

Worcester Diocesan Board of Finance Ltd

CIL Consultation

We have studied the relevant documents on the SWDP website. It is interesting to note that for many of the developments it is proposed that no CIL levy will be charged. It is evident that the possible infrastructure spend could be as much as fifty times more than the possible funds raised through the levy.

We recognise that some of the funding for community buildings will be included in the Section 106 allocations but we consider there is a discrepancy between the ambitions of the SWDP for funding community buildings including churches whereas the SWIDP has little to say on the matter.

We would urge the SWDP partners to ensure that provision of community buildings will be a priority of the CIL levy.

We draw attention for the need to consider church buildings and halls together, our submission to the SWDP examination hearings (attached) and the welcome amendments then made in the adopted version of the SWDP. It is important that the CIL arrangements are consistent with delivery of the SWDP as a whole.

12th May 2016

End

EXAMINATION OF THE SOUTH WORCESTERSHIRE DEVELOPMENT PLAN

STAGE 2b OF THE EXAMINATION HEARINGS

Matter M: Tourism and Community Uses SWDP 37

WORCESTER DIOCESAN BOARD OF FINANCE LTD

(on behalf of diocesan bodies of Church of England in the Diocese of Worcester)

We particularly address the Inspector's question, "*2) Should policy SWDP 37 give greater guidance on the provision of community facilities and require early consideration of the use of existing buildings, including church property?*"

In summary our response is that within SWDP 37 there should be an obligation at the inception of a project to ascertain whether there is a need for provision of community facilities. If so there should be requirements in SWDP 37 to:

- carry out a sequential test to help assess the best way of providing and sustaining community assets, particularly for new developments.
- establish a timetable and funding with regard to enabling sustainable community development.

On a wider point about the phraseology of SWDP 37 there should be reference to faith buildings being community buildings.

As a note below we include the text of our submission of February 2013. We also draw attention to the following:

- In June 2013 the Worcester Diocesan Synod, being the elected representative body of the Church of England across Worcestershire and Dudley, unanimously approved (inter alia of eight characteristics associated with a vision statement) to being "committed to making our buildings fit for purpose as a spiritual and community resource." Specific encouragement has been given to parochial church councils for buildings being sensitively adapted so that they offer hospitality to all kinds of groups, meetings and activities.
- In terms of the Church of England the additional use of consecrated buildings was enabled by a change in English law by the Pastoral Amendment Measure 2006. This enables church buildings to be used for activities other than worship without need to close the building or declare any part of it redundant. It also provides for the protected occupancy of part of a church building by community groups and non-church organisations under the terms of a lease.

Our submission of February 2013 included (with italicisation added to the three paragraphs with regard to which we consider the Development Plan still has not had adequate regard):

“7. Please give details of why you consider the DPD is unsound. Please be as precise as possible. If you wish to support the soundness of the DPD, please also use this box to set out your comments.

The DPD does not adequately provide for the sustainability of community facilities, especially in new housing areas.

We make this comment from the perspective of the Church of England being present across the county and responsible for several hundred church buildings, church halls and church schools. From a diocesan perspective we are keen to participate in planning for infrastructure and community development. We are interested in ensuring that existing faith and community facilities are widely used by other organisations. We will also continue to contribute to discussions about the provision of faith and community facilities in new housing developments in the county.

8. Please set out what change/s you consider necessary to make the DPD sound, having regard to the test you have identified at 6 above, where this relates to soundness. You will need to say why this change will make the DPD sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In submissions at earlier stages of the plan process we have drawn attention to the need for community facilities to be sustainable, provided early in the development process and substantially funded by the housing developers.

In particular we would wish to see the matters covered in the following three paragraphs resolved as matters of policy in the SWDP (and not left to the individual LEAs and/or individual application processes):

There should be the use of a sequential test to help assess the best way of providing and sustaining community assets, particularly for new developments. We consider that the opportunities of existing community buildings, including church buildings, to be developed for wider community use needs to be an early consideration. Duplication of community buildings should be avoided (as that will damage sustainability of both existing and new facilities) unless their use would be well justified.

It is important to recognise that community infrastructure must be provided at the same time as utility infrastructure. In all new developments, all partners must work together to build communities not just build houses. Planners, other statutory agencies, VCS organisations and residents must cooperate, possibly used a phased approach, to help establish strong, sustainable lively communities with all the facilities they need as homes are built and people move in. Community facilities are needed at the beginning of the development process not after people have moved in.

It is crucial that s106 and Community Infrastructure Levy funds be made available for providing both community infrastructure and for capacity building among local residents and church members.

Our justification has been previously set out, namely:

In the Diocese of Worcester there are over 200 churches, the majority of which are listed buildings. In addition we share responsibility for a large number of church halls and 100 church schools across the

diocese. These buildings serve a range of needs:-

- public worship
- quiet spaces for prayer and reflection
- social gatherings
- educational needs for all ages
- places of historical importance
- ancestral records
- places of pilgrimage
- homes for community facilities

Many of these buildings can be developed for further uses with the right amount of encouragement, support, and resources. The fact that a church building is consecrated does make a difference in that it can affect the mixed use of a church. However recent changes in legislation have made for greater flexibility. We welcome careful consultation about the greater community use of churches by local people.

Other church property includes church halls and church schools. These buildings are often available for use by families and organisations other than church organisations, and we want to encourage further conversations about increased shared use of these buildings.

We are keen to encourage the development of high quality, well equipped and well-maintained community centres. It is important to consider the joint use of such facilities by community groups and churches as this supports community cohesion and can be more cost effective.

We had agreed with the statement in the consultation draft document:- "The three South Worcestershire authorities wish to protect valuable community facilities and services that play an important role in the social infrastructure of South Worcestershire and that help support sustainable communities. In communities where access to alternatives may be very limited, the presence of these facilities may be very important in maintaining a high quality of life." except that we considered, and still do, that the value of these facilities is not so much "important" as vital.

Sir Roy Strong, the art historian and broadcaster, argues that churches should be widely used for a number of purposes. In the Gresham Lecture on 30th May 2007 he said, "Village halls oddly attracted grants on a substantial scale as part of the millennium celebrations. I am one of those who bitterly regret that that was ever done. In times past the church was the village hall and the hall only emerged due to misplaced notions of the use of sacred space in the Victorian era. Churches are truly democratic buildings, the meeting place of ordinary people in times past. Parish churches are buildings for the community and should be used for every kind of activity.""

(end)