

**Rowlands Castle Parish Council**

**Rowlands Castle Draft  
Neighbourhood Plan –  
Regulation 15 Consultation**

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## **1 Introduction**

- 1.1 This representation provides a response to the Regulation 15: Neighbourhood Plan Consultation and will provide a written comments on policies 1-3 of the Draft Rowlands Castle Neighbourhood Plan (NP). There are no comments in relation to the other policies within the NP.

## **2 Comments on the Draft Neighbourhood Plan**

### **Policy 1 – Settlement Gap**

- 2.1 Policy 1 of the NP seeks to maintain the integrity of the predominantly open and undeveloped character of the gap between Rowlands Castle and Havant. The supporting East Hants and Rowlands Castle Landscape Studies highlights the landscape and ecological qualities of the gap the importance between retaining distinction between the more urban area of Havant and the village of Rowlands Castle. The retention of the integrity of the gap as set out in this policy is supported.

### **Policy 2 – Landscape Character & Views**

#### **Locally Significant View - Table 1 & Accompanying Maps**

- 2.2 Policy 2 of the NP considers the landscape character and views within and to/from the Parish. The Policy requires that development should demonstrate how the Rowlands Castle Local Landscape Character Area has been used to inform the design of any development proposals, in particular the conservation and enhancement of characteristic features, visual quality, and pattern and evolution of the landscape.
- 2.3 This policy refers to the consideration of potential impacts upon identified 'locally significant views', including sufficient detail on how the proposal would alter the view and confirms that development will only be permitted where it does not result in a significant adverse impact. It is recommended that this sentence is expanded to refer specifically to "significant adverse impact on the landscape character" and its qualities so that it is more precise when considered in the development management process.
- 2.4 It is important to bear in mind that any new development on land, particularly undeveloped land, whether allocated within the next iteration of the East Hants Local Plan or speculative development, will almost always cause a change in the landscape character, as it is not possible to mitigate for the loss of such land and its replacement with built form. However, it is usually possible to mitigate or reduce levels of adverse effects on views through good quality design and landscaping measures, which can help to visually integrate development into the receiving landscape. It is therefore recommended that the wording of the policy is expanded, to take into account instances where there are changes to the landscape character or views, that there would be a requirement to demonstrate a landscape led approach to mitigate any harmful impacts on landscape character.
- 2.5 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:

- 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 some way 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.

2.6 It is recommended that these are checked and amended to ensure that the viewpoint directions and corresponding photo images are correct.

### **Policy 3 – Local Green Spaces & Protected Open Spaces**

2.7 Policy 3 lists a number of Local Green Spaces and Open Spaces which are to be protected and, if appropriate, enhanced for their existing biodiversity or recreational uses. In the commentary for this policy it is stated that Local Green Spaces, largely due to the prominence of their location, are important to the Rowlands Castle community as a whole.

2.8 Map 9 shows various Local Green Spaces, including a vertical linear wooded area along the western and eastern sides of Shipwrights Way/Staunton Way. The accompanying table text comments that this area provides users of the Bridleway with a sense of wooded rurality between Whichers Gate Road to The Drift, it is widely used by pedestrians, horse riders and cyclists and provides links to the village centre. This area also has high ecology value, as it is bound by SINC and Ancient Woodland.

2.9 Paragraphs 102-103 of the NPPF sets out the Government's planning policy requirements for the designation of Local Green Space within local and neighbourhood plans. The NPPF is clear that Local Green Space designation should only be used where the green space is:

- a) in reasonably close proximity to the community it serves;
- b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- c) local in character and is not an extensive tract of land.

2.10 Planning Practice Guidance then goes on to state what types of green areas can be identified as Local Green Space. This suggests the following should be considered:

*The green area will need to meet the criteria set out in paragraph 100 of the National Planning Policy Framework. Whether to designate land is a matter for local discretion. For example, green areas could include land where sports pavilions, boating lakes or structures such as war memorials are located, allotments, or urban spaces that provide a tranquil oasis.*

2.11 The wooded area to be designated as a Local Green Space as shown on Map 9 is considered to be an extensive tract of land that is wooded on either side, yet not particularly representative of the local character in Rowlands Castle. This area would not therefore meet the requirements of paragraph 102 of the NPPF in terms of designations of Local Green

Space. There is also considered to be limited justification within the accompanying table to this policy to demonstrate why this entire area is considered to be an area of suitable Local Green Space. In considering the planning practice guidance as to what sites could be considered suitable for Local Green Space designation, this land also does not meet any of the suggestions.

- 2.12 It is therefore suggested that further evidence would be required to justify this site's designation in relation to the national planning policy as this will be scrutinised in detail at the NP examination stage. It is also highlighted that the boundary of the Local Green Space at its northern extent, extends partly into The Drift, and it is unclear whether this is an error in the drawn boundary as this currently incorporates the access road.
- 2.13 The table commentary on page 27 of the NP relating to the Local Green Space along the western and eastern sides of Shipwrights Way/Staunton Way, refers to the area as a 'Ecological Network Opportunity Area' (ENOA). Reference to the ENOAs were removed from Policy 2 in this Regulation 15 version of the NP, as comments from a previous NP consultation highlighted that there was insufficient justification for inclusion of these areas in this policy and how they specifically related to the landscape character.
- 2.14 As there does not appear to be any other references to ENOAs within the Regulation 15 version of the NP, it is recommended that reference to the ENOAs is removed from the table on page 27.