

Regarding App/19/00427: Land at Lower Road.

Introduction:

I have been involved in the issues surrounding development proposals at Lower Road for some years. This is inevitably a personal statement but has been informed by interaction with residents who have been involved with Save Old Bedhampton and later the Bedhampton Heritage Alliance over a considerable time and some less so but are equally committed to protecting the heritage assets of this area.

The statement looks at some of the agents' reports. Other residents have covered issues arising from those not mentioned here e.g. highway matters.

Terence O'Rourke: Heritage Statement.

- 1.1. The introduction of this report (para 1.1) fails to acknowledge the importance of the setting of the Conservation Area. The adjacent buildings do not include the mid 20th century houses (para 1.2). These are opposite the site. The adjacent buildings are the farm cottages, which are not mentioned and are missing from the photographs.
- 1.2. Despite having two historic maps in Appendices 2 and 3, which clearly show Narrow Marsh Lane an ancient public thoroughfare that runs through the development site, the report (para 3.8) makes no mention of the significance of this. Its origin is not as not as a farm track (para 4.5). It served as one of the important links to Langstone Harbour and the coastal salt marshes, where, on the shoreline, remnants of the link to the deeper water landing remain. A lane Important enough to require a bridge when the railway was built. It predates farm enclosures.
- 1.3. The proposals do not "make a feature of it"(para 4.5). They destroy the northern section of it. This will inflict **irreparable harm** the setting of the Conservation Area. No '*clear and convincing justification*' has been provided for this (para 2.4, which quotes para 194 of the NPPF 2019).
- 1.4. {Why does the report refer to other versions of the NPPF?}.
- 1.5. The Local Plan (Allocations) adopted 2014 (para 2.7) should be read in conjunction with the Inspector's specific findings in relation to this site. When, despite the inclusion of Policy DM20, she felt that any benefit from development here would not outweigh the harm to the conservation area.
- 1.6. Paragraph 2.9 quotes the Draft Local Plan 2036 Policy E13 'Historic Environment and Heritage Assets' which states that
"Development proposals will be permitted which:
 - a. Protect, conserve and where possible, enhance the significance of designated and non-designated heritage assets and their settings:

- b. Respect heritage assets and their contribution to local distinctiveness and sense of place; and*
- c. Make sensitive use of heritage assets, especially those at risk through regeneration and re-use."*

The report fails to explain how the development will do any of these.

- 1.7. Recent study has suggested that the network of ancient roads and lanes throughout the area, including Narrow Marsh Lane, may predate the settlement itself by as much as 1,000 years and that, because of the strategic position, first 'shelters' may have been located in Lower Road (formerly Summer Way) in the proximity of the present farm buildings. This interpretation would precede the account in para 3.2.
- 1.8. Para 3.5 refers to The Elms. It fails to acknowledge its Grade II* status. The 'mock' tower has only two facades; one of which faces southwards indicating the significance of approaching from this direction, which is particularly noticeable during winter months. This is the closest heritage building to the site. It is less than the distance shown in the table on page 6.
- 1.9. Para 3.14 recognises the absence of traffic contributes to the rural character. Of course the reverse is true. Additional traffic will erode this character.
- 1.10. Para 3.16 suggests that the dominant character of the setting of the conservation area is of 20th century suburbs. This is misleading. A sweep of open land remains around to the east, south and southwest of the Conservation Area and the only way to experience the area is to leave behind the development to the north and enter using one of the non-vehicular 8 entry points or the 2 way Brookside Road or single track Kingscroft Lane. The contrast is marked.
- 1.11. This paragraph notes the differentiation provided by buildings of large scale and architectural quality and the next paragraph notes the plot sizes and the boundary treatments. Finally, the character of the roads distinguishes the core from the suburban roads. Lower Road displays this rural characteristic and any change to this will harm the experience of moving into and out of the core. Nowhere is there an appreciation of the contribution made by the range of materials used on these significant buildings: different bricks, patterned brickwork, painted renders, stone detailing and boundary walls.
- 1.12. Why is the proposed development adopting a suburban approach of buildings of a similar scale with unified materials that do not complement those in the conservation area? The fact that previous expansion of the village has a suburban nature is not an argument for repeating this approach for present day place-making {Comments on the Design and Access Statement will expand on this}.

