

To: Planning Services, Havant Borough Council, Public Service Plaza, Civic Centre Road, Havant, PO9 2A

Email : planning.development@havant.gov.uk

Date : 11 December 2020

To: Havant Council

Re: Objection to Planning Application APP/20/01031 (Bargate Homes "Revised" application to build 50 houses south of Lower Road in Old Bedhampton)

I wish to object to the above planning application which should be refused planning permission. I have reviewed the amended plans (ref. Havant Council notification of 7th October 2019) but it is clear that as previously, what little benefit, if any, exists to this development, it is greatly outweighed by the harm it would cause. This includes the severe risks to safety of life from the sole access route around a narrow, blind, triple bend with no footpath, directly adjacent to an elderly persons Care Home (The Lodge, part of the Manor Trust Charity) of which I am a Trustee.

In particular, the recently expanded Conservation Area of Old Bedhampton will have its setting and character irreparably damaged if this development which will substantially increase traffic through the Conservation Area is allowed to proceed.

Also, the historic track known as Narrow Marsh Lane which may even be determined to be a Public Right of Way, is being obliterated by the proposed development.

I wish that the objections I raised to the previous Planning Application APP/19/00427 are taken into account in this latest Application and I include them below. However, I would add further important comments:

The Application APP/19/00427 was unanimously rejected by the HBC DMC in March 2020 of this year on the basis of the harm to this special area outweighing any benefit of this small number of dwellings. The proper, legal process of appeal against this decision is proceeding and is to be heard in February 2021. In the meantime, the whole Local Plan is nearing its Examination in Public where the inclusion of the Lower Road site could be called into question.

Why are Havant Borough Council facilitating this Abuse of Process? In this respect, for once I do not blame the Developer. They are just trying to make money any way they can. I do blame HBC for allowing this application to even be registered. Havant Council are supposed to serve the residents of the borough, not the other way round. Registering this Application, in the middle of Lockdown, just approaching Christmas almost seems designed to mislead residents who will rightly be otherwise distracted. Residents are aware an Appeal is happening and that this is correct, due process. How can they possibly be expected to know that this parallel application, with just the most minor of cosmetic differences has been slipped in to try and subvert the whole Appeal process.

Many residents have spoken to me privately casting doubts about the integrity of HBC and/or its staff - and that is putting it politely. In the past, I would have defended HBC

against such allegations. In view of HBC actions in allowing this to be registered, I'm finding that defending HBC is very difficult to do.

Why are we now expending yet more time and HBC resources on another application from Bargate which contains only cosmetic changes and still does not and cannot address the main objections of causing irrevocable harm to the village of Old Bedhampton?

The overview of my objection to this planning application is that it is in severe conflict with many of the key priorities and policies described in the current Havant Local Plan against which HBC must, in according with proper statutory process, assess this planning proposal.

My objection is structured as follows:

- 1) A Reference Overview of Old Bedhampton with special reference to the dangers presented by the proposed entry and access to the site via Lower Road. The document includes detailed traffic monitoring data. (The veracity of this document, including the traffic monitoring data can be established via a legal commissioner for oaths which the author is ready to undertake at their own expense.)
- 2) A step-by-step reference to the current Local Plan (Specifically, the Core Strategy, adopted March 2011 with reference where appropriate to the Local Plan Housing Statement (LPHS) of 7th December 2016. This will refer quite specifically (page nos, paragraph nos, Policy Nos, etc) to all sections of the Core Strategy where the above proposal is clearly in conflict, cannot be mitigated and should therefore be rejected.

1) Reference Overview : Lower Road and access Issues relating to safety, cycling and elderly pedestrians and children

The only vehicular access to and from the proposal site on the field south of Lower Road and to the existing 80 dwellings in Lower and Lodge Road(s) is via a very hazardous, narrow section of Lower Road, within the Conservation area. Access from Brookside Road means negotiating 3 right angle bends. The first bend has restricted visibility and the second and third bends are "blind" with virtually no sight line around them. Between these two blind bends there is no pavement and no room to provide pavement as the road boundary is up against the boundaries of the existing conservation area dwellings which include high hedges on one side and a brick boundary wall on the other. Nor is there room for a cycle lane, despite it being designated as National Cycle Route 22.

