

Rowlands Castle Parish Council

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East Hampshire District Council Local Plan 2021-2040 Response to Public Consultation

RCPC is grateful for the opportunity to review the draft Local Plan and provide responses to the consultation. In view of the size of the document, councillors have decided to focus on matters of particular interest to RCPC; the responses on the main document below fall into 2 categories, strategic comments on overall policies/objectives and specific comments on individual sections and paragraphs. Comments and proposed additional text then follow on the 4 site allocations within the Parish.

THE FOREWORD

Strategic comment. Encouraging the use of local public transport is welcomed but with the expected loss of funding from HCC with regard to all routes that are not commercially viable (mostly in rural areas) the building of large amounts of housing out in the countryside as opposed to within or adjacent to existing settlements already serviced by public transport doesn't help. The priority for housing should be to re-use brownfield sites or redevelop empty offices and other business premises that do not seem to have a useful future for employment. Also, building needs to go up not just out and we need to develop low-rise (4-8 storeys) blocks of apartments. With an ever-increasing population the housing solution cannot just be to build on yet more green space that is important in its own right for farming and for recreation.

PART A – Planning for the Future of East Hampshire

02 Vision and Objectives

Page 25 – The Vision. Happy with the Vision but 'accessibility' and 'quality affordable homes' will be challenging to achieve and maintaining a supply of suitable land for development cannot be sustained for ever.

03 Managing Future Development

Page 31 - Objective A1. Strategic comment.

What happens when you run out of land? Isn't it time to go up rather than out into the countryside and therefore encourage low-rise (4-8 storey apartment blocks) in town centres close to amenities and public transport hubs. The Council should develop incentivising schemes for developers to utilise brownfield sites and ensure that even on quite small sites there is provision for first time or downsizing buyers.

Page 32 - Paragraph 3.8 states:

'The total unmet needs of neighbouring authorities are currently unknown, however, considering the landscape sensitivity associated with the National Park, there is potential for some unmet housing needs from within the South Downs National Park area'

At a meeting a couple of months ago with the SDNP Local Planning Authority officers, Parish Councillors were given a presentation of how the officers were determining the housing needs for their area via a HEDNA and this appeared to be well-advanced. EHDC should ensure that they consider any quantified estimate of SDNPA unmet needs in this Local Plan as soon as it is available. For example, it could be reflected in the Regulation 19 Publication Consultation or the Reg 22/23 Submission versions of the Local Plan.

Page 33 - Paragraph 3.11 states:

‘For the purposes of this Local Plan, no assumptions are made on the unmet needs of other neighbouring local planning authorities (with the exception of the SDNPA), but any homes surplus to the identified requirements could be attributed to any future identified unmet need, particularly in the South Hampshire sub-region’.

It should be clarified what is meant by ‘homes surplus to identified requirements’ and stated how it would be calculated. For example, would it be based on the number of windfall developments that had been completed at the time when an unmet need from a neighbouring authority was quantified? Would there be a method of forecasting any ‘homes surplus’ over the plan period?

Page 37 – Housing paragraph 3.12 states:

‘... that the minimum number of homes required in the Local Plan Area between 2021 and 2040 is 9,082 homes, equivalent to 478 homes per annum’.

RCPC observes that this will require a substantial amount of land each year but the supply of land is not limitless, hence the need to build up as well as out.

Page 43 - Policy S2 Settlement Hierarchy.

The hierarchy tiers are supported. (RC is in Tier 3 of 5).

PART B – GREENER PLACES

04 Responding to the Climate Emergency

Page 51 – Objective B4. Strategic comment.

Reducing the use of private vehicles requires good public transport but not just in built up areas or along corridors of habitation. If public transport is only to be provided along commercially viable bus routes then it makes sense to develop the majority of new dwellings adjacent to such routes or close to railway stations (albeit trains only provide transport to more distant destinations because of the gaps between stations).

Page 54 – Policy CLIM 1 Tackling the Climate Emergency. Strategic comment.

You must stop allowing building on flood plains/Flood Zone 3 and even in Flood Zone 2 in some cases unless dwellings are raised clear of the ground to allow water to flow beneath them in times of flooding. Flooding will be a regular occurrence from now on in many areas where it has only been seen occasionally and this must be recognised when allowing developments in or close to flood plains.

Page 62 - Paragraph 4.23. Strategic comment on the issue of renewable energy.

When the sun doesn't shine and the wind doesn't blow (both of which can occur together quite often) the generation of renewable energy drops very considerably. Also, not all locations are suitable for solar panels due to shading or aspect and wind turbines may be sheltered in the lee of buildings or trees. Therefore, while the reduction in demand for energy (heating) could be assisted through good construction it may not be possible to provide cost-effective on-site renewable energy and this must be borne in mind when assessing proposals for developments.

Page 73 - Policy CLIM 4 Renewable and Low-Carbon Energy. Strategic comment.

There is a need to exercise care with regard to the installation of solar panels on farmland to ensure that productive land used for the production of food is not lost in the pursuit of power generation. Too much of the countryside is being lost to large solar farms in the face of potential food shortages due to climate change effects such as flooding of fields and it is essential that a proper balance is maintained. There is a considerable risk of having a monoculture environment with excessive solar panel deserts. Loss of green space that enables mental health & wellbeing for urban populations (you can't walk through a field of solar panels) and loss of pasture for animals or fields for crops and vegetables. Where is the evidence that the energy return is worth the loss of agricultural land that is disposed of for a short-term gain of the sale price rather than holding it for the long-term gain of having sufficient food to feed the population? What is the strategy for solar panels on all existing & new industrial/commercial buildings and sites and where is it?

Page 78 – Paragraph 4.68.

Care needs to be taken with increasing tree cover to ensure that the right trees for the location are planted and that protection against squirrel damage to young saplings in particular is employed. In addition, new young trees need to be watered regularly to ensure that they survive heat waves until their root system is developed so that they can sustain themselves. Too often trees are planted to meet an obligation without ensuring proper aftercare resulting in many saplings dying.

Page 82 - Policy CLIM 5 Climate Resilience - Paragraph 4.65.

It is very important that new building does not take place in Flood Zone 3 unless measures such as raising the building on a platform above ground level are employed. Flooding will present a problem for many properties that would in past years not have been previously impacted by excessive rainfall and that have not been previously affected by flooding. It is necessary to ensure proper surface water drainage is planned for and implemented and that new developments and the surrounding land are able to cope with a large volume of rainfall over short periods, so as to prevent flash flooding. It will be essential to have a high percentage of permeable surface to allow water to soak away but also to have catchments able to absorb water when the ground is saturated.

05 Safeguarding our Natural and Built Environment

Page 89 – Policy NBE1 Development in the Countryside Paragraph 5.10.

There are often attempts to build new dwellings just outside a Settlement Policy Boundary (SPB) in the countryside using the argument that more housing is needed and the countryside adjacent to the SPB should be built on to achieve that. It is essential that there should be no

presumption of building new developments outside the SPB even on what appears to be unused or 'poor quality' land. Nature has a way of using all land that it can access and must not be denied areas of scrub, poor grassland or other similar areas just because it suits a developer to buy it and try to build on it. There must be a high hurdle and proof of dwelling need before any attempt at development should be considered.

Page 90 - NBE 1.1 f.

It would be useful to state that only an extension that is subservient to the existing building will be considered otherwise there will be attempts to get a major extension approved that would dramatically alter the mass of the existing property. Quite a few applications have been seen that where the applicant is trying this on. Sub-paragraphs f and j seem to be stating roughly the same thing so they could be joined together to get the message across re limiting the size of the extension.

Page 93 – Policy NBE2 Biodiversity, Geodiversity and Nature Conservation.

This policy is fully supported in that development proposals must ensure that biodiversity is retained and enhanced on the site submitted for approval.

Page 110 - NBE 7 Managing Flood Risk. Strategic comment.

This is a very important policy and developers must be held rigorously to account on every aspect of flood management as the rainfall will only get more intense as the world warms up. We need to be able to cope with very heavy prolonged periods of rain from time to time and all types of development and drainage must be able to cope with these challenging conditions.

Page 115 – Policy NBE 8 sub-para 4 - Water Efficiency Standard of not more than 95 l/p/d.

RCPC strongly supports this approach, it is possible to reduce individual use considerably when people think about their use of water and make conscious efforts to reduce it. Water is a precious and fairly expensive resource and using less of it not only conserves supply but also reduces waste water in sewers, thus reducing pressure on sewage works.

Page 121 - NBE 10 Landscape.

One key means of protecting landscape is to ensure that developers give priority to brownfield site development and that in town centres in particular, low-rise apartment blocks of up to 8 storeys high are constructed, thus reducing countryside loss and maximizing use of brownfield land close to transport hubs and various amenities. Village & rural locations should be protected from urban overspill, able to retain their character, yet be accessible so that they become 'mental health & wellbeing hubs' for urban and town populations.

Page 124 - NBE 11 Gaps between settlements.

These are essential to allow people to consider themselves living in a distinct area/settlement that they can have an affinity with and thus develop a sense of 'belonging' as opposed to living in a vast conurbation. Such gaps must be maintained by utilizing land to best effect within SPBs and recognising that productive farmland is essential to maintain the UK's independent food production requirement to be self-sufficient and that countryside for recreation is essential to the maintenance of people's physical and mental health.

Page 124 - NBE11.2.

It is suggested that the wording be changed to read 'Planning permission will be considered..... rather than 'granted'. The latter word implies there will be no problem in granting permission but subsequent paragraphs 5.81 and 5.82 actually imply that various factors will be considered in arriving at a decision.

Page 126 – NBE 12 Green and Blue Infrastructure. Figure 5.4.

This shows that Rowlands Castle has the opportunity for allotments. Allotments are already provided by Portsmouth City Council for their residents on Durrants Road that are also used by some residents of Rowlands Castle and it is not clear where additional allotments would be sited, albeit that some more plots would probably be welcomed.

06 Creating Desirable Places

Page 147 – Policy DES 1 Well-designed Places.

DES1.1 states "New development will be permitted where it would help to achieve the following design vision:"

There is a need to insert a new sub para that states that, where possible, new developments should be positioned close to public transport (bus routes and/or stations) to facilitate the reduction in use of private vehicles. (Reason - Cycling and walking connections are all very well but public transport is an essential component of people movement for medium and longer distance travel)

Page 155 - Policy DES2 – Responding to Local Character.

Paragraph 'b.' should also refer to Settlement Character Assessments, Local Landscape Character Assessments and Village Design Statements.

Page 162 - Policy DES3 Residential Density and Local Character.

High residential density should be supported within towns where brownfield sites are available for re-development.

PART C - VIBRANT COMMUNITIES

08 Delivering Green Connections

Page 184 - DGC1 Infrastructure.

Contributions by developers to local infrastructure elements are crucial to alleviate the impact of new homes and business on existing infrastructure that may be insufficient or unable to support increased use without improvements. The policy details on page 185 are supported so that the right infrastructure is put in place before residents or users take possession of dwellings or places of work.

Page 188 - DGC2 Sustainable transport - paragraphs 8.23 and 8.24.

There is a definite need to focus future developments on Tier 1 and tier 2 locations and as close as possible to the centres to ensure that walking and cycling can be used for short journeys. It will also place people close to bus routes and, in some cases, railway stations, to facilitate longer journeys. It must be recognised that putting new developments out in the countryside away

from public transport routes and hubs will inevitably cause most people to use cars as there is no alternative hence the increase of CO2 emissions. Brownfield developments with safe, easy to use transport routes (such as cycle paths) to town centres, together with improving access out to villages and rural spaces will protect unique locations, reduce dependency on cars and facilitate health & wellbeing for town & rural residents. It must be remembered that for shopping or other journeys where loads need to be carried the private vehicle will still be the most favoured means of moving from A to B but getting people to walk or cycle for short distances can make a difference.

