

Deputation from Bedhampton Heritage Alliance (BHA) re APP/21/01071.

BHA appreciate the comprehensive officers' report and support refusal of the application. Nevertheless, there are outstanding concerns that together cumulatively tip the "Planning Balance" suggesting additional reasons for refusal.

The failure to follow recommendations for a full application adjacent to the Conservation Area means that **guesswork** is needed to determine how, and if, the application delivers **quality placemaking**.

Confusion exists whether the layout will have a rural or urban character. On the initial entry road, the illustration shows continuous double bay parking spaces on the forecourts either side and no pavements ...a very hostile urban character for pedestrians.

The Conservation Officer considers the harm to heritage is "*less than substantial*". Whilst there is no direct harm to the Conservation Area itself, entry from Phase 1 drives through the approved buffer zone which forms part of the Phase 1 mitigation measures to protect the Conservation Area from harm. This exposure, together with the loss of the remainder of the rural setting to the west, without any mitigation, means the harm to heritage assets is **significant**.

House types are not yet known. Phase 1 demonstrates a range of gimmicky architecture including false chimneys, buttresses, and infill brick panels. BHA believe Bedhampton does not want more of the same placemaking?

More current significant unknowns include that the proposal does not meet the SPD requirement for visitor parking and the drainage and flood protection solution(s) which may require on site storage. The provision for both these elements may reduce the area available for houses.

The conclusion **must** be that...

The applicant has **failed to demonstrate** that the size of the development proposed (43 dwellings) can be satisfactorily accommodated at the site in a high-quality design without harm to the heritage assets and the amenities and environment of the area. This should form **a further reason for refusal**.

BHA continue to have concerns regarding safety on the blind bends of Lower Road. In particular, the applicant's misleading claim that these have "*an impeccable safety record*". Residents have years of experiencing regular encounters and near misses that are **not** recorded. Safe passage during construction is currently dependant on the presence of a banksman.

The approval of Phase 1 was based upon a mistaken analysis. The applicant's risk assessment was based upon probabilities that were wrongly combined to produce a statistically incorrect result. They claimed that two opposing vehicles will arrive at the same place (the narrow unpaved section within the middle of the bends) and time as a non-vehicular user is there once every 56,000 times the user passes along this section.

Members of Bath University confirmed this is based upon a statistical error (multiplying 3 probabilities together). By modelling the applicant's Phase 1 data, they showed this situation could occur **every other day!**

This finding was shared at the time but ignored by the parties concerned.

BHA believe this frequency clearly reinforces their safety concerns **and** provides a better appreciation of the detrimental impact upon amenity within the Conservation Area. This proposal will result in even more additional movements around the bends and through the heart of the Conservation Area adding to the harm.

Together these provide a measure of how much **more weight** should be attached to these impacts in the Planning Balance.

This aspect should be the subject of an additional **reason for refusal** or be added to the previous issues where *the cumulative impact of harms will not be outweighed by any benefits arising from the development.*