



**SUMMARY for
Heritage Proof of Evidence:**

**Edwina Mountbatten House Broadwater Road
Romsey Hampshire SO51 8GH**

Appeal by Churchill Retirement Living

**Planning Application: 23/01700/FULLS
PINS: APP/C1760/W/24/3342514**

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1. Introduction

1.1 Background

1.1.1 My name is Paul White. I am a company director and Practice Area Lead for the Historic Environment at Ecus Ltd. I graduated with a Bachelor of the Arts (Special Honours) degree in Archaeology from the University of York in 1995, and a Masters of Philosophy in Geographic Information Systems and Remote Sensing from the University of Cambridge in 1999. My experience is set out in my main proof of evidence.

1.1.2 I can confirm that the evidence which I have prepared and provide for this appeal (reference number APP/C1760/W/24/3342514) is true and has been prepared and is given in accordance with the guidance of my professional institution and I confirm that the opinions expressed are my true and professional opinions.

1.1.3 This summary is for the main proof of evidence dealing with heritage issues. The main proof provides in Section 3 a detailed analysis of the heritage significance of the designated heritage assets that are claimed by the Council's heritage witness to be harmed by the appeal scheme. This includes analysis of the contribution the setting of assets makes to their heritage significance and what, if any, contribution the appeal site makes to the setting and heritage significance.

1.1.4 Section 4 of my main proof of evidence then details how the appeal scheme has been designed to avoid harm and how the role of the appeal site, as built, will contribute to the setting of the designated heritage assets and whether this will lead to harm.

1.2 Statement of Involvement and Scheme Development

1.2.1 I have been involved with the design of the scheme from the outset since October 2022 and have advised the appellant on heritage constraints and how the design can respond to these constraints. I can confirm that consideration of the historic

environment around the Appeal Site has been at the forefront of the design of the appeal scheme and has ensured that there is no harm to the heritage significance of designated heritage assets.

- 1.2.2 This was achieved through assisting the design team to identify characteristics of the townscape and historic environment that would ensure the appeal scheme sits harmoniously into the streetscape. Examples include designing the scheme so that it read as a continuous terrace of housing of varying heights, how the building responds to the corners of the site, the use of articulation of gables, the height of the building onto Palmerston Road avoiding full three storey height, use of accommodation in roof and dormers and how the footprint responds to the road.
- 1.2.3 Furthermore, I was involved in discussing the scheme with the planning officer and conservation officer in September 2023 following initial consultation on the planning application. The Conservation Officer raised initial concerns on the proposals and following a walkover survey of the site and surrounding conservation area and heritage assets it became clear that some of the concerns were based on not fully appreciating the character and appearance of this part of the town and how the scheme had responded to its surroundings. Suggestions were made by the Conservation Officer and taken onboard that concerned fenestration and elevational treatment along Palmerston Street, treatment of gable ends and making more of a feature to the southeast corner of the appeal scheme.
- 1.2.4 This resulted in revisions to the appeal scheme and following the amendments to the design of the appeal scheme the Conservation Officer considered that the changes had sufficiently overcome the concerns previously raised.
- 1.2.5 At paragraph 8.20 of the Officer's Report (OR) to the planning committee it was considered that the approach proposed, informed by the comments of the Conservation Officer, and reflected in the revised proposals, was "*appropriate*

and would broadly **enhance** the character of this site situated adjacent to the Conservation Area and make a **positive** contribution to sustaining the significance of the surrounding heritage assets". The revised designs had taken account of the character, appearance and setting of heritage assets and those assets had informed the design of the proposals.

1.3 Scope of Evidence

1.3.1 This evidence is submitted on behalf of Churchill Retirement Living Ltd (the Appellant) in support of its appeal against the refusal of a planning application (23/01700/FULLS) by Test Valley Borough Council (the Council) in March 2024 for the redevelopment for retirement living accommodation comprising 47 retirement apartments including communal facilities, access, car parking and landscaping.

