



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*

**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

mr

mr

First Name

Timothy

Nick

Last Name

Aldridge

Reynolds

Job Title

Chair

(where relevant)

Organisation	Lavant Parish Council	
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Line 2	East Lavant	East Lavant
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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>.

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

Section Title

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

The proposed Draft SPD re *A27 Chichester Bypass Mitigation A27* relates to the presumption of future housing developments, their impact on the A27 and related developer contributions to pay for any (unspecified) mitigation measures as a consequence of those developments.

Is the intention of CDC to allocate 100% of Developer contributions for the partial upgrade of some A27 junctions impacted by those developments? How does this ensure that developers pay for a fairer share of affordable housing and other local infrastructure as the Government announced on 17march 2023?

Setting to one side CDC's (and WSCC) sorrowful track record of rejecting Central Government's inward investment despite WSCC's announcement on 25Jun2015 ("£350m investment welcomed by WSCC" that ... "confirmed the existing commitment to upgrade the four junctions on the Chichester Bypass") it was clear that the junction capacity and highway safety issues were known when the funding was on offer from Highways England. Since that time it has become clear that CDC need additional funding to deliver mitigations necessary for the development of a sound Local Plan.

So why in ?2017 did CDC/WSCC inexplicably request the A286 South of Chichester to be removed from available funding from the Major Road Network MRN? Indeed there is no convincing evidence within this SPD which confirms that the Department for Transport has been requested by CDC/WSCC for the A286 South of Chichester be once again included in the MRN funding scheme. By so doing WSCC would play their part in assisting CDC in delivering a robust Local Plan for the benefit of the whole Chichester Community.

Without any evidence of seeking and securing alternative funding sources the Chichester community are now being asked to accept that additional funding for infrastructure upgrade is to be funded by future housing developments but only in respect of the impact of those developments. The impact of course will simply add to the infrastructure deficit that has now reached its nadir in the Chichester area. There needs to be a clear correlation between the capacity of the landscape to absorb new housing numbers, certainty from National Highways, MRN and others in relation to funding improvements to alleviate the current congestion and certainty from Southern Water as to when their improvements are to be completed to the sewerage infrastructure.

We object to the proposed draft SPD because the infrastructure remains deficient to support more housing and secondly CDC would forever be indebted to the commercial vagaries of developers set against a moving target of viability tests with new more affordable housing models. It is entirely dependent on the granting of planning approvals and potential developer funding.

This is not a sustainable solution and the draft mitigation SPD should therefore be dismissed.

OTHER RELATED MATTERS

1. Ministerial comments from the Secretary of State for Levelling-up, Housing and Communities. (Housing Today 27 June 2023) and the letter sent to MPs state that the Levelling-up and Regeneration Bill would be amended to **abolish local mandatory house building targets** as "there is no truly objective way of calculating how many new homes are needed in an area".
2. This change makes the centrally determined target a "starting point", with **councils able to propose building fewer homes if they faced "genuine constraints" or would have to build at a density that would "significantly change the character of their area"**.
3. The Secretary of State has also been quoted as saying that the planning system is "not working as it should" and that **new development must have "the support of the local communities" and added that it must be accompanied by the right infrastructure.**
4. Constraints to more housing development are manifest and include the **erosion of the character of our erstwhile rural Sussex** and losing some of the most productive and versatile land for agriculture.
5. Some development allocations in the draft Local Plan do not meet the criterion of being remotely acceptable to the local population who despair regarding infrastructure deficit whilst housing proliferates. Further depletion of our green fields coupled with new housing adding to the already outdated and failing sewage system detract from the area as a tourist destination and the discharges of raw sewage into our rivers and sea are hitting the local economy..
6. **The draft SPD provides no funding for upgrading the A27 junctions to alleviate the current congestion.** Such future developments as proposed should therefore be disallowed until such time as the A27 upgrade has been implemented to cater for the existing traffic issues.
7. **There is a lack of certainty that the developer contributions sums will not be adjusted downwards** as the result of developers contesting the viability studies. At the very least the quantum of affordable houses are likely to be reduced.
8. With the uncertain UK economic environment due in part only to climate change which will affect what and where we build **there is no guarantee that this proposal will be realised as envisaged.** The proposed SPD is not therefore a sound basis for the upgrading of the infrastructure to meet any agreed future housing needs.
9. **Local residents in general feel there needs to be a moratorium on large scale development that do not address local housing needs until the sewage and roads issues are resolved.** In terms of future housing, we need to prioritise social housing and low-cost starter homes as these are needed by local people in a low wage economy. It would help greatly to have a housing target that is both realistic and recognises local need.

1.7 The logical approach to mitigation of the traffic congestion at the SRN Chichester A27 junctions is firstly for National Highways and others to fund and to carry out such work to normalise the current congestion. In addition for CDC with WSCC to source additional funding other than the SRN/ MRN. A "cocktail of funding sources" was promised by WSCC). Developer contributions would then be available for other mitigation issues where developments impact on existing infrastructure.

This "new approach to A27 mitigation" means CDC propose to fund the mitigation of the impact of future development whilst leaving the current congestion untouched. This 'kicking the can down the road' is not a solution and neither is granting further permissions for housing without dealing with the current infrastructure deficit.

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.

All of the above as an integrated approach properly funded and in the correct sequence.

Continue on a separate sheet /expand box if necessary

Part B

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<http://www.chichester.gov.uk/dataprotectionandfreedomofinformation>.

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

Section
Title

2.00 BACKGROUND

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

2.6 The improvement works to the Fishbourne, Bognor, Stockbridge and Whyke junctions were all included in the HE funding offer rejected by CDC and WSCC in 2018. Thus there was not an “absence of Government funding” (ref4,1)

It would never (despite inflation and cost escalation) have been affordable from developer contributions.

2.7 It is an egregious error to claim that no funding was available from central government over the past decade. The absence of Government funding was due to the decision by CDC and WSCC not to accept what was on offer.

Have CDC/WSCC followed funding from the MRN programme. It is understood that this was also turned down by WSCC in 2018. Can it be rejuvenated for the A286 south of Chichester? Is the Bognor road junction a candidate?

2.15 The viability was presumably based on the historical housing models so favoured by developers to maximise their profits. In future the housing models need to change because affordability will become a major criterion for purchasers. This will lead to different types of housing that are affordable and therefore challenge the historical viability studies.

Continue on a separate sheet /expand box if necessary

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

Section
Title

4.00 PLANNING CONTRIBUTIONS

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

4.1 There is little evidence to provide confidence that funding sources from Government and others have been robustly pursued.
Have CDC/WSCC fully explored funding via the MRN (funding stream remote from RIS) which they had previously rejected despite being available for the A286?

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.

Continue on a separate sheet /expand box if necessary