Page 196 - Policy DGC3 New and improved community facilities.

If developers offer new facilities there should be some for both town and rural residents, with funding to support their initial operation, but also a recognition by the LPA that P&TCs may not have the financial resources to take over such facilities and that simpler solutions may be appropriate to support social and sports activities. Developers must be strongly encouraged to engage early with residents' representatives to understand community needs and provide reasonable solutions.

09 Homes for All

Strategic comment. It must be recognised that, in some areas, there really is not a large supply of land to build on and that in towns or urban areas there is a need to go up rather than out. Apartments blocks of between 4-8 storeys make a much better use of land than just building housing, even terrace housing with small gardens soon takes up considerable amounts of land. Also, elderly people living in large houses who need to down-size are finding it hard to get smaller properties because too great a proportion of new homes are larger 3 and 4-bedroom properties because they provide a greater return for developers. Bungalows and ground floor apartments need to be provided for both older people and those with specific mobility problems such as requiring wheelchairs. Overall, planners need to require a good proportion of new properties to be suitable for older people looking to downsize and for singletons and couples looking to buy or rent their first property and developers of even small sites need to recognise and act on the need to accommodate such needs.

Page 220 - Policy H1 Housing Strategy.

it is right that most of the housing be allocated to the Tier 1 and Tier 2 areas in the Settlement Hierarchy to ensure new dwellings are close to centres with a range of shops and amenities and that are also public transport hubs. The use of brownfield sites and those sites that are under-utilised within built up areas must be a priority. Within that overall strategy planners should encourage low-rise apartment blocks to maximise use of land rather than seeing an ever-widening loss of necessary countryside.

Page 221 – Implementing the Policy – paragraph 9.28 states:

‘Other mechanisms to meet the Local Plan Area’s housing needs are to resist proposals that result in the net loss of dwellings and to allow suitable homes in the countryside that are in line with Policy NBE1. Neighbourhood plans are also a useful tool to allocate further housing that achieves the vision and aspirations of specific communities.’

With regard to the last sentence above, this should require EHDC to inform those developing NPs of the number of houses required for the NP Designated Area and an additional sentence to that effect should be added afterwards.

Page 223 - Policy H2 Housing Mix and Type Paragraph 9.34.

It is agreed that the largest share of demand for new market homes is likely to come from households needing only two and three-bedroomed homes. In the affordable rental sector it is also agreed that the majority of the requirement is for one and two-bedroomed homes. It is essential that developers are only permitted to bring forward schemes that offer these sorts of properties in sufficient numbers, even for quite small developments. Developers seem interested only in building big expensive properties that do not meet the needs of many but which net them large profits. Developers need some financial incentivisation to build smaller dwellings, perhaps by reducing S106 and CIL payments required.

Page 225 – Implementing the Policy paragraph 9.41 states:

‘The Local Planning Authority recognises that future development will need to respond appropriately to local needs. Therefore, regard should be had to bespoke local housing need evidence relating to individual parishes, through the preparation of neighbourhood plans.’

This approach is encouraged because it is important that, when assessing planning applications, EHDC does consider any Housing Needs Survey results that are derived in the preparation of any Neighbourhood Plan

Page 228 Policy H3 Affordable Housing H3.1.

To meet the requirements covered in the previous paragraph it is proposed that the reference to “10 dwellings or more” be reduced to “5 dwellings or more” to enable more of the smaller properties to be built. If this is really regarded as unfeasible then at least reduce the starting point to 7 or 8 dwellings, otherwise these smaller properties will never be built in sufficient numbers.

Page 232 Policy H4 Rural Exception Sites H4.1a.

The identified local need should not just be agreed by the LPA but also be agreed by Parish Councils who know the area in detail to avoid developers putting forward such plans just to build yet more houses in what may be unsuitable locations for prospective residents. It is particularly important to avoid these sites being developed outside of an SPB in areas far from amenities leading to a feeling of isolation from hubs that offer services such as shops, employment and public transport.

10 Supporting the Local Economy

Page 249 Objective A2.

It is important to maintain a flexible supply of land and buildings for business within our more rural communities and every effort must be made to prevent conversion to dwellings or other uses without rigorous assessment of the ability of new businesses to take vacant properties. Too often these buildings are not marketed properly to really determine whether there are business owners wishing to take on such properties when previous users have finished with them.

PART D: DEVELOPMENT MANAGEMENT POLICIES AND SITE ALLOCATIONS

11 Development Management Policies

Page 276 - Policy DM2 Trees, Hedgerows and Woodland.

This policy is supported fully in that these features form an absolutely essential part of our environment and are key to the maintenance of a balanced nature world in which we live and that is essential to our wellbeing. Along with these features there is also the need to retain open land with mixed low vegetation such as fields, common land and small parcels of rough ground where birds and animals can obtain food. Unnecessary loss of open ground is also a concern.

Page 277 - Policy DM2

Paragraph 11.11 should have the following sentence added: In addition, Tree Protection Plans must be submitted and compliance with these will be enforced.

Page 307 - Policy DM16 - Self and Custom Housebuilding.

There is no mention of how proposals for such building outside of settlement policy boundaries will be treated. It is very important to stop development in the country through stealth, whereby individuals seek to do self or custom housebuilding on individual plots that over time morph together into larger communities and thus take-over what was countryside and become a built environment. In particular, EHDC needs to state a clear policy on this issue in that proposals for self-build that imply multiple dwellings on large sites in close proximity outside SPBs will not be permitted. An example might be where a large field has been sold off by a landowner for such purposes outside the SPB and away from amenities, thus requiring the use of private vehicles at all times to travel from and to the site thus turning what was countryside into a semi-urban site.

Page 309 Para 11.113 - Policy DM17 Backland Development.

This paragraph implies that backland development is more likely than not to be approved given the sentence:

“Therefore, it is important that applications for the redevelopment of residential garden land are considered in the context of the presumption in favour of sustainable development and planning permission will be granted unless the adverse impacts on character, amenity and privacy outweigh the benefits of the development”.

If that is the case then it must be made clear that the form of the development must be tailored to the immediate locality in which it is situated and that buildings may need to be single storey or with less ‘presence’ in order to gain approval, particularly when the site is viewed from open areas/countryside. Backland development must merge with the surrounding area and not stand out as dominant in any views.

Strategic comment. It must also be remembered that residential gardens form a key part of the environment, providing habitat to a wide range of insects, birds and small mammals together with open space for humans to relax within. The loss of larger gardens to more development will have a significant adverse impact on many species that are already suffering from loss of habitat across built up areas and from the negative effects of climate change. That is why there should not be a presumption that backland development will be approved.

Page 310 – Policy DM18 Residential Extensions and Annexes

Paragraph DM18.2. b. states “It is proportionate in size to the principal dwelling”;

The adjective ‘proportionate’ can be very subjective so, as with SDNP Policy SD31: Extensions to Existing Dwellings and Provision of Annexes and Outbuildings paragraph 1a), a metric should be specified by EHDC to avoid any room for argument or doubt.

12: Site Allocations (Rowlands Castle)

Page 439 – Figure 12.24: Housing in Rowlands Castle.

The number of homes shown as awaiting outstanding permission (2023) is incorrect. No account appears to have been taken of Planning Application 53322/007 - Development of 61 dwellings - Land North of Bartons Road within Rowlands Castle Parish, which was recommended for approval during 2023 but still awaits a final decision and therefore is part of ‘outstanding permissions’. This site was not allocated in the EHDC Local Plan Housing and Employment Allocations (2016), or in this emerging Local Plan, and needs to be accounted for as an extra in new housing totals within the Parish

If application 53322/007 had not been considered as an ‘outstanding permission’ when the draft Local Plan was being prepared (which it should have been) it must be demonstrated that the significant number of 61 dwellings had been considered when determining the number of ‘Proposed New allocations’ required. This number of houses will make a very considerable increase in the total to be built in Rowlands Castle Parish from outstanding permissions and would more than compensate for the requested removal of Sites RLC1 and RLC2 as discussed below. The proposed new allocations (to 2040) should now be reviewed and the proposed small numbers of housing for RLC1 and RLC2 deleted from that total.

In addition, for completeness, the table should show the number of windfalls projected over the plan period, based on the windfall allowance analysis, referred to in Part A Chapter 2 paragraph 3.25 on page 40 of the draft Local Plan

Page 439 – Figure 12.25: Location of outstanding housing permissions and proposed sites in Rowlands Castle.

The footnote states that the ‘Proposed development at Little Leigh Farm site falls within Rowlands Castle Parish but relates to the built-up area of Havant Borough Council’. This could wrongly imply that the number of dwellings on this site would not be included in the ‘Proposed new allocations (to 2040)’ of 145 new homes within Rowlands Castle. This is a development within the Parish boundary and must be considered within the overall numbers of housing built within the Parish, hence our request that the numbers in Figure 12.24 be adjusted accordingly.

For clarity, the footnote could indicate that the ‘Little Leigh Farm site’ can be seen on the Policies Maps.

LAA Reference RC-006 – RLC1 - Land at Deerleap Lane (North) and LAA Reference RC-007 – RLC2 - Land at Deerleap Lane (South) – Overarching comments

The Green is the heart of Rowlands Castle Village and the Conservation Area and any changes go to the heart of both. The long flint wall on the south side is a unique feature and the woods

behind underpin the sense of this being the rural fringe to the south of the village centre. Development of these sites would run contrary to Rowlands Castle Parish Neighbourhood Plan Policy 2 (Landscape Character and Views), specifically Policy Objectives 1 and 2 wrt conserving and enhancing the parish landscape and maintaining the distinctive landscape vistas. The Policy states that “Development proposals that would have an unacceptable impact on a locally significant view will not be supported”. In particular, Important View C6 (Rowlands Castle Village Green, view south towards Deerleap) applies here; there will be a very adverse visual impact on the Conservation Area as seen from the Green and from dwellings surrounding the Green, which look out on a variety of trees within the Deerleap area behind the flint wall on the north side of RLC1., This will greatly alter for the worse the whole feeling of this semi-rural village centre. The Neighbourhood Plan has been approved by EHDC but these site allocations contravene Policy 2.

Also, RCPC is very concerned that a valuable green space would be lost that not only adds very considerably to the character of Rowlands Castle centre within the Conservation Area but within which a variety of amphibians live and move annually to the nearby lake, close by within the Deerleap development, to breed. Dormice, another protected species, have also been found on both sites. The overall habitat and environment within the SPB benefit from a number of green spaces; these 2 areas, being secluded and not normally experiencing human presence, provides great habitat for a wide range of insects, animals and birds.

Additionally, the area currently absorbs heavy rainfall when it occurs; the building of dwellings with attendant roads and driveways that are not permeable could lead to considerable runoff that will affect existing properties to the north and below the 2 sites, together with Redhill Road along the Green where flooding does already occur during prolonged heavy rain.

Overall, RCPC is strongly opposed to the development of these 2 sites (along with many residents) and requests that they be deleted from sites for consideration. Further detailed comments on the information provided w.r.t. the specific sites in the draft LP follow:

RLC1 – Land at Deerleap (north)

Page 441 - List of Constraints & Opportunities. Additional comments on some aspects:

1. **Biodiversity:** The site is designated as ‘Wood pasture and Parkland BAP (Biodiversity Action Plan) Priority Habitat (England). Wood pasture and parkland are mosaic habitats valued for their trees, especially veteran and ancient trees, and the plants and animals that they support, so the site has a significant biodiversity value. Policies NBE2: ‘Biodiversity, Geodiversity, and Nature Conservation’ and DM2: ‘Trees, Hedges and Woodland’ will apply.

