

H20: Vehicle Access to H20 via Brookside and Lower Road

The Bedhampton Historical Collection actively encourages visitors, educational visits and walking groups to the Bedhampton Conservation Area supporting the Havant Borough Council Delivery Strategy 2.37: 'The Council will continue its guardianship of the Borough's heritage assets so that their contribution to sense of place and educational value is safeguarded for future generations'.

H20 is in Conflict with The Conservation Area.

Access to the proposed H20 site from Brookside is through one of the most important Conservation Areas in the Borough. The Conservation Area contains 8 Grade II Listed properties, including '*The Elms*' that is Grade II* Listed, putting it within the top 8% of Listed properties within the UK.

The impact of developing H20 will irreversibly damage the historic setting of the Conservation Area.

Any Highways or Local Authority intervention to add highway signage or build paved areas as pedestrian refuges will damage the integrity and spirit of the Conservation Area.

H20 straddles *Narrow Marsh Lane* (shown on the Havant Borough Council Aspirational Cycle Map 2036) that was historically the Bedhampton community's only route to the common land of Broadmarsh. The building of H20 will lose this historic route beneath the development.

H20 Road Safety

The proposed development of H20 is unsound because potential increase in traffic generated by H20 will make walking within the Conservation Area hazardous.

The historic nature of the village layout means that paved pedestrian sections are fragmented leaving some areas without pavements, forcing pedestrians to take to the highway. The two blind bends outside *The Elms* are particularly hazardous for visitors who will often view the house from the south side of Lower Road on the approach to Orchard Cottage on the very narrow section of pavement.

The potential additional traffic generated by the development of H20 will increase pedestrian/motor vehicle interaction especially within the bends on the approach to and from the H20 site.

As the best way to view the properties is on foot, most visitors to the Conservation Area viewing and photographing the buildings will be walking in the road. With the potential increase in traffic generated by H20 this can only make this recreational and leisure pursuit hazardous.

H20 will increase traffic flow through the narrow blind bends on Lower Road increasing the risks of road traffic collisions with other vehicles, cycles and pedestrians.

H20 increased traffic will add to the flow of traffic through the narrow Kingscroft Lane as driver behavior will look for alternative routes to avoid queuing at the top of Brookside.

Soundness:

5: Which part of the Local Plan are you commenting on?

Policy number	E13, Historic Environment and Heritage Asset, H20
Paragraph number	5.134, 5.138, 5.140.
Page number	139 - 142
Evidence Base Study	

6: Do you consider the Local Plan is sound in terms of being:

	Yes	No
Justified		X
Effective		X
Positively prepared		X
Consistent with National Policy		X

7: Please give the reason(s) why you do or do not consider the Local Plan document to be sound.

Please be as specific and concise as possible in your response.

There is agreement with paragraphs 5.135 and 5.140 however the last Conservation Area review was in 1994. A further review has been carried out but is still out for public consultation and has yet to have any recommendations being taken back to HBC for adoption. We believe that this review is a key element for informing the Plan, especially H20. The Old Bedhampton Conservation Area is a heritage gem for the amenity of the whole Borough. An Independent Heritage Consultant who carried out the review has recommended consultation to consider an extension to include Lower Road and its verges / hedges, the workers and farm cottages and Old Manor Farm (a positive building of local interest). We would also contend that Narrow Marsh Lane and its railway bridge should also be included for heritage and potential archaeological reasons. However, HBC have ignored this

recommendation in their consultation paper without explanation.

Lower Road is an ancient sunken lane and a continuation of Kings Croft and Bidbury Lanes (1km long passing through the heart of the conservation area). This was part of the turnpike from Havant to Portsmouth and beyond. Old Manor Farm is considered a positive building of local interest and Narrow Marsh Lane is now being considered for assessment of its heritage and archaeological significance with regard to its links to the harbour and onward to Portsmouth and Arundel via the Chichester Canal.

The only access to H20 is via Brookside Road through the Conservation area and past a number of Grade II listed buildings, including The Elms, a grade II* asset. The increased traffic to/from H20 will only detract from the Conservation Area and the Heritage assets with loss of the tranquil ambiance, increased safety concerns and greater conflicts of motorised vehicles with other users.

