

I have had a look at the material posted on the 30th Aug and the Policy update posted in May and here are some further representations on behalf of the Bedhampton Heritage Alliance (BHA).

There are some key recognitions within the Policy Team update:

- * There should be 'no automatic permission'.
- * Given the adjacent Conservation Area, the application should have been a detailed application. I can find no statement as to why an outline application was accepted. **This provides one single overriding reason for refusal.**
- * As submitted, the layout can only be for illustration. Any decision will consequently be based upon **guesswork! Another reason for refusal.**
- * The illustrative layout has not changed. It still indicates that the principal access route leads to a road with no footpaths flanked by a continuous succession of forecourt parking bays. This does not enhance the setting of the Conservation Area. "Proposals would be expected to address nearby heritage assets and their setting, and how they conserve and enhance them". They do **not** do this. They obscure it. In order to gain access they directly encroach on the 'buffer zone' (see below). **Another reason for refusal.**
- * There are **no** exceptional circumstances (as referred to in the adopted local plan) here which would apply to housing. **A fourth policy reason for refusal.**

Turning to the other material.

iTransport have written in response to a HCC holding **objection** but the Highway response is not yet known. The access is through the current development site where the point of access now has more hard landscape with more footpaths and a swale not yet fully designed. The 'green buffer' to the CA is reduced to narrow verges. No justification has been provided on why this point of access has been selected. **A further reason for refusal (5).**

At the Appeal Inquiry, the inclusion/provision of the green buffer was accepted by the Inspector to be a mitigating factor for the harm to the setting of the Conservation Area. It follows from this that the proposal will do **unmitigated harm** to the setting of the Conservation Area. **A further reason for refusal(6).**

We have yet to see **any** acknowledgement by iTransport that their risk assessment is deeply flawed and consequently misleading (dangers on the shared bends {opposing vehicles meeting at the same time and place as non vehicle users} will arise every two days not once in a lifetime). Nor have we seen any challenge to this by HCC as Highway Authority. Statistics related to probability **cannot** be the product of multiplication of three or more variables. This is a very basic statistical fact that should be known by the people dealing with this. It requires extensive computer modelling. The Committee needs advice that is correct. This is contained in the submission by BHA.

Unfortunately safety concerns were not included in the reasons for refusal pulled together at the Development Management Committee to overturn the officer recommendation: **an oversight**. The Appeal Inspector acknowledged the safety concerns of the Rule 6 parties but determined that he was prevented from its inclusion in the 'planning balance'. Nothing will prevent the Committee from including it in their judgement of harm versus benefit.

Clearly, additional development on the site and the added increased pedestrian and non motorized vehicular, cycles and scooters, usage of Lower Road by residents at 40 Acres will inevitably increase the probability of conflicts. This is likely to result in a higher volume of am peak hour when human nature is likely to lead to regular 'bunching' of groups with the same destinations, schools and public transport; making such groups even more vulnerable. The committee needs to know when the

potential extra volume results in too much? Access to the computer analysis has been offered without any take up. **Absence of this is another reason for refusal(7).**

Drainage: This is a major obstacle to any support from LLFA. It is not clear yet if the LLFA agree to the present proposals, which do not contain any storage area unlike the present development. It seems that the applicants are relying upon the formation of a Management Company to maintain the SUD arrangements but what if they don't work? A detailed application would address this. **The absence of a clearly demonstrable workable solution now is another reason for refusal (8).**

Habitats: It is noted that comprehensive surveys/research have led to a reduction in the protected status of the land. The site formed part of the case for mitigation on the previous proposal. The proposal will significantly reduce the area. Accessible Green Spaces are now recognised as having multiple benefits. The site marks the edge of the urban fringe and acts as a buffer to the A27/A3M and railway line. More than just retaining the setting of the Conservation Area, it has a number of potential long term uses that could serve the local area and outweigh any benefits from housing. These should be explored through the new Local Plan. It should be **refused as being premature (9).**

All the above reasons for refusal contribute to the prevention of cumulative harm. They result in the 'planning balance' being **against** the proposals.

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