The access to the site and all the 80 (exact count) existing dwellings in Lower Road and Lodge Road is a vehicular cul-de-sac. All vehicles entering have to exit the same way. Hence pedestrians, which include parents with pushchairs and young children, dog walkers, unsupervised schoolchildren on foot and on bikes, elderly persons from the two types of residential homes situated between the blind bends, leisure and commuting cyclists, etc, are mixed in with no shield against vehicles such as cars, delivery vans and lorries which are often travelling at significant speed around the blind bends.

The writer of this document has lived at the exit point of these bends for 30 years and can personally attest to this fact and has himself experienced many near-misses. Other residents have also supplied signed statements of the many near misses they have also experienced.

Figure 1: The photograph below taken in September 2018 as a large lorry negotiates these bends on the area with no pavement is shown below and illustrates the dangers highlighted above:



The Lodge elderly persons care home is in the middle of the 2 blind bends, just on the left of the lorry in the photograph. Staff, visitors and ambulances (See Figure 4) which regularly drive into the care home car park have to turn right, across the road close to the middle of one of the blind bends. This would be directly across the path of the lorry in the photograph shown in Figure 1. This could – and sometimes will - be happening at the same time as the cyclists and people on foot as described above are occupying the same piece of road.

There is a further building called “The Elms” which is Grade 2* (star) listed which is also on the blind bend and situated right next to The Lodge care home. It houses 6 residents in flats, all currently active, older people.

Increases in Vehicle Traffic :

If planning permission was granted, 50 dwellings would be added to the 80 current dwellings, making 130 dwellings in total, an increase of 63% within the vehicular cul-de-sac. All the extra vehicle traffic will have to pass through these blind bends, along with extra pedestrian and cycling traffic.

Whilst it is not possible to say with certainty what the increase in vehicular traffic would be due to this development, a pro-rata increase comparable to the 63% increase in dwellings would not be unreasonable. In fact, there is good reason to consider this might be a significant underestimate. This is because whilst there are currently relatively few families with children in the existing 80 dwellings, this may change with time and the new houses may be expected to house a significant number of families with young and school age children. Hence this will result in further car journeys to schools and nurseries. The nearest public transport (bus stop) is 450 metres away and cannot be brought closer.

The dangers outlined above around the blind bends means that parents will be even less likely than at present to put even their older children at risk by allowing them to walk to

school, even to the bus stop 450 metres away.

The hazards faced by the current population of school children on bikes around the bends has been described above, despite the route being designated as national route 22, they are completely unprotected.

Expected increases in Pedestrian and Cycle traffic :

- Although it is a vehicle cul-de-sac, Lower Road does provide through access for pedestrians and cyclists in particular from the Rusty Cutter roundabout. It is designated as national cycle route 22 which provides access to surrounding areas and on to Portsmouth and Chichester. With the general increase in housing described in the Plan there will also come an increase in cycle traffic along Lower Road.
- One particular source of the expected – and welcome - increased cycling and walking is from the proposed H14 site, known as Forty Acres in HBC's new Draft Local Plan. This is a substantial potential development of 320 dwellings and a care home and is quite close, only 280 metres from the start of the Lower Road pedestrian and cycle access entry point. Once safe access across the Rusty Cutter roundabout has been established, Lower Road provides an immediate, tranquil and convenient through route to Havant and beyond, avoiding the very heavily congested traffic along Bedhampton Hill.

Hence a significant proportion of walking and cycling residents from Forty Acres, when it is developed, may be expected to head down Lower Road into and through Old Bedhampton Conservation area. A significant sub-set of these residents will be leisure walkers and dog walkers. Lower Road provides this important group with delightful access to Old Bedhampton Conservation Area, but also leads on to the attractive Solent foreshore and longer walks via a relatively recent purpose-built footbridge (also for cyclists) over the busy A27 Dual Carriageway to Broadmarsh foreshore.

All of the above factors are central strategies promoted within the current HBC Core Strategy, and further emphasised in HBC's new Draft Local Plan.

Hence it is imperative that the safety of the existing and progressively increasing walking and cycling population, including parents with infants in pushchairs and school children from new developments such as Forty Acres and nearby developments going along Lower Road are not imperilled as they most certainly would be, by the increased vehicular traffic in Lower Road including the dangerous bends which would arise from H20.

