

Policy	Comment	Policy/ Section Reference Suggested Action	NPSG Comments
			suggestion of East Hants District Council that table was removed and the Spaces were listed in the Policy itself.
Policy 6 – Over 55’s Housing	The approach taken in the policy is very appropriate. However, does it add any parish-value to national and local planning policies?		<p>The Rowlands Castle Housing Needs Survey 2018 identified a surplus of large 4+ bedroom properties and an undersupply of over 55’s housing of 1–2-bedroom properties in the Parish.</p> <p>This Policy is designed to actively encourage the repurposing of the surplus larger 4+ bedroom houses to 1–2-bedroom units designed for over 55’s to meet the needs of the Parish.</p> <p>National and Local Planning Policies have not provided for this as evidenced by the lack of provision for this type of housing in new developments in Rowlands Castle over the last 10 years.</p> <p>Without this policy it is likely that the needs of the wider National or Regional Markets will continue to dominate and the Neighbourhood Plan will, in this respect, not have responded to the unique needs of the Parish and its residents in this area.</p> <p>This policy adds parish-value to national and local planning policies by stipulating <i>where</i> this housing should be encouraged, i.e. ‘within a reasonable walking distance to the main village facilities around the Green’.</p>
Policy 7 - Rowlands Castle Village Centre	I looked carefully at the village centre during the visit. The definition of the village centre in Map 16 was clear in visual and historic terms. The supporting text comments that ‘the community is committed to retain the vitality and viability of the centre and this policy sets out some overall requirements for development. The policy is intended to improve the quality of the built environment,	Might the second part of the policy generate planning applications for the use of the residential premises on The Green for retail and/or commercial purposes? If so, how would such proposals relate to the wider objective of the policy?	The current nature of the properties around The Green are both retail/commercial comprising Public Houses, Veterinary Practices, Doctors Surgery, Pharmacy, Hardware, Car Servicing, Café etc together with residential which forms an interesting, if slightly eclectic mix, but clearly serves the local community.

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	<p>contribute to the overall character of the village, promote a village that functions as a single community, and helps to enhance community life with the retention of business activities and facilities.' This is entirely appropriate.</p>		<p>Although parts are mainly commercial and others residential the varied mix adds to the character of the Village Centre that all parties wish to retain.</p> <p>To maintain a successful Village Centre there needs to be encouragement for new businesses, not just protection of important existing businesses. If some residential units change their use to commercial this is likely to be because of meeting local needs, this will add to the overall mixed-use character of the Centre, it is an integral part of the policy and is welcomed.</p> <p>The Village centre with its mixture of businesses meeting local needs is probably the key attraction for residents of the parish, its continual viability by supporting all existing and new commercial businesses is a key objective of the policy.</p> <p>We would welcome the Examiner's advice on the possible addition of further text to support this policy.</p>
Representations	<p>Does the Parish Council wish to comment on any of the representations made to the Plan? I would find it helpful if the Parish Council commented on the representations submitted by:</p> <ul style="list-style-type: none"> • East Hampshire District Council (Representation 9); • Shorewood Homes Limited (Representation 4); and • South Downs National Park Authority (Representation 12). 		<p>Separate comments have been included below:</p> <p>East Hampshire District Council – p4</p> <p>Shorewood Homes Limited – p21</p> <p>South Downs National Park Authority – p9</p> <p>Additional Response to Henry Adams (Representation 13) – p24</p>

East Hampshire District Council (EHDC) Comments on Reg 16 Version of Rowlands Castle Neighbourhood Plan

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General Comment	At Reg 14 stage EHDC suggested that paragraphs, tables and maps should be numbered consistently throughout the document. Whilst this has been implemented to some extent, the supporting text to the various policies is in some places difficult to distinguish from the policy objectives as the text does not have paragraph numbers. The only section of the plan to include paragraph numbers is the introduction.	Suggest the supporting text is preceded by paragraph numbers to aid interpretation and application. Under Policy 1 in particular, it is assumed the policy objectives are the bullet points, but there are non-bulleted paragraphs between these – so do these form part of the objective or are they supporting text/commentary?	The assumption that the five bullet points are the objectives of Policy 1 is correct. The non-bulleted paragraphs between these are text supporting the objectives. This could be clarified when implementing the suggestion to number all paragraphs throughout the Neighbourhood Plan.
Vision and Objectives	7 objectives are expressed under this section, then under each policy there are a series of policy objectives. How do the policy objectives relate to the overall objectives for the NP?	Clarify the relationship of the Plans objectives with individual policy objectives.	We agree that the relationship of the Plan's objectives with individual policy objectives could be clarified.
Settlement Policy Boundary	Map 15 differs to the adopted development plan policies map. Whilst there is no objection to the NP amending the settlement boundary to take account of recent developments etc. An explanation should be included as justification for making the changes. At present Map 15 differs and this could cause confusion when the NP is used in deciding planning applications. Also see comments below on Policy 6.	Clarify and justify the proposed changes to the settlement policy boundary.	The differences in the Map 15 SPB that were commented on by EHDC arose due to a mapping error - the intent of the RCNP is to use the SPB as defined in the adopted EHDC Local Plan. As an alternative to correcting Map 15, we would have no objection were it recommended to remove Map 15 and amend the policy wording to refer to the SPB as set by EHDC.
Policy I - Gaps Between Settlements.	Policy C11 of the East Hampshire Local Plan second review 2006 which originally defined the gaps was deleted and a commitment made under Policy CP23 of the Joint Core Strategy adopted 2014 to define the boundaries in future local plans (para 7.33), this however, has not yet been actioned. Therefore the extent of the gaps shown under Policy CP23 on the online mapping system are	The response to our Reg 14 comments on this matter are noted however, we consider our comments on the extent of the gap are still valid.	With regard to paragraph 7.33, it now seems justifiable and timely for this Neighbourhood Plan to define a 'Local Gap'. With regard to EHDC's Reg 14 comments about the extent of the 'Gap'. The 'Gap' in the Neighbourhood Plan is only approximately 30% of area of the 'Gap' currently defined in the East Hampshire District Council Local Plan, and it is similar in area to the

