

From: [Wemyss, Steve \(Cllr\)](#)
To: [Aquind Interconnector](#)
Cc: [REDACTED]
Subject: Application for Interconnector - Portsmouth
Date: 21 December 2020 15:52:23
Attachments: [PFC Farlington 1994.pdf](#)

Dear Hefin

Please find below an abridged version of the speech I had submitted to the open floor meeting on the evening of 17 December in respect of the above (foreshortened to meet the 5 minute limit). At that meeting one of the inspectors asked me to submit details of the Secretary of State's refusal of a previous application in 1994 for a development at Farlington playing fields by Portsmouth Football Club. I have appended the relevant sections at the end of my speech below but have also attached the decision letter for completeness.

My name is Steve Wemyss. I have been a Conservative Portsmouth City Councillor for over 30 years and have lived in Portsmouth since childhood. I mention party affiliation only to make you aware that the views I express are consistent with the objection raised across parties in this city. I also object both on my own behalf and on behalf of the residents of the ward I represent. A ward through which the proposed interconnector would pass, a ward whose residents would be seriously affected by these proposals.

Portsea Island is accessed from the mainland by just three roads. There are already frequent queues of traffic backing up onto the motorway and main trunk road network and air quality issues that are detrimental to human life. (According to the Office of National Statistics, Portsmouth is 135th out of 149 upper tier local authorities for poor air quality and 145 of 149 for road traffic volume ref <https://healthindex.lvp.uk.com>). Experience has shown that when there is an impediment on one of the arterial routes every problem is magnified. These proposals would only exacerbate those problems and, in my view, Aquind have failed to adequately address them. Traffic queues may be an inconvenient fact of life, but adding to them such that they become hazardous to life either through worsening air quality or dangerously stationary traffic is not acceptable.

It may not be a trunk road but Aquind have not even modelled the traffic flows along Farlington avenue and at it's junction with and along the B2177. Yet, as a ward councillor, I know this is a heavily used route, used by many to access Southdowns college and because routes in and out of Portsmouth are so congested.

Neither does there seem to be any consideration to the dangers posed to primary school children by taking the route of the interconnector either immediately outside one school and within 150m of another, or within 150m of both schools on the pedestrian route for pupils from both schools.

The environmentally sensitive sites affected by these proposals will have been highlighted by others and in not dwelling on those matters it should not be interpreted that I make light of them. However, I do wish to highlight the impact on open space and trees and the consequences of that impact.

It is not clear exactly how many trees will be felled by the Aquind proposals but as there are only 22,000 trees in Portsmouth compared to the 267,000 in

Southampton, a city of comparable population, the loss of a single tree would be unwelcome. Especially when considering the Government's declared intention to plant 11,000,000 trees by 2022.

Portsmouth is the most densely populated city outside of London and has only 760ha of accessible open space. Even then 189ha is the environmentally sensitive sites of Portsdown Hill and Farlington Marshes not suitable or available for the likes of football or cricket. If those sites are excluded, there is only 2.65ha of open space per 1000 people which is very poor compared to 4.51ha/1000 people for Southampton, or 5.60ha/1000 in Plymouth, both cities of comparable population.

There are only 25 full size football pitches and 5 cricket squares which are publicly accessible in Portsmouth and should this scheme progress at best there would be a 20% loss of pitches for at least one season and in some instances two seasons. In the worst case it could be as high as a 33% loss of provision. The prospect goes beyond the loss of one, or two, seasons however. As an ex-Sunday league player, I know that once a team is unable to participate for even a short period the likelihood is that team will not play as a team again. Certainly they would forfeit their place in their leagues because of being unable to fulfil their fixtures. The consequence being, in many instances, individuals would cease to participate in sport to the long term detriment of their health

Finally, there is a precedence for refusing these proposals. In May 1994 the Secretary of State called in a planning application by Portsmouth Football Club for the use of Farlington playing fields as a departure from the local plan. One of the reasons for refusal was the adverse effect on nature conservation. This was because Brent Geese, a protected bird, winter on Farlington playing fields (they also winter on some of the other sites Aquind propose using). Another reason was inadequate re-provision of pitches. *1

In summary, I have sought to demonstrate that while the Aquind proposals may not only inflict a temporary inconvenience they have the potential to inflict long term harm on Portsmouth residents and their environment.

I urge you to recommend these proposals be refused.

Steve Wemyss

Portsmouth City Councillor for Drayton and Farlington

*1 I was requested to send in details of the reasons for refusal cited by the Secretary of State in December 1994 (following a public Inquiry in May 1994) when an application by Portsmouth Football Club to build a new stadium at Farlington playing fields was refused. The relevant extracts were as follows (although I attach the full decision notice for completeness):

4. The minister of State agrees with the Inspector that the main issues to consider are the effects on nature conservation interests in Langstone Harbour and Farlington Marshes, the retail impact, the impact on amenity, accessibility, the effects on playing field provision, and the need for the proposal and the benefits from it.

5. Regarding nature conservation interests, the Minister of State notes, in particular, that the site is a prime winter feeding ground for nationally and occasionally internationally important numbers of birds, which roost in the Langstone Harbour Special Protection Area. This raises questions about compliance with international obligations as embodied in the EC Council Directive on the Conservation of Wild Birds. Having regards also to the Inspector's concern about the potential effects of changed waterflows on Farlington Marshes, and his view that the middle part of the site is nationally rare in botanical terms, he agrees that the proposed development would significantly prejudice nature conservation interests contrary to structure plan policy C3 and emerging local plan policy E3.

Within the Final Conclusions appendix to the letter:

12.4 Turning to the nature conservation topic, the site is next to a Ramsar Site & European Special Protection Area. It is prime winter feeding ground for over a tenth of the dark-bellied brent geese which roost in the protected zone: and, given the numbers involved, it is routinely of national importance & occasionally international importance in its own right. The development would entail destruction of part of this habitat, reducing its capacity by at least half. This would be on land informally protected for the last 10 years by the estuary management plan. The ability of other land to compensate for this loss is at best problematic, and so to my mind the loss would raise question about compliance with international obligations.

Kind regards

Steve Wemyss
Portsmouth City Councillor for Drayton and Farlington

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Director Planning

P J Frampton Esq Bsc(Hons) TP ARICS MRPTI
Wood Frampton
Aylesford House
70-72 Clarendon Street
Leamington Spa
Warwickshire CV32 4PE

Charles House
375 Kensington High St
London W14 8QH
GTN: 3570
Tel: 071 605 9012
Fax: 071 605 9249

14 December 1994

Your ref: PJF/DB/A031/PF/4670/LS
Our ref: SE2/5237/219/8

Dear Sir

**TOWN AND COUNTRY PLANNING ACT 1990 - SECTION 77
OUTLINE PLANNING APPLICATION BY PORTSMOUTH FOOTBALL CLUB FOR AN
ALL SEATER STADIUM AND ASSOCIATED RETAIL AND LEISURE AND RAILWAY
STATION, EASTERN ROAD, FARLINGTON, PORTSMOUTH.**

1. I am directed by the Minister* of State for Construction and Planning to refer to the above application for planning permission which has been referred to the Secretary of State for the Environment for decision under section 77 of the above Act.

2. Consideration has been given to the report of the Inspector, Mr C S McDonald MA (Oxon) DMA LMRTPI Solicitor, who held a public inquiry into the proposed development on 4 May to 29 June 1994. The Inspector, whose final conclusions are reproduced in the Annex to this letter, recommended that outline planning permission be refused. A copy of his report is enclosed.

3. In deciding this application the Minister of State has had regard to section 54A of the Town and Country Planning Act 1990. This provision requires him to determine the application in accordance with the development plan unless material considerations indicate otherwise. The Hampshire County Structure Plan, approved in December 1993, is of particular importance since there is no up to date adopted local plan covering the site. However the emerging Portsmouth City Local Plan has been considered at public local inquiry and proposed modifications have been published following the Local Plan Inquiry Inspector's report. The Minister of State concludes that since the Plan is close to adoption he can attach considerable weight to its policies and proposals.

4. The Minister of State agrees with the Inspector that the main issues to consider are the effects on nature conservation interests in Langstone Harbour and Farlington Marshes, the retail impact, the impact on amenity, accessibility, the effects on playing field provision, and the need for the proposal and the benefits from it.

5. Regarding nature conservation interests, the Minister of State notes, in particular, that the site is a prime winter feeding ground for nationally and occasionally internationally important numbers of birds, which roost in the Langstone Harbour Special Protection Area. He further notes the Inspector's concern that other existing or potential feeding grounds would not compensate for the loss of habitat due to the proposed development, and agrees that, although the site is outside the Special Protection Area, this raises questions about compliance with international obligations as embodied in the EC Council Directive on the Conservation of Wild Birds. Having regard also to the Inspector's concern about the potential effects of changed water flows on Farlington Marshes, and his view that the middle part of the site is nationally rare in botanical terms, he agrees that the proposed development would significantly prejudice nature conservation interests contrary to structure plan policy C3 and emerging local plan policy E3.

6. The Minister of State agrees with the Inspector that the retail element does not comply with policies set out in Planning Policy Guidance Notes PPG6 and PPG13, in that there is no specific locational justification for use of this site which is not located in or near an existing centre. He agrees that the retail element would have the makings of a new district centre on land not allocated for this purpose and in competition with existing centres. The Minister of State also considers that the retail proposal would be inconsistent with PPG13 in that despite the proposed public transport facilities, the development is to be reached mainly by journeys by private car. He agrees that the setting up of a major additional focal point for such journeys is contrary to structure plan policies T1 and S2(ii).

7. With regard to the possible impact on nearby centres the Minister of State agrees with the Inspector's views about deficiencies in the impact study. Despite the absence of clear evidence that the major retail development proposed would not harm the vitality and viability of nearby centres, he shares the Inspector's concerns about the impact on Drayton, Cosham and Havant. The Minister of State is therefore not satisfied that the proposal fully conforms with structure plan policy S2.

8. In respect of the physical and amenity impact of the proposed development, the Minister of State accepts that the western part of the site falls within the urban area and that the stadium could be conceived as an attractive structure at the City's edge, although there would be an irreversible and visually harmful loss of urban open space. However, even if that loss could be sustained, he agrees that the other elements of the proposed development and their car parks would have a harmful effect, which would not be offset by the landscaping indicated, contrary to structure and local plan policies E2.

9. With regard to accessibility the Minister of State agrees with the Inspector that the proposed vehicular access to the site would be contrary to guidance in Annex D of PPG13 and that in the absence of a safety audit, objection in principle should be upheld. He notes the Inspector's concern about the commitment to providing a new railway station and about the adequacy of

planning for bus and coach provision, although these are matters that could be subject to legal agreement.

10. The Minister of State agrees with the Inspector that the applicants and the City Council have failed to show that full alternative provision of equivalent community benefit could be made for the lost existing and proposed pitches at Farlington, and that the failure to make alternative provision causes a serious breach of emerging local plan policy LC6 which sets out the criteria in the event of the Club relocating.

11. On the question of the need for the Club to relocate, the Minister of State agrees that the need to improve on the existing ground at Fratton Park is incontestable and that a solution cannot be achieved within the confines of that ground. The problem then arises that the Club cannot afford to build a new stadium without other development to subsidise it, but without knowing the extent of the subsidy required and in the absence of a strategic site selection exercise, he agrees that the need for this development on this site has not adequately been established.