The only remedy to avoid this is to deny planning permission for this proposal, At the very least, it must be referred to the Secretary of State via an Examination in Public so the various factors can be properly and independently examined, including the non-compliance to the current Strategy.

Traffic Count & Video Evidence of traffic around the dangerous Lower Road Bends

It is recognised that the true extent of the dangers to pedestrians and cyclists can only be properly assessed if some numeric data is obtained. Hence with the support of local residents, video monitoring of vehicle, pedestrian and cycle traffic was set up in October 2016. (see *Figure 2: Site of video camera*)

All the video evidence was saved, sent to Havant Borough Council and receipt acknowledged by HBC in December 2016. It is still available.

One particular 2 hour period on 26th October from 15.30 to 17.30 was analysed in detail. The results are presented in the section below this part of the document, and titled: **Lower Road VideoTraffic analysis Oct16**. The results and the video recording were sent to several Havant Borough Council officers and councillors and receipt acknowledged by HBC in December 2016. (NB for data and privacy protection, no individuals can be identified in the video recordings.)

A total of 83 vehicle movements were counted in one hour between 16.30 – 17.30 during the 2 hour analysis period. This figure has particular significance when examined in relation to the Hampshire Transport Plan, one of the documents from other periods examined, this was not untypical for a late afternoon. This figure included 27 cyclists, many of which were school children on bikes. Also 21 Pedestrians (not included in the figure) were observed walking round the blind bends during this period.

18 potentially hazardous traffic incidents were also recorded in the period. Full details are given in the Ref. Doc. but a sample of these is as follows:

- 3 cyclists together occupying much of the width of the road, and who have just come around the blind bend (*see Figure 3: 3 cyclists across road*)
- 3 cyclists, with 2 together on the wrong side of the road around the blind bend.
- 2 separate examples of a lady pushing a pushchair containing an infant around the blind bends
- Several dog walkers
- Mobility scooter meeting cyclist head-on
- Ambulance across the road in the middle of the blind bend, accessing the elderly persons care home (*see Figure 4: Ambulance across Lower road*)



Figure 2. Site of video camera



Figure 3. 3 cyclists across Lower road



Figure 4. Ambulance across Lower road at The Lodge, Elderly Persons Home

Title : *Lower Road VideoTraffic analysis Oct16*

Video Summary – Lower Road

Total cyclists, cars, motorbikes, commercial vehicles

Video Elapsed Hrs/mins to convert to BST

(Example: to view video of peak of 83vph at 4.30 to 5.30 pm, start at 21hrs 20 mins into the video)

11:50 12:20 12:50 13:50 14:50 15:50 16:50 17:50 18:50 19:50 20:50 21:20 22:50

British Summer Time (BST)

Date	Video No	07:00 to 08:00	07:30 to 08:30	08:00 to 09:00	09:00 to 10:00	10:00 to 11:00	11:00 to 12:00	12:00 to 13:00	13:00 to 14:00	14:00 to 15:00	15:00 to 16:00	16:00 to 17:00	4:30pm to 5:30pm	17:00 to 18:00	Notes
Weds 26 Oct 2016	14	TBA	62 vph	64 vph	TBA	TBA	TBA	TBA	TBA	TBA	TBA	78 vph	83 vph		Figure INCLUDES 27 cyclists but EXCLUDES 21 pedestrians

vph = vehicle movements per hour (vph)

TBA = Still to be assessed

Note : The above traffic data should be considered with the data described in the Consultation Submission by Hampshire County Council. Letter by Ray Alborough, Hampshire County Council Economy, Transport and Environmental Department. Dated 23 May 2109, HCC Ref 024645. This letter states that Lower Road currently operates as a shared surface. The additional traffic monitoring data presented here shows that the preliminary conclusions in the HCC letter cannot be sustained, most emphatically so when related to Hampshire County Councils Transport Plan Policy Objective 9 (Shared space) – see section 2, ref to HCC Transport Plan below in this document

