

**T & CP Act 1990  
Section 78 Appeal  
APP/A1720/W/21/3271412**

**Land to the South of Romsey  
Avenue, Portchester Fareham  
Hampshire**

**Proof of Evidence  
David Wiseman**

**On behalf of  
Foreman Homes Ltd  
(The Appellant)**

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**APP2/2 DRAWINGS AND APPENDICES**  
(Under Separate Cover)

## **REFERENCE DOCUMENTS**

**Transport Assessment** (dated August 2018)

**Transport Assessment Addendum** (dated October 2019)

**National Planning Policy Framework** (February 2019)

**Manual for Streets 1**

**Manual for Streets 2**

## 1.0 INTRODUCTION

### **Qualifications, Experience and Instructions**

- 1.1 My name is David Wiseman. I hold a Bachelor of Arts Honours Degree and I am a Chartered Town Planner. I am a Member of the Royal Town Planning Institute (RTPI), I have over 35 years' experience in transportation and infrastructure planning.
- 1.2 I am a Director at Stuart Michael Associates (SMA), an independent consultancy that specialises in transportation and infrastructure planning, traffic engineering, road safety, flood risk assessments, civil, structural and acoustic engineering. I am personally responsible for the direction and management of part of the company's transportation services group.
- 1.3 I have acted previously for both private and public sector clients including major house building companies, County, District and Borough Councils. I have appeared as an expert witness at a number of Public Inquiries and Appeal Hearings.
- 1.4 I have been instructed on behalf of the Appellant (Foreman Homes Ltd) to consider and advise upon the appeal against refusal of outline planning permission by Fareham Borough Council (FBC) for a residential development of 225 dwellings on land to the South of Romsey Avenue, Fareham.

### **Planning Background**

- 1.5 An outline planning application (P/18/1073/FP) was submitted by the Appellant in 2018 to Fareham Borough Council (FBC). Significant work was completed in conjunction with Hampshire County Council (HCC) as Highway authority at that time to agree the scope of the Transport Assessment (TA) and the proposed off-site highways and pedestrian improvements.

1.6 The Officers Committee report for the application set out that “no objections were raised from a highways and transportation perspective, subject to the following Condition being included and the applicant entering into a Section 106 Legal Agreement to secure the following mitigation package:

1.7 A Transport Contribution of £1,126,252 towards the following:

- Improvements in the vicinity of Delme Roundabout (£12,323);
  - Improvements in the vicinity of Downend Road /A27 (£60,350);
  - Cornaway Lane Roundabout cycle improvements (£907,179);
  - Footway widening in the vicinity of the site (£18,000);
  - Walking audit measures (£37,400)
  - School Travel Plan (£85,000)
  - Beaulieu Avenue parking restriction TRO contribution (£6,000)
- 
- Payment of a Travel Plan approval and monitoring fees and provision of a surety mechanism to ensure implementation of the Travel Plan.
- 
- Implementation of highway works shown on drawings **5611.025 Rev C** and **5611.002 Rev D** prior to commencement of the development including payment of fees associated with progression of the TRO process. Any works requiring a TRO must be satisfactorily completed prior to commencement of the development.

Condition:

A Construction Traffic Management Plan shall be submitted to and approved by the Planning Authority in writing before development commences. This should include; a restriction on construction traffic vehicle size, restrictions on construction traffic movements during peak and school drop off/ pick up times, construction traffic routes (including a restriction for no construction traffic to use Hatherley Crescent or Cornaway Lane), parking and turning provision to be made on site, measures to prevent mud from being deposited on the highway and a programme for construction. The agreed details shall be fully implemented before the development is commenced.

Reason: In the interests of highway safety.

- 1.8. As set out in the officers report to committee (Core Doc:CDC.1), based on the consultation responses received upon the application and the Local Planning Authority's assessment of the acceptability of the Scheme in this regard, 'other' matters, it was not suggested that the scheme should be refused on Highway grounds. This reason for refusal was introduced by Council Members responding to local residents concern which resulted in the decision notice dated 21<sup>st</sup> September 2020 included the following highway reason for refusal.

Reason for Refusal C:

*'The proposal would result in extra parking restrictions being placed on Beaulieu Avenue and Romsey Avenue and on-street parking being displaced from the access road into the development site onto Romsey Avenue. As a result the development would lead to an increase in car parking on both Beaulieu Avenue and Romsey Avenue which would be inconvenient to users of the highway and harmful to highway safety.'*

- 1.9 The above reason for refusal related to car parking infers that as a result of parking restrictions being paced on Beaulieu Avenue and Romsey Avenue this would lead to an increase in car parking on both roads which would allegedly be inconvenient to users of the highway and harmful to highway safety. However, this is not supported by the Highway Authority. In addition at the time of the committee decision not supported by any highway evidence.
- 1.10 Subsequent to the Appeal and the issue of the Council's Statement of Case, the LPA instructed Mayer brown to undertake their own parking displacement study. This was forwarded to me on the 22nd June 2021. I will consider this further in Section 4 of my evidence.
- 1.11 FBC's Statement of Case claims that the above refusal relies upon Policies DSP40, CS5, CS17 and the National Planning Policy Framework (NPPF) paragraph 127 (f),

1.12 **Policy DSP40** allows for additional housing sites outside the defined settlement boundaries where the Council does not have a five year supply of deliverable housing land and where the scheme satisfies the five criteria set out in the policy.