- 1.13. Paragraph 3.21 suggests that it is only once you reach The Elms that the character changes but this is not true. The east side of Lower Road on this approach from the west contains two dwellings of significant scale set in large plots.
- 1.14. Paragraph 3.22 refers to the belt of conifers that intrudes on the open aspect of this area. Whilst a precise date for this planting may not be known it is within medium term memory of local residents (approximately 30 years ago). It has no historic significance and is in poor condition and composed of non-native species. Removal would restore the open historic setting of the conservation area. Not only is this dominant from views within the setting but also from the busy adjacent railway line. Removal would remove this temporary visual intrusion and restore the integrity of the farmland.
- 1.15. The report (para 3.23) contains pure speculation concerning the location of the farm complex. The location may have more historic significance than the settlement of the village itself.
- 1.16. The 'hidden nature' of the conservation area (para 3.24) adds to the surprise and delight of finding this unique place, which is enhanced by progressing along the openness of Lower Road and its historic sunken lane attributes. The church is visible from the railway across Donkey Meadow (Mill Field). The approach from the west is every bit as important as that from the east (para 3.27).
- 1.17. The open land (para 3.26) is very important to the setting of the whole of the Conservation Area and the historic records show how much the use of this area was connected to the occupiers of the important buildings within the village. So too is the later important relationship between the farm buildings and cottages with the farmland they once served. This will be severed by the development.
- 1.18. Paragraph 3.27 emphasises the important of the survival of the route to Broadmarsh provided by Mill Lane. Narrow Marsh Lane provided another route to Broadmarsh over the railway. So it too should survive rather than be obliterated by the development. The rural character of the land south of Lower Road is maintained both sides of the shelterbelt. This aspect can be appreciated in views from the railway line and the elevated A27/A3M junction.
- 1.19. Local residents do not agree with the assertion (para 4.1) that they have been involved in extensive consultation regarding the design approach. Attendees at the public exhibition were met with agents presenting the material as having been agreed with HBC and the development itself as a 'done deal'. This resulted in residents adding their names to the petition against the allocation in the Local Plan and many remarking that they felt they should in no way help the developers achieve their objective. {More will be said on this in relation to the PDAS and the Statement of Community Involvement}.

- 1.20. The capacity of the proposed site access may be technically adequate (para 4.2) but it will change the character of this historic sunken lane from rural to urban. There is nothing in this report to indicate that the design of the access included any environmental assessment of any harm to the historic rural character of Lower Road. The movements generated by the development will increase, by 50% or more, and impact upon safety and the perceptions of safety through the blind corners of Lower Road, critically at the location of Grade II* The Elms. 3 serious accidents since 2014 at the mini roundabout on the B2177 suggest that it does not 'operate well'. A recent highway report, commissioned by HBC, suggests replacement of the roundabout with traffic lights regardless of the development of the Lower Road site. This is likely to result in rat running through the narrow Bidbury and Kingscroft Lanes of the majority of vehicles leaving the village wishing to turn eastwards. This will add further harm to the experience of tranquillity to be found in the Conservation Area.
- 1.21. Paragraph 4.2 also states that none of the verges that are recognised as important to character will be directly affected. Yet a pavement is proposed on the verge of Lower Road that, because of the restricted width available and change in level of the ancient hedge and its roots, may not only alter the character of the road but may also threaten the health of the hedge.
- 1.22. On what basis is the claim made in paragraph 4.3 that none of the listed buildings have a direct historical relationship with the application site? On what basis is it necessary to have a visibly direct view between buildings and land for there to be a relationship between them and for them to be a part of the same place making experience as one moves through an area and between them?
- 1.23. The immediate setting of The Elms includes the section of Lower Road in front of the property. Vehicular access to the site is not possible by any other means than to use this section of carriageway. HCC have taken recent steps (white line markings at the carriageway edges) to improve safety. No other safety improvements appear possible. An increase in peak hour movements of 50% or more is predicted and it seems likely that a similar increase will occur at other times. On what basis can it be asserted (para 4.3) that "There should be no change to the setting of this listed building and no affects are predicted"?
- 1.24. The distinctiveness of the site lies in its openness and farmland character as part of the extensive tract of such land that forms a coastal rural buffer to the wider area. This is unique in its nature and extent and provides as such it could be said to provide the most rather than the least distinctiveness (para 4.4). Without this open land the village would be swallowed up by surrounding development and lose the connection with its historic settlement.

- 1.25. The shelterbelt (para 4.6) is a recent temporary alien feature and should be removed to restore the openness of the setting of the village. Replacement with a mixed variety only reinforces the fact that this alignment has no historic basis as a field boundary. The main reason for any planting here is to provide screening, together with more boundary planting, to try reduce the extensive intrusive impact of the development on the surroundings.
- 1.26. Over time this could result in a 'solid block' of buildings and vegetation plonked within this otherwise open landscape setting to the whole of the Borough. An urban extension that relies upon no natural features to justify its placement. This will not be a 'localised change' that reduces the rural character (para 4.8). Its location within the middle of this extensive tract of farmland and viewed from rail and road to the south as part of the setting not just of Bedhampton but the whole Borough will inflict maximum harm.
- 1.27. This is not a 'natural development and progression' that protects the 'important historic narrative value and significance' for future generations (para 5.1). The site is more than part of the rural setting. It has its own mixed and varied historic role and contribution to the history of the settlement. As such it is a 'key component' that this report fails to recognise (para 5.2).
- 1.28. Paragraph 5.4 recognises that the site forms part of the wider rural setting of the Conservation Area. How can this result in a conclusion that "the proposals will not result in any degradation or detrimental change to the character or appearance of this heritage asset"? The NPPF recognises that harm to heritage assets occurs and any such harm requires a case to show how the benefits of any proposal outweigh such harm. It is not to suggest harm does not occur.
- 1.29. This paragraph goes on to outline measures needed to provide a 'sympathetic softer greener boundary' on all sides to 'provide an acceptable assimilation'. A clear contradiction with the above.
- 1.30. The soundness of considering development of the site is being challenged through the Local Plan process. HBC are also considering the Conservation Area Review. The public consultation on this is in the public domain. So too is the heritage consultant's independent report, which differs from the HBC quotation in paragraph 5.5. This report includes no contribution regarding these aspects. A decision by HBC on new guidelines is likely to be made in July and any consideration of the future of these heritage assets should await this outcome.
- 1.31. Finally paragraph 5.7 refers to three field parcels. There are not three but two and these are only defined by the recent shelterbelt. Moving through Lower Road the current experience of rural character to the south remains the same. The proposal will detrimentally affect the whole of this.

