



Representation Form

A27 Chichester Bypass Mitigation Supplementary Planning Document Consultation

Ref:

**(For official
use only)**

The consultation on the draft Supplementary Planning Document (SPD) will run from 22 September 2023 to 3 November 2023. The document and more information on the consultation can be viewed on our website at www.chichester.gov.uk/currentplanningpolicyconsultations

All comments must be received by 5pm on Friday 3 November 2023.

There are a number of ways to submit your comments:

- Online via our consultation portal accessed via our website www.chichester.gov.uk/currentplanningpolicyconsultations **(Recommended)**
- By emailing an electronic version of this form to planningpolicy@chichester.gov.uk
- By posting 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 SPD section 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 or telephone 01243 785166.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

**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.*

Title

First Name

Last Name

Job Title

(where relevant)

Organisation

| | | |
|------------------|------------------|--|
| Address Line 1 | Sentinel House | |
| Line 2 | Harvest Crescent | |
| Line 3 | Fleet | |
| Line 4 | | |
| Post Code | GU51 2UZ | |
| Telephone Number | 01252 360319 | |
| E-mail Address | | |

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>.

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

| | |
|---------------|--------------------------|
| Section Title | The draft SPD as a whole |
|---------------|--------------------------|

4. Please indicate if you wish to:

(a) Support

(b) Object

(c) Comment

Please tick as appropriate

5. Please use this box to provide a short explanation for your response

Please see accompanying letter and transport response note, which together detail our comments and objections to the SPD. In summary our concerns relate to 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'.

Continue on a separate sheet /expand box if necessary

6. Please provide details of any modification(s) you would like the Council to consider. Please be as precise as possible.

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.

Continue on a separate sheet /expand box if necessary