

**From:** Jenny Lawrence  
**Sent:** 12 May 2021 20:56  
**To:** Salter, Tim <TIM.SALTER@planninginspectorate.gov.uk>  
**Subject:** APP/A1720/W/21/3271412

Dear Mr Salter

I write to object in the strongest terms to the appeal against the planning decision made regarding the land south of Romsey Avenue in Portchester **APP/A1720/W21/3271412**.

These comments are in addition to the objections previously submitted by myself on 02 September 2020, 25 July 2019, and 21 October 2018. Please kindly ensure that my previous points are reiterated and still stand.

I object to this appeal on the following grounds:

1. Fareham Borough Council have a draft local plan ready for consultation identifying sufficient housing numbers to satisfy national target setting without the use of the site on the land south of Romsey Avenue. This land has been removed from the local plan as a result of the successful objections previously raised by residents and professional advisory agencies. This also appeases concerns regarding the nitrate pollution of the Solent caused by building on coastal areas.
2. The land selected is of the highest agricultural quality and the National Planning Policy protects building on this site. Due to the uncertain exit of the UK from the European Union it is important to retain the most valuable agricultural land to safeguard future supply chains. The challenges of global warming and the possible disruption to food production should also not be underestimated and further strengthen the need to protect this land.
3. This site provides an important ecological environment which supports plant and wildlife biodiversity. Natural England has described this site as 'being on the urban fringe forming part of a wider countryside gap of 40 hectares'. I have seen a wide variety of wildlife making use of the land, including a family of deer, foxes, geese, and a nearby nesting peregrine falcon.
4. The land has been described by the appellant as heavily influenced by urban development. This statement is demonstrably false. From my house on the far side of Romsey Avenue I can see across the field to wider countryside and over and across the Solent water which makes its way to Fareham Creek. My family and I are able to enjoy miles of walks in the area without encountering urban development.
5. In contrast to the appellant's statement that the development of the site will have no impact on Portsmouth Harbour as a special European site, Fareham Borough Council, Hampshire County Council Ecologists, and Hampshire Wildlife Trust all state that its proximity to the harbour would have a significant impact. To further compound this impact, the surface water run off will increase flooding in the recreation ground, causing disruption to the wildlife and local residents, and which in turn will directly pollute Portsmouth Harbour Special Protection Area.
6. This site has been identified as a Primary Support Area for Brent Geese and Waders. Brent Geese have been heard on the site in the early hours of the morning during February and March this year, likely to be associated with the spring tides. There is overwhelming evidence in the Solent Waders and Brent Geese strategy to support this. Concern has been raised by local residents that the farmer has changed their practices this year to discourage the use of the field by geese and strengthen the case for appeal so it is vital that evidence from previous objections on this matter is reiterated.
7. The mitigation strategy proposed by the appellant to minimise the impact on protected or priority species and provide a 10% net biodiversity gain is the same strategy which has, this winter, failed in Southsea. There are also no plans to support badgers, beavers, bats, deer, partridge, slow worms, or pheasants, who have recently seen their habitat reduced due to adjacent development of non-agricultural land. There is no way to mitigate for the destruction of habitat, and the idea that wildlife displaced by the lengthy, loud disruption of the construction of this number of homes will return happily once the development is completed is nonsensical.
8. National Planning Policy protects existing clubs and businesses from being shut down or having restrictions imposed by residents moving into new developments, so the appellant must accept the responsibility to mitigate the significant and noise and light pollution generated by the popular and well-used local club – AFC Portchester, based on the Wicor Recreation Ground. As both sound and light from the club are observable on Romsey Avenue this will not be possible on a site adjacent to the training ground and pitch. The club itself has also objected to the development of this land.

9. Concern remains over the impact on the safety of the local roads, which have not been addressed in an adequate way. No traffic surveys have been completed at the busiest school journey times, and any survey which takes place at this time would need to take into account that the local schools are operating staggered start and finish times, and any return to normal times would mean increased traffic in a shorter time window. Any development to this area would cause an increase in the volume of traffic along Romsey Avenue and Beaulieu Avenue in particular, which are already frequently busy, with residents nearest to the junctions reporting lengthy queues during peak times, reducing visibility and increasing the danger to those on foot and cycles, notably young families and school-aged children. The removal of some on street parking capacity would only compound the danger to the pedestrian users of the area. There are already times of congestion on the A27 entering Beaulieu Avenue, leaving cars unable to enter the 'turning lane', and there is further congestion towards Cams Hill each morning, which is a busy route for the local secondary school. Any increase in housing on this stretch of road will only increase current issues.

10. There are considerable surface water drainage concerns which have not been addressed by the appellant. The SuDS strategy has been described as 'overly optimistic' by water engineers and advisors. Failing to allow for any surface water run off to enter a stream or drain has been labelled as an 'unsafe concept.' The fact that the Soils Ltd investigation was conducted in July means there is no data relating to high winter and spring tides which see local land on the Wicor Recreation ground severely waterlogged. It is therefore likely that overflow will create additional flooding to the well-established flood zone impacting the (poor) mitigation strategy for protected and priority species, the local football ground and recreation area, and add pollution to the Portsmouth Harbour Special Protection Area.

Many thanks

Jenny Lawrence

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