- 1.32. This is a poorly written report that fails to meet the requirements of objectivity, accuracy, consistency, thoroughness etc. and as such it fails to make any strong case to support the proposal e.g. despite the site visit taking place in January 2018 (para 1.2) there is no seasonal appraisal of the character and experience of the area when in winter distant views of significant buildings are available. Also there is no recognition that Lower Road forms part of a ancient network of sunken lanes (hollow ways).
- 1.33. Before any decision is made to support the application an updated heritage assessment should be made addressing the shortcomings identified above and correcting the mistakes and misrepresentations so far identified. The case for development has not been made.

Hedley Greentree: Design and Access Statement: Part 1.

- 2.1. The introduction suggests that there have been numerous forums to determine the design. There have been only two involving the public, an exhibition and a presentation to the Council. For the reasons given in 1.19 above the exhibition served to show a degree of arrogance on behalf of the team of agents that rather than encourage any meaningful dialogue served only to impress upon the public how the proposals were already a 'done deal'. This meant that those attending were please to add their names to the local plan 1,700+-named petition to remove the allocation of the land.
- 2.2. At no time have the public been consulted on any planning brief for the land. Given the nature of the application design this raises a fundamental question regarding the whole approach to the design.
- 2.3. Page 3 also suggests that there is "a desire to provide a residential development of strong architectural merit". This raises the most fundamental question regarding the proposals "Does it?"
- 2.4. It is not true to say that the land has been the subject of possible future housing development for some years. It has been precisely the opposite. This is borne out in the report of the Inspector to the Local Plan 2026 (Allocations).
- 2.5. Whilst it is true to say that the Local Plan Housing Statement (December 2016) is material consideration, or more importantly the draft Pre-submission Plan, however the issue for the local planning authority is what weight to attach to this, particularly in the light of the challenges that have been made to the soundness of the draft on this particular site. The current Local Plan has the benefit of the Inspector's view regarding the Allocations. She specifically ruled out development here to protect the heritage assets.

- 2.6. The images shown on page 4 have no relevance whatsoever to the site. Those shown in 6,7 & 8 on page 5 clearly demonstrate the generally ordinary mundane nature of Bargate's house styles.
- 2.7. Page 7 fails to recognise that the Lower Road hedge is more than mature but also ancient and part of the character of the 'sunken lane' Lower Road. The agricultural access point is not in the west but the east.
- 2.8. The photographs on page 7 serve to show how little of the developments behind the Lower Road frontage are visible. The frontage dwellings are close knit and their elevated position screens the properties behind reducing their impact on views along the road. This is further illustrated on page 9. This characteristic is not reflected in the proposals. Large gaps along the proposed Lower Road frontage and the site entrance road allow views of dwellings to the rear and the approach down the elevated Lodge Road will also provide a vantage point exposed to a greater mass of development than the frontage alone. This is also true of views from trains and the trunk road network. The visual intrusion will be greater than simply the outer edge(s) of the site.
- 2.9. The aerial photographs on pages 7 & 8 not only show the position of the pictures but the strong presence of Narrow Marsh Lane. The analysis fails to include panorama views from the trains and the trunk roads when the development will dominate the foreground.
- 2.10. Narrow Marsh Lane is an ancient public thoroughfare, which is currently not usable because the landowner has blocked it. It may not be on the register of Rights of Way but this does not alter its ancient status (page 8). It is believed to predate the settlement itself. The need to register it and who, of the many users, would do so may not have seemed important at the time the ROW register was being compiled.
- 2.11. The contextual analysis on page 10 shows only properties north of the site. They form part of an arc of later development to the north and north west of the village. The development site would be the first major intrusion south of the village. The exceptions being the mill complex and the farm complex for obvious functional and economic reasons. It will fundamentally alter the nature of the combined heritage assets, land and buildings, here.
- 2.12. Page 11 identifies that the conservation areas attraction derives from the presence of 'character buildings' and the use of varied building materials. Bricks are varied in colour, sometimes used in patterns, coloured render is present in a number of places, stone detailing is used, as is flint and boundary walls dominate some parts of the street scenes. None of this appears to have informed the design!

