

12 August 2022

Ian Young  
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**Subject: Rowlands Castle Neighbourhood Plan, Reg 14 Pre Submission consultation**

Dear Ian,

Thank you for consulting the South Downs National Park Authority (SDNPA) on the Regulation 14 Pre Submission version of the Rowlands Castle Neighbourhood Plan (RCNP).

This representation sets out the South Downs National Park Authority's (SDNPA) response to the Submission version of the RCNP. These are officer level comments prepared by SDNPA Planning Policy officers.

The National Park Authority welcomes the publication of this plan, which is a result of a considerable amount of hard work by the parish council and the local community. The SDNPA have a number of specific points which are set out below.

Please do get back to me if you have any queries on these comments or if you need any further information as you prepare to submit the RCNP.

Yours Sincerely



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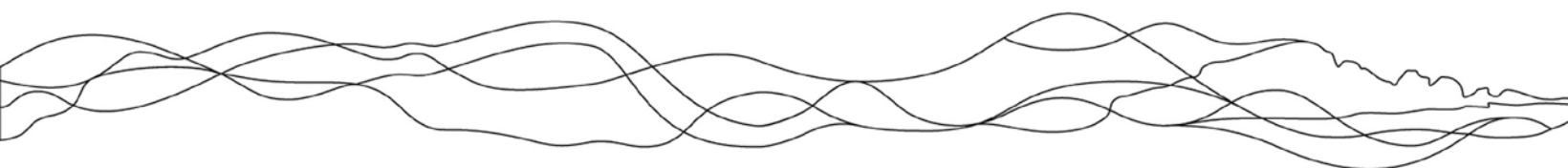
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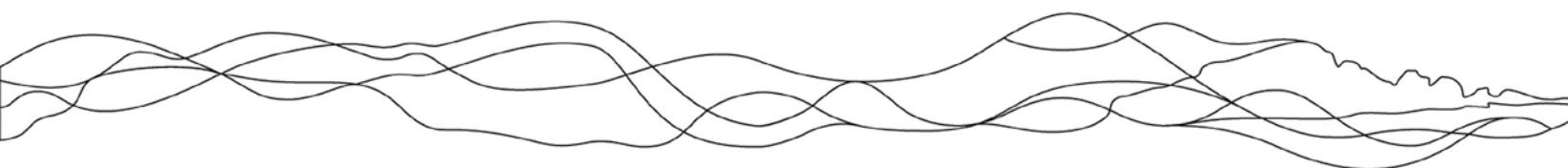
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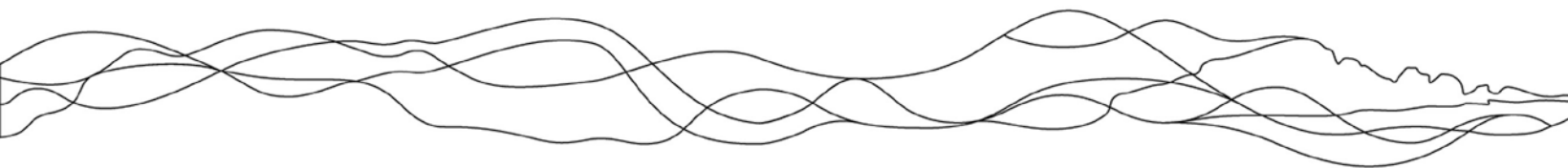
Page No / Section	Comments
Page 5 – Map 1	The Neighbourhood Area has been designated, therefore the key should be updated to show the designated neighbourhood area, not the proposed neighbourhood area as currently shown
Paragraph 1.11	The majority of this paragraph is describing the constraints which exist in the Parish. The first sentence appears to set out the strategy and the second sentence appears to establish the aim. Is the sole aim of the plan to maintain the separate and distinctive settlements of the Parish? Consideration should be given to redrafting this paragraph to focus on the strategy of the plan as the title suggests.
Paragraph 1.11	It would be helpful to refer to the purposes and duty of the National Park in this section. As currently drafted the paragraph states that it is essential to minimise any impact on the landscape of the National Park. The purposes and duty of the National Park go beyond minimising impact on the landscape and it would be helpful if the purposes and duty were set out clearly in this section. It is also important to note that under Section 62 of the Environment Act 1995 all relevant authorities including the parish council, the district council and the national park authority are required to have regard to the purposes of the National Park.
Paragraph 1.14	The reference to Hampshire Minerals and Waste Plan is a plan produced by the Hampshire Authorities including Hampshire County Council, the South Downs National Park Authority, New Forest National Park Authority, Portsmouth City Council and Southampton City Council. The reference should be to the Hampshire Minerals and Waste Plan only.
Paragraph 1.15	This paragraph refers to the Development Plan for the Rowlands Castle. The RCNP will form part of the development plan once adopted; it is currently not part of the development plan
Paragraph 1.16	As per the comment above, the RCNP is still a draft plan and not adopted so the paragraph should be amended to address this. The final sentence should be modified as follows as there is no need to refer to resolution of conflict not being in favour of the local plans Any conflict between nonstrategic policies of these documents would be resolved in favour of the most recently adopted plan. <del>not necessarily the Local Plans.</del>
Policy 1 – Gaps between Settlements	Further justification of the identified gap should be included in the supporting text to the policy. As currently drafted the supporting text just lists the policy aims and supporting evidence. It would be useful to include some commentary as to why the gap covers such a large area. Are there landscape features or important views within this area which the policy is seeking to protect for example. If the policy intention is to prevent coalescence this should be stated in the policy. For example the policy could be drafted to read:  'The open and undeveloped character of the gaps between Rowlands Castle and Havant as shown on the Policies Map will be protected to prevent coalescence, retain the identity of the separate settlements, protect their landscape setting and protect designated views'



