

Chichester City Council

Neighbourhood Plan Advice

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Introduction

1. Chichester City Council ('CCC') asked Steve Tilbury Consulting to provide advice on whether it should move forward with preparing a neighbourhood plan for the city of Chichester, and, if so, whether previous work on a neighbourhood plan had produced any material which could be of value in that process.
2. In preparing the report I discussed planning issues, priorities and relationships between local authorities with officers of the City Council, councillors Gershater, Apel, McHale, Butler and Miall, officers in the planning policy team at Chichester District Council, and Richard Eastham of FERIA Urbanism whose company had been a consultant on earlier neighbourhood plan work.
3. The background for a decision about a neighbourhood plan in Chichester is complex. Chichester District Council ('CDC') has been advised that its emerging local plan ('eLP') is likely to be found sound (subject to the proposed modifications) following its examination by the Planning Inspectorate. It is likely to be adopted early in 2025 but work on a follow up plan will have to start almost immediately. A new version of the National Planning Policy Framework ('NPPF') and method for calculating housing need was issued by the government on the 12th December 2024. Confirmation of changes to the way that local plans are prepared is likely during 2025, whilst the December 2024 devolution white paper lays the ground for changes in the structure of district and county councils which are now under active discussion. For at least the next 12 – 18 months, local government and the plan making system will be in a considerable state of flux and uncertainty.
4. The parish of Chichester, the area administered by CCC, was designated as a neighbourhood plan area in October 2019. It consists of the city of Chichester itself, with a small amount of surrounding hinterland. Since then, two 'generations' of a neighbourhood plan group, set in motion by CCC but independent of it, have attempted to develop a neighbourhood plan. Despite their efforts, and considerable expense, neither group came close to drafting policies or delivering a draft document, and earlier in 2024 CCC formally wound up that process. It is now considering whether to start again, how to do so, and what use might be made of material that has been commissioned and prepared since 2019.

Why might Chichester want to have a Neighbourhood Plan?

5. The statutory relationship between a neighbourhood plan and a local plan, and therefore between a neighbourhood plan body and the local planning authority (which is CDC) is relatively straightforward. Once it is formally approved following independent examination and referendum, a neighbourhood plan forms part of the

statutory development plan for the area. It is the only process by which a local community can create development plan policies. However, a neighbourhood plan must be 'in conformity' with the strategic policies of the local plan prepared by CDC – particularly those policies relating to housing and major development. In other words, although it has the same legal status once it is 'made' (the term for it being approved and brought into effect) it cannot be made unless it follows the lead of those strategic policies.

6. The most important (and unique) benefit of a neighbourhood plan is that it creates policies which help shape planning decisions in the area. These usually add detail or emphasis ('granularity' as it often referred to) to policies in a local plan, so that they better reflect specific local concerns or circumstances, such as housing need, character, design or local infrastructure. A neighbourhood plan can identify and give protection to sites of particular importance for recreation, biodiversity or landscape setting.
7. Neighbourhood plans can also be used as the mechanism by which sites are chosen for the number of new dwellings which a local plan requires to be provided in an area, the process known as 'site allocation'. This is not compulsory; neighbourhood plans do not have to make site allocations although as mentioned below, there is a difference between those which do and those which do not.
8. There are two specific additional benefits of having a neighbourhood plan. One is that where the Community Infrastructure Levy ('CIL') is operated (which it is in Chichester district) a neighbourhood area will receive 25% of CIL receipts from qualifying development and there is no cap on the total amount which can be paid over. This is a redistribution of CIL between local authorities, it does not mean that developers pay any additional amount. How beneficial this would be to CCC will depend on how much qualifying development is likely to take place in the area bearing in mind that large scale development is often 'carved out' of CIL contributions so that infrastructure can be provided through Section 106 planning obligations.
9. Secondly, if an area has a neighbourhood plan which allocates at least one site for development and which is less than 5 years old, there will be a reduced likelihood of planning permission being given for housing development on sites which are not allocated in the development plan.¹ It can help to resist planning permission being granted for speculative development. This is not an absolute guarantee of protection, but it has proved effective in many areas.

