

# **RESPONSE FROM THE CHICHESTER CITY COUNCIL NEIGHBOURHOOD PLAN STEERING GROUP TO THE CHICHESTER DISTRICT COUNCIL REG. 19 LOCAL PLAN CONSULTATION**

**17<sup>th</sup> March 2023**

## ABOUT THIS RESPONSE

This response to the Chichester District Council Local Plan Regulation 19 consultation is submitted on behalf of the Chichester Neighbourhood Plan (CNP) Steering Group (SG). The CNP has been authorised to provide this response by the Planning and Conservation committee (P&C) of Chichester City Council (CCC).

The SG has delegated authority granted by CCC – the Neighbourhood Plan qualifying body – to prepare the CNP on behalf of all who live in, visit, and work in Chichester. The qualifying body is CCC, and it will approve the draft plan for pre-submission publication at the appropriate time.

CCC currently anticipates that the Regulation 16 version of the Neighbourhood Plan will be submitted to CDC (as the Local Planning Authority) in the first half of 2024.

## ABOUT THE NEIGHBOURHOOD PLAN

The CNP SG is responsible for preparation of the Chichester Neighbourhood Plan up to submission stage and will be an active participant at the examination and referendum stage. As part of the overall process, it is required to liaise with relevant authorities and organisations to make the plan as responsive and as effective as possible. Consensus-building, alignment, engagement, and community-led research are critical elements of the CNP's work.

Furthermore, it has been tasked to gather data from a wide range of sources to ensure that the conclusions reached are fully evidenced and that the aspirations and issues of stakeholders are understood. The work of the SG is supported by Feria Urbanism, an award-winning planning and design practice.

## STRONGER LINKS BETWEEN THE LOCAL PLAN & NEIGHBOURHOOD PLAN

We value the hard work that has gone into the CDC LP to get it to this Reg. 19 stage. It covers a range of diverse topics and has far reaching consequences for the whole district, including Chichester.

We also appreciate that the questions being asked in this consultation are around legal compliance, soundness, and duty to cooperate. We have no comments to make on the legality of the plan nor the duty to cooperate, but we do believe that on

the question of soundness, the need for “positive preparation” requires further investigation before the LP can reach successful adoption. We consider the CDC LP could exhibit greater levels of positive preparation if it contains stronger links with Neighbourhood Plans and that is what our submission focuses upon. We do hope the ideas and suggestions in this submission help improve the CDC LP even further as it provides the necessary framework for a successful partnership that will deliver the Neighbourhood Plan for Chichester.

This response to the consultation concerns the CNP, and this response notes that the Reg. 19 version of the Local Plan makes little or no mention of the CNP in sections where we think it could offer far stronger links.

For example, the Reg. 19 section “Relationship between Neighbourhood Plans and the Local Plan” – paragraphs 1.17 to paragraph 1.22 – focuses almost exclusively on the timing of Neighbourhood Plans (be they prepared or made before or after the adoption of the LP) and housing delivery (how they can assist in the allocation of housing sites). There is no mention of how Neighbourhood Plans can effectively energise communities on issues linked to the built and ambient local environment (such as active transport, pollution, and green spaces) to create well-supported visions for areas of change, set realistic yet ambitious thresholds for design standards and shape and influence inward investment to unlock land and deliver new development of a high standard.

While we appreciate the CNP has yet to reach pre-submission or submission stage, we are looking for a stronger partnership between CDC and CCC over the respective roles of the two statutory planning documents, namely the Local Plan and the Chichester Neighbourhood Plan.

From our research to date, we anticipate the content of the CNP will incorporate a “design-led vision” for various opportunity sites within the plan boundary, supported by a planning policy context where appropriate. We understand from our significant engagement with community groups and organisations that these stakeholders are looking for ambitious, forward-thinking, visual materials that effectively communicate a positive sense of place for Chichester and address many of the perceived planning mistakes of the past. Even at this late stage, the Reg. 19 plan does not provide a visual outcome that is relatable to the wider public. However, we feel that the CNP is well-placed to rise above this challenge with the current local plan and thus provide an ideal companion document to the CDC LP.