The proposed development wishes to use a non-native Leylandii type conifer shelter belt which is reaching its end of life, as a screen from the southern and western aspects of the Conservation Area. These trees are undeserving of their TPO status. There are no available records as to why they have a TPO status. Once the belt is lost the Conservation Area setting will be significantly degraded by any development on H20 in the semirural vista.

Likewise H20s northern boundary is Lower Road, a sunken lane and ancient hedge which could be an extension to the conservation area and thus H20 would become part of its setting.

There is a proposal in the Borough Transport Assessment to reconfigure the mini roundabout on the B2177 at the northern end of Brookside Road. This complex junction is deemed to be at near capacity already by HCC Highways and requires traffic light control in order to cope with increased traffic generated by surrounding developments including H20. The reconfiguration will prevent or

make it extremely difficult for traffic exiting Brookside Road to then proceed to Havant. The unintended consequence is likely to drive this traffic through the tranquil heart of the Conservation Area and on into Bidbury and Kings Croft Lanes, a single-track sunken lane with no passing places and a single blind bend. This traffic would then emerge onto the B2177 and attempt to turn right to Havant.

8: Please explain what changes are needed to make the Local Plan sound.

Please suggest revised wording of any policy or text.

Remove H20 from HB Local Plan 2036.

9: If you are seeking a change to the plan, would you like to appear at the examination hearings?

Yes	YES
No	

Please be aware that your comments within this form will carry the same weight as any evidence presented at the examination hearings. It is the inspector's choice as to who is invited to appear at the hearings.

10: If you wish to appear before the inspector at the examination hearings, please explain why this is necessary.

If there is any ambiguity or lack of understanding, I or one of my colleagues representing The Bedhampton Heritage Alliance would be grateful to have the opportunity to clarify.

11: Do you wish to be notified of the following:

- The Local Plan has been submitted for examination
- The appointment of an independent examiner
- The adoption of the Local Plan

Yes	YES
No	

12: Please confirm the date that this form was completed.

Date:	14th March 2019.
--------------	------------------

PART C: SUPPORTING DOCUMENTS

Please list any supporting documents that you are submitting with this form.

None.

Soundness:

5: Which part of the Local Plan are you commenting on?

Policy number	E14, The Local Ecological Network, H20. E15, Protected Species, H20. E16, Solent Special Protection Areas, H20.
Paragraph number	5.166, 5.201.
Page number	143 – 162.
Evidence Base Study	

6: Do you consider the Local Plan is sound in terms of being:

	Yes	No
Justified		X
Effective		X
Positively prepared		X
Consistent with National Policy		X

7: Please give the reason(s) why you do or do not consider the Local Plan document to be sound.

Please be as specific and concise as possible in your response.

The plan states the following: **“Avoiding and mitigating harm”**
5.166 As set out in the NPPF,” if significant harm cannot be avoided (by locating development in a way which does not create the impact), then such harm should be adequately mitigated. Where it cannot be adequately mitigated then such harm must be compensated for. Where it cannot be compensated for, planning permission will be refused. “

There is no data on what percentage of mitigation measures are reviewed, how often they are reviewed and what percentage are deemed successful. Mitigation must not be seen as a tool to merely advance contentious aspects of a plan with little regard to outcomes.

5.201 A protocol for Bechstein's Bats has yet to be published and therefore has not informed H20 which may not destroy roosting sites but will increase local light pollution. The habitat area around H20 has only a tenuous link to the main body of habitat along the A3M corridor northwards. With proposed developments at Campdown, Little Park House and 40 Acres, there must be a real risk of losing the bat population totally from this part of the borough, despite mitigation, as they are crowded out by housing and infrastructure.

E16 and E17 addresses the needs of Brent Geese and wading birds as a consequence of the cumulative impact of developments H20, H14, H40 and C10 which will directly impact on primary and secondary support areas. The plan proposes the establishment of E25, Broadmarsh Coastal Park Refuge. This area is already a very popular destination for walkers (Wayfarers Path), cyclists (national route 22) and visitors in cars from outside the immediate locality. The area is already congested by human activity and is an area far smaller than the cumulative areas it is supposed to mitigate. Any fencing off to protect the bird life will reduce amenity and thus reduce human activity resulting in an adverse effect on Health and Wellbeing.

The NPPF states that the impact of developments should not be assessed on a piecemeal basis but on the cumulative effects of all developments in an area. However, HBC state that the level of mitigation necessary will be determined on a case by case base to be discussed and agreed with Natural England and the Council's ecologist.

