

TOWN AND COUNTRY PLANNING ACT 1990

APPEAL BY CHURCHILL RETIREMENT LIVING LTD AGAINST TEST VALLEY BOROUGH COUNCIL'S REFUSAL OF AN APPLICATION FOR REDEVELOPMENT TO FORM 47 RETIREMENT LIVING APARTMENTS FOR OLDER PERSONS WITH ASSOCIATED COMMUNAL FACILITIES, PARKING AND LANDSCAPING.

SITE AT: EDWINA MOUNTBATTEN HOUSE, BROADWATER ROAD, ROMSEY, SO51 8GH

LPA REF: 23/01700/FULLS

PLANNING INSPECTORATE REF: APP/C1760/W/24/3342514

PLANNING INQUIRY DATE: 13-16 & 20 AUGUST 2024

PROOF OF EVIDENCE: DESIGN

Rob Burns, BA, MCD

On behalf of Test Valley Borough Council

July 2024

1. QUALIFICATIONS and EXPERIENCE

- 1.1.1 My name is Rob Burns, and I am the Director of Place & Context, an independent consultancy working in the urban design and historic built environment sectors. I am a professional consultant with qualifications in Archaeology and Urban Design, and have over 40 years experience of working in the sector. Although I now run an independent consultancy dealing with urban design and heritage aspects of development, guidance and management, I was formerly a Historic Areas Inspector for Historic England, and manager of a team of heritage and design staff in local government. I am a long standing member of the North West Regional Places Matter Design Review Panel, and formerly a CABE Enabler.
- 1.1.2 I have considerable experience in respect of the analysis and assessment of heritage impacts arising out of development proposals, and in the preparation of frameworks, masterplans and development schemes which take account of heritage assets, and the need to retain distinctive and contextually relevant townscapes. This includes working on large scale masterplans and individual new build projects in an urban context, whilst acknowledging and respecting sensitive heritage assets, and using the historic built environment to inform proposals.
- 1.1.3 Of particular relevance to these proposals is the development of frameworks and masterplans for the Canal Quarter in Lancaster, working alongside others to address the heritage issues relating to the Liverpool 1 retail development and the development of Liverpool's waterfront with a new arena, office and housing schemes and a museum in what was then a World Heritage Site, in addition to being a conservation area with a series of highly graded listed buildings. I have also produced design and heritage statements and assessments for development schemes in both rural and urban areas, with schemes relating to tall buildings in sensitive historic areas through to the re-purposing of listed buildings. I have also acted as a design witness in a number of Public Inquiries and Informal Hearings.
- 1.1.4 I was approached by Test Valley Borough Council at the beginning of July 2024, and asked if I would be willing to act as a design witness in support of the Council at the Public Inquiry. Following the examination of the supporting information, including details of the appeal scheme, and a site visit, I confirmed that I would be content to take on that role.
- 1.1.5 This evidence is based on my analysis of the proposals in the context of the Romsey conservation area and the existing urban grain and character of the town.

2. INTRODUCTION

2.1.1 This Proof of Evidence has been prepared on behalf of Test Valley Borough Council for the refusal of planning permission 23/01700/FULLS.

2.1.2 The proposals are described as:

- Redevelopment for retirement living accommodation comprising 47 retirement apartments including communal facilities, access, car parking and landscaping.

2.1.3 The site is located to the south of the Romsey conservation area, having been removed from within its boundary following a reassessment in 2020, but is located within the setting of the conservation area. Similarly, there are no listed buildings within the site, but a number on close proximity, including 19-21 Palmerston Street (the Old Manor House), 11-17 Palmerston Street, 9 Palmerston Street, 3-7 Palmerston Street, 1 Palmerston Street, 38-52 Palmerston Street, 30-36 Palmerston Street, 20-28 Palmerston Street, 6-18 Palmerston Street, 4 Palmerston Street and 51-55 The Hundred. As with the conservation area, the proposal has the potential to impact on the setting of these designated assets. These collectively help to inform the background townscape and context within which the development is proposed.

2.1.4 In the decision notice, reasons 1 and 2 are of particular relevance to this proof of evidence, and state that:

1. 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).
2. The proposed development by virtue of the size, scale, mass, and proximity to dwellings on Palmerston Street will result in a sense of enclosure and overbearing impact on 38-48 Palmerston Street & 30-36 Palmerston Street to the detriment of the residential amenities of these dwellings, contrary to policy LHW4 of the Test Valley Borough Revised Local Plan (2016).