1.13 The relevant criteria is (v) ***the proposal would not have any unacceptable environmental, amenity or traffic implications.***

1.14 **Policy CS5** (Transport Strategy and Infrastructure) states in relevant part:

'The Council will, where necessary work with the Local Highways Authority, to promote, permit, develop and/or safeguard high quality and sustainable integrated transport system for the Borough....

Development proposals which generate significant demand for travel and/or are of a high density, will be located in accessible areas that are or will be well served by good quality public transport, walking and cycling facilities.

The Council will permit development which:

- Contributes towards and/or provides necessary and appropriate transport infrastructure including reduce and manage measures and traffic management in a timely way;
- **Does not adversely affect the safety and operation of the strategic and local road network**, public transport operations or pedestrian cycle routes;
- Is designed and implemented to prioritise and encourage safe and reliable journey's by walking, cycling and public transport'

1.15 **Policy CS17** (High Quality Design) states in part:

'All development, buildings and spaces will be of a high quality design and be safe and easily accessed by all members of the community. Proposals will need to demonstrate adherence to the principles of urban design and sustainability to help create quality places.

In particular development will be designed to:

- Respond positively to and be respectful of the key characteristics of the area, including heritage assets, landscape, scale, form, spaciousness and use of external materials;
- Ensure that the public realm has pedestrian priority, is safe, secure, functional and accessible, and is constructed of quality materials and is well maintained;

- **Provide appropriate parking for intended uses** taking into account of the accessibility and context of a development and tackling climate change...'

1.16 FBC also rely upon the National Planning Policy Framework (NPPF) Section 12 Achieving well-designed places referring to paragraph 127 which states, 'Planning policies and decisions should ensure that developments:

- (f) creates places that are safe, inclusive and accessible and which promote health and well-being, **with a high standard of amenity for existing and future users** and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

1.17 In preparation for this Appeal a Statement of Agreed Highway Matters has been agreed between Stuart Michael Associates (SMA) and HCC to assist the Inspector, this document is included as Core Doc: CDAA.5. The Agreed Statement of Highway Matters is discussed in more detail in Section 3 of the evidence.

### **Scope and Format of the Evidence**

1.18 My evidence is presented hereafter in four sections. In Section 2.0 I set out what I regard as being the key transportation considerations in the context of the site.

1.19 In Section 3.0 I report upon the agreement has been reached with the local highway authority and the Agreed Statement on Highway Matters.

1.20 In Sections 4.0 I will review and respond upon which the Highway Reason for Refusal is based. I examine and comment upon the highway objection and demonstrate how, in my opinion, the currently proposed access arrangements and off-site works proposed will contrary to FBC's view, improve highway safety along Beaulieu Avenue and Romsey Avenue.

1.21 In Section 5.0, and for the purposes of presenting evidence, I provide a summary with the conclusions that I have drawn from this.



## 2.0 KEY TRANSPORTATION CONSIDERATIONS

### Site Access and Parking

- 2.1 Access into the site is proposed via the existing southern spur of Romsey Avenue along which access is currently gained by a gate. A series of proposals for works to the adopted highway between the site and the A27 junction with Beaulieu Avenue are proposed and are shown on **drawing 5611.025C**. These works have been agreed with the Highway Authority.
- 2.2 It is proposed to rebuild the existing access road from Romsey Avenue to current standards and to tie this into the Romsey Avenue carriageway. The existing junction with Romsey Avenue would be formalised with road markings and the installation of an uncontrolled crossing point.
- 2.3 The access road will be constructed to an adoptable 5.5m wide carriageway and a 2m wide footway on the eastern side with a parking bay provided on the western side to allow for up to 4 cars to be parked (**Drawing 5611.002D** refer).
- 2.4 Parking restrictions are proposed along Romsey Avenue and Beaulieu Avenue to keep the route from the A27 to the site free from carriageway parking.
- 2.5 The proposed parking restrictions enable access for larger vehicles' such as delivery vans, refuse vehicles and emergency service vehicles to better facilitate free flow movement between the appeal site and the A27.
- 2.6 The parking restrictions also ensure that visibility splays are not compromised by extending the restrictions at the existing junction of Beaulieu Avenue with Romsey Avenue as well as the appeal site access junction onto Romsey Avenue.

### Sustainable Travel

- 2.7 The site is located approximately 1.9km west of Portchester town centre. A number of key facilities are within proximity of the site as detailed in the Agreed Statement of Highway Matters (Core Doc: CDD.3).
- 2.8 SMA undertook a walking and cycling audit between the site and Portchester town centre and railway station. The audit highlighted potential measures to aid the delivery of safe walking and cycle routes from the site.
- 2.9 Improvements to footways with tactile paving at crossing points have been agreed with the HA and a financial contribution agreed.

### Highway Safety

- 2.10 HCC identified a safety improvement scheme for the Cornaway Roundabout to address an existing road safety problem for cyclists using the roundabout.
- 2.11 On the basis that the proposed development will generate additional vehicles (circa 50 peak hour movements) and cycles (circa 7 peak hour movements) using this roundabout, the appellant has agreed to provide a financial contribution to the delivery of the HCC cycle safety scheme.

### Vehicle trip distribution

- 2.12 The appeal site would generate the greatest number of movements in the morning peak hour (0800hrs-0900hrs) when it is estimated that there would be 147 two-way trips to and from the development site.
- 2.13 118 trips are expected to distribute to the A27 via Beaulieu Avenue with the remaining 29 trips using Hatherley Crescent to get to and from the A27.

