from the setting of the Conservation Areas. The Heritage and Traffic reports are at best disingenuous and at worst inaccurate and misleading. There remain a number of significant issues around safety and infrastructure capacity which have not been satisfactorily addressed. This application does not meet the test that it will deliver good that will outweigh the harm it will inflict. The application should be rejected.



28th October 2019

**Land at Lower Road:
Further representations on APP/19/00427, October 2019.**

1. Introduction.

- 1.1. This submission should be read in conjunction with
 - (i) The submission I made on the 15th June 2019 (listed on the 19th June).
 - (ii) The copy of submissions made on the Draft Local Plan on behalf of Bedhampton Heritage Alliance sent to you on the 6th June 2019 (listed on the 10th June).
 - (iii) The paper related to 'Bedhampton protection of heritage assets' sent to you on 16th October 2019 (not yet listed). {See paragraphs 2 to 7 & 9 to 11}.
- 1.2. The developers have chosen to submit this application for determination within the provisions of the adopted Local Plan 2026 and the Site Allocations Plan 2014 in which the land is not allocated for development.
- 1.3. Although work is progressing on the Draft Local Plan 2036 little weight can be attached to this, particularly since strong representations have been made regarding the detrimental impact that inclusion of this site would have upon the soundness and sustainability of the Plan and these inconsistencies and failings have yet to be considered by an Inspector at an Examination in Public (EiP).
- 1.4. NPPF identifies (paragraph 194(b)) that it should be wholly exceptional to incur substantial harm to the setting of Grade II* assets. The applicants consistently have failed to recognise that this is the status of The Elms and have provided no evidence, specific to this property, of what grounds they believe justifies the impact of their proposals here. Without this *clear and convincing justification for wholly exceptional* impact the local planning authority have no basis to consider any support for the application.
- 1.5. The HBC Senior Conservation Planner in her response to a resident's email on the 10th July 2019 missed this point (the specific harm to the setting of The Elms by increasing highway safety hazards within the immediate setting). She has also failed to recognise the substantial harm to Narrow Marsh Lane within the setting of the conservation area. (3rd July 2019).
- 1.6. As a departure, it is incumbent upon the applicant to demonstrate why the proposals should be allowed in the absence of any support for them within the Plan. In other words there is a presumption **against** development unless it can be shown that there are benefits arising.

- 1.7. The Site Allocations Independent Inspector set the bar very high when she concluded that she did not support efforts by the landowner to include part of the site within the Allocations for the development of 15 houses. She concluded that any benefits would not outweigh the harm to the Conservation Area.
- 1.8. Since that time physical circumstances have not changed. There have been no changes whatsoever to the existing village, the road layout and relationships with the surrounding land that would facilitate any development here contrary to her findings, especially to enable a proposal for over 3 times more dwellings.
- 1.9. Within the material supporting the application are a number of references to 'mitigation measures'. '*Mitigation*' does not mean '*elimination*'. It means that harm has been identified and measures are proposed to try to reduce this, **if possible**. There is no case presentation to show how **any benefits at all** of the proposals might bring to the Conservation Area or the setting of The Elms (Grade II*), which is immediately within the impact zone and consequently the most vulnerable.
- 1.10. Alternatively the term '*moderated*' has been used. This means efforts to reduce excessive impact or to strive for something middling in quality or quantity. This implies the applicant accepts that there is not just harm but such harm(s) could be considered excessive and the goal is simply a half and half reduction objective. Given the duty to safeguard the heritage assets, this is not something the Local Planning Authority should condone and/or accept.
- 1.11. There is now a greater awareness and appreciation of the heritage assets set within the site and its surroundings that complement the conservation area designation. The applicant's consultants did not identify some of this. It has come to light during the consideration of the application as a result of work done by a heritage consultant appointed to carry out a review of the conservation area and records uncovered by the local historic collection. The emerging findings have been supported by expert opinion. All of which has been shared with the Council. The applicant has yet to take full cognisance of the implications and their responsibilities in this regard.
- 1.12. I will refer to the different additional submissions/revisions that have been made and comment on those matters that concern me that I believe suggest that this application should be refused.

2. Highway and Safety Matters.

- 2.1. I have examined the submission made by I-Transport dated 11th October 2019 in conjunction with resident [REDACTED] and former

[REDACTED] a resident with many years of professional experience in this arena and fully support their findings, which form separate submissions.

- 2.2. I believe that these submissions show that the location of the site has relatively poor access and, given the likely reliance upon private transport, is unsustainable. This analysis will provide material for potential evidence for the forthcoming EiP. Had it been done at the time of the draft allocation a great deal of effort might have been avoided. This provides a further reason for attaching little weight to the Draft Local Plan 2036.
- 2.3. The author claims (paragraph 2.2.2) that the modelling shows 'vanishingly small impact' (whatever that means!) and that 'there are no other measurable impacts arising'. I find this surprising and arrogant. For example, from the outset residents have expressed concerns (in the public domain) about the inevitable increase in right turns into Brookside Road that could give rise to accidents on the mini roundabout.
- 2.4. Clear evidence has been given to the Council that in the evening peak a queue of 3 waiting vehicles could wait for as much as 1 minute before being able to enter Brookside Road. This issue was raised at the Allocations EiP when the Highways Agency expressed their concerns that any accident here could impact upon the A3M. They wanted HBC and HCC to act on their behalf should this prospect re-emerge. So, why hasn't the applicant been asked to investigate this by HBC/HCC?
- 2.5. Paragraph 2.4.5 provides some confirmatory indication of the likelihood of this problem arising. Using the consultant's figures, 15 vehicles, added to the present volume turning right, could result in bunching. It is unlikely there will be an orderly 4-minute timing gap between their arrivals but, even if there was such an arrangement, the extra vehicle could arrive when others are queuing for some time.
- 2.6. This situation could arise regularly each and every weekday when the increase in westbound traffic will make finding a gap for right turns more and more difficult.
- 2.7. Throughout these highway considerations there is a clear divergence between the day by day experiences of many residents over many years and the numbers derived by the consultant's forecasts where averages are presented as the norm with no account for the unusual such as bunching, breakdowns, weather conditions and so on. The randomness of the situation on Lower Road could result in the greatest safety issues arising out of peak hours or weekdays.