The ‘Sustainability Appraisal (SA) of the East Hampshire Site Allocations Plan – April 2015’ stated for site ‘RC002 – Land at Deerleap’:

‘There is the potential for the site to have value for biodiversity, given that it has a meadow grassland character, and is surrounded by a wooded landscape to the south’. The SA showed that the then-proposed site had an area of 0.8, while the combined area of sites RLC1 and RLC2 is 1.6 ha so together they would have a greater value for biodiversity. This site was not allocated in the East Hampshire District Local Plan - Housing and Employment Allocations Plan’ – April 2016.

The site is also designated as: National Habitat Network All Habitats Combined (England) - Network Enhancement Zone 1'.

Great Crested Newts, smooth newts, frogs and toads migrate from a pond to the south of Deerleap Lane across the proposed Deerleap sites to a pond adjacent to the sites. See below for 'Photograph of smooth newt, great crested newt and toad'. This photograph of the amphibians undertaking this journey was taken in February 2024. Dormice, which are another protected species have also been found on the site.

Photograph of smooth newt, great crested newt and toad'



2. Water Quality: Because the site is within a groundwater source protection zone (SPZ1), any development must comply with Policy NBE13: 'Protection of Natural Resources'.
3. Built Heritage: The northern boundary wall is the 'Flint wall, Deerleap', which is classified as a 'non-designated heritage asset' in the Rowlands Castle Neighbourhood Plan Policy 4 – Historical Environment: Non-designated Heritage Assets (number 7 in Table 3 on page 32, and on page 36). Policy DM10: 'Locally important and non-designated heritage assets,' will apply. [Views of the flint wall are also included in the 'Rowlands Castle Settlement Character Assessment (2020)' on pages 5, 6 and 27.]
4. Landscape: The area of the Conservation Area within the Rowlands Castle Parish is about 6 hectares so the sites RLC 1 and RLC 2 (total area 1.6 hectares) together would occupy 27% of the Conservation Area and thereby would have a very significant adverse impact on the Area, by removing the open character of this part of the Area.

The Rowlands Castle Conservation Area Guidance leaflet published by EHDC includes:

- ‘The character of the Rowlands Castle Conservation Area is created by the strong combination of the 19th century homes which front onto the large open Green and the high flint walls of Deerleap. When taken together these features create an attractive scene and even minor alterations could spoil it.’
- The design of new buildings, extensions and alterations to existing buildings will all affect its character.’
- ‘The grounds of Deerleap are a basic landscape component to the village and form a rural edge to its southern side as well as a separation from neighbouring settlements and a contrast to the built form encircling The Green.’

The Rowlands Castle Conservation Area Guidance leaflet is part of the Evidence Base for Rowlands Castle Neighbourhood Plan Policy 4 – Historic Environment – Non-designated Heritage Assets.

- The development would remove the rural edge of the Conservation Area that separates it from the recent developments on Bailey Road and Deerleap Lane (on the site of the former Keyline builders’ merchants).
- It would not be possible to mitigate the impact of any development on the site in order to comply with Rowlands Castle Neighbourhood Plan Policy 2 - Landscape Character and Views. The significant view C6 in Table 1 on page 20 of the Neighbourhood Plan is of the northern boundary of the site as viewed from Rowlands Castle Village Green (a ‘Local Green Space’). This is because the site slopes upwards from the approximately 3-metre-high flint wall so the upper parts of walls and roofs of any dwellings would be much higher than the flint wall and, therefore, very visible from the village green especially when the trees shed their leaves. The further back from the flint wall any development might be, the higher the ground would be and the greater the impact on the local green space and conservation area would be.
- See at end of this document (Annex B) the ‘Examiner’s report for Deerleap for EHDC Local Plan Second Review – 2006’. Page 2 of that report paragraph 5.4.40 last sentence states: “Development of this land as proposed would fly in the face of the relevant legislation that is designed to protect these Areas. It should not be countenanced”.
- Development of this site would not comply with policy DM3 (Conservation Areas) paragraph DM 3.1 or paragraphs DM 3.2 c) and DM 3.2 d).

Page 441 - Summary of Reasons for Inclusion. Additional comments:

1. The site is in the Rowlands Castle Conservation Area, so mature trees *must* (and not ‘*could*’) be retained. See policy DM3 ‘Conservation Areas’.
2. To avoid impacts on the local green space and conservation area, in addition to retaining the northern boundary wall, the trees along the boundary which are in the Rowlands Castle Conservation Area and are therefore protected, would have to be retained. The northern boundary wall is the ‘Flint wall, Deerleap’ which is classified as a ‘non-designated heritage asset’ in the Rowlands Castle Neighbourhood Plan Policy 4 ‘Historic Environment: Non-Designated Heritage Assets’ - number 7 in Table 3 on page 32, and on page 36, and must, therefore, be retained.

3. The Rowlands Castle Village Green (a 'Local Green Space') was registered as a 'Village Green' in 1966 so under acts of parliament it is protected from any development. The registration documents are held by the Hampshire County Council 'Commons Registration Authority'. Plans Policy NBE12: 'Blue and Green Infrastructure' will apply.

Page 441 - Infrastructure Requirements. Additional comments:

Access. The Developer Contributions should be towards accessibility to the Down platform and also improved parking provision at Rowlands Castle train station as stated in in section 15 'Infrastructure Schedule' (page 81) of the 'Draft Local Plan 2021-2040 (Regulation 18) Emerging Infrastructure Plan' January 2024. There should also be a contribution for improvements to the mini-roundabouts at the junction of Whichers Gate Road, Redhill Road and Manor Lodge Road.

RLC2 – Land at Deerleap (south)

Page 444 - List of Constraints & Opportunities. Additional comments on some aspects:

1. Biodiversity: The site is designated as 'Woodpasture and Parkland BAP (Biodiversity Action Plan) Priority Habitat (England)' so like site RLC1 it has a significant biodiversity value. Policy NBE2: 'Biodiversity, Geodiversity, and Nature Conservation' and DM2: 'Trees, Hedges and Woodland' will apply.

The 'Sustainability Appraisal (SA) of the East Hampshire Site Allocations Plan' – April 2015 stated for site 'RC002 – Land at Deerleap':

'There is the potential for the site to have value for biodiversity, given that it has a meadow grassland character, and is surrounded by a wooded landscape to the south'.

The SA shows that the then-proposed site had an area of 0.8, while the combined area of sites RLC1 and RLC2 is 1.6 ha so they could have a greater value for biodiversity. This site was not allocated in the East Hampshire District Local Plan - Housing and Employment Allocations Plan' – April 2016.

The site is also designated as 'National Habitat Network All Habitats Combined (England) – Network Enhancement Zone 1'.

As for RLC1 above, Great Crested Newts, smooth newts, frogs and toads migrate from a pond to the south of Deerleap Lane across the proposed Deerleap sites to a pond adjacent to the sites. See photo within RLC1 additional comments above. Dormice, another protected species, have also been discovered on this site

2. Water Quality: Because the site is within a groundwater source protection zone (SPZ1), any development must comply with Policy NBE13: 'Protection of Natural Resources'.
3. Access: On the Site Map on page 443, the site boundary is denoted by a red line, and there is a wooded area between the site boundary and Deerleap Lane. It is not indicated if that wooded area is in the same ownership as the site, and so it is not demonstrated that there could be access to the site.

There is also an issue with achieving the required visibility splay from the existing access to the site because the trees along the boundary are in a conservation area and are, therefore, protected and could not be removed. The visibility splay would have to be sufficient because of the proximity of the access to the sharp bend on Deerleap Lane.

The area of Deerleap Lane where the proposed site access would be is an unadopted road for which a management company is responsible. It is not stated that the management company would permit residents of the proposed site to use Deerleap Lane.

4. Landscape: The area of the Conservation Area within the Rowlands Castle Parish is about 6 hectares so the sites RLC 1 and RLC 2 (total area 1.6 hectares) together would occupy 27% of the Conservation Area and thereby would have a very significant adverse impact on the Area, by removing the open character of this part of the Area.

The Rowlands Castle Conservation Area Guidance leaflet published by EHDC includes:

- 'The character of the Rowlands Castle Conservation Area is created by the strong combination of the 19th century homes which front onto the large open Green and the high flint walls of Deerleap. When taken together these features create an attractive scene and even minor alterations could spoil it.'
- 'The design of new buildings, extensions and alterations to existing buildings will all affect its character.'
- 'The grounds of Deerleap are a basic landscape component to the village and form a rural edge to its southern side as well as a separation from neighbouring settlements and a contrast to the built form encircling The Green.'

The Rowlands Castle Conservation Area Guidance leaflet is part of the Evidence Base for Rowlands Castle Neighbourhood Plan Policy 4 – Historic Environment – Non-designated Heritage Assets.

The development would erode the rural edge of the Conservation Area, that separates it from the recent developments on Bailey Road, and Deerleap Lane (on the site of the former Keyline builders' merchants).

Because of its elevated position relative to the village, any development on this site would be visible from the village green (a local green space) and it would not be possible to mitigate its impact on the village green in order to comply with Rowlands Castle Neighbourhood Plan Policy 2 - Landscape Character and Views (significant view C6).

Development of this site would not comply with policy DM3 (Conservation Areas) paragraph DM 3.1 or paragraphs DM 3.2 c) and DM 3.2 d).

Page 444 - Summary of Reasons for Inclusion. Additional comments:

The site is in the Rowlands Castle Conservation Area, so mature trees *must* (and not '*could*') be retained. See policy DM3 'Conservation Areas'.

Page 444 - Infrastructure Requirements. Additional comments:

Access. The Developer Contributions should be towards accessibility to platforms and parking provision at Rowlands Castle train station as stated in in section 15 'Infrastructure Schedule' (page 81) of the 'Draft Local Plan 2021-2040 (Regulation 18) Emerging Infrastructure Plan' January 2024. There should also be a contribution for improvements to the mini-roundabouts at the junction of Whichers Gate Road, Redhill Road and Manor Lodge Road.

Points to note from Previous Versions of EHDC Local Plans

1. EHDC Local Plan Second Review – 2006. The draft version of this Local Plan which was submitted for public consultation included a Reserve Site for 'Land at Deerleap' covered the area of sites 'RLC1 – Land at Deerleap (north)' and 'RLC2 – Land at Deerleap (south)'. It included:

- Northern Land – 17 properties
- Southern Land – 30 dwellings:
 - 12 - 2-bedroom flats
 - 10 - 2/3-bedroom houses
 - 5 - 2-bedroom flats
 - 3 - 5-bedroom houses

It also included a footpath and cycle way through part of the flint boundary wall and across the adjoining Rowlands Castle Village Green. See at the end of this document Annex A, the 'Plan for Deerleap submitted for EHDC Local Plan Second Review – 2006'.

At the request of the Inspector, this Reserve Site was deleted from the Local Plan that was subsequently adopted in 2006. See at the end of this document Annex B, the 'Inspector's report for Deerleap for EHDC Local Plan Second Review – 2006'.

2. East Hampshire District Local Plan - Housing and Employment Allocations Plan' – April 2016. The 'Strategic Housing Land Availability Assessment (SHLAA)' in 2015 included site 'RC002 – Land at Deerleap' with an estimated area of development of 0.7 hectares and a potential housing capacity of 17 dwellings. The site was not included for allocation in the draft version of the Local Plan, and at the Local Plan Inquiry hearings held between 26 October and 30 October 2015, a planning consultant engaged by the owner, argued that the site should be included. However, the examiner's report of 15th February 2016 shows that the site would not be included in the plan.

RLC3 – Land at Oaklands House

Page 446 - List of Constraints & Opportunities. Additional comment on one aspect:

Biodiversity. The site is designated as 'National Habitat Network All Habitats Combined (England) – Network Enhancement Zone 1'

Page 447 - Summary of Reasons for Inclusion. Additional comments.