1.3.2 My evidence relates to Reason for Refusal #1 which states:

By virtue of the scale, bulk and design of the proposal the development would be detrimental to the special architectural and historic importance of the setting of the Romsey Conservation Area and the setting of heritage assets. This harm is compounded further when the proposal is viewed from the roundabout junction of the A27 and Palmerston Street. It is acknowledged that the development would result in less than substantial harm to the significance of these designated heritage assets and the conservation area. However, the public benefits arising from the development would not outweigh this real and identified harm. As such, the proposal is considered to be contrary to Policies E1 and E9 of the Test Valley Borough Revised Local Plan (2016).

1.3.3 As the Appeal Site is located outwith the Romsey Conservation Area, section 72 (1) of the TCP (LB&CA) Act 1990 is not engaged although consideration to the heritage significance of the conservation area is required through planning policy and national planning guidance.

1.3.4 With regards to RfR1 it is important to note that, as clearly set out by Historic England within their guidance (CD 4.12, para 9):

“Setting is not itself a heritage asset, nor a heritage designation, although land comprising a setting may itself be designated (see below Designed settings). Its importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance.”

1.3.5 As such setting itself cannot be harmed but consideration to how changes within the setting of a designated heritage assets results in harm to their heritage significance (and the reason for their designation) is what is required to be considered.

1.3.6 Neither the Reason for Refusal or the Council’s Statement of Case identified the listed buildings alleged to be harmed.

1.3.7 The High Court has ruled that within the NPPF there are three categories of harm that are recognised: substantial harm, less than substantial harm and no harm¹. Even so, when establishing harm to heritage assets, the Planning Policy Guidance is very clear that ‘within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated’².

1.3.8 Although less than substantial harm was identified in RfR1, the actual extent of harm within this threshold had not been identified in neither the RfR1 or the Council’s SoC. In addition neither document identifying which designated heritage assets were harmed.

1.3.9 At the CMC on the 10 June 2024 the appellant requested the listed buildings to be identified along with the extent of harm within the less than substantial harm category. On the 28 June 2024 an extensive list of designated heritage assets

¹ The Queen on the application of James Hall and Company Limited v City of Bradford Metropolitan District Council v Co-Operative Group Limited, Dalehead Properties Limited [2019] EWHC 2899 (Admin), 2019 WL 05864885, para34.

² NPPG Historic Guidance Paragraph 018 reference ID 18a-018-20190723

which the Council's heritage witness considers to be subject to less than substantial harm was provided to the appeal in the document 'Impact on Heritage Assets, June 2024'. The Council's heritage witness did not state where the extent of harm sits within the less than substantial harm category. These are listed in Table 1 below.

1.3.10 To assist the Inspector, the listed buildings are listed geographically broadly north to south and those marked with an asterisk were considered as part of the heritage statement submitted with the planning application as those that would have the potential to be impacted by the appeal scheme and taken forward for detailed assessment. Their locations are illustrated in Figure 1 and in Appendix 1 of my main proof.

1.3.11 The list of heritage assets identified by the Council's heritage witness now includes Broadlands Registered Park and Garden (RPG) which according to him has a 'low level of less than substantial harm'.

1.3.12 Subsequently, following the exchange of the 'Impact of Heritage Assets' document, correspondence from the Council's Heritage Witness on the 16th July 2024 to myself stated "*Having further scrutinised the Appeal proposal and its relationship to the nearby listed buildings, aided by a second review of the assets and their settings on site, I have concluded that the Appeal Proposals would not cause harm to the buildings of Fox Mill: 23a and 23b Palmerston Street, and 64 Palmerston Street.*"

