Planning Policy,

Chichester District Council

East Pallant House

Chichester

West Sussex

PO19 1TY

**A27 CONTRIBUTIONS SUPPLEMENTARY PLANNING DOCUMENT CONSULTATION**

Dear Planning Policy,

These representations are submitted by Gleeson Land in response to Chichester District Council’s (CDC) A27 Chichester Bypass Mitigation SPD Consultation. Gleeson Land has interests in the District. Nonetheless, this response is provided in an objective manner.

As set out in Gleeson’s previous response to the SPD consultation in 2023 the principle of development funding mitigation required to accommodate planned growth is accepted. However, whilst it is appreciated that further technical work has been undertaken there are still several fundamental questions. The following concerns raised in our previous response remain:

* The modelling evidence base, upon which the infrastructure is based, does not make appropriate allowances in travel behaviour, nor does it seek to mitigate impacts through sustainable travel initiatives;
* The impact of all non-residential travel has not been addressed.
* The emerging Local Plan has not been adopted and it is unknown whether the submitted Plan is ‘sound’. Gleeson considers that the housing target should be increased and a 535 dwellings per annum (dpa) ‘cap’ would artificially inflate the contribution per dwelling. The proposed infrastructure is capable of accommodating a greater quantum of development;

The document attached to this cover letter titled “A27 Contributions Supplementary Planning Document Consultation – 2024” (26th June 2024) prepared by I-Transport, sets out our further response and unanswered questions to the A27 Contributions SPD consultation; namely:

* The contributions on windfall development will only make a minor contribution towards the now much larger funding gap to provide the A27 upgrades and the SPD makes it clear that no other funding sources of funding have been made available to address the remaining 85%-92% shortfall. Without this detail it is uncertain which of the required upgrades are deliverable and what the implications are if the funding shortfall is not resolved. The SPD needs to provide clarity as to how the remainder of the shortfall is to be funded.
* The Council has failed to secure sufficient funding from approved development to deliver the A27 improvements, so there would be a disproportionate burden placed on future development which may not have a severe impact on the network. This raises the question whether the proposed approach complies with CIL Reg 122 tests of both proportionality and relatedness.
* The A27 mitigation package is based on 10 year old evidence prepared for the current Local Plan which was adopted in 2016. Travel patterns have likely changed in the interim and the mitigation requirements should be reviewed to ensure they are up to date and fit for purpose.
* There are no transition arrangements in place to secure contributions from development between when the emerging Local Plan is adopted and a new charging mechanism is in place. There is also no process identified for the SPD to be reviewed if the Local Plan is not adopted as the Council expects.

The following is therefore considered necessary prior to the SPD being adopted:

* The emerging Local Plan housing target should be increased and the artificial 535 dpa cap should be lifted to at least 700 dpa to ensure the contributions are more fairly distributed and new development is not over compensating for any traffic impacts that may arise;
* Further modelling of traffic impacts should be undertaken to confirm, or otherwise, that the package of A27 mitigation measures is still necessary;
* If the mitigation measures are still necessary clarity needs to be provided as to how the remainder of the funding shortfall will be secured. The Council should set out a business case for securing the additional funding.
* The impact of non-residential development traffic such as commercial or industrial traffic on the A27 should be reviewed to ensure other types of development provide proportionate contributions towards any mitigation identified to be necessary.
* A review mechanism needs to be included in the SPD in the event that the emerging Local Plan is not adopted as the Council expects.

I trust that the information provided as part of these representations is clear and provides a reasonable way forward to allow the SPD to be adopted.

Yours Sincerely,

Peter Rawlinson

Planning Manager

Gleeson Land

Appendix: A27 Contributions Supplementary Planning Document Consultation - 2024, prepared by I-Transport (June 2024)