- 2.13. Access to many of the identified amenities on page 12 is only really realistic by private transport. The location is not very sustainable and this may disproportionately detrimentally affect residents of the social housing who may be less able to afford such options.
- 2.14. A number of the bullet points on page 13 raise questions. Bullet point 5 fails to acknowledge the II* grade of The Elms. What is meant by the vague 'semi-natural open space' in bullet point 12? Is this maintained public open space or marginal set aside farmland outside the site? The question arises regarding the 'recreational area for dog walkers' and, if proposed, how is this to be connected to potential access routes outside the site? The same issue arises in bullet point 14 in respect of the vague reference to connections to Footpaths 30 & 107. Bullet point 15 picks up cycle route 22 but the implications for safe movement adjacent to the site arising from increased usage have not been picked up elsewhere in the application.
- 2.15. Page 14 suggests the analysis 'will' not 'has' informed the design. What is the truth of this? The site entrance 'has been fixed' (bullet 6) but this needs planning consent and the design affects the character of the road and safety on it and should therefore be subject to scrutiny. Will the existing narrow carriageway be narrowed even further at the entrance point? If no footpath works for the rest of Lower Road why introduce one to the east of the entrance in front of the hedge?
- 2.16. Is the new landscaping (bullet 9) really to increase biodiversity or is this a bi-product of needing to screen the entire development to try to mitigate its inevitable visual intrusion? What is meant by 'book end' in bullet 10? The site does not abut the conservation area. The narrow entrance/exit to the area at the western end of Lower Road creates a 'gateway' experience to the area reinforced by the farm buildings for those arriving and departing in this location. The development will not add to this.
- 2.17. On the key to the plan on page 14 important views into the site are missing. Is there an access to adjacent fields if so where and for what or whom? The railway bridge is shown as a footpath but elsewhere this is referred to as a farm vehicle only access and no right of way. What is the true proposal for this bridge?
- 2.18. Page 15 outlines the provisions of some of the NPPF but some are missing. The three dimensions of sustainable development are identified in para 1.3. One of the key ones here is the environmental one where damage to the heritage assets is paramount here but also social considerations impact when the relative remoteness of the location could place occupiers at a disadvantage for their accessibility. If the development is not sustainable with adverse impacts, which there is here, the presumption in favour of development (para 1.4) does not apply.

- 2.19. Given the number of dwellings proposed (50) the contribution it would make to overall housing delivery is relatively small and progress is being made on other nearby sites where the numbers of houses being delivered exceeds the intended targets. It follows that this site is not a 'key site'.
- 2.20. Where in this account of the NPPF is there any reference to the policies concerning heritage protection and enhancement together with the weight to be attached to this and the need to show that the benefits of any proposal outweigh the harm to the heritage assets?
- 2.21. Where in paragraph 1.8 is the recognition of the Inspector's specific comments in her report regarding the harm from the development of 15 houses here not being out weighed by the harm to the heritage? This is not the only report to accompany this application that fails to do this. It might be suggested that this has the hallmarks of a conspiracy to deceive the local planning authority but perhaps more importantly the public and the decision makers.
- 2.22. The same omission is true of paragraph 1.14 and nowhere on page 16 is there any recognition that, following consultation, this site was identified by HBC as one of three sensitive sites, which calls into question whether all the related constraints, set out on page 17, can be mitigated. This is reinforced by the challenges that have been made to the soundness of the Pre-submission Draft Local Plan 2036.
- 2.23. In the light of this, the suggestion in paragraph 1.20 that the Plan is likely to be afforded 'some weight' in the determination of a planning application might be better expressed as 'little weight'. Very few of the bullet points in paragraph 1.25 are 'Opportunities' most are 'Constraints'. Some of the opportunities are simply statements of what happens to be nearby.
- 2.24. Paragraph 1.28 states that the Heritage Report considers Policy E13. As seen in paragraph 1.6 above, it simply states this without any explanation of how the proposals meet this policy. The requirement to retain a 'village feel' by adding significant traffic throughout the village and by creating an urban site access and verge footpath will not be met. Again the Grade II* status of The Elms is not recognised.
- 2.25. Paragraph 1.29 confirms that the design code was not the subject of public engagement. Havant footpath 107 is narrow and cannot be significantly improved. Paragraph 5.05 of the adopted Core Strategy states "Excessively long paths between buildings, especially where the path cannot be viewed along its length from either end, should be avoided". This confirms that footpath 107 is unsuitable. Better signage will do little to increase its usage or its suitability. Visitors are likely to be focussed on access to the harbour footpaths and the development does not provide anything to assist this.