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	<p>those originally adopted but have not been reassessed as acknowledge under Policy CP23 para 7.33.</p>		<p>Horndean/Catherington/Clanfield' gap about 2.5 km to its north.</p> <p>The section below on page 17 headed 'Supplementary Comments to SDNPA – Policy 1 Gaps between Settlements' justifies the need for the inclusion of the areas to the east of the railway line in the 'Gap' by demonstrating how they each meet one or more of the five objectives of the Policy, one of which relates to the avoidance of coalescence of the Policy. The paragraphs draw upon and supplement the contents of the 'Policy 1 - Gaps between Settlements Evidence Paper'</p>
<p>Policy 3- Local Green Spaces and Protected Open Spaces</p>	<p>The wooded area along the western and eastern sides of Shipwrights Way/Staunton Way – this is a designated SINC and is therefore already protected under Policy CP21 JCS.</p> <p>Protected open space appears to cover a range of parcels of land, some of them very small and which most likely originated from the original planning permission for the developments and are unlikely to be considered suitable for development in the future. Some of these also have protected trees on them, which would also restrict any development potential.</p>	<p>Reconsider the parcels of land identified as Local Green Space and Protected Open Spaces.</p>	<p>According to the EHDC iShares Interactive map, only the land to the western side of Shipwrights Way/Staunton Way is designated as a SINC (Oaklands Woodland – Site reference EH2047). The SINC designation sits at the lower end of the hierarchy of protected sites.</p> <p>Policy CP21 does not always protect a SINC from development. For example, the nearby Woodlands Avenue was constructed over the SINC 'Oaklands Meadow 1 & 2' – Site reference: EH0242. This was permitted on 24th March 2015 by EHDC Planning application: '30016/018 - Outline - 106 dwellings including 42 affordable dwellings, access off Whichers Gate Road'. Policy CP21 is in the EHDC Local Plan which was adopted in 2014. Designating this area as a 'Local Green Space' gives it an increased level of protection.</p> <p>As shown in section 8 on page 12 of the 'Policy 3 – Local Green Spaces and Protected Open Spaces Evidence Paper', the wooded area on the western side of the Shipwrights</p>

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			<p>Way is immediately to the south east of the site categorised as 'Developable' in the EHDC Land Availability Assessment (LAA) (September 2021) (reference 'RC-001') with a capacity of 51 dwellings. Part of this area is also in the SINC Oaklands Meadow 1 & 2' – Site reference: EH0242'. When the agent representing the owner of the wooded area to the western side of Shipwrights Way responded to this being designated as a Local Green Space, he also sent us a preliminary outline plan showing where dwellings could be on the developable site reference 'RC-001' which his client also owns. He informed us that this plan had been submitted to EHDC to demonstrate that it could be allocated in the emerging Local Plan and that it could accommodate 51 dwellings. The plan showed that some of these dwellings would be within the SINC. This further demonstrates that designating land as a SINC does not necessarily protect it from development. We were advised that it is quite usual for neighbourhood plans to recognise two different levels of open space – Local Green Spaces and Protected Open Spaces, and that the latter areas can cover areas of open space within a recent housing development. Accordingly, as shown in the 'Policy 3 – Local Green Spaces and Protected Open Spaces Evidence Paper' all such areas in recent developments are designated as 'Protected Open Spaces'. This provides them with an additional level of protection from development.</p> <p>Two areas of the land to the east of the wooded area on the eastern side of the Bridleway have been designated as 'Developable' in the EHDC Land Availability</p>

