

Chichester District Council

Draft Housing Delivery Statement



February 2026

1 Background and Purpose of the Document

- 1.0 Chichester District Council adopted the Chichester Local Plan 2021 – 2039 ('the Local Plan') in August 2025. Work is also underway on a Southbourne Allocation DPD, in order to identify a site allocation within the Southbourne Broad Location for Development (BLD) (Policy A13).
- 1.1 The Local Plan provides for housing needs in accordance with National Planning Policy Framework (NPPF) paragraph 11 and ensured that the council had sufficient deliverable sites to provide for a minimum of five years' worth of housing, in accordance with paragraph 72 of the NPPF, on adoption of the Plan.
- 1.2 However, an additional paragraph (78c) was added to the NPPF in December 2024 which increased the size of the buffer required when calculating the supply of deliverable sites. This means that the buffer to be used (from the 1 July 2026) is 20% rather than 5%. This increased buffer is being applied because the Local Plan has a housing requirement examined against a previous version of the NPPF and the average annual housing requirement is 80% or less than the most up to date local housing need figure. This change in national policy is aimed at increasing the supply of housing and has been imposed on authorities who were allowed to proceed with their Local Plan examination under a pre-December 2024 NPPF, which included a lower housing figure than the new standard method calculation.
- 1.3 The new 20% buffer means that additional deliverable sites are needed to boost the council's supply position, as the amount of planned supply in the Local Plan will leave us short of deliverable sites which can be included. It is important to note that some of this additional supply will 'bring forward' housing which was in the trajectory for later in the Local Plan period due the need to allocate sites through subsequent plan documents.
- 1.4 This Housing Delivery Statement (HDS) does not set out new policy or replace the development plan for decision making. It is in response to the higher buffer and sets out how the council is taking a positive and proactive approach in seeking to boost its supply of housing in a way which provides clarity and confidence in relation to how planning applications should be determined both prior to and after 1 July 2026. It does not seek to alter the statutory or non-statutory planning policy framework for decision-making.
- 1.5 The acceptability of planning proposals will still need to be assessed by the decision-maker on a case by case basis, in relation to the economic, social and environmental dimensions of sustainable development, leading to a conclusion about the overall sustainability of the proposals, whilst having regard to all elements of the proposal, up-to-date development plan policies including those within made neighbourhood plans, the National Planning Policy Framework (NPPF), and other material considerations. This HDS will seek to secure additional opportunities for housing development in locations which are sustainable, where it can be demonstrated that there would be early

delivery of new homes and effective pre-application community engagement has been carried out.

- 1.6 This Statement applies to greenfield and brownfield housing sites (of 5 or more dwellings) outside of settlement policy boundaries and does not apply to existing housing allocations within the Chichester Local Plan area, sites within the settlement policy boundaries or to land within the South Downs National Park.

2 Approach to boosting housing supply

- 2.1 In order to achieve a five-year housing land supply when the buffer is increased to 20% the council will need to boost its housing supply and work proactively now. This means taking a positive stance now to aim to achieve and then maintain a robust five-year supply after the 1 July 2026.
- 2.2 The council must continue to judge planning applications on their own individual merits with reference to the adopted development plan and national planning policy including the NPPF.
- 2.3 If at any point after the 1 July 2026 the council has established a robust five-year supply position, then the need for this Housing Delivery Statement will be reviewed. The intention is for the council to be able to guide housing development which comes forward outside the settlement policy boundaries to appropriate and sustainable locations by using this document to assist in the consideration of planning applications. It will help to ensure that these housing proposals are assessed in a consistent manner.
- 2.4 The council intends for this Housing Delivery Statement to form one part of the council's proactive approach to the delivery of housing in response to the increased buffer requirement. Other approaches being taken to boost housing supply and delivery will be considered as part of a Housing Delivery Action Plan which is being prepared.
- 2.5 By preparing this Statement and the Action Plan, the council intends to demonstrate how it is taking a proactive approach to reducing any shortfall post 1 July 2026 and, should it fall below five years on 1 July 2026, to re-establishing a five-year supply. This will allow longer term protection if and/or when a 5-year supply is re-established.