- 2.26. Placing the majority of the built development in the west of the site will create a greater visual intrusion on view of the setting of the conservations area from the A27/A3M and the railway (para 1.30ii). The relationship with the surroundings relies upon planting to screen the development on all sides. The need for this confirms the intrusive nature of the proposals. Moreover, because the majority of the proposed dwellings back onto the outer edges of the site occupiers who exercise their permitted development rights will introduce a whole range of additional visual clutter created by dormers, rear extensions, balconies, sheds, workshops, studios and boundary treatments. Despite any screening, much of this will still be visible from the road and rail vantage points.
- 2.27. Access to the rail bridge and Narrow Marsh Lane has already been compromised by the actions of the farmer in blocking this ancient public thoroughfare (para 1.30 vi).
- 2.28. Page 19 paragraph 1.33 refers to pre application dialogue with HBC. All of this should have been on a non-prejudicial basis and is not relevant to the determination of the application, which should be judged on its own content.
- 2.29. The 1994 conservation guidance referred to in paragraph 1.34 is out of date and the emerging guidance and the report of the independent heritage consultant are in the public domain.
- 2.30. Paragraph 1.35 refers to the conclusions of the Heritage Report but the quotation here cannot be found there. (Perhaps the author considered they could not draw this conclusion?) The latter part is contained in paragraph 5.7 but this refers to 3 parcels of land and not one divided by the shelterbelt. Placing the development in the middle of this tract of land inflicts the greatest intrusive harm. Regarding design, the quality will be judged elsewhere, it is not clear what aspects of the farm related buildings are being complemented. Is it the cottages or the conversion of the work buildings? The houses north of Lower Road opposite the site date from the mid not late 20th century.
- 2.31. A reference is made to the distance from the site to The Elms. If this matters, the boundaries are less than 100m apart but the visual connection is much less and the open and wide setting of the conservation area and the transition between these is part of its inherent character and sense of place.
- 2.32. The opening statement on page 20 fails to recognise that the site will only qualify for development in the Local Plan if it survives analysis in the Examination in Public.
- 2.33. Of the key planning issues identified here on pages 20 and 21 it is not yet clear if some of these have been addressed. This includes

- (i) The impact of traffic on the character and amenities of the area.
- (ii) The design of the site access and the rural character of the roads.
- (iii) The requirement for a 3m wide pedestrian/cycleway with a potential southward connection.
- (iv) The conflict between removing the shelterbelt and an assurance about TPOs.
- (v) The location of bungalows for those with mobility issues in the remoter parts of the site.

Hedley Greentree: Design and Access Statement: Part 2.

- 3.1. Page 22 suggests that the higher density is to the north of the site and not the west. From the layout this appears to be wrong. If the building density were higher along Lower Road, the resultant layout might be more closely knit, similar to the development opposite, and screen dwellings that sit further south within the site. The proposal does not mirror the pattern opposite as claimed on page 23.
- 3.2. The built form of the farm cottages and farm building conversion is of two short 3 terraces. Nowhere along the frontage of the site is this built form shown, as claimed on page 24. These buildings were erected as much as a century or more ago. Why in the 21st century would a modern development be built in this style? There is an existing planted boundary to the east of the cottages leading to the new dwelling at the rear. Why is it necessary to propose further planting and reduce the scale of the building on this frontage?
- 3.3. Errors on the layout such as hedgerows indicated that do not exist shown page 24 suggest that the designer does not know the site! What is the purpose of including this? Is it to show that the current poor design could have been much worse?
- 3.4. The revised layout on page 25 confirms the intention to expose the Lower Road frontage to greater visual intrusion by generous spacing. This does not reflect the farm cottages or conversion. Lodge Road falls to its entrance from higher ground. Approaching from this direction will result in an even greater exposure to the intrusion of the mass of the development.
- 3.5. The key building referred to does not appear to be 'special' It just happens to face the entry. Nowhere within the layout are there any buildings of scale set on generous plots that might complement those found within the Conservation Area.
- 3.6. There is confirmation of the intention to orientate as many dwellings as possible to back south and west. This will result in the future plethora of permitted development additions identified in 2.25 above. This could

apply to plots 26 – 39; plot 1 and plots 40/41/46/48/49 & 50. A total of 21 plots

