

## **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.**

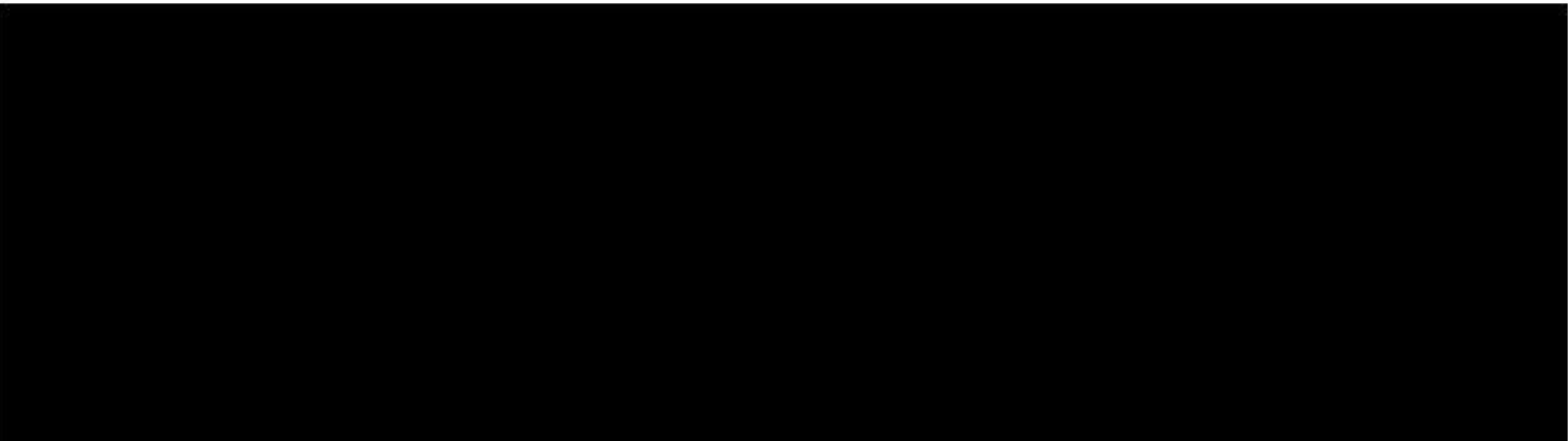
1. i-Transports report on traffic movements is breathtakingly glib and contains many inaccuracies and omissions. These are their words: "vanishingly small impact", "impeccable

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.

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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 H2O 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.



28<sup>th</sup> October 2019