

To: Planning Services, Havant Borough Council, Public Service Plaza, Civic Centre Road, Havant, PO9 2A  
Email : [planning.development@havant.gov.uk](mailto:planning.development@havant.gov.uk)

To: Havant Council

Re: **Planning Application APP/19/00427**

Planning Application APP/19/00427 (Bargate Homes application to build 50 houses south of Lower Road in Old Bedhampton)

Apologies for the late submission of this Objection (ie after the deadline date of 10 June 19) but I note from the letter posted to residents that you will still take into consideration comments received after the end of the consultation period provided no decision has been made.

My Objection centres around 2 documents posted to HBC web :

- 03 May 2019 Application Documents SJ/RS/ITB12174-005A R TRANSPORT STATEMENT
- 29 May 2019 Consultee Comment CONSULTEE COMMENT - HCC HIGHWAYS (HCC letter date 23 May 2019, ref 024645)

My objection is particularly with regard to the Transport Statement in that it contains serious errors and omissions that completely undermine its conclusions regarding the safety of the "shared surface" in Lower Road. This is the section with a blind triple bend with no footway.

Key paragraphs which are seriously in error include but are not limited to :

Para 6.8.4 of the TS states "Pedestrians are observed to almost universally walk along the western side ....". This is demonstrably incorrect and there is video evidence to prove it is incorrect. The dangerous consequence is that para 6.8.5 only assesses forward visibility on the western side – stated to be around 30 m. It completely ignores forward visibility on the eastern side which is considerably less – only around 5 – 10 m. This means that even the stated 85<sup>th</sup> percentile of 21 mph means a collision with pedestrians / mobility scooter is a near certainty. The only reason a tragedy has not happened yet is that drivers can be observed to regularly perform a "swerve manoeuvre" to swerve around pedestrians on the apex of the blind bend on the eastern side. That this manoeuvre has averted an accident to date is only due to there having been no oncoming traffic at the time. With the increase in vehicle traffic from the proposed development plus the ever-increasing cycle and pedestrian users from the surrounding new developments which will use Lower Road (as acknowledge by the TS), this will not continue to be the case.

Para 6.8.5 – Major omission : It excludes a forward visibility assessment on the eastern side

Para 6.8.8 – the once-in-56,000 is a gross statistical error. The correct figure requires some detail calculations but it is orders of magnitude lower. These calculations will be carried out in the very near future but it is immediately apparent from additional video recording data taken by the author of this objection in 2016 and passed to HBC at that time that the figure stated is completely wrong.

Para 6.9.5 and para 6.9.6 in the Summary section state incorrectly that the shared section of the triple blind bend will continue to be "a quiet and safe environment" and that the impact "falls well short of the "severe" test set by the NPPF".

My Objection text above already indicates that 6.9.5 and 6.9.6 are incorrect. The process I offer to prove these (and other statements) are incorrect is as follows :

- 1) Provide a copy of this Letter to HCC Highways, adding in additional, verified data to support this letter
- 2) Prepare, with support from a mathematician and mathematical modeller at Bath University, correct statistical data, with traceable calculations for HCC to examine and verify. I will also be supporting this process. My own qualifications/experience to support this work are : Hons Degree Physicist and Chartered Engineer (CEng, IET) plus 12 years as a science manager at a UK Government Measurement Science Laboratory.
- 3) After review of the new data and calculations, request that HCC Highways provide a supplementary Consultee Response which I believe will support the expected key conclusions:

#### Expected Key Conclusions :

- The shared surface around the blind triple bend in Lower Road cannot safely accommodate the increase in vehicle traffic from the development particularly when the extra predicted pedestrian and cycling traffic from the surrounding new developments outside Old Bedhampton are taken into account.
- Although the author of this note believes the development should not go ahead for many reasons, should planning permission be considered, it is imperative from a safety of life consideration that the shared surface around the blind triple bend is re-engineered. For example, this might mean reducing the width to permit only single vehicle passage on the section without footway and poor sightlines with the usual "Give Way to Oncoming traffic" priority arrangement. In addition, pedestrian refuges could be provided to permit safe pedestrian passage through the sections without footway.

My only Objection to the HCC comment letter is that because, understandably, it relies on data given in the TS which is now known to be both incorrect and incomplete, the comments in the HCC letter will need revision when full correct data and correct calculations are supplied.

**Request to Havant County Council :** Please, in view of the priority that must be given to safety of life considerations, do not give planning permission to this development until HCC Highways have been able to re-examine its response after reviewing additional, more complete traffic recording and correct statistical calculations. By far the most appropriate response is to delay any decision until a full Examination in Public has taken place, which is planned to take place for the Draft Local Plan (2036).