12. The Minister of State agrees with the Inspector that there would be undoubted benefits from the proposed development, in particular from the provision of a community leisure centre and railway station, but also from the advantages that relocation of the football stadium would bring in better crowd safety, the improvement of residential amenity at Fratton and the sustaining of civic pride from an exciting and imaginative project.

13. The Minister of State has given careful consideration to the policy in Planning Policy Guidance Note PPG17 which urges that sympathetic consideration be given to development proposals which are brought forward to comply with Lord Justice Taylor's recommendations in respect of all-seater football league stadia. However he agrees with the Inspector that each of the planning objections identified - the loss of prime winter feeding ground, the threat to an area of national botanical interest, the undermining of the retail strategy of the development plan by setting up a new district centre, the loss of open space, the creation of a shortfall in the provision of public sports pitches, and the inadequacy of the proposed access to the complex, are all powerful objections and should be upheld. The Minister of State considers that together they serve to outweigh such sympathetic consideration as can be given in line with the guidance in PPG17 and the benefits which have been identified. He considers that in respect of the possible effects on nature conservation interests in Langstone Harbour and Farlington Marshes, the retail impact, the impact on amenity, and the effects on playing field provision, the proposal conflicts with the development plan and there are no material considerations of sufficient weight to justify a decision other than in accordance with the plan.

14. The Minister of State therefore accepts the Inspector's conclusions and recommendation. Accordingly, for the reasons given by the Inspector and in this letter, the Minister of State hereby refuses planning permission for the proposed development.

15. A separate note is attached setting out the circumstances in which the validity of the Minister of State's decision may be challenged in the High Court.

Yours faithfully



J B WILSON
Director Planning

Authorised by the Minister of State for
Construction and Planning to sign in that behalf

*In view of his personal interest the Secretary of State for the Environment, the Rt Hon John Gummer MP, has taken no part in this decision which he has delegated to the Minister of State, the Rt Hon Viscount Ullswater.

11.0 CONDITIONS AND AGREEMENTS

Conditions

- 11.1 During the course of the Inquiry, the City and the Club agreed a list of conditions [COR/X/33] which supersedes those originally submitted by the City as COR/X/27. This section of my report is based on that list, but also takes account of the variations suggested by other parties, the majority of which are set out in COR/X/36.
- 11.2 Conditions 1 and 2 are standard time limit conditions, but Condition 3, while also concerned with the approval of reserved matters, should be deleted because it is partly a superfluous statement of the law and is otherwise dealt with by Condition 5. Condition 4 specifies the reserved matters, but as details of siting are no longer part of the application, the words 'The siting and design of' should start item 4(1). It was also agreed at the Inquiry that provision for access for the disabled should be added to item 4(3) and that the final proviso to the condition should be deleted so that it would end at 'first brought into use'.
- 11.3 In my view, Conditions 5 and 6 are crucial to the control of the development because they are concerned, respectively, with its phasing and the provision of a railway station. However, because it is most important that the station is brought into use at an early stage, I consider that, as was ultimately agreed, the possibility of an alternative timescale should be removed by deleting the words 'unless otherwise agreed in writing with the local planning authority' from Condition 6. Condition 7 deals with water run-off and is also important but, as was agreed, it should be expanded to require that no development shall take place until schemes for the provision of a geotechnical report and a site investigation for possible contamination, waste and leachate have also been agreed with the local planning authority and their recommendations have been implemented.
- 11.4 Conditions 8 and 9 are essentially concerned with the provision of playing pitches and they too are central to the proposal. It was agreed however that, for clarity, the first sentence of Condition 8 should be amended to read: 'No development shall commence until precise details of the arrangements to be made for the provision of public open space and playing pitches have been submitted to and agreed in writing by the local planning authority.' Similarly, the word 'relocated' should be substituted for 'replacement' in the second line of Condition 9 and, for consistency, should also replace 're-provided' in line 1 of the related Condition 12.
- 11.5 Condition 10 is acceptable, but I consider that Condition 11, which deals with external lighting and floodlighting, requires some amendment in order to allay the concerns of the Harbour Board. The words 'including the fixing thereof' should be added after 'floodlighting' in the second line and the following should be added to the second sentence: 'and to ensure that the development creates light levels no greater than those described in Docs. APP/D/32 and 33.'
- 11.6 Conditions 13-16 relate to the provision of access roads and car parking spaces, but a number of amendments were agreed at the Inquiry. In particular, the generally worded Condition 14 should be replaced by a condition listing the numbers of parking spaces to be provided, reflecting the schedule which

forms part of the site layout [COR/X/32], but also specifying the spaces to be allocated to disabled drivers, in accordance with the Council's standards. I therefore recommend that Condition 14 should read as follows:

'The development hereby approved shall not be brought into use until facilities for the parking of vehicles are provided in accordance with a scheme to be submitted to and approved in writing by the local planning authority and those facilities shall thereafter be retained. Car parking shall be provided in accordance with the following levels:

1. Stadium - not less than 4020 spaces (160), incorporating station car parking spaces on match days [see 5 below].
2. Retail - not less than 963 spaces (40).
3. Fast food (N) - not less than 56 spaces (4).
4. Fast food (S) - not less than 58 spaces (4).
5. Station - not less than 426 long term and 47 short term spaces (20).

The above provision shall including parking spaces for disabled drivers' vehicles of not less than the number shown in brackets in each category.'

It was also agreed that the first sentence of Condition 13 should be amended to read: 'None of the playing fields at the eastern end of the site shall be brought into use until the traffic light junction with the Eastern Road and the access road to the playing fields have been completed and are available for use in accordance with the approved specification, less the final carriageway and footpath surfacing.' In addition, the words 'together with details of street lighting and the method of disposing of surface water' should be deleted from Condition 15 because they duplicate Condition 4(4) and (7).

11.7 Conditions 17 and 18 refer to temporary measures to be taken during construction, but I consider that they are reasonable because of the scale and likely duration of the project. However, Condition 19 is unnecessary, in my view, because its requirement that the various parking areas are retained is covered by the revised Condition 14. Conditions 20-23 relate to various ancillary matters and are also reasonable, except that the words 'and implemented' should be added at the end of Condition 21. There would otherwise be no requirement for an approved scheme in respect of the service areas and means of refuse disposal to be carried out.

11.8 Conditions 24-27 are most important because they are concerned with control of noise levels. It should be noted that there is no condition which explicitly reflects the Club's intention that the stadium would not be used for pop concerts. I accept, however, the views expressed at the Inquiry that, while 'pop' could not be defined for the purpose of a planning condition, it would not be possible to stage such an event within the noise levels specified in Condition 25. On the other hand, I do consider that the control over the hours of use of amplification equipment exercised by Condition 24 should be applied to 'all' events by substituting that word for 'those' in line 3.

11.9 In my view, an amendment to Condition 25 is also desirable to take account of a concern expressed by the Nature bodies. The locations at which noise levels are to be measured should be expanded by adding the following to the end of the condition: 'and at positions within Farlington Marshes to be

agreed in writing by the local planning authority.' In addition, I consider that a further condition should be added to this group. I endorse Mrs Ottewell's view that pile driving at the site should only be carried out between 0800 hours and 2000 hours on weekdays and not at all on Sundays.

11.10 Conditions 28-31 are essentially concerned with drainage and are intended to prevent water pollution of the Farlington Nature Reserve. They are reasonable and necessary requirements. Condition 32 requires the provision of a barrier along the A27 frontage and the Nature bodies suggest that it should be extended along the whole of the boundary between the site and the local nature reserve to the east of the site. I consider that to be a reasonable proposal, given my special concern about the possible impact of increased human activity [para.5.51], and the Club's intention to provide means of enclosure in any event [para.7.7]. However I would point out that this condition merely stipulates some of the matters which should be submitted under Condition 4(5).

11.11 Condition 33 reflects the Club's intentions concerning the height of the buildings and Conditions 34 and 35 are also crucial because, respectively, they restrict the range of retail uses and restrict subdivision of retail floorspace. However, in order to reflect Circular 1/85, the words '(or any order revoking and re-enacting that Order)' should follow the reference to the General Development Order in Condition 34 and the reference to Class A1 of the Use Classes Order should be followed by 'or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order.' It was also agreed that Condition 35 would be more certain if it was to be based on the corresponding Condition (xvi) of the 'Hedge End decision' [HBC/C/9], namely: 'No retail unit shall be constructed or created by subdivision that is less than 1,000m² gross floorspace.'

11.12 The Nature bodies suggest that there should be further conditions controlling the use of lights and laser displays during events and the flying of advertising balloons and prohibiting the use of the site by aircraft and the like, or parachutists. I understand the underlying concern for amenity and for wildlife, but, in my judgement, the incidence, and therefore the impact, of such activities is unlikely to be so significant as to justify the controls proposed. I have also considered the remaining conditions put forward by other parties [COR/X/36] but, in my view, they are either unnecessary, do not relate to matters of proper planning control, or are dealt with by those which I am recommending.

Agreements

11.13 The Club has entered into agreements under Section 278 of the Highways Act 1980 and planning obligations [COR/E/15 and 16 and COR/X/34], which will of course only take effect if planning permission is granted.

11.14 In part, they are intended to ensure that improvements to the highway network are carried out and that they will be financed by the Club. Those improvements are listed in the Schedule to COR/E/15 and they reflect those agreed by the Club with the County as highway authority. However, for the reasons which I have given at para.8.70, I do not consider that the specified improvements to the Bedhampton roundabout [para.2(a) of the Schedule] are appropriate, but I do not recommend the Boroughs' further suggestion of a requirement for lighting improvements along the length of Havant Road within that borough.

11.15 The scope of the agreement which is COR/X/34 is more wide-ranging. Its Third Schedule reiterates those conditions which are concerned with the phasing of the development and paras.3(c),(d),(f),(g) and the Rider to the Fourth Schedule also describe matters which are the subject of conditions. It was argued that the conditions are thereby strengthened, but it is your clear policy [Circular 16/91 - Annex B, para.B6] that the terms of conditions imposed on a planning permission should not be re-stated in a planning obligation, because that would involve nugatory duplication and frustrate a developer's right of appeal. This, however, would be a matter for the parties to rectify.

11.16 The Nature bodies suggest that a further clause be added requiring the Club to fund the engagement of a half-time warden for ten years. The warden's duties would include the regulation of visitors to Farlington Nature Reserve and their cars and the collection of rubbish. The Club opposed the suggestion as being an excessive requirement and I agree with that view as a matter of law and policy, but without prejudice to the underlying planning objection.

11.17 Para.4 of the Fourth Schedule might be useful in that it requires prior agreement on all aspects of programming and phasing of the Development, some of which are not susceptible in practice to control by planning conditions. However I note that the definition of Development in the Second Schedule does not include off-site highway works or the traffic management envelope. The phasing of the off-street highway works is controlled by Clause 6 of the second highways agreement [COR/E/16]; and it would be impracticable to phase the traffic management envelope because its implementation is dependent on local acceptability.

12.0 FINAL CONCLUSIONS

12.1 The main considerations seem to me still to be those topics agreed before the inquiry.

12.2 The statutory development plan comprises the City of Portsmouth Development Plan 1956 & the recently approved replacement Hampshire County Structure Plan. The Portsmouth City Local Plan is also a primary consideration, as its preparation has reached the start of the last stages before adoption. The eastern part of the site is allocated for school playing fields by the 1956 Plan, with the remainder as public open space. The Local Plan would lay the middle part out as public playing fields, since that was not achieved under the 1956 Plan, but there is an obvious continuity between the Plans in respect of this site.