2.2 Scope of Evidence

2.2.1 This proof of evidence on design matters forms part of a number of individual proofs as part of the Council's case and should be read in conjunction with these. My assessment will address the urban design and architectural merits of the appeal proposal, including but not limited to: design, height, massing, and impact on existing and emerging local context, as described in the relevant Reasons for Refusal. Other witnesses address heritage and the overall planning balance. I defer to their evidence on those matters

2.2.2 The proof is informed by the national and local policies contained in the National Planning Policy Framework 2023, and the Test Valleys Borough Revised Local Plan (2016) (CD3.1). Other relevant documents are the South of Romford Town Centre Masterplan report (2020) (CD4.8), the Romsey Town Design Statement (2008) (CD4.9) and the Romsey Conservation Area Appraisal (2020) (CD4.10). The National Design Guide (2021) (CD4.16), the Model National Design Code (2021) (CD4.17) and Manual for Streets (2007) (CD4.13) have also been referred to. National guidance on heritage issues is provided by Historic England, and the good practice advice notes of The Setting of Heritage Assets (2017) (CD4.12) is also of particular relevance. Whilst heritage issues are the subject of Mr Wright's evidence, this design proof will also refer to relevant advice contained in the HE document on setting.

2.2.1 I have read the Committee Reports and consultation responses for the application, and the response sent in by the Design Review Panel, dated 07 August 2023. I have also read the submitted information which accompanied the planning application.

2.2.2 In summary, my evidence will illustrate that:

- The proposal does not conform to national or local guidance in relation to design
- Fails to meet the policies within the Local Plan
- Whilst the heritage issues of the proposals are examined in the proof of evidence of Mr Wright, the scheme fails to preserve and enhance the Town Centre conservation area which it adjoins.

3. RELEVANT PLANNING POLICY, LEGISLATION AND GUIDANCE

3.1 National Planning Policy Framework

- 3.1.1 Government Policy set out in the NPPF places a strong emphasis on good design as a key element in effective place-making, which will contribute to the creation and continuation of sustainable communities.
- 3.1.2 Section 12 'Achieving Well-Designed and Beautiful Places' of the NPPF discusses the importance and value of good design. Paragraph 131 explains that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve and that good design is a key aspect of sustainable development.
- 3.1.3 Paragraphs 131 – 132 recognise that design policies should be developed with local communities so that they reflect local aspirations and are grounded in an understanding and evaluation of each area's defining characteristics. The Government encourages the use of supplementary planning documents to provide a framework for creating distinctive places with a consistent and high quality standard of design.
- 3.1.4 Paragraphs 133 and 134 deal with the need to prepare design guides or codes, which align with the National Design Guide and National Model Design Code.
- 3.1.4 Paragraph 135 explains that both planning policies and decisions should ensure that developments:
- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
 - b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
 - c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
 - d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
 - e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

3.1.5 Paragraph 139 explains that permission should be refused for development of poor design, taking account of local design standards and guides, or national guidance on design.

3.2 National Design Guide (NDG) 2021

3.2.1 The purpose of the guide is to illustrate “how well-designed places that are beautiful, enduring and successful can be achieved in practice”.

3.2.2 The guide sets out ten characteristics of well-designed places and expands on how these are to be achieved in practice, including providing good practice case studies for each of the ten characteristics.

3.2.3 The characteristics of most relevance to this appeal are those of *Context*, *Identity*, and *Built Form*, and the appraisal section of this proof includes consideration under these headings.

3.2.4 The NDG also states that LPA’s should have regard to the recommendations made by design review panels.

3.2.5 In relation to context, well designed places are described as:

- *based on a sound understanding of the features of the site and the surrounding context, using baseline studies as a starting point for design;*
- *integrated into their surroundings so they relate well to them;*
- *influenced by and influence their context positively; and*
- *responsive to local history, culture and heritage.*

The guidance calls for new buildings to respond positively to the features of the site itself and the surrounding context beyond the site boundary. This includes:

- *the existing build development, including layout, form, scale, appearance, details and materials;*
- *patterns of built form, including local precedents for routes and spaces and the built form around them, to inform the layout, grain, form and scale;*
- *the architecture prevalent in the area that contribute to local character, to inform the form, scale, appearance, details and materials of new development;*
- *the history and heritage of the site, its surroundings and the wider area, including cultural influences;*

- *the significance and setting of heritage assets and any other specific features that merit conserving and enhancing;*
- *the local vernacular, including historical building typologies such as the terrace, town house, mews, villa or mansion block, the treatment of facades, characteristic materials and details*

3.2.6 Identity, or character, of a place comes from the way that buildings, streets, spaces and landscape interact, and create distinctive places. Well designed developments should respond to the local character and identity, and should be influenced by:

- *an appreciation and understanding of vernacular, local or regional character, including existing built form, landscape and local architectural precedents;*
- *the characteristics of the existing built form;*
- *the elements of a place or local places that make it distinctive; and*
- *other features of the context that are particular to the area*
- *the height, scale, massing and relationship between buildings*
- *roofscapes*
- *the scale and proportion of buildings, façade design such as the degree of symmetry, variety, the pattern and proportion of window, doors and their details*

