



Lewes District Council

Secretary of State
Ministry of Housing, Communities
& Local Government
2 Marsham Street
London
SW1P 4DF

Sent to: angela.rayner.mp@parliament.uk
correspondence@levellingup.gov.uk

Cc: james.maccleary.mp@parliament.uk
chris.ward.mp@parliament.uk
mims.davies.mp@parliament.uk

23rd August 2024

Dear Secretary of State,

Playing your part in building the homes we need

I write in response to your letter to Leaders and Chief Executives in England of 30th July 2024 and the government's consultation on the National Planning Policy Framework (NPPF). Before I directly address the points most relevant for Lewes District Council (LDC) in your letter, it is important to provide the local geographic and demographic context, and which underpins the concerns expressed in my letter.

Background to Lewes District

1. Lewes District covers an area of 292 sq. km, and has a population of 103,525, of which it is estimated that approximately 79,000 (around 75%) is located outside of the National Park in the main urban areas of Newhaven, Peacehaven, Seaford and Telscombe Cliffs/East Saltdean, Ringmer and Newick. The South Downs National Park (SDNP) covers just over half of our geographic area, including the town of Lewes. The Park Authority is the responsible local planning authority for the areas of the district within its boundary.
2. The district benefits from good access to the trunk road network, with the A27/A26 linking the coastal towns to neighbouring Brighton and Eastbourne and the nearby A23/M23 providing access to London, Gatwick and the M25. The area is served by a number of key A roads, including the A259, which links the coastal communities, and the A26, A272 and A275, which are key routes through the northern part of the district. Newhaven and Seaford are linked by rail connections to London and Gatwick and towns along the Sussex coast and beyond. The port of Newhaven provides cross channel passenger and freight services to Dieppe in France.
3. The coastal towns are tightly enclosed by the National Park and comprise of a coastal environment characterised by chalk cliffs and shingle beaches with significant parts of Seaford and Newhaven constrained by risk of flooding from the River Ouse or inundation from the sea. The area of the district to the north of the National Park differs and is typified by a gently undulating low weald landscape, abundant woodland and river valleys, interspersed by small rural villages. The city of Brighton & Hove to the southwest exerts a strong influence on the

Lewes District Council
6 High Street
Lewes BN7 2AD

Chief Executives Office
Zoe.Nicholson@lewes.gov.uk
Laurence.OConnor@lewes.gov.uk

district, as do the towns of Haywards Heath and Burgess Hill in Mid Sussex, albeit to a lesser extent.

Local Plan, housing target and reforms to the NPPF

4. LDC adopted its current Local Plan Part 1 in 2016, (Part 2 in 2020) having jointly prepared it with the South Downs National Park Authority (SDNPA). While LDC was able to adopt the plan, a legal challenge prevented the SDNPA from adopting the plan, it instead prepared a new plan which it adopted in 2019.
5. With the introduction of the Standard Method in 2018, our housing need more than doubled to 782 homes per annum. Our adopted Local Plan set a housing requirement for 345 dwellings per annum for the whole of the district, i.e. including the area of the district for which the SDNP is the planning authority. In May 2021, upon reaching the fifth anniversary of adopting Part 1, for the purposes of the five-year housing supply the council published its approach to housing need for its plan area. This gave the district a housing need of 602 dwellings per annum.¹
6. However, with the increased housing target we are in the position that our adopted Local Plan, which was prepared and adopted within the existing planning framework, has become 'out of date' and our district is subject to 'presumption in favour of sustainable development'. This has subjected that authority to applications for development which do not accord with the adopted plan and do not support the holistic needs of our communities. The district's area for which we are preparing the Local Plan has numerous constraints, which are having an impact on our ability to meet our housing need.
7. While LDC commenced work on a new Local Plan in 2020 and has carried out two hugely successful rounds of public consultation (our Issues and Options consultation attracted approximately 42,000 individual comments) our task of preparing the new Local Plan has been beset by a national policy environment in flux. Since we started work on the Local Plan, there have been three revisions to the NPPF, the last of which was in December 2023. The current NPPF consultation will result in the fourth NPPF against which our Local Plan is being prepared.
8. With each revision to the NPPF, we have had to take time to consider the implications and inevitably had to delay the submission of the Local Plan. Until now we were working towards publication of our Regulation 19 consultation in the winter but, with your letter and the proposed changes in the NPPF, you are effectively inviting us to go back to an earlier stage and, as you acknowledge, delay submitting our plan. My officers are now having to 're-visit'. Regrettably, our communities are going to be subjected to a further period without a Local Plan in place, and open for further unplanned development. I ask you to consider affording us protection from unplanned development for any period which extends beyond 30th June 2025, and ahead of adoption of our new plan.
9. Additionally, I am asking that you consider through the reforms to national policy how you can provide certainty and clarity to local planning authorities such as us. While there is reference in the NPPF to National Parks, it is not clear whether the 'automatic' exceptional circumstance will be given the same level of consideration for the local plans of planning authorities hosting a National Park. I would argue that authorities such as Lewes District should not have to meet their housing needs in full under the revised framework because, while we have 77% of the districts housing stock, we only have ~49% of the district's land.