12.3 The Club's existing Fratton Park ground is allocated for private playing fields by the 1956 Plan. The Structure Plan does not contain a policy for the relocation of the ground. The Local Plan, however, would take account of the ground's adequacy & need for improvement in 2 ways. Policy GS5 would allow for an extension of the ground into the Fratton Goods Yard comprehensive development site if required. In the event of the Club being unable to undertake such an extension, Policy LC6 would support relocation provided that all of 4 criteria are met. But, since the Local Plan is not yet part of the statutory development plan, it appears to me that this application falls to be considered basically under paras.5 & 28 of PPG 1. It also seems clear that it merits sympathetic consideration under para.47 of PPG 17. There are nevertheless national, regional, and development plan & other local policies pertinent to all the topics; and emerging Local Plan Policies GS5 & LC6 remain of particular relevance.

12.4 Turning to the nature conservation topic, the site is next to a Ramsar Site & European Special Protection Area. It is prime winter feeding ground for over a tenth of the dark-bellied brent geese which roost in the protected zone: and, given the numbers involved, it is routinely of national importance & occasionally of international importance in its own right. The development would entail a destruction of part of this habitat, reducing its capacity by at least half. This would be on land informally protected for nature conservation purposes for the last 10 years by the estuary management plan. The ability of other land to compensate for this loss is at best problematic, and so to my mind the loss would raise question about compliance with international obligations.

12.5 Part of the middle of the site, although not a goose feeding ground, is nationally rare in botanical terms, and its invertebrate interest has yet to be assessed. This also would be lost. In addition, the current state of information leaves too much uncertainty about the hydrological effects of the development on the Local Nature Reserve which forms part of the protected area. Completion of the development would significantly increase the risk of excessive human disturbance of the edge of the Reserve. These direct & indirect detrimental effects on this protected land-locked bay would normally be contrary to Structure Plan Policy C3, and Local Plan Policies GS3 & E3, 12 & 17, as well as the estuary management plan.

12.6 On retail impact, Government guidance is no longer confined to PPG 6; and there is no need in shopping terms for the retail park element of the

development, nor any locational justification for it in terms of PPG 13 & RPG9. Together with other large stores just to the north, the development as a whole would have the makings of a new district centre, contrary to the development plan's shopping & transportation policies. Building the retail park on established public open space would also be in conflict with para.47 of PPG6 & Local Plan Policy S17.

12.7 This would be a major urban retail development for which national policy expects an extensive impact study from the developer. Unfortunately, this particular study is deficient in several respects, tending to understate the cumulative retail impact on existing centres. This is at a time when the nearby town centre of Havant is particularly fragile: and the district centre at Cosham plus local shops at Drayton must also be at some risk. Thus it is not possible to determine whether the development would comply with Structure Plan Policy S2 and Local Plan Policies S16 & LC6 in terms of impact.

12.8 Physically, the site is a place of transition between both town & country and coast & hinterland. The western part of the site is within the Portsmouth urban area, in my judgement, and the whole site contributes to the pleasant open setting as it is approached from the north-east. However, it cannot conceivably be regarded as within the strategic gap between Havant & Waterlooville: and I consider that the stadium would be largely on urban land, and could look pleasant, albeit prominent, beside & across Langstone Harbour.

12.9 On the other hand, the buildings would involve an irreversible & visually harmful loss of urban open space in this locality, contrary to Local Plan Policies GS3, OS1 & E12. This would be exacerbated by the detrimental impact of new buildings & roads on the landscaped setting of a length of main road. There would also be some risks of lighting interfering with local navigation, and of occasional noise annoyance from musical events at the stadium. However, I consider that a robust line should be taken over coping with the inevitable transitory congestion of the urban area around matches. Straightforward & practicable policing steps should normally suffice to forestall major safety & public order problems, with the introduction of a permanent traffic management scheme for residential areas being an unnecessary precaution.

12.10 As to accessibility, my judgement is that more commitment is required from the rail authority & the potential train operator before there can be confidence that the railway station would be provided in pursuance of the developer's obligations. There should also be a long-term car park exclusively for the station. The planning so far of coach & bus provision has simply been inadequate.

12.11 Given official strategy now to manage demand for transportation in urban areas, some of the debate about the accuracy of the developer's traffic predictions is not particularly constructive, in my view. However, it is unlikely that the worst case has been covered, and there are some junction-specific problems with the approach from the north-east along Havant & Eastern Roads. In particular, there should be re-consideration of the proposed improvements to the Bedhampton roundabout.

12.12 A principal problem is that the site's vehicular access would be a new junction with the county distributor near a crest formed by the railway bridge, contrary to the clear guidance in Annex D to PPG 13. A detailed

examination of the proposed remedy for this faces some problems with interpreting the appropriate standards. But, in the absence of a safety audit, it seems to me that southbound forward visibility would still be unsatisfactory; there would be a conflict with Local Plan Policies T2 & T3(a); and the objection of principle should be upheld. The emergency vehicular access would also be unsatisfactory, conflicting with Government advice on safety at sports grounds in being slow, circuitous & liable to be obstructed. Therefore I consider that approval should be withheld of the details of the means of motor vehicular access to the site.

12.13 Other details of access & parking have been treated as indicative only at this stage, but I regard the concept of a single large outer car park, served by the same internal road as all the rest of the development, as unworkable. This would confirm the fears of considerable overspill parking, albeit mainly into industrial areas. More thought also needs to be given to the internal arrangements for cyclists & pedestrians.

12.14 The development would displace altogether from the site 5 existing & 2 potential public sports pitches, for which alternative provision of equivalent community benefit should be made available, according to both national & local policy. However, permanent availability is not on offer; and the physical provision suggested would rely on land which has failed to sustain public pitches before, and is in any event earmarked for other open space requirements.

12.15 A remedy tentatively suggested by the City is to bring forward land previously expected to become available in the next decade. But that does not seem to me to be a sustainable approach, and I also have grave doubts whether the land could physically be made available any sooner. Although the Club seeks in a way to make amends by taking over the funding of some other pitches from the public sector, that would be inadequate recompense in my view for causing the basic shortfall. This would be a failure to meet the second essential criterion of Policy LC6.

12.16 Looking at the need & benefits on the other side of the overall balancing exercise, the Club's need to improve on its existing ground is incontestable. I accept that it could not produce a modern, first-class stadium within the present confines of Fratton Park. However, it seems that its basic problem, once that point is disposed of, is that on its own it cannot afford to build a modern stadium at all. Unfortunately, it has not made clear how much finance it can raise from its own resources. Moreover, there has not been a strategic site selection exercise in consultation with the planning authorities, and so there cannot be confidence at present that Farlington is the most appropriate site for building a subsidised stadium. Finally, the Club has failed to show that the development now proposed there would be viable in any event.

12.17 Accordingly, for the time being, no weight can be attached, in my judgement, to the argument that there is a need for this development on this site. Nevertheless there would be the undoubted benefits of the provision of a community leisure centre and the railway station, subject to confirmation. Also there would be the whole package of benefits to the City represented by the sympathetic consideration of the application requested by PPG 17.

12.18 I consider that, looking sympathetically at the proposal and weighing the disadvantages against those benefits, some of the objections outlined

above should not prevail in this case. However; I still regard the loss of prime winter feeding ground for over a tenth of the brent geese which roost in the internationally protected area as a matter of grave importance. It would also be regrettable that an area of national botanical interest would disappear, and before its invertebrate interest could be established. In addition, the tendency to set up a new district centre would seriously undermine the retail strategy of the development plan. The combination of the visual loss of open space with the creation of a shortfall in the provision of public sports pitches would be an unwarranted blow to the amenities of this part of the City. Finally, the accessibility of the complex would be generally inadequate, with some unfortunate hazards in the proposed normal & emergency vehicular accesses. Each of these planning objections is powerful and should be upheld, in my view, notwithstanding the benefits, and in the face of the sympathetic consideration.

12.19 If permission is to be granted, then I commend the imposition of conditions as discussed in Section 11.0 of this report. But I consider that permission should not be granted, for the reasons set out above.

13.0 RECOMMENDATION

13.1 I recommend that outline planning permission be REFUSED.

I have the honour to be
Sir
Your obedient servant

C S McDonald

PARTICIPATING BODIES

<u>Body</u>	<u>Short name in report</u>	<u>Abbreviation for documents</u>
Portsmouth Football Club Ltd (applicant)	the Club	APP
Portsmouth City Council (local planning authority)	the City	PGC
Portsmouth FC Supporters Club	the Supporters	PFCS
Fareham & Havant Borough Councils (adjoining planning authorities)	the Boroughs	HBC
J Sainsbury plc	Sainsbury	JS
Hampshire County Council (county planning authority)	the County	HCC
English Nature/Royal Society for Protection of Birds/Hampshire & IOW Wildlife Trust	the Nature bodies	ENAT
Portsea Island Mutual Co-operative Society Ltd/ Portsmouth Area Co-operative Community Council	the Co-op	PIMCO
Langstone Harbour Board	the Harbour Board	LHB
Cosham Traders	Cosham Traders	CT
Drayton Traders Association	Drayton Traders	DTA
Central Southsea Traders Association	Southsea Traders	-
Gauntlett Trust (owners of The Precinct, Waterlooville)	Gauntlett Trust	GT
Portsmouth Green City Campaign	the Campaign	PGC
Portsmouth Football Association	the Local FA	PFA

For the Local Planning Authority

Mr Barry Peters Smith, Solicitor,
Head of Legal Services to
Portsmouth City Council

Who called the following witnesses -

Paul Newbold BSc (Econ)(Hons) DipTP
MRTPI
Assistant City Planning Officer

David J Knight BEd(Hons) CertEd
MILAM
Head of Leisure Service, Portsmouth City
Council

George Perrett
Section Engineer
Development Control Division
Hampshire County Surveyor's Department

Portsmouth Football Club Supporters Club

Mr Ashley Brown, Chairman of the Club Who called the following witnesses -
assisted by Mr Cyril Saunders
(who also appeared as a witness)

John Moore
Andrew Dean
Bob Haines
John Bramble

(The Supporters Club also represented Tracy Barber, Kerry Stanhope and Shirley Woodison)

For Havant and Fareham Borough Councils

Mr Peter Towler of Counsel,
Instructed Jointly by the Borough
Councils

Who called the following witnesses -

Brian P Raggett PhD MRTPI ARICS
Partner in Hillier Parker

Richard Parker BSc DipTE CEng MICE
MCIT
Senior Partner
The Richard Parker Consultancy
Consulting Engineer

For J Sainsbury Plc

Mr Stephen Ashworth, Solicitor
of Denton Hall
Instructed by J Sainsbury Plc

Who called the following witness -

Anthony Brown BA MCIT MIHT
Partner, Mayer Brown Partnership
Highways and Traffic Consultant

PORTSMOUTH FOOTBALL CLUB PLANNING APPLICATION

LAND AT FARLINGTON

Public Local Inquiry

LIST OF APPEARANCES

For the Applicant (Portsmouth Football Club Ltd)

Mr Harry Wolton, Queen's Counsel
Instructed by Wood Frampton,
Chartered Town Planning Consultants
and Chartered Surveyors

who called the following witnesses -

Rod Sheard DipArch RIBA ARAIA Reg Arch
Chairman, Lobb Partnership Ltd

Martin Thorp BA FCA MSI
Partner with Arthur Andersen & Co

David K Peacon,
Vice Chairman - Chief Commercial
Executive, Portsmouth Football Club Ltd

Michael E Westcott BSc MPh MIA
Senior Acoustics Engineer, Highways
Division, Mott MacDonald Group

Martin A Fellows BA(Hons) DipTP MRTPI
Associate Partner in the Planning
Department at Knight, Frank & Rutley

Peter J C Garden, BSc(Hons) MSc
MIHE Principal Engineer, Mott
MacDonald Group

Kelvin J Austin BSc CEng MILE MCIBSE
Lighting Engineer, Abacus Lighting

Alison Stuck, BSc MSc MIWEM MBHS
Senior Hydrologist Mott MacDonald Group

John Hyland DipLA FLA
Director, Hyland Edgar Driver, Landscape
Architects

Margaret Hill MA PhD MIEEM
A Director of the Environmental Advisory
Unit Ltd

Peter J Frampton BSc(Hons) TP ARICS
MRTPI Partner, Wood Frampton, Chartered
Town Planners and Chartered Surveyors.

