Evidence for Local Green Spaces

Letter to CDC of December 3, 2024

Dear Tony

What is not well enough understood by the District Council is the amount of effort a Neighbourhood Plan calls on from a team of volunteers, most of whom are not well versed in planning matters or well disposed to the bureaucratic procedures of NPs. We are about to begin the fifth year of this project and our enthusiasm is waning.

Valerie and our consultant have helped us get to the Reg 14 stage of the process. An essential part of their support should be at this stage to facilitate the Reg consultation. Oneil Homer tuned the policies to ensure compliance with the emerging plan and proofed the document. I would have expected CDC to have checked the evidence from the start. In fact it was checked at intervals during the consultation. As a result I have had to extend the consultation three times and might have to do a fourth. That has meant changes to the website, repeated letters to landowners, adjacent parishes and some 50 statutory consultees many of whom have no interest in our planning. In five weeks I have had precisely five responses including one 'no comment'.

This has meant work, repeated work for no very good purpose.

We have still as a steering group to decide on the need for Analysis Sheets as Local Green Space evidence when there is plenty of evidence on the site already, evidence of the decision making procedure we have used to identify the LGS, including clear maps, example of letters to landowners, a commissioned report. Evidence is not an absolute concept. It's a matter of judgment.

I continue to think as a former member of CDC that you should allocate a member of your team to a parish to work part time in a structured role to take some of the pressure off people who have other lives to lead and to ensure efficiency and expeditiousness in the development process itself.

Stephen

Dear Stephen,

I do apologise if my previous email came across as unappreciative of the time and effort that I am aware volunteers put into the plan. I am well aware of this from working with other Neighbourhood Plan Groups. The District Council will continue to support you and others with the neighbourhood planning process, although we do need to recognise that the resources of the CDC Policy Team are finite and will be under pressure from other workload streams.

The response to the Neighbourhood Plan consultation from the District Council is multifaceted and includes a number of internal consultations with various departments and officers, which Valerie then collates alongside time she has to put aside to review the plan herself. In trying to be helpful Valerie has passed on key potential issues that may impact the consultation itself, as they have arisen, to ensure you are aware of them as soon as possible and to have the opportunity, should you so wish, to take some form of mitigating action. I can appreciate, however, how the resultant sporadic nature of the comments may have been frustrating, but they were provided with the best of intentions.

I agree with the point you make about the need for the publishing of evidence being a judgement call, it depends upon the nature of the evidence , whether it goes to the heart of a policy, and whether that policy has sway over future land use, etc. This is also why it is very difficult for us to provide a comprehensive view on potential unpublished evidence without considering the plan in some detail or being made aware of the existence of that evidence. We have provided you with our view on what currently unpublished evidence the Parish Council could potentially be criticised for in not making available at this stage (by parties interested in related policies). However, the judgement and decision is ultimately yours, we are not telling you that you have to publish it at this stage, just that it would be best practice to do so. O'neil Homer may be able to offer you a second opinion if that would be helpful to you coming to a decision.

All we need to understand at this point is whether you intend to publish and extend the consultation or not.

Regards

Tony Whitty
Divisional Manager
Planning Policy
Chichester District
Council

December 4,
2024
Dear Stephen,

It is conventional for NP groups to publish the evidence associated with the designation of Local Green Spaces. This also applies to the evidence supporting the designation of Non-Designated Heritage Assets (Local Heritage Assets). At the end of the process when the ONP goes through Examination, the Examiner will decide whether the LGS and LHA meet the criteria for designation. CDC and any other consultees including landowners will be able to put their opinions forward on whether the candidates meet the criteria. Therefore, it is usually in your interest to make your arguments/evidence publicly available, but I am not entirely sure what the 'consequences' would be of choosing not to publish this evidence as most Parish Councils do this as a matter of course.

Matt Jennings
Planning & Development Consultant