

**OBSERVATIONS OF FAREHAM SOCIETY FOR INSPECTOR ON APPEAL
APP/1720/W/21/3271412 - APPLICATION P/18/1073 FOR 225 DWELLINGS SOUTH
OF ROMSEY AVENUE FAREHAM**

For its observations on this appeal the Fareham Society relies primarily on its letters dated of 11th June 2020, 6th November 2019 and 27 October 2018. These observations provide additional information, where necessary, to support the comments already made.

Highway safety

A considerable proportion of traffic leaving and entering the site would use the A27/Beaulieu Avenue junction. The A27 is a busy road in both directions and has a 40mph speed limit in the vicinity of the junction. A ghost right turn lane on the A27 facilitates right turns from the A27 into Beaulieu Avenue.

It is considered that increased traffic movements using this junction on such a busy road with high traffic speeds would be highly undesirable. This would especially be the case with right turns from Beaulieu Avenue as they would conflict with traffic using the ghost junction to enter this road from the A27.

Concerns were raised by County Highways, in its first observations on the application, on the increased danger that would arise from substantially increased traffic to cyclists travelling west on the A27 past the junction with Beaulieu Avenue on the on-road cycleway. The appellant sought to resolve this by providing an off-road cycle lane past this junction. However, a Road Safety Audit found that such provision would be unsafe and inconvenient as westbound cyclists would need to cross the junction between vehicles waiting to enter the main road and would need to give way to left turning vehicles which they may be unable to see. The appellant thus reverted to an arrangement that retained the on-road cycleway (Drwg. 5611.025RevC). This appears to have been accepted by County Highways. However, this runs counter to their initial concerns and no reason has been given for this. It is the Society's view that given the substantial increase in traffic using the Beaulieu Avenue/A27 junction that would arise from the proposed development, and the speed and volume of traffic on the A27, that the County Highways initial concerns were well founded.

Other impacts on the use of Beaulieu Avenue as the main access to the site

The Society accepts that the proposed provision of a lay-by for 12 cars on the eastern side of Beaulieu Avenue could potentially overcome concerns on the width of this road to cater for its increased traffic usage. However, it may be found necessary also to place parking restrictions on the eastern side of Beaulieu Avenue. As outlined by County Highways this would require Traffic Regulation Orders (TRO's) and, as they are open to public consultation, it could not be guaranteed that such restrictions could be made. Given that it is not yet known whether a TRO would be required a Grampian condition is unlikely to be appropriate. As such the proposed lay-by offers no certainty that Beaulieu Avenue would provide an acceptable means of access to and from the appeal site.

Beaulieu Avenue currently provides a reasonably quiet and peaceful environment for those living off it. County Highways indicated in its consultation responses that it was for the District Council to consider the impact of the additional traffic from the appeal site on local

residents' living conditions. There is no clear evidence that this has been done and the Society urges the Inspector to give careful consideration to the impact that substantial additional traffic would have on this currently relatively quiet residential road.

Moreover, provision of the proposed lay-by would be at the cost of substantial visual harm from the loss of the roadside verge.

Loss of on-street parking

To provide a safe access from the site onto Romsey Avenue would require TRO's restricting parking on Romsey Avenue and the link from this road into the appeal site. Visits to the site have shown both Romsey Avenue and the link road to be heavily parked up. It is far from clear that alternative parking spaces would be available, certainly reasonably nearby. This would cause inconvenience to those nearby and be detrimental to the living conditions of those living locally.

Ecological concerns

The Natural England consultation response, of 12 Oct 2018, made it clear that the development site is classified in the latest update of the Solent Waders and Brent Goose Strategy as a Primary Support Area. The guidance gives advice on off-setting and mitigation. It says that in Primary Support Areas off-setting areas should fulfil the same special contribution and particular function of the areas lost. Natural England have assessed what is proposed by the appellant in this regard and have found it would not comply with this requirement. It is the view of the Fareham Society that this should attract greater weight than the observations of the appellant.

The Society has two observations on the appellant's Statement of Case. First, the appellant's statement that that this is an "uncertain site" for Brent Geese and Waders is based on a Local Plan Policy dated 2015 which, it is taken, would precede the latest update of the Strategy relied upon in Natural England's consultation response. Indeed, the latest 2019 version of the Strategy clearly designates the site as a Primary Support area. Second, if the appellant is so certain that the site has no value as a habitat for Waders and Brent Geese why have such pains been taken to try to provide an alternative habitat for them?

Character and appearance

At the stage the application was a hybrid full and outline proposal the Society raised concerns on the layout to the houses on the full application part of the site. It was considered that they were too close to the highway. This was an inevitable result of too a high a density, and in the absence of sketch plans of the current proposal concerns remain on housing density.

The density of dwellings on the application site would seem to accord with those on the adjoining Cranleigh Road site allowed on appeal APP/A1720/W/16/3156344. An inspection of this site will show a cramped form of development with houses close to the highway and car parking dominating many frontages. This is not an attractive development and is of a density and form that does not merit duplication especially given the increased emphasis now on design. Moreover, the current appeal site is part of a much larger open area of land fringing Portsmouth harbour and providing an attractive backdrop to it. Poor quality development at too high a density would be harmful in short, medium, and long-distance views.

Final observations

The Fareham Society acknowledges the absence of a 5-year land supply in this District. However, in accordance with the NPPF the presumption in favour of sustainable development does not apply where, as here, the application of policies in the Framework that protect areas or assets of particular importance provide a clear reason for refusing the development proposed.

Thus, given Natural England's stance on the proposal the Society considers that the appeal should clearly be dismissed.

However, even in the absence of that harm the totality of the other concerns raised above would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

Submitted by R Marshall on behalf of the Fareham Society