3 Planning Policy Context

- 3.1 The National Planning Policy Framework (NPPF) (December 2024) is a material consideration in planning decisions. At the heart of the NPPF is a presumption in favour of sustainable development. For decision-taking (paragraph 11) this means:
 - Approving development proposals that accord with an up-to-date development plan without delay; or

- Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
 - The application of policies in the Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or
 - Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.
- 3.2 Consideration should be given to footnotes 7 (which lists protected areas/assets of importance), 8 (when policies will be out of date) and 9 (key policies for directing development) of the NPPF, as well as other relevant paragraphs of the NPPF.
- 3.3 Footnote 8 sets out when relevant policies will be out-of-date and sets out that this includes where the local planning authority cannot demonstrate a five-year supply of deliverable sites (with the appropriate buffer as set out in paragraph 78); or where the Housing Delivery Test indicated that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years.
- 3.4 The key paragraphs referenced in footnote 9 are:
 - chapter 5, paragraphs 66 (right mix of affordable homes) and 84 (avoiding isolated homes in the countryside)
 - chapter 7 paragraph 91 (sequential test for town centre uses)
 - chapter 9 paragraphs 110 (sustainable transport and 115 (transport modes, access, design and impacts)
 - chapter 11 paragraph 129 (efficient use of land) and
 - chapter 12 paragraph 135 and 139 (high quality design).
- 3.5 The council will have regard to any new national policy that may be implemented throughout the lifetime of this Statement and reserves the right where appropriate to amend this Statement to bring it into accordance with any new national policy.

4 Local context

Housing supply in the Local Plan

- 4.1 The housing requirement for the plan area is to provide for at least 11,484 dwellings (638 dwellings per annum/dpa) to be delivered over the period 2021/22 - 2038/39 and stepped at 575dpa for the years 2021/22 to 2029/30 and 701 dpa for the years 2030/31 to 2038/39 (Policy H1). In order to reach the

housing requirement, the Plan includes 598 dwellings which have yet to be allocated. This is in addition to any sites which are still to be allocated in accordance with Policies H2 (Strategic Locations/ Allocations) and H3 (Non-Strategic Parish Housing Requirements).

- 4.2 It is important to emphasise that any unplanned housing developments over 5 dwellings within the parishes with a requirement in Policies H3, A2 and A15 will continue to be deducted from the parish or policy requirement number. This means that until any residual number is exceeded, housing development on unallocated site/s outside the settlement policy boundary would not be in addition to the number of dwellings already set out for those parishes within the Local Plan.
- 4.3 The sites that have yet to be allocated are shown in the Local Plan housing trajectory as delivering in the latter end of the plan period. Any unplanned sites that come forward in accordance with this HDS would therefore not be in addition to the overall number of dwellings within Policy H1 supply (until exceeded) but would be coming forward earlier in the plan period or would be contributing to windfall allowances.

5. Housing Delivery Principles

How they will be used

- 5.1 Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. In this context, the Development Plan comprises the adopted Chichester Local Plan 2021 - 2039, the Site Allocation Development Plan Document 2014 – 2029 and the ‘made’ Neighbourhood Plans for parishes in the Local Plan area. The emerging Southbourne Allocation DPD reached Regulation 18 stage in October 2024 and will be given weight in accordance with the stage it has reached when any relevant application is being considered for determination. Appropriate weight will also be given to emerging neighbourhood plans.
- 5.2 Should the council’s five-year supply position fall below what is required once the 20% buffer is applied in July 2026, the ‘tilted balance’ will apply as the ‘policies which are most important for determining applications will be out-of-date’¹, however the Local Plan will remain part of the statutory development plan and will continue to provide the basis for the consideration of planning applications for development within the Plan area.
- 5.3 The council acknowledges the presumption in favour of sustainable development set out in the NPPF and the engagement of the ‘tilted balance’ which applies when a five-year housing land supply cannot be demonstrated resulting in the most important policies being considered out of date. In such circumstances, the council will proactively support planning applications that deliver high-quality, well-designed housing of an appropriate scale in

¹ NPPF para. 11(d)

sustainable and accessible locations, consistent with national and local policy objectives. There will be an expectation that sites make the most efficient use of land by maximising densities through the use of innovative design approaches and site-specific solutions whilst achieving high-quality place-making.

- 5.4 As the Local Plan has been recently adopted, the other policies within the Plan should continue to be given full weight in decision making. As such, it is not considered necessary to repeat or cross refer to them in the HDS.

Principle 1: Sustainably located

Housing development should be directed to sites close to the sub-regional centre, settlement hubs, and service villages.