¹ This is set out in Paragraph 14 of the NPPF

10. This formal relationship is far from the whole picture in a place like Chichester. The city is by far the largest and most complex settlement in the CDC area. It is the main centre for retail, economic and cultural services, serving its own residents and a much wider catchment population. Important as they are, none of the other villages and small towns in the district has the same significance for the economic prosperity of the district, or the delivery of services and facilities to residents, that the city does. The development and change related issues that arise in Chichester are likely to be more numerous, greater in significance and more complex because of the number of intersecting factors and importance of the outcomes. CDC itself is therefore, not unreasonably, much more likely to want to maintain direct control over what, when and how things happen in the city than it is in any other part of the district.
11. For CCC, as the parish council for the city area, Chichester is home. It has its own views about what is important to residents and priorities for action. Whilst it provides important services and representation in the city, CCC only has the powers and duties of a parish council whilst CDC has the bulk of statutory and financial influence. A constructive and positive working relationship already exists to some degree, but it would be surprising if two groups of people faced with important decisions about the future of the area they represent shared exactly the same outlook.
12. Preparing a neighbourhood plan might be seen as a process by which Chichester residents, via CCC, can exercise a greater level of control over what happens in the city as an alternative to relying on the leadership provided by CDC or other large organisations. That appears to be at least one of the themes which drove previous work on a neighbourhood plan.
13. In my view it is a mistake to see a neighbourhood plan in that way. The preparation of a neighbourhood plan should provide both the local community and the local authorities which represent them with a mechanism to agree where additional or better planning policies are required and work cooperatively to produce them, not to wrestle over control of planning policy or the vision for a place. That is particularly true where there is such a close 'territorial' relationship between the local planning authority and the neighbourhood plan area.
14. Vigorous debate, community engagement and testing of alternatives should always be part of a plan making process. That is healthy and desirable, and I am not suggesting that reaching a constructive and positive conclusion is a matter of everyone agreeing to hold the same views. But that debate must be built on a shared understanding of what a neighbourhood plan can and cannot do (in technical and political terms), and whether it is the right mechanism to use for the purpose.

15. That brings us to the central question of what the scope and purpose of a neighbourhood plan for Chichester might be and whether there is sufficient need to prepare a neighbourhood plan to justify the effort. Superficially, there are many reasons why it might seem desirable to create additional or more detailed planning policies for the city. However, it is important to look hard at whether a neighbourhood plan would, in reality, make a difference to local outcomes, and specifically those which CCC would wish to influence. The very complexity of the way the city operates, and decisions are made might be a reason why a neighbourhood plan would not create substantial benefits or be deliverable in a reasonable timescale.
16. That is important, because, as CCC knows only too well, producing a neighbourhood plan would require considerable time from individuals, probably a significant financial commitment and it would absorb a certain amount of officer time. That time and money could be spent on other things, it has an opportunity cost, and if those other things might have more value to the residents than a neighbourhood plan then that must be a consideration for CCC.

Finding Space in the Policy Territory

17. Precisely because Chichester is historic, important and complex it is already subject to a large amount of planning and planning related regulation, some of it very detailed. These exist to ensure that change and development is managed carefully and the assets of an historic settlement are protected and conserved. Together these policies and regulatory processes create a network of decisions (in the sense of decisions having been made that these are the right policies to have) and choices already made on behalf of the city. In Chichester (as in any other historic city) these often overlap and intersect, and of course they reflect the interests of the organisations and public bodies which are responsible for making them which do not always align neatly.
18. A neighbourhood plan should have its own very clear purpose in this policy territory – it should do something which needs to be done (its ‘positive purpose’) and which is not already being done. Crucially of course the neighbourhood plan needs to be the right mechanism by which to accomplish this. If there is no positive purpose or it is not an appropriate mechanism it may be of little added value and not genuinely worth the time, effort and money it takes to produce.

19. Several important policy documents currently help to define the future of Chichester:

The National Planning Policy Framework and other Planning Reforms at National Level

20. Every local level planning document and set of policies operates within the scope of how the government organises the planning system and the objectives it sets. The government determines not only its only policies and priorities, but also the structure and function of the system and what is ‘allowed’ at local level.
21. A neighbourhood plan cannot rewrite national policy or ignore its requirements. That is relatively straightforward to navigate, but more of a problem at the moment is that the planning system is undergoing a necessary but disruptive process of update and upheaval. Plan making processes, housing targets and many individual policy areas are either changing, under review or review is promised for later. That has a knock-on impact on what local planning authorities, such as CDC, themselves have to do and what advice they can give regarding the content of neighbourhood plans.
22. Although these planning reforms leave the role and purpose of neighbourhood plans essentially untouched – in fact in some ways reinforced – they are resetting the relationship between local and national planning policy and until that process is complete it will be a difficult time for complex neighbourhood areas, like Chichester, to bring forward a neighbourhood plan.