- 3.7. What is the meaning of 'The development will have a rural feel'? It looks like any suburban development that dates from the mid 20th century. It has a regimented layout, no orchard gardens, no thatched roofs and no use of render or flints.
- 3.8. The layout completely destroys approximately 50% of the ancient Narrow Marsh Lane and makes no provision for the retention of the remainder. There appears to be no reason whatsoever to include a route for the landowner through the site when access remains available to both the land to the east and west and access to the railway bridge could be gained from the land to the east along the edge of the railway.
- 3.9. It should be possible to extend the curtilage of either plot 39 or 40, or both, to include an easement for the sewer over which no structures can be erected. Rather raise the prospect of further development through this gap.
- 3.10. Pages 28, 29 and 30 display Illustrations of flat fronted and flat backed boxes the majority under simple gable ended roofs with the only relief provided by canopies over the main doors. Brickwork appears to be of a uniform colour. It is not patterned. There is no render or decorative stonework. There is a proposal to use an outdated fashion of installing 'georgian' and cottage style glazing bars. There is nothing Georgian about these proposed dwellings and they are not cottages. The only traditional aspect of the design is that they are 'more of the same'. That is not any attempt at place making. There is some use of cheap timber cladding, which is fashionable at the moment but may date the development very soon. This is a very ordinary design. The dwellings have been described as 'Martini Houses'...."Any place, any time, any where"!
- 3.11. The frontage does not continue the built form from Manor Farm. It is totally different and on a different alignment and set back. Other than a verge and the short gardens, there is no landscape along the existing frontage. If what is proposed is 'meaningful' what is that meaning?
- 3.12. Page 30 refers to a bookend but this already exists at the pinch point of the farm building conversion. The experience of transition from open land into the village will be diminished by this proposal.
- 3.13. This is a stand-alone development proposal that will not integrate with the existing settlement. Surrounding the development with planting in an attempt to screen it will simply increase the degree of separation from the surroundings. It will create an incongruous block of non-descript housing that has eroded the character of the village and detrimentally affected actual and perceived safe movement for pedestrians and other non-motorised users of the historic roads and

lanes within it. It will destroy unique evidence of the pre-settlement network of access to be found here.

- 3.14. Pages 32 and 33 outline the landscape proposals and include references to multi-functional open spaces, a community orchard, children's allotments, semi rural areas for informal recreation but nowhere does it explain if these will be maintained by the residents management company and available to the wider public. Will the wider public have access?
- 3.15. The design principles include the protection and enhancement of the Lower Road hedgerow. Yet the proposed access does not do this.
- 3.16. The phased removal of the shelter belt will simply replace one non-native intrusive feature that spoils the landscape setting of the conservation area on an alignment that has no historic significance with another that happens to have native species in it. This has nothing to do with what is right for the conservation area. It is only a device to try to support the proposal.
- 3.17. The site boundary, shown on page 38, appears to extend into the carriageway. Is this so? Will the carriageway be narrowed? The plan shows a highway boundary running along the top of the historic earth banks at the foot of the gardens on the north side of the road. Is it proposed to do works within this area? If so, more of the character of the road will be lost. Again, if so, why does the red line not include this area and appropriate notices served on the occupiers?
- 3.18. The conclusion on page 40 suggests that the proposals 'form a strong sense of place and integrate this development into its wider surroundings'. Not much could be further from reality. This will be a place that clearly intrudes into the surroundings. It will not be a natural organic growth of the settlement. Existing residents will be discouraged from entering the area. The pre-settlement historic route to the harbour will be eliminated. The external impacts (traffic generation and on distant vistas of the coastal tract) of the development on the rest of the settlement will degrade the character and experience for both residents and visitors. It will tip the balance of the potential conflicts between motorised and non-motorised movements. Vehicles will dominate thus increasing safety concerns and actual risks of accidents.
- 3.19. The harm done by the development will not be outweighed by any limited benefits that might arise.

Terra Firma: Landscape and Visual Impact Assessment.

- 4.1. Remarkably, nowhere in this report is there any recognition of the historic nature of the landscape and the role it historically played in the founding of the settlement itself. There is no recognition of the ancient sunken lane character of Lower Road and the remaining presence of

Narrow Marsh Lane within the proposed development site. This is despite the evidence of the link to the landing in Langstone Harbour shown in Viewpoint 34 on page Figure 30.

- 4.2. This is similar to the situation found in relation to The Landscape Sensitivity and Capacity Study referred to in paragraph 4.2.1.1. This resulted in residents commissioning their own report specifically picking up these elements. This has been passed to the Planning Policy Team.
- 4.3. Yet again another consultancy has failed to acknowledge the Grade II* status of The Elms (paragraph 4.1.2) There seems to be a common approach to downgrade the significance of this 'Havant Gem' (Pevsner's description). The relatively very small number of such designated buildings demands that they be treated with special care.
- 4.4. Paragraph 4.2.1 draws attention to Paragraph 170 in the NPPF and the need for 'protecting and enhancing valued landscape'. Part of the value of this landscape is its historic significance, which has been not even recognised.
- 4.5. Paragraph 4.2.2 refers to the Core Strategy and the 5th bullet point of Policy CS16 that requires "responding to existing feature of...historic or local character". The sunken lane character of Lower Road derives from its historic origins and so too does Narrow Marsh Lane. Both of which do not feature in this report.
- 4.6. The 1994 Conservation Area Guidance (para 4.2.5) is out of date. Reference should be made to the current situation and the HBC and independent consultant's reports that are in the public domain.
- 4.7. Paragraph 4.3.5 contains the requirement to 'relate to the character of the historic core'. The core has detached buildings of scale in similar sized plots built from a variety of materials. The proposals bear no relationship to this at all.
- 4.8. Paragraph 4.3.8 bullet points 9 and 10 confirm that the guidelines seek to avoid 'suburban style estates' and to encourage the use of locally distinctive materials. The proposals ignore these guidelines.
- 4.9. The noise impact from the A27/A3M is not found in the east (para 8.2.1).
- 4.10. The conclusions include the claim (para 13.1) that the Lower Road hedge management will be enhanced. This is totally unproven. Experience to date with resident management companies is far from satisfactory.
- 4.11. The site is far from 'well enclosed' (para 13.2). It forms part of a long tract of open rural coastal land that is only interrupted by the shelterbelt. The setting of the Conservation Area would benefit from its

total removal. It is only the screening of the proposals that might benefit.