The Local Plan settlement hierarchy (Policy S2) has been defined in relation to the presence of certain services and facilities and considered the provision of convenience stores, primary schools, village halls, play areas, medical facilities and public transport. The sub-regional centre (Chichester city), settlement hubs and service villages listed in Policy S2 provide access to services and facilities and are accessible by a choice of transport modes (including walking, cycling and public transport). These settlements remain the best places to locate development. Access to employment opportunities is also important to ensure sustainability.

This Principle will support sustainable development by focusing new homes in accessible locations and avoiding isolated development in the countryside.

Relevant policies and evidence:

- **Chichester Local Plan Policies:** S2 Settlement Hierarchy, T1 Transport Infrastructure, T2 Transport and Development, T3 Active Travel – Walking and Cycling Provision
- **National Planning Policy Framework:** Paragraphs 83 and 84 (rural housing), paragraphs 110 (promoting sustainable transport) and 117a (considering development proposals)
- **Supporting Evidence:** Local Plan Policies Map, Settlement Hierarchy Background Paper (May 2024), WSCC Walking and Cycling Strategy 2016-2036, West Sussex Transport Plan 2022-2036, West Sussex Active Travel Strategy 2024 – 2036, Chichester Local Cycling and Walking Infrastructure Plan (Jan 2021), West Sussex Local Cycling and Walking Infrastructure Plan, LTN 1/20 Cycle Infrastructure Design, West Sussex Cycle Design Guide (Aug 2019).

Principle 2: Well-related to existing settlements

Housing sites should be well-related to existing settlements in terms of their design, their connectivity to the existing settlement and connections to sustainable transport

links. The size² of the development should be informed by, and sympathetic to, the size and character of the existing settlement.

Consideration of the suitability of sites, along with their design and layout, should ensure that new development is integrated in a manner which responds positively to the morphology and character of the settlement in terms of considerations such as settlement form, historical evolution of the settlement, and delineating features. For example, new development should generally seek to reinforce and consolidate existing patterns of development. This will protect the character of the existing settlement and surrounding countryside and prevent isolated or sporadic development which is clearly detached from the main settlement.

Relevant Policies and Evidence:

- **Chichester Local Plan Policies:** NE2 Natural Landscape, P1 Design Principles, P2 Local Character and Distinctiveness.
- **National Planning Policy Framework:** Paragraphs 83–84 (avoiding isolated homes), 135 (achieving well-designed places)
- **Supporting Evidence:** Settlement Hierarchy Background Paper (May 2024), Landscape Capacity Study (March 2019), Landscape Gap Assessment (May 2019), Local Plan Policies Map, National Design Guide.

Principle 3: Deliverable

Development proposals are required to demonstrate that they are deliverable³ from the time of the submission of the planning application, through the submission of a deliverability statement justifying how development will ensure quicker delivery.

The council will seek to impose time restricted conditions on planning applications to ensure early delivery of housing.

Relevant Policies and Evidence:

- **National Planning Policy Framework:** Paragraph 78 – 81 (maintaining supply and delivery).

Principle 4: Proactive pre-application engagement

Developer-led pre-application consultation should be carried out before a planning application is submitted, as effective proactive pre-application engagement helps communities and parishes to understand what is being proposed and provides an opportunity for them to positively shape proposals prior to a proposal being submitted.

² In this context 'size' refers to the overall extent and spatial footprint of a proposed development.

³ In accordance with the definition of deliverable set out in Annex 2 of the NPPF

As set out in the council's Statement of Community Involvement (SCI) developers should undertake pre-application consultation with local residents and other consultees. The SCI sets out the five engagement commitments in paragraph 3.1 (be clear about what we're doing, be inclusive, be accessible, be transparent, be accountable) and is clear that developers should follow these same commitments as part of their pre-application process. Paragraph 4.5 of the SCI sets out that developers undertaking pre-application consultation should:

- Set clear objectives and agree the consultation approach with Development Management, including who will be consulted;
- Let people know what the application is proposing and be clear about what they can influence by making comments;
- Use a range of engagement methods to maximise opportunities for people to influence the proposals. Particular steps should be taken to involve any seldom heard groups that could be affected by a proposal;
- Submit a statement alongside the final planning application outlining the community involvement work that has been undertaken. This should include a summary of any responses received at consultation and should explain how feedback has influenced the proposals.

Engaging early with parishes preparing a neighbourhood plan is essential. This allows parish councils to fully consider proposals and assess how they might affect the plan as it develops.

Relevant Policies and Evidence:

- **National Planning Policy Framework:** Paragraph 40 - 41