



# Representation Form

## Local Plan 2021 – 2039 Publication Stage

Ref:  
  
**(For official use only)**

The consultation on the Local Plan 2021 – 2039: Proposed Submission will run from 3 February 2023 to 17 March 2023. The document and more information on the consultation can be viewed on our website [www.chichester.gov.uk/localplan](http://www.chichester.gov.uk/localplan)

**All comments must be received by 5pm on Friday 17 March 2023.**

There are a number of ways to make your comments:

- Comment on the document on the internet using our online consultation website [www.chichester.gov.uk/localplanconsultation](http://www.chichester.gov.uk/localplanconsultation) **(Recommended)**
- Post a copy of this form to us at: Planning Policy Team, Chichester District Council, East Pallant House, 1 East Pallant, Chichester, West Sussex, PO19 1TY

### How to use this form

Please complete Part A in full. Please note anonymous comments cannot be accepted, a full address including postcode must be provided.

Please complete Part B overleaf, using a new form for each separate policy or paragraph that you wish to comment on. Please identify which paragraph your comment relates to by completing the appropriate box.

For more information, or if you need assistance completing this form, please contact the Planning Policy Team by email at [planningpolicy@chichester.gov.uk](mailto:planningpolicy@chichester.gov.uk) or telephone 01243 785166.

## Part A

### 1. Personal Details\*

*\*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

### 2. Agent's Details (if applicable)

Title	<input type="text" value="Mrs"/>	<input type="text" value="Mr"/>
First Name	<input type="text" value="Jennifer"/>	<input type="text" value="Jeremy"/>
Last Name	<input type="text" value="Asser"/>	<input type="text" value="Farrelly"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Director of Planning"/>
Organisation	<input type="text" value="C/O Agent"/>	<input type="text" value="Genesis Town Planning Ltd"/>
Address Line 1	<input type="text"/>	<input type="text" value="26"/>

Line 2	<input type="text"/>	Chapel Street
Line 3	<input type="text"/>	Chichester
Line 4	<input type="text"/>	West Sussex
Post Code	<input type="text"/>	PO19 1DL
Telephone Number	<input type="text"/>	01243 - 534050
E-mail Address	<input type="text"/>	jeremy@genesistp.co.uk

## Part B

Please use a new form for each representation that you wish to make. Please note anonymous comments cannot be accepted. Any personal information provided will be processed by Chichester District Council in line with the General Data Protection Regulations 2018. More information is available at: <http://www.chichester.gov.uk/dataprotectionandfreedomofinformation>.

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph  Policy  Policies Map

4. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input checked="" type="text" value="x"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input checked="" type="text" value="x"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input checked="" type="text" value="x"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy T1(7.) refers to the delivery of a coordinated package of infrastructure improvements to junctions on the A27 Chichester Bypass; and later on to the Community Infrastructure Levy (CIL) which may be used to contribute towards the costs of improvements to the local transport network.

The explanatory text confirms that the Fishbourne Road and the Bognor Regis Roundabouts on the A27 Chichester Bypass need upgrading and that these works have the greatest priority. Both improvement schemes are recommended to be funded by developer contributions.

The upgrade schemes for these two junctions are included in the adopted Chichester Local Plan: Key Issues 2014-2029 as well as the current Local Plan consultation. It is noted that various upgrades to the A27 Chichester Bypass are being considered for inclusion in the third Road Investment Strategy (RIS3) by National Highways (NH) but NH has yet to confirm when and whether funding will be made available for the A27 improvements. As such, no detailed plans or cost information is available for these schemes at present.

In the meantime the costs of the proposed improvements to the Fishbourne Road and Bognor Road Roundabouts are to be secured from developer contributions. Paragraph 8.21 of the Local Plan Consultation quotes a per dwelling contribution of £7,728 for the southern part of the plan area (excluding the two Strategic Development Locations (SDLs) West of Chichester and at Tangmere). The developer contributions being sought for the improvements to these two roundabout junctions are from residential development and exclude contributions from retail development. This is inconsistent with CDC's adopted CIL charging schedule. No reason or justification for omitting contributions from retail developments has been given.

It is noted that the Chichester Transport Study (2023) comments that the forecast growth is likely to be lower than currently predicted within the transport model, and that the mitigation identified "may not be required in the future". Given this uncertainty, the SATURN modelling outputs cannot be relied upon to determine the

nature of any improvements that may or may not be required at these junctions. As such, the mitigation identified may not actually be required in the future.

In light of the above, the requested per dwelling contribution set out in paragraph 8.21 of the Local Consultation Plan does not meet the tests set out in the CIL regulations and is therefore not consistent with national policy.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or 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.

The requested per dwelling contribution set out in paragraph 8.21 of the Local Plan Consultation needs to be clarified and based on the actual works and detailed costings for these junction improvements which are not known at present. The financial contribution being sought should also be related to the likely impact that a development will have on the junctions. For example developments on the fringes of the southern part of the plan area, such as at Westbourne, are less likely to generate traffic at these junctions and any financial contributions should reflect this.

Confirmation and clarification should also be given to existing housing allocations in made Neighbourhood Plans. These allocations should not be required to pay financial contributions towards the improvement works at these two A27 junctions as they are already planned and are in the system.

(Continue on a separate sheet /expand box if necessary)

**Please note** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing sessions(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To discuss more fully the nature of these representations and any changes of circumstance.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.