1. There must be no development on the 'Oaklands Meadow' SINC, in order to comply with Policy NBE2: Biodiversity, Geodiversity and Nature Conservation. This SINC occupies about 1.8 hectares of the southern part of the site adjacent to Whichers Gate Road, and covers about 50% of the total area of the site.

2. The housing density should be consistent with that of the development on the adjoining Woodlands Avenue and Oak Tree Close, which has a density of 19 dwellings/hectare, but which includes a significant amount of public open space including an attenuation pond.
3. There should be an area of Public Open Space surrounding the protected oak tree at the centre of the developable area of the site.
4. Consideration could be given to providing at least part of the ‘Oaklands Meadow 1 & 2’ SINC as Public Open Space’ provided this would not have an adverse impact on the SINC.
5. The development is on the edge of the countryside within the Rowlands Castle parish and should therefore reflect the more rural feel, appearance and sense of place shown in general by properties in Rowlands Castle.
6. Further comments on this site are contained in Rowlands Castle Parish Council’s response in December 2021 to the consultation on certain sites being considered for allocation in the version of the then emerging Local Plan. This site was then referred to as ‘SA39’. That earlier response from RCPC is included as an attachment to this response on the latest draft Local Plan for completeness in case it is not held on the EHDC site information database.

Page 447 - Infrastructure Requirements. Additional comments:

Access:

- Woodlands Avenue, including the three-arm roundabout where the proposed site access would be, is an unadopted road for which a management company is responsible. There would be a need for the management company to permit residents of the proposed site to use Woodlands Avenue.
- A link must be provided from the site to the footpath along the northern boundary of the site which links with Bridleway 24 to facilitate access to the centre of the village and its amenities without the need to use a car. This footpath could be upgraded to accommodate cyclists so that, by using Bridleway 24, cyclists would not need to use the busy main roads to reach the village centre.
- The Developer Contributions should be towards accessibility to the Down platform and improved parking provision at Rowlands Castle station as stated in in section 15 ‘Infrastructure Schedule’ (page 81) of the ‘Draft Local Plan 2021-2040 (Regulation 18) Emerging Infrastructure Plan’ January 2024. There should also be a contribution for improvements to the mini-roundabouts at the junction of Whichers Gate Road, Redhill Road and Manor Lodge Road and for the improvement of Bridleway 24 to enable pedestrian use in all weathers.

RLC4 – Land at Little Leigh Farm

Page 449 - List of Constraints & Opportunities. Additional comments as follows:

Biodiversity. The site is designated as National Habitat Network All Habitats Combined (England) – Network Enhancement Zone 1’

Page 450 - Summary of Reasons for Inclusion. Additional comment:

Suggestions relating to the layout of this site and the design of dwellings and streets are contained in Rowlands Castle Parish Council's response in December 2021 to the consultation on certain sites being considered for allocation in the version of the then emerging Local Plan. This site was then referred to as 'SA41'. That earlier response from RCPC is included as an attachment to this response on the latest draft Local Plan for completeness in case it is not held on the EHDC site information database.

Page 450 - Infrastructure Requirements. Additional comments:

1. Education. The site is actually within the catchment area of Rowlands Castle St. John's Church of England Controlled Primary school and children from Havant attend that school. However, there are limited places available and so the majority of educational places should be found within the Havant Borough Council Area.
2. Access.
 - The design and location of the access from Prospect Lane should recognise the rural nature of the landscape of the Lane rather than being a suburban access road and it should respect the design of the 19th Century Prospect Farm Cottage which would be in close proximity to an access.
 - Prospect Lane is designated as a bridleway and is known as Shipwrights Way and Stansted Way and it also forms part of National Cycle Route 22. There are stables on both sides of Prospect Lane. Accordingly, the lane must safely accommodate all users (vehicles, pedestrians, cyclists, horse riders and horses). The road should not be widened for vehicles, but a pedestrian footpath/cycle way should be constructed.
 - If the layout of Prospect Lane is to be changed the mature landscape barriers must be retained. This would include the trees, recognising that the Lane is in the 'strategic gap' between Rowlands Castle and Havant (Rowlands Castle Neighbourhood Plan Policy 1 (Gaps between Settlements)).
 - Signs should be placed at both ends of this narrow part of Prospect Lane, stating there is a width restriction allowing only cars and small vans to use it except for access. By keeping it narrow the majority of motorists would be discouraged from using it and would turn southwards when leaving the site.
 - This site is within the catchment area of St. John's Church of England Controlled Primary School, Whichers Gate Road, Rowlands Castle and so parents/carers and children from this development who attend this school would have to travel along it by foot or by car to reach the school the grounds of which has no parking for other than vehicles owned by staff. The addition of a pedestrian footpath/cycle way would benefit parents/carers and children.
 - It is nevertheless possible that there would be an increase in traffic on Prospect Lane arising from vehicles which would use it to travel north-eastwards and thence north-westwards or south-eastwards along Whichers Gate Road. Therefore, the capacity, design and layout of the stretch of Prospect Lane between the proposed site access and Whichers Gate Road must be given very careful consideration. The following factors must be considered:
 - The visibility splay and layout of the junction of Prospect Lane and Whichers Gate Road must be assessed because of the increased traffic arising from this development and poor visibility to the right on leaving Prospect Lane.

- Part of Prospect Lane about 100 metres south of its junction with Whichers Gate Road lies within a Flood Zone 3 where a main river crosses the road. Measures should be taken to mitigate the impact of flooding on the additional traffic arising from this development. Flooding is very likely to increase at this point because of increased and intense rain so this aspect also needs good mitigation, perhaps a proper culvert under the road if the lie of the land permits it.
- There should be developer contributions towards accessibility to the Down platform and improved parking provision at Rowlands Castle train station as stated in in section 15 'Infrastructure Schedule' (page 81) of the 'Draft Local Plan 2021-2040 (Regulation 18) Emerging Infrastructure Plan' January 2024. There should also be a contribution for improvements to the mini-roundabouts at the junction of Whichers Gate Road, Redhill Road and Manor Lodge Road and for improvements to Bridleway 24, which leads to the centre of Rowlands Castle from the NE end of Prospect Lane. The surface of the bridleway needs upgrading so it can be used by pedestrians and cyclists in all weathers.

DRAFT LOCAL PLAN 2021-2040 (REGULATION 18) POLICY MAPS

Page 31 of 34 - Policies Map for Rowlands Castle. The Settlement Policy Boundary for Rowlands Castle should be further amended to include the following:

- The site for 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 (amendments and additional information received 16/03/23) - Land North of Bartons Road, Rowlands Castle, Havant - Permission for this site is awaited.
- Spire Hospital, Bartons Road
- The Oaks Crematorium, Bartons Road

The Policies Map should also be amended to exclude the 2 Deerleap Sites if the decision is made to exclude those 2 sites from the list of Site Allocations after this consultation.

EHDC DRAFT LOCAL PLAN 2021-2040 – COMMENTS ON APPENDICES

Appendix A: Background Information

Page 485: How will the new Local Plan affect and support Neighbourhood Plans?

This includes:

'As the Plan moves forward, the current neighbourhood plans may need to be reviewed to bring them in line with the new Local Plan. Alton Neighbourhood Plan is currently being reviewed with a view to **complimenting** the emerging Local Plan including identifying sites for development.'

The word in blue font must be replaced by '**complementing**'.

Appendix B: Abbreviations and Glossary

Definitions of the following should be added:

- Local Green Space – referred to on pages 274, 441, 446, and 447
- Rural Exception Sites
- Transport Assessment - referred to in paragraph 8.39 on page 194
- Transport Statement – referred to in paragraph 8.39 on page 194
- Windfalls

In addition, the draft Local Plan does not use consistent terminology throughout with respect to 'permissions'. This category is variously described as 'existing planning permissions', 'current planning permissions', 'permissions' and 'outstanding permissions'. The 'Glossary' does not give the definition of any of these terms. It is proposed that two definitions be used, that of 'Approved permissions' where the LPA has approved the application and 'Outstanding permissions' where an application has been made but has not yet been approved by the LPA.

Appendix F: Vehicle Parking Standards

- Page 502 includes:
 'The parking standards of the following tables are minimum requirements for new development proposals'
It is proposed that these standards should also apply to the new use of a building whose use is changed.
- Page 507 Petrol Stations. This refers to 'section 5.5' where further detail is provided, but there is no such 'section 5.5' in this part of the Local Plan.

The parking standards should include spaces for staff, especially where the building provides significant retail facilities. Staff that arrive by car will reduce spaces provided for visitors and there will be those who do not want fuel and so will not park at a pump space.

- Page 511. It must be recognised that many places of worship do not have 'fixed' seats such as pews and so there must be a clear standard set for such places. As it stands this standard would not apply to places with no fixed seats, leaving a hole in setting requirements, which must be addressed.

Appendix G: Table of Local Plan Policies

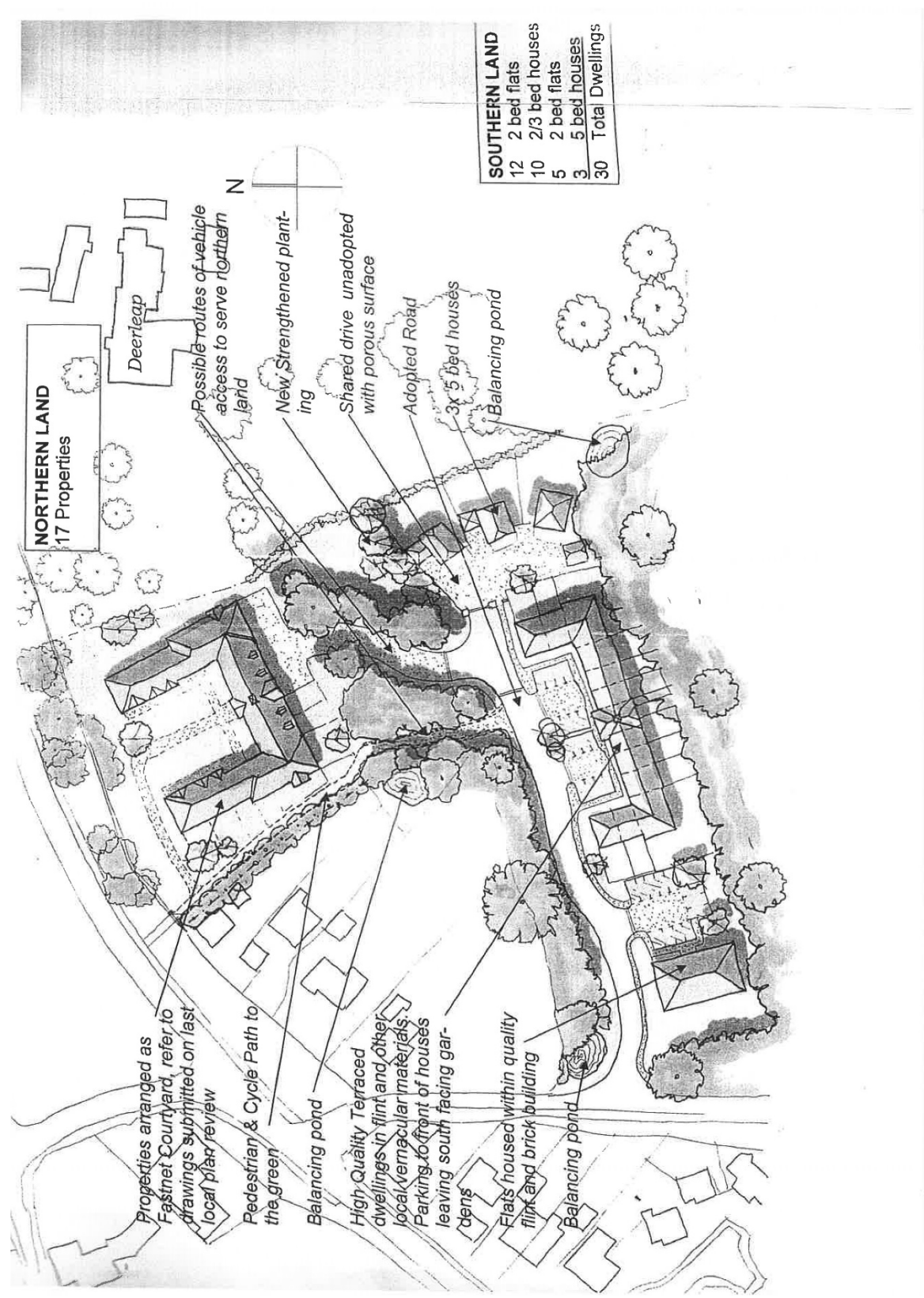
- Page 521. This indicates that the only replacement for policy 'CP27-Pollution' is 'DM13 – Air quality'. However, CP27 has a much wider scope than 'air quality'. For example, it includes requirements relating to loss of privacy and lighting schemes. It would appear that it is also replaced by 'DM11- Amenity'. It should be specified if it is replaced by other policies relating to, for example, lighting.