## CREATING A DESIGN-LED VISION FOR CHICHESTER

As Chichester is mostly built out from a development perspective the SG is keen to run a series of design-led engagement events – all involving the public, stakeholders, landowners, and other interested parties, as appropriate – to develop a spatial 3-D vision for a series of opportunity sites in Chichester that are likely to be subject to change over the coming years.

Our planned work will enable the CNP process to be a powerful mechanism that leads the debate over the future of these sites, to positively shape change and set out the expectations of the wider community for the type of place we want to live and work in in future. Our goal is that the CNP plan will be the document where this good work is captured, communicated, and given statutory status. This will provide an exciting and aspirational platform for future changes.

We fully expect that this approach to the CNP as described here will be in general conformity with the CDC Local Plan, as set out in the legal provisions that allocate strategic matters to the Local Plan and non-strategic matters to a Neighbourhood Plan.

We appreciate the time sensitivity and complexity of CDC's task to deliver the CDC LP on time and we do not expect that a CNP as described here will hold things up. Working together, we can ensure that both documents align closely and effectively enable the quality delivery both plans aim for.

To this end, we request that the Chichester Local Plan contains references to the forthcoming CNP in the following key chapters:

→ Chapter 2: Vision and Strategic Objectives

Paragraph 2.3. states that the cathedral city of Chichester is the main settlement while paragraph 2.38. says that the emphasis will be upon consolidating and enhancing the role of Chichester city as the plan area's main centre. The role of the CNP in consolidating and enhancing Chichester as the main centre should be referenced here and throughout this chapter.

→ Chapter 6: Place-making, Health & Well-being

This section covers many of the themes we wish the CNP to address at a non-strategic level. We therefore request that a variety of references are placed in this section, alerting the reader to the opportunity that Neighbourhood Plans provide in interpreting and applying the place-making, health and well-being topics at site and neighbourhood level.

→ Chapter 10: Strategic and Area Based Policies

We are pleased to see several references to the importance of design quality (e.g., Policy A2 Chichester City – Strategic housing location) and would wish to strengthen this to include the need for a Chichester-specific design review panel that can input into housing design and planning matters, to improve the on-site results and its wider public acceptability.

In summary, we want references to the CNP in these sections (and others too) to function as “hooks” that will allow the CNP to align most effectively with the CDC LP.

## MEMORANDUM OF UNDERSTANDING

Alongside the addition of hooks to the CDC LP, we seek a collaborative discussion that leads to agreement of a Memorandum of Understanding (MoU) or similar that will help agree the scope, responsibilities, timescales, and deliverables coming through the CNP process. As described above, we anticipate that the content of the CNP will revolve very much around creating a “design-led vision” for various opportunity sites within the plan boundary, supported by a planning policy context where appropriate.

We are keen that the CDC LP team are fully aware of these design-led ambitions and are supportive of them becoming key components of the CNP. We would want our discussions around our preferred neighbourhood planning process and content to be recorded and form the basis of the MoU. This will give both parts of the system – the Local Plan and the Neighbourhood Plan – confidence moving forwards by identifying clear obligations, responsibilities, deadlines, and deliverables.

We are keen that the process and content of the CNP provides significant added value to the CDC Local Plan and becomes an exemplar partner document, providing the site level design details that are necessarily absent from a Local Plan.

## WHAT THE QUALIFYING BODY WILL DO NEXT

A special meeting of the CCC Planning & Conservation committee is due to be held shortly to formalise our position regarding the CNP process and plan content. As part of this, the CNP SG will provide a fuller description of the likely form and content of the CNP, and we can share this with CDC to give officers an insight to the sort of coverage we expect the plan to include.

Alongside this, the CNP SG shall provide a fuller description of the likely process that will be used to generate the content, especially with regards to the areas of change that we propose the Chichester Neighbourhood Plan to address e.g. the collaborative design workshops with CDC and other stakeholders, how we would wish to test possible scenarios with the public and how we may include a series of “mini-vision” statements with illustrations for each of the areas under consideration. Again, we would be pleased to share this preferred process with CDC officers.

