

7 February 2019

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Dear Sir / Madam

Chichester District Council Local Plan Review 2035 Preferred Approach Consultation Representations on Behalf of the Church Commissioners for England

We write on behalf of our client, the Church Commissioners for England ("the Commissioners"), who are long-term landowners in the Chichester area. The Commissioners manage a well-diversified investment portfolio to support the Church's work across the country. We understand that Chichester District Council ("the Council") is undertaking a Local Plan Review and is currently inviting responses from stakeholders to its Local Plan Review 2035 Preferred Approach consultation.

The Chichester Local Plan Review is being undertaken to update the development strategy and development management policies for the District of the current Local Plan 2029 up to the period 2035. The Commissioners supports these general aims and is pleased to be given the opportunity to comment.

These representations focus on the key policies of relevance to the Commissioner's small scale sites and mainly focus on the development management policies. These are submitted alongside Lichfields Representations (ref. 15727/04/SSL/SWk) which focus on the Commissioner strategic portfolio. The key policies of relevance are addressed below.

Policy S3: Development Strategy

The Commissioners generally support the spatial principle set out in Policy S3 'Development Strategy' and are particularly supportive of its objective to support thriving villages and rural communities, although urge that this is not just focussed primarily in the north of the plan area but across the whole of the District. Rural areas often need new forms of development and housing to continue to thrive.

It is encouraging that the Council recognise that to meet its housing target, the distribution of development may need to be flexibly applied around Chichester City and settlement hubs. The Commissioners urge however that the term, "settlement hubs" are not just limited to settlements set out in policy S3 or S2 but also to smaller rural settlements which require new housing to support their future needs.

The Commissioners are supportive of the general principle of making provision for small scale development, however, they consider that this should not just be primarily focussed around Service Villages but housing

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should also be allocated in the countryside where sites are able to demonstrate that they are sustainable, in line with Paragraph 68 of the NPPF.

Rural locations in the countryside also often include unused agricultural buildings which are suitable for conversion to residential use. The principle of the conversion of existing buildings is supported by the Government and this should be referenced within Policy S3.

Taking a flexible approach ensures that housing sites can be considered appropriately on a case-by-case basis and can assist in bringing forward sustainable development which could otherwise be discounted through restrictive Local Plan policies. In line with Paragraph 77 of the NPPF, a flexible approach should be adopted by the Council and development should be supported in rural areas where it will enhance or maintain the vitality of rural communities.

The Commissioner's consider that there should be even greater flexibility within the plan to enable appropriate sustainable small scale development across the whole of the Council's settlement hierarchy to come forward.

Policy S5: Parish Housing Requirements 2016 – 2035

The Commissioners agree with the Council's approach in identifying small scale housing to help provide for the needs of local communities as this is supported by the NPPF. Small and medium scale sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly.

Whilst the Commissioners support the Council's approach of intervening to allocate sites under a Development Plan Document if draft Neighbourhood Plans have not been submitted within 6 months of adoption of the Local Plan, they are concerned that this takes time and could prevent sustainable development coming forward in the meantime. The Commissioners therefore urge that the status of Neighbourhood Plans and other Development Plan Documents does not prevent new sustainable housing coming forward in these Parish's.

The Commissioners supports the Council's approach of allowing flexibility to the housing numbers of individual Parish's, however, on the basis that the Council are promoting minimum numbers, the Commissioners urge that revisions only relate to increases in housing numbers rather than reductions, unless there is strong evidence to indicate otherwise.

Policy S6: Affordable Housing

Whilst the Commissioners recognise the value of affordable housing they do consider that policies around affordable housing should not be too restrictive or onerous. The Council should recognise that requests for affordable housing can impact the viability of schemes and are not always sought after, especially in small villages. Equally, where affordable houses are sought after, planning policy should encourage and allow sites to come forward for residential development. This will increase housing supply helping to meet demand. Planning for a mix of housing scales, types and tenures to meet the identified housing need and demand should be flexible enough to allow for these variations.

Policy DM19: Chichester Harbour Area of Outstanding Natural Beauty (AONB)

The Commissioners support the general principles of Policy DM19 which seeks to protect the natural beauty and distinctiveness of the AONB. However, they urge the Council to ensure that where new suitable development is proposed in the AONB, its designation alone is not used as a reason to prevent sustainable development coming forward.

If it can be demonstrated that proposals have successfully addressed the Chichester Harbour Conservancy AONB Management Plan Document's requirements, planning permission should be granted without delay.

