

23 March 2023

Jenny Wood
Principal Policy Planner

By email only

Dear Jenny,

SDNPA response to Submission version of the Rowlands Castle Neighbourhood Development Plan consultation

Thank you for consulting the South Downs National Park Authority (SDNPA) on the Submission version of the Rowlands Castle Neighbourhood Development Plan (NDP). We would like to recognise and thank the Parish Council for all the work they have done on the NDP. Please find attached our detailed comments.

Please could you email me to confirm safe receipt.

Yours sincerely



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Chief Executive: Trevor Beattie

South Downs National Park Authority (SDNPA) response to the Rowlands Castle Regulation 16 Neighbourhood Development Plan

The comments set out below are the views of individual officers under the Delegated Powers of the South Downs National Park Authority (SDNPA).

All text to be added is underlined, all deleted text is ~~struck through~~.

Ref	Comment	SDNPA Recommendation to Examiner
General Neighbourhood Development Plan (NDP)		
General comment – Submission NDP	Paragraph numbers only appear to be used in the intro section it would help if these were used throughout the document to assist with referencing certain parts of the plan	Please include paragraph numbers
Vision and Objectives		
	Reference to SDNP in objectives in particular bullet point 3. This could also usefully include reference to the setting of the National Park as this will be of particular relevance to Rowlands Castle.	Include a specific reference to the National Park and its setting in the objectives of the RCNP.
NDP Objectives / Policy Objectives	The NDP includes a set of overall plan objectives and individual policy objectives. The policy objectives sections seem to act as an introduction / policy context. Consideration should be given to how these different objectives relate to each other. Some policy objectives do not appear to be drafted as objectives, for example Parking Policy Objectives or the first three policy objectives for the LGS policy.	Provide further clarification on the relationship between overall plan objectives and policy objectives.
Policy 1 – Gaps between settlements		

Ref	Comment	SDNPA Recommendation to Examiner
Policy Clause 1.	Planning Practice Guidance states that NDP policies should be drafted so they are concise, precise and supported by appropriate evidence. This policy wording could be more focused by removing reference to justification for the policy which is covered by supporting text.	The integrity of the predominantly open and undeveloped character of the gap between Rowlands Castle and Havant, as shown on Map 2, will be retained and protected to prevent coalescence, <u>and</u> retain the identity of the separate settlements, protect the landscape and ecological features, and protect the important sequential views which unfold when travelling along the roads and railway between Havant and Rowlands Castle
Policy 1 – Gaps between settlements Map 2 – Gaps between Settlements	Unclear whether the extent of the gap is necessary, does it need to go beyond the railway which offers an existing barrier to coalescence with Havant? The most south easterly part of the gap does not seem to relate to coalescence with the settlement of Havant which is more to the south of RC. The evidence paper suggests that areas have been excluded from the gap if ‘development would not lead to coalescence’. Therefore, it is unclear why the tract of land to the southeast of the settlement is included in the gap. This may be justified by other objectives of the policy such as the protection of important landscape or ecological features or important sequential views. If this is the justification it would be helpful if this was set out in the supporting text.	Consider the inclusion of supporting text to provide justification for the extent of the gap, and make clear why different parts of the gap may be considered appropriate for different reasons as set out in the objectives of the policy.
Map 2 – Gaps between settlements	As currently presented the map does not clearly show the location of the main settlement of Rowlands Castle. It would be helpful for the reader, in particular, those not familiar with the parish to understand the location of the settlement in relation to the gap	Include a map which clearly shows the wider settlement of Rowlands Castle and the area to the South (Havant) so it is clear how the policy is seeking to prevent coalescence.
Policy 2 Landscape Character and Views		