3.2.7 Built form relates to the three-dimensional pattern or arrangement of development blocks, streets, buildings and open spaces, and their interrelationship. The built form of well-designed places relates well to:

- *the site, its context and the opportunities they present;*
- *the proposed identity and character for the development in the wider place.*

Built form defines a pattern of streets and development blocks, and street types depend on:

- *their width relating to their use;*
- *the height of buildings and the consistency of their building line in relation to the street itself, and the sense of enclosure that gives;*
- *how built up they are along their length, and the structure of blocks and routes that this creates;*
- *establishing an appropriate relationship with the pattern, sizes and proportions of existing streets in the local area*

3.3 National Model Design Code (2021)

3.3.1 In conjunction with the National Design Guide, this guidance expands on the 10 characteristics of good design, and sets out an overarching framework for delivery. It is

intended that the document should take into account the design considerations when developing local design guides, but also in determining planning applications.

- 3.3.2 In relation to the appeal, the issues main issues addressed in the Code may be identified as built form, identity and public space, and the document provides specific sections on these issues.

3.4 Manual for Streets (2007)

- 3.4.1 Whilst this document deals with the layout and functioning of streets, it also provides urban design advice on good practice. In relation to the height to width ratios of streets, the guidance recommends that the height of buildings should be in proportion to the width of the intervening public space to achieve enclosure, and states that this is a fundamental urban design principle.
- 3.4.2 For a typical street, the guidance recommends that a height to width ratio of 1:3 is generally effective, and warns that introducing greater heights may lead to an overbearing relationship with the street.

3.5 Local Planning Policy and Guidance

- 3.5.1 Policies of the Revised Test Valley BC Local Plan (2016) should be given weight in accordance with the extent to which they are consistent with the NPPF, as per paragraph 219 of the NPPF. With the above in mind, the following policies are considered applicable and of significant weight.

3.5.2 Local Plan: Strategy and Sites- Policy E1- High Quality Development in the Borough

- 3.5.3 *Development will be permitted if it is of a high quality in terms of design and local distinctiveness. To achieve this development:*

a) should integrate, respect and complement the character of the area in which the development is located in terms of layout, appearance, scale, materials and building styles;

b) should not detract from the dominance of, or interrupt important views of, key landmark buildings or features;

c) should be laid out to provide connectivity between spaces and a positive relationship between public and private spaces; and

d) makes efficient use of the land whilst respecting the character of the surrounding area and neighbouring uses.

Development will not be permitted if it is of poor design and fails to improve the character, function and quality of the area.

3.5.4 The Romsey Town Design Statement (2008)

3.5.5 Area 8 of the Design Statement covers Romsey Old Town, and includes within its boundary, the site and the conservation area. In relation to an appropriate building form, the guidance states that:

- *Satellite dishes should be sensitively placed so that they do not detract from the street scene*
- *New buildings should be well-designed with interesting features and avoiding a plain block appearance*
- *Fenestration should have rhythm*
- *The diversity of building styles, including details, should be retained*
- *The unity of the groups of terraced houses should be retained*

3.5.6 South of the Town Centre: Masterplan (2020)

3.5.6 Adopted in 2020, the masterplan covers the southern area of the town, and includes the conservation area and the appeal site. A key message from the public consultation on the masterplan in its early stages, was the need to retain the character of Romsey, and ensure that proposals do not result in the detriment of the town's unique and special character.

3.5.7 The design principles include the provision of a new pedestrian/cycling gateway to the bypass road, west of Crosfield Hall, and a gateway feature at the junction of Broadwater Road/Palmerston Street. Much of the plan revolves around the enhancement of the public realm, as part of the vision to create a walkable, active and vibrant town, and where activity is orientated to the street, and which also provides a distinct feeling of place.

3.5.8 The masterplan report recommends that across the area, developments of 3 floors may be acceptable, but should balance with surrounding properties. Massing should reflect neighbouring buildings, and should echo the 6-8m burgage plot pattern for buildings over 21m in length. Buildings should also appear subordinate in massing to indicate hierarchy within the built form. In relation to architectural detailing, consideration should be given to the character and variety of roof pitches within Romsey, and dormer windows may also be an appropriate feature. Materials to be used should preserve and enhance the character of the town, and should be locally sources, comprising red brick, white rendered plaster and stone detailing.

