



The countryside charity  
Sussex



Sussex  
Wildlife Trust

By email only to:

Caroline Ansell MP  
Peter Bottomley MP  
Maria Caufield MP  
Mims Davies MP  
Nus Ghani MP  
Nick Gibb MP  
Andrew Griffin MP  
Sally-Ann Hart MP  
Gillian Keegan MP  
Peter Kyle MP  
Tim Loughton MP  
Caroline Lucas MP  
Huw Merriman MP  
Jeremy Quin MP  
Lloyd Russell-Moyle MP  
Henry Smith MP

15 April 2021

Dear

### **Help us create thriving places for people and wildlife**

We are writing to you on behalf of CPRE Sussex, the countryside charity and the Sussex Wildlife Trust. Both charities campaign for a planning system that empowers local communities and protects and enhances the rich biodiversity of Sussex.

A fit-for-purpose planning process has the power to ensure everyone has a decent home, that meets their needs and that they can afford. New homes should be inspiring and beautiful places to live, where people and nature thrive together.

Thank you for successfully highlighting the damaging consequences of the 'mutant algorithm' proposed in last year's consultation on changes to the planning system.

The next area where changes would be welcomed is in relation to 'out of date' Local Plans. If a Local Plan is not successfully reviewed within 5 years (as with Chichester, Horsham, Wealden, Eastbourne and Lewes) then the standard method figure, set out in the NPPF since 2018, becomes the default housing target. Although a council may have been through a Local Plan process which correctly identifies 'constraints' on development and sets an appropriate housing target, this is then disregarded and the 'standard method' figure, produced by an algorithm, becomes the default. (Please see Appendix 1 for more information.)

The other main way in which a Local Plan becomes 'out of date' is through under-delivery of housing by developers. As pointed out in the Letwin Review of 2018:

<https://www.gov.uk/government/publications/independent-review-of-build-out-final-report> developers will only build to an acceptable profit.

To promote, enhance and protect a thriving countryside for everyone's benefit

President: Lord Egremont

Campaign to Protect Rural England Sussex Branch CIO | Registered charity number: 1156568

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The majority of Local Plans in Sussex are currently considered 'out of date' for one or both of the above reasons. In effect, this overrides the ability of councils to appropriately balance the need for new homes with wider needs for environmental protection and restoration.

Local Planning Authorities (LPAs) increasingly see the standard method as a 'target' for plan making, believing that unless this number is reached or exceeded, the plan will fail at examination under the 'Duty to Cooperate.' For example, the recent Direction of Travel Document for the Wealden Local Plan stated that: *'We must also be clear from the outset that our housing requirement is one that is set for us and one that we must meet to assist in delivering the national shortage of homes.'*

Ultimately the reliance on the standard method in Sussex is leading to more unsustainable car-dependant development, whilst brownfield sites lie idle. At a time where all Sussex councils have made a declaration of a climate emergency, this cannot continue.

The fact is, that the Government's planning reforms and vision of a better system will fall at the first hurdle if the housing targets are unsustainable and unachievable.

Local Authorities must be empowered to determine precisely how many homes to plan for and where those homes most appropriately located, fully taking into account the wider environmental land use needs for their area, instead of relying on an algorithm. We **urgently** need to see the abolition of the Housing Delivery Test and to ensure that the standard method does not become the 'default' housing target where a Local Plan is considered 'out of date'.

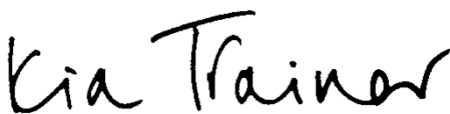
We would be happy to meet to discuss this issue further. We would be grateful if your office could email [info@cpresussex.org.uk](mailto:info@cpresussex.org.uk) with some suggested times and dates, and we can arrange a meeting with specialists on this topic from both our organisations.

We know that you feel passionately about the landscape and environment of your constituency, and we hope we can support you in defending it in the face of this unprecedented threat.

We look forward to meeting with you.

Yours sincerely,

**Kia Trainor**



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**Tor Lawrence**



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## Appendix 1

In its recent response to the consultation on changes to the current planning system ([Government response to the local housing need proposals in “Changes to the current planning system” - GOV.UK \(www.gov.uk\)](#)) there was a clear statement that;

*“Many respondents to the consultation were concerned that the ‘targets’ provided by the standard method were not appropriate for individual local authority areas. Within the current planning system the standard method does not present a ‘target’ in plan-making, but instead provides a starting point for determining the level of need for the area, and it is only after consideration of this, **alongside what constraints areas face**, such as the Green Belt, and the land that is actually available for development, that the decision on how many homes should be planned for is made..... **It is for local authorities to determine precisely how many homes to plan for and where those homes most appropriately located. In doing this they should take into account their local circumstances and constraints.**”*

However, if a Local Plan is not successfully reviewed within 5 years (as with Chichester, Horsham, Wealden, Eastbourne and Lewes) then the standard method figure becomes the default housing target. In March 2016 an Inspector agreed a housing number for Lewes District in East Sussex of 345 homes per annum on the grounds that 50% of the area is in the South Downs National Park and that it is constrained by traffic, flooding and habitats issues. None of these issues have changed, however because the plan is considered ‘out of date’ the current housing target is almost 800 homes per year. In Wealden, where over 50% of the district is within the High Weald AONB, the adopted housing target within the Core Strategy is 450 dwellings per annum but the council is currently measured against the standard method figure of 1,225 homes per annum. Over two thirds of Chichester district lies within the South Downs National Park, yet its housing target has jumped from the 435 dwellings per annum target in its Local Plan to over 630 per annum under the standard method.

The purpose of the Standard Method (<https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>) is to calculate 'minimum annual local housing need'. And that resultant figures will in certain instances be increased because the Duty to Cooperate requires Councils with undesignated countryside (Arun, Horsham and Mid Sussex for example) to accommodate the 'unmet needs' of councils that are deemed not to have the capacity to meet all of their Standard Method targets.

Local housing need is not reflected in the standard method which is simply an algorithm designed to achieve a countrywide total of 300,000 homes a year. The natural rate of population change in most Sussex LPA's is negative. The continued reliance on the 2014 household projections as the starting point for assessing the "need", despite two subsequent iterations of the projections in 2016 & 2018 indicating a reduction in the rate of formation of new households, illustrate the contrived nature of the calculation.

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