Chichester Tomorrow – Your City Your Vision

23. Chichester Tomorrow, produced in 2017, is a very high level but valuable overarching statement of how the signatories would like Chichester to develop and position itself in the future. It is cited by the emerging local plan (‘eLP’) as providing a vision for the city (and its influence on the wider area). The vision does not belong to any individual organisation (which is an advantage) and it could be updated at any time, but as an overarching document it has an important role in defining what the purpose of policy and decision making should be.

The Local Plan

24. The local plan is the most important planning document in any area, because it provides the policies against which individual planning decisions must be taken. It is much more than just a regulatory document, because at least some of those policies are derived from a vision of how the area should develop and priorities for growth and

conservation. CDC's eLP has recently been tested at examination hearings by a planning inspector.² The inspector has indicated that with agreed modifications the plan will be 'sound' – meaning fit for purpose according to the government's requirements – and it should become the adopted plan, replacing the current version, sometime in 2025.³

25. The eLP contains policies which apply everywhere in the district, but also specific detailed policies for Chichester itself such as a retail, employment and educational centres and for specific sites, including those within the Southern Gateway. Taking its lead from Chichester Tomorrow, the eLP contains a very specific and detailed vision for the function and purpose of the city. The eLP has been widely consulted upon and tested and its strategic vision and the policies which flow immediately from that – such as the distribution of housing or role of major sites could not be 'replaced' by alternative policies in a neighbourhood plan. A neighbourhood plan cannot prevent CDC from making new strategic housing allocations in a subsequent local plan. The effect of the government's planning reforms is that CDC is very likely to have to start work on its next local plan (the one which will replace the eLP after it becomes the adopted local plan).
26. The eLP identifies a requirement for 270 new dwellings in the Chichester neighbourhood area over and above those included on specifically identified regeneration sites. These are to be identified either through a neighbourhood plan, or directly by CDC through a 'daughter' development plan document.

The Chichester Regeneration Strategy

27. In September 2024 CDC approved a new Regeneration Strategy ('CRS') for sites in Chichester, which complements the eLP. Although not a part of the statutory development plan, the CRS contains a detailed set of objectives for major regeneration sites and represents a very important statement of vision and desired outcomes. It is designed to identify what would and would not be acceptable and is partly an advocacy document to encourage and influence commercial interest in those sites.

² To be precise, two individual inspectors working jointly

³ I have therefore concentrated on the policies of the eLP rather than the adopted plan because the eLP is so close to adoption and these will be the relevant local plan policies for any future neighbourhood plan to engage with.

Conservation Area and Article 4 Direction

28. A large part of the centre of Chichester is designated as a conservation area which means that it is subject to somewhat greater planning controls to protect its character and historic value. Some permitted rights are automatically ‘switched off’ in conservation areas, and CDC has also made an Article 4 direction which removes other permitted development rights and means that a full planning application is required before they can be approved. Within the conservation area in particular, many of the buildings and sites are subject to statutory protections because of their historic or architectural significance.

The emerging Chichester City Council Plan

29. CCC is in the process of producing a 5-year plan to set out its priorities to improve local services and facilities. Although this not a planning policy document and focuses mainly on a wide variety of non-planning issues, it is still important because many of the quality-of-life issues that CCC has identified are as important, if not more important, to many residents than those which might feature in a neighbourhood plan. They may consider that these should be the priority for time and money to be spent by CCC.
30. Taken together these policy and vision documents (along with other regulations and statutory protections) provide a dense web of planning and planning related policies covering the city. They define the likely outcomes for individual planning applications and for pursuing the redevelopment of individual sites. A considerable amount of the content and local detail of a typical neighbourhood plan is already found in these documents. A neighbourhood plan for Chichester could perhaps update or finesse them, but a considerable amount of negotiation might be required, particularly with CDC, to reach agreement on how this would be done.
31. I am not suggesting of course that CCC collectively or members individually agree with the content of all of these other plans or policies, or cannot present viable alternative policies or approaches. But unless a neighbourhood plan is the appropriate (both technically and ‘politically’) mechanism for CCC to modify them, there is no purpose (and some danger) in trying to do so and the process will almost certainly fail again.
32. Where then might a neighbourhood plan for Chichester be most likely to offer something positive and additional to this existing policy framework which it would be able to deliver?