## CHICHESTER TOMORROW – A VISION FOR CHICHESTER CITY CENTRE

We acknowledge that considerable work has gone into The Chichester Vision document (October 2017). We also subscribe to the stated aspiration of the document that:

*“Chichester city will maintain its special significance as an economic and cultural centre serving a wide catchment area beyond the plan area. The vision for Chichester city to be attractive, distinctive, and successful (as set out in 'Chichester Tomorrow – A Vision for Chichester City Centre') will be implemented thus ensuring the protection of the city's past while enhancing the future vitality of Chichester as the cultural capital of West Sussex, as a place of learning, and as an entrepreneurial retail and business centre.”*

However, the document is now over five years old and was prepared before the Covid-19 pandemic shifted all sorts of assumptions and expectations around urban centres and how they function. An update to the assumptions behind it is required especially given the way our response to Covid-19 affected working patterns, residential and business requirements, and retail habits. For the CNP work to be successful and have the right level of quality, we will need to update much of the ground covered by the 2017 Chichester Vision, and we would like to offer the results of that work to CDC to help underpin the CNP, which in turn begins to articulate and interpret the strategic content of the Reg. 19 CDC LP.

The CNP SG includes expertise in the fields of urban design, architecture, landscape architecture, project management, development and construction innovation, and city planning skills. The team has an international reputation for successful delivery, has vast experience of similar work elsewhere, and has deep expertise. These characteristics provide CDC with a team with the ability and capacity to run the process of updating the Chichester Vision work.

It is anticipated that the broad CNP team will be able to address the gaps and outdated aspects of the current Chichester Vision document which include the following issues:

1. It does not address anything other than the commercial characteristics of the core Chichester area. It does not address the needs and aspirations of the whole city area, which is also the boundary of the CNP.
2. It does not address significant areas of change or areas outside of the commercial core.

3. The document lacks specificity. For example:
  - “*The Vision will serve as a template against which to test new projects, policies and proposals emerging for the City Centre*” – yet the document is too incomplete and subjective to fulfil this purpose.
  
  - “*Provide clear objectives to guide investment into the City Centre, so that all current and future development proposals, policies, strategies, ideas and opportunities have due regard as to how they might relate to each other, to the wider City and to adjoining areas.*” – yet there are no clear objectives, and we cannot find the criteria to measure achievement of objectives.
  
  - It does not contain specific plans, while there are aspirations, there is a lack of detail of what the “vision” is in terms of land use nor how the vision will be delivered in three-dimensional terms. No plans or massing studies have been included in the final document.
  
4. The current “vision” is based on incomplete research. The “City Centre Audit” on which the Vision is based is primarily a study of street furniture and signage rather than the necessary broader audit of character and function for the whole parish area. (*City Centre Audit – BroomeJenkins – June 2016*)
  
5. The comparator towns and cities used in the Chichester Vision are too large. Most of the city comparators used (Guildford, Exeter, Winchester, and York) are a different scale to Chichester and need to be reconsidered. Better city comparators might be Lincoln, St Albans, and Chester based on size, geographic area, heritage, and their Roman origin. International comparators such as Basel and Speyer (based on cultural similarity and spatial footprint) are accessible to us. These comparators can help position Chichester alongside a more aspirational peer group.
  
6. The Chichester Vision document predates CDC’s announcement of a climate emergency in July 2019, when “the council announced its commitment to taking urgent action and asking others - residents, businesses, partner organisations, and the Government - to help and support us. We developed a Climate Emergency Action Plan, in which we set a target of a 10% reduction in greenhouse gas emissions year-on-year until 2025.” There is interest to explore how active travel can change the City Public realm in what is a relatively compact geographic civil parish area with a lower, possibly even zero emissions aspiration to support CDC’s Climate Emergency goals. The CDC LP repeats climate aspirations to do this but could benefit from greater specificity about stated actions to achieve it. For example, the CDC LCWIP (Local Cycling and Walking Infrastructure Plan) has many excellent schemes which will benefit the CNP plan area but there is no specific mention in the CDC Local Plan nor policies protecting, prioritising, safeguarding and funding the LCWIP.

