

Your Ref: APP/19/00427



7 June 2019

Planning Services
Havant Borough Council
Public Service Plaza Civic Centre Road
Havant
PO9 2AX

Dear Sir,

Objection to planning application No APP/19/00427

I am writing to raise my concerns and objections to this application by Bargate Homes (BH) to build 50 dwellings off Lower Road, Bedhampton which should be refused planning permission.

1. Firstly, it is inappropriate for any permission to be granted at the present time when the Local Plan 2036 has not been agreed yet and there is a review ongoing for the Old Bedhampton Conservation Area. It should therefore be refused and Bargate Homes can apply again after the Local Plan and Conservation Area review have been agreed which are due to set out the guidelines for development in this area. BH are trying to jump the gun and obtain permission before it potentially gets more difficult for them to do so. The result of the application will profoundly affect decisions for the area H20.
2. At present this is a greenfield site with agricultural land of grades 1 and 2. It is not necessary to use this greenfield site rather than other brownfield sites to build 50 dwellings which will hardly make any difference to the supply needed for Havant as it is such a small number. It will degrade the ecology of the area.
3. If planning permission is given this will set a precedent. There is little doubt the landowner will try again in a few years' time to obtain permission to build on the remaining two fields, one either side of this development. He would no doubt use the argument that as they are now fragmented and less viable for agriculture they are not sustainable on their own and cut off from any other agricultural land. So if this development is allowed to go ahead it makes further development in this area much more likely at the expense of the nature and character of the Conservation area. The whole site should be preserved as agricultural land as it gives a green setting to the historic Conservation Area.

Part of the appeal and attractiveness of the Conservation Area is that it has a rural setting. If these three fields are developed there will be no rural setting to enhance the heritage assets. One of the important constraints set out in the Pre-Submission Local Plan for H20 is the impact and setting of the nearby heritage assets and their setting. Reference is made in particular to "the access through the Conservation Area and the need to retain the "village" feel" and the design code should respond "to the semi-urban/rural setting of the adjacent

Old Bedhampton Conservation Area....., surrounding fields and access restrictions via Brookside Road and Lower Road”.

4. The Development Consultation Forum stated that “The impact of nearby heritage assets and their setting must be addressed”. The Bedhampton Conservation Area is adjacent and includes several Grade II listed buildings and others of historic interest.

The Heritage Statement produced by Terence O’Rourke Ltd sets out the National Planning Practice Guidance on conserving and enhancing the historic environment and says “heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance”. Local authorities are required to give “great weight” to the objective of conserving designated heritage assets. All harm to them requires “clear and convincing justification”.

This application does not deal with the effects of this development on the heritage assets in the Conservation area and the quiet rural nature of the roads through the Conservation area beyond setting out whether the new development is visible from the Conservation Area or changes views from various viewpoints.

Public benefits from a development must outweigh any harm caused. This has manifestly not been shown. To build 50 dwellings here is a minute proportion of the Borough’s needs for new housing but at the cost of degrading the heritage assets and their setting. There is no “clear and convincing justification” for the development.

The tranquil village of Old Bedhampton with its rural nature and historic buildings will be ruined if permission is granted.

5. No proper consideration has been given to the effect of the development, particularly the increase in traffic (vehicular, cyclist and pedestrian) on the Conservation area and on the residents of Brookside Road and Bidbury Lane. Much of these roads are also shared surface streets which are already unsafe at present before any increase in traffic. The only consideration has been of the impact on Lower Road itself. All the roads in Old Bedhampton are rural in character.
6. The traffic considerations are not “joined up” thinking. The Pre-Submission Local Plan Final Transport Assessment gives a scenario of a fully signalised junction with traffic lights to replace the Belmont roundabout but this has not figured in the consideration of the additional traffic and delays incurred for this proposed development. If such traffic lights were put in there will be additional delays to getting out of Brookside Road anyway before the additional cars generated by the added 50 dwellings of this development.

The plan for the proposed signalised junction shows a shortening of the waiting lane to turn right down into Brookside Road from Bedhampton Road too, meaning cars will queue back onto the junction itself. In calculating the additional delay when coming from Portsdown Hill Road, i-Transport in their statement have taken no account is taken of the fact that there will be added traffic caused at this junction because traffic coming out of Brookside Road wishing to drive towards Havant will have to go east first down to the Rusty Cutter

roundabout and back up to the signalised Belmont junction again to travel west towards Havant.

7. No consideration has been given to the fact that the additional traffic would no doubt try and avoid the Belmont junction altogether particularly if it is bound for Havant by going along Bidbury Lane (the narrow sunken lane which is single lane with very few passing places and a blind corner) instead. Even if the traffic signals are not put in there will be a tendency for traffic from the proposed development to cut out the junction by using Bidbury Lane as a "rat run" at peak times.
8. The Transport Statement prepared by i-Transport for BH says in para 4.3.3 that a new footpath is proposed and states :

"The stretch of Lower Road near the site currently without a footway will therefore cease to exist with development in place."