Table 1: List of heritage assets identified by the Council's Witness

Address (all Palmerston Street unless otherwise noted)	Listing Grade	Alleged Degree of Harm to Heritage Asset
Romsey Conservation Area	n/a	Less than Substantial
51-55 The Hundred	II	Less than Substantial
1Palmerston Street	II	Less than Substantial
3-7 Palmerston Street	II	Less than Substantial
4 Palmerston Street	II	Less than Substantial
6-18 Palmerston Street	II	Less than Substantial
Park House, 9 Palmerston Street	II	Less than Substantial
11-17 Palmerston Street	II	Less than Substantial
* 20-28 Palmerston Street	II	Less than Substantial
* Manor House, 19-21 Palmerson Street	II	Less than Substantial
* 30-36 Palmerston Street	II	Less than Substantial
* 38-52 Palmerston Street	II	Less than Substantial
* 23a & 23b Palmerston Street	II	Less than Substantial (Subsequently changed to no harm on 16/07/24)
* Mill Cottage (64 Palmerston Street (wrongly attributed to Foxmills, Mill House and 62 by TVBC)	II	Less than Substantial (Subsequently changed to no harm on 16/07/24)
* Red Lodge, Broadlands Park	II	Less than Substantial
Broadlands RPG	II*	Low level of less than substantial harm