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			<p>Assessment (2021) and we understand that their owners are promoting them for allocation in the emerging EHDC Local Plan. Designating this attractive and valued wooded area as a Local Green Space, could also ensure that it would be retained if these sites are eventually developed. The two sites are:</p> <ul style="list-style-type: none"> • LAA/RC-003 – Mays Coppice Farm • LAA/RC-005 – Land South east of The Drift <p>We are also advised that there is no specified minimum area for land to be designated as a Local Green Space or Protected Open Space.</p>
Policy 6 – Over 55's Housing	The policy refers to the settlement boundary as established by the East Hampshire Local Plan – Second Review 2006 – this is incorrect the most recent local plan which defines settlement boundaries is the Housing and Employment Allocations Local Plan adopted in 2016 - download (easthants.gov.uk)	Suggest reference is removed to the local plan, to simply refer to”the Rowlands Castle Settlement Policy Boundary as shown on Map 15....” See comments above on settlement policy boundary and the need to justify the changes proposed through the NP.	We have no objection to Map 15 and reference to it being removed in line with the Settlement Policy Boundary comment above, and would welcome the Examiner’s advice on the best approach to take.
Policy 7 - Rowlands Castle Village Centre	The JCS identified Rowlands Castle as a small local service centre under the settlement hierarchy (para 4.11 of JCS). More specifically under policy CP8 of the JCS Rowlands Castle is not identified as falling into the categories of town centre; district centre or local centre. Therefore, at present there is no adopted defined centre boundary. The evidence listed for this Policy does not include an explanation as to how the extent of the village centre under Policy 7 has been defined.	Clarify how the village centre has been defined.	The extent of the village centre was adopted from physical inspection as to what parts could properly be included, particularly with respect to provision of local facilities. The Village Green was included in Map 16 of the Village Centre in the Neighbourhood Plan submitted for Regulation 14, but it was not included in Map 16 in the version of the Plan submitted for Regulation 15 because it is designated as a ‘Local Green Space’ in Policy 3, and inclusion in both policies 3 and 7 would provide conflicting and undesired guidance about The Green
Policy 8 - Parking	Each policy appears to list a set of policy objectives, it is unclear if this is the case for parking? Reference to the Hampshire Local Transport Plan – LTP4 Local Transport Plan Hampshire	Clarify policy objectives Consider revising the title of the policy to refer to retention of existing parking within the village centre.	No changes proposed at this stage as the wording covers the requirements of the RCNP, and the Settlement Character Assessment (SCA) provides clarification.

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	<p>County Council (hants.gov.uk) is in progress and is quite different to earlier versions, with a shift away from planning for vehicles to planning for people and places.</p> <p>Also the local transport plan does not form part of the development plan as it is not a spatial planning document, so there is no compliance issue with regard to the basic conditions.</p> <p>Previous comments on the detail of the policy still stand – if the purpose of the policy is to retain existing parking provision within the village centre then the title could be amended to reflect this.</p>	<p>If the policy is to only apply to the village centre then this needs to be referred to in the policy – suggested amendment: -</p> <p>Criterion 1 ‘Development proposing the change of use or loss of off-street parking within the defined Village Centre (see Map 16) will only be supported.....’</p>	<p>Off-road is an important issue to residents in the Parish in general, and not just limited to the parking Village Centre.</p>
Policy 10 - Community and Sports Facilities	This policy refers to the Recreation Ground which is also defined as Local Green Space under Policy 3.	Consider cross referring to Policy 3 to ensure the end user is aware of both.	We agree the policy could be amended to cross-reference to policy 3.
Policy 11 – Walking, cycling and Horse-Riding Access	See previous comments on Hants Local Transport Plan. Refer to maps 17 and 18?	Refer to maps 17 and 18 in the Policy	Agree that the wording could be amended to refer to maps 17 & 18.
Appendices	These should be separate documents – to include these would increase the length of the plan by another 100 plus pages from 59 pages without the appendices.		We will defer to the Examiner’s comments.

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	NPSG Comments
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	We agree that paragraph numbers could be included.
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.	Reference to the National Park setting is made elsewhere, will defer to the Examiner’s comments.
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	We agree that the relationship of the Plan’s objectives with individual policy objectives could be clarified.
Policy 1 – Gaps Between Settlements			
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	The text with ‘strike-through’ is included to reflect all of the policy objectives and not only the one relating to the prevention of coalescence.

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Policy 1 – 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.	As suggested, the section below on page 17 headed ‘Supplementary Comments to SDNPA – Policy 1 Gaps between Settlements’ justifies the need for the inclusion of the areas to the east of the railway line in the ‘Gap’ by demonstrating how they each meet one or more of the five objectives of the Policy. The paragraphs draw upon and supplement the contents of the ‘Policy 1 - Gaps between Settlements Evidence Paper’
Map 2	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.	It is agreed that Map 2 (Gaps between Settlements) could be extended to include a wider area of the Rowlands Castle Settlement, or an additional map could be provided to show that.
Policy 2 Landscape Character and Views			
Policy 2	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	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. In particular they should their design has been informed by the Local	This proposed modified wording appears reasonable and we agree that the changes could be incorporated.

