

## **CHUDLEIGH NEIGHBOURHOOD DEVELOPMENT PLAN: APPENDIX TO TABLE OF PRE-SUBMISSION COMMENTS AND RESPONSES**

### **Explanation of Responses to Comments on Policies CHNDP4: Residential Parking and CHNDP7: Shops, Food Outlets and Pubs**

#### **Response 1**

**Relating to Policy CHNDP4: Residential Parking** In a Planning Update: Written Statement by the Secretary of State for Communities and Local Government, made on 25 March 2015, it was stated that:

“The government is keen to ensure that there is adequate parking provision both in new residential developments and around our town centres and high streets.

The imposition of maximum parking standards.....lead to blocked and congested streets and pavement parking. Arbitrarily restricting new off-street parking spaces does not reduce car use, it just leads to parking misery.”

This issue was re-visited in paragraphs 105 and 106 of the 2018 update of the NPPF which state:

“If setting local parking standards for residential and non-residential development, policies should take into account:

- a) the accessibility of the development;
- b) the type, mix and use of development;
- c) the availability of and opportunities for public transport;
- d) local car ownership levels; and
- e) the need to ensure an adequate provision of spaces for charging plug-in and ultra-low emission vehicles.

Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport.....”

Policy CHNDP4 takes account of the NPPF and the supporting text (paragraphs 3.10 to 3.13) clearly explains why, in the local context, a minimum parking standard of 2.5 spaces per dwelling is necessary. Furthermore the provision of spaces for communal and visitor use would enable the installation of publicly accessible charging points as referred to in Policy CHNDP12: Sustainability. There is no justification for setting maximum parking standards: the management of the local road network demands that the opposite approach be taken, as proposed. However, on the advice of Teignbridge District Council, it has been concluded that the policy requires extra wording to ensure that criteria a) to c) are taken into account in decision making. That wording is:

*Proposals which seek to include parking provision below these standards will require robust justification which takes into account the sites accessibility; the type, mix and use of the proposed development and the proximity to, and availability of, public transport.*

An individual or a company wishing to carry out a development should always refer to the Development Plan to establish the planning requirements and take account of those in determining the cost of the development and the value of the land they might wish to purchase. When planning requirements are clearly set out in Development Plan policies, as in this case, developers cannot reasonably argue that they result in unfair costs.

In respect of the comments made on behalf of Cavanna Homes: with careful and imaginative design it should be possible to incorporate adequate car parking without the need to allocate large areas of additional land. However, if additional land is necessary, it is a reasonable price to pay to ensure that new estates are not blighted by excessive amounts of on-street parking and a start is made on providing space for the installation of charging points for electric vehicles. Cavanna Homes' apparent reluctance to accept the proposed policy suggests that the company's priority is profit rather than the creation of an attractive and practical environment.

## **Response 2**

**Relating to Policy CHNDP7: Shops, Food Outlets and Pubs** Chapter 7 of the NPPF deals with the need to ensure the vitality of town centres. Paragraph 85 has two references to housing/residential development. It states:

"Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Planning policies should:

- a) define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters;.....and
- f) recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites."

Chapter 11 of the NPPF, dealing with the effective use of land, makes a further reference to housing in town centres. Paragraph 121 states:

"Local planning authorities should also take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs. In particular, they should support proposals to:

- a) use retail and employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors or sites or the vitality and viability of town centres, and would be compatible with other policies in this Framework;....."

The text supporting Policy CHNDP7 refers to the strong local desire for a wider retail range within Chudleigh and the plans that are aimed at maintaining and improving the vitality of the town centre. There are already more residential than commercial properties in the

centre and consequently, if opportunities for more retail or other non-residential uses are to be maintained, there needs to be a cautious approach to allowing conversions of commercial premises to housing. The policy requires that cautious approach, but does not prevent conversions taking place when it has been shown that an existing business is not viable and the premises cannot be sold at a reasonable price. It is considered that the policy is entirely in line with the intentions of the NPPF in that it will allow conversions where it has been shown that there is no viable alternative and the loss of business premises does not threaten the vitality of the town centre.

Two reports on the current plight of the high streets were commissioned by the Government and published in December 2018:

**The High Street Report** was produced by an expert panel chaired by Sir John Timpson and made three main recommendations:

- establish a High Streets Task Force
- establish a Future High Streets Fund
- undertake local short-term measures to improve the quality of town centres.

The report does not make any specific recommendations in respect of the conversion of business premises into housing. However, in his introduction, Sir John comments that: “We have more shops than we need and are short of housing in many parts of the country. It seems obvious to us that part of the retail estate should be converted into residential property where there is a housing shortage.” There is no shortage of housing in Chudleigh and Sir John’s comments fall far short of a overall conclusion that housing is needed in the high streets.

**High Street 2030: Achieving Change** was produced by the Institute of Place Management based at Manchester Metropolitan University. It consists of a number of case studies from around the country, examining initiatives in a number of town and city centres. While it makes specific reference to housing in some cases, it does not make any general recommendation in respect of conversions or other forms of residential development.