3.5.9 Romsey Conservation Area Appraisal and Management Plan (2020)

3.5.10 Included within the Appraisal and Management Plan are a series of character assessments for discrete areas within the conservation area, including Area 4 in that document, which deals with The Hundred and Palmerston Street. This illustrates that Palmerston Street has small, narrow plots, and with buildings of generally two to three storeys, with the latter closer to the town centre, in the northern part of Palmerston Street. Within this character area, street widths and heights of buildings with different roof forms provide variety. Materials palette is red brick with some rendered or painted finishes, but detailing is modest, with many humble terraces with simple banding or no applied decoration at all. Roofs also vary, but are mainly pitched or hipped in slate or clay tile, and most buildings retain original timber sash windows. There is little greenery to the street scene, although the mature tree along the Tadburn Stream (located to the south of the appeal site) help to form a distinctive buffer to the by-pass road, and contribute to the more suburban character of the area.

3.5.11 The view north along Palmerston Street towards The Hundred is identified as an important street view, and the appraisal confirms that beyond the core of the town centre, buildings are generally two storeys except for the grander, detached houses. This indicates a hierarchy of building typologies, with those of larger scale maintaining a prominence as civic or religious structures. The document also acknowledges that modern developments are also sometimes taller and less fine grained than their immediate surroundings, and cites Cherville Court on Mill Lane as an example, concluding that this type of building is not characteristic of the conservation area.

3.5.12 The Appraisal identifies uPVC windows as detrimental to the conservation area, described as *“plastic features are modern, alien additions to the historic environment”*.

3.5.13 In relation to new development within the conservation area, the document states that proposals should take account of, and be sensitive to:

- *the potential to draw inspiration from the historic use and character of a site;*
- *the potential impact of the new design on the setting of any neighbouring listed buildings;*
- *The materials and architectural detailing characteristic of the area should be a key point of reference to inform the choice of materials and detailing of the new design;*
- *The scale and grain of the surrounding area, including plot boundaries;*
- *Its height in relation to its neighbours and surrounding context*

The section concludes that the list is not exhaustive, and each location will present its own unique requirements for a sensitive and appropriate new design. In all cases, new development must be of the highest quality of design, construction and detailing, with the

principle aim of new development should be to preserve and enhance the character of their immediate setting and the conservation area as a whole.

- 3.5.14 Where new developments are considered within the setting of the conservation area, it is important that it considers the character and appearance of the conservation area. It should be sensitive to its location within the setting of the designated heritage asset, and enhance rather than harm its special interest. Any development within the setting should be of the highest quality design and execution, regardless of scale, in order to preserve and enhance the character of the conservation area. The appraisal considers that the rural setting of Romsey conservation area to the south and west is particularly important in interpreting its special interest and historic character. Selection of sites for new development within the wider setting of the conservation area will need to ensure that this green setting can be preserved.
- 3.5.15 Recommendation 5 within the conclusion states that development within the setting of the conservation area should be sympathetic to its special interest in terms of its scale, massing, proportions, materials and detailing, and development which harms its special interest will be resisted.

3.6 National Guidance on heritage and setting

3.6.1 The Setting of Heritage Assets: Historic Environment Good Practice Advice, Planning Note 3 (Second Edition), Historic England, 2017

3.6.2 This provides guidance on setting, and takes as its starting point the NPPF definition as *‘The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance, or may be neutral’*.

3.6.3 The document considers that setting does not just relate to visual considerations, but also *‘the way in which we experience an asset in its setting is also influenced by other factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.’*

3.6.4 The guidance asserts that *‘Extensive heritage assets, such as historic parks and gardens, landscapes and townscapes, can include many heritage assets, historic associations between them and their nested and overlapping settings, as well as having a setting of their own’*.

3.6.5 Setting also includes a whole range of attributes which may be considered intangible, cultural or intellectual as well as sensory, and the guidance advises that these should also be considered in defining the contribution to values and significance. These include:

The asset's physical surroundings

- *Topography*
- *Aspect*
- *Other heritage assets (including buildings, structures, landscapes, areas or archaeological remains)*
- *Definition, scale and 'grain' of surrounding streetscape, landscape and spaces*
- *Formal design eg hierarchy, layout*
- *Orientation and aspect*
- *Historic materials and surfaces*
- *Green space, trees and vegetation*
- *Openness, enclosure and boundaries*
- *Functional relationships and communications*
- *History and degree of change over time*

Experience of the asset

- *Surrounding landscape or townscape character*
- *Views from, towards, through, across and including the asset*
- *Intentional intervisibility with other historic and natural features*
- *Visual dominance, prominence or role as focal point*
- *Noise, vibration and other nuisances*
- *Tranquillity, remoteness, 'wildness'*
- *Busyness, bustle, movement and activity*
- *Scents and smells*
- *Diurnal changes*
- *Sense of enclosure, seclusion, intimacy or privacy*
- *Land use*
- *Accessibility, permeability and patterns of movement*
- *Degree of interpretation or promotion to the public*
- *Rarity of comparable survivals of setting*
- *Cultural associations*
- *Celebrated artistic representations*
- *Traditions*

