

Cllr Nikos Mikelis
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Our Ref:13985019

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Dear Cllr Mikelis,

Thank you for your email of 9 December, enclosing a letter written by seven parish councils to the Rt Hon Michael Gove MP, about the impact of large-scale housing development in East Sussex. We have been asked to reply on behalf of the Secretary of State. Due to the role of Ministers in the planning system, we are unable to comment on specific development proposals. However, we do hope that you find the following information helpful.

We would like to start by assuring you that the Government is very conscious of the effect that development can have on local communities and on our environment. We recognise that it is important to strike a balance between enabling vital development and growth, including the new homes we need, while continuing to protect and enhance the natural environment. Through the National Planning Policy Framework, we have made clear that the purpose of the planning system is to contribute to the achievement of sustainable development. We know how important this is to people in East Sussex, who rightly place a high value on the protection of their local environment.

Equally, there is no doubt we have not been building enough homes to meet our country's need for too long. To help achieve our manifesto commitment to deliver 300,000 homes annually by the mid 2020's, and one million homes over this Parliament, it is important that local authorities plan positively to meet their full housing needs. Our National Planning Policy Framework introduced the standard method for calculating local housing need which gives a starting point for local authorities in identifying the housing need in their area.

It is important to emphasise that local housing need does not set a target for the number of homes to be built. Local authorities take into account land supply, constraints, (such as Green Belt and National Parks), and cooperation with neighbouring authorities on whether need should be shared, before deciding their housing requirement. This recognises that not everywhere will be able to meet their housing need in full. As with all our policies, we will monitor the impact of the standard method, particularly as the effect of changes to the way we live and work and levelling up become clear.

We fully understand your concern about the number of houses that have been granted planning permission but which are not being delivered. The Government is clear that new homes should be built out as soon as possible once planning permission is granted. Where build-out is delayed, it is for councils and developers to work closely together to overcome any barriers. Although Sir Oliver Letwin's independent review of build out rates found no evidence that speculative land banking is part of the business

model for major house builders, nor that this is a driver of slow build out rates. The Government recognises that build-out is important to communities, and we are exploring further options to support faster build out as part of our proposed planning reforms.

The presumption in favour of sustainable development only applies where a local authority does not have an up-to-date local plan, a five-year housing land supply or it is delivering less than 75% of its housing needs as measured by the Housing Delivery Test (HDT). The latest HDT results show that the majority of those local planning authorities delivering 75% or less of their housing, and therefore subject to the presumption, had a plan over 5 years old at the time of publication. This underlines the importance of getting an up-to-date plan in place and proactively supporting development in a plan-led way. It is also the best way to protect an area from speculative and unwanted development. In order to avoid falling into the presumption, the Government is clear that authorities should work proactively with all relevant parties, including developers, upper and lower tier local authorities and utility companies, to identify actions to increase delivery, and set this out in an Action Plan.

Turning now to the issue of household projections, after uncertainty due to COVID-19, it is particularly important to provide stability and certainty for plan-making and decision-making, so that local areas can get on and plan based on a method and level of ambition that they are familiar with. As part of the consultation in 2020, the Government carefully considered whether to use the 2018-based household projections and concluded at the time that, in the interests of stability for local planning and for local communities, the 2014-based projections would be used. Household projections are not a measure of how many homes are needed to meet demand, they simply show what would happen if past trends continue.

The ONS has been clear that lower household projections do not mean fewer homes need to be built. In fact they said if new additional homes are not supplied then households cannot be formed as there would be nowhere for them to live. There are also other pressing factors at play, including the chronic affordability issues in many areas where demand for housing is high, as well as the historic under-delivery of new homes.

We understand your concern about the loss of agricultural land in Wealden. The Government places great importance upon our agriculture and food production, and this is reflected in the National Planning Policy Framework. The Framework requires local planning authorities to take into account all the benefits of the best and most versatile agricultural land. This means that where significant development of agricultural land is shown to be necessary, local planning authorities should seek to use poorer quality land in preference to that of a higher quality.

An important additional safeguard against the use of agricultural land for development is that an authority must consult Natural England before granting permission for non-agricultural development not in accord with the Local Plan which would involve the loss of 20 hectares of grades 1, 2 or 3a farmland. This requirement also applies to the loss of less than 20 hectares of agricultural land in circumstances that are likely to lead to a further loss of 20 or more hectares of land in those grades.

Finally, we are sorry that the Secretary of State is unable to meet you at the present time due to a large number of Parliamentary commitments. We would, however, like to take the opportunity to thank you for extending this offer.

Thank you, once again, for writing in on these important matters.

Yours sincerely

Planning Policy Division Correspondence Team