The policy requirements should also be considered proportionally to the scale of the proposed development. The re-use and enhancement of existing buildings in such areas should be considered favourably as they already form part of the local features of the AONB.

Policy S23: Transport and Accessibility

The Commissioners support the aims of Policy 23 and support the Council's encouragement of ensuring that development is located and designed to encourage sustainable modes of travel including alternative modes of travel to the private car. However, the Commissioners also recognise that the car is vital to many in rural locations in supporting local economies, and for many people it is a lifeline. Whilst planning policies should encourage alternative transport modes, they should also acknowledge that for many residential developments in rural locations to be sustainable, car transportation is required. Policy S23 should not be overly restrictive on the use of car transportation modes in these locations.

Policy S22: Historic Environment

The Commissioners are supportive of the aims of Policy S22, however, request that further supporting text is added around Point 4 which encourages the Council to take a positive approach to the improvement of heritage assets which are identified at risk or vulnerable to risk. The Commissioners urge the Council to make specific reference to supporting development proposals which bring disused or redundant designated and non-designated heritage assets back into meaningful use, such as underutilised agricultural barns.

Policy S24: Countryside

The Commissioners support the first two points of Policy S24 and agree with the Council that the countryside plays an important role in providing a setting for the plan area's settlements. An important component of this setting relates to historic farmsteads and their agricultural buildings, which can be found across the district. However, many traditional agricultural buildings are no longer fit for commercial purposes and are therefore at risk of falling into disrepair. The Commissioners therefore urge the Council to make provision within the supporting text which promotes the protection of existing traditional barns/ agricultural buildings through sensitive re-use.

Policy DM21 Alterations, Change of Use and/or Re-use of Existing Buildings in the Countryside

The Commissioners support the main objective of DM21, however, they urge more flexibility to the policy to make it workable and to avoid existing disused or redundant buildings lying empty where they do not strictly meet the criteria of the policy.

The policy should acknowledge that there are many disused or redundant buildings in the countryside and that whilst their general form remains intact, they may not technically be considered structurally sound. Significant works may therefore be required to bring the building up to standards for re-use, even if these works do not change the overall form of the building. Paragraph 79 part c) of the NPPF supports the reuse of these buildings provided their redevelopment would enhance their immediate setting. The current wording of part 1 is restrictive and could prevent the reuse of such buildings, resulting in a significant number of buildings being left empty and falling further into disrepair and contradicting paragraph 79 part c) of the NPPF.

The policy will prevent the re-use of existing buildings despite this being a sustainable form of development and instead guide new development to green fields elsewhere.

Part 5 of the policy is also almost as redundant as Part 1 as it restricts the significant extension, alternation or rebuilding of existing buildings. The Commissioners seek that Part 1 is reworded to allow more flexibility and is merged with Part 5. The Commissioners request that the policy is reworded as follows:

“The building is capable of conversion and is able to maintain its form, bulk and general design. Where alterations are proposed, the resulting form, bulk and general design of the building is in keeping with its surroundings and the proposal and any associated development will not harm its landscape character and setting.”

The Commissioners agree that economic and community uses are needed to ensure a mix of uses come forward and generally support the requirement of Part 2. The Commissioners however, urge that the Council takes a proportionate approach to the level of information required when assessing schemes.

The Commissioners agree with the final paragraph, although consider that it would be helpful to acknowledge the special circumstances within the policy.

DM22 Development in the Countryside

The Commissioners support the general principles of Policy DM22, however, they urge the Council to instil further flexibility into the policy so development in the countryside is not just restricted to where there is an identified local need. Small scale housing in small rural settlements is required but is not always identified in the local plan because it falls below the 6 unit threshold as identified above. As such, regard should be given to the national context and the current widespread undersupply of housing. The Commissioners therefore urge the Council to adopt a flexible approach to allowing development in the countryside where it can be demonstrated to be sustainable and supports the vitality and character of rural areas.

Conclusion

In summary, the Commissioners are pleased to have the opportunity to provide comments in relation to the Chichester Local Plan Review Preferred Approach consultation. The Commissioners broadly support the document and its aims and consider smaller sites should be carefully considered during the preparation stages of the plan. Greater flexibility in the detailed development management policies specifically in relation to reusing existing buildings should also be considered to ensure sustainable development can come forward.

Should you have any queries on this correspondence, please contact myself or Jonathan Hoban on 020 7936 3000 or jhoban@deloitte.co.

Yours faithfully,



Caroline McDade
For Deloitte LL

