

Rowlands Castle Parish Council

11 The Green, Rowlands Castle PO9 6BW

Email: clerk@rowlandscastlepc.org.uk Tel: 02392 413044 Website: www.rowlandscastlepc.org.uk

Response to EHDC’s Consultation on Strategic Design Policy (S27) of Emerging Local Plan – October 2021

Policy S27: Design and local character is introduced by an explanation of why it is needed (i.e. under the section ‘Why we need this policy’). What are your comments on this part of the policy?

The outward appearance of any development, large or small must be sympathetic to its surroundings both natural and man-made (i.e. buildings and other structures). Development design must support and encourage the use of walking and cycling as well as public transport/taxis to get to local destinations, while recognising that private vehicles are still the principal means of transport for many. Good settlement design in terms of layout and building appearance means that people will feel good about where they live and work because it is attractive, welcoming and makes them feel good about their environment. We have seen in the past how poorly designed and built structures drag down the look and feel of a place and make people feel less valued. A well-designed settlement and associated environment adds to a sense of well-being for the residents. In addition it is essential that design mitigates the climate change that will impact our lives adversely.

Policy S27 identifies a range of criteria for considering the design of development proposals when making a decision on planning applications. Using the table below, please identify whether you think each criterion is either; necessary, important or unimportant. Please only choose one option for each criterion. Please also provide comments to explain your answer and how you think it could be improved.

Criterion	Is it necessary?	Is it important?	Is it unimportant?	Please explain your answer & identify how it could be improved
a)	YES			New developments should never clash in appearance with existing buildings and structures but should provide a seamless transition so that change in appearance could be effected but slowly over distance so that there is no sudden shift in design. The exception can be where existing structures are poor and likely to be demolished and replaced or otherwise altered to redress their poor design and appearance. Then it makes sense to ignore what has gone before in order to build better for the future. This criterion could be improved by adding the greater elaboration provided above.
b)	YES			It is important to reduce the negative impact of humanity on the landscape and overall environment. We need to reduce the uses of resources that cannot be easily replaced and to ensure that society’s need for crime-free living and easy integration with existing communities are well to the fore of design thought. To improve this criterion you might add: ‘Sufficient low-energy lighting must be provided to allow women in particular to feel comfortable walking or cycling on their own at night and the routes must be open with no hiding places and seamless connection to neighbouring settlements’.

Criterion	Is it necessary?	Is it important?	Is it unimportant?	Please explain your answer & identify how it could be improved
c)		YES		It is self-evident that good quality, resilient and low embodied energy materials should be used for durability and be reflective of the local context to avoid clashes of appearance and style. The statement is clear and unambiguous and nothing needs to be added.
d)		YES		Good design, even of minor features, will always add to a locality's appearance. The development of so-called 'Metroland' in the 1920s and 30s used sensible and good designs of buildings and landscapes to build a very acceptable suburban landscape before the 'build it high and pack it in' approach took hold post WWII. Today, resource efficient and climate resilient buildings matter more than ever. It would be good to include the need for trees and shrubs in pockets within developments while not obscuring paths and cycleways from natural surveillance to maintain security. Building designs should be easy on the eye rather than impactful in terms of appearance; designs from earlier times can be enduring while incorporating materials and features to cope with climate change.
e)		YES		It is obvious that this statement is important; no-one would argue against it. Open spaces, where people can seek respite from the proximity of others and children can play in groups are important in today's increasingly crowded environment. Minimising opportunities for crime is ever more important to reduce the pressure on police forces and to allow vulnerable people to feel safe and comfortable when moving about. Nothing to add to what is clear and unambiguous.
f)		YES		Again, this statement is clearly of importance if new developments are to be successfully integrated into the environment, whether countryside or adjacent settlements. The cumulative impact of any new development must be carefully considered both in terms of ecology and appearance so the last sentence should contain the imperative 'must' rather than the more equivocal 'will be'.

Criterion	Is it necessary?	Is it important?	Is it unimportant?	Please explain your answer & identify how it could be improved
g)	YES			It is vital that dwellings are of a sensible minimum size that provides appropriate living space together with some useful outside space, either individual or communal depending on whether the properties are houses or flats. Privacy is important to people and overlooking must be avoided if at all possible unless suitable mitigation can be implemented.
h)		YES		Being able to store waste and recycling bins in a manner that does not intrude onto the street scene is as important as using good quality designs and providing space for people to move around comfortably. This is all part of making new places attractive to live and work in. Though in comparison to some aspects of new development this might seem unimportant we would argue not; all aspects of design and appearance contribute to the whole picture of a place.
i)	YES			Light pollution is both a waste of energy and a problem for the natural world that can be badly impacted by the presence of artificial light during the hours of darkness. It is necessary that all light emission from external and internal sources be minimised or avoided to preserve dark skies generally for the benefit of a wide variety of organisms. Outside lights should have low emissivity, be projected downwards and have a minimal impact beyond the immediate area where light is desired, e.g. paths and road junctions. For internal lights, skylight windows in particular must have integral blinds that can be easily closed by the building occupant at night to prevent light being lost upwards. In any case all internal lighting should be away from windows so that light spillage through the glass is reduced. Again, some of the sentences above could be incorporated into the criterion to provide it with some real impact.

j)	YES			<p>A lot of effort goes into producing neighbourhood plans, design statements and townscape/character assessments. It is therefore essential that developers take the guidance given in such documents and work positively to incorporate that guidance within the overall design of a new development. The setting and context of the South Downs National Park should also be considered even for developments outside the boundary but close to it i.e. in visual range of the boundary. This will allow a graduated approach to design that takes account of the National Park setting and building design within it when close by but allowing greater variation once away from the Park's boundaries. Words to this effect should be added to the criterion.</p>
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The implementation of Policy S27's criteria will be assisted by supporting text and by location-specific policies and guidance (where the latter has been prepared). The supporting text is provided within the section: 'Implementing the policy'. What are your comments on this part of the policy?