Traffic Analysis Detail - Incidents			Date: 26-Oct-16, Analysis Start Time: 15:30, Analysis Duration: 2 hours
Incident	Elapsed Hrs/mins on video recording	Time of Day (BST)	Additional Traffic Safety Risk Events on blind double bend with no footpaths (additional to vehicle & cycling traffic)
	20:20:00	15:30	Start of Analysis Period
1	20:30:00	15:40	2 children on push scooters with adult heading towards bend (see Item 3 below)
2	20:30:00	15:40	Cyclist + pedestrian walking abreast with another cyclist meeting car in the road.
3	20:31:00	15:41	See Item 1 above; 2 Children on push scooters with adult walking in road around the bend (1 event)
4	20:51:00	16:01	2 Adults walking in the road around the bend
5	20:58:00	16:08	3 cyclists, together all abreast coming around the bend
6	20:59:00	16:09	Pedestrian walking around the bend, in middle of road with cars coming in both directions
7	21:15:00	16:25	Jogger coming from around bend in the road, with back to traffic
8	21:18:00	16:28	Pedestrian walking in the road, around the bend, back to traffic, using mobile phone
9	21:21:00	16:31	Vehicle from Elderly persons home reversing into road
10	21:25:00	16:35	Lady pushing child in pushchair in the road
11	21:26:00	16:36	Pedestrian walking in the road, around the bend, his back to the traffic
12	21:29:00	16:39	2 pedestrians walking dogs in the road
13	21:37:00	16:47	Lady pushing child in pushchair in the road
14	21:39:00	16:49	2 Pedestrians walking abreast, in the road, around the bend, backs to the traffic
15	21:47:00	16:57	2 Pedestrians together, walking abreast, in the road from around the bend; one walking a dog
16	22:05:00	17:15	Mobility Scooter meets cyclist head-on in the road
17	22:09:00	17:19	2 Pedestrians walking 2 abreast in the road, their backs to traffic meeting cars on the road
18	22:11:00	17:21	2 Pedestrians walking widely abreast across the whole road, around the bend
19	22:13:00	17:23	1 Pedestrian in Road
20	22:13:00	17:23	2 Pedestrians in the road, walking abreast
21	22:15:00	17:25	2 Pedestrians in the road, walking abreast
22	22:16:00	17:26	Cyclist in the road pushing his bike around bend
23	22:17:00	17:27	Cyclist, on wrong side of road, with friend walking alongside in the road
24	22:17:00	17:27	3 cyclists; 2 together on wrong side of road
25	22:18:00	17:28	3 cyclists, together all abreast across the full road width going around the bend
	22:20:00	17:30	End of 2-hour Analysis Period

2) Step-by-step test of the proposal tested against the current the Adopted Core Strategy showing where the above proposal is clearly in severe conflict, cannot be mitigated and should therefore be rejected:

- References below are to the current **Core Strategy**, page, paragraph and Policy numbers :
 - Page 22, para 1.44 states "It is essential that the Core Strategy is read **as a whole** when considering any planning application"
 - Page 20, Table 1.1 Forward Together aligned with the Core Strategy
1. Health and Well Being; 6. Caring for our Borough
 - Page 24, Policy CS1 Health and Well Being : subparas 7 and 8 : contrary to the Policy CS1, this proposal degrades the opportunities for increased cycling, by substantially increasing the vehicular traffic along the designated National Cycle national cycle route 22. In particular, by concreting over **Narrow Marsh Lane** and blocking access to the historic railway bridge, this proposal blocks a potential safe, non-vehicular cycle (and pedestrian) access to the Broadmarsh coastal area specifically mentioned in this Policy.
 - Page 25, para 2.08 emphasises the "first priority" of the Policy to be that of "...improving the opportunities for exercise for all age groups including children's play, walking, cycling..." This proposal would do exactly the opposite. Extra vehicular traffic from the development resulting in a 63% increase in dwellings served by Lower Road, all mixed in on a "shared surface" with elderly residents living in their specialised accommodation on the blind bends on Lower Road, plus children, cyclists and walkers would substantially increase the hazards to these groups. The total distance from this proposed site centre to the nearest bus stop is 450 metres and these groups would be at substantially increased at risk and unprotected for the majority of this distance.
 - Page 28, para 2.25 Walking and Cycling : This para notes HBC's concern that it is the only council in Hampshire where the use of footpaths has declined over four consecutive years up to 2007 as indicated in the Quality of Life in Hampshire 2008 report. This proposal with its increased vehicular traffic on existing footways and blocking of further potential footpath access to the countryside and coast runs directly counter to the objective to increase these activities.
 - Page 29 : para 2.27 : Identifies improvement to cycle route network as strategic; Quoting this section : "With safer routes an increase in cycling can have substantial benefits for health and reducing congestion. However, the number of accidents needs to be reduced significantly. For example, between 2003 and 2006 there were three fatal and 21 serious accidents with a further 200 resulting in minor injuries. A substantial number of accidents involved children". This proposal would do the very opposite and increase the dangers to cyclists, many of whom are indeed schoolchildren on there way to and from school along Lower Road, much of which has no room for pavements or cycle ways and in places is barely wide enough for 2 vehicles to pass (and only if pedestrians press themselves hard against the boundary wall on one side or the high boundary hedge on the other side of the blind bend as frequently happens).
 - Page 45 Policy CS5 Tourism, including para 3.56 : Quoting : " Policy CS5 encourages the provision of sustainable and small scale recreational opportunities for tourists and day visitors. These will be focused on the natural environment, seafront andetc.... schemes will be put in place as necessary, for example, information boards to help visitors understand the local area and its wildlife." Para 3.58 states "Broadmarsh would provide an ideal location for a Visitors' Centre, which could be used to promote and manage the area's environmental assets."
- The author of this Objection could not agree more!

