

**EDWINA MOUNTBATTEN HOUSE, BROADWATER ROAD, ROMSEY,  
HAMPSHIRE SO51 8GH**

**REBUTTAL PROOF OF EVIDENCE**

**ALEXANDRA WEBB**

BSc (JOINT HONS) MSc MRTPI  
Associate

Southern Planning Practice Ltd  
Youngs Yard,  
Churchfields,  
Twyford,  
Winchester,  
Hampshire,  
SO21 1NN

[www.southernplanning.co.uk](http://www.southernplanning.co.uk)

Planning Inspectorate References: **APP/C1760/W/334251**  
Test Valley Borough Council Reference: **23/01700/FULLS**

JULY 2024

## Contents

## Page

|     |   |   |
|-----|---|---|
| 1.0 | INTRODUCTION.....                       | 3 |
| 2.0 | THE EVIDENCE OF MR ROB JACKSON .....    | 3 |
| 3.0 | THE EVIDENCE OF MR DOMINIC SCOTT.....   | 5 |
| 4.0 | THE EVIDENCE OF MR PAUL WHITE.....      | 6 |
| 5.0 | THE EVIDENCE OF MR MATTHEW SHELLUM..... | 7 |

## **1.0 INTRODUCTION**

1.1 This rebuttal proof of evidence has been prepared to rebut points raised in the Appellants' proofs.

1.2 In preparing this rebuttal I have not addressed every point raised in the Proof of Evidence of Mr Rob Jackson and Mr Dominic Scott in respect of design matters, Mr Paul White in respect of heritage matters and Mr Matthew Shellum in respect of planning matters, however, this does not mean that I am in agreement with any of these views by virtue of omission.

## **2.0 THE EVIDENCE OF MR ROB JACKSON**

2.1 I will address the rebuttal points under the following headings which correlate with Mr Jackson's proof:

### **5.6 Theme 1: Size, Scale, Mass and Bulk**

5.7 At paragraph 5.6.12 Mr Jackson states that "*the character areas of the surroundings have identified the local scale as two to three stories*" however for Area 4: The Hundred and Palmerston Street in the Romsey Conservation Area Appraisal (CAA) it expands on this characteristic and states that "*Buildings are generally two to three storeys, taller structures generally closer to the town centre, particularly the north end of Palmerston Street*" and therefore taller structures are not considered to be typical characteristic across the character area.

5.8 At paragraph 5.6.13 Mr Jackson states “*The proposed design is for a two storey building facing Palmerston Street, with some limited dormer windows in the roof*”. This is mis-leading as it is clearly two-and-a-half storeys.

## **5.7 Theme 2: Appearance**

5.9 The Visually Verified Montages referred to at paragraph 5.7.13 and contained in Appendix I are different to those shown to the planning committee. These include re-labelled viewpoints and two new viewpoints ‘View 4 - Palmerston Street, adjacent to Manor House’ and ‘View 5 - Palmerston Street Traffic Crossing Bollard’ which were not previously included. The view from Broadwater Road, Pedestrian Crossing has been excluded. Both these and the original montages are not considered to form part of the original submission of the application, subject of this appeal.

## **5.8 Theme 3: Amenity**

5.10 At paragraph 5.8.8 Mr Jackson states that “*the height-to-width ratio of the street changing from 1:3 to 1:2, as we have already seen in Theme 1, is not an unacceptable ratio*” it must be highlighted that the drawing SITE SECTIONS THROUGH DEVELOPMENT HEIGHT TO WIDTH RATIOS’ dated June 2024 at Appendix 7 did not form part of the original submission of the application, subject of this appeal.

5.11 Paragraphs 5.8.10-5.8.14 also make reference to the Verified Visual Montages which did not form part of the original submission of the application, subject of this appeal.

## **6.2 Review of proposed design compared to NPPF paragraph 137**

5.12 At paragraph 6.2.7.6 Mr Jackson again states that the majority of the elevation to Palmerston Street is “*two storey scale, with some discreet dormers in the roof*” when it is two-and-a-half storey. This is misleading. The SE corner of the site is correctly identified as “2.5 storey” when it is technically lower than the majority of the proposed elevation to Palmerston Street.

5.13 At paragraph 6.4.3 Mr Jackson states in relation to 30-36 Palmerston Street that “30-36 do not face the proposed scheme, rather they face down Broadwater Road”. This is misleading as these properties have a clear view of the appeal site.

## **3.0 THE EVIDENCE OF MR DOMINIC SCOTT**

3.1 I will address the rebuttal points under the following headings which correlate with Mr Scott’s proof:

### **4.2. Built Form**

#### **4.2.1 Urban Form & Layout Character**

3.2 Under the ‘Density’ section Mr Scott refers to figure 2 as a density sample and a ‘typical example’. This sample area is approximately 425m from the eastern edge of the appeal site and therefore cannot be considered as an example taken in close proximity of the appeal site.

## **Section 5. Design Review**

### **Reason For Refusal 2**

#### **Issue One – Size , Scale and Massing**

- 3.3 At paragraph 5.10 Mr Scott refers to “Visually Verified Montages 01 and 02 produced by NPA Visuals” and as per Mr Jackson’s proof, these did not form part of the original submission of the application, subject of this appeal.

#### **Issue Two – Overbearing and Sense of Enclosure:**

- 3.4 At paragraph 5.22 Mr Scott refers to ‘Drawing number I0123R-SK18 produced by Planning Issues’ and as per Mr Jackson’s proof, this drawing did not form part of the original submission of the application, subject of this appeal.

## **4.0 THE EVIDENCE OF MR PAUL WHITE**

- 4.1 I will address the rebuttal points under the following headings which correlate with Mr White’s proof:

### **3.5 Summary**

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

- 4.2 It is unclear what the difference is between the usage of the words 'neutral' and 'none' are in terms of the 'Contribution of the Appeal Site to heritage significance within the setting of designated heritage assets' in the second column of the table.

### **5.0 THE EVIDENCE OF MR MATTHEW SHELLUM**

- 5.1 I will address the rebuttal points under the following headings which correlate with Mr Shellum's proof:

#### **5.0 Meeting Identified National and Local Housing Needs for Older Persons Accommodation**

- 5.2 It is unclear which assessment Mr Shellum is referring to under paragraph 5.6. The correct name for what I believe Mr Shellum is referring to as the 'Test Valley Housing Needs Marketing Assessment (2022)' is the 'TVBC Strategic Housing Market Assessment Final Report January 2022', this is also referred to as the 'SHMA'.
- 5.3 In the same paragraph, Mr Shellum refers to figures calculated "over a 10 year period" when the figures in the SHMA are based on the period of 2020-2040 and therefore further clarification is requested as to how his figures have been calculated.

## **Social Benefits**

- 5.4 At paragraph 5.16 Mr Shellum states that *“Specifically designed housing for older people offers significant opportunities to enable residents to be as independent as possible in a safe and warm environment”* and at 5.17 states that *“Specialist Retirement Living housing offers significant benefits which can help to reduce the demands exerted on Health and Social Services and other care facilities”* however this is only by practitioners being able to visit *“several occupiers at once”* other than a ‘Lodge Manager’ no other additional on-site support would be provided. The proof of Mr Jackson at paragraph 4.2.5 makes it clear that *“there is no staff accommodation, and no specialist medical facilities are proposed. The development is for independent living and does not contain any ‘extra care’ facilities”*.

## **8.0 Why Planning Permission should be Granted**

### **Material considerations**

- 5.5 The wording of the headings listed under paragraph 8.2 do not match those as agreed under the SoCG but it is acknowledged they match the essence of the considerations agreed.