3.6.6 In terms of the attributes of a proposal with potential for impacts on setting, the following are deemed to be relevant, although not all may be relevant to any particular development:

- *Location and siting of development*

- *Proximity to asset*
- *Position in relation to relevant topography and watercourses*
- *Position in relation to key views to, from and across*
- *Orientation*
- *Degree to which location will physically or visually isolate asset*

Form and appearance of development

- *Prominence, dominance, or conspicuousness*
- *Competition with or distraction from the asset*
- *Dimensions, scale and massing*
- *Proportions*
- *Visual permeability (extent to which it can be seen through), reflectivity*
- *Materials (texture, colour, reflectiveness, etc)*
- *Architectural and landscape style and/or design*
- *Introduction of movement or activity*
- *Diurnal or seasonal change*

Wider effects of the development

- *Change to built surroundings and spaces*
- *Change to skyline, silhouette*
- *Noise, odour, vibration, dust, etc*
- *Lighting effects and 'light spill'*
- *Change to general character (eg urbanising or industrialising)*
- *Changes to public access, use or amenity*
- *Changes to land use, land cover, tree cover*
- *Changes to communications/accessibility/ permeability, including traffic, road junctions and car-parking, etc*
- *Changes to ownership arrangements (fragmentation/permitted development/etc)*
- *Economic viability*

Permanence of the development

- *Anticipated lifetime/temporariness*
- *Recurrence*
- *Reversibility*

4.0 APPRAISAL

4.1.1 Response to the Site and Surroundings

4.1.2 The site is located at the junction with the A27 by-pass road and Palmerston Street, which is a vehicular entry point to Romsey. The approach to the entrance is marked by a continuous landscaping, with mature trees, and the presence of the brick wall to the south which marks the boundary of the Broadlands estate. Despite the traffic and the status of the road, it has a semi-rural character, with glimpsed views of Romsey through the tree lines.



Figure 1- approach from the west along the A27 Bypass road. Broadlands boundary wall to the south (right) of the image, and the Tadburn Stream to the north (left) marked by the tree line.

4.1.3 The junction marks one of the entry points into Romsey, with the appeal site a prominent part of that sequence, clearly viewed on the west of Palmerston Street, but with the focal building being the three gables Old Manor House seen centrally within the viewpoint (Figure 2). For pedestrian uses especially, the sequence also includes views of the Tadburn Stream as the bridge is crossed, reinforcing the semi-rural character of the edge of the township, and indicating its surrounding landscape context (Figure 3). This is a feature which has been recognised within the Conservation Area Appraisal, with the rural setting being of particular importance (see 3.5.14 above).



Figure 2- entrance from A27 Bypass to Palmerston Street, with the appeal site to the west (left), and the distinctive gables of the Old Manor House centrally placed (Google, 2021)



Figure 3- Tadburn Stream and the appeal site, crossing the bridge (Google, 2021)

- 4.1.4 In current views, taken in summer, the view of the existing Edwina Mountbatten House, is heavily filtered by trees and hedgerows, and the low scale of the single storey building ensures that the only noticeable feature is the patinated clay tile roof, with none of the elevations on display. This contrasts with views into the conservation area to the north, where it is the buildings forming the main visual interest, and little or no planting to interrupt the built form. The site as it currently stands relates more to the landscaping qualities of the Tadburn Stream as an extension of that character, rather than the much harder townscape beyond (Figure 4).



Figure 4- current view as of July 2024, taken from the bridge over the Tadburn Stream. The roof of Edwina Mountbatten House can be seen above the hedgerow, and beyond the tree canopy.

- 4.1.5 In views from the north along Palmerston Street, the site is more exposed, but is also read as part of the denser landscaping which marks the Tadburn. The existing building allows for the continued presence of the stream, an important part of Romsey's historic evolution, to still be read as a feature when viewed from the conservation area (Figure 5). The Conservation Area Appraisal asks that this *green setting* be preserved when development sites are identified.
- 4.1.6 The visualisations provided as part of the planning application submission included a Visualisations report, which showed the proposal in some of the viewpoints, in a series of verified montages. These included locations from the A27 Bypass and from the northern end of Palmerston Street. These are re-produced below as Figures 6 and 7.



Figure 5- Edwina Mountbatten House seen from the north, along Palmerston Street, with the Tadburn Stream marked by the tree line beyond.



