

Rawlings, Sam

Subject: FW: Appeal by Foreman Homes re Land to the south of Romsey Avenue, Portchester (APP/A1720/W21/3271412) - Proof of Evidence to be presented by Robert Tutton

Subject: Appeal by Foreman Homes re Land to the south of Romsey Avenue, Portchester (APP/A1720/W21/3271412) - Proof of Evidence to be presented by Robert Tutton

Dear Tim Salter

I am pleased to provide this Proof of the Evidence that I would present to the forthcoming virtual inquiry, in support of the decision by Fareham Borough Council to refuse planning application P/18/1073/FP. My evidence primarily relates to Reasons for Refusal (b) and (f.)

I hold an Honours Degree in Town and Country Planning and was elected a corporate Member of the Royal Town Planning Institute in 1976. I have worked in the town and country planning field for 56 years - 9 with Portsmouth City Council and 15 with Fareham Borough Council. I have been a Town Planning Consultant in private practice since July 1989 and a Director of Robert Tutton Town Planning Consultants Limited since January 2008. I work from my home at 23 Romsey Avenue, where I have lived since 1979 - directly opposite the short cul-de-sac that is proposed to serve 225 dwellings.

Portsmouth Harbour is a Special Protection Area (SPA) and a Ramsar site, so it is recognised as being of international importance under the Ramsar Convention on Wetlands that was established by UNESCO in 1971. Situated just 180 metres to the northeast of the designated Ramsar area, the appeal site is a 'Primary Support Area' for Brent geese and waders. The Senior Ecologist at Hampshire County Council stated that "*Our survey work in 2013 and 2014 shows that approx. 300 Brent geese were recorded, mainly feeding in the centre of the site.*" My own observations have confirmed that the geese primarily feed on the central and eastern parts of the field, so the erection of houses on those parts would cause maximum disturbance of their grounds. In my submission, Fareham Borough Council was right to cite Reason for Refusal (b).

Section 170 of the NPPF calls for planning policies and decisions to "*...contribute to and enhance the natural and local environment by...including the economic and other benefits of the best and most versatile agricultural land*" and Note 53 on page 49 asserts that "*...areas of poorer quality should be preferred to those of a higher quality.*"

Policy CS16 of the Fareham Core Strategy reiterated that approach - "*New development will be expected to safeguard the use of natural resources by preventing the loss of the best and most versatile agricultural land (Grades 1, 2 or 3A of the Natural England Agricultural Land Classification System).*"

Paragraph 4.4 of the report re "Agricultural Land Considerations" prepared by Kernon Countryside Consultants Limited stated that "*The study area has been cropped with spring barley, winter wheat, winter oats and oilseed rape for the past few years*"; its Table 3 showed that 5.9 hectares (72%) of the development site is ALC Grade 1 (Excellent) and 2.3 hectares (28%) is Grade 2 (Very Good); and paragraph 3.12 concluded that "*The survey in 1997 shows the development site comprises 8.2 ha of BMV agricultural land.*" In my submission, Fareham Borough Council was right to cite Reason for Refusal (f).

It is apparent that the appellant company has called for the positive ecological and agricultural qualities of the appeal site to be put aside because of a shortfall in the Borough-wide supply of land for housing development, which was admitted in February 2021 as being 4.2 years (84%). The level of shortfall is similar to that which was identified in the Cornwall Road appeal in Harrogate in 2017 (4.06 years) - the reference number of that appeal was APP/E2734/W/16/3160792. The agricultural quality of the 'Harrogate' land was markedly lower than that of the land south of Romsey Avenue (being "*...primarily Grade 3b with a limited area of Grade 3a along its northwest margin*") but Inspector Manning found that, as Harrogate Borough Council was "*...pro-actively addressing the situation through grants of planning permission and by active forward allocation of sites through the...protracted local planning process...the permanent and irreversible loss of the appeal site to such development is a seriously harmful prospect*"

that weighs very heavily against the additional housing land supply proposed in this case, notwithstanding its social and economic benefits...It is moreover no part of Framework policy that housing need, notwithstanding the imperative to successfully address it, must always override other considerations."

Attention will be drawn at the inquiry to Fareham Borough Council's progression of the "Fareham Local Plan 2037." The time-line approved by the Scrutiny Panel on 25th May recorded the intention to submit the plan to the Secretary of State in the Autumn, with a view to adoption in the Autumn/Winter of 2022. The Revised Publication Local Plan allocates 15 new sites for housing, including a broad location for 620 dwellings within Fareham Town Centre. The Local Plan has evidently reached an advanced stage and its public examination would enable the qualities of the 'Romsey Avenue' appeal site to be explicitly compared with 'areas of poorer quality' elsewhere in Fareham Borough, to ensure that the intentions of the NPPF are realised. In my submission, the long-term future of this land should be determined in that Borough-wide context. Thank you.

I would welcome the opportunity to participate in the inquiry by telephone and would welcome clarification of the arrangements that would need to be put in place. Thank you

Kind regards,

Robert Tutton
Director

Robert Tutton Town Planning Consultants Ltd
23 Romsey Avenue, Fareham, Hampshire, PO16 9TR