- This section (1st paragraph) includes: 'The criteria are intended to inform the design of new development proposals alongside more detailed or location-specific policies, design codes and guidance documents.' In order to successfully implement this part of the policy, the following would be required.
 - EHDC should produce a Supplementary Planning Document 'Design Guide' similar in scope and content to that submitted for consultation by the South Downs National Park Authority in July 2021. The only reference to 'Design Guides' in the Regulation 18 version of the emerging EHDC Local Plan is in the Glossary (Appendix 1) which states these are often produced by a Local Authority. It would be inconsistent and confusing for parishes which are partly within the SDNP to have a 'Design Guide' for one part of the parish and not the other. Such an EHDC Design Guide should be published by the time that the emerging Local Plan is adopted and, therefore, when Policy S27 would take effect. The following sentence which appears in this section (3rd para) for this policy states: 'Where the Council considers that further guidance is necessary to provide clarity on design expectations, design codes and/or supplementary planning documents will be prepared.' It should be clarified according to which criteria EHDC would determine if further guidance (including a Design Guide) would be necessary.
 - The required scope and content of 'location-specific policies' and 'design codes' must be clearly defined in the Local Plan to ensure consistency between the two and to avoid gaps and overlaps. For example, if there are conflicts between 'Location-specific policies' and 'Design Codes', it would be difficult for a designer to comply with both, and for a design to be assessed for compliance. It should also be stated who would write these documents. For example, for the Land East of Horndean development, it is the developer who has written the 'Design Code', but should that be the case for all developments? Would the Local Authority or Town or Parish Councils also write 'Design Codes'? Would 'Design Codes' have to form part of a Neighbourhood Plan if a Parish has one?
- This Parish Council welcomes the opportunity to have been consulted on the design aspects of the three sites in our parish which are being allocated in the emerging Local Plan, and this is in accordance with the spirit of the last paragraph in this section. So far, Parish Councillors have spent a total of about 70 hours preparing comments on just one of these sites. However, this paragraph does not state if and how our comments will be reflected in any document prepared by EHDC. Will they be included in a 'Location-specific policy' or in a 'Design Code'? If they are documented in the former, will a 'Design Code' be written, and if so, by whom. This must be specified in this section.

- The penultimate paragraph in this section ends with the following sentence:
'In implementing Policy S27, the Local Planning Authority will take account of the two purposes and duty of the National Park, as specified in the Environment Act 1995, where it is relevant to do so.'
For the avoidance of doubt, it should be indicated how it will be decided if 'it is relevant to do so'.
- This section focuses on implementing the 'Design and Local Character' policy. In addition, an enforceable process must be set up to ensure that a completed development has actually complied with 'Location-specific policies', 'Design Guides' and 'Design Guidance'. Otherwise all such documentation is likely to be ignored by those who have no wish to comply.

Having read Policy S27 and its supporting text, please give details of any additional guidance that you think should be given, to improve consistency with the design policies of your neighbourhood plan (where relevant) or the guidance of any village/parish design statement. (Please clearly identify the name of the neighbourhood plan policies or local guidance that you are referring to).

The emerging Rowlands Castle Neighbourhood Plan includes the following policy which is the most closely related to EHDC policy S27 (Design and Local Character):

Policy 5 - Housing Design & Local Character

1. Development in Rowlands Castle must meet the highest standards of design, respecting the character and identity of the surrounding area and be informed by its setting within the landscape. They should also contribute to maintaining a strong sense of place.
2. Development proposals will be supported where they make a positive contribution to the local settlement character and demonstrate how the 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 been taken into account.

Paragraph 1 of the Neighbourhood Plan and EHDC Policy S27 are consistent. The EHDC Policy would benefit from indicating that Settlement Character Assessments such as that referred to in paragraph 2 give Development Considerations and Broad Management Objectives for very specific local areas and this relates to criterion d). Here is a link to the Rowlands Castle Settlement Character Assessment:
<http://www.rowlandscastlepc.org.uk/wp-content/uploads/2016/07/2195-Rowlands-Castle-Settlement-Character-Assessment-20201102-Final.pdf>

The Rowlands Castle Village Design Statement is also very relevant to criterion d), but the 'Implementing this Policy' section states: '...to find out if there are village design statements or character studies that identify aspects of local character (criterion j)'. This implies such statements and assessments apply only to areas with the South Downs National Park, but that is not the case with the Rowlands Castle documents.

The 'Implementing this Policy' section also refers to Policy S18, and this could refer to Local Landscape Character Assessments such as the following:
<http://www.rowlandscastlepc.org.uk/wp-content/uploads/2017/07/RC-Local-Landscape-Character-Assessment-2012.pdf>