- 2.14 HCC raised concern that the additional 29 trips on Hatherley Crescent would impact on the existing parking situation around Wicor Primary School.
- 2.15 It is recognised that Wicor Primary School suffers like the majority of schools on residential streets with parent parking during the morning 'drop off' and afternoon 'pick up', this is a common occurrence at all schools but parent parking is only for a short period throughout the day, usually for circa 15 minutes in the morning and 30 minutes in the afternoon. Furthermore, given that the school is only 960m away equivalent to a 12 minute walk, it is not unreasonable to expect some parents would walk their children to school from the appeal site. However, the appellant has agreed to provide a financial contribution for HCC to provide an updated School Travel Plan which will enable them to implement measures to maintain safety and encourage sustainable modes across the school, reducing the reliance on low occupancy car travel.

### **3.0 STATEMENT OF AGREED HIGHWAY MATTERS WITH HAMPSHIRE COUNTY COUNCIL AS HIGHWAY AUTHORITY**

- 3.1 A Statement of Agreed Highway Matters (Core Doc: CDD.3) has been entered into with the Highway Authority (HA). As set out in paragraph 1.4 of the Statement of Agreed Highway Matters the HA do not have any safety concerns with the scheme.
- 3.2 The parties are in agreement that the appeal site is acceptable in highway safety and sustainability terms, subject to the appellant entering into a S106 Agreement to secure a package of mitigation measures (Paragraph 9.1 of the Agreed Statement of Highway Matters refers).
- 3.2 The findings of the TA and Addendum TA is agreed along with the off-site mitigation works.
- 3.3 With regard to car parking at the request of HCC, SMA instructed an independent data collection company to undertake a parking survey along Romsey Avenue and Beaulieu Avenue to establish the extent of existing resident parking.
- 3.3 The parking survey demonstrated that if parking restrictions were added around the bellmouth of the site access / Romsey Avenue junction and around the Romsey Avenue / Beaulieu Avenue junction there was sufficient space in proximity to relocate existing resident parking.
- 3.4 HCC considered that the introduction of parking restrictions will not incentivise inappropriate or dangerous parking, as such would not result in worsening safety conditions nor a severe impact on the operation of the highway network.

#### **4.0 RESPONSE TO REASONS FOR REFUSAL**

- 4.1 It should be noted that the proposed development will not add any on-street parking to the surrounding roads, as all associated development parking will be accommodated within the site itself and parking provision will be in accordance with FBC latest car parking standards (Adopted in November 2009).

##### **Consultation Process**

- 4.2 Following submission of the planning application, Hampshire County Council (HCC), as Highway Authority (HA) raised on-street car parking as a potential concern.
- 4.3 A number of residents during the public consultation exercise also raised concern regarding the existing on-street parking on Beaulieu Avenue and also around the bellmouth of the junction of Beaulieu Avenue / Romsey Avenue. Concerns were related to what was perceived to be a number of parked cars that resulted in vehicles having to wait to allow oncoming cars to pass, due to the presence of the parked cars.
- 4.4 HCC recognised that current car parking between the site access and the junction of A27/Beaulieu Avenue takes place, restricting the free flow movement of vehicles along this route.
- 4.5 Given that it was accepted that the primary route from the development site to the A27 Fareham Road would be via Romsey Avenue and Beaulieu Avenue, the HA requested that SMA should undertake car parking surveys to establish the extent of car parking and for SMA to consider whether improvements could be made to the public highway which would free up the amount of cars parked on the public highway, thereby improving road safety.

##### **Beaulieu Avenue**

- 4.6 Beaulieu Avenue is approximately 125m in length connecting with the A27 to the north and Romsey Avenue to the south. There are double yellow line parking restrictions in

place around the junction with the A27 to the north. These double yellow lines extend some 40m along both sides of Beaulieu Avenue.

- 4.7 The remainder of Beaulieu Avenue has no parking restriction, although there are 3 driveway access points on the western side and 2 on the eastern side within this frontage that would not be available for on-street parking.
- 4.8 There is circa 70m of carriageway available for on-street parking which assuming a generous 6m (the length of a formal parking space), this equates to sufficient room for 11 vehicles, in reality it is likely that vehicles will range in length and drivers allow varying distances between parked cars. It may be possible to park 12 cars within this space.
- 4.9 Where parking takes place on Beaulieu Avenue the width of the running carriageway is reduced to 4.1m which is tight for a car to pass another travelling in the opposite direction, although as set out in Manual for Streets 1 (MfS1) Figure 7.1 (Core Doc: CDH.1) demonstrates that a 4.1m width is sufficient for a car to pass another in the opposing direction.

### **Parking Surveys**

- 4.10 Initially, SMA undertook a parking survey of Beaulieu Avenue after 10pm on a Friday evening and repeated the survey on a Sunday morning, as these were seen as times when the highest demand for resident parking is likely to occur (i.e. overnight and early on a weekend). The survey acknowledged to be a snap shot for those time periods and that, as with any traffic survey, there may be times when parking demand is higher or lower. However, during these survey periods a maximum of 10 cars were recorded on the eastern side of Beaulieu Avenue, no cars were recorded on the western side of the road or on the double yellow lines.
- 4.11 HCC didn't dispute the methodology or the results of the SMA survey but sought an independent survey based upon the Lambeth Style Parking Methodology (Core Doc.CDH.3)
- 4.12 The Lambeth Style Survey methodology requires a parking survey to cover an area where residents of a proposed development may want to park. This generally covers an

area of 200m (or a two minute walk) around the site. The 200m distance is seen as an acceptable walking distance to park away from the home.