- 2.8. HBC have commissioned a study of the whole highway network to see if additional development throughout the Borough can be accommodated or whether some adjustments need to be made. This has concluded that it may be necessary to change the junction to traffic lights. The study did not look at consequential impacts upon the local network.
- 2.9. Such a change would prevent right turns for vehicles exiting Brookside Road heading eastbound. A one-mile diversion would be needed through four sets of lights, with associated queues, around the A3M Broadmarsh junction. Such traffic will make 'rat run' journeys through the single carriageway limited passing places sunken lanes of Bidbury and Kingscroft Lanes with associated detrimental impact upon the character and safety of this part of the extended Conservation Area.
- 2.10. I am very surprised to see in paragraphs 2.4.7 : 2.5.2 & 5.1.bullet 4 that i-Transport suggest that HBC take the responsibility for resolving any outstanding highway problems. This is not my understanding of how the planning control system operates, or should. Each proposal should resolve its own problems. This occurs again at paragraph 3.9 when HCC are expected to pick up the task.
- 2.11. Paragraph 3.7 refers to the use of footpath 107. Living near this footpath, I can confirm that it is an unattractive long narrow passage particularly unsuitable at night and in wet weather when even using an umbrella proves difficult.
- 2.12. The present lighting provision was installed some years ago at my neighbours' request after a woman was molested. It has since been reduced in intensity by energy saving alterations. Shadow pockets created by vegetation in neighbouring gardens also impact on the attractiveness of this route. When my car was broken into the unwanted contents were found in the passage. Two blind corners provide hiding opportunities. The applicant's forecast use of this route is likely to be unfulfilled, which means greater use of the blind corners of Lower Road by either pedestrians or vehicles.
- 2.13. Widening the site access junction to accommodate occasional large vehicles will result in greater hedge loss and yet more harm eroding the character of Lower Road.
- 2.14. i-Transport have referred to the '*impeccable safety record*' of Lower Road. On the 4th July this year a resident witnessed a collision between a cyclist and car. Fortunately there was no serious injury requiring medical attention. It is unlikely that this incident, like many, here will appear upon any formal record but the existence of such a blank entry does not make this road safe. HCC have already accepted there are safety issues here and have recently introduced road markings to try to influence driver behaviour.

- 2.15. The government's "Inclusive Transport Strategy" focuses on ensuring people with disability are provided with appropriate access. In the case of Lower Road this means safe passage for those in wheelchairs and disability scooters but also those with limited mobility. Failure to do so could be in breach of The Equality Act 2010. This is particularly relevant with The Elms and The Lodge both catering for the elderly within the stretch of Lower Road concerned. The underlying message in this strategy is to provide priority care for people ahead of traffic.
- 2.16. You will see that the evidence previously gathered by residents regarding existing traffic movements is at variance with and higher than that provided by the applicants. Nevertheless using the consultant's assessment and ignoring any mathematical errors in their submission they seek to justify a low peak hour volume by suggesting a higher volume of non-vehicular movements, which is likely to increase the risk of safety conflicts. For every increased child that is taken to school by car, e.g. on wet days, there is the prospect of two additional peak hour car movements for those parents returning home. This pushes the volume close to the 100vph threshold guideline in Manual for Streets when a shared street becomes unacceptable, especially one that contains 3 blind corners: a position that could soon be exceeded during the life of the development.

3. Landscape Appraisal and Proposals:

- 3.1. Undated comments provide by the Borough Council's Landscape Architect contain a concluding contradiction. He refers to a 'successful integration' being achieved by using screening to 'detach the site from the landscape character of Bedhampton'. It therefore does **not** integrate it creates a visual intrusion into the setting of the Conservation Area.
- 3.2. He makes no mention of the overall harmful impact upon the historic landscape surrounding the conservation area. Nor does he take account of the sunken lane character of Lower Road and the harm to the historic hedgerow: a loss of 11.5m for the access and 30m 'lost' at the eastern end.
- 3.3. The latest landscape drawings (1860-TF-00-oo-DR-L-1005) show a grassed footpath as the replacement for Narrow Marsh Lane. Much of the issues regarding the harm to Narrow Marsh Lane has been dealt with elsewhere (see paragraph 1.1.(iii) above) but this proposed surface treatment bears no resemblance to the present historic character of the Lane.
- 3.4. There are also errors on the layout plan that suggest that the author has not even visited the site or examined the survey produced by

MJA Consulting. This shows that there is **no** 'existing hedging retained' south of the Old Manor Farm buildings. The survey rightly identifies brambles and nettles here!

- 3.5. It is proposed to remove the alien shelterbelt. The position of this line of trees has no historical significance. It was planted within living memory to serve a temporary use of the land. Its early removal for safety reasons makes sense. It will, at least in the short term, restore the open coastal setting of the conservation area and reinforce the case against any development here.
- 3.6. However to replace it with a line of trees further to the east for the purposes of screening the proposals will put some distance between these trees and the development they are intended to screen with public access in the space in between. This space might also be increased in order to retain the whole of Narrow Marsh Lane in its historic location.

4. Heritage Assets:

- 4.1. The author of the Consultant's Heritage Statements issued by Terence O'Rourke Ltd would appear to be an archaeologist; member of the Chartered Institute for Archaeologists. Whilst he might be forgiven for overlooking the archaeological significance of Narrow Marsh Lane in the original heritage statement, there seems to be no reason whatsoever why he has failed to identify this in the addendum given the amount of material now available in the public domain regarding this as a result of the Conservation Area Review.
- 4.2. As a Chartered Archaeologist the starting point of his duty is to protect such remains and to explore every avenue to do so to ensure that they are not needlessly destroyed. This he has singularly failed to do.
- 4.4. Paragraph 3.4 of the addendum asserts

"The layout of the development has been amended from that originally submitted to ensure the alignment of the historic track is wholly within the open landscape area and is left free of development. Although not presently a public right of way the amended site layout ensures that this section of the historic route is preserved."

- 4.5. [REDACTED]
[REDACTED] The survey drawing (5992:PO1 B) makes clear that the proposed footpath is much narrower than the historic public thoroughfare Lane and much of it (50%) does not fall within the boundaries of the Lane.
- 4.6. A similar misrepresentation is contained in Luken Beck's letter dated 27th September 2019

- 4.7. I have supplied an extract of this drawing to the case officer (delivered by hand) on which I have shown the above variations that confirm that 2/3rds of the Lane will not be preserved.
- 4.8. No mention is made of compliance with NPPF paragraph 189 related to archaeology that states that,

"Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation."