Lisa Walker
Clerk to Rowlands Castle Parish Council
29th February 2024

Annex A – The Plan for Deerleap submitted for EHDC Local Plan Second Review – 2006
Annex B – The Inspector's report for Deerleap for EHDC Local Plan Second Review – 2006
Annex C – RCPC Response to EHDC's Consultation on Site SA39 (Land at Oaklands House) – 2021
Annex D – Response to EHDC's Consultation on Site SA41 (Little Leigh Farm) – 2021

Annex A: Plan for Deerleap submitted for EHDC Local Plan Second Review – 2006



SOUTHERN LAND	
12	2 bed flats
10	2/3 bed houses
5	2 bed flats
3	5 bed houses
30	Total Dwellings

ANNEX B: 'EXAMINER'S REPORT FOR DEERLEAP FOR EHDC LOCAL PLAN SECOND REVIEW – 2006'

ROWLANDS CASTLE

RESERVE, DELETED AND OMISSION SITES

Objections

As set out in the Annex at page 92.

THE RESERVE SITE -LAND AT DEERLEAP-HAR12

Latest Proposed Change

As set out in Document CD1 1/12 at PIC033.5, FPC27, PIC036.5, PIC034.5, PIC035.5 and PIC042.5 (page 101).

Main Issues

- 1) Whether there is a need for additional housing in this settlement;
- 2) Whether this is an appropriate site for housing in terms, for example, of the effect of development on the Conservation Area, local roads, flooding and nature conservation.

Inspector's Reasoning and Conclusions

5.4.35 Rowlands Castle is the most southerly settlement in the District, being about 5 km from Havant Town Centre. It is a relatively well-contained large village with a main line railway station with 2 trains an hour to Portsmouth and London (Waterloo). It has a more limited hourly bus service to Emsworth via Havant (Route 27) between 0800 and 1800 hrs. It has a primary school, public houses, some shops, employment and a range of community facilities. In the Council's hierarchy of settlements it is in Group 2. I agree that Rowlands Castle is a reasonably sustainable location that, in principle, should be able to accommodate a modest increase in its housing stock. In view of Structure Plan housing requirements and the significant degree of sustainability of this settlement, I accept that there is a need to find suitable land here for an appreciable amount of residential development.

5.4.36 I turn now to matters raised in the second issue, of which the effect of development on the character or appearance of the Rowlands Castle Conservation Area is especially important. The Green is the historic centre of the village, and this attractive open space is the focus of this Area. Its boundaries embrace the plots of houses fronting the north of The Green and, to the south, the extensive grounds and paddock attached to the house known as Deerleap. The remains of the Motte and Bailey castle, a Scheduled Ancient Monument (SAM), also lie within the Area, most being in the grounds of Deerleap.

5.4.37 The Latest Proposed Change envisages 30 dwellings on this green field Reserve Site that comprises a paddock of about 0.8 ha. It is close to the village centre, its shops and the railway station, and is about 1 km from the school. Access would be from a road that serves a large and busy builders' merchant premises (Keylme) sited within woodland to the south. The Council considers that development here, provided it was of a very high standard, would be acceptable. But I am not persuaded that it could be undertaken in such a way as to preserve or enhance the character or appearance of the Conservation Area.

5.4.38 The site is enclosed by trees and hedges, and so it would be difficult to discern any development on it during the summer from The Green. But I think it highly likely that parts of the scheme would be seen during the winter months, when there is less leaf cover, through the tracery of trees and hedges. It would most certainly be visible from the bridleway/road, from which access would be gained, at all times of the year. The Council and the few supporters of the allocation place too much emphasis on the likely appearance of the development. That is not enough. It is also important to have regard to its actual presence, especially when a vital criterion is the effect on the Conservation Area.

5.4.39 The Council's Conservation Area leaflet recognises the importance of the grounds of Deerleap in contributing to the character and appearance of the Area. They are recognised as *a basic landscape component to the village as forming a firm rural edge to its southern side*. That assessment is not challenged, and I endorse it. The openness of the grounds, including the paddock, is crucial in any appreciation of that character and appearance. The designation of a Conservation Area does not proscribe development from taking place, but the Planning (Listed Buildings and Conservation Areas) Act 1990 Section 72 requires, in essence, that a scheme must preserve or enhance the special qualities that led to designation. In 1997, an Inspector dismissed an appeal against the refusal of planning permission for a mews development adjacent to the house "Deerleap" because of the harm that it would cause to the Conservation Area. That decision is still relevant, in that I agree with that Inspector's assessment of the special qualities of the Conservation Area and the harm that residential development would have on it.

5.4.40 Irrespective of the degree to which it might be seen, the actual presence of development on this Reserve Site would materially detract from the open character of this part of the Conservation Area, and from that Area in its entirety. It would irretrievably erode *the firm rural edge* of the Conservation Area and the setting of the village hereabouts to a degree that it would be profoundly harmful to both. Development of this land as proposed would fly in the face of the relevant legislation that is designed to protect these Areas. It should not be countenanced.

5.4.41 The Council rightly sees matters of flooding and traffic as important and requiring more attention, and accepts that these could be addressed at the development brief or detailed application stage. The responsible agencies, however, raise no objection in principle to development on these grounds. **English Heritage's** original objection that development would harm the SAM, is withdrawn following the change to the eastern boundary of the allocation. The land does not qualify as a Site of Nature Conservation Interest (SINC) and so this type of interest could presumably be safeguarded under SDDP Policy CS. Accordingly, I find no sustainable objection to the allocation on these grounds. Presence and effect on the Conservation Area are by far the prime considerations.

5.4.42 This proposed allocation has attracted more objections than any other SDDP

proposal or policy, That does not surprise me, and I agree with the *gist* of the representations made. The deletion of this site from Table H2 means that alternative land should be sought. I discuss this below.

Recommendation

5.4.43 I recommend that the SDDP be modified by the deletion of the Reserve Site . at Deerleap from Table H2.

Rowlands Castle Parish Council

11 The Green, Rowlands Castle PO9 6BW

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

Annex C:

Response to EHDC's Consultation on Site SA39 (Land at Oaklands House) for Emerging Local Plan – December 2021

Site name
Land at Oaklands House, Rowlands Castle – (EHDC reference SA39)
Name of Parish/Town council responding
Rowlands Castle Parish Council (RCPC)
<p>In responding to these questions, the Parish Council defined the following general principles, recognising that the EHDC Local Plan (Regulation 18) proposed that this site would be allocated for development 2033-34 to 2035-36 and that consequently the dwellings would be occupied in to the 22nd century and should be designed accordingly:</p> <ul style="list-style-type: none">• Housing density to be kept to a quality of life enhancing limit of 15 dwellings per hectare of developable land. The site would be on the edge of the Rowlands Castle Settlement and surrounded on 3 sides by a rural landscape, and such a density would provide a transition from the rural countryside to a less intense development.• Inclusion of eco-friendly features including: grass/matrix pavements, double/triple glazing, roof insulation, passive heating, heat pumps, integral solar panels, rain water collection, harvesting and res-use of grey water.• Provision of private residential gardens for relaxation, growing of plants and vegetables, drying washing etc (Policy S27 g)).• Plenty of parking commensurate with a modern, semi-rural life (on average spaces 2.5 per household).• Incorporation of parking bays and laybys (of generous size) into the design and layout where necessary.• Design features and dimensions to add character and enhance the appeal of (all) the houses (e.g. finials, flint features, brick garden walls, weatherboarding, etc.). (Policy S27 d)).• Variation in styles and distribution of houses to break up uniformity of the streets and add character and identity to them.• Quality of build, brickwork and finish for long-term aesthetic appeal, irrespective of a dwelling's type of tenure. (Policy S27 d)).• Overarching aim to create homes that people will value and care for over a long term, resulting in safe, harmonious, and attractive neighbourhoods• Provision of Public Open Spaces that are overlooked by the front of dwellings. (Policy S27 b) and d)).• The development should utilise local materials, architects and businesses as much as possible to tie the development to Rowlands Castle and reduce carbon footprint.• With its elevated position and sloping landscape with the large central oak tree as a natural focal point and surrounded by attractive woodland, the site provides an excellent opportunity to be a model estate with eco-friendly features and to serve as a template for other developments. The design and layout of the site must be sympathetic to this topography.

1. What are the important natural, historical, heritage and landscape features of the site and its environs? Please list and/or describe them

- a. A large oak tree at the centre of the site subject to Tree Preservation Order (TPO) ([EH1121](#))19.
- b. The 'Oaklands Meadow 1 & 2' (Reference EH0242) Site of Important Nature Conservation (SINC) occupies about 1.8 hectares of the southern part of the site adjacent to Whichers Gate Road, and there must be no building on this as is required by EHDC Local Plan Joint Core Strategy (2014) policy CP21 'Biodiversity' which states: 'New development will be required to: a) maintain, enhance and protect district wide biodiversity, in particular the nature conservation designations..... iii) Sites of Importance for Nature Conservation (SINC) (Hampshire)'. This SINC covers about 50% of the total area of the site.
- c. Within this SINC there are a Beech (T3) and Goat Willow tree (T5) subject to TPO (EH1121)19.
- d. Along the northern boundary of this SINC and the open field there are two individual Oak trees (T2 and T4), and a group of eight Oak trees, and all ten of these are also subject to TPO (EH1121)19. Any development must not impact these trees or their root protection areas by, for example, constructing a roadway through them.
- e. Adjoining the eastern boundary of the site is the Oaklands Woodland SINC (Reference EH0247) and any development must not adversely affect this.
- f. The north-western boundary of the site is with the land adjoining Woodlands Avenue which was designated as 'Open Space' in EHDC Planning Application 30016/18, so the development must not encroach on this attractive feature and should retain the hedgerow along the boundary.
- g. The landscaping design should, where appropriate, demonstrate how the Rowlands Castle Local Landscape Character Assessment (2012) has been taken into account.
- h. The design should:
 - Conserve and enhance those features that contribute to the character, pattern and evolution of the landscape.
 - Respect natural features.
 - Not have an adverse effect on the visual quality of the landscape.
 - Conserve and enhance the parish Network Opportunity Areas identified in the 2019 East Hampshire Green Infrastructure Strategy

2. What do you think is valuable about the features that you listed in your response to question 1?

These features preserve the rural aspects from and to the site. They are to the benefit of residents in the long term because they would enhance the quality of life and provide a sense of wellbeing arising from a connection with the countryside.

3. If there are views into or from the site that are particularly important for you, please describe these views (what you can see and from where) and say why they are important to you.