- 4.13 The survey should be undertaken when the highest number of residents are at home; generally late at night during the week. The Lambeth Style survey suggests a snapshot survey should be undertaken on two separate weekday nights between the hours of 0030 and 0530.
- 4.14 The independent survey undertaken on Monday 26 and Tuesday 27 November 2018 revealed that a maximum of 12 cars were parked along Beaulieu Avenue. An extract of the survey results for Beaulieu Avenue and the section of Romsey Avenue and the site access road is included in Appendix 1.

#### ***Beaulieu Avenue Improvement***

- 4.15 SMA prepared **Drawing 5611.025C** which shows the introduction of a long parking bay along the eastern side of Beaulieu Avenue which has capacity to accommodate up to 12 cars. The parking bay would be provided by removing the grass strip between the footway and carriageway on the eastern side of Beaulieu Avenue where cars are currently parked, therefore there would be no displacement of parking on Beaulieu Avenue.
- 4.16 By providing this parking bay the running carriageway of Beaulieu Avenue is increased to 5.5m width, allowing a car and HGV to pass one another easily and safely.
- 4.17 HCC is satisfied that the introduction of a parking bay in this location will improve road safety and based upon the survey results there is no evidence to suggest that any vehicles on Beaulieu Avenue would be displaced to other local roads.
- 4.18 Despite there being no current car parking observed on the western side of Beaulieu Avenue, HCC requested that as the carriageway was effectively being widened there may be a desire for existing Beaulieu Avenue residents to park on the western side of the road. To prevent this the HA has requested and the Appellant has agreed to provide a financial contribution of £6,000 for HCC to introduce a Traffic Regulation Order (TRO) for parking restrictions on the western side of the carriageway.

- 4.19 Turning to the FBC Reason for Refusal related to car parking, all existing resident cars will still be able to park on Beaulieu Avenue, and given that all development car parking will be accommodated on-site there is no reason to suggest there will be an increase in car parking on Beaulieu Avenue as a result of the Appellant's site, as the Reason for Refusal states.
- 4.20 The proposed parking bay for Beaulieu Avenue will therefore not adversely affect the safety and operation of the local road network, it therefore complies with Policy C5 and no resident parking is compromised, thereby Policy C17 is compliant.
- 4.21 The proposal for Beaulieu Avenue will improve the parking situation along the road, at the same time allowing the free movement of traffic along it, as a consequence the proposal is compliant with Policy DSPN40 and the NPPF.

### **Romsey Avenue**

- 4.22 The section of concern for the HA was the short section of road between the site access and the junction of Romsey Avenue /Beaulieu Avenue where car parking was observed.
- 4.23 Within the area of concern to the HA there are 12 properties (No. 16-38) on the south side of Romsey Avenue, each one which has a driveway suitable for at least one car to be parked with the majority of the properties having space for two cars to be parked on driveways away from the public highway.
- 4.24 There are 5 properties on the northern side of Romsey Avenue which again have driveway frontage for the parking of at least one car; three of the five properties have space to accommodate two cars on their driveway.
- 4.25 It is pertinent to note that when the parking surveys were undertaken in November 2018 property No's 21 and 23 Romsey Avenue (opposite site access) did not have off-road parking available to them. However, since that date, both properties have introduced parking within the curtilage, property No.21 can now accommodate 2 cars and property No.23 can accommodate a 1 car on their frontage. A screenshot of google 'street view' confirms this (**Drawing 6729.005** refers). It is therefore very likely that these 3 cars were parking either on Romsey Avenue or along the site access road in proximity to their



properties and were recorded in the parking assessment and consideration was given to their potential displacement.

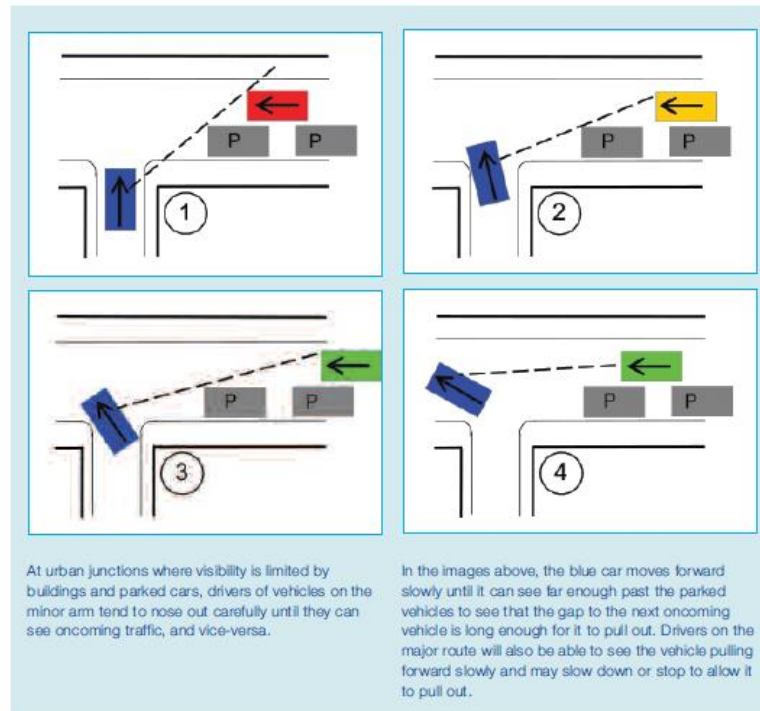
- 4.26 **Drawing 6729.001** demonstrates that where the HA intend to introduce parking restrictions in front of the properties, there is sufficient off-road parking available not to inconvenience existing residents.
- 4.27 The HA requested that SMA review the impact of introducing parking restrictions around the site access with Romsey Avenue and around the junction of Romsey Avenue with Beaulieu Avenue. The purpose of this is to ease free flow of traffic movement between the site and the A27.
- 4.28 A review of the latest 5 year accident statistics confirm there has been no recorded injury accidents on Romsey Avenue or Beaulieu Avenue, therefore there is no suggestion the parking proposals are safety driven as clearly there is no road safety problem on these two residential roads.
- 4.29 The HA also requested that the parking analysis should be extended to include cars parked within the visibility splays at the two junctions. It should however be recognised, that cars should not be parking in close proximity to junctions. The Highway Code Rule 243 states, '**DO NOT stop or park opposite or within 10m of a junction, except in an authorised parking space**'. There is therefore no requirement within the design standards or Highway Code to provide double yellow line parking restrictions for the full visibility splay, instead only 10m is required to enforce the provision set out in the Highway Code.