<p>Policy 2 – Landscape Character and Views</p>	<p>The policy as currently drafted is quite long and complex to reference. For example, the first part of the policy requires the reader / decision taker to reference how development proposals have been informed by key evidence documents and more generally how they will conserve and enhance key features which contribute to character. It may be possible to draft the policy so it is more precise and concise and still achieves the same policy objectives.</p> <p>The final sentence of policy clause 2 could be removed from the policy and placed in supporting text</p>	<ol style="list-style-type: none"> 1. Development proposals should, where appropriate demonstrate how (i) the Rowlands Castle Local Landscape Character Assessment (2012) and (ii) the broad management objectives and development considerations set out in the Rowlands Castle Settlement Character Assessment (September 2020) have been used to inform the design. <u>In particular they should their design has been informed by the Local Landscape Character Assessment and Settlement Character Assessment:-</u> 2. Development proposals should seek to: <ol style="list-style-type: none"> a. Conserve and, where possible, enhance these features that contribute to the character, visual quality, pattern and evolution of the landscape; <u>and</u> b. Respect natural features. 3. Development proposals likely to affect any of <u>which will impact</u> the locally significant views listed in Table 1 and shown below should assess their impact on the view(s) and show in sufficient detail how the proposal would alter the view. Development proposals will only be permitted where they do not result in a significant adverse impact. Details of the key features for each view are provided in the Rowlands Castle Neighbourhood Development Plan: Locally Significant Views Report (August 2020)
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Policy 2 – Landscape Character and Views	Given that a significant area of the parish falls within the National Park (over 50%) the policy could usefully include reference to conserving and enhancing the landscape of the National Park and its setting, as set out in the NPPF.	Consider an additional policy clause to reference the importance of conserving and enhancing the landscape character of the South Downs National Park and its setting.
Policy 2 – Landscape Character and Views	It is unclear from the information provided whether the views A5 and A6 are actually within the Parish of Rowlands Castle. On review it would appear that the views as identified on the map are taken from outside the plan area. Policies of the RCNP should only be applied to the designated neighbourhood area, therefore these two views should be removed from the policy	Consider removing views A5 and A6 which fall outside the designated neighbourhood area.
Policy 3 Local Green Spaces and Protected Open Spaces		
General comment	It would be helpful for the reader / decision maker if the Local Green Spaces and Protected Open Spaces were referenced with a number if letter to allow specific sites to be referenced in decision making.	Consider including reference numbers or letters to allow individuals Local Green Spaces or Protected Open Spaces to be referenced directly
Policy 3. Local Green Spaces and Protected Open Spaces	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 twelve 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. Some of the areas which appear to have been identified as Protected Open Spaces seem to warrant consideration as Local Green Space, it would be helpful to understand in supporting text why there are two approaches to protecting important open spaces.	Consider providing further clarification on the designation of protected open spaces and how these areas will be considered differently to Local Green Spaces.

Ref	Comment	SDNPA Recommendation to Examiner
Local Green Space - Wooded Area along the western and eastern sides of Shipwrights Way/Staunton Way (HCC Bridleway 24) (from Whichers Gate Road to The Drift)	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) appears to be quite extensive in size. It would be helpful to provide further justification to demonstrate why this is not considered to be an extensive tract of land. The supporting evidence only responds to this question with a yes or no, further explanation would help to justify this particular Local Green Space's inclusion.	Consider providing further information to justify the inclusion of Local Green Space 'Wooded Area along the western and eastern sides of Shipwrights Way/Staunton Way (HCC Bridleway 24) (from Whichers Gate Road to The Drift)'
Compliance of Local Green Space designations with NPPF (2021) Paragraph 102 - Table	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.	Remove Local Green Space assessment table to an appendix or link to the appropriate evidence base.
Policy 5 - Design & Local Character		

Ref	Comment	SDNPA Recommendation to Examiner
Policy Clause 1.	It is unclear how 'highest standard of design' would be assessed. Neighbourhood Plan policies should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence. This part of the policy could be difficult to apply consistently. Some minor modifications to the policy could resolve this issue and ensure the policy is concise and precise	<p>The following modifications are suggested to ensure the policy can be applied consistently:</p> <ol style="list-style-type: none"> 1. Development proposals should <u>will be supported</u> where they meet the highest standards of design, <ol style="list-style-type: none"> i. make a positive contribution to the local settlement character; and ii. are <u>be</u> informed by their setting within the landscape; and iii. contribute to maintaining a strong sense of place. 2. The <u>Development</u> proposals should demonstrate how applicable principles contained within the Rowlands Castle Village Design Statement (2000, 2019 1st Rev), Rowlands Castle Settlement Character Assessment (2020), Rowlands Castle Conservation Area guidance leaflet (EHDC) and Rowlands Castle Local Landscape Character Assessment (2012) have informed the design.
Policy 6 – Over 55s' Housing		
General comment	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.	Consider whether this policy is necessary and if it is distinct and reflects and responds to the unique characteristics and planning context of the parish
Policy 7 – Rowlands Castle Village Centre – Non-Residential Development		

Ref	Comment	SDNPA Recommendation to Examiner
General Comment	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.	Consider whether this policy is necessary and if it is distinct and reflects and responds to the unique characteristics and planning context of the parish
General Comment	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.	Consider supporting text to assist the reader in understanding how the use class system can allow for change of use in certain situations without planning permission
Policy 11 - Walking, Cycling and Horse-Riding Access		
Map 17 & Map 18	The maps supporting this policy clearly provide some geographical / spatial information relating to the policy, but they are not referenced in the policy itself. Should the maps be referenced in the policy so it is clear where the policy should be applied?	Consider reference in Policy 11 to the maps supporting the policy.