Yet another example of The Plan having not been informed by all the necessary evidence.

8: Please explain what changes are needed to make the Local Plan sound.

Please suggest revised wording of any policy or text.

Remove H20 from HB Local Plan 2036.

9: If you are seeking a change to the plan, would you like to appear at the examination hearings?

Yes	YES
No	

Please be aware that your comments within this form will carry the same weight as any evidence presented at the examination hearings. It is the inspector's choice as to who is invited to appear at the hearings.

10: If you wish to appear before the inspector at the examination hearings, please explain why this is necessary.

If there is any ambiguity or lack of understanding, I or one of my colleagues representing The Bedhampton Heritage Alliance would be grateful to have the opportunity to clarify.

11: Do you wish to be notified of the following:

- The Local Plan has been submitted for examination
- The appointment of an independent examiner
- The adoption of the Local Plan

Yes	YES
No	

12: Please confirm the date that this form was completed.

Date:	14th March 2019.
--------------	------------------

PART C: SUPPORTING DOCUMENTS

Please list any supporting documents that you are submitting with this form.

None.

Soundness:

5: Which part of the Local Plan are you commenting on?

Policy number	E1, High Quality Design with reference to H20.
Paragraph number	5.3 and Ciii.
Page number	107
Evidence Base Study	NPPF

6: Do you consider the Local Plan is sound in terms of being:

	Yes	No
Justified		X
Effective		X
Positively prepared		X
Consistent with National Policy		X

7: Please give the reason(s) why you do or do not consider the Local Plan document to be sound.

Please be as specific and concise as possible in your response.

H20 is unsound as any development will increase vehicular traffic significantly which will in turn impact adversely on the current use of Brookside and Lower Roads as tranquil and safe areas for walkers and cyclists. The roads are in part narrow (less than 5 metres), pass through a Conservation Area, in large parts without pavements, with 3 blind bends in quick succession and drainage problems which can narrow the carriage way by up to 50% after rainfall. A development of 50 dwellings causing increased traffic (possibly as much as doubling movements) will subdue current levels of walking and cycling on the shared space with a negative impact on Health and Wellbeing of current inhabitants from within and without the area, contrary to this policy (E1), E2 and NPPF para 8b & c, para 91a, b & c, para 102c, 104d.

Para 5.3 C iii states *“any development identifies and positively responds to existing natural and built features including listed buildings, conservation areas and other heritage assets within or close to the development.”* H20 is currently screened to the east by non-native 40 feet high Leylandii type conifers coming to end of life (circa 40yrs). They have not been an agricultural requirement for at least 20 years and are not planted on any historical alignment. Once removed the development will be visible from the western and southern aspects of the Conservation Area almost certainly detracting from its setting.

The proposed development H20 will be bordered to the north by an ancient hedge on the southern boundary of the sunken lane called Lower Road. This used to be the main thoroughfare (Turnpike) from Havant to Portsmouth and beyond. A substantial part of the historic hedge will be lost to provide access to the site. The sunken lane (Lower Road) along with some positive buildings (farm buildings of local interest and cottages) are part of a proposal for inclusion in an extension to the current Conservation Area. A review is currently out for consultation but has yet to inform The Plan.

Narrow Marsh Lane is an ancient road (more than 200 years old) that runs through the site. It has been bisected by the A27 bypass and land reclamation to the south but its northern and southern sections are still clearly visible with a railway bridge (circa 1844) at its midpoint and a “Landing Place” within Langstone Harbour (map evidence since at least 1859). It is clearly an important heritage asset worthy of potential designation.

Residents used to make active use of the lane for informal recreation but no formal closure documentation can be traced at this time. It is widely believed that access should be re-instated with a connection being made to The Wayfarers Path on Mill Lane.

If this is not possible, it would not justify removing from or even relocating this historical evidence within the development site.

8: Please explain what changes are needed to make the Local Plan sound.

Please suggest revised wording of any policy or text.

Remove H20 from the HB Local Plan 2036.

9: If you are seeking a change to the plan, would you like to appear at the examination hearings?

Yes	YES
No	

Please be aware that your comments within this form will carry the same weight as any evidence presented at the examination hearings. It is the inspector's choice as to who is invited to appear at the hearings.