- a. The panoramic view from the higher part of the recently constructed footpath along the northern boundary of the site and leading to Bridleway 24, southwards over the site, over the Oaklands Meadow 1 & 2 SINC and the wooded areas, and Whichers Common towards Havant.
- b. Views from within the site and from Woodlands Avenue over the steeply sloping site, towards the Oaklands Woodland SINC. This includes the focal point of the much admired oak tree in the centre of the open part of the site.
- c. The site should remain screened by the hedgerow and trees along its boundary with Whichers Gate Road.

4. From where (i.e. from which road(s) and/or point(s) on the site's boundary) should vehicles gain access to the site?

Vehicular access should only be from the roundabout at the junction of Woodlands Avenue and Oaktree Close.

<p>5. From where (which path(s) and/or point(s) on the site's boundary) should pedestrians gain access to the site?</p>
<p>a. There should be pedestrian access from the roundabout at the junction of Woodlands Avenue and Oaktree Close.</p> <p>b. A link for pedestrians could be provided from the site to the recently constructed footpath along the northern boundary of the site. This would facilitate access to Bridleway 24 and enable the centre of the village and its amenities to be reached on foot.</p>
<p>6. Are there any opportunities for increasing access by cycle modes in addition to the access points identified under questions 4 and 5? If so, please give details of where these opportunities are on the site's boundary</p>
<p>The link referred to above in 5a, could be extended to accommodate cyclists so that by using Bridleway 24, cyclists would not need to use the busy main roads to reach the village centre.</p>
<p>7. What type(s) of housing do you think would be most appropriate for the site from the following list: detached, semi-detached, terraced, flats? Please identify as many types as you think are suitable and explain why.</p>
<p>a. To cater for the needs and aspirations of a wide community, the site should provide high quality mainly detached and semi-detached dwellings and some terraced dwellings.</p> <p>b. There should also be some bungalows and ground floor apartments suitable for elderly/disabled people and perhaps properties suitable for those who wish to downsize within Rowlands Castle but are unable to find a smaller property close to the village. The need for such accommodation was clearly identified in the Housing Needs Survey undertaken for our emerging Neighbourhood Plan. Such accommodation should include wider doorways, level access, space provision for future internal lifts, accessibility for wheelchairs etc. These features could be provided for at the design stage at very low cost and will allow extended age living whilst still looking like standard housing for all. There should be conditions preventing bungalows from being extended to include additional floors to maintain their original purpose and encourage down-sizing by those looking to do so.</p> <p>c. The type of housing should accommodate the following tenures: Market (Freehold), Affordable (Social Rent and Intermediate, and age-related).</p>
<p>8. Are there parts of the site that would be more suitable for new homes than others? If so, please give details of which parts (e.g. northern, southern etc.) are more suitable and explain why</p>
<p>a. Only the part of the site outside the 'Oaklands Meadow 1 & 2' SINC (about 1.7 hectares) would be suitable for the development of new homes because the SINC should be preserved. In accordance with the 'Principles' defined above, this part of the site would accommodate about 30 new homes. This provides a density consistent with that of the adjoining 'Land South of Oaklands' (now Woodlands Avenue and Oak Tree Close) development which has a density of 19 dwellings/hectare, but unlike this part of this site, it includes a significant amount of public open space including an attenuation pond.</p> <p>b. All age-related accommodation should be constructed in proximity to the lowest part of the site adjacent to Woodlands Avenue to avoid the need to walk up the sloping site. Such accommodation is likely to be single-storey bungalows and so they would not significantly prevent views over the site to the surrounding woodland or the central oak tree.</p>
<p>9. Where should other land uses (such as public open space, new community buildings and shops (if proposed)) be located on the site, in relation to new homes? Please explain your answer.</p>
<p>The following Public Open Space amenities should be provided:</p> <p>a. There should be an area of Public Open Space surrounding the oak tree at the centre of the developable area of the site.</p> <p>b. Only the fronts of dwellings should face and overlook the Public Open Space (POS) surrounding the central oak tree. The streets would be in front of the dwellings, and the POS would be on the opposite side of the streets. (Policy S27 b) and e)). See Appendix A, Figures</p>

1, 2 and 3.

- c. The POS must be provided on the site in advance of dwellings being occupied and must be accessible to all including people with disabilities.
- d. Boundaries of the POS should protect them for their proper use. For example, measures should be implemented to prevent unregulated and anti-social parking.
- e. Public seating should be provided.
- f. A scheme for the ongoing maintenance and management of the POS must be provided.
- g. Consideration could be given to providing at least part of the "Oaklands Meadow 1 & 2' SINC as Public Open Space' provided this would not have an adverse impact on the SINC.

10. A location plan image of the site at an appropriate scale has been e-mailed to your clerk. If you feel comfortable in doing so, you may annotate this plan (either electronically, if you have access to appropriate software, or by drawing on a printed-out version) to clarify your answers to questions 1-9. If you intend to supplement your answers with an annotated plan or drawing, please upload a scanned copy here.

N/A

11. If you were to think about the design of any new streets on the site, how do you think they should appear? You might wish to consider whether the new homes should be set back a constant distance, or whether this should vary; how much tree cover you might expect; how enclosed by buildings the streets should be; how the boundaries of new homes might be dealt with. If desired, please upload any photos of good examples.

a. Design of streets:

- The streets should be curved to provide more visual appeal.
- They should be wide enough to allow cars to pass unimpeded any cars parked along the road. This would discourage the parking of cars partially on the pavement.
- The pavements should be of tarmacadam on only one side of the roads, and of grass on the other to make the street scene more attractive. See Appendix A, Figures 4 and 6.
- To enhance the appearance of the streets (and possibly provide traffic calming), a variety of surfaces should be provided. See Appendix A, Figure 2.
- The streets should be lined with as many trees as possible to provide shade and to improve appearances, and where possible, incorporate rain gardens to cope with the predicted climate change. The 'Planning for the Future White Paper' stated: ' We will also deliver our commitment to make all new streets tree-lined, by setting clear expectations through the changes to the National Planning Policy Framework which will be consulted on in the autumn, and informed by the outcome of this summer's consultation on the England Tree Strategy'.
- The streets, surface and foul water drainage should be constructed to adoptable standards.

b. Design of housing:

- The streets should be curved to provide more visual appeal.
- They should be wide enough to allow cars to pass unimpeded any cars parked along the road. This would discourage the parking of cars partially on the pavement.
- The pavements should be of tarmacadam on only one side of the roads, and of grass on the other to make the street scene more attractive. See Appendix A, Figures 4 and 6.
- To enhance the appearance of the streets (and possibly provide traffic calming), a variety of surfaces should be provided. See Appendix A, Figure 2.
- The streets should be lined with as many trees as possible to provide shade and to improve appearances, and where possible, incorporate rain gardens to cope with the predicted climate change. The 'Planning for the Future White Paper' stated: ' We will also deliver our commitment to make all new streets tree-lined, by setting clear expectations through the changes to the National Planning Policy Framework which will be consulted on in the autumn, and informed by the outcome of this summer's consultation on the England Tree Strategy'.
- The streets, surface and foul water drainage should be constructed to adoptable standards.

12. How would you expect car parking to be dealt with on the site from the following list: on residential plots (e.g. driveway or garage); within parking bays along a street; within a parking courtyard in front of new homes; within a rear parking courtyard; by a mix of these approaches across the site; by another approach (please specify)? Please explain the reason(s) for your choice

- a. Car parking should wherever possible be on residential plots for ease of access by residents and to facilitate the overlooking of parked cars for security reasons.
- b. If car parking has to be provided within a courtyard either in front of or to the rear of dwellings which cannot have a driveway and garage, it should not have to accommodate a large number of vehicles. The following features should be provided to minimise the visual impact of such parking:
 - Between pairs of parking bays there should be a landscaped strip within which small bushes or shrubs would be planted. Arrangements would have to be made for the long-term maintenance of these. See Appendix A, Figure 7.
 - Instead of delineating parking bays with white paint lines, more aesthetically pleasing setts, metal studs or lines of timber should be used.
 - To prevent vehicle parking from visually dominating the streetscape, along the boundary of parking courtyards and streets, brick walls (and not wooden fences) to match adjoining dwellings should be built (except along the entrance to the courtyard) or tall hedgerows should be planted. See Appendix A, Figure 7.
- c. Parking in courtyard to the rear of dwellings should still be overlooked for security reasons. See Appendix A, Figure 8.
- d. Laybys should be provided for use by visitors as along Woodlands Avenue in Rowlands Castle.
- e. Measures to reduce 'residual parking' should be implemented.
- f. Car parking design should accommodate EV charging points either on the plot of a dwelling or in adjacent car parking areas such as courtyards.
- g. Evidence from recent developments in Rowlands Castle is that the residential parking standards in the EHDC Vehicle Parking Standards Supplementary Planning Document (July 2018) do not require the provision of sufficient residential and visitor parking spaces. Therefore, when a planning application is submitted, an assessment should be undertaken of how many parking spaces should be provided on the site.

13. Having listened to, or watched the recording of the developer's presentation about their vision for the site, did you agree with their proposals? Please explain your answer.

Not applicable because there was no developer's presentation made to support this consultation by EHDC.

By ticking this box, you acknowledge that this form will be submitted to East Hampshire District Council on behalf of your parish or town council and used by the planning policy team to inform the emerging Local Plan. The information you have supplied may be shared with the Planning Inspectorate and published only as part of the Council's evidence base for its Local Plan. All comments submitted as part of the consultation will be used in line with our Planning Policy Privacy Notice and kept according to our Retention Schedule, both of which can be found on our website (www.easthants.gov.uk/draft-local-plan)

Appendix A

Figure 1 – Dwellings with fronts adjoining access road and facing Public Open Space – Oak Tree Close, Rowlands Castle



Figure 2 – dwellings with fronts adjoining access road and facing Public Open Space – junction of Woodlands Avenue and Oak Tree Close, Rowlands Castle. This also shows different road textures



Figure 3 – dwellings with fronts adjoining footpath and facing Public Open Space, Woodlands Avenue, Rowlands Castle.



Figure 4 – grass pavement on one side of road and tarmac pavement on the other side - Oak Tree Close, Rowlands Castle



Figure 5 – brick and flint dwelling



Figure 6 – grass pavement – Oak Tree Close, Rowlands Castle



Figure 7 – Parking bays separated by landscaped strips – Oaklands Avenue, Rowlands Castle



Figure 8 – Courtyard Parking to rear of dwellings, but still overlooked – Woodlands Avenue, Rowlands Castle



Rowlands Castle Parish Council

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Annex D

Response to EHDC's Consultation on Site SA41 (Little Leigh Farm) for Emerging Local Plan – October 2021

Site name
Land South of Little Leigh Farm, Rowlands Castle – (EHDC reference SA41)
Name of Parish/Town council responding
Rowlands Castle Parish Council (RCPC)
<p>In responding to these questions, the Parish Council defined the following general principles:</p> <ul style="list-style-type: none">• Housing density to be kept to a quality of life enhancing limit of 20 dwellings per hectare.• Plenty of parking commensurate with a modern, semi-rural life (2.5 per household)• Incorporation of parking bays (of generous size) into the design and layout where necessary• Design features and dimensions to add character and enhance the appeal of (all) the houses (e.g. finials, flint features, brick garden walls, weatherboarding, etc.). (Policy S27 d)).• Variation in styles and distribution of houses to break up uniformity of the streets and add character and identity to them.• Quality of build, brickwork, and finish for long-term aesthetic appeal. (Policy S27 d))• Inclusion of eco-friendly features such as grass/matrix pavements, double/triple glazing, roof insulation, integral solar panels, harvesting and re-use of grey water.• Overarching aim to create homes that people will value and care for over a long term, resulting in safe, harmonious, and attractive neighbourhoods• Provision of Public Open Spaces that are overlooked by the front of dwellings. (Policy S27 b and d).• Provision of private residential gardens for relaxation, growing of plants and vegetables, drying washing etc. (Policy S27 g)).
1. What are the important natural, historical, heritage and landscape features of the site and its environs? Please list and/or describe them
<p>a. Prospect Lane to the north of a proposed access has a rural nature. This should be retained.</p> <p>b. The trees and bushes along the boundary with Worldham Road should be retained except for the three short stretches where pedestrian routes would be provided as shown on the Illustrative Master Plan.</p> <p>c. Along the boundary of the site with Prospect Lane, as stated in the Land Availability Assessment (LAA), there are mature landscape barriers (e.g. trees and bushes) and these should be retained and additional native species planted where there are no trees at present.</p> <p>d. The distinctive landscape vistas and the visual connectivity between the surrounding countryside and the site development should be maintained. Therefore, any additional planning along the eastern edge of the boundary should not be of a type which would grow to obscure the view from the dwellings over the surrounding countryside to the wooded landscape beyond. The planting should be sufficient to soften the visual impact of the dwellings from the surrounding countryside.</p> <p>e. It is noted that the Illustrative Master Plan shows a 15m buffer woodland strip at the northern edge of the site. However, this strip is outside the application site boundary ('red line') but</p>

within the 'blue line' boundary indicating it is in the same ownership. It must, therefore, be specified that this woodland strip would be retained.