- 4.9. I have set out in my paper 'Bedhampton protection of heritage assets' (1.1.(iii) above) that I do not think this can be appropriately dealt with by planning condition linked to a consent for a layout that detrimentally impacts upon the asset and prejudices its safeguarding.
- 4.10. The setting to the west of the Old Manor Farm buildings is described (paragraph 3.3) as remaining in agricultural use. A site visit reveals that this is currently derelict land following unauthorised use. So no part of these buildings retain their link with the land with which they were once associated. No account has been taken of the HBC decision to create a satellite conservation area here which should have its own setting to protect and enhance. This is not being done.
- 4.11. Paragraph 4.4 of the addendum suggests that the Planning Design and Access Statement includes consideration of the public benefits of the proposals. No changes have been made to the PDAS and it does not contain anything to this effect.

5. The amended proposals.

- 5.1. I can see no reason why there is a need for a farm access through the site to gain access to land to the west when an access can already be gained from Lower Road to this land. It is an unsustainable use of a significant amount of land. It also poses an intrusive safety threat to the users of the play area and open space.
- 5.2. Removal of the farm access will provide an opportunity to provide more planting, acceptable to National Rail, to screen the backs of the dwellings to views from the railway. An alternative would be to re-orientate the dwellings to face outwards as part of a revised layout.
- 5.3. A revised layout is needed to better respect and protect the heritage asset of Narrow Marsh Lane and the setting of the Old Manor Farm buildings.

- 5.4. The layout is meant to reflect the existing layout of dwellings on the north side of Lower Road. These are however close knit with few small gaps. They screen development behind them. The proposal has intentional gaps to allow views into the site. Thus the visual impact and intrusion will be increased especially in the panorama when approaching down Lodge Road.
- 5.5. The house types are unimaginative. They are not innovative. They provide no real contribution to place making. Their design adds nothing to the setting of the Conservation Area. Their style dates from the mid 20th Century not the 21st. They are made up of simple box shapes with little adornment or variation. Adornment is limited solely to bracketed or post supported canopies. Windows with 'mock Georgian' window bars are a dated solution that has no relationship with the scale and proportions of the dwellings.
- 5.6. They compare very unfavourable with the architecture of recent developments elsewhere in the Borough. One house type even has a chimney on the opposite side to the lounge (Type HA). This sloppiness and a lack of existing site appreciation suggests a lack of attention to detail.
- 5.7. There are significant areas of common spaces and planting to be maintained. Management companies are proving to be an unsatisfactory way to undertake this task. If this fails here the surrounding existing development is likely to experience a deterioration in the visual intrusion created by the development as a result of the screening and hedge maintenance regime being neglected.
- 5.8. Other than providing some housing there are no other benefits arising from this proposal, which may explain the lack of any attempt to identify them in the PDAS.
- 5.9. There are however likely to be many harms arising: Entry to Brookside Road, Traffic through the Conservation Area, Traffic and safety issues through the blind bends and impact upon The Elms, rat runs through Bidbury and Kingscroft Lanes, erosion of the Lower Road hedgerow, the loss of Narrow Marsh Lane, designs that are dated in concept and execution.

6. Conclusion.

- 6.1. Nothing in the revised submission convinces me to change my mind in support of the development. Indeed there is much to further convince me that this development should be refused.
- 6.2. Following refusal I believe that the Local Planning Authority should review the suitability of this location for development and remove it from the Draft Local Plan.

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colleague Paul Denyer, a resident with many years of professional experience in this arena and fully support their findings, which form separate submissions.

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- 2.7. Throughout these highway considerations there is a clear divergence between the day by day experiences of many residents over many years and the numbers derived by the consultant's forecasts where averages are presented as the norm with no account for the unusual such as bunching, breakdowns, weather conditions and so on. The randomness of the situation on Lower Road could result in the greatest safety issues arising out of peak hours or weekdays.

- 2.8. HBC have commissioned a study of the whole highway network to see if additional development throughout the Borough can be accommodated or whether some adjustments need to be made. This has concluded that it may be necessary to change the junction to traffic lights. The study did not look at consequential impacts upon the local network.
- 2.9. Such a change would prevent right turns for vehicles exiting Brookside Road heading eastbound. A one-mile diversion would be needed through four sets of lights, with associated queues, around the A3M Broadmarsh junction. Such traffic will make 'rat run' journeys through the single carriageway limited passing places sunken lanes of Bidbury and Kingscroft Lanes with associated detrimental impact upon the character and safety of this part of the extended Conservation Area.
- 2.10. I am very surprised to see in paragraphs 2.4.7 : 2.5.2 & 5.1.bullet 4 that i-Transport suggest that HBC take the responsibility for resolving any outstanding highway problems. This is not my understanding of how the planning control system operates, or should. Each proposal should resolve its own problems. This occurs again at paragraph 3.9 when HCC are expected to pick up the task.
- 2.11. Paragraph 3.7 refers to the use of footpath 107. Living near this footpath, I can confirm that it is an unattractive long narrow passage particularly unsuitable at night and in wet weather when even using an umbrella proves difficult.
- 2.12. The present lighting provision was installed some years ago at my neighbours' request after a woman was molested. It has since been reduced in intensity by energy saving alterations. Shadow pockets created by vegetation in neighbouring gardens also impact on the attractiveness of this route. When my car was broken into the unwanted contents were found in the passage. Two blind corners provide hiding opportunities. The applicant's forecast use of this route is likely to be unfulfilled, which means greater use of the blind corners of Lower Road by either pedestrians or vehicles.
- 2.13. Widening the site access junction to accommodate occasional large vehicles will result in greater hedge loss and yet more harm eroding the character of Lower Road.
- 2.14. i-Transport have referred to the '*impeccable safety record*' of Lower Road. On the 4th July this year a resident witnessed a collision between a cyclist and car. Fortunately there was no serious injury requiring medical attention. It is unlikely that this incident, like many, here will appear upon any formal record but the existence of such a blank entry does not make this road safe. HCC have already accepted there are safety issues here and have recently introduced road markings to try to influence driver behaviour.