Figure 6- verified visualisation from the A27 Bypass Road (NPA Visuals)



Figure 7- verified visualisation from Palmerston Street (NPA Visuals)

- 4.1.7 The change between the existing and proposed views are startling, and compromises the relationship of the site and its proximity and legibility with the Tadburn Stream in a way that the existing building does not. There is a failure to recognise the importance of the contrast between the core of the historic town, and its peripheral areas, acknowledged as important within the conservation area appraisal, and no attempt has been made to accommodate the existing landscape as part of the development. This forms part of the setting both of the town and the conservation area, and early consideration on design solutions which allowed the distinctive entry point to Romsey to remain as part of its crucial identity, is missing in the documentation. The needs of the site itself, and the contribution it makes to the larger townscape, context, and setting is not explored in any of the appellants submissions. The NPPF requirements that developments should be sympathetic to local character and history, including the surrounding built environment and landscape setting is not delivered with the proposal. Nor does the inspiration for the design appear to be derived from the character of the site, as advised in the Conservation Area Appraisal. The site itself, including its location on the periphery of the town and its associated landscape setting of the Tadburn Stream and the Broadlands Estate, is of a different character than the remainder of Palmerston Street and the conservation area, and forms part of the setting for these. The Historic England guidance on setting of heritage assets, contains advice on the importance of the assets physical surroundings, including trees, spaces, vegetation, and surrounding landscape. In my opinion, there is a visual, cultural, functional and intellectual link between the site and its distinctive location in relation to the town, and the starting point for a design response is required to take these issues into account. There is no evidence that this has been undertaken at any stage, and what is proposed is a formulaic and seemingly template development which does not consider the site itself and the larger role it plays. This runs contrary to both national and local guidance and policies.
- 4.1.8 The Design and Access Statement submitted as part of the application does contain a section on the site, with claims that it was once a timber yard, but is silent on the importance of the surrounding landscape and the role it plays in helping to describe and define the town. This is exacerbated by the contextual analysis which follows the site description, which considers the built forms within the area, and a single entry, termed a constraint, of *Trees to southern boundary*. The site opportunities section makes no mention of landscaping or how any proposals could work with the existing. In the words of the highly critical Design Review Panel letter, *a more detailed analysis of the site and the contextual arrangement is required to fully infer the design decisions behind the current proposal*. There is no evidence that this sound advice was acted on, and the Design and Access Statement appears to be more concerned with the creation of a *new urban gateway* rather than a development which would complement the existing context, and the unique attributes of the site. Rather than enhance the existing natural landscape associated with the Tadburn Stream, and which provide an existing gateway into the town, the proposal involves the loss of trees.

4.1.9 The pursuit of a 'gateway' into the town has taken the form of a 2.5/3 storey structure, with a strong linear alignment and recessive corners to the Palmerston Street elevation. The southern elevation is over 12m in height above the level of the bridge crossing Tadburn Stream. As the verified visualisations illustrate, this will have a dramatic impact on the appreciation of the natural landscaping, and the entrance to the town (Figure 6). In place of a more naturalistic entrance feature, the proposal replaces this with a large built form which overwhelms the landscape, reducing it to a secondary rather than its current primary role. The South of Romsey Masterplan does suggest a gateway on Palmerston Street, but not at this location, and it is a much lower key feature which marks a renewed Broadwater Road. Gateways are not required to be marked by built form, and more especially built form which is contextually out of scale with its context, and are used to denote changes between the periphery of a town and its focal core, and this facility has been suggested in the proposed gateway contained in the South of Romsey Masterplan, rather than at the junction with the Bypass Road. The development of the proposal with a larger scale and mass than the existing, changes the entry sequence to the town from a gentle transition from the rural south to an immediate hard built form, which acts as a visual detractor from the listed buildings within the conservation area which are currently the visual destinations, and is detrimental to the character of the conservation area, and the general town. One of the characteristics to the setting of the conservation area at this point is the 'low-key' entrance to Romsey, firstly through the use of the appeal site by the occupants of the Old Manor House as part of its agricultural curtilage, and since 1970 as a low scale building which allows the landscaping to be read as the primary feature.

4.2.1 **Design of the Proposal: Architectural and Massing Response**

4.2.2 The Design and Access Statement claims that the proposal is context led, and describes the palette of materials to be used, features such as dormers, the scale of the surrounding buildings and the architectural typologies present in the area. In my opinion, the approach is a highly reductive and debased interpretation of the existing context, rather than an honest attempt to replicate, and lacks design integrity. The proposal has a jarring and hesitant character and appearance, neither a truthful and authentic composition using the characteristics of the prevailing buildings, nor a contemporary re-imagining of them.