For Hampshire County Council

Mr Simon Best, Solicitor,
County Secretary's Department

Who called the following witnesses -

Robert Savage BA MCP MRTPI FRSA
County Planning Officer

Andrew Ford BA(Hons) DipTP MRTPI
Senior Planning Officer

For English Nature/RSPB/Hampshire Wildlife Trust

Mr John Saulet, Solicitor
Instructed by English Nature/RSPB/
and the Hampshire Wildlife Trust

Who called the following witnesses -

Colin R Tubbs MIBiol CBIol
Consultant in Ecology & Conservation and
Visiting Fellow, University of
Southampton

Robert A Chapman BSc
Warden, Farlington Marshes Local Nature
Reserve

For Portsea Island Mutual Co-Operative Society Ltd

Mr David Wolfe of Counsel
Instructed by Apcar Smith, Planning
Consultants and assisted by Mr G Wade

Who called the following witnesses -

David Smith BSc MSc DipUPI
MRTPI Partner, Apcar Smith

Sarah Fry, Chairperson, Portsmouth Area
Co-operative Community Council

For the Langstone Harbour Board

Mr Stephen Kerr, BA(Lond), Solicitor,
Assistant Clerk to the Board

Who called the following witnesses -

Robert W Russell, OBE
Member of Langstone Harbour Board, and
Vice Chairman of the Advisory Committee

Captain Philip Hansen,
Harbour Manager and Harbour Master to
The Langstone Harbour Board

For Cosham Traders

Mr G Bevis
(Who also appeared as a witness)

For Drayton Traders Association

Mr M E Mead, Chairman
(Who also appeared as a witness)

For Central Southsea Traders Association

Mrs Simone McKeon, Chairperson,
(Who also appeared as a witness)

For The Gauntlett and Hill Trust (Owner of The Precinct, Waterloooville)

Mr Bryan Jezeph BA DipTP FRICS MRTPI
(Who also appeared as a witness)

For the Portsmouth Green City Campaign

Mr Rob Cottee (Chairman), (who also
appeared as a witness) and was
assisted by Mrs Sue Organ and
Mr Alan Pile

Who called the following witnesses -

Alan Whitehead,
Professor of Public Policy, Southampton
Institute of Higher Education

Roger Butler CEng MStructE

Murray Lang

Judy Hoad

Hillary Bagshaw MB FRCS
General Practitioner Drayton

For The Portsmouth Football Association

Mr Bert Greenwood, General Secretary

Who called the following witness -

Les Jones, Vice-President of the
Association and Secretary of the
Portsmouth & District Football League

INTERESTED PERSONS

Supporters

Councillor Dr Alan Burnett, former Leader of the City Council and Havelock Ward Councillor

Mr Peter Houghton

Mrs Kath Kettlewell

Mr Keith Christie

Mrs Katrina Bray

Mr John Westwood

Councillor Mavis Southwell, Milton Ward Councillor

Councillor Stan Southwell, Fratton Ward Councillor

Professor Jim Riordan

Mrs Sheila Spurgeon

Mr Nigel P Drake

Mr Charles Mos

Mr Mike Hall

Mr Alan Robinson

Objectors

Councillor Fred Warner, Drayton and Farlington Ward Councillor

Mr D J Hewlett

Mr K W Nicholson (Also representing Mrs B S Nicholson)

Mr D Webb (Also representing residents of Auriol Drive)

Mr C Davis

County Councillor Stuart Juniper, Drayton and Farlington Ward Councillor

Mr M Giles

Mr P B Hollamby

Mrs Sue Davies (Also representing Mrs P Garner, Mr H C Smith and Mr N Davies)

Mr Godfrey Joly

Mr A P Fish

Mr C J Gardner

Mrs S Humphries

Mr R Masterton

Mr J C Ottewell

Mr A Bunnage

Mr O Bowdler

Mr B J Hoad

Mr K Hampton

Mrs C Willis

Councillor Ian G Gibson OBE, Drayton and Farlington Ward Councillor

Councillor Barry Maine, Drayton and Farlington Ward Councillor

Mrs S J Ottewell

Mrs J R Fish

Mrs K Boshier

Mr R Burnett

Mr D Denny

Miss M Hyslop

Mr A Pile (Also representing Mrs J Pile)

Mr K Roughsedge

Mr K Sparrow

Mr J M Cross

Mrs J Cross

Mr C A E Parkin

PORTSMOUTH FOOTBALL CLUB - PUBLIC LOCAL INQUIRY

LIST OF DOCUMENTS, PLANS AND PHOTOGRAPHS SUBMITTED TO INQUIRY

Ref No.	Description/Remarks
	<u>GENERAL DOCUMENTS</u>
INQ/X/1	Attendance List
INQ/X/2	Notification of Inquiry dated 15 February 1994, sent to those making representations about the planning application.
	<u>CORE DOCUMENTS</u>
COR/A/1	City Development Plan 1956 - Written Statement.
COR/A/2	Hampshire Structure Plan.
COR/A/3	Deposit Version of Portsmouth City Local Plan.
COR/A/4	Inspector's Report on City Plan dated 10/12/93.
COR/A/5	Map extract from City Development Plan. (Opposite Page 25 of Update Document COR/X/1).
COR/A/6	Map extract from Deposit Version of Portsmouth City Local Plan (Opposite Page 31 of Update Document COR/X/1).
COR/A/7	Report by City Planning Officer entitled "Portsmouth City Local Plan: Report of the Inspector and Proposed Modifications", together with Supplementary paper.
COR/A/8	Minutes of Special Planning Committee on 1 June 1994.
COR/B/1	Landscape & Environmental Report with Appendices dated April 1993.
COR/B/2	Preliminary assessment by Mott MacDonald of design criteria for balancing pond. (Appendix 1 of Update Document COR/X/1)
COR/B/3	HGP letter dated 10/6/93 with drawings prepared by Hyland Edgar Driver showing hydrological information and site cross sections including spot heights and falls. (Appendix 1 of Update Document COR/X/1)
COR/B/4	Hyland Edgar Driver letter dated 16/6/93 re: surface water drainage. (Appendix 1 of Update Document COR/X/1)
COR/C/1	G L Hearn Preliminary Retail Study dated May 1993.
COR/C/2	G L Hearn letter dated 27/8/93 re: Preliminary Retail Study (Appendix 1 of Update Document - COR/X/1)
COR/C/3	G L Hearn letter dated 8/10/93 - Retail Impact Study methodology. (Appendix 1 of Update Document - COR/X/1)

Ref No.	Description/Remarks
COR/C/4	G L Hearn letter dated 19/10/93 - Retail Impact qualitative factors (Appendix 1 of Update Document - COR/X/1)
COR/C/5	Wood Frampton letter dated 31/3/94 - range of goods to be sold. (Appendix 2 of P.S. Newbold's Proof of Evidence - part 2)
COR/C/6	Report of P.C.C. Head of Marketing, Strategy and Economic Development dated May 1993 - "Retail Trends in Portsmouth". (Appendix 4 of P S Newbold's Proof of Evidence - Part 2)
COR/C/7	13 tables on retail impact. (Appendix 4 of P S Newbold's Proof of Evidence - Part 2)
COR/C/8	Extract from Hampshire County Structure Plan (Review) - Retailing Trends in Hampshire, published January 1994. (see also GT/C/6)
COR/D/1	Mott MacDonald Noise Impact Assessment dated May 1993.
COR/E/1	Mott MacDonald plan 22349/RC/01/P6 - agreed highway design for Eastern Road junction. (Also Document APP/E/19).
COR/E/2	Mott MacDonald Traffic Impact Study dated May 1993.
COR/E/3	Mott MacDonald letter dated 16/6/93 re: car park charging. (Appendix 1 of Update Document - COR/X/1)
COR/E/4	Mott MacDonald Traffic Impact Study dated June 1993.
COR/E/5	Mott MacDonald Traffic Impact Assessment into single access alternatives dated June 1993.
COR/E/6	Mott MacDonald letter dated 10/8/93 - Traffic Management in Drayton & Farlington. (Appendix 1 of Update Document - COR/E/6)
COR/E/7	Mott MacDonald letter dated 12/8/93 - residents' parking. (Appendix 1 of Update Document COR/X/1)
COR/E/8	Mott MacDonald letter dated 12/8/93 - traffic management proposals - Havant Road. (Appendix 1 of Update Document - COR/X/1)
COR/E/9	Mott MacDonald letter dated 6/9/93 - residents' parking. (Appendix 1 of Update Document - COR/X/1)
COR/E/10	Mott MacDonald letter to County Surveyor dated 30/9/93 - off-site highway improvements. (Appendix 1 of Update Document - COR/X/1)

Ref No.	Description/Remarks
COR/E/11	Hyland Edgar Driver letter dated 17/9/93 re: incidental public open space including Geoweb and Geoblock brochures relating to reinforcements for grass on overflow car park. (Appendix 1 of Update Document - COR/X/1)
COR/E/12	Proposed controlled access area (Plan G). (Opposite Page 19 of Update Document - COR/X/1)
COR/E/13	Extract from Hampshire County Council Rapid Transit Brochure published Autumn 1992, showing Gosport, Portsmouth, Fareham proposed route.
COR/E/14	Guide to Safety at Sports Grounds published 1990 by HMSO.
COR/E/15	Deed of Agreement dated 21 June 1994, under Section 278, Highways Act 1980, between Portsmouth Football Club, Hampshire County Council, Portsmouth City Council and St Johns in respect of various on and off site highways works.
COR/E/16	Deed of Agreement dated 21 June 1994, Supplemental to Deed of Agreement of 21 June 1994 under Section 278 Highways Act 1980, between Portsmouth Football Club Ltd, Hampshire County Council, Portsmouth City Council and St Johns in respect of various highways and associated works.
COR/F/1	HGP letter dated 20 August 1993 - future employment levels. (Appendix 1 of Update Document - COR/X/1)
COR/F/2	Portsmouth F.C. letter dated 25 August 1993 - recreational facilities within stadium. (Appendix 1 of Update Document - COR/X/1)
COR/G/1	HGP site plan (east) 92/A32/42 (layout superseded) - playing field area. (Appendix 1 of Update Document - COR/X/1)
COR/G/2	HGP letter dated 29 September 1993 - replacement playing fields. (Appendix 1 of Update Document - COR/X/1)
COR/G/3	Additional Drawings 92/A32/SK03A, 3B, 4A, 6 & 7 submitted to City Council on 19/10/93 - playing field layout for site and relocation alternatives.
COR/G/4	HGP letter dated 13 April 1994 - enclosing Drawings 92/A32/50C, 50D & 51B showing playing field options A & B for Tangier Road and Dundas Lane.
COR/G/5	HGP letter dated 13 May 1994 to County Education Officer - enclosing Drawing 92/A32/50E showing revised playing field option for Tangier Road.
COR/G/6	Booklet - 'Playing Fields at Risk' published by the National Playing Fields Association.