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	<p>achieves the same policy objectives. The final sentence of policy clause 2 could be removed from the policy and placed in supporting text</p>	<p><u>Landscape Character Assessment and Settlement Character Assessment</u></p> <p>2. Development proposals should seek to:</p> <p>a. Conserve and, where possible, enhance those features that contribute to the character, visual quality, pattern and evolution of the landscape; <u>and</u></p> <p>b. Respect natural features.</p> <p>3. Development proposals likely to affect any of which will impact 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)</p>	
<p>Policy 2 – Landscape Character and Views</p>	<p>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</p>	<p>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.</p>	<p>The proposed additional policy clause references the importance of conserving and enhancing the landscape character of the National Park. This is in line with what we wish the policy to achieve so again we agree that the change could be included.</p>
<p>Policy 2 – Landscape Character and Views</p>	<p>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</p>	<p>Consider removing views A5 and A6 which fall outside the designated neighbourhood area</p>	<p>Noted that Viewpoints A5 and A6 are located in West Sussex, and fall outside of the Neighbourhood Plan area. This was recognised during drafting of the policy. However the locus of both images is within the NP area and it is this locus which we seek to protect from inappropriate development. In practice any developments of the foreground land that lies within West</p>

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	two views should be removed from the policy		Sussex would have to be of considerable elevation and would be opposed to other SDNPA landscape policies. In summary we believe that these views should remain in the policy.
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	At present Local Green Spaces and Protected Open Spaces are given a reference (e.g. KME1 to 7, and Woodlands Avenue 1, 2, 5) if there is more than one such Space on a map. We would welcome any guidance the Examiner may offer about any need to revise this numbering scheme.
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.	One of the Policy Objectives is: 'The Local Green Spaces, largely because of their more prominent locations, are of importance to the Rowlands Castle community as a whole, while the Protected Open Spaces are important to the immediate residents'. 'More prominent locations' are those with a much greater number of residents and others who will see or use them. For example, they are in the centre of a settlement (e.g. Rowlands Castle and Finchdean Village Greens), adjacent to a main road leading to the village (e.g. Whichers Common (adjacent to the B2148), War Memorial, Kings Stone) or adjacent to footpaths widely used by residents or others (e.g. the wooded areas along the Shipwrights Way). In contrast, Protected Open Spaces would be seen by or in the main used by, only residents of nearby roads. Typically, they are areas designated as 'Open Spaces' in recent housing developments. As such, they do not

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			<p>meet the higher threshold required for Local Green Spaces in NPPF (2021) paragraph 102. They would not, therefore, have the same level of protection.</p> <p>The above factors have been considered in the 'Policy 3 – Local Green Spaces and Protected Open Spaces Evidence Paper' when designating areas as 'Local Green Spaces' or 'Protected Open Spaces'</p>
<p>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)</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) 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</p>	<p>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)'</p>	<p>Section 8 (Wooded area along the western and eastern sides of Bridleway 24/Shipwrights Way/Staunton Way from Whichers Gate Road to The Drift) on pages 12 and 13 of the 'Policy 3 – Local Green Spaces and Protected Open Spaces Evidence Paper' provides a more comprehensive justification for designating the entire length of this area as a Local Green Space'. Reference can also be made to the NPSG comments on EHDC's response about this area.</p>
<p>Compliance of Local Green Space designations with NPPF (2021) Paragraph 102 - Table</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>Remove Local Green Space assessment table to an appendix or link to the appropriate evidence base.</p>	<p>This table was added to the main Neighbourhood Plan on the recommendation of our Planning Consultant. We were referred to another 'made' Neighbourhood Plan which included such a table. The 'Policy 3 - Local Green Spaces and Protected Open Spaces Evidence Paper' includes a similar table for each of the Local Green Spaces'. We would welcome any further guidance the Examiner may offer about where these tables should be placed.</p>

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Policy 5 – Design & Local Character			
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	The following modifications are suggested to ensure the policy can be applied consistently: 1. Development proposals should will be supported where they meet the highest standards of design, 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 design 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.	It is suggested that the criteria ‘highest standard of design’ contained within the policy clause would be difficult to assess and some minor modifications are proposed. These do not dilute the objectives of the policy and, if it is felt that the proposed wording will facilitate decision taking, we would agree with this suggestion.
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	The Rowlands Castle Housing Needs Survey 2018 identified a surplus of large 4+ bedroom properties and an undersupply of over 55’s housing of 1–2-bedroom properties in the Parish. This Policy is designed to actively encourage the repurposing of the surplus larger 4+ bedroom houses to 1–2-bedroom units designed for over 55’s to meet the needs of the Parish. National and Local Planning Policies have not provided for this as evidenced by the lack of provision for this type of

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			housing in new developments in Rowlands Castle over the last 10 years. Without this policy it is likely that the needs of the wider National or Regional Markets will continue to dominate and the Neighbourhood Plan will, in this respect, not have responded to the unique needs of the Parish and its residents in this area.
Policy 7 – Rowlands Castle Village Centre – Non-Residential Development			
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	The current nature of the properties around The Green are both retail/commercial comprising Public Houses, Veterinary Practices, Doctors Surgery, Pharmacy, Hardware, Car Servicing, Café etc together with residential which forms an interesting, if slightly eclectic mix, but clearly serves the local community. Although parts are mainly commercial and others residential the varied mix adds to the character of the Village Centre that all parties wish to retain. To maintain a successful Village Centre there needs to be encouragement for new businesses, not just protection of important existing businesses. If some residential units change their use to commercial this is likely to be because of meeting local needs, this will add to the overall mixed-use character of the Centre, it is an integral part of the policy and is welcomed. The Village Centre with its mixture of businesses meeting local needs is probably the key attraction for residents of the parish, its continual viability by supporting all existing and new commercial businesses is a key objective of the policy.