4.2.3 The elevational treatment contains little of the finesse of the existing buildings within the area, proposing a fenestration pattern of largely equal dimensions, rather than the varied sizes of the earlier buildings. Whilst there are examples of a more regimented fenestration pattern in some of the buildings, the norm is for diversity. Similarly, dormers are also featured within the town and the conservation area, but are generally small in proportion to the volume of the roof. Figure 8 shows part of the terrace of 20-24 Palmerston Street, and illustrates the difference in window pattern and size between ground and first floor, and the dormers above,

which are smaller again. The windows are a mix of vertical sliding sashes and casements, with glazing bars. They are in timber, unlike the proposal which stipulates a uPVC material. The window styles vary throughout the area, whereas the proposal seeks to use a single window type of casement design, and existing dormers are wholly contained within the mass of the roof. Some of the proposed dormers cut through the eaves line and terminate as part of the facade, which is not a device found within the immediate area, and they are substantial and overscaled in size, unlike many of the existing dormers which range in size, but are more diminutive than the windows to ground and first floors.



Figure 8- elevations of 20-24 Palmerston Street

4.2.4 The arrangement of the form is linear blocks, with minimal set-backs to the corner blocks is claimed as a local characteristic of the area, and whilst linear terraces are present and help

enclosure, there are many differences in detail between them. Nos 30-36 Palmerston Street, for example is some 11m m in length, with stepped entrances and double doors. They are fenestrated at basement level, and have dormers which begin at the eaves level (Figure 9). The adjacent terrace of 38-46 Palmerston Street is c.19m linear, and is of two storey form. Fenestration varies, with segmental arch windows to ground and square headed to first floor, and is generally casement type, but there are also vertical sliding sashes. No. 46 has a fluted column architrave to the entrance, whilst the remainder of the terrace is simply plain (Figure 10).



Figure 9



Figure 10

4.2.5 The elevation to Palmerston Street in the proposal is some 22m for the central section, or 32m in length if the two corner blocks with minimal set-backs are included. Fenestration is of a consistent dimension, at ground, first floor and roof level, and this has led to a difference in the solid to void ratio when compared to the surrounding building stock, with the proposal having relatively more openings than the existing buildings. The consistency of the roof pitches and the large mass of slate effect or clay effect tiles on the proposal, also differs from the surrounding buildings, which have different roof pitches, and which provides more variety to the townscape. The proposal has approximately the same degree of mass to the roof as to the elevations, which is uncharacteristic of the area, where the elevations are the prominent features. The mix of finishes, either red brick or white painted brickwork, is also regimented, with the white bookending the red brick section. Whilst the conservation area does have both red brick and white finish, it is not in patterned form and adds to the diverse nature of the townscape. The letter from the Design Review Panel states that the *design style is not well proportioned and does not represent a correct interpretation of historic features and details, and the roof forms also are too uniform and the number and mix of materials is not appropriate to the context or the materials specified*. I agree with this assessment, and consider that the proposal is based on a 'pick and mix' approach rather than a considered response. It does not represent a bespoke design solution, but rather the imposition of a formulaic Churchill 'product', poorly adapted to try and fit the context.

4.3.1 **Scale and Bulk: Response to enclosure and overbearing**

4.3.2 The site is raised from the surrounding street, which has an average AOD of c.15m on this section of Palmerston Street. FFL is anticipated as 16.70m AOD. At its narrowest point, street width in this section is c.9.00m from the edge of the appeal site to the building line of the houses opposite. The proposal is located c.0.80m closer to the footway on Palmerston Street than the existing, and this provides for a space of c.14m between the building line of the proposed and the houses opposite.

4.3.3 The current Edwina Mountbatten House has a ridge height of c.5.40m above ground level, as a single storey building, which is c.7.00 above the footway. The proposal on Palmerston Street has a maximum ridge height of c10.50m which equates to c.12.20m above the footway, given the FFL.

4.3.4 The ridge height of the existing buildings at 30-36 Palmerston, is c.7.60m AOD, whilst that of 38-48 Palmerston Street is c.6.70 AOD. As the visualisations illustrate, this replaces the existing single storey building with a height roughly matching that of the buildings opposite at 38-48 Palmerston, with a building which is taller in excess of 5.00m, and which is 5.50m

higher than the terrace of 38-48 Palmerston Street. The impact on pedestrians using the western footway will be noticeable, and compounded by the proposed 1.2 m boundary.