- 2.15. The government's "Inclusive Transport Strategy" focuses on ensuring people with disability are provided with appropriate access. In the case of Lower Road this means safe passage for those in wheelchairs and disability scooters but also those with limited mobility. Failure to do so could be in breach of The Equality Act 2010. This is particularly relevant with The Elms and The Lodge both catering for the elderly within the stretch of Lower Road concerned. The underlying message in this strategy is to provide priority care for people ahead of traffic.
- 2.16. You will see that the evidence previously gathered by residents regarding existing traffic movements is at variance with and higher than that provided by the applicants. Nevertheless using the consultant's assessment and ignoring any mathematical errors in their submission they seek to justify a low peak hour volume by suggesting a higher volume of non-vehicular movements, which is likely to increase the risk of safety conflicts. For every increased child that is taken to school by car, e.g. on wet days, there is the prospect of two additional peak hour car movements for those parents returning home. This pushes the volume close to the 100vph threshold guideline in Manual for Streets when a shared street becomes unacceptable, especially one that contains 3 blind corners: a position that could soon be exceeded during the life of the development.

3. Landscape Appraisal and Proposals:

- 3.1. Undated comments provide by the Borough Council's Landscape Architect contain a concluding contradiction. He refers to a 'successful integration' being achieved by using screening to 'detach the site from the landscape character of Bedhampton'. It therefore does **not** integrate it creates a visual intrusion into the setting of the Conservation Area.
- 3.2. He makes no mention of the overall harmful impact upon the historic landscape surrounding the conservation area. Nor does he take account of the sunken lane character of Lower Road and the harm to the historic hedgerow: a loss of 11.5m for the access and 30m 'lost' at the eastern end.
- 3.3. The latest landscape drawings (1860-TF-00-oo-DR-L-1005) show a grassed footpath as the replacement for Narrow Marsh Lane. Much of the issues regarding the harm to Narrow Marsh Lane has been dealt with elsewhere (see paragraph 1.1.(iii) above) but this proposed surface treatment bears no resemblance to the present historic character of the Lane.
- 3.4. There are also errors on the layout plan that suggest that the author has not even visited the site or examined the survey produced by

MJA Consulting. This shows that there is **no** 'existing hedging retained' south of the Old Manor Farm buildings. The survey rightly identifies brambles and nettles here!

- 3.5. It is proposed to remove the alien shelterbelt. The position of this line of trees has no historical significance. It was planted within living memory to serve a temporary use of the land. Its early removal for safety reasons makes sense. It will, at least in the short term, restore the open coastal setting of the conservation area and reinforce the case against any development here.
- 3.6. However to replace it with a line of trees further to the east for the purposes of screening the proposals will put some distance between these trees and the development they are intended to screen with public access in the space in between. This space might also be increased in order to retain the whole of Narrow Marsh Lane in its historic location.

4. Heritage Assets:

- 4.1. The author of the Consultant's Heritage Statements issued by Terence O'Rourke Ltd would appear to be an archaeologist; member of the Chartered Institute for Archaeologists. Whilst he might be forgiven for overlooking the archaeological significance of Narrow Marsh Lane in the original heritage statement, there seems to be no reason whatsoever why he has failed to identify this in the addendum given the amount of material now available in the public domain regarding this as a result of the Conservation Area Review.
- 4.2. As a Chartered Archaeologist the starting point of his duty is to protect such remains and to explore every avenue to do so to ensure that they are not needlessly destroyed. This he has singularly failed to do.
- 4.4. Paragraph 3.4 of the addendum asserts

"The layout of the development has been amended from that originally submitted to ensure the alignment of the historic track is wholly within the open landscape area and is left free of development. Although not presently a public right of way the amended site layout ensures that this section of the historic route is preserved."

- 4.5. This is completely misleading and untrue. The author is either behaving unprofessionally or incompetently. The survey drawing (5992:PO1 B) makes clear that the proposed footpath is much narrower than the historic public thoroughfare Lane and much of it (50%) does not fall within the boundaries of the Lane.
- 4.6. A similar misrepresentation is contained in Luken Beck's letter dated 27th September 2019

- 4.7. I have supplied an extract of this drawing to the case officer (delivered by hand) on which I have shown the above variations that confirm that 2/3rds of the Lane will not be preserved.
- 4.8. No mention is made of compliance with NPPF paragraph 189 related to archaeology that states that,

"Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation."

- 4.9. I have set out in my paper 'Bedhampton protection of heritage assets' (1.1.(iii) above) that I do not think this can be appropriately dealt with by planning condition linked to a consent for a layout that detrimentally impacts upon the asset and prejudices its safeguarding.
- 4.10. The setting to the west of the Old Manor Farm buildings is described (paragraph 3.3) as remaining in agricultural use. A site visit reveals that this is currently derelict land following unauthorised use. So no part of these buildings retain their link with the land with which they were once associated. No account has been taken of the HBC decision to create a satellite conservation area here which should have its own setting to protect and enhance. This is not being done.
- 4.11. Paragraph 4.4 of the addendum suggests that the Planning Design and Access Statement includes consideration of the public benefits of the proposals. No changes have been made to the PDAS and it does not contain anything to this effect.

5. The amended proposals.

- 5.1. I can see no reason why there is a need for a farm access through the site to gain access to land to the west when an access can already be gained from Lower Road to this land. It is an unsustainable use of a significant amount of land. It also poses an intrusive safety threat to the users of the play area and open space.
- 5.2. Removal of the farm access will provide an opportunity to provide more planting, acceptable to National Rail, to screen the backs of the dwellings to views from the railway. An alternative would be to re-orientate the dwellings to face outwards as part of a revised layout.
- 5.3. A revised layout is needed to better respect and protect the heritage asset of Narrow Marsh Lane and the setting of the Old Manor Farm buildings.

- 5.4. The layout is meant to reflect the existing layout of dwellings on the north side of Lower Road. These are however close knit with few small gaps. They screen development behind them. The proposal has intentional gaps to allow views into the site. Thus the visual impact and intrusion will be increased especially in the panorama when approaching down Lodge Road.
- 5.5. The house types are unimaginative. They are not innovative. They provide no real contribution to place making. Their design adds nothing to the setting of the Conservation Area. Their style dates from the mid 20th Century not the 21st. They are made up of simple box shapes with little adornment or variation. Adornment is limited solely to bracketed or post supported canopies. Windows with 'mock Georgian' window bars are a dated solution that has no relationship with the scale and proportions of the dwellings.
- 5.6. They compare very unfavourable with the architecture of recent developments elsewhere in the Borough. One house type even has a chimney on the opposite side to the lounge (Type HA). This sloppiness and a lack of existing site appreciation suggests a lack of attention to detail.
- 5.7. There are significant areas of common spaces and planting to be maintained. Management companies are proving to be an unsatisfactory way to undertake this task. If this fails here the surrounding existing development is likely to experience a deterioration in the visual intrusion created by the development as a result of the screening and hedge maintenance regime being neglected.
- 5.8. Other than providing some housing there are no other benefits arising from this proposal, which may explain the lack of any attempt to identify them in the PDAS.
- 5.9. There are however likely to be many harms arising: Entry to Brookside Road, Traffic through the Conservation Area, Traffic and safety issues through the blind bends and impact upon The Elms, rat runs through Bidbury and Kingscroft Lanes, erosion of the Lower Road hedgerow, the loss of Narrow Marsh Lane, designs that are dated in concept and execution.