10: If you wish to appear before the inspector at the examination hearings, please explain why this is necessary.

If there is any ambiguity or lack of understanding, I or one of my colleagues representing The Bedhampton Heritage Alliance would be grateful to have the opportunity to clarify.

11: Do you wish to be notified of the following:

- The Local Plan has been submitted for examination
- The appointment of an independent examiner
- The adoption of the Local Plan

Yes	YES
No	

12: Please confirm the date that this form was completed.

Date:	14 th March 2019.
--------------	-------------------

PART C: SUPPORTING DOCUMENTS

Please list any supporting documents that you are submitting with this form.

https://maps.nls.uk/view/102343152. Narrow Marsh Lane, Landing Place.

Soundness:

5: Which part of the Local Plan are you commenting on?

Policy number	E2, Health and Wellbeing, H20
Paragraph number	5.12, 5.15, 5.20, 5.23, 5.24.
Page number	110 - 112
Evidence Base Study	NPPF.

6: Do you consider the Local Plan is sound in terms of being:

	Yes	No
Justified		X
Effective		X
Positively prepared		X
Consistent with National Policy		X

7: Please give the reason(s) why you do or do not consider the Local Plan document to be sound.

Please be as specific and concise as possible in your response.

H20 is unsound as any development will increase vehicular traffic significantly which will in turn impact adversely on the current use of Brookside and Lower Roads as tranquil and safe areas for walkers and cyclists. The roads are in part narrow (less than 5 metres), pass through a Conservation Area, in large parts without pavements, with 3 blind bends in quick succession and drainage problems which can narrow the carriage way by up to 50% after rainfall. A development of 50 dwellings causing increased traffic (possibly as much as doubling movements) will subdue current levels of walking and cycling on the shared space with a negative impact on safety, Health and Wellbeing of current inhabitants from within and without the area, contrary to this policy (E1), E2 and NPPF para 8b & c, para 91a, b & c, para 102c, 104d.

Para 5.15 talks of walkable neighbourhoods to encourage people to walk and cycle more and drive less. This site is 600 metres to the nearest bus stop, 700m to nearest newsagent, 900m to the nearest food shop, 1200m to the nearest junior school, 1.2km to Bedhampton Station (where only a minority of trains stop) and 2.3km to Havant Station where all trains stop. Whilst some of these distances are walkable and cyclable, not all are in the same direction. As explained above with increased vehicular traffic, the local roads and those in Old Bedhampton will be considered less safe for pedestrians and cyclists resulting in diminished use and resulting in more motorized movements. A viscous cycle. Families in affordable homes will tend to be younger and with these distances more likely to resort to motorized transport.

8: Please explain what changes are needed to make the Local Plan sound.

Please suggest revised wording of any policy or text.

Remove H20 from HB Local Plan 2036.

9: If you are seeking a change to the plan, would you like to appear at the examination hearings?

Yes	YES
No	

Please be aware that your comments within this form will carry the same weight as any evidence presented at the examination hearings. It is the inspector's choice as to who is invited to appear at the hearings.

10: If you wish to appear before the inspector at the examination hearings, please explain why this is necessary.

If there is any ambiguity or lack of understanding, I or one of my colleagues representing The Bedhampton Heritage Alliance would be grateful to have the opportunity to clarify.

11: Do you wish to be notified of the following:

- The Local Plan has been submitted for examination
- The appointment of an independent examiner
- The adoption of the Local Plan

Yes	YES
No	

12: Please confirm the date that this form was completed.

Date:	14 th March 2019.
--------------	-------------------

PART C: SUPPORTING DOCUMENTS

Please list any supporting documents that you are submitting with this form.

None.

PART A: CONTACT DETAILS

Please provide your contact details and those of your agent (if appointed).

[illegible]

PART B: YOUR REPRESENTATION

Legal Compliance:

1: Which part of the Local Plan are you commenting on?

Policy number	
Paragraph number	
Page number	
Evidence Base Study	

2: Do you consider the Local Plan has been prepared in line with legal and procedural requirements?

Please see guidance notes.

Yes	YES
No	

3: Please give the reason(s) why you do or do not consider the Local Plan document to have been prepared in line with legal and procedural requirements?

Please be as specific and concise as possible in your response.

None.