4.30 Furthermore, the advice in Manual for Streets 2 (MfS2) paragraph 10.7.1 states that obstacles such as parked cars are acceptable in visibility splays where speeds are low.

### 10.7\_ Obstacles To Visibility

10.7.1 Parking in visibility splays in built-up areas is quite common, yet it does not appear to create significant problems in practice. Ideally, defined parking bays should be provided outside the visibility splay. However, in some circumstances, where speeds are low, some encroachment may be acceptable. (See Example below.)

10.7.2 The impact of other obstacles, such as street trees and street lighting columns, should be assessed in terms of their impact on the overall envelope of visibility. In general, occasional obstacles to visibility that are not large enough to fully obscure a whole vehicle or a pedestrian, including a child or wheelchair user, will not have a significant impact on road safety.



Manual for Streets 2

4.31 The speed survey indicates that the 85<sup>th</sup> percentile speed on Romsey Avenue is circa 26mph. This survey was undertaken to the east of the site access road and before the Beaulieu avenue junction. Vehicles turning into and out of the site access and those turning into or out of Beaulieu Avenue junction will therefore likely be travelling at an even lower speed as they approach the junction and complete the turning manoeuvre. I consider this to be a very low speed situation where, as set out in MfS2, some parking within visibility splays are acceptable.

- 4.32 Notwithstanding the above, SMA instructed an independent survey company to carry out a parking survey using the same Lambeth style methodology as undertaken for parking on Beaulieu Avenue . This survey identified a maximum of 13 cars that were either parked around the two bellmouths of Romsey Avenue (illegally parked) or within the visibility splays (**Drawing 5611.022A** refers).
- 4.33 The parking analysis (**Drawing 5611.023D** refers) confirmed that the furthest distance a displaced car is potentially moved is 45.1m, whilst the average distance is 22m. This distance is well within the 200m distance that the Lambeth style survey suggests is a reasonable distances to park and walk to the residents home, it should be noted that cars should not be parking within the bellmouth and this displacement of observed parking is as a result of enforcing parking restriction requirement set out in the Highway Code, not as a result of the proposed development.
- 4.34 The assessment confirmed there is adequate on-street parking available on Romsey Avenue to accommodate the existing parking demand after the introduction of the parking restrictions around the bellmouth. This assessment was agreed with the HA.
- 4.35 Furthermore, the Appellant has agreed with the HA to provide a parking bay on Romsey Avenue for two cars to park.

### **Site Access**

- 4.36 The parking survey also included the site access between the site boundary and Romsey Road and although no direct frontage development is on this section of road, there was evidence of parked vehicles along it.
- 4.37 The applicant has therefore agreed to provide a parking bay to accommodate up to 4 cars on this road (**Drawing 5611.023D** refer), this will then provide a relatively free flowing carriageway width of 5.5m out of the site access to Romsey Avenue.
- 4.38 The addition of parking restrictions around the two junctions and rationalising of the on-street parking provision along Romsey Avenue will improve highway safety and improve the operation of the local road network, the proposals are therefore compliant with Policy

CS5. Furthermore, the addition of parking bays on both the access road and Romsey Avenue will improve the amenity and traffic implications on both these roads as well as providing appropriate parking for existing residents. Therefore, the proposals are also compliant with Policy CS17 and DSP40.