But the new footpath does not extend along the whole of Lower Road – only along a short part of the road and does nothing to help the narrow section without a footpath between the two blind bends. Furthermore it is diverted away from the roadside behind the hedging. I doubt most people walking from the Rusty Cutter roundabout and along Lower Road will be bothered to take a longer route behind the hedging and most will simply continue to walk on the road rather than take a longer diversion.

9. The traffic estimations in the model used do not stand up to scrutiny. They do not allow for future increases in traffic. The number of additional cars estimated at peak times are unbelievable.

We are talking about 50 dwellings which are going to have in total 136 car parking spaces. Even taking off the 9 spaces allocated for visitor parking, this is 127 car parking spaces for residents. As all of the dwellings are going to be 2, 3 or 4 bedroom dwellings rather than for single occupancy it is reasonable to assume they will be mainly accommodation for families with two adults and most likely two cars. Some may have more than two cars if there are adult children living at home. To say these are likely to add only an extra 26 additional vehicle movements at peak times seems disingenuous. If there are two adults working in full time work in, say, two thirds of the dwellings commuting at peak times this would add an extra 33 vehicular movements. I suggest that is a very conservative figure and that in fact the number of additional vehicular movements is likely to be significantly higher than 33.

I do not believe the additional vehicular traffic will enable the road to "continue to be a quiet and safe environment when the development is complete with the development having no noticeable impact on the safety or operation of Lower Road" as is claimed in para 6.9.5 of the Transport Statement by i-Transport. It will make the road dangerous.

10. The traffic data collected was incomplete and drew inferences for which there was insufficient data to substantiate. In reply to a question at the Development Consultation Forum on 23rd May 2018 we were told that the traffic data was collected on 19th to 22nd April, 4th to 10th May and on 17th May and that none was collected during winter months or during adverse weather conditions. There is no full 7 day collection period here and no account taken of additional journeys undertaken by car instead of walking/cycling in bad winter weather.

11. The information given about accidents and likelihood of pedestrians meeting cars on the triple bend section of Lower Road is unreliable and misleading. I have lived in Brookside Road for nearly 30 years. In that time there have been three accidents where cars have attempted to take the first bend when coming down Brookside Road from the main road too fast and I have heard from inside my house the crash as they have hit (and knocked down on two occasions) part of the boundary wall of Manor Cottage. I am sure there must have been a lot of near misses too.
12. The information given about the typical speed of vehicles is also misleading. Traffic can go significantly faster down the initial straighter part of Brookside Road than the speeds quoted for Lower Road. Much of Brookside Road is also a shared surface street and is included in the Conservation Area. With the added pedestrian and vehicular traffic it will not be safe to use as a shared surface street.
13. The pedestrians in Brookside Road (especially at weekends) frequently take up a lot of space on the shared surface roadway. It is common to see parents with a pushchair, another small child held by the hand on one side and a dog on a lead walking out to the other side. These can take up half the available roadway between them. Added to which there are frequently a lot of cars parked along Brookside Road anyway at most times of day. (I believe some or all of these belong to carers visiting various houses.) So much of Brookside Road is often only passable as a single lane.
14. The i-Transport Statement details an alternative pedestrian route from the development to the main road up Lodge Road and along Footpath 107. Most pedestrians will be wanting to go to the shops, services and facilities in Bedhampton and these are all to the north east (with the exception of the Rusty Cutter restaurant) so will naturally tend to walk the more direct route along Bidbury Lane and across the recreation ground rather than up Footpath 107. Footpath 107 is extremely narrow. If weeds are not kept under control (and dog poo not picked up) it can become even narrower too and for i-Transport to suggest that it can be navigated by pushchairs and wheelchairs because at certain points it widens to 1.4 or 1.6m is disingenuous. What if you meet another pedestrian at the narrow part?
15. Some bungalows are included in the plans. The Development Consultation Forum stated that "the inclusion of a number of bungalows is supported as they may suit those with mobility issues of which there is a shortage."

It is likely therefore that some residents will have mobility issues and/or be wheelchair users who would find the narrow footpath and shared surface streets difficult to use. There is already a nursing home based on the part of Lower Road between the two blind bends which may have residents in wheelchairs/mobility scooters from time to time who would like to be pushed outside for some air if it was safer for them to use the road.

16. If the roadway round the bends in Lower Road is ample enough in width as claimed for large vehicles why is it in the last year or so when a house was being rebuilt from scratch at 11 Lower Road that many of the construction vehicles had to mount the grass verge between The Elms and 20 Brookside Road in order to pass each other? The verge was so destroyed in the process that it turned to mud and the grass had to be re-sewn and the verge reinstated. How much more damage would construction traffic for 50 dwellings do in the Conservation area right in front of the Grade 11 listed The Elms? Is it because large lorries cannot negotiate the sharp bends on this part of the road without going outside of their lane? I suggest it is.

17. The overall impact the additional housing in the proposed development will have on the area will be highly detrimental to the area's use for recreation and enjoyment as a green space.

Yours faithfully

A large black rectangular redaction box covering the signature and name of the sender.