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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.	If there is a desire to clarify within supporting text how some changes of use do not require planning permission, we would have no objection. In respect of the other comments, we have included these under the general comments above.
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.	We agree that wording could be inserted referring to maps 17 and 18 in the Policy.

Supplementary Comments to SDNPA – Policy 1 Gaps between Settlements

The objectives of this Policy as stated in the Neighbourhood Plan are:

- To provide a clear break between the settlements of Rowlands Castle and Havant. This will maintain a ‘sense of place’ for residents of, and visitors to, the two settlements. When passing between the two settlements (by all forms of transport including via the B2148 (Comley Hill and Whichers Gate Road), B2149 (Durrants Road and Manor Lodge Road) and Prospect Lane) there should be a recognisable structure to the settlements, establishing in travellers’ minds that they have left one settlement before they arrive in another.
- To preserve the individual identity of Rowlands Castle and the integrity of the predominantly open and undeveloped land between it and Havant by preventing coalescence.
- Protect the important sequential views which unfold when travelling along the roads and railway between Havant and Rowlands Castle.
- Protect important landscape and ecological features of the land between Rowlands Castle and Havant.
- Retain the approximately 30% of area of the Gap currently defined in the East Hampshire District Council Local Plan which is open and undeveloped.

The table below summarises how the areas of the ‘Gap’ to the east of the railway line meet these objectives. The ‘Reference’ is to the paragraphs in the next section (Policy 1 Gaps between Settlements) which describes how each of these areas meets the objectives.

Area	Reference	Policy Objective				
		To provide a clear break between the settlements of Rowlands Castle and Havant.	To preserve the individual identity of Rowlands Castle and the integrity of the predominantly open and undeveloped land between it and Havant by preventing coalescence.	Protect the important sequential views which unfold when travelling along the roads and railway between Havant and Rowlands Castle.	Protect important landscape and ecological features of the land between Rowlands Castle and Havant.	Retain the approximately 30% of area of the Gap currently defined in the East Hampshire District Council Local Plan which is open and undeveloped.
The Slip	1.6	Yes		Yes		Yes
Bartons Copse	1.7	Yes	Yes	Yes	Yes	Yes
Land surrounding Comley Cottage	1.8	Yes		Yes	Yes	Yes
Land East of Comley Hill	1.9	Yes		Yes	Yes	Yes
Comley Bottom	1.10	Yes		Yes	Yes	Yes
Southleigh Forest	1.11				Yes	Yes
Southleigh Landfill Site	1.12				Yes	Yes

Policy 1 Gaps Between Settlements

- 1.1 With regard to the 'Gaps between Settlements' Evidence Paper section 3.4 ('Land on which development would not lead to coalescence'). This refers to the part of the current 'Gap' which is north west of the largest area of the current 'Gap', but which is not connected to it. To its east is Blendworth Common and it extends beyond the A3(M) where it adjoins Waterlooville Golf Course. The southern tip of this part of the 'Gap' is about 300m from the northern edge of the large area of the gap. Because of its distance from the remainder of the 'Gap' and from the boundary of Havant Borough, and because it does not adjoin any major roads, it would not meet the policy objectives of preventing coalescence with Havant, providing a clear break between the settlements of Rowlands Castle and Havant, or providing sequential views.
- 1.2 Another area of the current 'Gap' which has been excluded is that to the west of Manor Lodge Road (B2149) opposite St. John The Baptist Church and between Autumn House and The Former Rectory. It would be bounded to its west by the proposed Havant Thicket Reservoir which has also been excluded from the gap. Therefore, this small area would not be contiguous with any other part of the proposed 'Gap', and would not meet the policy objective of possible coalescence with Havant, and would not provide any sequential views while travelling along the roads between Havant and Rowlands Castle.
- 1.3 With regard to the extent of 'Gap' proposed in this Neighbourhood Plan, it should be noted that as stated in the Policy Objectives, it is only approximately 30% of area of the 'Gap' currently defined in the East Hampshire District Council Local Plan. It would be similar in area to the Horndean/Catherington/Clanfield' gap about 2.5 km to its north. Horndean and Clanfield are two parishes within the East Hampshire District, while the Rowlands Castle 'Gap' is between the East Hampshire District and Havant Borough.
- 1.4 Further coalescence between Rowlands Castle and Havant could arise from a proposed development within the Rowlands Castle parish. Response 10 to the Regulation 16 Consultation from Bryan Jezeph Consultancy shows that land at Mays Coppice Farm to the east of Whichers Gate Road (B2148) and to the south of the Rowlands Castle settlement, is being promoted for development and the EHDC Land Availability Assessment (2022) categorises this site (LAA/RC-004) as 'developable'. This increases the justification for the 'Gap' defined in the Neighbourhood Plan.
- 1.5 In response to the 'Suggested Action', the following sections 1.6 to 1.12 demonstrate how areas of the gap meet the Policy Objectives. The areas are those to the east of the railway line as suggested in the Examiner's Clarification Note, and these areas are shown on Map 10 on page 16 of 'Policy 1 - Gaps between Settlements Evidence Paper'
- 1.6 The Slip**
- a. The eastern boundary of this area is along Comley Hill (B2148) and because it is lined with trees it provides attractive sequential views immediately after travelling northwards from the border with Havant Borough towards the built-up Rowlands Castle settlement. Therefore, it supports these Policy Objectives:
- **Protect the important sequential views which unfold when travelling along the roads and railway between Havant and Rowlands Castle**
 - **Provide a clear break between the settlements of Rowlands Castle and Havant**
- b. As shown in section 10.1 (Bartons Copse and The Slip) on page 16 of the 'Policy 1 - Gaps between Settlements Evidence Paper' this area has particular landscape designations which require them to be protected. Therefore, it supports the Policy Objective to:
- **Protect important landscape and ecological features of the land between Rowlands Castle and Havant.**