Currently, Old Bedhampton and Lower Road provides safe cycle and pedestrian access for people in the wider surrounding area to access Broadmarsh – no cars required! This will be substantially harmed if this proposal was not rejected.

The rural area of wildlife around the conservation area Old Bedhampton, its listed buildings and safe footpaths to the coast including Broadmarsh represent a wonderful opportunity for the Council to implement its policy – but only if this proposal for 50 houses is rejected. As well as the dangers from vehicles, it would do irreparable harm to the setting, particularly taking into account that an extension to the existing Conservation Area is being considered. (mention Narrow Marsh Lane, old bridge, safe access to coast, possibly unlawful blocking of this access route by the landowner around 20 years ago – maybe in later heritage section. Time Travellers Guide, Old Bedhampton pdf on council website? I took my children for walks)

- Page 66 Policy CS111 Protecting and Enhancing the Special Environment and Heritage of Havant Borough

page 67, paras 7.03, 7.04, 7.05, page 68, para 7.06 (esp ref to Sites of Importance for Nature Conservation (SINCS) plus conservation areas), para 7.07 (esp reference to Bedhampton Springs)

Page 79, para 7.12 refers to the “**Havant Borough Townscape, Landscape and Seascape Character Assessment 2007**” This particular document lists “LCA 13: Historic Bedhampton”

The introduction states “Landscape Conservation Objectives” : The Landscape strategy in the Landscape Character Assessment for this area is to conserve and enhance the local character” It further states the SINC percentage to be 14.62%.

Taking all the above sections into account it is clear that this development of an urban development of 50 dwellings runs completely counter to all the objectives listed and should therefore not be permitted.

- Page 72, Policy CS13 Green Infrastructure + paras 7.21, 7.22, 7.23

Taken together, these sections of the Adopted Core Strategy, including the CS13 policy statement “Development proposals that adversely affect green infrastructure will not be permitted.....” all clearly demonstrate that permitting development of this site would not be in keeping with the adopted council policy.

Some specific points :

para 7.23 quote : “The idea of green infrastructure is that rather than seeing all these areas individually, they are seen as a whole, as a network and not just within a small area but in our area at a sub-regional level. Looking at the strategic scale means that the multifunctional properties of green infrastructure are appreciated rather than just seeing the spaces as being either for recreation or as a habitat for example. Links are made that will add value to the individual areas so that they provide wider community benefits for education, improving health and wellbeing through opportunities for maintaining and **creating a sense of place, sustainable transport routes, play, exercise and relaxation; wildlife habitats, flood management areas and local food production.**”

On the last point, the field subject to this proposal is has been and continues to be used for food production.

On the wider point in relation to Green Infrastructure, uniquely, the site forms an essential part of the setting of the Old Bedhampton Conservation Area, (which as mentioned, is being considered for extension). Lower Road itself, a historic sunken lane with its hedgerows and

as a shared space for children, cyclists, walkers and elderly people provides safe and peaceful access not only to historic Old Bedhampton but also to the coastal areas of Broadmarsh and beyond. The opportunity to re-open the footpath of Narrow Marsh Lane to further enhance this linkage must not be thrown away.