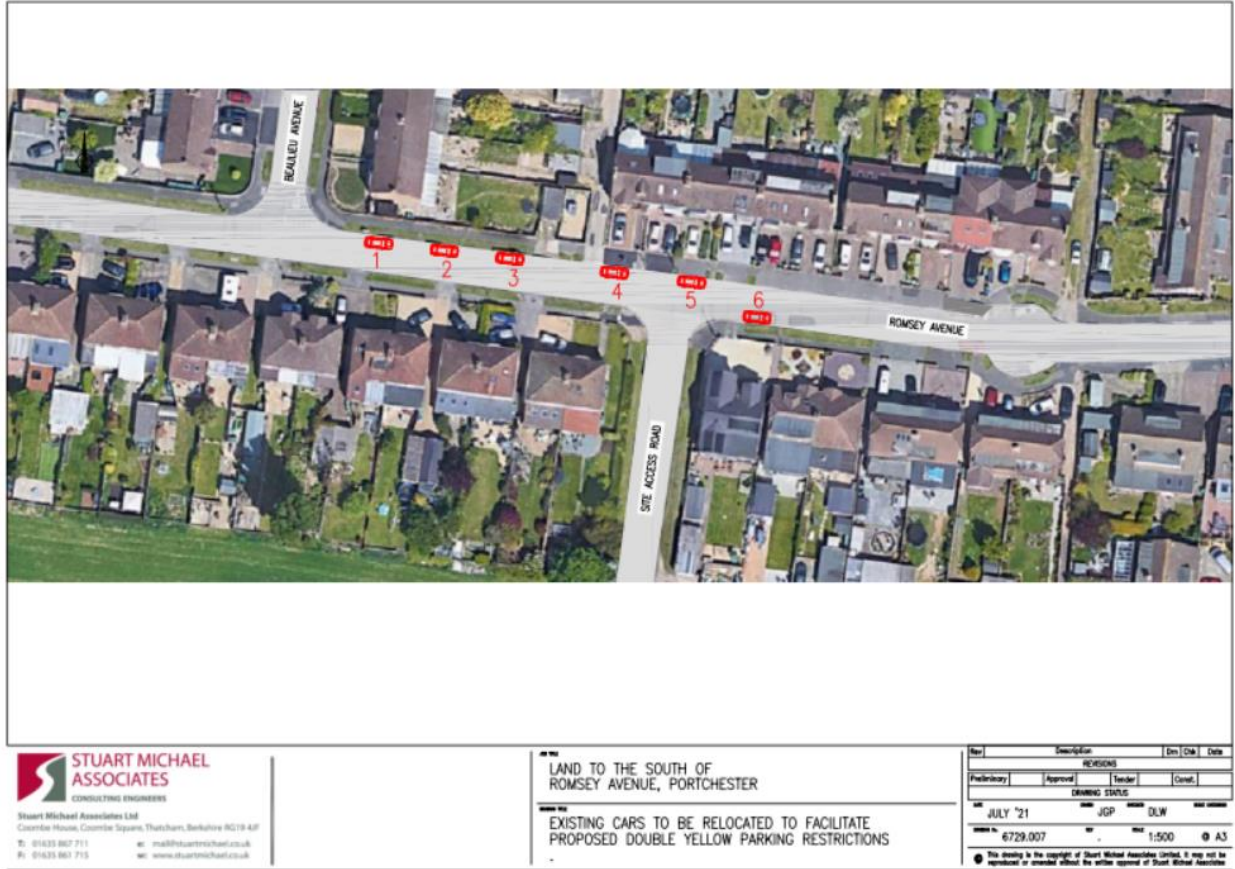
### **Mayer Brown Parking displacement Study**

- 4.39 A Parking Displacement Study prepared by Alec Philpott of Mayer Brown Consultants on behalf of Fareham Borough Council was forwarded to SMA on 22 June 2021.
- 4.40 The Mayer Brown parking displacement study concluded that although the parking displacement study undertaken by SMA was a possible scenario whereby it was assumed that all cars parked in the closest space available, in reality it was just one option and any cars could arrive in any order and thus park in the closest space to their house that is available at that specific time.
- 4.41 Furthermore, the study concluded that photographs from the public and google imagery showed it was not uncommon to have between 5 and 9 cars parked on the access road and therefore potentially an additional 5 cars would be displaced. As a consequence, the displacement distances much exceeded the maximum distance of 45.1m recorded by SMA.
- 4.42 It is noted that Mayer Brown accept that the displacement analysis undertaken by SMA and accepted by the HA is entirely possible scenario however they consider a random sequence generator would present a more balanced picture of the displacement.