- f. Site boundaries should, where appropriate, be planted with locally native tree and hedge species in preference to walls and fences. These species should not be of a type which would grow sufficiently to excessively overshadow dwellings.
- g. The landscaping design should, where appropriate, demonstrate how the Rowlands Castle Local Landscape Character Assessment (2012) has been taken into account.
- h. The design should:
 - Conserve and enhance those features that contribute to the character, pattern and evolution of the landscape.
 - Respect natural features.
 - Not have an adverse effect on the visual quality of the landscape.
 - Conserve and enhance the parish Network Opportunity Areas identified in the 2019 East Hampshire Green Infrastructure Strategy

2. What do you think is valuable about the features that you listed in your response to question 1?

These features preserve the rural aspects from and to the site. They are to the benefit of residents in the long term because they would enhance the quality of life and provide a sense of wellbeing arising from a connection with the countryside.

3. If there are views into or from the site that are particularly important for you, please describe these views (what you can see and from where) and say why they are important to you.

- a. The views 1, 2a, 2b, 3 a, 3b, 4, 5,6 and 7 in the Landscape and Visual Impact Assessment (LVIA) (Figure 6) are important because they face towards and from land in the current strategic gap between Rowlands Castle and Havant and so contribute to the visual separation of these settlements. They demonstrate the visual appeal of the rural nature of the site and the surrounding countryside.
- b. View 1 demonstrates the rural nature of Prospect Lane which should be retained.

4. From where (i.e. from which road(s) and/or point(s) on the site's boundary) should vehicles gain access to the site?

- a. Vehicular access should be from Prospect Lane at the same location as the existing gate to the site.
- b. As stated in the Land Availability Assessment (LAA) (December 2018) the options for highway access to this site need to be tested.
- c. The Illustrative Master Plan presented at the workshop on 1st September 2021 showed a vehicular access onto Prospect Lane only about 20 to 25 m south of Stansted Close to the west of Prospect Lane. The access to this site (SA41) would serve between 100 and 115 dwellings while the two junctions of Stansted Close and Prospect Lane serve about 90 dwellings. The viability and safety of locating this site access so close to one of the Stansted Close accesses must be very carefully assessed and any junction designed accordingly.
- d. As stated in the HCC East Hants Site Assessment, Prospect Lane is predominately a narrow single-track road with an average width of 4m and soft verges to either side.
- e. The design and location of the access from Prospect Lane should recognise the rural nature of the landscape of the Lane rather than being a suburban access road, and it should respect the design of the 19th Century Prospect Farm Cottage which would be in close proximity to an access.
- f. The rural nature of Prospect Lane north of the site access must be retained. It is important to recognise that it is designated as a bridleway and is known as Shipwrights Way and Stansted Way and it forms part of National Cycle Route 22. There are stables on both sides of Prospect Lane. Accordingly, the Lane must safely accommodate all users (vehicles, pedestrians, cyclists, horse riders and horses). The road should not be widened for vehicles, but a pedestrian footpath/cycle way should be constructed.

- g. If the layout of Prospect Lane is to be changed, as stated in the LAA, the mature landscape barriers must be retained. This would include the trees, recognising that the Lane is in the 'strategic gap' between RC and Havant (EHDC JCS Policy CP23).
- h. Signs should be placed at both ends of this narrow part of Prospect Lane, stating there is a width restriction allowing only cars and small vans to use it. By keeping it narrow the majority of motorists would be discouraged from using it and would turn southwards when leaving the site.
- i. This site is at present within the catchment area of St. John's Church of England Controlled Primary School, Whichers Gate Road, Rowlands Castle and so parents/carers and children from this development who would attend this school would have to travel along it by foot or by car to reach the school the grounds of which has no parking for other than vehicles owned by staff. The addition of a pedestrian footpath/cycle way would benefit parents/carers and children.
- j. It is nevertheless possible that there would be an increase in traffic on Prospect Lane arising from vehicles which would use it to travel north-eastwards and thence north-westwards or south-eastwards along Whichers Gate Road. Therefore, the capacity, design and layout of the stretch of Prospect Lane between the proposed site access and Whichers Gate Road must be given very careful consideration. The following factors must be considered:
 - The visibility splay and layout of the junction of Prospect Lane and Whichers Gate Road must be assessed because of the increased traffic arising from this development. The large increase in traffic forecast for Whichers Gate Road because of new developments in Rowlands Castle and the sites allocated in the emerging Havant Borough Local Plan, must also be considered. It is acknowledged that the visibility on the south side of the junction could be restricted because of the property on the corner and its boundary wall.
 - Part of Prospect Lane about 100 metres south of its junction with Whichers Gate Road lies within a Flood Zone 3 where a main river crosses the road. Measures should be taken to mitigate the impact of flooding on the additional traffic arising from this development. Flooding is very likely to increase at this point because of increased and intense rain so this aspect also needs good mitigation, perhaps a proper culvert under the road if the lie of the land permits it.
 - It is understood that HCC and EHDC intend to use S106 contributions to improve the safety of the crossing from Bridleway 24 (Shipwrights Way/Stansted Way) across Whichers Gate Road and its junction with Prospect Lane. This would make the crossing safer for horse riders, horses and cyclists. These proposed changes should be coordinated with any changes to the junction of Prospect Lane and Whichers Gate Road being proposed for this site.
 - It is also understood that HCC may be implementing further traffic calming measures along Whichers Gate Road using another S106 contribution. Again, any changes proposed to this junction because of the traffic arising from this development must be consistent with those changes.

5. From where (which path(s) and/or point(s) on the site's boundary) should pedestrians gain access to the site?

- a. The pedestrian accesses and links shown as dotted yellow lines on the Illustrative Master Plan should be provided.
- b. A large stretch of the pedestrian link to the north of the site is outside the application site boundary ('red line') but with the same ownership as that of the site to be developed ('blue line'). It must be ensured that this pedestrian link would be provided when the site is developed and subsequently maintained.

6. Are there any opportunities for increasing access by cycle modes in addition to the access points identified under questions 4 and 5? If so, please give details of where these opportunities are on the site's boundary

The suggested pedestrian footpath/cycle way along Prospect Lane would encourage an increased use of cycles.

7. What type(s) of housing do you think would be most appropriate for the site from the following list: detached, semi-detached, terraced, flats? Please identify as many types as you think are suitable and explain why.

- a. To cater for the needs and aspirations of a wide community, the site should provide high quality mainly detached and semi-detached dwellings and some terraced dwellings.
- b. There should also be some bungalows and ground floor apartments suitable for elderly/disabled people and perhaps properties suitable for those who wish to downsize within Rowlands Castle, but are unable to find a smaller property close to the village. The need for such accommodation was clearly identified in the Housing Needs Survey undertaken for our emerging Neighbourhood Plan. Such accommodation should include wider doorways, level access, space provision for future internal lifts, accessibility for wheelchairs etc. These features could be provided for at the design stage at very low cost and will allow extended age living whilst still looking like standard housing for all.
- c. The type of housing should accommodate the following tenures: Market (Freehold), Affordable (Social Rent and Intermediate, and age-related).

8. Are there parts of the site that would be more suitable for new homes than others? If so, please give details of which parts (e.g. northern, southern etc.) are more suitable and explain why

- a. When identifying which parts of the site would be suitable for new homes, the housing density of the site should be considered. The density of the housing on the site should be consistent with that of the sites in Rowlands Castle Parish allocated in the EHDC Local Plan (Housing and Employment Allocations) (April 2016) according to the following policies:
 - RC1 - Land at former Rowlands Castle Brickworks, The Drift (now Bailey Road) - Density: **19** dwellings/ha. This area includes an attenuation pond and public open space
 - RC2 – Land South of Oaklands (now Woodlands Avenue and Oak Tree Close) – **19** dwellings/ha. This includes an attenuation pond and public open space.
 - RC3 – Land North of Bartons Road (Eastleigh House Cottages) Havant – **28** dwellings/ha. This does not include an attenuation pond and public open space

The development on the site of the former Keyline Builders Merchants in Rowlands Castle (approved on appeal in August 2014) (now Deerleap Lane) has a density of **13** dwellings/ha and this area includes an attenuation pond and public open space.

The net developable area should accommodate the following:

- Public Open Spaces (including a play area). The existing adjoining sites in Havant do not provide any public open space.
- A transition to a less intense development than that of the existing adjoining sites because it borders the rural countryside and the strategic gap between Rowlands Castle and Havant.
- Sufficient private garden space of, say, on average 40 sq. metres per dwelling
- Provision of SuDS (Sustainable Drainage Scheme) which could require an attenuation pond.
- If foul water drainage is to lead to sewers along Prospect Lane, pumps would have to be provided because the site slopes downwards to the east from Prospect Lane.

The EHDC Draft Local Plan (2017 – 2036) (Regulation 18) proposed for site SA41 a density of between **28** and **32** dwellings/ha which would not accord with the above principles. For example, it would not provide a significant area of POS.

The area of this site is 3.56 ha so, in order to accord with the principles defined at the start of this document, including a Density of **20** dwellings/ha, the number of dwellings that could be accommodated on the site would be approximately 71. The density of a development affects both its aesthetics and the long-term quality of life of its residents and so too dense a development would have an adverse effect. (See NPPF paragraph 122 d) and e)).

b. All age-related accommodation should be constructed in proximity to the access to Prospect Lane to facilitate access to public transport and where it would be on land at about the same level as Prospect Lane. The further East it is constructed the greater would be the slope that would have to be negotiated to reach Prospect Lane. The land closest to Prospect Lane is at an elevation of 40m AOD (Above Ordnance Datum), but it slopes eastwards to 25m AOD.

9. Where should other land uses (such as public open space, new community buildings and shops (if proposed)) be located on the site, in relation to new homes? Please explain your answer.

a. Public Open Space:

- Only the fronts of dwellings should face and overlook the Public Open Spaces (POS). The streets would be in front of the dwellings, and the POS would be on the opposite side of the streets. (Policy S27 b) and e)). See Appendix B, Figures 1, 2 and 3.
- POS must be provided on the site in advance of dwellings being occupied and must be accessible to all including people with disabilities.
- Boundaries of the POS should protect them for their proper use. For example, measures should be implemented to prevent unregulated and anti-social parking.
- Children's Play areas and equipment should be provided. These areas should be located in accessible places that are well overlooked but do not risk unacceptable disturbance to neighbours.
- The POS should meet the needs of the whole community.
- Public seating should be provided.
- A scheme for the ongoing maintenance and management of the POS must be provided.

b. Local amenities:

It would be anticipated that the dwellings on this site would generate a need for amenities (e.g. shops, restaurants, post office) so an assessment of how this increased demand could be met, considering the capacity of the existing local facilities, and the availability of public transport to reach such facilities. However, it may not prove to be practical to provide any such facilities on the site.