Ref No.	Description/Remarks
COR/H/1	Third Party representations to the City Council including Schedules.
COR/H/2	Representations from Statutory and Non-Statutory Consultees to the City Council
COR/H/3	Written representations submitted to the Secretary of State, including Schedules.
COR/H/4	Letters to the Secretary of State from MPs and members of the City and County Councils and Schedule.
COR/H/5	Example of letter and reply slip distributed by Milton Liberal Democrats.
COR/X/1	City Planning Officer - Update Document.
COR/X/2	Map A - Location Map (Opposite Page 11 of Update Document - COR/X/1)
COR/X/3	Map B - Land Use Plan (Following Map A in Update Document COR/X/1)
COR/X/4	HGP letter dated 20 April 1993 accompanying application.
COR/X/5	Planning Application Form.
COR/X/6	Certificate of Ownership.
COR/X/7	Brochure accompanying application.
COR/X/8	HGP existing site plan 92/A32/38.
COR/X/9	HGP site location plan 92/A32/39.
COR/X/10	HGP letter dated 29/4/93 - amended description. (Appendix 1 of Update Document - COR/X/1)
COR/X/11	HGP letter dated 8/6/93 - amendments to proposal. (Appendix 1 of Update Document - COR/X/1)
COR/X/12	HGP Plan 92/A32/41A - Site plan (west) Stadium & Retail area. (layout superseded)
COR/X/13	Amended Brochure annotated "Addendum Drawings" with associated plans from LOBB Sport received 27/8/93.
CPR/X/14	Applicant's response document - summarising main arguments supporting proposals - submitted to Planning Committee on 14 September 1993. (Appendix 1 of Update Document - COR/X/1)
COR/X/15	Report by City Planning Officer to Planning Committee on 14/9/93 with Appendix.
COR/X/16	City Planning Officer's Supplementary Report.

Ref No.	Description/Remarks
COR/X/17	Second Supplementary Report on financial viability.
COR/X/18	City Planning Officer's Third Supplementary Report.
COR/X/19	Submissions received at Planning Committee on 14/9/93.
COR/X/20	Minutes of Planning Committee on 14/9/93.
COR/X/21	HGP letter dated 11/10/93 - Amendments to overflow car park and open space provision. (Appendix 1 of Update Document - COR/X/1)
COR/X/22	Submissions at City Council meeting on 19/10/93.
COR/X/23	Minutes of City Council on 19/10/93.
COR/X/24	Correspondence with DOE prior to submission of planning application.
COR/X/25	Correspondence with Football Licensing Authority.
COR/X/26	HGP letter dated 20 April 1994 enclosing Drawing No.92/A32/41C - updated red line site layout drawings for site (east & west).
COR/X/27	Suggested planning conditions & legal agreements. (Appendix 5 of P S Newbold's Proof of Evidence - Part 2)
COR/X/28	Key diagram based on aerial photograph of the locality (Plan C). (Following Map B in Update Document - COR/X/1)
COR/X/29	Plan showing layout of the proposed stadium and retail elements (Plan D). Opposite page 13 in Update Document - COR/X/1)
COR/X/30	1991 Census Ward Profiles - Key Facts and Figures for Portsmouth, published Spring 1994 by Portsmouth City Council Strategy Unit.
COR/X/31	Document prepared by Wood Frampton, dated 1 June 1994, and signed by representatives of Portsmouth Football Club and Portsmouth City Council on 23 June 1994 setting out details of all documents comprising the submitted planning application.
COR/X/32	Plan - Site Layout Stadium, (Revision E)
COR/X/33	Document setting out details of proposed conditions, as agreed between the applicant and the Local Planning Authority (subject to applicant entering into Section 106, Town & Country Planning Act 1990 and Section 278 Highways Act 1980 agreements).
COR/X/34	Deed of Agreement dated 23 June 1994 under Section 106 of the Town and Country Planning Act 1990 between Portsmouth City Council, Portsmouth Football Club Ltd, and St Johns in respect of Farlington Playing Fields and St Johns College Playing Fields.

Ref No.	Description/Remarks
COR/X/35	Document setting out correction to Update Document COR/X/1.
COR/X/36	Conditions and amendments to agreements suggested by parties other than the City Council and the Club.
	<u>APPLICANT'S DOCUMENTS</u>
APP/A/1	Extracts from the City of Portsmouth Development Plan 1956.
APP/A/2	Plan WF1 showing strategic gaps around Havant.
APP/A/3	Plan WF3 showing the location of playing pitches proposed in the Portsmouth City Local Plan.
APP/B/1	Granswick P.A., Kirby, J.S. & Waters R.J. (1992). Wildfowl and Wader Counts 1991-92. Wildfowl and Wetlands Trust.
APP/B/2	Clark, J.M & Eyre, J.A. (1993). Birds of Hampshire. Hampshire Ornithological Society.
APP/B/3	Tubbs, C.R. and Tubbs, J.M. (1982). Brent geese Branta bernicla bernicla and their food in the Solent, Southern England. Biological Conservation, 23, 33-54.
APP/B/4	Round, P. (1982). Inland feeding by brent geese Branta bernicla in Sussex, England. Biological Conservation, 23, 15-32.
APP/B/5	Mitchell, C and King, R (1993). An assessment of breeding success in the dark-bellied brent geese Branta b. bernicla in 1993. Wildfowl and Welands Trust report.
APP/B/6	Potts, P (1993). Report to RSPB.
APP/B/7	Chapman, R.Polkey, A. Counts for the Farlington playing fields.
APP/B/8	British Trust for Ornithology. Langstone Harbour wader counts.
APP/B/9	Wildfowl and Wetlands Trust. Langstone Harbour and Farlington Sector wildfowl counts.
APP/B/10	Summers, R.W. & Critchley, C.N.R. (1990). Use of grassland and field selection by brent geese Branta bernicla. Journal of Applied Ecology, 27, 834-846.
APP/B/11	Summers, R.W. & Underhill, L.G. (1991). The growth of the population of dark-bellied brent geese between 1955 and 1988. Journal of Applied Ecology, 28, 574-585.
APP/B/12	Rodwell, J. (1991, 1992 and unpublished). British Plant Communities. Volume 3 Grassland and montane communities draft manuals for swamps, saltmarsh vegetation.

Ref No.	Description/Remarks
APP/B/13	Perring, F.H. & Walters, S.M. (1990). Atlas of the British Flora. Botanical Society of the British Isles.
APP/B/14	Nature Conservancy Council (1989). Guidelines for the Selection of Biological SSSIs.
APP/B/15	Townsend, F (1904). Flora of Hampshire.
APP/B/16	Fitzgerald, R. (1989) "Lost and Found" - Alopecurus bulbosus Gouan in S.E. England. Watsonia, 17, 425-428.
APP/B/17	Roberts, E.T, Roberts, G.C.M. and Potts, P.M. (1990). Survey of Milton Common and Lakes, Portsmouth.
APP/B/18	Nature Conservancy Council (1989). Urban Wildlife Now. No.4 Urban wetlands for nature conservation and stormwater control.
APP/B/19	Comparison of Peak Counts at Langstone for Brent Geese.
APP/B/20	Mitigation Areas for Dark Bellied Brent Geese.
APP/B/21	Table showing Wildfowl and wader counts in Langstone Harbour (Winter).
APP/B/22	Table showing Wader average peak counts in Langstone Harbour (Autumn).
APP/B/23	Table showing population trends of selected overwintering species in Langstone Harbour 1955-1990.
APP/B/24	Two tables showing summary of data collected for the City and St Johns Playing Fields.
APP/B/25	Table showing counts in the Farlington Playing Fields during the EAU site visits 1994.
APP/B/26	Table showing monthly average counts and average winter peak for brent geese.
APP/B/27	Table showing results of water quality analysis.
APP/B/28	Map showing boundary of Langstone Harbour SSSI/SPA Ramsar site.
APP/B/29	Map showing Boundary of the Farlington Marshes Local Nature Reserve.
APP/B/30	Two figures showing trends in the Langstone Harbour. North-west European and British populations of dark bellied brent geese.
APP/B/31	Extract from 1872 Ordnance Survey Plan showing the Application Site.

Ref No.	Description/Remarks
APP/B/32	Extract from 1897 Ordnance Survey Plan showing the Application Site.
APP/B/33	Plan showing potential terrestrial feeding sites for brent geese.
APP/B/34	Vegetation Map.
APP/B/35	Map showing location of water samples.
APP/B/36	Plan showing Geology of proposed Farlington Parkway, submitted by Alison Stuck.
APP/B/37	Plan showing open ditches at Proposed Farlington Parkway, submitted by Alison Stuck.
APP/B/38	Plan showing location of balancing pond, submitted by Alison Stuck.
APP/B/39	Plan showing typical detail of wet balancing pond construction submitted by Alison Stuck.
APP/B/40	Hydrology Report, dated April 1994, prepared by Mott MacDonald.
APP/B/41	Details of Flygt Submersible Pumps.
APP/B/42	Graph Showing Comparison between the National Population and Peak Count at Langstone Harbour.
APP/B/43	Graph showing Comparison between the National population and Peak Count at Langstone Harbour on a logarithmic scale.
APP/B/44	Extract from Wildfowl and Wader Counts 1987-88.
APP/B/45	Extract from Wildfowl and Wader Counts 1991-92.
APP/C/1	Table showing population, 1991-1997, submitted by Martin Fellows.
APP/C/2	Table showing expenditure per capita, submitted by Martin Fellows.
APP/C/3	Table showing expenditure in Catchment area, submitted by Martin Fellows.
APP/C/4	Table showing details of floorspace in Catchment area 1994, submitted by Martin Fellows.
APP/C/5	Details of additional floorspace committed or proposed - implemented by 1997, submitted by Martin Fellows.
APP/C/6	Tables showing turnover in Catchment Area 1994.
APP/C/7	Table showing quantitative analysis 1994 of Shopping Areas.

Ref No.	Description/Remarks
APP/C/8	Table showing turnover impact 1997 on Shopping Areas.
APP/C/9	MAP showing Catchment Area, 5-10-15 minutes from the Appeal Site.
APP/C/10	Goad plan showing Commercial Road Shopping Centre.
APP/C/11	Goad plan showing Palmerston Road Shopping Centre.
APP/C/12	Goad plan showing Cosham District Shopping Centre.
APP/C/13	Goad plan showing North End Shopping Centre.
APP/C/14	Goad plan showing Fratton Shopping Centre.
APP/C/15	Goad plan showing Fareham Town Centre.
APP/C/16	Goad plan showing Havant Town Centre.
APP/C/17	Goad plan showing Waterlooville Town Centre.
APP/C/18	Letter dated 12 April 1994 from Wood Frampton to Havant Borough Council about retail trade planning conditions. (also Doc HBC/C/6).
APP/C/19	Letter dated 16 December 1992 from PIMCO to the City Planning Officer relating to Local Plan Deposit Version Policy S16.
APP/C/20	Letter dated 21 December 1992 from PIMCO to the City Planning Officer relating to proposed amendments to Local Plan Deposit Version Policies S16A(ii) and LC6.
APP/C/21	Letter dated 6 January 1993 from PIMCO to the City Planning Officer objecting to policies S16A and LC6 in the Deposit Version of the Portsmouth City Local Plan.
APP/D/1	Table showing predicted noise levels from the stadium.
APP/D/2	Table showing predicted noise levels at selected sites: for crowd related noise.
APP/D/3	Table showing predicted noise levels at selected sites: for musical events, including figures.
APP/D/4	Extract from the draft HSE Guide to Health, Safety and Welfare at Pop Concerts and other similar events.
APP/D/5	Table showing measured background noise levels in the surrounding residential area, and accompanying plans.
APP/D/6	Drawing showing Planning Context.
APP/D/7	Drawing showing Landscape Context.