To Make Housing Site Allocations

33. As mentioned above, the eLP has a requirement for 270 dwellings to be allocated within the Chichester neighbourhood area over the plan period, in addition to those on specific development sites.
34. Deciding the allocation of sites to meet a neighbourhood housing requirement is one of the important functions a neighbourhood plan can fulfil. Local communities are often keen to have the final say about which available sites they would prefer to see developed given the chance to do so. But there is no requirement to produce a neighbourhood plan just to make site allocations, or even to make site allocations in a neighbourhood plan when they are required if there is no desire to do so.
35. In my view, there would be little practical purpose in a neighbourhood plan taking on responsibility for the site allocations required by the eLP. It should be left to CDC to undertake this work and decide on the allocations.
36. My reasons for this conclusion are:
- the number of sites in the CDC HELAA from which to choose is small and there are unlikely to be any which have not been identified.
 - the criteria by which sites should be evaluated for allocation is tightly defined in the eLP and by national planning guidance. The outcome of the process is likely to be very similar whether it is neighbourhood plan led or by CDC through a development plan process;
 - site allocation through a neighbourhood plan can be challenging and is not to be considered lightly;
 - if CDC carries out the site allocations process it must still consult widely and take account of local views before reaching any decisions.
37. The only reason there might be for including site allocations in a neighbourhood plan (if there is to be a neighbourhood plan at all of course) would be if there was a broad political consensus that residents in Chichester expected and would only support a neighbourhood plan which did so. I did not form the impression that this was a strongly held view, but even if I had, I would still have made the same recommendation. I believe CDC would be content with that decision and would, in many ways, prefer to take responsibility for the process. They have the resources and expertise to do so.

To Shape the Regeneration of Chichester on a Site-by-Site basis

38. A neighbourhood plan incorporates policies relating to specific sites, including those for large scale regeneration. However, where a local plan already has detailed policies about individual sites or future uses of a strategic nature, a neighbourhood plan cannot rewrite these or try to impose different outcomes.
39. I appreciate that there are differences of perspective, sometimes quite sharp, between CCC and CDC about the approach to regeneration and specific regeneration sites. But it would be a mistake to believe that a neighbourhood plan can be used as a mechanism to redefine uses or outcomes established by the local plan and other strategic documents.
40. If there were agreement between the CDC and CCC that neighbourhood plan policies might be used to add more detail and definition to the broader local plan policies then that would be constructive and potentially useful. But CDC already consider the site-specific policies in the eLP to be as detailed as development plan policy usually goes (which I agree is correct). There is likely to be a need for more detailed masterplans or development briefs in due course, but these are different types of documents for a different purpose, and would themselves provide the opportunity for public engagement and consultation.
41. Were CCC to try and set out an alternative to the CRS via a neighbourhood plan it would run into serious difficulties and would be resisted by CDC. CCC clearly should have a role in shaping that strategy and the approach to individual sites, but the more appropriate route for that is through developing a constructive dialogue with CDC as those sites are taken forward.

To Promote Local Character and Good Design in Development

42. Creating good places to live, protecting local character and promoting good design is one of the main concerns of planning policy. This is often appropriate territory for a neighbourhood plan because even well-written policies in a local plan may be insufficiently detailed to capture the needs of a particular area.
43. Chichester is typical of cathedral cities. It has a central core of historic buildings and streets which is well covered by policies and statutory protections. Its hinterland of residential and commercial development though less special on a building-by-building basis, nevertheless helps to make the city what it is and is covered in somewhat less detail.

44. If there is evidence that development is taking place which has a harmful effect on individual buildings or on the character of parts of Chichester which make a distinctive contribution to the city as a whole, then putting in place some additional controls could provide the ‘positive purpose’ that a neighbourhood plan needs – a reason why it is worth having one.
45. Previous work on the neighbourhood plan did include an exercise to analyse and assess the important characteristics of individual neighbourhoods using FERIA Urbanism’s PLACE analysis. This is a very useful approach, but the PLACE assessments had incomplete coverage and did not progress to identifying what change might be considered desirable or harmful in the future and how this might be translated into policy. The process could have been successful, but as they stand these assessments are too fragmentary and incomplete to provide much of a guide as to what policies might be needed in a neighbourhood plan (if any at all). It would be easy to assume that in a place like Chichester there must be some, but that is not necessarily correct, and the PLACE assessment work did not reach an advanced enough stage from which to make a judgement.
46. Many neighbourhood plans do have as a key purpose, introducing in the statutory development plan a design statement or design code which sets out in some detail the important characteristics, materials and building typology of areas within the neighbourhood. At least one policy ensures that development proposals must be tested against the content of the design code/guide.
47. A design and character led approach to a neighbourhood plan can be a constructive and positive way forward. The question remains however as to whether there is sufficient need for those additional policies given competing priorities. In my conversations with councillors and officers, there was a strong and commendable message about the importance of local residents having a voice in the planning process. However, there were relatively few examples of important planning decisions or sequences of decisions which highlighted deficiencies in existing policy, or which were allowing harmful change to occur. That may mean that existing policies in the local plan (and eLP) may already be sufficiently detailed and being used effectively to manage the type of development pressure that exists.⁴

