

Royal Clarence Marina Residents Association

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Dear Mr. Bridge

17/00290/FULL | CAR PARKING STRATEGY (AMENDMENT TO CAR PARKING STRATEGIES APPROVED 29.02.08 AND 16.10.15) (CONSERVATION AREA) (as amended by documents received 18.11.19) | Royal Clarence Marina Weevil Lane Gosport Hampshire

The Residents Association at Royal Clarence Yard welcomes a number of the revisions to the latest plans which appear to have taken account of some of the objections we had previously put forward. However, unfortunately, there are still some concerns which have either only been partly addressed, not thought through adequately or not addressed at all.

It is regrettable that the applicant continues to refuse to offer any form of meaningful public consultation with residents and other stakeholders at RCY on their latest proposals, opting instead for a not very productive meeting in mid-October with a few leaseholder residents from the Residents Association. At that meeting most of the topics were aired but there was very little in the way of practical resolution or proposals forthcoming. It was only when the latest detailed plans were submitted to GBC that we finally got some answers to the questions raised following strong concerns of residents. If they had consulted properly in the first place and had continued with a constructive dialogue with residents and other stakeholders, the remaining unworkable elements of this latest plan would probably have been spotted earlier and alternative suggestions considered.

For that reason, the Residents association regrets that it still has to lodge **objections** to the proposed Car Parking strategy for the reasons given below and in the detailed report attached to this letter. Grounds being that the proposals still fail to meet most of the key objectives of Local Policy (LP23: Layout of Sites and Parking) and several of the standards set out in both the Parking and Design Supplementary Planning Documents.

We note that the applicant continues to argue that current policies cannot be retrospectively applied. However, we would contend that:

1. It seems from current Planning guidance that there is an onus on the LPA to apply common sense when determining what weight should be given to either previous approvals and/or current policies when determining an application (as these are all material considerations)
2. If the LPA were to accept the assertion that this application cannot be measured retrospectively against LP23 and other more recent policies, then it follows that the fall-back position would be to consider it against the policies which were in place at the time of the original decision (which in this case would be the now superseded Policies R/T3 "Internal Layout of sites" and R/T11 "Access and Parking" policies) [add ref]. Both of which included clear requirements which mirror the current core elements of LP23. So, it would seem disingenuous for the applicant to assert that it does not have to abide by *any* of these requirements.

In particular, the applicant has failed to demonstrate that they have met the requirements set out in LP23 for:

- *Access around the site should follow a logical hierarchy of routes. It should be easy to find your way around the site and should be attractive. The layout design should be convenient, safe and functional for all forms of traffic expected to use the site...*¹ They have now provided a nominal "indicative" wayfinding proposal which is welcome. Unfortunately this appears to have been cobbled together in a hurry and submitted without thought for the core requirements of a proper wayfinding strategy and with little or no acknowledgement need for a coherent design, colours and style which would be appropriate for this important Conservation Area. Back in the early days of this development, the applicant took a great deal of care about all aspects of the design of the layout, wayfinding and signage. Unfortunately, over the years, more and more badly-designed signage (a lot of it to do with parking restrictions) has been added so that there is now an ugly hodge-podge of confusing and mis-matched signage littered across the site. The applicant does appear to have finally acknowledged that there is an issue, but the proposal put forward is not fit for purpose and fails to meet the requirements of LP23, LP10 and LP12. While the applicant now says, informally, that they are willing to listen to our ideas on this subject, we strongly recommend that the LPA does not approve this application until such time that a more acceptable wayfinding, firm proposal which fits the requirements of the Conservation Area is provided.
- *Sufficient visibility and lighting is provided for the safe and convenient use of the roads, cycle tracks, paths and parking places.* There are many ill-lit areas which are unwelcoming to visitors and some which become positively dangerous on a dark, wet night. Especially at pedestrian crossing points and down to the Waterfront. We welcome the latest "indicative" lighting proposal submitted with this application but strongly suggest that the applicant should make a firm proposal, together with a binding implementation deadline before this CPMP is approved.
- *Traffic management measures are included to control the speed of traffic generated by the development, to ensure that the safety and convenience of all highway users including cyclists and pedestrians is maintained or enhanced.* There are still no speed

¹ GBC Design SPD 2014: Access Parking & Services p43

limits across the site and insufficient traffic calming measures, particularly at internal junctions.

- *Access and parking for people with disabilities is provided in accordance with the relevant current standards* While we are pleased to see that the applicant has improved the size and layout of disabled parking bays and indicated their intention to provide dropped kerb access from those parking spaces to the pavement, some problems remain with some of the proposed bays and their locations (see detailed notes) This is not just a question of providing disabled parking spaces. They also have failed to demonstrate that they have thought through how access is to be provided for those with a range of disabilities and met those needs in line with current guidelines.
- *To ensure the proposed numbers of parking spaces and distribution are adequate to protect the amenity of existing residents and the needs of businesses and services.* We are still concerned about the proposed reduction by 30% of Visitor spaces in North Meadow and the lack of short stay visitor cycle parking. (see detailed notes).
- No details have been provided for the hard landscaping, surface materials, lighting for the footprints for either of the previously proposed Phases NM4/5 and NM3 which are now not to be built but where the footprint of those blocks is now to be included in the permanent north Meadow/Zone 2 car park. Both ends of the NM4/4 footprint regularly flood in wet weather. Full details of the construction of these new car-park areas should be provided, in line with previous conditions for these Phases and also to meet the requirements of LP45 (point 5) (Sustainable Drainage Systems).

There is still no Design and Access Statement submitted with these latest revision, so our previous comment stands: *There is no Design and Access Statement submitted which might have been expected to cover most of the missing elements listed above and the Planning Statement submitted in 2017 is both woefully deficient on the requirements of LP23 and other policies but has also not been updated to reflect the newly proposed changes which are the subject of this consultation.*

We strongly recommend that Berkeley Homes considers the points we have raised in this letter and in the detailed report with follows. We believe that if they could demonstrate a willingness to consult and collaborate with residents and other stakeholders in a meaningful and timely manner, most of the remaining objections could be resolved without much fuss, expense or difficulty.

However, that would require Berkeley Homes to engage properly with residents, which, hitherto, they have steadfastly refused to do.

We remain ready and willing to help and advise. After all, we live here and see the everyday needs of people trying to figure out how and where to park at RCY. It is in everyone's interests to get this right. Not just "almost" right or "a bit better" but "as good as it can possibly be", so that RCY can finally deliver its potential as a welcoming visitor attraction, a source of jobs and economic growth, a pleasant and good place to live and one of the jewels in Gosport's crown.

If they are not willing to reconsider and consult properly, we urge the Local Planning Authority to use its common sense and continue to seek further improvements before making a determination of this application.

Yours sincerely

David Whitehead
Chairman

Appendices follow:

Appendix 1: Updated response to latest consultation following revisions received by GBC 18 Nov 2019

Appendix 2: Wayfinding: A Discussion Document and Proposal from RCMRA

Appendix 3: Level Access Routes Across the Site (and problem/access crossing points)