

#226

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Collector: Web Link 1 (Web Link)  
Started: Friday, March 29, 2024 11:50:27 AM  
Last Modified: Friday, March 29, 2024 11:54:37 AM  
Time Spent: 00:04:09  
IP Address: [REDACTED]

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Q1

Title Mr/Mrs/Miss/Ms/Dr/Other(please state)\*

Dr

Q2

First Name\*

Patricia

Q3

Surname\*

Roberts

Q4

Organisation\*(If responding on behalf of an organisation)

n/a

Q5

Email address \*

[REDACTED]

Q6

Postal address\*

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

## Q7

Insert any general comments that do not relate to a specific paragraph number or policy in the general comments box below.\*If you are suggesting a change is needed to the draft Local Plan or supporting document, it would be helpful if you could include suggested revised wording. If you are commenting on a document supporting the draft Local Plan (such as a topic paper, or the Sustainability Appraisal), please indicate so.

### General

#### 1) Public Realm Scrutiny in Masterplans:

It is clear that the Draft Local Plan has been professionally produced by the planners, and has had extensive scrutiny, with associated documents, topic papers and evidence studies all contributing to the decisions made. In particular, the various housing options have been subject to a selection process based on this background information.

The South of Romsey Town Centre (SoTC) Masterplan contains large changes for Romsey, particularly in the area of public realm developments, including the redevelopment of the bus station, and the demolition and rebuilding of Crosfield Hall. The SoTC Masterplan has been produced by Nexus Planning and Perkins and Will Architects for Romsey Future, rather than by TVBC planners. It does not provide background evidence of e.g. impact assessments or sustainability appraisal. In particular, the public realm developments in Romsey do not show evidence of the same consideration of possible options that is clear in the Draft Local Plan. This point is relevant to the Draft Local plan, as the Masterplan is embedded with the Local Plan document.

Impact assessments and sustainability appraisal for the public realm works should be present in either the Masterplan or the Local Plan. At present this scrutiny is missing, and this could result in uninformed decisions on the public realm developments.

### General

2) Inclusion of Romsey South of Town Centre Masterplan: The South of Romsey Town Centre Masterplan is included in Policy SA1 and many references throughout the Local Plan show that it is an integral part of the plan. However, it has not currently received the scrutiny given to rest of the Local Plan and it is possible that assessment may show that revision of the Masterplan is required, to bring it up to the quality required. It should be made clear that the Masterplan is not yet in a state in which it can be included in the Local Plan.

### General

#### 2) 1) Public Realm Scrutiny in Draft Local Plan:

Given that the Romsey South of Town Centre Masterplan has not been subject, during its development, to the same scrutiny as the Draft Local Plan, this could be remedied in the Local Plan, to ensure that the public realm decisions have been properly considered.

However, there has been little reference to the Town Centre Masterplans in the supporting documents for the Draft Local Plan. The town centre masterplans have not been considered in the Sustainability Appraisal, apart from the residential development, nor are they considered in the Infrastructure Delivery Plan, or the Landscape Sensitivity Study.

The Health Impact Assessment and Equality Impact Assessment include mention of the town centre masterplans. However, the assessments been done retrospectively and seem to have been done at a high level, and in a cursory manner, considering, for Romsey at least, the vision of the Masterplan rather than the details of the plan. The town centre plans require a thorough sustainability appraisal, of the sort given to the remainder of the local plan, or there is a risk that unsuitable public realm developments will take place.

### General

3) Local Plan Updates: The Local Plan will require update, as stated in 5.45 and elsewhere, following updates to Building Regulations. Will there be an opportunity to comment on the updates? It would be good to state this somewhere if it's true.

### General

4) BREEAM for Town Centre developments– 5.54 states that BREEAM assessments will be carried out on non-residential developments of >500m. There is a danger that the BREEAM assessments are carried out each part of the town centre developments on a piecemeal basis, and do not considered the town centre development as a whole, missing the opportunity to improve the overall development. A BREEAM Communities assessment of the Masterplans could remedy this.

### General

5) Emissions: Section 2.30 states “The Local Plan 2040 will have an impact on cutting our emissions through minimising the impact development has on emissions and adaptation to manage impacts.”

However, because sustainability has not been addressed in the overall concept of the South of Romsey Town Centre Masterplan (although the Masterplan is included in policy SA1 of the local plan) the development described in the Masterplan will produce substantial unnecessary emissions, by replacing two existing buildings, Aldi and Crosfield Hall, with new buildings. In particular, there has been no consideration of the possibility of refurbishing Crosfield Hall, rather than demolishing and rebuilding it. Refurbishment would result in very much lower CO2 emissions than demolition and rebuild.

The question of possible refurbishment would have been considered if the Masterplan had been subjected to the BREEAM Communities assessment.

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## Q8

Insert any specific comments in the general comments box below, indicating which paragraph, policy or matter your comments relate to where possible.\*If you are suggesting a change is needed to the draft Local Plan or supporting document, it would be helpful if you could include suggested revised wording.

### Specific

1) Health impact assessment – The Health Impact Assessment Matrix in Appendix 1 assesses each of the 10 local plan objectives against the 11 health impact criteria. Local plan objective 3 refers to the town centre plans. The assessment states that 8 of the 11 criteria show a positive health impact, with the remaining three being neutral.

This suggests that the assessment has not considered the detail of the South of Romsey Town Centre Masterplan, particularly the medium and long term scenarios, in which the Crosfield Hall is to be removed from the centre of Romsey. This act will have a negative impact on Neighbourhood Amenity (criterion 4), Accessibility (criterion 5) and Social cohesion (criterion 9). The removal of Crosfield Hall from the centre will reduce the ability of visitors to the town centre, and in particular bus users, to access events in the new Hall, and, conversely, will make it more difficult for users of the new Hall to access the facilities of Romsey. Both of these will reduce social interaction, and be detrimental to mental health.

This assessment should be re-considered, or it should be made clear that it has been carried out on the aspirations of the South of Romsey Town Centre Masterplan, rather than on the detail of the medium and long term scenarios in the Masterplan.

### Specific

2) Equality impact assessment – The Equality Impact Assessment Matrix in Appendix 1 assesses each of the local plan policies, objectives and vision for the 9 equality groups. Objective “Town Centres” refers to the town centre plans. The assessment finds that the town centre plans will have a positive impact on the “Age” and “Disability” groups, and a neutral impact on all other groups.

This suggests that the assessment has not considered the detail of the South of Romsey Town Centre Masterplan, in which the Crosfield Hall is to be removed from the centre of Romsey, and in particular from the bus station. This act will have a negative effect on the “Age” and “Disability” groups. The removal of Crosfield Hall from the centre will reduce the ability of people in these groups who are visiting the town centre to access events in the Hall. This is particularly true for aged or disabled bus users, who will be faced with a long walk across at least two main roads to reach the new hall at the Rapids. It will also make it more difficult for aged or disabled visitors who come by car to the new Hall to also access the facilities of Romsey.

This assessment should be re-considered, or it should be made clear that it has been carried out on the aspirations of the South of Romsey Town Centre Masterplan, rather than on the detail of the medium and long term scenarios in the Masterplan.

### Specific

3) Whole life carbon assessment: Policy CL3 states that non-residential developments of >5000m additional floorspace will require a whole life carbon assessment. Why does this not apply to all major non-residential development (i.e. > 1000m<sup>2</sup>), as recommended by the UK Green Building Council document Embodied Carbon Scope 3 Measurement and Reporting?