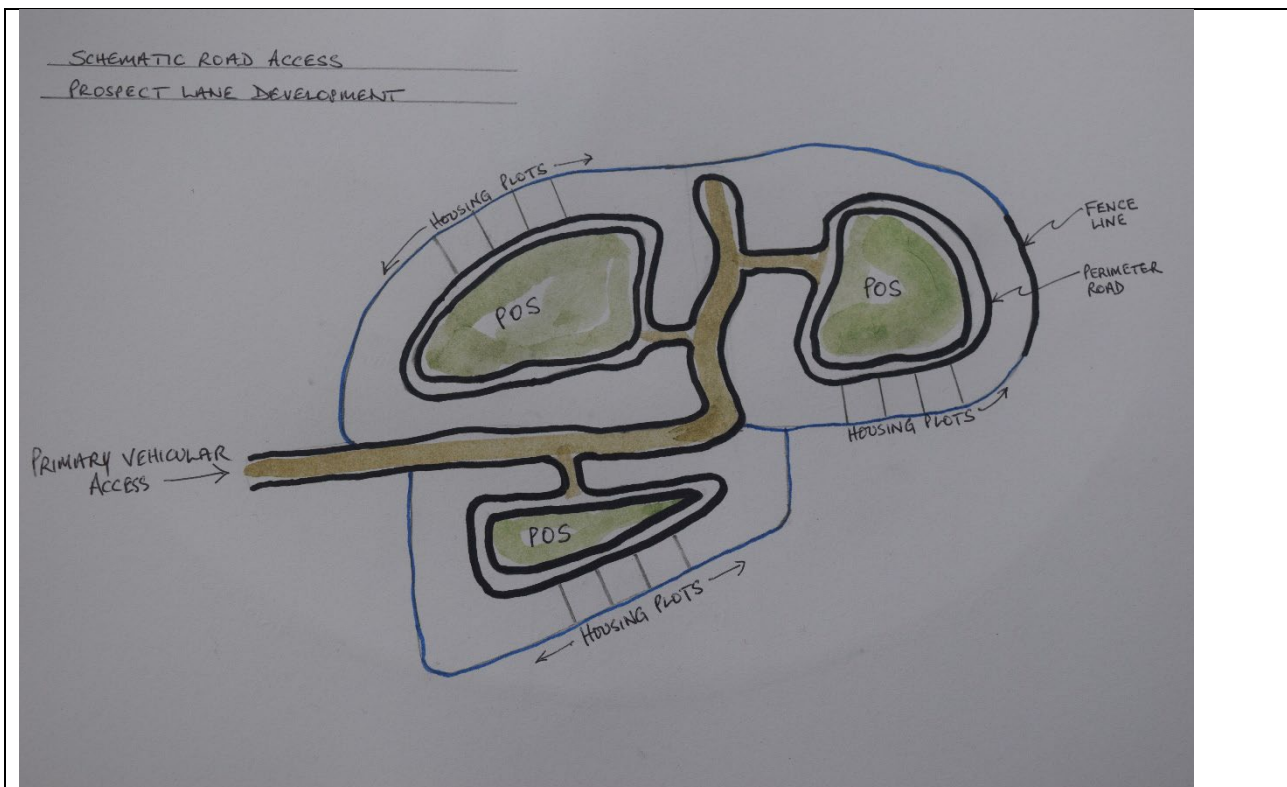
c. Community Facilities

It should be considered what community facilities must be provided on the site.

10. A location plan image of the site at an appropriate scale has been e-mailed to your clerk. If you feel comfortable in doing so, you may annotate this plan (either electronically, if you have access to appropriate software, or by drawing on a printed-out version) to clarify your answers to questions 1-9. If you intend to supplement your answers with an annotated plan or drawing, please upload a scanned copy here.

The following schematic depicts a design that would accord with the responses to the questions in this survey, and the principles defined at the start of this document. Particular features would include:

- There would be no road around the northern perimeter of the site as proposed in the Illustrative Master Plan.
- The existing and proposed planting and woodland features around the boundary of the site would remain as proposed in the Illustrative Master Plan.
- The pedestrian links depicted in the Illustrative Master Plan would remain.
- Public Open Spaces (POS) would be overlooked by the front of dwellings which would be on the opposite side of the road from the POS. See Appendix A.
- The east-west access road would be shorter and, therefore, more visually attractive than that proposed in the Illustrative Master Plan.
- If the rear gardens of any dwellings were to face or adjoin a road, for aesthetic reasons, the boundary could, for example, be a brick wall with shrubs or other landscaping along it.



11. If you were to think about the design of any new streets on the site, how do you think they should appear? You might wish to consider whether the new homes should be set back a constant distance, or whether this should vary; how much tree cover you might expect; how enclosed by buildings the streets should be; how the boundaries of new homes might be dealt with. If desired, please upload any photos of good examples.

a. Design of streets:

- The streets should be curved to provide more visual appeal.
- They should be wide enough to allow cars to pass unimpeded any cars parked along the road. This would discourage the parking of cars partially on the pavement.
- The pavements should be of tarmacadam on only one side of the roads, and of grass on the other to make the street scene more attractive. See Appendix B, Figs 4 and 6.
- To enhance the appearance of the streets (and possibly provide traffic calming), a variety of surfaces should be provided. For example, different surfaces (tarmac, block paving, cobbles) could be provided for each of the three groups of dwellings surrounding the Public Open Spaces shown in the schematic under question 10. See Appendix B, Figure 2.
- The streets should be lined with as many trees as possible to provide shade and to improve appearances, and where possible, incorporate rain gardens to cope with the predicted climate change. The 'Planning for the Future White Paper' stated: ' We will also deliver our commitment to make all new streets tree-lined, by setting clear expectations through the changes to the National Planning Policy Framework which will be consulted on in the autumn, and informed by the outcome of this summer's consultation on the England Tree Strategy'.
- The streets, surface and foul water drainage should be constructed to adoptable standards.

b. Design of housing:

- The development is on the edge of the countryside, within the current 'Strategic Gap' and within the Rowlands Castle parish and should therefore reflect the more rural feel, appearance and sense of place shown in general by properties in Rowlands Castle.
- The design and setting of the dwellings should be sympathetic to the design of the adjoining Prospect Farm Cottage which probably dates from the 19th century.
- The houses should be set back from the road at different distances to provide a variety of appearances.
- The dwellings should be of a variety of different styles ('patterns') and be constructed of a variety of materials which respond to the Rowlands Castle character of red brick and flint in

order to reinforce local distinctiveness. See Appendix B, Figure 5. The other Figures in Appendix B also demonstrate a variety of different styles and the dwellings are set back from the road at different distances.

- Boundaries of properties with the streets should be of the same style of brickwork as the dwelling or a hedgerow.
- The housing must exhibit green credentials which could include:
 - Solar panels and tiles which sit flush with and are well integrated into roofs, rather than panels retrospectively bolted to roofs.
 - Triple glazing
 - Facilities to make use of 'grey water'.
 - Incorporate heat pump systems and under-floor heating in dwellings

12. How would you expect car parking to be dealt with on the site from the following list: on residential plots (e.g. driveway or garage); within parking bays along a street; within a parking courtyard in front of new homes; within a rear parking courtyard; by a mix of these approaches across the site; by another approach (please specify)? Please explain the reason(s) for your choice

- a. Car parking should wherever possible be on residential plots for ease of access by residents and to facilitate the overlooking of parked cars for security reasons.
- b. If car parking has to be provided within a courtyard either in front of or to the rear of dwellings which cannot have a driveway and garage, it should not have to accommodate a large number of vehicles. The following features should be provided to minimise the visual impact of such parking:
 - Between pairs of parking bays there should be a landscaped strip within which small bushes or shrubs would be planted. Arrangements would have to be made for the long-term maintenance of these. See Appendix B, Figure 7.
 - Instead of delineating parking bays with white paint lines, more aesthetically pleasing setts, metal studs or lines of timber should be used.
 - To prevent vehicle parking from visually dominating the streetscape, along the boundary of parking courtyards and streets, brick walls (and not wooden fences) to match adjoining dwellings should be built (except along the entrance to the courtyard) or tall hedgerows should be planted. See Appendix B, Figure 7.
- c. Parking in courtyard to the rear of dwellings should still be overlooked for security reasons. See Appendix B, Figure 8.
- d. Laybys should be provided for use by visitors as along Woodlands Avenue in Rowlands Castle.
- e. Measures to reduce 'residual parking' should be implemented.
- f. Car parking design should accommodate EV charging points either on the plot of a dwelling or in adjacent car parking areas such as courtyards.
- g. Evidence from recent developments in Rowlands Castle is that the residential parking standards in the EHDC Vehicle Parking Standards Supplementary Planning Document (July 2018) do not require the provision of sufficient residential and visitor parking spaces. Therefore, when a planning application is submitted, an assessment should be undertaken of how many parking spaces should be provided on the site.

13. Having listened to, or watched the recording of the developer's presentation about their vision for the site, did you agree with their proposals? Please explain your answer.

- The presentation showed the Illustrative Master Plan, but little explanation was given about it. For example, it was not stated how many dwellings were proposed for the site. To determine that, it was necessary to consult the EHDC Draft Local Plan (2017 – 2036) (Regulation 18) that indicated there would be 100 to 115 dwellings on the site. However, we do not know how much weight (if any) to attach to that plan, because EHDC is now preparing a hybrid Local Plan. Rowlands Castle is developing a Neighbourhood Plan, and we have been informed by EHDC that it cannot refer to the Reg 18 plan because it has not been adopted. Similarly, it carries no weight when planning applications are considered.

- The internal layout shown on the Illustrative Master Plan is not accurately drawn to scale and does not show the objects in their accurate proportion, nor does it indicate private gardens. Therefore, it could be very misleading. If (and that is not certain for the reasons given in the first bullet), the plan indicates 100 to 115 dwellings, as referred to in our response to question 8, the housing density would indicate that it is proposed to provide much less Public Open Space than we would have hoped for.
- The Landscape and Visual Assessment report which we were sent on request after the workshop on 1st September 2021 was very informative and contained comprehensive details and photographs of the key views.
- We would agree with the proposed pedestrian access and links, and the proposed primary vehicular access from Prospect Lane.

By ticking this box, you acknowledge that this form will be submitted to East Hampshire District Council on behalf of your parish or town council and used by the planning policy team to inform the emerging Local Plan. The information you have supplied may be shared with the Planning Inspectorate and published only as part of the Council's evidence base for its Local Plan. All comments submitted as part of the consultation will be used in line with our Planning Policy Privacy Notice and kept according to our Retention Schedule, both of which can be found on our website (www.easthants.gov.uk/draft-local-plan)

Appendix A

Dwelling facing Public Open Space as proposed in the schematic



Appendix B

Figure 1 – Dwellings with fronts adjoining access road and facing Public Open Space – Oak Tree Close Rowlands Castle



Figure 2 – dwellings with fronts adjoining access road and facing Public Open Space – junction of Woodlands Avenue and Oak Tree Close, Rowlands Castle. This also shows different road textures



Figure 3 – dwellings with fronts adjoining footpath and facing Public Open Space, Woodlands Avenue, Rowlands Castle.



Figure 4 – grass pavement on one side of road and tarmac pavement on the other side - Oak Tree Close, Rowlands Castle



Figure 5 – brick and flint dwelling



Figure 6 – grass pavement – Oak Tree Close, Rowlands Castle



Figure 7 – Parking bays separated by landscaped strips – Oaklands Avenue, Rowlands Castle



Figure 8 – Courtyard Parking to rear of dwellings, but still overlooked – Woodlands Avenue, Rowlands Castle

