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| CDC b&w LOW res | **Representation Form**  A27 Chichester Bypass Mitigation Supplementary Planning Document Consultation | | | | | | | **Ref:**  **(For official use only)** |
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| 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](http://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](http://www.chichester.gov.uk/currentplanningpolicyconsultations) **(Recommended)** * By emailing an electronic version of this form to [planningpolicy@chichester.gov.uk](mailto: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](mailto: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 | | Mrs | | |  | |  | |
|  | | | | | | |  | |
| First Name | | Tracey | | |  | |  | |
|  | | | | | | |  | |
| Last Name | | Flitcroft | | |  | |  | |
|  | | | | | | |  | |
| Job Title | | Principal Planning Officer | | |  | |  | |
| (where relevant) | | | | | | |  | |
| Organisation | | West Sussex County Council | | |  | |  | |
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| **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>. | | | | | |
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| 3. To which part of the SPD does this representation relate? | | | | | |
|  | | | | | |
| Section  Title | Please see comments below: | | | | |
| 4. Please indicate if you wish to: | | | | | |
| (a) Support  (b) Object | |  |  |  |  |
| (c) Comment | | | | | |
| Please tick as appropriate | | | | | |

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| 5. Please use this box to provide a short explanation for your response |
| WSCC thank you for the opportunity to comment on the SPD, please see the comments outlined below:  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. |
| Please see comments below  Continue on a separate sheet /expand box if necessary |

Thank you for the opportunity to comment on the A27 Chichester Bypass Mitigation Supplementary Planning Document (SPD). Please see below the officer comments from WSCC. The comments highlight key issues and suggest changes to the SPD. We look forward to working with CDC officers in the preparation of this document.

**Paragraph 1.2: Comment**

The technical evidence base assesses the impact of new development on the transport network as a whole, not just on the A27 Chichester Bypass. Also, the mitigation package is likely to include interventions on A27 and local roads.

**Change required:** the SPD introduction section should acknowledge the impact on the transport network rather than focusing solely on the impact on A27.

**Paragraph 2.2: Comment**

National planning and transport policies place emphasis on reducing the need to travel and promoting use of sustainable modes of transport.

**Change required:** It is expected that a sustainable transport package would be provided to serve as part of the package to mitigate the impacts of development on the transport network. Within the City and on other local roads, it is expected that sustainable transport interventions will be prioritised to encourage use of active travel and shared transport and avoid encouraging more traffic into the City. The sustainable transport package should include schemes such as those being developed as part of the West Sussex Transport Plan. In general, these schemes are multi-modal and intended to improve the experience for all users of the transport network. These will help to mitigate the impacts of development from the adopted Local Plan and improve facilities for existing users so will attract funding from other sources.

**Paragraphs 2.13, 3.3, 4.10, 4.24: Comment**

The SPD makes various references to a ‘cap’ on the level of development that can come forward but it is unclear whether this approach is consistent with Paragraph 111 of NPPF as development should only be refused on transport grounds if there would be an unacceptable impact on highway safety or the residual impacts on the road network would be severe.

**Clarification requested:** CDC should consider whether these references should be changed to comply with NPPF Paragraph 111.

**Sections 2 and 4: Comment**

The SPD currently places heavy reliance on highway capacity improvements at the A27 junctions to mitigate the impacts of development. Whilst the County Council acknowledges that improvements are needed to mitigate the impacts of development on the A27, the design of mitigation measures and the location of these measures should be influenced by a range of factors including, for example; the location of development, the effectiveness of measures to minimise traffic growth, and the timing of developer contributions towards mitigation.

**Change required:** We suggest that the SPD should be less specific about the nature and sequencing of the improvements. Instead of that, we suggest that CDC should be invested in a range of schemes, including local road improvements that improve sustainable transport facilities alongside A27 improvements. The rate and sequence by which these are brought forward should be under the overview and recommendation of the Transport and Infrastructure Management Group. That way the envisioned delivery will not only be focussed on highway infrastructure and/or traffic control.

**Section 4: Comment**

Although cost estimates have been produced, it should be acknowledged that these schemes are at an early stage of development and may change in scope as schemes mature in response to further technical work on design and consultation with stakeholders. Therefore, the final cost of schemes is not fixed, as anything produced at this stage is only an outline design stage estimate (from low to highpoint) and general inflation is not the only feasible reason why costs could change over time.

**Change required:** We consider that the SPD should explain this. In particular, schemes requiring major earthworks or potential use of third-party land such as the diversion of Terminus Road from Fishbourne junction to Cathedral Way will require feasibility stage design to increase certainty over delivery cost and land take, which may affect the cost estimate.

Overall, there is a range of transport infrastructure improvements that could be used to mitigate the impacts of development and the County Council considers that a wider range of projects should be taken into account in the calculations for developer contributions. Other than those to be delivered directly by developments, the following multi-modal schemes should be considered when calculating developer contributions due to the role they could provide in mitigating the impacts of development. In general, the County Council aims to secure around 50% of the cost of these schemes from developer contributions with the remainder coming from other sources:

* A285 Chichester – Tangmere Sustainable Transport Corridor – cost £6,600,000
* City Centre to Portfield (via Oving Rd) Sustainable Transport Corridor - cost £3,500,000
* Northgate Gyratory Improvement – cost £7,300,000
* A259 Chichester to Bognor Regis Sustainable Transport Corridor Improvement Scheme - cost £45,103,000 (this scheme would include developer contributions from Arun District, as well as Chichester District)

**Change required:** As the cost of the improvements is likely to exceed what it is viable to secure through the planning system, the County Council requests that references to such potential improvements are referenced generically. This should also help to provide flexibility in how developer contributions are utilised.

**Paragraph 2.12 – change required**

In line with the above, it is best not to fix the implementation of an improvement at the Fishbourne junction as necessarily being ahead of the Bognor Road junction.