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Our ref; NR-A27SPD-090724-MTP

9th July 2024

BY EMAIL ONLY

Dear Sir/Madam,

Representation on A27 Chichester Bypass Mitigation Supplementary Planning Document Consultation

Mission Town Planning Ltd, have been engaged by our client to make representation to the emerging Chichester District Council Local Plan consultation closing on 11th July 2024

We have been commissioned to make representations on the plan so far as it impacts sites that are of interest to my client, specifically with Hunston, and the site to the south of the village known as Land At Farmfield Nurseries, Selsey Road. The site was provisionally proposed for allocation both within the Neighbourhood Plan, and also the Council's regulation 18 plan

Representations

These Representations are focused solely on matters of direct relevance to my client's land interest within Chichester District Council's authority.

The primary and fundamental issue with the consultation would appear to be that the mechanism that the Authority are pursuing is contrary to the Planning Policy Guidance ref; Paragraph: 004 Reference ID: 23b-004-20190901 this states that;

“ It is not appropriate for plan-makers to set out new formulaic approaches to planning obligations in supplementary planning documents or supporting evidence base documents, as these would not be subject to examination. Whilst standardised or formulaic evidence may have informed the identification of needs and costs and the setting of plan policies, the decision maker must still ensure that each planning obligation sought meets the statutory tests set out in regulation 122. This means that if a formulaic approach to developer contributions is adopted, the levy can be used to address the cumulative impact of infrastructure in an area, while planning obligations will be appropriate for funding a project that is directly related to that specific development.”

From this statement from the PPG alone it would appear that the policy basis for this SPD is flawed. The appropriate time would have been to work this through with the regulation 19 submission. While the consultation document seeks to address this in section 2, and para 3.5 and 3.6, there is simply not any adequate justification for this approach. The assumption that CIL should not be amended and that the emerging Local Plan will be adopted imminently are simply not plausible. Moreover, there is very little considered to any alternative solutions, such as reduced parking, increases in public transport, or other methods which would reduce the reliance on private motor vehicles. This approach could be District wise and would be a far more consider and sustainable approach.

In terms of the SPD itself, we do not believe that the scheme would address the cumulative impact all of the contributions and requirements, such as Bio-diversity net gain, which at the time of publication was an unknown, site specific Section 106 contributions, Community Infrastructure Levy, abnormal site costs etc. The Local Plan 2021-2039 Viability Assessment – Stage 2 January 2023 DSP21755, is already some 18 months old and would not be able to consider the increases in material costs, interest rate rises, and intransigence in the housing market. Furthermore, the report itself repeatedly states that viability will be marginal.

The ability to adopt this provision critically relies on the affordable housing provision being as set out in the emerging policy H4, of between 20 and 30%, whereas the current adopted Policy 34 sets a borough wide target of 30% across the borough. Given the nature of the proposed SPD being related solely to the south, the delivery of affordable housing will clearly suffer. As this has not been properly factored into the considerations.

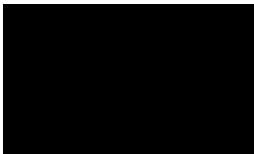
Summary

I trust that these Representations are of assistance in considering the current drafting and SPD and that consideration is given to the appropriateness of adoption of this.

My client would request that we continue to be engaged in the plan making process and we look forward to hearing from you with regard to the next steps.

If you require any further information in support of these representations, please do not hesitate to contact me.

Yours sincerely,



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