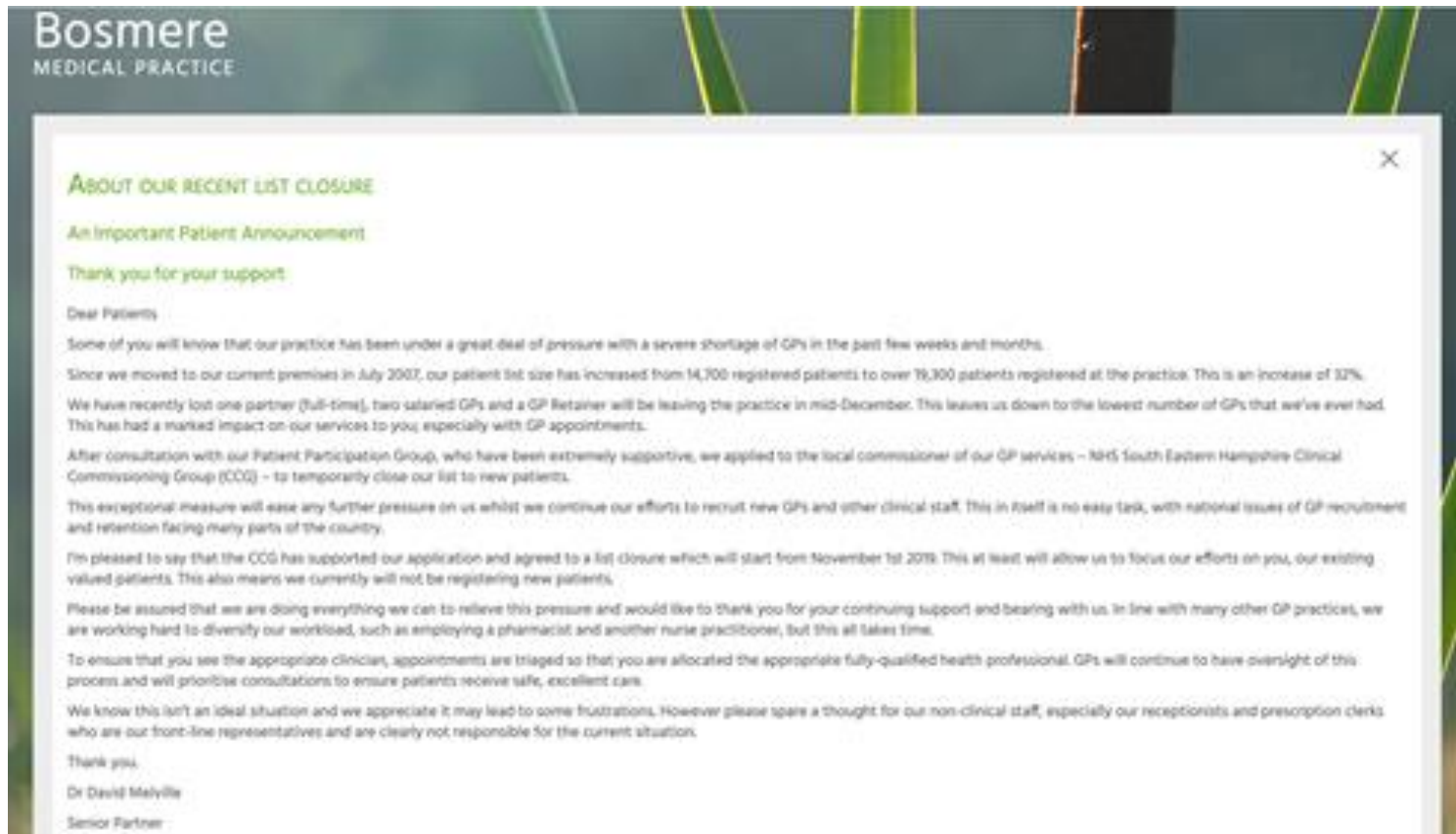
6. Conclusion.

- 6.1. Nothing in the revised submission convinces me to change my mind in support of the development. Indeed there is much to further convince me that this development should be refused.
- 6.2. Following refusal I believe that the Local Planning Authority should review the suitability of this location for development and remove it from the Draft Local Plan.

Dear Daphney,

Please register this as evidence against APP/19/00427 being allowed to progress. This is another example of the current infrastructure under strain.

Yours,



Bosmere
MEDICAL PRACTICE

ABOUT OUR RECENT LIST CLOSURE

An Important Patient Announcement

Thank you for your support

Dear Patients

Some of you will know that our practice has been under a great deal of pressure with a severe shortage of GPs in the past few weeks and months.

Since we moved to our current premises in July 2007, our patient list size has increased from 14,700 registered patients to over 16,300 patients registered at the practice. This is an increase of 32%.

We have recently lost one partner (full-time), two salaried GPs and a GP Retainer will be leaving the practice in mid-December. This leaves us down to the lowest number of GPs that we've ever had. This has had a marked impact on our services to you, especially with GP appointments.

After consultation with our Patient Participation Group, who have been extremely supportive, we applied to the local commissioner of our GP services – NHS South Eastern Hampshire Clinical Commissioning Group (CCG) – to temporarily close our list to new patients.

This exceptional measure will ease any further pressure on us whilst we continue our efforts to recruit new GPs and other clinical staff. This in itself is no easy task, with national issues of GP recruitment and retention facing many parts of the country.

I'm pleased to say that the CCG has supported our application and agreed to a list closure which will start from November 1st 2019. This at least will allow us to focus our efforts on you, our existing valued patients. This also means we currently will not be registering new patients.

