

**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**

**SUMMARY PROOF OF EVIDENCE: DESIGN**

**Rob Burns, BA, MCD**

**On behalf of Test Valley Borough Council**

**July 2024**

- 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 was approached by Trent 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.
- 1.1.3 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.
- 1.1.4 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).
- 1.1.5 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

1.1.6 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.

1.1.7 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.

1.1.8 NPPF (2023) 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.

1.1.9 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.

1.1.10 The National Design Guide (2021) sets out 10 characteristics of well designed places, and the most relevant of these to this appeal are Context, Identity and Built Form. The Guide also states that LPA' should have regard to the recommendations of Design Review Panels.

1.1.11 The National Model Design Code (2021) expands on the 10 characteristics, whilst Manual for Streets provides guidance for good practice on the layout of streets, and in particular the appropriate height to width ratios.

1.1.12 The Revised Test Valley Local Plan (2016), Policy E1 relates to High Quality Development, and states that:

*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.*

- 1.1.13 The Romsey Town design Statement (2008) and the Romsey Conservation Area Appraisal and Management Plan (2020), both assess the existing characteristics of the area, and provide recommendations on appropriate development. The South of Romsey Town Centre Masterplan (2020) provides design principles which will ensure the town's unique and special character is not diluted.
- 1.1.14 National Guidance on the setting of Heritage Assets is provided by Historic England, which explains that setting is not simply dealt with by visual aspects, but a range of other considerations.
- 1.1.15 The site of the proposal relates to the rural surroundings of Romsey, and is characterised by a dense tree line to the south of the site, which marks the location of the Tadburn Stream. The existing gateway is a low-key entry point to the town, as the rural features of planting and water course provide a gentle introduction to the built qualities of Romsey and its conservation area. The existing building, whilst visible, is of a low-scale, and the most prominent feature is the patinated clay tiled roof. This allows the trees and landscaping to remain as the dominant element. When viewed from within the conservation area to the north along Palmerston Street, the tree line of Tadburn Stream presents a strong, naturalistic boundary feature.
- 1.1.16 The proposal fails to acknowledge the specific context of the site and its landscape setting, which is quite different to the remainder of the town and the conservation area, but rather seeks to transpose a heavy built form which compromises the quality of the entry point. The proposal is an intensification of the urban at the cost of the landscape setting, and neither works with the existing character of the site, and its role as part of the setting of the conservation area and the series of listed buildings along Palmerston Street, nor contains a narrative reflecting the history of the site and its contribution to the area.
- 1.1.17 The architectural and massing response to the site is claimed to be context led, but in reality is a highly reductive and debased interpretation of the forms and detailing which provide intrinsic qualities to the town. The massing is compromised by the atypical fenestration of repetitive window dimensions and styles, overscaled dormers, and which occupy much of the volume of the roof, and the solid to void ratios of the elevations. The design lacks integrity and proposes artificial materials which are alien to the conservation area, including slate effect and clay effect roofing, false chimneys in an unspecified material, uPVC windows, GRP canopies, and art-stone. The design is a pick and mix approach, and is a formulaic Churchill 'product' rather than an attempt at a bespoke design which picks up cues and concepts from both the site and the conservation area.

- 1.1.18 In relation to scale, bulk and overbearing, the site is raised above the footways along Palmerston Street, with a FFL of over 1.70 AOD. In relation to the existing Edwina Mountbatten House, the ridge height is some 7.0m above the footway, whilst the proposal is 12.20m above. The terrace of 38-48 Palmerston Street opposite the site has a ridge height of 6.60m, meaning that the proposal is some 5.50m higher than the terrace. This creates a critical imbalance in the townscape, at the point of entry to Romsey.
- 1.1.19 The street width in this section of Palmerston Street is some 9.00m, including footways, from the site boundary of the appeal site to the building line of the terrace opposite. There is a gap of 14.0m between the building line of the proposal and the terrace of 38-48 Palmerston Street. Good practice in height to width ratios for a secondary street is 1:3 or 1:2.5, which for a width of 14.0m equates to c.6.00m of height to a building which encloses the space. The proposal is double this figure. An acceptable scenario may be to reduce the height-width ratio to 1:1, but this would mean that the appeal site maximum heights would be no greater than the terrace opposite, of c.6-7.00m.
- 1.1.20 In addition to the proposal not conforming to good design practice on this issue, there is also the perception of overbearing and too tight an enclosure. Currently the outlook of residents and street users is to a building on the appeal site which is 7.00 above the footway. The additional height of the proposal means that they now face a structure which is over twice that size, and given the narrowness of the footways and the carriageway itself, this will simply be overwhelming. Whilst the existing street lighting columns are vertical elements of 8.62 m in height, they are interspersed and slender, and the verticality in the streetscene will be replaced by a long linear elevation with a high ridge datum, which itself oversails the light columns.
- 1.1.21 The scheme may be described as 2 storeys in height, but in reality it is much higher than that, and over 1.00m higher than the existing, historic, 3.5 storey townhouse terrace at 11-17 Palmerston Street, and it is much longer in length. The impact is hardened by the massing, and the heavy appearance will lead to overbearing.