Policy 1 Gaps Between Settlements

1.7 Bartons Copse

- a. The western boundary of this area is along the railway line between Havant and Rowlands Castle, because it is lined with trees it provides a sequential view immediately after travelling by train northwards from the border of Havant towards the built-up settlement of Rowlands Castle. It complements the setting of Bartons Green playing fields, which are in Havant Borough, on the opposite side of the railway line. Therefore, it supports these Policy Objectives to:
 - **Protect the important sequential views which unfold when travelling along the roads and railway between Havant and Rowlands Castle**
 - **Provide a clear break between the settlements of Rowlands Castle and Havant**
- b. Section 8.1 (Rowlands Castle Local Landscape Character Assessment) and Section 8.3 (Rowlands Castle Settlement Character Assessment) on page 11 of the 'Policy 1 - Gaps between Settlements Evidence Paper' both express the need for this area and others to be protected to avoid coalescence.
- c. The Southern boundary of this area is immediately adjacent to the northern boundary of the following site referred to in the 'Policy 1 - Gaps between Settlements Evidence Paper' section 3.3 (Land has been categorised as developable) on page 4:

'Site Reference LAA/RC-002 - Land North of Bartons Road and West of Crematorium – 51 dwellings – Area 3.7 Ha. EHDC planning application 53322/007 'Development of 61 dwellings, with associated private and communal amenity space, garages, parking, internal roads, pathways, sustainable urban drainage, landscaping and associated works was submitted for this site on 24th February 2022.

In turn, the southern boundary of this site is immediately adjacent to the northern boundary of the following site referred to in the 'Policy 1 - Gaps between Settlements Evidence Paper' section 3.1 (Completed Developments) on page 3:

'EHDC Planning application 4840/001 – erection of 55 dwellings – Land North of Eastleigh House Cottages, Bartons Road, Havant – Area 1.48 Ha - permitted February 2015 and now fully developed off Harrisons Way. It is immediately adjacent to the border with Havant Borough'

Together these two sites result in increasing encroachment on the 'Gap' as defined in the adopted Local Plan, leading to coalescence with Havant, and any development on Bartons Copse would further increase this coalescence. Including Bartons Copse in the 'Gap' supports the Policy Objective:
 - **To preserve the individual identity of Rowlands Castle and the integrity of the predominantly open and undeveloped land between it and Havant by preventing coalescence**
- d. As shown in section 10.1 (Bartons Copse and The Slip) on page 16 of the 'Policy 1 - Gaps between Settlements Evidence Paper' this area has particular landscape designations which require them to be protected. Therefore, it supports the Policy Objective to:
 - **Protect important landscape and ecological features of the land between Rowlands Castle and Havant.**

1.8 Land surrounding Comley Cottage

- a. As shown in section 11.0 (Ecological Features of land in the Gap between Rowlands Castle and Havant) on page 17 of the 'Policy 1 – Gaps between Settlements Evidence Paper' this land is a 'Network Opportunity Area' and so it supports the Policy Objective to:
 - **Protect important landscape and ecological features of the land between Rowlands Castle and Havant.**
- b. The western boundary of this area is along the railway line between Havant and Rowlands Castle, and because of its rural nature it continues the sequential view provided by Bartons Copse for passengers on trains travelling northwards from Havant towards Rowlands Castle. Therefore, it supports the Policy Objectives to:
 - **Protect the important sequential views which unfold when travelling along the roads and railway between Havant and Rowlands Castle**
 - **Provide a clear break between the settlements of Rowlands Castle and Havant**

Policy 1 Gaps Between Settlements

c. This land's eastern boundary is along Comley Hill (B2148) and because of its rural nature it continues the attractive sequential view provided by The Slip for those travelling northwards from Havant to the built-up Rowlands Castle settlement. Therefore, it supports these Policy Objectives to:

- **Protect the important sequential views which unfold when travelling along the roads and railway between Havant and Rowlands Castle**
- **Provide a clear break between the settlements of Rowlands Castle and Havant**