Please be assured that we are doing everything we can to relieve this pressure and would like to thank you for your continuing support and bearing with us. In line with many other GP practices, we are working hard to diversify our workload, such as employing a pharmacist and another nurse practitioner, but this all takes time.

To ensure that you see the appropriate clinician, appointments are triaged so that you are allocated the appropriate fully-qualified health professional. GPs will continue to have oversight of this process and will provide consultations to ensure patients receive safe, excellent care.

We know this isn't an ideal situation and we appreciate it may lead to some frustrations. However please spare a thought for our non-clinical staff, especially our receptionists and prescription clerks who are our front-line representatives and are clearly not responsible for the current situation.

Thank you.

Dr David Melville
Senior Partner

F.A.O. Daphney Haywood, Case Officer App/19/00427

With regards to Planning Application App/19/00427, having read the i-Transport reports and the recently published Hampshire County Council (HCC) response (Ref: 6/3/13/182 dated 14th Nov 2019), I wish to register my disappointment and submit the following objections aimed specifically at HCC's response:

1. The Increased Traffic levels will create an Increased Danger on the Shared Road Section

The only access to this proposed new development is through the conservation area via Lower Road which is narrow with two very sharp bends and **no pavement**. The 50 new houses (and up to 100 additional vehicles) will create a significant increase in traffic on the narrow, shared spaces with treacherous blind bends and will cause a very real increased risk to everyone who uses the road. This aspect has been totally disregarded by HCC. The statement made in the developers' proposal of 'impeccable safety record' is entirely misleading and inaccurate. The increased traffic levels on this road, shown in the picture below, will create a higher level of danger to users.



Walker's, cyclists, school children, parents with prams, horse riders along with the disabled and elderly will all be put in greater danger. The road simply cannot support the increase in traffic that this development would bring. It would just be a case of an accident waiting to happen. Any additional traffic (pedestrians, vehicles, cyclists, mobility scooters etc.) will obviously increase the danger presented to all users in the shared space. The safety of the additional children predicted within the proposed site has not been accounted for when using the shared space for school or recreation. The report from i-Transport has stated that Lower Road already has high levels of pedestrians and cyclists and this has also been disregarded by HCC.

2. The Blind Bend Near Misses have not taken into account

As a resident, I can assure you that I have had many near misses on the Lower Road blind bends both day and night, and have taken evasive action on many occasions to avoid Cyclists and Vehicles over the last 14 years, even at only 15 miles an hour. The local residents Near Miss statements have already been sent to HBC and a recent accident on this section has also been reported to HBC. The HCC response is unsympathetic on this issue and a Freedom Of Information email from Peter Marshall to David Hayward sent on 24th May 2018 at 11:42 sums up the attitude from HCC in the quote shown below:

"Yes we engineers never take any notice of "It's an accident waiting to happen" until we get an accident!"

From: Marshall, Peter Sent: 24 May 2018 11:42 To: Hayward, David <david.hayward@havant.gov.uk>

HCC's flippant statement above on the safety concerns of local residents is unacceptable and one I trust HBC will not support.

3. No visibility calculations provided for both sides of the Lower Road blind bends

The developer has not provided full corner visibility calculations for both sides of the Lower Road blind bends which would highlight the problem encountered for all users of this road and has been disregarded by HCC.

4. The limited Road accident data provided is out of date

The road accident data provided within the planning proposal is from May 2011 to April 2016. This is now well over three years out of date and hasn't been addressed by HCC.

5. Incorrect calculations provided on Shared Road collisions

The proposal contains a Shared Road collision figure of 0.056% (Para 6.8.8) which is complete nonsense. The chances of a pedestrian/cyclist meeting a car at 04:00 is very low but what is the probability half an hour either side of 08:30 or 16:30? The maths is incorrect (0.056% is 56 in 100,000) and should be corrected prior to granting any planning permission. What else is incorrect within the planning submission and has also been disregarded by HCC?

6. Safety issue created by increased traffic along Kingscroft Lane

The increased traffic will add to the flow of traffic through the narrow Kingscroft Lane as driver behaviour will look for alternative routes to avoid queuing at the top of Brookside. This will inevitably create additional safety problems adjacent to the Bidbury Mead recreational area which is now within the Conservation Area. This safety concern has not been addressed by HCC.

7. Detrimental effect on already congested nearby Roads

The adjoining road of Bedhampton Hill is already a very well-used road as it provides access to/from the A3 and A27. Traffic often queues in all directions from the mini roundabout, and often leading all the way back to the 'Rusty Cutter' roundabout. Please see the picture below, taken during the rush hour this week, of gridlock on the 'Rusty Cutter' roundabout due to queues along the Bedhampton Hill road.



The approved plans for Forty Acres will add to this congestion and only make the situation even worse. This aspect has been reported as "resulting in 1 additional movement every 4 minutes across the peak hours" and has clearly not been addressed properly and has therefore been disregarded by HCC.

8. The neglect of exit traffic effects on the mini roundabout

There is no assessment for the mini roundabout / Brookside Road entrance in the light of possible changes to the mini roundabout. The mini roundabout prior to turning right into Brookside Road from the West approach can become grid locked when too many cars are waiting to enter Brookside Road due to the extremely short distance allocated for cars to wait as seen in the photograph below:



The proposal is missing how the additional "right turn" traffic from Brookside Road will affect the mini roundabout which will have a significant impact on all road users. This has been conveniently disregarded by HCC?

9. The mini roundabout traffic incidents are not referred to in the proposal

The reported traffic incidents on the mini roundabout on the exit to Brookside Road are not referred to in the proposal. There have been a number of incidents on the mini roundabout which have been conveniently omitted from the development proposal and have been disregarded by HCC. The increase in traffic levels due to the proposed development will certainly add pressure to the mini roundabout and cause increased accident levels.

10. Alternative Lodge Road footpath is not a viable option

Using the Lodge Road footpath as an alternative to using the Lower Road bends is not a suitable alternative. It is too narrow for Motability scooters and prams to pass. You can't see the far end of the footpath from either end and it is very intimidating for pedestrians. Some pictures are provided below to highlight the limited illumination provided on this footpath.



Natural human behaviour would be to take the shortest route, which is via the Lower Road shared space. The footpath would remain unused and to suggest it as a viable option within the mitigation to avoid the dangerous sections of Lower Road is irresponsible and inaccurate. HCC seem unconcerned about resident's personal safety on this subject.