⁴ I am very aware that there will always be individual planning decisions with which local residents or ward councillors very much disagree. However, I was not given examples of whole categories of development or areas of the city where there is a sense of existing planning policy failing to keep a grip on change.

To Provide Additional Layers of Protection for Green Spaces, Historic and Community Buildings, Views and Landmarks

48. Neighbourhood plans can play a valuable role in adding a layer of protection to protect particularly important local buildings, open spaces and features of historic importance from inappropriate development. This is frequently valuable in more rural communities where local plan policies are rather general and insufficiently site specific. In these places, there is an opportunity for a neighbourhood plan to make good this deficiency in a constructive way.
49. Although the same issues arise for Chichester itself, the existing range of regulation and planning policy may provide most, if not all, of the necessary protection already. It is highly unlikely that there is a need for additional policies to, for example, protect the cathedral or protect publicly owned green spaces. If a neighbourhood plan were to be prepared then this would certainly be tested, but again in discussions no particular ‘famous cases’ or imminent threats were highlighted which would not be dealt with as well as they could be (given the limitations and uncertainties of the planning system) by way of existing policies.

Sustainability, Biodiversity and Climate Change

50. It is one of the main purposes of the planning system and planning policies to promote sustainable development, limit or mitigate climate change and to protect the environment. The eLP, following the requirements of the NPPF, contains policies to ensure that development in the district meet these objectives.
51. If there is a desire to do so, and specific local justification, a neighbourhood plan can include additional or more granular policies to promote those objectives at a local level. There are limits, imposed by national planning guidance, to the extent that local planning policy can require new development to meet particular criteria, for instance in using local carbon technology. Some issues, such as concerns over the use of land for renewable energy simply do not arise in an almost entirely built-up area.
52. If there are particular policies or objectives that CCC would like to promote these might be suitable for inclusion in a neighbourhood plan, but there will be significant constraints and these must be acknowledged as they are in the eLP.

Work Previously Undertaken

53. A number of pieces of work were commissioned in support of previous work on a neighbourhood plan. These include the PLACE analysis of various neighbourhoods, a community questionnaire and various ‘thought pieces’ on the shaping of particular sites or open spaces. There are also technical studies and reports relating to options for highway and transport associated with the Southern Gateway scheme.
54. Although some of this material is undoubtedly interesting and could inform discussions about the future of Chichester, it is fragmented and does not form anything close to a coherent body of evidence which could support any future neighbourhood plan. Other than the survey carried out in 2019 there is no material which demonstrates public engagement or establishes progress in bringing forward a neighbourhood plan which would satisfy the requirement for community consultation in the relevant regulations, and there are no draft policies or text in any form. The Green Spaces Study completed in 2020 contains useful analysis and information but (perfectly reasonably) it concentrates on management and maintenance issues, rather than planning policy considerations.
55. Changes in work, retail and employment patterns even over the last 5 years, in response to technological change and the impact of the COVID pandemic have been profound. Planning policy has also changed significantly and continues to do so.
56. If CCC were to decide to progress with a neighbourhood plan there would be little or nothing as a legacy of previous work which be of assistance, either in relation to the process of preparing a neighbourhood plan, or as to content or potential policies. It would be starting from scratch.

Conclusions and Recommendations

57. Previous attempts to produce a neighbourhood plan for Chichester foundered for a number of reasons and it is not the purpose of this report to conduct a post-mortem on those attempts. But it is worth reflecting that one of the reasons for that failure was trying to use the neighbourhood plan as a mechanism to promote large scale redesign of the city including major infrastructure works and regeneration projects. The ambition and outcomes they sought might have been laudable, but a neighbourhood plan was never going to be capable of delivering those changes, at least not unless it was the deliberately chosen vehicle agreed between CCC, CDC and the community – which it was not. The legislative and policy framework for neighbourhood plans does not allow them to take charge of such strategic issues. Nor is CDC or West Sussex County Council likely to “allow” a neighbourhood plan to

initiate projects or seek to determine outcomes which they consider to be matters for their leadership. That can lead to a lack of coordination and truly vision led thinking – I do not wish to suggest that this is an ideal situation – but the question is where and how to try to achieve that vision and coordination. A neighbourhood plan could be one of mechanisms for doing so but it is not the primary mechanism.