Ref No.	Description/Remarks
APP/D/8	Drawing showing zone of visual influence
APP/D/9	Drawing showing visual impact sections 1-3
APP/D/10	Drawing showing visual impact sections 4-6
APP/D/11	Drawing showing visual impact viewpoint 1 existing
APP/D/12	Drawing showing visual impact viewpoint 1 proposed
APP/D/13	Drawing showing visual impact viewpoint 2 existing
APP/D/14	Drawing showing visual impact viewpoint 2 proposed
APP/D/15	Drawing showing visual impact viewpoint 3 existing
APP/D/16	Drawing showing visual impact viewpoint 3 proposed
APP/D/17	Drawing showing visual impact viewpoint 4 existing
APP/D/18	Drawing showing visual impact viewpoint 4 proposed
APP/D/19	Drawing showing visual impact viewpoint 5 existing
APP/D/20	Drawing showing visual impact viewpoint 5 proposed
APP/D/21	Drawing showing visual impact viewpoint 6 existing
APP/D/22	Drawing showing visual impact viewpoint 6 proposed
APP/D/23	Drawing showing visual impact viewpoint 7 existing
APP/D/24	Drawing showing visual impact viewpoint 7 proposed
APP/D/25	Drawing showing Landscape Proposals 1 (a)
APP/D/26	Drawing showing Landscape Proposals 1 (b)
APP/D/27	Drawing showing Landscape Proposals 2 (a)
APP/D/28	Drawing showing Landscape Proposals 2 (b)
APP/D/29	Drawing showing Landscape Proposals 3
APP/D/30	List of Adjacent Existing Buildings and approximate sizes.
APP/D/31	Paper from MOWLEM about piling and infrastructure requirements for new stadium.
APP/D/32	Drawing prepared by Abacus Municipal Ltd illustrating horizontal overspill details relating to side floodlighting scheme.
APP/D/33	Drawing prepared by Abacus Municipal Ltd illustrating vertical overspill details relating to side floodlighting scheme.

Ref No.	Description/Remarks
APP/E/1	Traffic Impact Study, Summary Report, dated April 1994, (2 volumes), prepared by Mott MacDonald.
APP/E/2	Farlington Parkway Station - Assessment of viability - dated April 1994, prepared by Steer Davies Gleave.
APP/E/3	Location Plan showing queue survey locations.
APP/E/4	Street Plan of Fratton Park area and Central Portsmouth.
APP/E/5	Three figures showing increases in traffic flows with a match at Fratton Park.
APP/E/6	Four figures showing queues at the Eastern Road roundabout.
APP/E/7	Three figures showing queues at the Eastern Road/Anchorage Road junction.
APP/E/8	Plan showing proposed transport links for Farlington Parkway.
APP/E/9	Plan showing junctions at which capacity assessments have been carried out.
APP/E/10	Plan - Eastern Road roundabout showing position of through link and associated pedestrian facilities.
APP/E/11	Plan showing Railway Station.
APP/E/12	Plan showing proposed stacked parking at Farlington Parkway.
APP/E/13	Plan showing proposed residents parking zones.
APP/E/14	Plan showing proposed treatment for entry to residents parking zones.
APP/E/15	Plan - Eastern Road roundabout showing position of through link and associated pedestrian facilities (similar to APP/E/10).
APP/E/16	Plan showing Bedhampton - A3 (M) roundabout - Proposed Modification.
APP/E/17	Plan showing Eastern Road/Havant Road - Proposed Modification.
APP/E/18	Plan showing Eastern Road/Fitzherbert Road - Proposed Modification.
APP/E/19	Drawing No 22349/RC/01, P6, agreed highway design for Eastern Road Junction. (Also Document COR/E/1).
APP/E/20	Drawing No 22349/WT/22, Revision P1, showing Eastern Road Interchange - Proposed Modification - Eastbound Merge.

Ref No.	Description/Remarks
APP/E/21	Letter dated 28 August 1992 from Network South East to Mott MacDonald, about possible railway station.
APP/E/22	Letter dated 13 September 1993 from ITT Canon (UK) to Vail Williams About possible use of the Sealectro car park at Walton Road for car parking by Portsmouth FC.
APP/E/23	Letter dated 6 September 1993 from Hampshire Constabulary to Portsmouth Football Club about proposed football ground relocation.
APP/E/24	Letter dated 18 March 1994 from Managing Director of Peoples Provincial buses to Mr Deacon, about bus services.
APP/E/25	Extract showing routes and local services for buses, from the 1994 Bus Routes Map.
APP/E/26	Feasibility Study Report by CEDAC, dated April 1994 into proposed new station between Bedhampton and Cosham.
APP/E/27	Letter dated 20 June 1994 from Peter Field, Director, South West Trains, to Portsmouth Football Club, about proposed Parkway Station.
APP/F/1	Appendix 1 to Proof of Evidence from Rod Sheard detailing Schedule of Stadia incidents.
APP/F/2	Appendix 2 to Proof of Evidence from Rod Sheard setting out the Taylor Report Timescale.
APP/F/3	Appendix 3 to Proof of Evidence from Rod Sheard showing the exits from Fratton Park Football Ground.
APP/F/4	Two appendices detailing aggregate home attendances and highest attendances, submitted by David Deacon.
APP/F/5	Hampshire Fire Brigade Inspection Reports dated 15 February 1990, 12 March 1991, 21 January 1992, 5 January 1993.
APP/F/6	Letter dated 14 January 1991 from the City Planning Officer to SDIP Ltd, enclosing notice of planning permission to build a 3-tier stand.
APP/F/7	Planning Refusal Notice dated 1 July 1991 in respect of proposed 2 tier stand at the Milton End, Fratton Park football ground.
APP/F/8	Letter dated 28 April 1992 from the Planning Inspectorate giving the Inspector's decision to dismiss an appeal for a 2 tier stand at the Milton End, Fratton Park football ground. (Also Document APP/F/13, PIMCO/F/1 and PGC/F/3).
APP/F/9	Portsmouth Football Club Development - Cash Flow Forecasts, dated 31/3/94.

Ref No.	Description/Remarks
APP/F/10	Extract from "The Blue Print for the future of Football" published by the Football Association - June 1991, relating to Conditions of Entry to the Premier League.
APP/F/11	Copy of the Memorandum and Articles of Association of Portsmouth Football Club Ltd (adopted July 1951 and amended 1982).
APP/F/12	Report by City Planning Officer to the Planning Committee - 9 January 1991, on the planning application for the Fratton Stand.
APP/F/13	Appeal Decision, Reference T/APP/K1745/A/91/194.084/P2 dated 28 April 1992 relating to the proposed Milton Stand. (Also Document APP/F/8).
APP/F/14	Plan WF2 showing the extent of built development on the application site.
APP/F/15	Planning Application, and accompanying documents submitted in January 1993 by Hyperion for Fratton Goods Yard development.
APP/F/16	Copy of Refusal Decision Notice dated 26 April 1993 regarding proposed development of Fratton Goods Yard. (Also Document PIMCO/F/3).
APP/F/17	Copy of Market Research undertaken by CNN Marketing for Portsmouth Football Club.
APP/F/18	Plan WF5 showing location of alternative sites considered for the relocation of Portsmouth Football Club.
APP/F/19	Analysis of the alternative sites for the relocation of Portsmouth Football Club.
APP/F/20	Plan showing Hilsea Gas Works Development (now the Blue Print Centre).
APP/F/21	Statement prepared by Wood Frampton regarding Hilsea Gas Works
APP/F/22	Letter dated 14 July 1992 (reference YH 5113/224/4) from the Department of the Environment to Duncan Developments Ltd granting planning permission for new stadium for Dewsbury Rugby League Football Club (together with extract from the Inspector's Report).
APP/F/23	Magazine - "Building for the future" dated Spring 1994, published by the Football League, containing article about progress with new football stadia.
APP/F/24	Letter dated 9 June 1994 from Wood Frampton to Grant Shaw Associates about Fratton Goods Yard.

Ref No.	Description/Remarks
APP/F/25	Letter dated 21 June 1994 from Grant Shaw Associates to Wood Frampton about Fratton Goods Yard.
APP/F/26	Letter dated 24 June 1994 from the Secretary of State for National Heritage to the Chairman of Portsmouth Football Club giving his decision to approve extension of time for provision of an all seater stadium.
APP/F/27	Statement prepared by Wood Frampton regarding feasibility of relocation into Fratton Goods Yard.
APP/G/1	Letter dated 17 February 1994 from the Hampshire County Council Area Estates Manager to Wood Frampton.
APP/G/2	HGP drawing 92/A32/50 showing Tangier Road Playing Field Proposals.
APP/G/3	HGP drawing 92/A32/51 showing Dundas Lane Playing Field Proposals.
APP/G/4	Report by Simon Gidman on the impact of widening Eastern Road on proposed football pitches at Dundas Meadows and on the Great Salterns Golf Course.
APP/G/5	Letter dated 21 June 1994 from Wood Frampton relating to use of Farlington Playing Fields for Cricket Pitches, and drawing no 92.A32.42 showing layout.
<u>LOCAL PLANNING AUTHORITY (PORTSMOUTH CITY COUNCIL) DOCUMENTS</u>	
PCC/A/1	Landscape Plan for Broadmarsh, Havant - 1977.
PCC/A/2	Landscape Plan for Broadmarsh, Havant - 1979.
PCC/A/3	Report - Broadmarsh Coastal Park - June 1989.
PCC/B/1	Plan P showing Nature Conservation Designations in Portsmouth.
PCC/B/2	Plan Q showing Nature Conservation Areas of Portsmouth
PCC/B/3	Letter dated 17 June 1994 from Southern Water Services Ltd to Portsmouth Planning Department about Surface Water Drainage.
PCC/C/1	Table showing estimated impact of loss of trade.
PCC/E/1	Drawing No 9/85/A27/CYCLE/3 prepared by County Surveyor's Department (April 94) showing highway layout at BROADMARSH and A27 roundabout/bridge.
PCC/E/2	Department of Transport Advice Note TA/18/81 published 1981 relating to junction layout for Control by traffic signals.