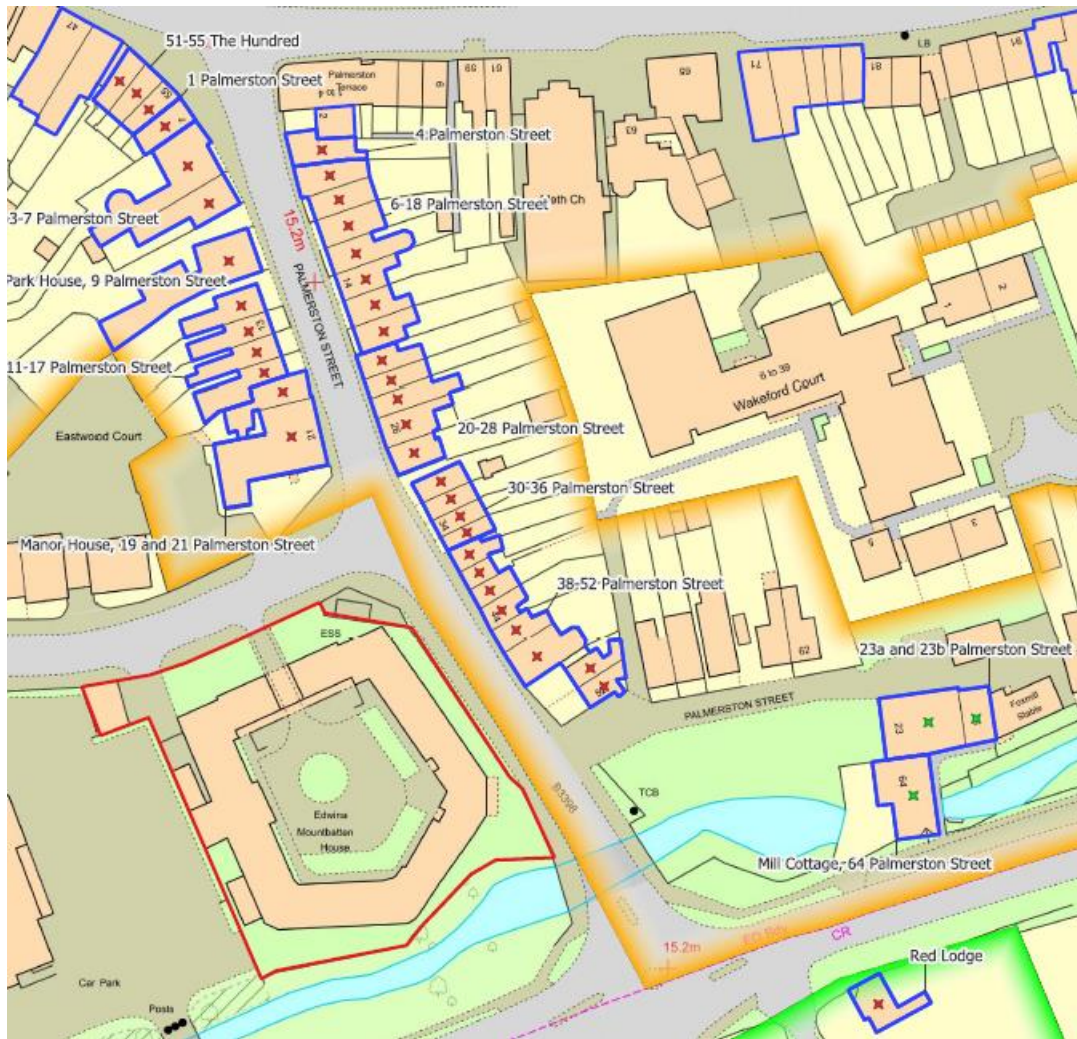


Figure 1: Designated Heritage Assets

1.3.13 It is my professional opinion that the scheme would not result in harm to the character and appearance of the Romsey Conservation Area, to the heritage significance of the nearby listed buildings or to Broadlands RPG. In contrast it is considered by the Council' heritage witness that there would be less than substantial harm to the conservation area, Broadlands RPG and numerous listed buildings. As such NPPF 208 is engaged.

1.3.14 If the Inspector is minded to consider that there is less than substantial harm to one or more of the designated heritage assets, then in accordance with NPPF 208 that harm should be weighed against the public benefits of the proposal. The public benefits of the proposal are identified in Mr. Shellum's planning evidence, and he considers the paragraph 208 balancing exercise.

2. Summary of Assessment

2.1 Introduction

2.1.1 Section 3 of my main proof of evidence provides a detailed assessment of heritage significance of the designated heritage assets that have been identified by the Council's heritage witness that are alleged to result in harm . This includes a review of heritage significance of each heritage asset, consideration of its setting and the contribution the appeal sites makes to setting and therefore heritage significance.

2.1.2 In summary, the contribution the appeal site I consider makes to the heritage significance within the settings of the designated heritage assets, as identified by the Council's heritage witness, is out in Table 2, below.

Table 2: Contribution of the Appeal Site to heritage significance within the setting of designated heritage assets

Heritage Asset	Contribution of the Appeal Site to heritage significance within the setting of designated heritage assets
Romsey Conservation Area	Neutral/ detracting
51-55 The Hundred	None
1 Palmerston Street	None
3-7 Palmerston Street	None
4 Palmerston Street	None
6-18 Palmerston Street	None
Park House, 9 Palmerston Street	None
11-17 Palmerston Street	None
20-28 Palmerston Street	Neutral/ none
Manor House, 19-21 Palmerston Street	Neutral
30-36 Palmerston Street	Neutral
38-52 Palmerston Street	Neutral

Heritage Asset	Contribution of the Appeal Site to heritage significance within the setting of designated heritage assets
23a & 23b Palmerston Street	None
Mill Cottage 64 Palmerston Street	None
Red Lodge, Broadlands Park	None
Broadlands RPG	None

3. Analysis of the Appeal Scheme and Reason for Refusal No.1

3.1 The Role of the Current Appeal Site on Heritage Significance

3.1.1 The design of the appeal scheme is detailed in Mr Jackson's evidence, whilst my evidence considers the appeal scheme regarding the historic environment. Within Section 4 of my main proof

3.1.2 The RfR states that the appeal scheme would lead to less than substantial harm by virtue of its scale, bulk and design of the proposal. The RfR1 states "*The development would be detrimental to the special architectural and historic importance of the setting of the Romsey Conservation Area....*". I do not consider the location in which the appeal site is located has any special architectural and historic importance to the conservation area.