4: Please explain what changes or actions are needed to make the Local Plan legally compliant.

Please suggest revised wording of any policy or text.

None.

Soundness:

5: Which part of the Local Plan are you commenting on?

Policy number	E3, Landscape and Settlement Boundaries, H20
Paragraph number	5.29e, 5.38
Page number	113 -115.
Evidence Base Study	

6: Do you consider the Local Plan is sound in terms of being:

	Yes	No
Justified		X
Effective		X
Positively prepared		X
Consistent with National Policy		X

7: Please give the reason(s) why you do or do not consider the Local Plan document to be sound.

The site H20 will not integrate with the local landscape surrounding the proposed development. It is currently screened to the east by non-native 40 foot high Leylandii type conifers coming to end of life (circa 40yrs). They have not been an agricultural requirement for at least 20 years and are not planted on any historical alignment. Once removed the development will be visible from the western and southern aspects of the Conservation Area almost certainly detracting from its setting.

The proposed development H20 will be bordered to the north by an ancient hedge on the southern boundary of the sunken lane called Lower Road. This used to be the main thoroughfare (Turnpike) from Havant to Portsmouth and beyond. A substantial part of the historic hedge will be lost to provide access to the site. The sunken lane (Lower Road) along with some positive buildings

(farm buildings of local interest and cottages) are part of a proposal for inclusion in an extension to the current Conservation Area. A review is currently out for consultation but has yet to inform The Plan.

Narrow Marsh Lane is an ancient road (more than 200 years old) that runs through the site. It has been bisected by the A27 bypass and reclamation to the south but its northern and southern sections are still clearly visible with a railway bridge (circa 1844) at its midpoint and a “Landing Place” within Langstone Harbour (On maps since at least 1859). It is clearly an important heritage asset worthy of potential designation.

Residents used to make active use of the lane for informal recreation but no formal closure documentation can be traced at this time. It is widely believed that access should be re-instated with a connection being made to The Wayfarers Path on Mill Lane. If this is not possible, it would not justify removing from or even relocating this historical evidence within the development site.

8: Please explain what changes are needed to make the Local Plan sound.

Please suggest revised wording of any policy or text.

Remove H20 from HB Local Plan 2036.

9: If you are seeking a change to the plan, would you like to appear at the examination hearings?

Yes	YES
No	

Please be aware that your comments within this form will carry the same weight as any evidence presented at the examination hearings. It is the inspector's choice as to who is invited to appear at the hearings.

10: If you wish to appear before the inspector at the examination hearings, please explain why this is necessary.

If there is any ambiguity or lack of understanding, I or one of my colleagues representing The Bedhampton Heritage Alliance would be grateful to have the opportunity to clarify.

11: Do you wish to be notified of the following:

- The Local Plan has been submitted for examination
- The appointment of an independent examiner
- The adoption of the Local Plan

Yes	YES
No	

12: Please confirm the date that this form was completed.

Date:	14 th March 2019.
--------------	-------------------

PART C: SUPPORTING DOCUMENTS

Please list any supporting documents that you are submitting with this form.

<https://maps.nls.uk/view/102343152>. Narrow Marsh Lane, Landing Place.

PART B: YOUR REPRESENTATION

Legal Compliance:

1: Which part of the Local Plan are you commenting on?

Policy number	
Paragraph number	
Page number	
Evidence Base Study	

2: Do you consider the Local Plan has been prepared in line with legal and procedural requirements?

Please see guidance notes.

Yes	YES
No	

3: Please give the reason(s) why you do or do not consider the Local Plan document to have been prepared in line with legal and procedural requirements?

Please be as specific and concise as possible in your response.

None.

4: Please explain what changes or actions are needed to make the Local Plan legally compliant.

Please suggest revised wording of any policy or text.

None.

Soundness:

5: Which part of the Local Plan are you commenting on?

Policy number	E6, Best and Most Versatile Agricultural Land, H20.
Paragraph number	5.65, 5.67, 5.68.
Page number	124
Evidence Base Study	

6: Do you consider the Local Plan is sound in terms of being:

	Yes	No
Justified		X
Effective		X
Positively prepared		X
Consistent with National Policy		X

7: Please give the reason(s) why you do or do not consider the Local Plan document to be sound.

Please be as specific and concise as possible in your response.