58. If CCC does decide to recommission work on a neighbourhood plan it should be very clear about the purpose of doing so and make sure that this is clearly articulated through its own decisions and terms of reference for any new neighbourhood plan group.
59. In my view a neighbourhood plan is not the most advantageous way to make the small site allocations in Chichester and has no significant advantages over the alternative that CDC do so via a development plan document. CDC has the resources and expertise to lead on that process, and it should consult and engage with CCC and the community as it does so.
60. A neighbourhood plan cannot take control of or reshape the regeneration strategy for Chichester or make different policies from those in the eLP. Existing regulation and planning policy would appear to give historic assets, open spaces and Chichester's commercial and retail offer sufficient protection (or at least as much as national planning policy allows). Although it is very likely that some additional policies could be identified and would usefully be included, I was not given any examples of this being a priority area or urgent requirement. That is reassuring and I would have been surprised to find that CDC had failed to address these in the eLP or elsewhere.
61. That leaves the territory of character and design as that in which a neighbourhood plan might help to provide better outcomes for Chichester. It would be possible to orientate a neighbourhood plan around the production of a design guide or design code, based on character areas or neighbourhoods. But even here the question is whether there is great enough of a policy gap to justify putting this in place given the work it would entail. Only the council can decide this, but in doing so it should be led by evidence of current outcomes, and future risk. Unless a neighbourhood plan is likely to lead to significantly different results it may not justify the time and effort it takes to complete.
62. It is also important to bear in mind the current uncertainty in the planning system. Although the role and status of neighbourhood plans does not appear to be changing within that system, the scope of what they can say about planning matters, and how they can say it is changing. It may be sensible to allow time for some of this to become clearer before making a decision about whether to proceed.

63. My recommendations are these:

- a. CCC should consider very carefully what, if any, improved planning outcomes can only be achieved by preparing a neighbourhood plan for Chichester. It should only initiate a new neighbourhood plan process if it sure there is a very clear purpose.**
- b. The complex and evolving nature of the planning system, and the government's recently announced devolution/reorganisation agenda has to be a factor in deciding whether and when to start work on a neighbourhood plan. Unless there is some urgent need for a decision (bearing in mind the recommendations below) there is a strong argument for allowing some clarity to emerge about the plan-making timetable in particular.**
- c. A neighbourhood plan does need not be undertaken in order to make the site allocations for Chichester required by the emerging local plan. An allocation process led by CDC would be a better option, in that it would be more efficient for CDC, not create an administrative and potentially challenging burden for CCC and is likely to reach very similar conclusions. That remains true even if it is decided to produce a neighbourhood plan for other reasons – it does not need to make site allocations.**
- d. CCC cannot take control of regeneration projects or major schemes via a neighbourhood plan and should not try to do so. There are other more appropriate routes to take for improving dialogue and building a shared vision between CCC and CDC.**
- e. I was not struck by any immediately obvious issue or area of 'planning failure' which suggested the urgent need for new planning policies to supplement the dense structure of planning policy in Chichester. That does not mean there are no such issues and one way for CCC to determine this would be a more detailed 'gap analysis' to examine the local plan (and other relevant documents) on a policy-by-policy basis to test whether there is anything which could realistically be 'upgraded' only via a neighbourhood plan.**

- f. There is a strong desire to improve community participation and representation in planning processes and decision making. A neighbourhood plan is a mechanism for greater participation and ownership, but that desire alone (without a focus on what it is 'actually going to do') is not enough. In my experience one of the main reasons for slow progress or failure of a neighbourhood plan group is a lack of urgency and momentum.**
- g. If CCC decides that it would like to produce a neighbourhood plan, then it will be starting from scratch. There is little that was produced by the previous neighbourhood plan groups which is sufficiently relevant or up to date to be of use as evidence. On a positive note, the evidence base prepared by CDC for the eLP provides a great deal of up to date and usable base line information.**
- h. If a neighbourhood plan is to be produced it should be seen, amongst other things, as a way of establishing a better relationship with CDC to mutually improve planning policy. It should certainly not be approached on an adversarial basis.**

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