11. Increased cyclists and pedestrians along Lower Road from the recently approved Forty Acre site

Due to the Forty Acre site planning application being approved, additional pedestrians and cyclists will utilise Lower Road. Human nature will lead people to use the shortest route regardless of any mitigation put in place and this aspect has not been considered.

12. Lower Road is liable to flooding which creates a danger

Lower Road is liable to flooding due to blocked drains which I have cleared many times in the past. Also, when snow falls the road becomes very dangerous to navigate and takes a long time to clear due to the shade effect of the nearby trees. This aspect has not been considered either.

13. The proposal neglects the state of the pathways near the blind bends

The pathways leading to the blind bends are in poor condition and users find them difficult to navigate, especially the elderly and disabled. The paths are narrow and not suitable for wheelchairs, buggies or mobility scooters which are then forced to use the road. The pathway leading to the corner by the Elms is shown below:



The absence of any pathways between the bends creates safety problems for pedestrians and passing vehicles which HBC and HCC have already acknowledged but the poor condition of the leading pathways has been neglected.

14. Inadequate response provided by i-Transport to the Road Safety Concerns

The revised traffic predictions and response to HCC questions is inadequate and condescending. The cavalier attitude to the serious safety concerns raised is unprofessional and their attitude to the clarification responses requested are dismissive in their reasoning. Unfortunately, HCC have just taken the information provided as correct even though evidence that contradicts some of the data has been provided to HCC.

In summary, the residents safety related objections raised above have not been adequately assessed by HCC and some concerns have been completely dismissed. I strongly object to the method in which HCC have dealt with the safety concerns and hope this flawed and poor-quality planning application is again reviewed in the professional manner expected before any decision is reached. Please add this objection to the Planning Application Documents within APP/19/00427.

Please can you acknowledge receipt of this objection.

Regards

1. Introduction:

- 1.1. Now that work on the Conservation Area Review has been completed HBC will commence work on the strategy and programme for safeguarding and enhancing the heritage assets identified in the heritage consultants report. Comments will be sent separately regarding Bidbury Mead, Bedhampton Road and the Portsmouth Water Company land.
- 1.2. It is also important to take stock regarding the future of those identified heritage assets that were not considered appropriate for inclusion within the new conservation area boundaries on the basis that HBC felt that either they fell below national importance or they were inappropriate for inclusion. Nevertheless, they lie within the setting of the conservation area for which the local planning authority still has a duty to safeguard. Moreover, as heritage assets in themselves, HBC has a duty to safeguard.
- 1.3. The current planning application south of Lower Road (Ref 19/00427), directly and indirectly, affects some of these explored below.
- 1.4. The Bedhampton Heritage Alliance firmly believe that the most appropriate way to safeguard and enhance the setting of the conservation area is to remove the non-native shelterbelt and restore the open rural coastal landscape setting. Nothing below should be interpreted as support for development south of Lower Road.

2. Sunken Lane:

- 2.1. Lower Road was not included but is recognised as having a 'sunken lane' character that forms part of a recognised extended network of such lanes much of which (Kingscroft and Bidbury Lanes) has now been included within the Conservation Area. The considerable extent of this network is unique within the Borough and its presence adds much to the character of the Conservation Area and its setting. This part of the public realm is where the local authorities, HCC and HBC, can have most impact upon the quality of the environment.
- 2.2. Lower Road has a more mixed urban and rural sunken character than the rest of the network. The provision of accesses to development on the north side of the road was felt by HBC to have had a sufficiently detrimental impact on the continuity of the earth bank that, when compared to examples elsewhere outside the Borough, this part of 'the sunken lane' network did not justify its inclusion as an extension to the Conservation Area. So here is an area with a recognised character (albeit not outstanding) where anything that further erodes this environmental feature throughout its length will be detrimental to the setting of the Conservation Area.
- 2.3. In the light of this, should the proposed development south of the road result in road widening or footpath provision affecting the north side, this should be resisted/prevented to safeguard the setting of the Conservation Area. This approach should apply throughout the length of the road and include whatever control might be exercised by HCC

- and HBC over the loss of the bank and increasing the width of driveways.
- 2.4. Lower Road from number 14 westwards has only very limited stretches of footpath at the entrance to Lodge Road. This sharing of the carriageway adds to its character, albeit also increases safety hazards. The raised hedging and narrow verge are part of the 'sunken lane' character on the south side. Given the absence of development here, this also gives the setting of the Conservation Area its rural character. Any loss of hedging and verge will detract from this character.
 - 2.5. The removal of any hedging especially to provide access to any development site, together with sight lines, will erode this amenity. Likewise any footpath introduction along the southern verge outside the site will urbanise the appearance of the road to the detriment of the setting of the Conservation Area.
 - 2.6. The addition of signage and road markings to introduce new traffic management measures will also erode the existing character creating a more urban and cluttered appearance. Road narrowing to provide sightlines for the entrance to the development site will increase safety concerns for pedestrians using the carriageway where no pavements exist and detract from the enjoyment of visitors to the conservation area to and from this direction.

3. Narrow Marsh Lane:

- 3.1. Heritage experts have agreed that Narrow Marsh Lane almost certainly existed in medieval times. One has also strongly suggested (supported by another) that its origins as a significant route to and from Langstone Harbour may have been established in pre-historic times.
- 3.2. One significant contributing factor to its pre-historic origins is a study of the historic landscape where the presence of, and obstacle to, driving routes created by Portsdown Hill dominate communications. This is a relationship that can still be understood today.
- 3.3. Seasonal access between the riches of the harbour and coastal salt marshes and the resources of the Forest of Bere would have been inhibited coming from the west until reaching the eastern end of the ridge and similarly coming from the east this would have presented the last opportunity to move north of the hill.
- 3.2. The meeting point of these east-west and north-south routes would have lain at the northern end of Narrow Marsh Lane and the expert opinion believes that it is likely to have become the very first location where early settlement would have taken place.
- 3.3. Once the flows of the many spring water sources had begun to be controlled by collective actions more permanent development sites could be identified leading to the eventual later foundation of the village core to the east of this meeting point. So this lane could mark one of the earliest places where the origins of the Borough began.
- 3.4. An archaeological study of both the Broadmarsh section in Langstone Harbour and north of the railway bridge may reveal the nature of the construction and maintenance of the lane, the materials used and their likely source, as well as confirm its age and therefore the duration of its

heritage significance. Unlike Mill Lane, which, over time, is likely to have had much reconstruction, Narrow Marsh Lane is unlikely to have had much alteration over time.