1.9 Land East of Comley Hill

a. The area between the eastern side of Comley Hill (B2148) and the edge of the Southleigh landfill site, extending from the border of Rowlands Castle with Havant to the southern edge of Comley Bottom, is designated as 'Priority Habitat Deciduous Woodland (England)' (See <https://magic.defra.gov.uk/MagicMap.aspx> (overlay: Habitats and Species /Habitats/Woodland/ Priority Habitat Deciduous Woodland (England))). Therefore, it supports the Policy Objective to:

- **Protect important landscape and ecological features of the land between Rowlands Castle and Havant**

b. The western boundary of this land is along Comley Hill (B2148) and because it is lined with trees it complements the setting of The Slip on the other side of the road, so the two areas together provide an attractive sequential view immediately after travelling northwards from the border with Havant towards the built-up Rowlands Castle settlement. Therefore, it supports these Policy Objectives to:

- **Protect the important sequential views which unfold when travelling along the roads and railway between Havant and Rowlands Castle**
- **Provide a clear break between the settlements of Rowlands Castle and Havant**

1.10 Comley Bottom

a. This area is designated as 'Priority Habitat Deciduous Woodland (England)' (See <https://magic.defra.gov.uk/MagicMap.aspx> (overlay: Habitats and Species/Habitats/Woodland/ Priority Habitat Deciduous Woodland (England))). Therefore, it supports the Policy Objective to:

- **Protect important landscape and ecological features of the land between Rowlands Castle and Havant**

b. The western side of this area is along Comley Hill (B2148) and because it is wooded it contributes to the attractive sequential view enjoyed when travelling northwards from the border with Havant towards the built-up Rowlands Castle settlement. Therefore, it supports these Policy Objectives to:

- **Protect the important sequential views which unfold when travelling along the roads and railway between Havant and Rowlands Castle**
- **Provide a clear break between the settlements of Rowlands Castle and Havant**

1.11 Southleigh Forest

As shown in section 10.2 (Southleigh Forest) on page 17 of the 'Policy 1 - Gaps between Settlements Evidence Paper', the part of the Forest within the 'Gap', Blackbush Hanger, has particular landscape designations which require them to be protected. Therefore, its inclusion in the 'Gap' supports the Policy Objective to:

- **Protect important landscape and ecological features of the land between Rowlands Castle and Havant.**

1.12 Southleigh Landfill site

This is no longer an 'active' landfill site, and it has been restored and is now in aftercare. It would therefore comply with the Policy Objective to:

- **Protect important landscape and ecological features of the land between Rowlands Castle and Havant**

Fowler Architecture & Planning (on behalf of) Shorewood Homes
Response to Rowlands Castle Regulation 16 Neighbourhood Development Plan

Reference	Comment	Recommendation to Examiner	NPSG Comments
Policy 6 -Over 55s' Housing			
Settlement Policy Boundary	<p>Our client's interests relate to a small parcel of land at the northern end of Links Lane, close to the junction with Bowes Hill.</p> <p>It has not been assessed in the Council's most recent Land Availability Assessment, but it is currently the subject of a planning application seeking outline permission for the erection of up to three dwellings (Application Ref: 21501/005).</p> <p>Under the previous Regulation 14 version of the Neighbourhood Plan (NP), our client's land was shown to be included within the proposed Settlement Policy Boundary for Rowlands Castle (see image overleaf). We responded to the Regulation 14 consultation outlining our client's support for the proposed Settlement Policy Boundary.</p> <p>Under the current Regulation 15 Version of the NP, our client's land has been omitted from the proposed Settlement Policy Boundary</p> <p>In summary, our client objects to the proposed Settlement Policy Boundary for Rowlands Castle.</p>	<p>Our client respectfully requests that the SPB be amended to reflect that presented at Regulation 14 stage.</p>	<p>The Neighbourhood Plan is not proposing any changes to the Settlement Policy Boundary and this proposal sits outside it. However, we would comment that the development proposed is for several large detached 4-bedroom houses on a 3.4-hectare site currently used as a paddock.</p> <p>This may meet National and Regional needs, but will not meet Parish needs as the Rowlands Castle Housing Needs Survey 2018 identified a surplus of 4+ Bedroom Houses and a shortfall of units for over 55's housing comprising 1-2 Bedrooms.</p> <p>In particular, the EHDC 'Housing Outside Settlement Boundaries Supplementary Planning Document' (Version to be adopted March 2023) includes in paragraph 3.17 the Section 1 '<i>Meets a community need or realises local community aspirations</i>' has a column headed: '<i>Source of Evidence required to demonstrate compliance (this should be the most recent data available)</i>'.</p> <p>The 'Meets a community need' section refers to 'Local housing needs surveys as part of Neighbourhood Plans'. The 'Application' column for this section states; 'That the proposal meets the housing need of the community of the nearest settlement to which the proposal relates'.</p> <p>For the emerging Rowlands Castle Neighbourhood Development Plan that EHDC made available for consultation from 13th February to 27th March 2023, a 'Housing Needs' survey was conducted in October and November 2018 via a questionnaire distributed to the 1,376 households in the Rowlands Castle Parish, and 376 responses were received. The Consultation Statement and Consultation Evidence Documents (Regulation 15) in Section 2.8 on page 8</p>

