

Planning Policy
Chichester District Council
East Pallant House
Chichester
West Sussex
PO19 1TY

Sent by email

A27 CHICHESTER BYPASS MITIGATION SUPPLEMENTARY PLANNING DOCUMENT CONSULTATION

Dear Sir / Madam,

These representations are submitted by Gleeson Land in response to Chichester District Council's (CDC) A27 Chichester Bypass Mitigation SPD Consultation. Gleeson Land has interests in the District. Nonetheless, this response is provided in an objective manner.

The current consultation seeks comments on a new supplementary planning document (SPD) providing detailed advice and guidance on the Council's proposed approach for securing development contributions to mitigate traffic impacts on the A27 Chichester Bypass.

The principle of development funding mitigation required to accommodate planned growth is accepted. However, this should be done in a clear and transparent manner, underpinned by sound technical work. We consider this is not the case here and the SPD fails to provide an appropriate mechanism for contributions to be secured in accordance with the CIL Reg 122 requirements, particularly those of 'relatedness' and 'proportionality'.

This position is supported by a "A27 Contributions SPD Review" (October 2023) prepared by I-Transport (October 2023) submitted alongside this letter. This sets out our concerns with the approach taken by the Council, namely:

- The modelling evidence base, upon which the infrastructure is based, does not make appropriate allowances in travel behaviour, nor does it seek to mitigate impacts through sustainable travel initiatives;
- A 535 dwellings per annum (dpa) 'cap' artificially inflates the contribution per dwelling. The proposed infrastructure is capable of accommodation a greater quantum of development;
- The SPD penalises development coming forward towards the end of the Plan period;
- The relationship between number of bedrooms and trip generation is not linear.

It is therefore our view the adopted approach does not accord with CIL Reg 122 tests used to govern financial contributions. The contributions sought would not be 'directly related to development' nor 'fairly and reasonably related in scale'.

We consider the following changes are necessary prior to the SPD being adopted:

- The artificial 535 dpa cap should be lifted and a greater quantum of development, of at least 700 dpa, be permitted;
- Further modelling of traffic impacts should be undertaken through the Transport Study, allowing for 'Decide and Provide' principles to trip forecasting, a greater emphasis on sustainable travel and for changes in travel behaviour following the pandemic;
- Reconsider the mitigation strategy, to allow for infrastructure only that is necessary to mitigate the impacts of the development, in line with the requirements of CIL Reg 122 and paragraph 57 of the National Planning Policy Framework;
- Consider alternative means of deriving financial contributions that reflect the impact of development, and does not utilise an arbitrary determiner, such as number of bedrooms, that fails to reflect the traffic characteristics of a development; and
- Assess the impact that non-residential development traffic would have on the A27 and ensure other types of development provide proportionate contributions towards any mitigation identified to be necessary.

I trust that the information provided as part of these representations is clear and provides a reasonable way forward to allow the SPD to be adopted. Should you require any further information, please feel free to contact me.

Yours Sincerely,

Peter Rawlinson

Planning Manager
Gleeson Land

Appendix: A27 Contributions SPD Review, prepared by I-Transport (October 2023)