



2nd November 2023

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

Dear Sir/Madam,

A27 CHICHESTER BYPASS MITIGATION SUPPLEMENTARY PLANNING DOCUMENT

I am writing on behalf of Hallam Land Management (hereafter 'Hallam') and in response to the consultation on the above draft Supplementary Planning Document (SPD).

Hallam control the land north of Gosden Green and have previously made Representations in response to both the Local Plan Review and the Southbourne Neighbourhood Plan Review. Hallam are promoting this land for new housing, including specialist accommodation, which would be consistent with Southbourne's status as a Settlement Hub as part of the Spatial Strategy in the adopted Local Plan.

A27 JUNCTION IMPROVEMENTS

Hallam recognise the need for A27 mitigation contributions and consider these necessary to ensure there are limited delays to housing delivery in the District.

It is noted at paragraph 4.12 that the number of homes securing the funding will be updated prior to adoption to reflect an accurate estimation. However, this does not set out that the quantum per dwelling will be amended to reflect this potential change. This is critical to ensuring that developments are being required to provide fair and reasonable contributions to the A27 improvements in accordance with the CIL 122 Regulations, rather than a quantum which may change reflecting the number of homes being committed to in the emerging Local Plan.

The SPD does not include allowance for the changes in travel behaviour nor does it seek to mitigate highways impacts through sustainable travel initiatives. Without consideration of these the SPD may not represent a cost-effective means of mitigating impacts of development on the highway network.

It is recommended that the SPD is amended to set out how the contribution sought per dwelling will be updated to reflect any change in the supply of housing, the consideration towards travel behaviour and alternative mitigation measures using travel initiatives. There should be a monitoring mechanism embedded into the SPD to ensure that there is a review of committed housing delivering and travel behaviour in relation to the contributions sought.

Similarly, the SPD does not include allowance for any potential grant funding for improvements to the A27, which has previously been identified as a priority location in the Road Investment Strategy. There is a risk that should grant funding be made for these improvements the contributions sought through this SPD will be too high, risking the viability and delivery of housing schemes across the District.

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The SPD sets out that all new housing developments, unless exempt, will be required to provide this contribution. However, it is concerning that other development such as employment uses are not required to pay these monies. These other developments would still use the A27 and should be required to provide this contribution. Again, this would reduce the cost to developers and distribute the payments towards infrastructure improvements across a wider range and number of development schemes.

HOUSING NEED IN CHICHESTER

Hallam have previously made Representations to the Local Plan Review, including to challenge the number of homes the District are identifying as the need in the emerging Local Plan.

Draft Policy H1 identifies the need for the Plan to make provision for at least 10,350 dwellings within the Plan Period, amounting to 575dpa. With the majority of these to be delivered along the east-west corridor, consistent with the Spatial Strategy.

This is lower than both a. the standard method figure of 638 dpa; and, b. the Preferred Approach figure in the previous consultation, of 650 dpa which included accommodating some unmet need arising from the South Downs National Park area. This shortfall will amount to over 1,100 dwellings across the plan period, all of which would have provided A27 mitigation contributions.

It is highly germane that the current Local Plan also adopted a lower housing figure than the identified need of 505dpa, proposing instead to deliver 435dpa.

By consistently limiting the amount of housing there will be fewer developments contributing to infrastructure improvements, including the A27 works identified in this draft SPD. This creates two issues: firstly, there is a greater financial burden placed on a lesser amount of developments, compared to meeting the requirement in full; and secondly, with fewer schemes being delivered there is a higher risk that there is a severe delay in these infrastructure improvements being delivered, which again could delay housing delivery in the District.

Paragraph 4.26 of the consultation document sets out how the uncertainty of the precise housing mix that will come forward will require the Council to monitor the level of funding being secure and potentially require a review of the SPD. This again questions why a lower number of homes are being proposed when this raises uncertainty on infrastructure schemes coming forward.

Hallam consider that the proposal to reduce the overall housing supply for the plan period is not supported and that the evidence base should reconsider the delivery of the housing requirement in full. Without the identified housing requirement being met in full the problem of the younger population being unable to afford to remain in Chichester will continue, further growing the gap in workforce and an increasingly aging population.

Therefore, this SPD should consider the housing need in full and not a reduced quantum. This would see lower contribution figures and would support earlier delivery of A27 junction improvements. Through a reduction in the contribution number there would be a lesser risk to development viability of schemes and paragraphs 5.13 to 5.20 of the consultation document would be less likely to apply. Should these continue to apply there is a risk that elements of other contributions such as affordable housing could be underdelivered.

Specialist accommodation need

The consultation document sets out at paragraph 4.28 that there are some cases where the A27 mitigation contribution would not be sought. This includes some types of care homes and extra care facilities, unless they provide private parking for residents beyond that of a normal visitor space rate.

The provision of this type of development has lesser of an impact on the local highway network, and therefore Hallam support this reduced requirement for the contribution. However, it is vital that the need to upgrade these junctions does not delay development, including the identified need for specialist accommodation. Therefore, through seeking reduced contributions from the construction of these developments, it assists with providing the required A27 improvements but does not prevent the short term delivery of this type of accommodation.

CONCLUSION

The Council need to continue delivering housing in the short term whilst addressing these infrastructure constraints, and the land under Hallam's control is a suitable site to enable this.

Hallam disagree with the District lowering the housing supply target for the emerging Local Plan. This figure should be the identified housing requirement. With a higher figure the cost on developments would be lower, and the risk of viability consequences and potential delays to the infrastructure improvements would be reduced.

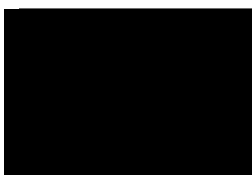
Similarly, the SPD should consider changes to travel behaviour and the introduction of travel initiatives as differing mitigation measures.

The SPD does not include potential grant funding and the alteration this may have to the contribution sought from developments. These should be reviewed prior to adopting this SPD.

Finally, the SPD should be seeking contributions from other types of development which will be using the A27 and not focusing only on residential development.

Hallam recognise the requirement for the financial contributions as part of this draft SPD; however, the Council need to ensure that whilst the contributions are being received, development is still able to be delivered to address the identified housing and specialist accommodation needs.

Kind regards



Kate Coventry
Senior Planner