Land south of Lower Road is Grade 1 or 2 and is therefore best and most versatile (BMV) agricultural land as defined by NPPF. The H20 site is 3.8 hectares of land in the centre of approximately 15 hectares of land. If developed it will leave similar sized plots to its east, to its west and to the south across the railway. These residual plots will become more difficult to access with farm machinery along local roads (B2177) as well as Brookside and Lower Roads, possibly making the residual plots commercially uneconomical and difficult to farm. This risks the residual plots becoming less attractive and viable to farm and potentially abandoned thus detracting from the semirural landscape and negatively impacting on the Conservation Area setting but more importantly another 12 hectares of BMV agricultural land could be lost as a consequence of H20 being developed.

HBC state that this land has to be developed to meet its OAN for housing which cannot be met on brownfield or poor quality greenfield sites alone. Developing H20 will deliver 50 dwellings of which 30% are likely to be “affordable” homes.

The merit of the development of H20 does not significantly outweigh the negative impact of the loss of 15 hectares of BMV agricultural land will result in a significant reduction of the semirural landscape and impact negatively on the Conservation area setting. If there are no other sites within Havant Borough to meet the housing need, surely it would be best practice for HBC to meet its duty to co-operate with adjacent authorities rather than use BMV land from within its own boundary, an increasingly rare commodity.

8: Please explain what changes are needed to make the Local Plan sound.

Please suggest revised wording of any policy or text.

Remove H20 from HB Local Plan 2036.

9: If you are seeking a change to the plan, would you like to appear at the examination hearings?

Yes	YES
No	

Please be aware that your comments within this form will carry the same weight as any evidence presented at the examination hearings. It is the inspector’s choice as to who is invited to appear at the hearings.

10: If you wish to appear before the inspector at the examination hearings, please explain why this is necessary.

If there is any ambiguity or lack of understanding, I or one of my colleagues representing The Bedhampton Heritage Alliance would be grateful to have the opportunity to clarify.

11: Do you wish to be notified of the following:

- The Local Plan has been submitted for examination
- The appointment of an independent examiner
- The adoption of the Local Plan

Yes	YES
No	

12: Please confirm the date that this form was completed.

Date:	14th March 2019.
--------------	------------------

PART C: SUPPORTING DOCUMENTS

Please list any supporting documents that you are submitting with this form.

None.

Soundness:

5: Which part of the Local Plan are you commenting on?

Policy number	H20, Land South of Lower Road, Sustainability.
Paragraph number	8.31, 8.32
Page number	258 - 260
Evidence Base Study	The Sustainability Appraisal Objective for H20, HB Draft Local Plan 2036.

6: Do you consider the Local Plan is sound in terms of being:

	Yes	No
Justified		X
Effective		X
Positively prepared		X
Consistent with National Policy		X

7: Please give the reason(s) why you do or do not consider the Local Plan document to be sound.

Please be as specific and concise as possible in your response.

The Sustainability Appraisal Objective for H20, HB Draft Local Plan 2036 does not stand up to scrutiny.

OBJECTIVES:

1. Develop a dynamic, diverse and knowledge-based economy that excels in innovation with higher value, lower impact activities.

Havant Borough Council (HBC) scored Positive effect (no explanation why), **1 point**.

Bedhampton Heritage Alliance (BHA) considers H20, only 50 dwellings to have a neutral or no significant effect, **0 points**.

2. Provide affordable, environmentally sound and good quality housing for all.

HBC considers this to have a strong positive effect, **2 points**.

BHA considers this to have only a positive effect, **1 point**.

3. Safeguard and improve community health, safety and wellbeing.

HBC considers this to have an uncertain effect, **0 points**.

BHA considers this to have a negative effect with increased traffic volumes and E25 impeding walking, cycling and safety, **minus 1 point**.

4. Promote and support climate change mitigation through reducing Havant's (the borough) greenhouse gas emissions from all sources and plan for anticipated levels of climate change.

HBC consider this will be a positive effect, **1 point**.

BHA considers the increased use of vehicles to have an uncertain effect, **0 points**

5. Reduce the risk of flooding from all sources and the resulting detriment to public wellbeing, the economy and environment. Take a sequential approach to development and avoid putting more people and property at risk of being affected by flooding where possible. Manage flood risk where necessary.

HBC have scored this as a positive effect, **1 point**.