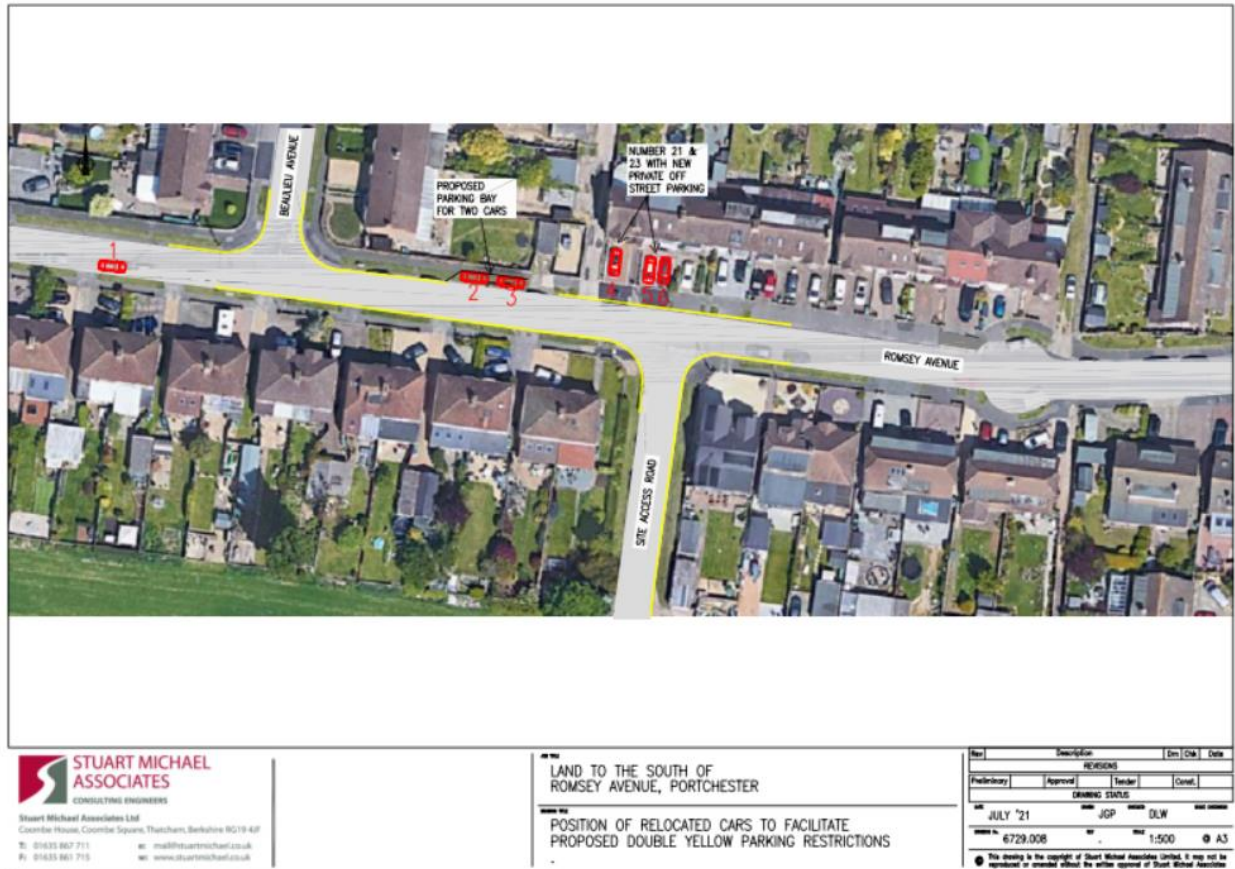
### **SMA Response to Mayer Brown Displacement Study**

- 4.43 It is important to note that as a result of the introduction of parking restrictions along Romsey Avenue only 6 cars are directly impacted by the introduction of the double yellow lines (**Drawing 6729.007** below refer). The other cars that SMA displaced in their analysis are those that may need to move as a result of the 6 displacement cars potentially taking their current parking space. This analysis was considered by the HA to be robust and was therefore acceptable to them.

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4.44 Furthermore, and as set out earlier in this evidence (paragraph 4.25) property Numbers 21 and 23 now have off-road parking which they didn't have when the parking survey was undertaken in November 2018. It is therefore highly likely and not unreasonable to assume that 3 of the 6 cars identified for displacement now have the opportunity to park on their private driveway reducing the number of displaced cars to only three on Romsey Avenue.



- 4.45 With regard to the two photographs (Figure 3 of Mayer Brown Report) I have visited the site on many occasions and I have never seen the level of parking as shown on these two photographs. It may be coincidence but I note one of the photographs was taken just before the planning application went to the Planning Committee in September 2020.
- 4.46 The survey undertaken in November 2018 confirmed 5 cars parked on the access road and this is consistent with the 2016 and 2020 google imagery (Figure 4 of Mayer Brown report).
- 4.47 With regard to the 2009 google imagery in Figure 4 of the Mayer Brown report which show 7 cars parked on the access road, this was at a time when five properties (numbers 14, 22, 24 21 and 23) did not have any off-road parking. As a consequence, it is highly likely that residents from these properties were using the access road to park on, hence why 7 cars are shown parked on the access road.

- 4.48 Since being in receipt of the Mayer Brown report I have visited the site on 5 separate days and taken photographs of cars parked on the access road to check current parking levels. The photographs shown in **Figure 1** confirm that the 2016 and 2020 google imagery is more realistic with 3 of the days recording 4 cars plus a trailer and on the other two days 5 cars plus a trailer.
- 4.49 Given that Table 3 and 4 in the Mayer Brown report assume up to 16 and 18 cars being displaced respectively I cannot accept these two scenarios.
- 4.50 It is accepted that when in 2018 the Lambeth Survey was undertaken SMA did not consider the displacement of any cars on the access road which has no frontage development along it, this was because at that time SMA was under the impression that the HA would support a limited time restriction on this access road, however the HA later confirmed that the access road would also require double yellow lines throughout.
- 4.51 Based upon the above, SMA has used the same methodology (random sequence generator approach) that Mayer Brown used to provide an order of vehicle arrival (see SMA displacement study Workings – **Appendix 2**). As per the Mayer Brown study SMA has allowed for 5 sequences. The table below also makes allowance for up to two cars being displaced from the access road.
- 4.52 Based upon the order of arrival, vehicles have been positioned into the nearest available parking space and the distance each vehicle is moved is measured and shown in the Table below



Car	Round 1	Round 2	Round 3	Round 4	Round 5
1	9.0	0.0	0.0	0.0	0.0
2	0.0	0.0	19.3	0.0	0.0
3	42.5	42.5	24.0	37.8	37.8
4	44.5	0.0	0.0	0.0	51.7
5	6.0	57.2	0.0	0.0	6.0
6	0.0	0.0	0.0	0.0	0.0
7	19.6	32.9	51.5	62.0	19.6
8	0.0	0.0	0.0	0.0	0.0
9	33.5	15.0	0.0	0.0	33.5
10	0.0	0.0	0.0	0.0	0.0
11	0.0	0.0	0.0	0.0	0.0
12	0.0	25.1	19.8	0.0	0.0
13	0.0	0.0	0.0	6.0	0.0
14	0.0	0.0	0.0	0.0	0.0
15	39.5	39.5	65.5	65.5	39.5
Average*	16	18	15	14	16

\*average excludes cars 6,8 &14 who can now park off road on new drive area

4.53 The above table confirms that the displacement distance range from 0m to 65.5m, with 5 of the 15 cars resulting in zero displacement. The additional displacement of circa 20m is considered to be inconsequential and still well below the 200m threshold that the Lambeth Style Parking Methodology advises.

