

1 June 2020

Rt Hon Robert Jenrick MP
Secretary of State
Ministry for Housing, Communities & Local Government
2 Marsham Street
London
SW1P 4DF

Dear Secretary of State,

East Sussex Local Authorities and Brighton & Hove City Council are writing to you to endorse the recent comments and request for intervention made by the West Sussex Authorities, regarding the effects of the Covid-19 outbreak on the planning system.

Our belief is that the effective functioning of the planning system is likely to be a key component of the economic recovery within East Sussex. Like the West Sussex authorities, we are particularly keen that the Government continues to support the plan-led approach as a means of delivering the right homes at the right times in the right places and to offer certainty and confidence to councils, communities and the development industry, as we emerge from the current Covid-19 crisis.

Since lockdown started, work on many development sites across the country has stopped. Research by the consultancy Knight Frank has suggested that as a result of the current crisis housing delivery this year could be 35% lower than expected¹. We are concerned about the significant implications of the reduction in housing delivery on the sustainable future of our areas due to the resultant impact on Housing Delivery Test results and the ability to maintain a five year housing land supply. As you will be aware, the implications of both failing the Housing Delivery Test and not being able to demonstrate a five-year supply of housing land are that the Local Plan is deemed 'out of date', resulting in the application of a 'tilted balance' towards granting permission, where there are no landscape or ecological designations affected. This could give rise to speculative and unplanned development that has the potential to threaten the character and otherwise sound planning of our areas.

We share our neighbouring county's concerns that the current situation will result in unsustainable development as a result of the development sector:

- seeking to renegotiate S106 Agreements because of the impact of Covid-19, especially to reduce the affordable housing component;
- requiring the above before considering options to recommence building;
- challenging the 5-year housing land supply on the basis that the current near cessation of building will slow housing delivery and the trajectories carefully developed by councils;
- seeking permission for sites not in conformity with agreed Plans; and

¹ <https://www.knightfrank.co.uk/research/article/2020-04-27-new-private-housing-delivery-set-to-stall>

- practising increased land banking and a slow recommencement of building after lockdown is lifted to strengthen balance sheets.

It is important for the sustainable planning of our areas that our five year housing land supplies and the plan-led approach are not undermined by the reduction in housing delivery as a result of the current crisis, and that the development sector is encouraged to take a responsible approach towards delivering much needed housing in properly planned locations as soon as possible.

In order to avoid the above consequences that would be detrimental to the delivery of housing, to the sustainability of our areas and costly to the public purse, the interventions that are requested by West Sussex Authorities, and that we strongly endorse, are:

- A suspension and/or roll forward of 5-year land supply arrangements, to acknowledge the lost supply during lockdown and to avoid a surge of speculative applications;
- Consequent changes to the Housing Delivery Test;
- Powers to extend the life of existing planning consents by the period of the lockdown;
- Tying extension to the life of existing consents to firm timescales for (re)commencement of sites;
- Proactive work and widespread intervention by Homes England with planning authorities and developers to support the resumption of development on allocated sites as quickly as possible;
- Incentives to social registered landlords to resume work on their sites;
- Consideration of using schemes such as the old 'Homebuy Direct' to enable any supply hangovers to be absorbed quickly as affordable housing; and
- Extending Local Plan review timescales.

We hope that you appreciate our concerns, and share our desire to ensure that certainty is provide to councils, the community and the development industry in order to provide the right homes at the right times in the right places and get sustainable housing delivery back on track through a properly plan-led approach.

Yours sincerely



Cllr Zoe Nicholson
Leader, Lewes District Council



Cllr David Tutt
Leader, Eastbourne Borough Council



Bob Standley
Leader, Wealden District Council



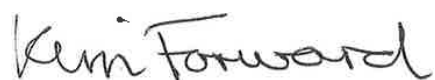
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