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Our Ref:16886613
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Dear Mr Beaumont,

Thank you for your email of 29 March to the Rt Hon Michael Gove MP, on behalf of the 11 Parish Councils in the Lewes District, about a number of planning matters, including the standard method for calculating local housing need, and the housing numbers for Lewes. We have been asked to reply on behalf of the Secretary of State. We are very sorry that you did not receive a reply to your original letter of 8 January.

We hope you will appreciate that, due to the quasi-judicial role of Ministers in the planning system, we are unable to comment on local issues or specific development proposals. However, we can offer the following general comments, which we hope you will find useful.

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 (NPPF), 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 Lewes, who rightly place a high value on the protection of their local environment.

Equally, there is no doubt that we have not been building enough homes to meet our country's need for too long. To support working towards our target to deliver 300,000 homes per year and one million homes over this Parliament, it is important that local authorities plan positively to meet their full housing needs. Our NPPF introduced the standard method for calculating local housing need which makes the process of identifying the number of homes needed in an area simple, quick, and transparent.

We would emphasise that Local Housing Need does not set a target for the number of homes to be built. Local authorities decide their own housing requirement once they have considered their ability to meet their own needs in their area. This includes taking local circumstances and environmental constraints, such as National Parks, into account and working with neighbouring authorities if it would be more appropriate for

needs to be met elsewhere. This recognises that not everywhere will be able to meet their housing need in full.

Nevertheless, the standard method should be taken into account, where it is relevant, in drawing up and assessing Local Plans, and as a material consideration in deciding planning applications. In particular, when locally set housing requirement policies become older than five years, and have not been updated, or have not been reviewed and found not to need updating, then the standard method should be used to determine the number of homes required for 5-year housing land supply purposes. This ensures that the local housing requirement is regularly reviewed and updated to reflect local demand.

It is worth noting, though, that Councils can only adopt a plan that is sound. A sound plan should be consistent with national policy, be positively prepared, effective, and based on proportionate evidence. Each plan - including the approach to housing requirements - is subject to a public examination in front of an independent Inspector, who plays an important role in examining plans impartially to ensure that they are legally compliant and sound.

The 2014-based household projections are used within the standard method to provide stability for planning authorities and communities, to ensure that historic under-supply and declining affordability are ultimately reflected in housing requirements, and to support the Government's objective of significantly boosting the supply of homes. The Office for National Statistics (ONS) has been clear that lower household projections do not mean fewer homes are needed - in some circumstances they reflect existing undersupply, where lack of new housing provision stops new households from forming. The ONS has also noted that household projections are not forecasts; they do not attempt to predict the impact of future public policy, changing economic circumstances or other factors that may influence household growth.

We would like to assure you that the Government are monitoring the effect of the standard method, particularly as the effect of changes to the way we live and work and levelling up become clear.

We would emphasise that the absence of an up-to-date Local Plan, or a 5-year housing land supply, does not mean that development should automatically be approved. This is particularly so if any adverse effects of doing so would clearly outweigh the benefits, or if the application of policies in the NPPF protecting important areas or assets provides a clear reason for refusing an application when assessed against policies in the NPPF as a whole. Each case is considered on its merits and only planning matters may be taken into consideration. However, an effective, up to date Local Plan, which includes a 5-year supply of deliverable housing sites, is the best way to protect an area from speculative and unwanted development.

We understand your concern about the number of unbuilt permissions across the Lewes District. The Government has been clear that developers should build-out their planning permissions as quickly as possible. Where permission has been granted for

new development, or where sites are stalled or experiencing delays to being delivered, it is for local authorities and developers to work closely together at a local level to overcome any barriers. There are instances where delays in starting or progressing sites may be avoidable and the Government wants to empower authorities with the tools to respond to such cases. Consequently, we are exploring options to support faster build out as part of the wider package of proposed planning reforms.

You also mention the prioritisation of brownfield sites. This Government strongly encourages the re-use of suitable brownfield land, especially for development to meet housing need. As set out in the NPPF, planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements. We have introduced a number of planning reforms to support our brownfield approach, including successfully requiring every local authority to publish a register of local brownfield land suitable for housing in their area. Nationally, the registers identify over 28,000 hectares of developable land, enough for one million homes. We have also introduced "Permission in Principle" to speed-up housing-led development on land included in brownfield registers, giving certainty from the outset that redevelopment is acceptable in principle. There is no doubt, however, that brownfield sites vary greatly in their suitability for re-use. Local authorities are best placed to identify sites and to decide if they are suitable to redevelop.

We share your concern to ensure that wildlife and biodiversity are protected and enhanced. In this respect, the NPPF is clear that planning policies and decisions should minimise the impacts on biodiversity and provide net gains. The Environment Act's new requirements for biodiversity net gain (BNG) will begin commencement from 2023, meaning most types of new development will deliver improvements of 10 per cent or more for biodiversity. We are working in accordance with the principles in the Environment Act 2021 to ensure that development results in environmental improvement, rather than merely preventing harm. Existing areas designated for environmental protections will continue to be upheld.

Finally, we are sorry that the Secretary of State will not be able to meet you due to a busy round of Parliamentary commitments. However, we would like to thank you for extending this kind offer.

With thanks again for writing in on these important matters.

Yours sincerely

Planning Policy Correspondence Team