



**LAND TO THE SOUTH OF ROMSEY  
AVENUE  
INSPECTORATE REFERENCE  
APP/A1720/W/21/3271412  
LPA REFERENCE P/18/1073/FP**

**SUMMARY OF PROOF OF EVIDENCE OF  
ALEC PHILPOTT IN RESPECT OF  
HIGHWAYS AND TRANSPORTATION  
MATTERS**

**JULY 2021**



**the journey is the reward**

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ALEC PHILPOTT IN RESPECT OF  
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**JULY 2021**

**Project Code: FBCRomseyAvenue.1**

**Prepared by: Alec Philpott**

**Issue Date: 9<sup>th</sup> July 2021**

**Status: FINAL**

**Land to the South of Romsey Avenue**  
**Inspectorate Reference APP/A1720/W/21/3271412**  
**LPA Reference P/18/1073/FP**  
**Summary of Proof of Evidence of Alec Philpott in Respect of Highways and**  
**Transportation Matters**

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# 1 Summary of Proof

## Qualifications and Experience

- 1.1 My name is Alec Philpott. My qualifications and experience are contained within section 1 of my main proof.

## Introduction and Scope of Evidence

- 1.2 My evidence, which is given on behalf of Fareham Borough Council (FBC), considers the transport related matters which are the subject of this Planning Appeal.
- 1.3 The proposals comprise outline planning for a residential development of 225 dwellings, bird conservation area and public open space with all matters reserved except for access.
- 1.4 The site is presently used for growing crops and lies outside of the defined settlement boundary, although adjacent to an urban area which is largely occupied by residential properties and associated estate roads, which are subject to high on-street parking demand.
- 1.5 To the north of the appeal site, Romsey Avenue and Beaulieu Avenue would form the primary means of accessing the development by car from the A27.
- 1.6 Hampshire County Council (HCC) raised no objection to the application on transportation grounds, but stated in a consultation response dated 19<sup>th</sup> December 2019 that FBC as planning authority should satisfy themselves that walking distances to alternative parking spaces are acceptable on amenity grounds.
- 1.7 FBC refused planning permission and stated in reason for refusal (c) that 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.
- 1.8 My main proof of evidence considers the relevant policies and components of the reason for refusal, in context of the following considerations:
- The appropriateness of the Appellant's Transport Consultant's review of potential parking displacement as a result of the development proposals;
  - The implications on degree of parking displacement of undertaking a more representative assessment;

- What constitutes an impact on convenience/amenity in terms of displacement; and
- The implications of the proposed Traffic Regulation Orders (TROs) and general parking demand on highway safety and free flow of traffic.

### Evidence

1.9 My evidence draws on a Parking Displacement Study produced by my team at Mayer Brown (Appendix AP2 to my main proof).

1.10 My evidence identifies the following on amenity/convenience issues:

- The Appellant's transport consultant considered a single vehicle arrival profile scenario and failed to consider the random nature in which vehicles are likely to occur. Their approach lacked robustness and significantly under-estimated the potential maximum distance that parking may be displaced;
- The Appellant's approach did not take into account additional parking pressure caused by relocating vehicles from the site access road that would not be accommodated by the proposed 4-vehicle layby;
- When the Appellant's approach is replicated with amendments to allow for: (i) random arrival profiles (my Scenario 1); and (ii) random arrival profiles and additional parking pressure from relocating vehicles from the site access road (my Scenarios 2 and 3), potential displacement distances could be significantly greater than those presented by the Appellant (the maximum in my scenarios being 173.9m, nearly four times greater than reported by the appellant during the application process);
- The Appellant's transport consultant had no regard for existing displacement distances residents may presently be encountering;
- With regard to the relationship of parking location and a person's home, application of the 200m threshold under the Lambeth Parking survey methodology in this context is not appropriate;
- Existing parking does not cause any significant access issue and any displacement of car parking is a direct result of the development proposals;

- A resident or road user's amenity can be a subjective matter with some elements being less tangible than others. However, I consider it likely that residents and existing road users could be significantly inconvenienced by the proposed development. Indeed, the volume of comments raised by residents relating to parking is a clear indication that they feel their amenity is likely to be impacted; and
- I conclude that the development is not in compliance with Policies CS5 (part 3), CS17 and DSP40(v) or the NPPF paragraphs 108(b) and (c) and 127(f). Although I do not consider the residual impacts on the road network to be "severe" for the purposes of NPPF paragraph 109, I consider them to be significant.

1.11 My evidence identifies the following on safety issues:

- The combination of parking stress, sheer volumes of traffic and typical day to day activities of local residents are likely to give rise to inevitable conflict and resulting highway safety issues; and
- Consequently, I conclude that the that the development is not in compliance with Policies CS5 (part 3), CS17 and DSP40(v) as well as NPPF paragraphs 108(b) and (c), 109 and 127(f).

### **Conclusion**

1.12 In my opinion, the development will result in an unacceptable impact on highway safety and will have a significant impact on existing residents in terms of displacement of parking.

1.13 Based on the above, I believe that FBC were justified in refusing the application on highways grounds (RfR (c)).