3.1.3 As noted in Section 3 of my main proof, the appeal site either makes a neutral or no meaningful contribution to the heritage significance of the surrounding designated heritage assets. The appeal site in its current character and appearance as a derelict building with deteriorating public realm detracts from the Romsey Conservation Area. If the baseline condition continues in its deteriorating trajectory, then this would over time become increasingly detrimental to the setting and heritage significance of the adjacent listed buildings.

3.2 The Appeal Scheme

Assessment of the Appeal Scheme

3.2.1 The redevelopment would be residential in scale designed as a series of different building forms presented as a continuous terrace of buildings. This is in keeping with the residential character of Palmerston Street and would introduce positive public realm into a space currently vacant and inactive.

3.2.2 The footprint has been designed to introduce continuous frontages along

Palmerston Street and Broadwater Road reflecting the characteristics of built form in the area. The redevelopment would contribute to funnelling views along the streetscape into/from the town and the sense of enclosure afforded along the streetscape of Palmerston Street towards the conservation area.

3.2.3 The appeal scheme also reflects characteristics already present within the town, with buildings with larger footprints present in the immediate vicinity of the appeal site and which already comprise the setting of the conservation area and listed buildings. Funnelled enclosed views are a characteristic of the conservation area, created due to the undulating character of the streets and the presence of strong built form lining the roadside.

3.2.4 I consider the appeal site to have the capacity to accommodate the redevelopment proposed and through its footprint and design, as a terrace of individual units, avoids the introduction of a singular building of perceivable scale and mass that extends across the entirety of the Site.

3.2.5 The building has been designed to respect the character of the streetscape through its elevational design and its roofscape. The appeal scheme will have a staggered roof height with the elevation along Palmerston Street varying between 2-2.5 storeys in height. The number of storeys is considered appropriate and reflects the number of storeys present along Palmerston Street which enables the proposed development to blend in with the existing and historic mass and scale. Whilst the redevelopment would appear in views from the south along Palmerston Street, through its design and sympathetic proposed materials it will appear as a series of terrace units thus reflecting the characteristics of built form within Romsey.

3.2.6 The appearance of the proposed redevelopment in such views would not negatively impact upon the ability to understand and experience the streetscape and approach into the historic core. The majority of proposed built form along

Palmerston Street will comprise of two floors with some accommodation within the roof. The number of dormers are limited and their design reflects those extant along the streetscape.

3.2.7 The elevations along Broadwater Road and Bypass Road will comprise 3 storey elements. This is not considered inappropriate within the context of the existing townscape, with the existence of similar height buildings and within the setting of the designated heritage assets. By designing a building of varying number of storeys, the proposed scale and mass reflects the variances in the existing surrounding built environment. As such the appeal scheme would not negatively impact upon the historic environment.

3.2.8 The design of the redevelopment takes inspiration from the surrounding townscape both in terms of design and materials which complement the streetscape as well as reinforcing our understanding, appreciation, and experience of the historic development of the town. The redevelopment would introduce a building which is sympathetic, appropriate and of visual interest. It achieves this through combining elements of the historic environment and showcasing them in a modern architectural way. For instance,

1. the design takes inspiration from the terraced buildings located along Palmerston Street and appears as a series of units reflecting this;
2. the roof design is in keeping with the characteristics of those along the streetscape and within the wider townscape broken by changing heights of buildings;
3. the design of the dormers reflects those already extant along Palmerston Street; and
4. Reference to the design of gable ends with the conservation area.

3.2.9 The proposed materials include the combined use of red brick and white-painted

brick with roof materials comprising natural slate roofs and red roof tiles. Chimneys are present along the roofscape. Architectural detailing includes matching window heads and cills. These chosen materials, detailing and designs reflect the surrounding townscape and add interest to the elevational treatment of the building making it appear as a series of separate units with strong vertical rhythm and simple variation rather than one uniform building. The materials and colour palate reflect that which is already present within Romsey and on the streetscape of Palmerston Street and Broadwater Road.

