



Planning Policy Team  
Chichester District Council  
East Pallant House  
Chichester  
West Sussex  
PO19 1TY

recycling and recovery UK

Sent by Email to [planningpolicy@chichester.gov.uk](mailto:planningpolicy@chichester.gov.uk)

3<sup>RD</sup> NOVEMBER 2023

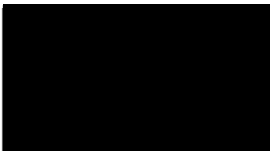
To whom it may concern,

**Consultation – A27 Chichester Bypass Mitigation SPD**

Thank you for the opportunity to respond to your consultation on the above draft SPD. A response form has been completed and is provided at Appendix A.

I trust this provides sufficient information to determine the application. Please do not hesitate to contact me should you have any queries.

Kind regards,



Emma Smyth  
Senior Planning Manager





## APPENDIX A Representation Form

Ref:

(For official  
use only)

### A27 Chichester Bypass Mitigation Supplementary Planning Document Consultation

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	Suez Recycling and Recovery UK	
Address Line 1	Amenity Way	
Line 2	Morden	
Line 3	London	
Line 4		
Post Code	SM4 4AX	
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

**Viability Testing: Paragraphs 4.16 to 4.26**

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

Paragraph 2.15 of the draft SPD identifies that CDC have tested various levels of contribution ranging from £3,000 to £8,000 per dwelling and the outcome of that testing was that the majority of development scenarios were found to provide the required level of funding. The draft SPD then proceeds to explain at paragraph 4.16 that, factoring in the proposed number of dwelling to come forwards under the emerging Local Plan, this would equate to £7,623 per dwelling. However, it is noted in paragraph 4.18 that this level of contribution was not viable for scenarios comprising solely of flats on brownfield sites, nor for 'Extra Care' schemes nor older persons sheltered housing. The details of the viability testing have not been provided for review and SUEZ believe it is critical that the viability testing methodology and outcomes are made available for review.

Paragraph 4.19 then proceeds to present the case for applying a sliding scale of contributions based on the number of bedrooms. It is stated that, "*Smaller dwellings generally have fewer occupants who drive and own a car and therefore have a generally smaller impact than is the case with larger dwellings where the larger number of occupants would, on average, own and drive more cars.*" SUEZ fundamentally disagrees with this statement; there is no evidence presented with the draft SPD to support this assertion and SUEZ requests that the Council's evidence to support this statement is made available for scrutiny. This assertion doesn't acknowledge that larger homes accommodate families with children occupying separate bedrooms; Section 325 of the Housing Act 1985 (the 'room standard') states that a household may be statutorily overcrowded where children of the opposite sex over the age of 10 have to share a room. Larger homes are therefore required for larger families to prevent overcrowding.

The evidence that larger homes equates to greater car ownership is not presented and it is SUEZ's view that without supporting evidence, the proposed sliding scale of contributions presented in paragraph 4.23 is not justified.

In addition, no viability testing has been carried out for contributions above £8,000 per dwelling (paragraph 2.15 expressly states that viability testing was carried out to a maximum of £8,000 per dwelling).

In summary, SUEZ objects to the concept of a bedroom-based contribution scale and we object to the contribution figures presented in paragraph 4.23 because:

- Figures above £8000 have not been reviewed through CDC's viability testing.
- No Viability Testing methodology or outcomes are presented for review.
- No justification is provided to support CDC's assertion that larger homes result in a greater vehicle ownership.

Finally, it a bedroom-based sliding scale of contributions provides uncertainty for land owners and for developers which may hinder the development of future housing.

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.

SUEZ suggest that further information should be made available during a further round of consultation; specifically to include details of CDC's Viability Testing methodology and justification for proposed contributions.

Continue on a separate sheet /expand box if necessary

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

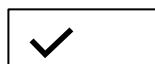
Section  
Title

Paragraph 1.1

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

Paragraph 1.1 provides the reasoning that the 2016 Planning Obligations & Affordable Housing SPD is being updated due to emerging evidence associated with the preparation of the emerging Chichester Local Plan 2021-2039.

CDC's current Planning Obligations & Affordable Housing Supplementary Planning Document (SPD) was adopted in 2016; notably after the Examination and Adoption of CDC's current Local Plan (adopted in July 2015). CDC's proposal to amend this SPD based on emerging technical evidence prepared for the Chichester Local Plan 2021-2039 appears to be premature; the evidence has not yet had the opportunity to be reviewed through the Plan Examination process.

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.

SUEZ suggest that CDC awaits the completion of the Examination in Public for the Chichester Local Plan 2021-2039 before adopting a new level of contributions.

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

Paragraph 2.13 and 4.9

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

Paragraphs 2.13 and 4.9 both reference a limit of 9,630 dwellings. It is SUEZ's view this should be amended to read, "...*approximately* 9,630 dwellings."

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.

As above.

Continue on a separate sheet /expand box if necessary