Reference	Comment	Recommendation to Examiner	NPSG Comments
			<p>gives the results of this survey. This indicates that over the next 15 years there will be a significant supply of existing 4+ Bed Large Houses because their owners would be selling, and a shortage of Flats/Apartments, 1-2 Bed Houses, Bungalows and Sheltered/Retirement Accommodation The Shorewood Homes proposal therefore provides good evidence of the need for Policy 6, to ensure local needs are met.</p>
Settlement Policy Boundary			
Settlement Policy Boundary	<p>The Parish Council themselves accept in the aforementioned document that “Opportunities for development, particularly within the existing settlement policy boundary are indeed limited”. With this in mind, the Links Lane site is a natural and logical location for a small residential scheme, which could be brought forward quickly. It currently stands adjacent to the Settlement Policy Boundary for Rowlands Castle, outside the South Downs National Park, AONB and Conservation Area. It stands within flood zone 1 and is not located close to any listed buildings. In terms of sustainability, Rowlands Castle is served by the No. 27 bus service, which provides a frequent weekday bus service between Rowlands Castle and Emsworth. The nearest bus stop (for this particular service) is approximately 900m from our client’s site, off Redhill Road to the south east. Rowlands Castle is a highly sustainable location, and Links Lane benefits from both streetlighting and a footway. Within walking distance of our client’s land are number of services and facilities, including: • Primary school; • Nursery school; • Public houses; • Golf club; • Convenience store; • Village hall; and, • Recreation ground It is also noteworthy that under the current outline planning application that no objection has been raised by either Landscape or Environmental Health, and the</p>	<p>Our client respectfully requests that the SPB be amended to reflect that presented at Regulation 14 stage.</p>	<p>There was an error in producing the Regulation 14 version of the Settlement Policy Boundary and as a result this incorrectly showed the boundary as including the land subject to the representation, this was corrected in the Regulation 15 version. The Neighbourhood Plan is not proposing, nor have there been any consultations, on a change to the Settlement Policy Boundary. The correction also accords with comments from EHDC which are published on the EHDC planning web site. The Shorewood Homes land is therefore outside the current Settlement Policy Boundary and there are no proposals in the Neighbourhood Plan to change this. In addition, because the site is outside the SPB it is regarded as ‘Countryside’ development and so EHDC Local Plan Joint Core Strategy Strategic Policy CP19 (Development in the Countryside), and EHDC Local Plan Second Review saved policy H14 (Other housing outside Settlement Policy Boundaries) apply. In this respect we would comment: The site is outside the Rowlands Castle Settlement Policy Boundary, so it is regarded as ‘Countryside’ development. The application does not demonstrate that there is a need for the proposed dwellings to be developed in the countryside for purposes such as farming, or that it meets a community need.</p>

Reference	Comment	Recommendation to Examiner	NPSG Comments
	<p>Planning Policy Team noted that “It is noteworthy that the proposal adjoins the SPB, but rather than protrude extensively into the countryside, it would connect SPB to SPB on the eastern side. Development at this location wouldn’t cause creep of the village further into the depths of the countryside, as the SPB continues to the east further north, but its green nature does help with the gradual transition from countryside into the settlement”..</p>		<p>Therefore, the application does not comply with:</p> <ul style="list-style-type: none"> • EHDC Local Plan (JCS) policy CP10 (Spatial Strategy for Housing) • EHDC Local Plan (JCS) policy CP19 (Development in the Countryside), or • EHDC Local Plan Second Review policy H14 (Other housing outside settlement policy boundaries). <p>We further understand that the provision of new Housing Land outside the Settlement Policy Boundary is a Strategic Policy, reserved for EHDC, and the new Local Plan that is under preparation.</p>

Additional Responses to Statutory Consultees
Rowlands Castle Regulation 16 Neighbourhood Development Plan

Reference	Comment	Recommendation to Examiner	NPSG Comments
Henry Adams			
Policy 2 – Landscape Character & Views Locally Significant View - Table 1 & Accompanying Maps	<p>Having examined the identified photographs and maps illustrating the views in the draft NP there appears to be some inconsistency in the published materials. This is in relation to the context presented in photographs B1 to B3, which do not appear to match the marked viewpoint locations or direction. Please see more detailed comments below:</p> <ul style="list-style-type: none"> • B1: this photograph looks to be from the PRoW, but if it is assumed that this is intended to be from the PRoW it is marked somewhat to the east and is also 2 fields too far north. The description does not specify the receptor type. Direction of view is correct. • B2: this looks to be marked too far south on the plan, and from aerial analysis should instead be just north of B1, given tree locations and gaps in vegetation etc. It is assumed that this is intended to be from the PRoW but the description does not specify. Direction of view is correct. • B3: the view location is correct, but this photograph is orientated looking north, not north-east as marked or described. 	It is recommended that these are checked and amended to ensure that the viewpoint directions and corresponding photo images are correct.	We agree with the comment on view B1, but do not agree with the comment on B2 though the view locator could be better placed on the PRoW for clarity. We do not agree with the comment on B3 – the marked view line is considered to be correct within a couple of degrees.