3.2.10 Within Section 4.3 of my main proof I consider in detail the role of the appeal scheme will have on the heritage significance of each of the designated heritage assets that the Council’s heritage witness alleges to receive harm to their heritage significance.

3.2.11 The difference between the parties for the alleged harm to the heritage significance to the designated heritage assets is set out in Table 3, below.

Table 3: Comparative table of alleged harm to heritage significance

Heritage Asset	Alleged Harm by the Proposed Development to Heritage Significance			
	Appellant	Conservation Officer	Officer’s Report	Council’s Heritage Witness
Romsey Conservation Area	No harm	No harm	Positive	Less than substantial harm
51-55 The Hundred	No harm	N/A	N/A	Less than substantial harm
1 Palmerston Street	No harm	N/A	N/A	Less than substantial harm
3-7 Palmerston Street	No harm	N/A	N/A	Less than substantial harm
4 Palmerston Street	No harm	N/A	N/A	Less than substantial harm

Heritage Asset	Alleged Harm by the Proposed Development to Heritage Significance			
	Appellant	Conservation Officer	Officer's Report	Council's Heritage Witness
6-18 Palmerston Street	No harm	N/A	N/A	Less than substantial harm
Park House, 9 Palmerston Street	No harm	N/A	N/A	Less than substantial harm
11-17 Palmerston Street	No harm	N/A	N/A	Less than substantial harm
20-28 Palmerston Street	No harm	N/A	N/A	Less than substantial harm
Manor House, 19-21 Palmerston Street	No harm	No harm	No harm	Less than substantial harm
30-36 Palmerston Street	No harm	No harm	No harm	Less than substantial harm
38-52 Palmerston Street	No harm	No harm	No harm	Less than substantial harm
23a & 23b Palmerston Street	No harm	No harm	No harm	No harm
Mill Cottage, 64 Palmerston Street	No harm	No harm	No harm	No harm
Red Lodge, Broadlands Park	No harm	No harm	No harm	Less than substantial harm
Broadlands RPG	No harm	No harm	No harm	Lower end of less than substantial harm

3.2.12 As set out in Table 3, my assessment of the appeal scheme accords with the opinions of the professional heritage expert of the Council's Conservation Officer

and with the findings of the Planning Officer, which is in contrast to the Council's heritage witness who states less than substantial harm. On receipt of the Council's heritage witness evidence it is hoped that the extent of harm within the less than substantial harm category will be expressed and Table 3 can be updated accordingly.

3.2.13 I do not share the opinion of the Council's heritage witness that the scheme would result in less than substantial harm to numerous designated heritage assets as set out in my evidence and therefore, my view is that para 208 of the NPPF is not engaged. If, contrary to my view, the Inspector is minded to conclude that the proposal would result in less than substantial harm to one or more of the designated heritage assets, then, in line with para 208 of the NPPF, the Inspector will need to weigh that harm against the public benefits of the appeal scheme which are set out within Mr. Shellum's evidence.

4. Conclusion

4.1 Summary

- 4.1.1 It is my professional opinion that the appeal site can accommodate the proposed scheme without resulting in harm to the heritage significance of the conservation area or listed buildings due to changes within their setting.
- 4.1.2 The Site currently comprises a vacant building of no visual interest and poor public realm. It is not considered to be of heritage interest and its removal is not considered a constraint in heritage terms. The removal of the existing building within the appeal site presents the opportunity for regeneration and to introduce a building which will have a positive benefit to the streetscape.
- 4.1.3 As the appeal site is located within an area of varying architectural design, materials and scale, a building of its own design, which embraces aspects of the built environment and incorporates them into its design, is appropriate. The introduction of such a building will not result in harm to the heritage significance of designated heritage assets.
- 4.1.4 The proposals present a change, such change would not diminish our understanding of the historic environment, those key elements which contribute to it, or ability to appreciate and experience it. The appeal scheme will preserve the setting of listed buildings and therefore the statutory obligations under section 66 of the LBCA Act 1990 are also achieved.