BHA considers this as neutral or no effect, **0 points**.

6. Protect, enhance and manage sites, features, areas and landscapes of archaeological, historical and cultural heritage

importance and their setting.

HBC considers this as a negative effect, **minus 1 point**.

BHA considers the impact to be greater and more significant, a strong negative effect, as discussed in other submissions, **minus 2 points**.

7. Protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening local distinctiveness and sense of place.

HBC considers only negative effect, **minus 1 point**.

BHA considers this will have a strong negative effect, as discussed in other more detailed submissions, **minus 2 points**.

8. Protect, enhance and manage biodiversity and geodiversity, supporting the enhancement and connectivity of ecological green networks.

HBC Uncertain effects, **0 points**.

BHA. Negative effects, as discussed in associated submissions, **minus 1 point**.

9. Protect and conserve natural resources.

HBC Negative effect, **minus 1 point**.

BHA Negative effect with loss of BMV land, **minus 1 point**.

10. Reduce waste generation and disposal, and promote the waste hierarchy of reduce, reuse, recycle/compost, energy, recovery and disposal.

HBC Neutral / no effect, 0 points.

BHA Neutral / no effect, 0 points.

11. Improve the efficiency of transport networks by increasing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel and provide the opportunities for walking and cycling.

HBC Uncertain effects, 0 points.

BHA Negative effect, as discussed in other submitted submissions, minus 1 point.

12. Improve air, water and soil qualities through reducing pollution both diffuse and point source.

HBC Uncertain effects, 0 points.

BHA Neutral or no effect, 0 points.

13. Reduce poverty and social exclusion and close the gap between the most deprived areas in the Borough and the rest of the Borough.

HBC Strong positive effect (no evidence given), 2points.

BHA Neutral or no effect, H2O so small unlikely to impact, 0 points.

14. Ensure easy and equitable access to services, facilities and opportunities.

HBC Positive effect, **1 point**.

BHA Neutral or no effect, H2O unlikely to contribute, **0 points**.

Scoring:

Strong positive effect 2points.

Positive effect 1point.

Neutral or no effect 0 points.

Uncertain effects 0 points.

Negative effect minus 1 point.

Strong negative effect minus 2 points.

Total scores

HBC assessment = **plus 5 points**.

BHA assessment = **minus 7 points**.

Summary.

The relatively small number of dwellings proposed is the only minor positive effect whilst H2O does:

- A) not protect or enhance landscapes of archaeological, historical and cultural heritage importance and their settings.
- B) not enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening local distinctiveness and sense of place.

C) not protect against the use of grade 1 / 2 agricultural land and thus does not protect natural resources.

D) not protect, enhance and manage biodiversity and geodiversity, supporting the enhancement and connectivity of ecological green networks.

E) not protect against increased use of vehicular transport, itself a negative impact (pollution and congestion), but as a consequence will also adversely affect the current high levels of walking and cycling in a currently tranquil and safe shared space environment, which will thus negatively impact on the health and wellbeing of those living and visiting the area.

F) HBC council have underestimated the detrimental effects of H20 when promoting it as a site for early release in order to meet the 5-year housing supply. There are now 5 reports (Conservation Area Review 2019, HB Traffic Assessment 2019, Lizard Landscape Review 2018, Bechstein bat Protocol, SWBG Plan, all with evidence yet to inform Pre-submission Plan. However, an updated Sustainability Appraisal Objective for H20 using some emerging evidence paints a more negative impact of H20 and Old Bedhampton.

G) Council Officers and Members (from other Wards), Town Planners, Consultants and Developers, all have a great knowledge of legislation and guidance that in the main is subjective when they apply it to development sites. Only those that reside within a locality acquire a more objective level of knowledge that comes from the intimacy of living within an area. This probably accounts for the gulf between the scores reached HBC and BHA from The Sustainability Appraisal Objective for H20.

8: Please explain what changes are needed to make the Local Plan sound.

Please suggest revised wording of any policy or text.

Remove H20 from HB Local Plan 2036.

9: If you are seeking a change to the plan, would you like to appear at the examination hearings?

Yes	YES
No	

Please be aware that your comments within this form will carry the same weight as any evidence presented at the examination hearings. It is the inspector's choice as to who is invited to appear at the hearings.