¹ [Approach to Calculating Local Housing Need for purposes of Five Year Housing Land Supply.pdf \(lewes-eastbourne.gov.uk\)](#)

Social and affordable housing

10. I welcome the announcements of measures to support social and affordable housing. Increasing provision of affordable housing, including social housing, will not only provide homes for those most in need, but it will also relieve the financial pressures on local authority budgets, which are increasingly becoming difficult to balance.
11. However, as you say, its about the right homes, in the right places, with the necessary systems and infrastructure included to ensure we are developing thriving and sustainable communities. The need for sustainable housing is paramount to ensure that our homes are truly affordable for our residents considering the total household cost when it comes to assessing affordability in this cost-of-living crisis.
12. It is also essential that Registered Social Landlords are given greater capacity, freedoms, and flexibilities by this government to ensure affordable housing allocations on new developments are actually delivered. We are finding too often that Registered Providers and Housing Associations are not taking up affordable housing through Section 106 Agreements due to a lack of financial capacity and therefore puts those allocations at risk, which undermines your directive to deliver more affordable and social housing.
13. Also, I refer you to my joint letter with Eastbourne Borough Council sent to your office dated 1st August 2024: 'securing the future of council housing'. LDC is one of less than 25% of councils in the UK that has built any housing in the last 10-years, developing a pipeline of quality, sustainable, and affordable housing to meet a range of local needs. The current financial position of our Housing Revenue Account (HRA) is however not sustainable and the measures we endorse as set out in the Southwark Council report articulate what is needed, both immediately and long-term, to enable accelerated council house building again in this country. This includes addressing the systemic homelessness problem and urgent need for better and more affordable forms of temporary accommodation provision.

Further reforms to the Planning system

14. We will of course be submitting our formal response to the consultation on the NPPF, but it is as equally important that I am able to raise these concerns directly with you and your civil servants. If you consider having a meeting would be helpful, then we would be more than willing to host you in our district, so that you are able to enjoy the beauty of our part of England but also to see firsthand for yourself the challenge that you are setting for us.
15. While we await details of further changes to the planning system, we would stress the need to have stability, so that local plans are in place giving local people the necessary controls over their communities and what development takes place in them.
16. Finally, again, I ask you to consider affording us protection from unplanned development for any period which extends beyond 30th June 2025, and ahead of adoption of our new plan. Also, to consider through the reforms how you can provide us more certainty and clarity.

Yours sincerely,



Councillor Zoe Nicholson
Leader of Lewes District Council



Councillor Laurence O'Connor
Cabinet Member for Planning and Infrastructure

Lewes District Council
6 High Street
Lewes BN7 2AD

Chief Executives Office
Zoe.Nicholson@lewes.gov.uk
Laurence.OConnor@lewes.gov.uk