- 4.3.5 In relation to appropriate width to height ratios, good urban practice described in the national Model Design Code and Manual for Streets, classifies Palmerston Street as a secondary street which takes traffic into local centres, and which should have an enclosure ratio of 1:3 or 1:2.5, given its residential nature. For a road of 14m in width, this would equate to a building height of no greater than c.6.0m to allow for a 1:2.5 ratio. The proposal is double this figure. Manual for Streets recommends that the height of buildings is in proportion to the width of the intervening public space, and calls this a fundamental urban design principle.
- 4.3.6 Whilst enclosure needs to be provided to 'hold' the street, this could be achieved at the appeal site by replicating the height of the existing building opposite. This would not conform to the recommended height-width ratios, given the narrowness of the street, but would provide a balanced townscape, and allow for a rough 1:1 ratio, which might be an acceptable scenario. However, the scale of the proposed building means even this standard cannot be achieved, and leads to an excessive degree of enclosure. The outcome of this is an overbearing proposal, as recognised by the Design Review Panel in its response to the scheme.
- 4.3.7 Overbearing does not simply relate to the mathematics of height-width ratios, but also the perception of public space users, especially pedestrians. The raising of the scheme some 1.67 m above the ground level, and the poor proportions of the façade and heavy volume of the roof, will lead to a street where users feel overwhelmed by the building. Neighbours opposite at 38-48 Palmerston Street, at a lower level than the appeal site, will be faced with a building which has increased from the existing outlook by some 6.8m. This is approximately the same height as the building they occupy, and will appear taller given the proposal has encroached an extra 0.80m to the site boundary. The heritage model lighting columns in this section of Palmerston Street, stand at 8.62m above the footway. The proposal is almost 4m higher than this at ridge height, and in a continuous, linear block, rather than the vertically aligned and slender lighting columns, as seen in Figures 4 and 5. Street users and residents opposite will perceive this change in status as detrimental and overbearing.
- 4.3.8 The description of the design development and changes made to comments within the Design and Access Statement, claim that the scheme is contextual because it is of two stories in height, and therefore relates to the local context of this section of Palmerston Street. However, the description of two storeys does not take account the FFL of over 1.50m from the footway, nor does it account for the heavy volume of the roof, nor the massing of the elevations. Whilst 3 storey buildings are located in the northern section of Palmerston Street, the 3.5 storey terrace of townhouses at 11-17 Palmerston are some 11.50m in height, and

this also includes a basement feature and stepped entrance, and they occupy a frontage of some 16.5m linear rather than the much greater length of the proposal. Whilst the description may read as two storeys, the reality is that the proposal is higher above the footpaths than the existing 3-storey buildings within the conservation area.

5.0 SUMMARY AND CONCLUSION

- 5.1 The proposal is claimed to be contextual, and the Design and Access Statement presents the case that the scheme does comply. However, my evidence has shown that the claims do not bear scrutiny, and that the architectural approach does not take account of the site itself.
- 5.2 The approach taken seemingly dismisses the site, relegating it to a location which has no role to play at an entrance point to Romsey and the conservation area. However, the site does have a role, as part of a low-key gateway, and as an associative element of the rural setting of the town. A new gateway is simply not required in this location.
- 5.3 The architectural approach lacks integrity and simply chosers to adapt a collection of features from within the conservation area in a 'pick and mix' fashion, which lack authenticity. Timber windows are provided in uPVC, chimneys are composite material which are non-functioning, door canopies are GRP, roof coverings are slate effect or clay tile effect. Fenestration is regimented and lacks a hierarchy. The solid to void ratio, massing and proportions are different to the existing townscape. The character of the proposal is institutional rather than finely grained.
- 5.4 The scale of the proposal leads to overbearing, dwarfing the existing vertical features such as the lighting columns, and the houses opposite. Raised some 1.70m above the footway, the development will look and feel oppressive to street users. Despite its description as a two storey building, the actual height is more akin to a 3.5 storey structure, and its linear length and heavy volume of the roof at such a height will be overbearing.
- 5.5 The proposal does not conform to the policies within the NPPF relating to the need to be sympathetic to local character and history and landscape setting, they do not establish or maintain a strong sense of place, and nor can they be described as good architecture. The proposals are part of a portfolio of Churchill 'products' as described within the letter of the Design Review Panel, rather than a bespoke design grounded in the site and its context.
- 5.6 Neither does the proposal satisfy the National Design Guide, which asks for development which are integrated into their surroundings so that they relate well to them, and respond to local history, culture and heritage. They do not consider the site itself, nor take account of

form, scale, massing and appearance. As such the development fails to satisfy the requirements on context, identity and built form.

- 5.7 Policy E1 within the Local Plan requires development to be high quality in design and local distinctiveness. It should integrate, respect and complement the character of the area in terms of layout, appearance, scale, materials and building styles, and respect the character of the surrounding area. The proposal does not integrate, but imposes, substituting a small scale building with a structure which is overbearing and which is a failed exercise in copying and pasting architectural features.
- 5.8 Both the NPPF and the Local Plan state that poor design should be refused, and the proposal cannot be described as anything other than poor design. This conclusion was reached by an independent Design Review Panel, and I share the concerns expressed in their letter.