4. Post-Medieval existence and status?

- 4.1. Regardless of any pre-historic significance, this route to/from the harbour was severed by the 19th century introduction of the railway.
- 4.2. The relatively flat landform enabled the majority of this construction on the basis of level crossings at the many road intersections. Both Mill Lane and Narrow Marsh Lane were however notably provided with bridge crossings even though they were not in a cutting. This suggests they were considered much more important than other crossings along the route despite that these other places are likely to have had much more surrounding development at that time.

5. Need for research:

- 5.1. More research of historic records and the findings of a detailed archaeological examination of Narrow Marsh Lane may, in combination, reveal more.
- 5.2. The local list can be used to identify significant local archaeological heritage assets. Research could provide the basis for a decision by HBC to safeguard and include both sections of the Lane on the local list.

6. A safeguarding strategy:

- 6.1. In considering the impact of development proposals on archaeological heritage assets best practice suggests, *"In particular, care must be taken to ensure that archaeological remains are not needlessly or thoughtlessly destroyed."* The current planning application originally totally destroyed the northern section of the lane, approximately half by buildings and the rest by landscape works.
- 6.2. The applicants landscape appraisal and heritage statements did not address this in any way. No account was given of what thought had been given to alternatives? This is a large site capable of many alternative layouts that would needlessly avoid such loss of heritage. The local planning authority should not accept any layout that destroys the Lane.
- 6.3. A recent revised proposed layout plan suggests the retention of a narrow footpath along the line of the Lane at the immediate boundary of the housing. The amended heritage statement by O'Rourke (paragraph 3.4) is both misleading and untrue. Whilst this amendment is at least an acknowledgement of this heritage asset, it fails to properly provide for proper safeguarding.
- 6.4. Examination of the 'Drainage Strategy Layout' (Ref 5992:PO1) provided by MJA Consulting shows the proposal superimposed upon a surveyed base. The proposed narrow footpath is half the width of the Lane. It will provide 60% less public thoroughfare. Approximately

2/3rds of the Lane will be lost/destroyed. 50% of the replacement footpath is outside the parameters of the Lane.

- 6.5. The proposal seeks to rewrite history in an irresponsible and misleading way.

7. How to exercise planning control:

- 7.1. Guidance recognises that archaeological remains can contain irreplaceable information about our past and the potential for an increase in future knowledge. They are part of our sense of identity and are valuable both for their own sake and for their role in education, leisure and tourism.
- 7.2. The County Archaeologist has suggested a planning condition to collect what knowledge exists before development commences but, if this condition is linked to consent for any layout that destroys or limits the extent of the Lane immediately the knowledge has been gathered, it provides no protection for this heritage asset even if the findings confirm its considerable significance within the history of the origins of the Borough. The wider cultural benefits identified above will be lost.
- 7.3. This suggests that no planning consent be granted for **any** layout that will result in harm to any part of this heritage until investigations are complete especially in the absence of any appraisal of the type suggested/required in paragraphs 6.1 & 6.2 above.

8. Right of Way:

- 8.1. Although no one registered it as a public right way when RoW provisions were introduced, from the historic records, there can be no doubt that Narrow Marsh Lane was a well-used public thoroughfare throughout the centuries. It was only within its recent history that the landowner blocked it off. Measures are currently being taken to seek to remedy this status.
- 8.2. It may be obvious to state that retention of the Lane will incur no harm to it. So too will designation as a right of way and adding it to the local list.

9. Manor Farm Buildings:

- 9.1. The Manor Farm buildings are being included in the Conservation Area as a 'satellite' location. The relationship between them and the open farmland they are associated with is obliterated by the current development proposals.
- 9.2. They indicate "existing hedge retained" where no such hedge exists. Brambles and nettles alone provide the 'landscape' of the southern edge and open setting of these buildings. Proposed mitigation is limited to a narrow strip of landscape for an undefined purpose that could lead to nuisance and a reduction in the height of nearby proposed dwellings. Revision of the layout and retaining an open setting in some planned and usable form would better safeguard these heritage assets.

10. Trees and screening:

- 10.1. It is now recognised that the shelterbelt, that might have given rise to the local plan proposal to develop land to the west, based upon a poor quality landscape appraisal, is not fit for purpose, is dangerous and needs to be felled as soon as possible. The proposals are to replace it but this will take some time to mature to screen the intrusive development. Dealing with this may fall to the residents as part of the arrangements for ongoing maintenance of common areas. This could severely test such arrangements.
- 10.2. The early removal of the shelterbelt will temporarily enhance the setting of the conservation area by restoring the openness. It will also provide safety for those using the Lane.
- 10.3. The proposals have no landscape screening proposed for the western and southern boundaries of the housing. National Rail may oppose anything on the southern boundary that is likely to create problems on the railway. Thus views of the setting of the conservation area from the south and west from both road and rail will be exposed to the intrusive nature of the development in the foreground. The views will also be subject to the vagaries of permitted development rights being exercised to the rear of the dwellings along these boundaries adding to the intrusive nature of the development.
- 10.4. The many people experiencing such views are likely to vastly outstrip those visiting the conservation area. The reputation of Bedhampton as a place to visit to enjoy its rich heritage will be diminished by these images.

11. Harm versus benefits?

- 11.1. It may be already apparent that the benefits of the proposed development, if any, do not outweigh the harm they do to the heritage assets surrounding this area. The above issues and impacts may simply demonstrate this and add weight in support of and in conjunction with other reasons for refusal, such as highway capacity and safety concerns.
- 11.2. A refusal may clearly demonstrate to the authority how this site is no longer suitable for development of this, or any reduced, scale. It is not too late to remove the site from the draft Local Plan 2036.

Sent: 27 November 2019 17:04

Subject: Re: Objections to planning application App/19/00427 relating to HCC Response Ref: 6/3/13/182 dated 14thNov19

To Daphney Haywood

Please take note of the picture below, taken today, of the regular flooding that occurs on Lower Road at the exit of the blind bends.

This water can be up to 30cm in depth and is very dangerous for cyclists using the road. I briefly lost control of my car when going through the flood and would like you to add this photographic evidence in support my recent objection about the safety concerns raised with increased traffic levels if the planning application is approved.



Regards