Any reasonable interpretation of the Green Infrastructure sections of the Council's adopted Core Strategy makes it clear that setting down an urban sprawl of 50 houses would cause severe harm and cannot be justified.

Pages 111, 112, Paras 9.19, 9.20, 9.21 all emphasise the importance of discouraging car use in any new development. This site, as well creating significant extra car use, would actively discourage the existing walking and cycling activities due to the increased mixing of vehicles with children, elderly persons and cyclists on the same shared surface.

- Page 114 : para 9.27 **Monitoring** : Quoting : " An important part of the Core Strategy is putting in place adequate processes to monitor implementation. It is essential to check that the Core Strategy is being implemented satisfactorily and to monitor whether the outcomes from its implementation are as intended." This para is mentioned primarily to highlight the importance given in the Core Strategy that its provisions must be implemented and that this planning proposal as has been shown in the sections above and those sections below, is not compliant and must not be permitted.
- Page 134, para 10.28 Caring for Our Borough – The Coast and Natural Environment Policy DM8, Conservation, Protection and Enhancement of Existing Natural Features Policy DM9 Development in the Coastal Zone; 10.28 Quote "...The council recognises the importance of this unique environment and the need to protect and enhance it for both its nature conservation value and its recreation and public access opportunities....."
- These Core Strategy sections illustrate again that the proposed urban development of 50 houses runs completely counter to the stated need to protect and enhance. The substantial vehicular traffic increase from a 68% increase in dwellings served by the shared surface that is Lower Road will be severely detrimental to public access for the non-car community. Further, the insertion of an urban block of 50 houses right in the centre of the rural, historic grassland area which provides walking and cycling routes between Narrow Marsh Lane (accessible from Lower Road, but removed by this planning proposal) across to the coastal areas of Broadmarsh and beyond could only serve to degrade the local historic and natural environment.
- page 139, para 10.38 Historic Environment Quote : "The council has certain statutory duties in respect of the historic environment and even where no additional statutory controls exist, for example in the case of historic parks and gardens, the council should consider this as a material consideration in the determining of planning applications"
- The area of Old Bedhampton is unquestionably an area of historic importance and is demonstrated to be such throughout the Core Strategy sections referenced. Additional references include : Havant Borough Council's own document titled Old Bedhampton Conservation Area located at : <https://www.havant.gov.uk/sites/default/files/documents/Old%20Bedhampton.pdf>
- Also : As produced in Jan 2019 by the Bedhampton Historical Collection, "The Time Travellers Guide to Bedhampton Village" a 4 page guide to 21 different key points of special historical interest and celebrating the 200 year old link between Bedhampton and the poet

John Keats.

The council in accordance with its policies, must protect this historic and rural area and its setting. This proposal would cause significant harm and must not be permitted.

Transport

page 147, The Hampshire Local Transport Plan 2011 – 2031 : Policy Objective 9 :

“ Policy Objective 9: Introduce the ‘shared space’ philosophy, applying Manual for Streets design principles to support a better balance between traffic and community life in towns and residential areas”

Please cross refer the Note in the Video Monitoring evidence (Part 1 of this document) and the Consultation Submission by Hampshire County Council. Letter by Ray Alborough, Hampshire County Council Economy, Transport and Environmental Department. Dated 23 May 2109, HCC Ref 024645. This letter states that Lower Road currently operates as a shared surface.

In fact, the government has recently abandoned the concept of “shared space” owing to the increase in accidents in areas trialled and in any case, Manual for Streets was not intended to apply to historic, rural roads with blind bends and without pavements but rather straight roads, often in historic town centres. Even if it did apply, the governments own figure recommended a maximum capacity of 100 vehicles per hour (vph). The actual, verifiable video monitoring data presented in section 1 of this document shows that 83 vph has already been reached (including cyclists) before the substantial further increase which can be expected from the 63% increase in dwellings which would all be served by Lower Road if this proposal were to proceed. Without doubt, the proposal would lead to much greater traffic on Lower Road, than the 100 vph guidance limit referred to in Manual for Streets. Nevertheless work has stopped on creating such streets for safety reasons and if it did apply the forecast of future traffic volumes would rapidly exceed the former recommended capacity 100vph when it becomes no longer safe.