Ref No.	Description/Remarks
PCC/F/1	Extract from Financial Times dated 12 May 1994 relating to Sale of Naval Dockyards.
PCC/G/1	City Local Plan Topic Paper No 1 - Open Space and Updates.
PCC/G/2	Report dated 9 September 1993 by Head of Leisure Service to the Leisure Committee, about the Football Club Planning Application.
PCC/G/3	Decision of the City of Portsmouth Sports Council - 6 September 1993 about Football Club Relocation.
PCC/G/4	Letter dated 8 September 1993 from Portsmouth Football Club to Councillor Rapson about Relocation Proposals.
PCC/G/5	HGP drawing 92/A32/46 (June 1993) showing Tangier Road Playing Fields Sketch Proposals.
PCC/G/6	Letter dated 17 May 1994 from Hampshire Education Department to Hedley Greentree.
PCC/X/1	Not allocated.
PCC/X/2	Letter dated 4 September 1992 from City Planning Officer to Portsmouth Football Club.
PCC/X/3)
PCC/X/4)
PCC/X/5) Not Allocated
PCC/X/6)
PCC/X/7)
PCC/X/8	Article published in The News on 14 December 1962 entitled "Fireworks with 15 inch shells marked with passing of a racecourse".
PCC/X/9	Article about Farlington Racecourse published in "History in Hiding".
PCC/X/10	Map showing historical information and ownership details (drawing 33/D/94) relating to the Application Site and adjoining land.
<u>Portsmouth Football Club Supporters Club Documents</u>	
PFCS/F/1	Petition/Questionnaire in support of proposed move to Farlington, signed by approximately 400 young people.
DEAN/F/1	List of Football League Grounds attended by Mr Andrew J Dean.

Ref No.	Description/Remarks
	<u>Havant and Fareham Borough Council's Documents</u>
HBC/B/1	Minutes of Havant Borough Council's Planning & Development Committee held on 10 June 1993.
HBC/B/2	Minutes of Havant Borough Council's Planning & Development Committee held on 1 July 1993.
HBC/B/3	Letter dated 27 October 1993 from Havant Borough Council's Head of Development Control to Department of the Environment.
HBC/B/4	Minutes of Havant Borough Council's Planning & Development Committee held on 21 April 1994.
HBC/B/5	Extracts from draft Hampshire County Structure Plan dealing with the Countryside; & Havant Borough Local Plan (Harbours and Nature Conservation).
HBC/C/1	Critique of G L Hearn Preliminary Retail Study - Food Store Scenario.
HBC/C/2	Letter dated 31 March 1994 from Wood Frampton to Hillier Parker about the range of goods for sale.
HBC/C/3	Critique of G L Hearn Preliminary Retail Study - 140,000 sq ft (gross) Non-Food Scenario.
HBC/C/4	Letter dated 10 March 1994 from Hillier Parker to Wood Frampton, and letter dated 11 March 1994 from Havant Borough Council to Wood Frampton seeking clarification on the type and mix of retailing proposed by Portsmouth Football Club.
HBC/C/5	Letter dated 15 March 1994 from Wood Frampton to Fareham Borough Council about retail impact.
HBC/C/6	Letter dated 12 April 1994 from Wood Frampton to Havant Borough Council about retail trade planning conditions (also doc APP/C/18).
HBC/C/7	Not Allocated.
HBC/C/8	Secretary of State for the Environment's Speech to the Town and Country Planning Association in the Hoare Memorial Hall on 17 January 1994.
HBC/C/9	Letter dated 17 May 1994 from Department of the Environment to Denton Hall giving Secretary of State's decisions on Appeals by Marks & Spencer Plc and J Salisbury Plc in respect of development at Hedge End.
HBC/C/10	Plan of Retail Development at Junction 7 (M27) dated September 1993.
HBC/E/1	Plan showing Local Highway Network.
HBC/E/2	5 Year Personal Injury Accident Record at Forty Acre (Bedhampton) Roundabout.

Ref No.	Description/Remarks
HBC/E/3	Plan showing 5 year plot of Personal Injury Accidents at Forty Acres Roundabout.
HBC/E/4	Extract from Road Accidents Great Britain 1992, published August 1993 by HMSO.
HBC/E/5	Map showing Areas within 1 km and 2 km of the application site.
HBC/E/6	Maps showing additional traffic at the Forty Acre Roundabout 1 hour before and 1 hour after football matches.
HBC/E/7	DOT TD 9/93 'Highway Link Design'.
HBC/E/8	Plan of Eastern Road junction annotated with visibility standards and stopping distances.
HBC/E/9	Plan of Eastern Road junction annotated with visibility standards and stopping distances but includes interpretation of TD9/93 para 1.26 assuming junction includes diverge taper.
HBC/E/10	Letter dated 4 May 1994 from County Surveyor to Havant Borough Council about A27 Cyclist Signposting, together with 3 plans.
HBC/E/11	Letter dated 3 June 1994 from the Highways Agency to the Richard Parker Consultancy about TD9/93 - Highway Link Design.
HBC/E/12	Letter dated 22 June 1994 from Havant Borough Council Department of Technical Services relating to Havant Local Plan and improvements to highway infrastructure.
<u>J Sainsbury Plc Documents</u>	
JS/E/1	Summary and Traffic and Highway Report prepared by Mayer Brown Partnership.
JS/E/2	Letter dated 2 June 1993 from Hampshire Constabulary to the City Planning Officer, about traffic implications and traffic management, and letter dated 23 March 1994 from Hampshire Constabulary to Mayer Brown Partnership about traffic management.
JS/E/3	Tables 4.2 and 4.3 from Mott MacDonald's Traffic Impact Report.
JS/E/4	Extract from Traffic Generation: User's guide and review of Studies - page 25, published by the Greater London Council.
JS/E/5	Article about Millwall Football Club Survey published in Parking Review (May 1993).

Ref No.	Description/Remarks
JS/E/6	Sheffield United Turnstile Records.
JS/E/7	Transyt Analysis.
JS/E/8	Assessment of Pedestrian Crossing Facilities.
JS/E/9	Extract from the Sunderland AFC Impact Report.
JS/E/10	Extract from the Southampton AFC Impact Report.
JS/E/11	Letter dated 29 September 1993 from British Rail Property Board to the Inspector conducting the Southampton Football Club Inquiry about Eastleigh Airport Parkway Station.
JS/E/12	Site Location Plan of the Application Site.
JS/E/13	Plan showing off-site parking areas.
JS/E/14	Amended TRANSYT Network Diagram.
JS/E/15	Letter dated 10 May 1994 from Service Planning Manager, South West Trains, to Mayer Brown, about Platform lengths.
JS/E/16	Table showing Portsea Island Rail Trips for a Capacity Game.
JS/E/17	Diagram illustrating Local Rail Services.
JS/E/18	Details of Existing Rail Services provided by South West Trains and Train Capacities.
JS/E/19	Paper setting out Capacity Assessment of Stadium Car Park Access.
<u>Hampshire County Council Documents</u>	
HCC/A/1	Extract from Relevant Policies of the Hampshire County Structure Plan 1993, and the Portsmouth City Local Plan (Deposit) 1992.
HCC/A/2	Map showing suggested Southern Hampshire Green Belt at Farlington - May 1991.
HCC/B/1	Map showing Wildlife Habitats within the vicinity of the proposed stadium.
HCC/B/2	Paper in support of Wildlife and Habitat Issues.
HCC/C/1	Map showing Major Retail Developments in South East Hampshire from November 1981.
HCC/X/1	Report to the County Roads and Development Sub-Committee on 14 June 1993.

Ref No.	Description/Remarks
	<u>English Nature/RSPB/Hampshire Wildlife Trust Documents</u>
ENAT/B/1	Notification of Langstone Harbour SSSI.
ENAT/B/2	Not Allocated
ENAT/B/3	Ramsar Convention on Wetlands of International Importance, dated February 1971.
ENAT/B/4	Details of Loss of Coastal Grazing Marshes in North Langstone Harbour.
ENAT/B/5	Extract from Directory of the North Sea Coastal Margin published by Joint Nature Conservation Committee.
ENAT/B/6	Tables and figures relating to the use of the application site by birds.
ENAT/B/7	Amendments to Tables 11, 12 & 13 Contained in Document ENAT/B/6.
ENAT/B/8	Not Allocated.
ENAT/B/9	Objection by Hampshire Wildlife Trust to Policies T33 & LC6 at the Local Plan Inquiry - 1993.
ENAT/B/10	Report by City Planning Officer to the Planning Committee - 12 January 1994.
ENAT/B/11	Brochure - "Tipner - Taking a Balanced View" - publication by City Planning Officer, dated February 1994.
ENAT/B/12	Figure showing winter peak number of Brent Geese in Langstone Harbour and in the British Wintering Population.
ENAT/B/13	Extract from 'Protecting Internationally Important Bird Sites' published in 1990 by the Nature Conservancy Council.
ENAT/B/14	Extract from 'Important Bird Areas in the United Kingdom' published in 1992 by the RSPB.
	<u>Portsea Island Mutual Co-Operative Society Ltd Documents</u>
PIMCO/C/1	Table showing impact on stores in other Shopping Areas.
PIMCO/E/1	Plan showing 800 metre radius from the application site northern boundary.
PIMCO/F/1	Appeal Decision - Milton End - 28 April 1992. (Also Document APP/F/8).
PIMCO/F/2	City Planning Officer's Report to Committee on Fratton Goods Yard Site - 22 April 1993.
PIMCO/F/3	Refusal Notice dated 26 April 1993 in respect of Fratton Goods Yard Redevelopment Scheme. (Also Document APP/F/16).

Ref No.	Description/Remarks
PIMCO/F/4	Photographs of Farlington Playing Fields Site.
PIMCO/F/5	Photographs of BR Fratton Goods Yard Site.
PIMCO/F/6	Booklet containing Bus Routes and Plan.
PIMCO/F/7	Report dated 18 October 1993 by City Council's Corporate Legal Adviser, City Treasurer and Property Manager on Financial Viability.
PIMCO/F/8	Extract from The News dated 16 October 1993, about land purchase price.
PIMCO/F/9	Table showing Viability Assessment.
PIMCO/F/10	Extract from The Independent showing ground capacities, dated 15 April 1994.
PIMCO/F/11	Three extracts from The News, dated 14/7/93, 13/8/93 and 7/8/93 relating to existing ground and proposed stadium.
PIMCO/F/12	Table showing attendances at Fratton Park - 1990/91 to 1993/94.
PIMCO/F/13	Table showing costs of New Football Stands.
PIMCO/F/14	Table showing Cost of Fratton Park Extension.
PIMCO/F/15	Table showing Cost of Incremental Development at Fratton Park - Phase 1.
PIMCO/F/16	Table showing cost of planned development at Fratton Park - Phase 2.
PIMCO/F/17	Paper issued in October 1993 by the RTPI entitled "Planning and Premiership Football League Clubs".
PIMCO/F/18	Annual Report of the Football Trust (1992-93).
PIMCO/F/19	Paper setting out details on Football Trust Major Projects receiving Grant Aid.
PIMCO/F/20	Football Trust Note on the Major Project (RPBD) Grant Scheme.
PIMCO/F/21	Promotional Material Relating to Barnsley FC new East Grandstand.
	<u>Langstone Harbour Board Documents</u>
LHB/B/1	Map - Langstone Harbour showing extent of Langstone Harbour Board jurisdiction and boundary between Portsmouth and Havant.