7. The greatest weakness of the 2017 Chichester Vision based on the CNP's research so far, is that it lacks real public recognition and buy-in. One of the roles and responsibilities of the CNP Steering Group is to *"consult as widely and thoroughly as is possible to ensure that the draft and final neighbourhood plan is representative of the views of residents."* We anticipate that the CNP will help to smooth and ground some of the ideas in the Chichester Vision work, bring it up to date, make it specific and enable deep Chichester public input. Examples of our engagement work with Chichester stakeholders includes the recent Chichester Community Collaboration Forum, Business Forum, and other engagement events.

Most of what is put forward in the Chichester Vision is tactically focused or relates to initiatives which have yet to be realised. From our recent but brief discussions with the CDC LP leadership team, it appears that our views on the future of Chichester city centre are probably aligned but we feel the CNP process and programme of work is likely to be better than the LP at developing the detailed strategies and tactics of place-making. We would also provide ways to identify how the vision can deliver tangible results and make it more compelling for a public audience. This is why we feel the CNP is an ideal process to update and replace the 2017 Vision and to effectively partner the CDC LP.

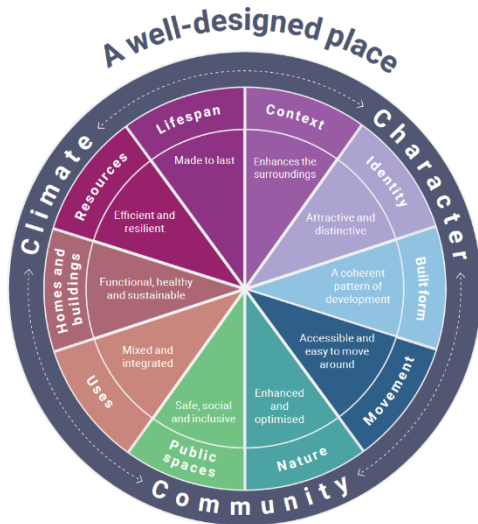
8. Finally, as the land within the boundary of the Chichester neighbourhood plan is mostly built-out from a development perspective, the role of brownfield redevelopment becomes ever more vital to directing future development. We believe there are numerous, publicly acceptable, potential development sites which will both improve the quality of the built environment in Chichester (e.g., improving its gateways) and unlock economic potential for the district. We wish to use the CNP process to unlock these sites.

Paragraph 2.39 of the Reg. 19 LP states that Chichester city will maintain its special significance as an economic and cultural centre serving a wide catchment area beyond the plan area. The vision for Chichester city to be attractive, distinctive and successful (as set out in 'Chichester Tomorrow – A Vision for Chichester City Centre') will be implemented thus ensuring the protection of the city's past while enhancing the future vitality of Chichester as the cultural capital of West Sussex, as a place of learning, and as an entrepreneurial retail and business centre.

We request that paragraph is updated to refer to the forthcoming CNP, and not the existing vision document. Likewise, paragraph 10.2 and Policy A1 should be updated to reflect the role the future CNP will play.

## NATIONAL DESIGN STANDARDS

The NPPF “National Design Guide” is already an important input to the way we are thinking about the CNP. It is a powerful tool, and we will use this to strengthen and tie together the various strands of the existing Chichester Vision to make the CNP a compelling and well-supported document. It is encouraging that these national design principles are also intended to be at the core of the CDC Local Plan and hope our further collaboration will draw these to the fore in both documents.



## CONCLUSION

We support the hard work that has brought the CDC LP to the Reg. 19 stage. We are now looking to create the strong partnership working arrangement that will help create an exemplar neighbourhood plan for Chichester that will add the design-led detail and widespread community support to shape and influence this historic settlement at the heart of the district.

Signed – 17.03.23

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**John Pegg** – Member of the Chichester Neighbourhood Plan Steering Group, award winning landscape architect, urban designer, Senior Lecturer in Architecture & Urban Design at Portsmouth University

**Councillor Sarah Quail** – CNP Qualifying Body Interface for CCC. Chair of CCC P&C. Former Chair of the Portsmouth Diocesan Advisory Committee for the Care of Churches. Former Member of Cathedrals Fabric Commission for England

**Richard Eastham** – award winning planning and design advisor to the Chichester Neighbourhood Plan Steering Group