- 4.12. It is not a matter of seeing from where different parts of the settlement can be seen or not seen. The sense of place derives from passing through the area with views unfolding or disappearing as you go.

L-P Archaeology.

- 5.1. This report was prepared in October 2016 but no more recent update is included. Much has happened since then and the Local Plan has progressed since the statement in paragraph 2.2.5. The circumstances regarding the Conservation Area guidance is also in the process of change and this too is not reflected in the report.
- 5.2. It is noted that the report fails to identify the significance of Narrow Marsh Lane, which is more than a track (Plate 2).
- 5.3. It is noted that the quality of the report has been challenged by the County Archaeologist and it is understood a way forward has been agreed that reflects his concerns.
- 5.4. Investigations surrounding the Conservation Area Review have recently revealed an opinion from a landscape historian, who has studied the whole of Hampshire, regarding the ancient history of the area. He suggests the sunken (hollow) lanes, including Lower Road, and Narrow Marsh Lane are part of a highway network that predates the settlement possibly by as much as 1,000 years. The area of the rural coastal tract would have been part of a pattern of seasonal usage taking advantage of natural resources to be found in the area.
- 5.5. The County Archaeologist has verified the reasonableness of this finding. It may affect the decisions regarding protection and enhancement of the setting of the conservation area and the heritage assets there. In the light of this determination of the application should await this outcome.

Luken Beck: Statement of Community Involvement.

- 6.1. The Executive Summary on page 3 starts with 2 bullet points that are inaccurate and misleading.
- 6.2. The first suggests that the initiative for development came from the Borough Council. In circa 2010 the landowner suggested the site be developed for 250 houses in response to a HBC call for sites. Although this meant the land was included in HBC studies, it was never proposed for development despite the landowner reducing the number of dwellings to 50 and then 15.

- 6.3. The second suggests that the Local Plan Inspector excluded the site in favour of sites elsewhere and that the debate at the Examination clarified issues for further consideration. Having been in attendance at the Allocations EiP throughout supporting the HBC case against development of this land I can verify that the Inspector's statement in paragraphs 70 to 72 of her report are accurate.
- 6.4. The summary does not recognise (bullet point 4) that pre application inquiries to the LPA are subject to caveats. These are set out in the letter to Mr G Beck from the HBC Case Officer Daphney Haywood dated 16th January 2018 in which, on page 1, she advises that 'only limited weight at this stage' can be afforded to the emerging Local Plan. This letter also confirms (page 2) that as the site lies outside the urban area it is contrary to policies in the Approved Local Plan. It recognises that 'historic asset issues may prove to be an overriding constraint to the development', which proves to be the situation.
- 6.5. Page 3 of this letter refers to trees on the western boundary of the site, which should be the eastern side. The poor condition of these trees proves to be a threat to the proposed houses rather than the opposite as suggested at the foot of page 6. Any potential to offer 'a significant landscape buffer' is negated by their short life expectancy and non-native specie.
- 6.6. The 3m wide cycle and pedestrian route southwards, mentioned on page 3, has not been secured.
- 6.7. The proposal does not protect and enhance a locally valued landscape through the planning system as required by the NPPF and noted on page 5.
- 6.8. Page 7 recognises the short right not left storage lane on the entry to Brook side Road. The existing Lodge Road footpath cannot be upgraded as envisaged on this page and currently has a cycle ban. The reference to Manual for Streets and shared surfaces does not apply to lanes with bends.
- 6.9. The landowner has only in recent history obstructed the 'agricultural access bridge'. The bridge was provided at the time of the railway construction to maintain this ancient public thoroughfare.
- 6.10. Page 11 refers to the mini roundabout junction and egress for eastbound traffic. The recent modelling of the highway network has suggested replacement of the roundabout with traffic lights. This could result in 'rat runs' through parts of the conservation area that do not experience the bulk of highway movements at present. This can only have detrimental impact on these areas and increase existing safety concerns not only as a result of the development but also during the construction period.

- 6.11. SCI Appendix 2 fails to include any detail of the deputations made at the DCF despite a copy of these being handed to the clerks at the meeting. An Appendix to these comments provides a copy of that given on behalf of Save Old Bedhampton.
- 6.12. SCI Appendix 3 includes the few representations made at the public exhibition. Anecdotal evidence suggests that this could be because those visiting from the general public were faced with an arrogance that suggested everything was cut and dried. Many did however seek out and add their names to the petition that was being compiled in response to the draft Local Plan to call upon HBC to remove the site from the Plan.