4.54 Notwithstanding the above, it is also important to note that along the Section of Romsey Avenue impacted by the yellow lines, all the dwellings have off-road parking in the form of driveways to the front of their properties capable of accommodating at least one car with the majority of dwellings providing off-road parking for two cars (**Drawing 6729.001** refers). Furthermore, these properties also benefit with garage access to the rear of the properties.



## Summary

4.55 Taking the elements of the Reason for Refusal C in turn:

(i) the proposal would result in extra parking restrictions on both Beaulieu Avenue and Romsey Avenue

4.56 The proposed parking restrictions on Beaulieu Avenue and Romsey Avenue will improve road safety for all road users, in particular for pedestrian and cyclist users. This has been agreed with the HA and set out in the Agreed Statement of Highway Matters.

(ii) on-street parking being displaced from the access road into the development site.

4.57 There is no displacement of car parking on Beaulieu Avenue, it is accepted there will be some displacement of parking along Romsey Avenue and the access road but as the parking survey has confirmed the distance of displacement is minimal.

(iii) the development will lead to an increase in parking on Romsey Avenue and Beaulieu Avenue

4.58 There will be no increase in parking on Romsey Avenue or Beaulieu Avenue as a result of development traffic from the Appeal site. The appeal site will provide parking in accordance with Fareham Borough Council's Parking Standards within the development site and can be secured by Condition.

(iv) displacement of parking would be inconvenient to users of the highway and harmful to highway safety.

4.59 As there will be no increase in on-street parking from the appeal site the Reason for Refusal is incorrect to imply that there will be an increase in car parking on both roads which would be inconvenient to users of the highway and harmful to highway safety. This has been agreed with the HA and set out in the Statement of Agreed Transport Matters.

## Conclusion

4.60 The Local Planning officers report to the Planning Committee dated 16 September 2020 did not raise any objection related to amenity or car parking.

- 4.61 The HA was also satisfied that the scheme was acceptable in locational and highway safety terms. It was only after Members requested a highway objection that the car parking objection was added to the Decision Notice on 21 September 2020
- 4.62 The parking proposals and parking restrictions have the full support of the HA. The HA recognise that this is an improvement on the existing situation and will enhance road safety, thereby compliant with Policies CS5, CS17 and DSP40.
- 4.63 It must be recognised that a public highway is to enable the relative free movement of vehicles along it, its purpose is not to provide car parking for residents.
- 4.64 The Appellant's site will need to comply with FBC parking standards so there is no reason to suggest as the Reason for Refusal states that the development will lead to an increase in parking on Romsey Avenue and Beaulieu Avenue.

## 5.0 SUMMARY OF EVIDENCE AND CONCLUSIONS

- 5.1 The appeal site is well located to a good range of facilities in Fareham and Portchester, a large proportion of which are within 2km of the site and therefore within a reasonable walking or cycling distance.
- 5.2 The Local Planning officers report to the Planning Committee dated 16 September 2020 did not raise any objection related to amenity or car parking.
- 5.3 The HA were also satisfied that the scheme was acceptable in locational and highway safety terms. It was only after Members pushed for a highway objection that the car parking objection was added to the Decision Notice on 21 September 2020
- 5.4 The parking proposals and parking restrictions have the full support of the HA. The HA recognise that this is an improvement on the existing situation and will enhance road safety, thereby compliant with Policies CS5, CS17 and DSP40
- 5.6 A Statement of Agreed Highway Matters (SofAHM) with HCC as Highway Authority confirms that there are no highway objections to the planning application.
- 5.7 There is no displacement of any car parking on Beaulieu Avenue, all existing resident cars will be moved to the dedicated parking bay
- 5.8 The Mayer Brown parking displacement study has overestimated the parking displacement by not taking into account the additional off-road driveways that have been added to properties along Romsey Avenue since the survey was undertaken in 2018 and by over estimating the cars that would be displaced from the access road based upon their receipt of two photographs sent in from local residents.
- 5.9 HCC Highways confirm that the car parking proposals will not incentivise inappropriate or dangerous parking and as such will not result in a severe impact on the operation of the highway network.

- 5.10 I have undertaken a review of the policies for which the parking reason for refusal was based upon and I consider that the parking proposals (parking bays and parking restrictions) will improve road safety and the operation of the local road network. Furthermore, the proposals will not have a detrimental impact on the local amenity therefore comply with Policies CS5, CS17, DSP40 and the NPPF
- 5.11 I have reviewed the parking displacement study undertaken by Mayer Brown on behalf of Fareham Borough Council and consider much of their analysis (in particular Tables 3 & 4) and the photographs in the report not to be representative of the current parking conditions.

### **Conclusion**

- 5.12 Based on the evidence presented, all highways related issues raised within the reasons for refusal have been adequately addressed. A Statement of Agreed Highway Matters sets out that the highway authority, HCC, agrees that the parking proposals will not incentivise inappropriate or dangerous parking and as such will not result in a severe impact on the operation of the highway network. Therefore, there are no valid reasons for refusal on car parking.