Ref No.	Description/Remarks
LHB/B/2	Document entitled A Policy for Langstone Harbour, produced September 1980, by the Langstone Harbour Board Advisory Committee.
LHB/B/3	Langstone Harbour Planning Guidelines, published June 1982, by Portsmouth City Council and Havant Borough Council.
LHB/B/4	5 photographs showing upper reaches of Broom Channel.
LHB/B/5	Conditions suggested by Langstone Harbour Board to be imposed as Conditions on planning permission or as an agreement.
LHB/B/6	Langstone Harbour Board - Scientific and Operational Management Plan, 1977 (2 volumes).
	<u>Cosham Traders' Documents</u>
GT/C/1	Map showing Cosham Shopping Area illustrating empty units, charity shops, and those that have changed hands during last 5 years.
GT/C/2	Tables showing Cosham Shopping Centre percentage drop in receipts and customers.
	<u>Drayton Trader's Association Documents</u>
DTA/C/1	Drayton Traders Association questionnaire and Summary of Replies.
DTA/C/2	Summary of Businesses in Drayton.
	<u>Gauntlett and Hill Trust Documents</u>
GT/C/1	Letter dated 31 March 1994 from Wood Frampton to Bryan Jezeph and Partners about the range of goods for sale.
GT/C/2	Extract from letter dated 22 December 1993 from Department of the Environment giving Secretary of State's decision on the South Hampshire Structure Plan.
GT/C/3	Extract from Havant Borough Local Plan, dated December 1993.
GT/C/4	Extract from Report by Inspector into Portsmouth City Local Plan - December 1993, relating to Shopping Policies.
GT/C/5	Extracts from the Independent dated 21 and 22 April 1994 relating to Superstores.
GT/C/6	Extracts from Hampshire County Structure Plan (Review) - Retailing Trends in Hampshire, published January 1994. (See also COR/C/8).

Ref No.	Description/Remarks
GT/C/7	Location Map showing relationship of the Site to the surrounding area.
GT/C/8	Plan of Waterlooville showing location of the Shopping Precinct.
GT/C/9	Plan of Waterlooville shopping precinct.
GT/C/10	Plan of Dukes Walk shopping precinct.
GT/C/11	Goad Plan of Waterlooville and letter dated 22 June 1994 from Hughes Ellard to Bryan Jezeph and Partners.
<u>Portsmouth Green City Campaign Documents</u>	
PGC/A/1	Copy of Paul Newbold's Proof of Evidence for Public Inquiry held on 17 March 1992 in respect of 2-tier stand at Milton end of Fratton Park Football Ground.
PGC/C/1	Extract from Local Government Policy Making, dated October 1993 - Article about Regional Shopping Centre Development, by Alan Whitehead.
PGC/C/2	Questionnaire on Survey of Shopping Habits and Opinions.
PGC/D/1	Extract from Acoustics and Noise Control Text Book (Reference 3) (Chapter 5).
PGC/D/2	Map of the Drayton and Farlington Area, illustrating areas that would need to have controlled parking.
PGC/E/1	Letter dated 25 April 1994 from Director of Railtrack to Mr D Webb, about railway infrastructure improvements.
PGC/E/2	Letter dated 14 March 1994 from the Planning and Marketing Manager, Network South East, to Mr Cottee.
PGC/E/3	Letter dated 24 June 1993 from Network South East Customer Relations Officer to Mr Roughsedge about proposed station.
PGC/E/4	Map showing Havant Road/Eastern Road junction.
PGC/E/5	Extract from The News dated 21 June 1993 - "Green Carcade brings traffic to a standstill".
PGC/E/6	List of Roads whose link is to Havant Road only, or Havant Road/Eastern Road.
PGC/E/7	Letter dated 28 April 1994 from Railtrack to Portsmouth City Engineer about Bridge No 280, between Bedhampton and Farlington, together with reply dated 21 June 1994 from the City Engineer.

Ref No.	Description/Remarks
PGC/F/1	Extract from 'The News' dated 26 May 1993, relating to Cost of new Sports Complex at Farlington.
PGC/F/2	Extract from 'The News' dated 18/3/93 relating to proposals for redevelopment of Fratton Goods Yard.
PGC/F/3	Letter dated 28 April 1992 (Reference T/APP/K1745/A/91/194084/P2) from Planning Inspectorate giving decision on proposed Milton Stand at Fratton Park. (Also Document APP/F/8).
PGC/F/4	Letter dated 4 June 1993 from Michael Morris ARIBA to Mr R Cottee, together with two drawings showing new stands at Fratton Park incorporating a Section of Fratton Goods Yard.
PGC/F/5	Location Map of suggested alternative site(s) at Forty Acre Farm/Bedhampton Roundabout.
PGC/X/1	Portsmouth City Council Planning and Building Control Handbook published 1993.
PGC/X/2	Constitution of the Portsmouth Green City Campaign. <u>Portsmouth Football Association Documents</u>
PFA/G/1	Loose Minute dated 4 February 1994 about Improvements to Sports Grounds in Portsea Island, prepared by Commander B Wheeler, RN.
PFA/G/2	Letter dated 17 February 1994 from Portsmouth Football Association to Ministry of Defence about Football Pitches.
PFA/G/3	Report - "Threatened" Football Pitches in Portsmouth, prepared January 1994 by A E Greenwood, Honorary General Secretary, Portsmouth Football Association.
	<u>Documents and Plans submitted by Interested Persons</u> <u>Councillor Dr Alan Burnett</u>
ADB/D/1	Results of Questionnaires (including 7 maps) on Amenity Issues reproduced from Thesis by N Brook, BA, Department of Geography, Portsmouth University, 1992.
ADB/D/2	Perceived 'Parking' Externality Field Map of site at Farlington.

Ref No.	Description/Remarks
ADB/D/3	Graphs and bar charts showing population around Fratton Park, and proposed Stadium at Farlington.
ADB/E/1	Table showing car parking spaces available in the area surrounding Fratton Park.
ADB/E/2	Six photographs showing car parking at Fratton Park, Fratton Goods Yard, Haslemere Road, Carisbrooke Road and illegal and dangerous parking.
ADB/F/1	Details of Recent Research on Football Stadia, submitted by Councillor Dr Alan Burnett.
ADB/F/2	Article by Colin Mason and Andrew Moncroft - "The effect of relocation on the Externality fields of Football Stadia: The case of St Johnstone FC, published in Scottish Geographical Magazine, 1993.
	<u>Mrs Kath Kettlewell</u>
KETT/F/1	Fixed Penalty parking ticket issued on 18 December 1993 against Mrs K Kettlewell.
	<u>Mr D J Hewlett</u>
DJH/C/1	Paper prepared by Mr D J Hewlett giving details of Superstore Type food/Non food Retail Premises in vicinity of the A27/M27/A3 (Hedge End to Chichester and North to Petersfield).
	<u>Mr D Webb</u>
WEBB/X/1	List of Names and Addresses in Auriol Drive opposed to Planning Application and authorising Mr D Webb to speak on their behalf.
	<u>Mr C Davis</u>
DAVIS/E/1	Letter dated 25 April 1994 from Reverend John Pinder, Rector of Farlington.
DAVIS/E/2	Copy of Milton Messenger published by Milton Labour Party - Autumn 1993 - containing an article about parking problems in Milton.
	<u>Mr M Giles</u>
GILES/B/1	Extract from the 1930 Ordnance Survey Map for Farlington Area.
GILES/B/2	Extract from Local Street Map showing the Farlington Area.
GILES/B/3	Portsmouth Water Company Map showing Old Farlington Waterworks.

Ref No.	Description/Remarks
GILES/B/4	Photograph: Spring
GILES/B/5	Photograph: Spring Water Cygnet Road
GILES/B/6	Photograph: Sedement & Vegetation (Marshes)
GILES/B/7	Photograph: Erosion (Marshes)
GILES/B/8	Photograph: Erosion
GILES/B/9	Extract from "Rivers" by Geoffrey Petts
GILES/B/10	Photograph: Reed lined Water Course
GILES/B/11	Extract from "Rivers" - Sources and Methods in Geography by Geoffrey Petts
GILES/B/12	Extract from "Soil Management" by Bryan Davies
GILES/B/13	Photograph: Channel at Hinge Flap Gate
GILES/B/14	Photograph: Hinge Flap Gate
GILES/B/15	Rain Fall Data - Portsmouth Water Company Site
GILES/D/1	Photograph: Farlington Playing Fields
GILES/D/2	Photograph: Peters Pond
GILES/D/3	Photograph: St Johns Relocation Site
GILES/D/4	Photograph: St Johns Relocation Site
	<u>Mr P B Hollamby</u>
PBH/C/1	Trading and Profit and Loss Account in respect of "Hollies", Drayton.
	<u>Mr G Joly</u>
JOLY/B/1	Two leaflets published by Portsmouth Water Company Plc referring to Havant and Bedhampton Springs.
JOLY/D/1	Photograph showing the Parkway site seen from Portsdown Hill, and photograph showing the playing fields as they are today.
	<u>Mr A P Fish</u>
FISH/X/1	Various newspaper articles extracted from 'The News' during 1993 and 1994 relating to existing and proposed stadium.
FISH/X/2	Articles published in The News on 2/10/92, 5/10/92, 27/4/93 and 15/4/94, and the Independent on 18/4/94.
FISH/X/3	Articles published in The News on 2/8/93, 4/5/94, 8/9/93, 11/9/93, 28/7/93.

Ref No.	Description/Remarks
FISH/X/4	Correspondence between Parks and Recreation Department and Mrs J Hood - 25/9/92, 21/1/93 and 4/2/93, and Mr & Mrs Fish - 9/12/92, together with extracts from the News relating to allotments.
FISH/X/5	Letter dated 20 May 1994 from National Rivers Authority to Mr A Fish about Licensed Abstraction and Observation Boreholes at Drayton. <u>Mr R Masterton</u>
RM/E/1	Drawing showing Kinross Crescent illustrating parking arrangements for residents. <u>Mr J C Ottewell</u>
JCO/F/1	Conservative Party's proposals for redevelopment of Fratton Goods Yard. <u>Mr B J Head</u>
BJH/F/1	Extract from the News dated 19 October 1993 relating to the proposed sale price of land at Farlington. <u>Councillor B Maine</u>
MAINE/F/1	Letter dated 19 May 1994 from Councillor Maine to the City Manager, and reply dated 23 May from the Head of Resources relating to negotiations for disposal of the land at Farlington. <u>Mrs S J Ottewell</u>
SJO/X/1	Letter dated 6 June 1994 from Mrs S J Ottewell to the City Manager.
SJO/X/2	Letter dated 15 June 1994 from City Manager to Mrs Ottewell.
SJO/X/3	City Council Customer Focus Statement on Planning Pledges.
SJO/X/4	Directors Report and Accounts for Portsmouth Football Club Ltd for year ended 31 May 1993.
SJO/X/5	Directors Report and Accounts for Blue Star Garages Ltd for year ended 31 October 1992.
SJO/X/6	Directors Reports and Accounts for Alton House Ltd for year ended 31 October 1992. <u>Mrs Kay Boshier</u>
KB/E/1	Article relating to Supermarket fires published in New Builder - February 1994.

Ref No.	Description/Remarks
PILE/F/1	<p><u>Mr A Pile</u></p> <p>Sale Particulars issued by Austin Adams/Knight Frank Rutley for disposal of Land owned by Blue Star Estates at London Road, Waterloooville, together with Photograph of the Site.</p>
KR/E/1	<p><u>Mr K Roughsedge</u></p> <p>Letter dated 11 June 1993 from Hampshire Constabulary to Mr K Roughsedge.</p>
KR/F/1	<p>Letter dated 15 October 1993 from City Council Corporate Legal Advisor to Mr Roughsedge on valuation and financial matters.</p>
KR/X/1	<p>Letter dated 26 November 1993 from The News Deputy Editor to Mr K Roughsedge.</p>
KR/X/2	<p>Letter dated 31 May 1994 from the Curator of Manchester United Football Club Museum to Mr Roughsedge.</p>
CROSS/E/1	<p><u>Mr J M Cross</u></p> <p>3 Photographs showing parking conditions in Grove Road, Drayton.</p> <p style="text-align: center;">_____ " _____</p>