Conclusion:

- 7.1. Progress with the Local Plan and the Conservation Area Review is being made but is not yet in a position to fully inform the decision making on this application.
- 7.2. In this circumstance the application falls to be determined against the provisions of the Approved Local Plan together with any weight that might be attached to the emerging Local Plan and following the guidance in the NPPF.
- 7.3. The proposals are contrary to the Approved Local Plan and the specific findings of the EiP Allocations Inspector. The draft Plan has generated a great volume of challenges to the inclusion of the site for development and the impact these have for the soundness of the Plan. This means that any weight at all that might be attached to support a favourable decision on this application is likely to be outweighed by the weight against the development.
- 7.4. Moreover the NPPF makes clear that support for any proposal that affects heritage assets must be based upon the harm it does being outweighed by the public benefits it delivers. Note this is not the benefit to the developer but to the public.
- 7.5. The picture painted by the agents for this proposal appears at times to use smoke and mirrors. Some aspects are out of date. Some issues, as has been shown, have significant matters omitted or ignored. Some items are misrepresented. Collectively they have a major failing.
- 7.6. Not one agent appears to have examined the harm that will be created to the heritage assets and tried to show how there will enough public benefits to outweigh this harm. This is an extremely poor proposal and, perhaps to protect their professional reputations, the team involved felt they couldn't make this case. If so, all credit to them!
- 7.7. The application should be refused.

Appendix: Deputation on behalf of Save Old Bedhampton to the Development Consultation Forum 23rd May 2018.

SOB 5 minute presentation to DCF 23 May

Thank you. I have lived in Bedhampton for nearly 40 years. I am a retired Past President of the Royal Town Planning Institute. I speak on behalf of 'Save Old Bedhampton'. We are **not** anti housing. We are **pro heritage** protection.

The overall context is that the **whole** Council has a legal overriding duty to protect and enhance its heritage assets. This is **not** optional. The Council's default position is therefore to say '**No**' to any development that damages its heritage.

In accordance with the National Planning Policy Framework Inspectors have protected both conservation areas **and** individual buildings. For example, buildings like The Elms (Grade II* Listed), located on the blind bends of Lower Road and one of only a handful of such assets in the Borough and Nicholas Pevsner's 'Havant gem'.

Here are 8 **key** pieces of evidence of where we are today.

1. We have been here before. The Local Plan 2026 does **not** contain this site. The Inspector supported the Council and the residents to resist any allocation here. He specifically mentioned the detrimental impact upon the Conservation Area, arising from just 15 houses, as reason enough to say 'No'. This position has **not** changed.
2. The emerging new Draft Local Plan 2036 cannot be given much weight. It, and the supporting documents, have not yet been independently tested for **soundness** at an Examination in Public. There is therefore **no** sound basis of support, in principle, for the development.
3. The Landscape Capacity Study 2015, which, **without consultation**, suggested the site for possible development, is **flawed**. Our independent consultant has identified that it **fails** to recognise the historic nature of Lower Road. Also the intrusive nature of the shelterbelt and that this would be an over-powering neighbour to any housing. These non-native trees detract from the open setting of the Conservation Area. The study also **fails** to identify the impact of development upon the recognised tranquillity of the area.
4. The Housing Statement included the site but **it too** has **not** been tested for **soundness**. The Sustainability Appraisal was **flawed**. It identified that increased traffic **could** impact upon the Conservation Area but assumed **again, without evidence**, that it would not be detrimental. There was also **no** mention of the inevitable impact on safety.

5. The officers have the evidence, gathered by residents of traffic movements at the entry to Brookside Road and on the 3 blind bends of Lower Road. These show both the **existing** safety hazards on the lane and the capacity constraints on entry to Old Bedhampton.
6. The Borough's 'Summary of Screening Work', produced last December, recommends the following...(I quote)

"Due to the very sensitive nature of the location, historic asset issues may prove to be an overriding constraint to development. ...development has the potential to cause significant harm to the intrinsic character of the conservation area."

7. The heritage assets of the Conservation Area belong to the **whole** Borough **but** the council's current guidance is very outdated. A heritage consultant has been commissioned to update this. New guidance should be out for public consultation later this year. The consultant will review the evidence and significance of the historic setting and landscape surrounding Old Bedhampton and show how this contributes to its character and heritage. The experiences of arriving and departing from places help to make them unique.
8. The residents have submitted a petition calling upon the Council to **remove** the site from further consideration.

In conclusion, I hope this provides an overview of reasons for all parties to avoid any precipitous decision.

Wait until the results of the petition,

Wait until the outcome of the conservation area review and

Wait until the Examination in Public.

We find it hard to see how the **irrevocable harm** to the Conservation Area and The Elms will be outweighed by **any** benefits from inappropriate development.