



## 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](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\*

*\*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)

#### 2. Agent's Details (if applicable)

Organisation	Wates Developments	
Address Line 1	Wates House	
Line 2	Station Approach	
Line 3	Leatherhead	
Line 4		
Post Code	KT22 7SW	
Telephone Number	██████████	
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

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

We have serious concerns that the proposed approach the Council are seeking to pursue through this SPD does not accord with the legislative framework as detailed within the 2004 Planning and Compulsory Purchase Act (as amended). Our concerns are expanded on in detail within the appended Opinion (**Appendix 1**), prepared by Matthew Henderson of Landmark Chambers.

In simple terms, we do not believe the Council can pursue the approach advocated in the SPD, which is to collect financial contributions for growth anticipated in an emerging (and unadopted) Local Plan.

We have concerns with respect to the levels of contributions being sought and the adverse impact on development viability which would flow from this. The current emerging Local Plan 'cap' of 535 dwellings per annum is not supported by the Council's own evidence base, namely the Local Plan Review Transport Assessment (LPRTA).

Furthermore, it is not rational to pursue a tariff based on a "per bedroom" basis where larger properties would be occupied by children who do not drive a vehicle. These matters are expanded upon further in the appended note, prepared by i-Transport (**Appendix 2**)

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.

The adoption of this SPD should not be taken forward because the Council's suggested approach is not in compliance with the legislative framework or the NPPF. A27 mitigation is a matter that needs to be tested through a formal Examination in Public, associated with the emerging Local Plan.

The LPTRA shows that a 700 dwellings per annum, or more, could be delivered through the emerging Local Plan. The forthcoming Examination in Public of the emerging Local Plan could therefore result in a higher level of housing delivery which, if the Council's approach to A27 mitigation is found to be acceptable, would bring costs down on a 'per dwelling' basis.

All of these issues point towards the necessity of addressing this matter through the Local Plan process, rather than trying to avoid the necessary scrutiny through the 'lighter touch' SPD consultation/adoption process.

Continue on a separate sheet /expand box if necessary