<p>Policy 2 – Landscape Character and Views</p>	<p>The first criterion of the policy (1) is seeking to address landscape character and the Ecological Network Opportunity Areas. Whilst these matters are clearly related, it is not clear in the policy or supporting text how the Ecological Network Opportunity Areas relate to the landscape character or what contribution they make to the distinctive landscape character of the Parish. Further consideration should be given to whether the Ecological Network Opportunity Areas should be included within the landscape character and views policy, or whether they would be better addressed in a Biodiversity policy or are adequately addressed in other parts of the development plan.</p> <p>Criterion 2 of the policy seeks to protect a large number of locally significant views. It would be helpful to provide some more information to support the designation of particular views. For example, views of St Cuthbert’s Church are clearly significant and important as they seek to protect views of an important land mark building. However, other views identified and listed would benefit from a short description to explain why the view is valued locally and warrants protection.</p>
<p>Policy 3 – Local Green Spaces and Protected Open Spaces</p>	<p>It is not clear in the policy or supporting text why the plan seeks to designate some areas as Local Green Spaces and others as Protected Open Spaces. Are the three areas proposed as protected open spaces not appropriate for Local Green Space designation? Further explanation should be provided to help the reader understand why certain open spaces warrant Local Green Space Designation and others do not.</p> <p>The Local Green Space identified as Wooded Area along the western and eastern sides of Shipwrights Way/Staunton Way (HCC Bridleway 24) (from Whichers Gate Road to The Drift) is quite significant in size. It would be helpful to provide further justification to demonstrate why this is not considered to be an extensive tract of land, as this may be picked up by the Examiner during Examination.</p> <p>The justification for designation of Local Green Spaces set out in the table on page 25 and 26 does not need to be in the main Neighbourhood Plan document; it could be included as an appendix or referred to as supporting evidence.</p>
<p>Policy 5 Housing Design and Local Character</p>	<p>Is the intention of the policy to inform the design of all development? As currently drafted the policy refers to development and therefore would be applied to all development which would align with the plans objective to ‘improve the quality of the built environment through high quality design’. If this is the intention of the policy the policy title should be amended to remove the word housing.</p> <p>Criterion 1 of the policy does not offer anything in addition to the second part of the policy. If the second criterion of the policy is applied it will result in achieving high standards of design which respect the character and identify of the surrounding area. Further consideration should be given to the wording of Policy 5.</p>
<p>Policy 6 – Over 55’s Housing</p>	<p>It is unclear how this policy will offer anything more than existing policy in the East Hampshire Joint Core Strategy and South Downs Local Plan. Further consideration should be given to whether this policy is necessary.</p>



	The evidence to support this policy appears to be the Housing Needs Survey from 2018. Has there been a more recent update or is there more recent evidence available to support the intention of this policy.
Map 16	Map 16 shows the Settlement Policy Boundary, however, it doesn't seem to be referenced in any policy or supporting text. The RCNP doesn't seek to amend or set a Settlement Policy Boundary so it is unclear as to why it is included. It may be more appropriate to include it at the beginning of the document and include the boundary on the policies map.
Policy 7 – Rowlands Castle Village Centre	It is unclear how this policy will offer anything more than existing policy in the East Hampshire Joint Core Strategy and South Downs Local Plan. If the plan intends to ensure the ongoing vitality and viability of the village centre it should set out what type of development / facilities would be supported and seek to protect any particular facilities which are important locally. Further consideration should be given to the change in use class system and this should be referenced in the supporting text so it is clear where the policy can influence development, in particular the change of use of existing retail or commercial premises. Criterion 4 of the policy will not be necessary if the Housing Design and Local Character Policy (5) is amended as suggested above.
Policy 8 – Parking	Reference to the South Downs Parking Supplementary Planning Document should be included in the relationship to other policies section. The first two criterion of the policy are not necessary as they duplicate existing development plan policy as set out in the South Downs Local Plan and Joint Core Strategy. Criterion 4 of the policy is not necessary if the modifications to policy 5 are made as set out above. Further consideration should be given as to whether the remaining policy is necessary. If there is inadequate provision for parking at Links Close (Criterion 3) further consideration could be given to allocating land to meet that need.
Policy 11 Walking, Cycling and Horse Riding Access	As currently drafted Criterion 2 of the policy is not clear. If the policy is seeking to encourage new and improved links to the Shipwrights Way, Monarchs Way, Staunton Way, Sussex Border Path and E9 (European long distance path) the word 'promote' in the policy criterion is unnecessary. Criterion 3 of the policy seeks to require all developments to protect and where possible enhance the existing rights of way network. This seems excessive as some forms of development, small household extensions for example, would not be expected to enhance the right of way network. The addition of the term 'where appropriate' could be applied as in other policies in the RCNP.
Appendices	Recommend removing the appendices and presenting these as separate documents. References in the supporting text of policies can be used to signpost to relevant information where appropriate.
Appendix 1 – Aspirations	This part of the plan is clearly setting out important local matters which cannot form part of the development plan. It is possible to include aspirations or community actions within the neighbourhood Plan as long as they are clearly identified as community aspirations or actions. It may be possible to include some of these matters in the main body of the neighbourhood plan at the relevant section. However, many of the points listed are not community aspirations or community actions and would be better included in a community feedback section or an analysis of community issues which led to the formation of the vision and



	<p>objectives. Many Neighbourhood Plans have incorporated these types of issues in the introductory part of their neighbourhood plan, to reflect community feedback. Appendix 1 should be reviewed to identify any specific community actions / aspirations which could be included in the RCNP (clearly identified as community aspirations or actions and not policies) and other matters removed or included in a more appropriate section of the RCNP.</p>
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