10: If you wish to appear before the inspector at the examination hearings, please explain why this is necessary.

If there is any ambiguity or lack of understanding, I or one of my colleagues representing The Bedhampton Heritage Alliance would be grateful to have the opportunity to clarify.

11: Do you wish to be notified of the following:

- The Local Plan has been submitted for examination
- The appointment of an independent examiner
- The adoption of the Local Plan

Yes	YES
No	

12: Please confirm the date that this form was completed.

Date:	14th March 2019.
--------------	------------------

PART C: SUPPORTING DOCUMENTS

Please list any supporting documents that you are submitting with this form.

None.

Soundness:

5: Which part of the Local Plan are you commenting on?

Policy number	H20, Land south of Lower Road.
Paragraph number	8.32
Page number	258 -260
Evidence Base Study	

6: Do you consider the Local Plan is sound in terms of being:

	Yes	No
Justified		X
Effective		X
Positively prepared		X
Consistent with National Policy		X

7: Please give the reason(s) why you do or do not consider the Local Plan document to be sound.

Please be as specific and concise as possible in your response.

There are 4 major critical reports / reviews that have not been consulted on or reported at the time of this representation. These are paramount when informing the Local Plan 2036 which is thus not 100% evidence based, especially in respect of H20.

The Old Bedhampton Conservation Review 2019 is now only just going out for consultation having last been reviewed in 1994. The HBC consultation document makes some recommendations but has some significant omissions as compared to the Independent Heritage Consultant's final submitted version. This has been no explanation for this omission. There are contentious issues that could have a very large impact on informing the Local Plan, specifically H20. The positioning of the boundaries of the adopted extensions to the Conservation Area will have a large effect on views and settings and consequently on any proposed

development. Potential Heritage sites such as Narrow Marsh Lane could be lost within the development site. The shelter belt of non-native conifers is no longer an agricultural necessity and is reaching its end of life (circa 40 years). Removal should be considered despite its unjustified TPO in order to open up the views and setting of the Conservation Area to the East and North.

The HCC Highways 2018 assessment for the complex junction ID10 B2177 (page 71) proposes conversion of the mini roundabout to a traffic light scheme with a radical change to the layout of the junction. Plans show a significantly shortened slip road for traffic turning right into Brookside Road, risking queued traffic blocking other traffic heading eastbound and crossing the junction to use other exits. Traffic exiting Brookside Road intending to head for Havant will have to consider alternatives such as turning Bidbury Lane and Kings Croft Lanes into a rat run which will negatively impact on the tranquillity of the heart of the Conservation Area.

Mitigation has to be considered for Bechstein's Bats but the forthcoming Bechstein's Bat Planning Protocol which will set out clear guidance regarding appropriate surveying techniques, as well as potential avoidance, mitigation and enhancement opportunities has yet to be published.

Likewise, there is no evidence as yet to support the mitigation plans (E25) for solent wader and Brent goose strategy to compensate for the cumulative loss of primary and secondary support areas with the development of H40, H14, H20 and C10. Using E25 will have an impact on the Health and Wellbeing of folk using this very popular area for walking and relaxing in an area of beauty and tranquillity on the shores of north Langstone Harbour.

These are all critical infrastructure changes that should be decided, financed and in place before sites such as H20 are considered for development.

8: Please explain what changes are needed to make the Local Plan sound.

Please suggest revised wording of any policy or text.

Remove H20 from HB Local Plan 2036.

9: If you are seeking a change to the plan, would you like to appear at the examination hearings?

Yes	YES
No	

Please be aware that your comments within this form will carry the same weight as any evidence presented at the examination hearings. It is the inspector's choice as to who is invited to appear at the hearings.

10: If you wish to appear before the inspector at the examination hearings, please explain why this is necessary.

If there is any ambiguity or lack of understanding, I or one of my colleagues representing The Bedhampton Heritage Alliance would be grateful to have the opportunity to clarify.

11: Do you wish to be notified of the following:

- The Local Plan has been submitted for examination
- The appointment of an independent examiner
- The adoption of the Local Plan

Yes	YES
No	

12: Please confirm the date that this form was completed.

Date:	14th March 2019.
--------------	------------------

PART C: SUPPORTING DOCUMENTS

Please list any supporting documents that you are submitting with this form.

Local Plan Transport Assessment (Mainland) December 2018.
