

HIPP

HERTFORDSHIRE INFRASTRUCTURE & PLANNING PARTNERSHIP

Councillor Mandy Perkins Chair, HIPP c/o Welwyn Hatfield Borough Council, Council Offices, The Campus, Welwyn Garden City, Hertfordshire AL8 6AE

DRAFT

BY EMAIL

Planning Policy Consultation Team
Department of Communities and Local Government
3rd Floor - Fry Building,
2 Marsham Street
LONDON SW1P 4DF

22 February 2016

Dear Sir/Madam

CONSULTATION ON PROPOSED CHANGES TO NATIONAL PLANNING POLICY

I write on behalf of the Hertfordshire Infrastructure and Planning Partnership (HIPP) that represents all ten District/Borough Councils and the County Council in Hertfordshire. Many of our Members will be providing you with detailed comments as part of your consultation but we believed it also appropriate to highlight to you a number of strategic concerns which are listed below.

HIPP welcomes measures aimed at helping local authorities to increase the provision of homes that are built in appropriate locations to meet local needs and that are part of sustainable communities that provide jobs as well as housing. However we do have concerns about some of the changes that are suggested which could have a negative impact on delivery.

Affordable housing

The proposed change to the definition of affordable homes to include a wider range of low cost home ownership options, including starter homes, could reduce the number of homes available for rent. In addition, the removal of the requirement to be affordable in perpetuity will also reduce the overall stock of

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affordable housing. This will have a negative impact on local authorities providing housing for those in most need.

HIPP also maintains that it should be the responsibility of the individual local planning authority to determine the local split between affordable rented housing, intermediate products and starter homes. This is about meeting local housing need and policy should be set locally in local plans based on the evidence contained in the Strategic Housing Market Assessment and subject to local viability issues.

In addition the starter homes proposal combined with the 'right to buy' arrangements means that homes will be provided without the necessary Section 106/Community Infrastructure (CIL) contribution placing further pressure on local infrastructure.

Increasing residential density around commuter hubs

HIPP agrees in principle with increasing densities around commuter hubs but that the NPPF should not be prescriptive about the level of densities. There will be places where densification can have negative impacts, such as increasing congestion on local roads, and it should be for the local planning authority to determine what is appropriate given local circumstances.

Supporting new settlements

HIPP would welcome greater policy support for sustainable new settlements in appropriate locations where there are good transport connections and where the necessary infrastructure can be provided.

Supporting housing development on brownfield land and small sites

HIPP supports the development of brownfield land and small sites provided that it is not at the expense of other land uses. Also many brownfield sites are poorly located and their development could generate significant traffic movements and consequently they should only be considered if they have good access to infrastructure and jobs.

Ensuring housing is delivered on land allocated in plans

Housing delivery is not just the responsibility of local planning authorities but also house builders. As local planning authorities do not build the houses or have any control over the developers it would be unfair to hold local authorities accountable for something which is outside their control. It is unlikely that a housing delivery test would encourage developers to build more houses as there is no direct reward or sanction.

Supporting delivery of starter homes

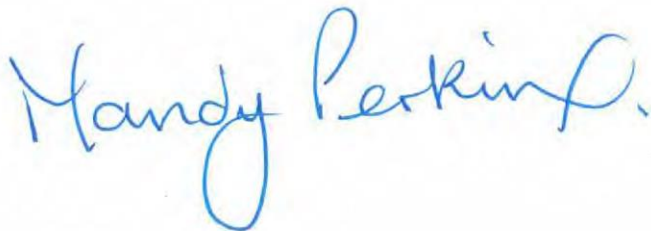
It is important that the provision of land for starter homes is not at the detriment of employment land. There needs to be a carefully struck balance between

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residential and employment land. Sustainable communities require jobs as well as housing and the Local Plan provides the best mechanism to support this. Permitted development changes have already significantly reduced the stock of employment land and it is important that adequate employment land is protected in the long term. The suggestion that commercial or industrial land could be vacant for no longer than 3 years before being released would effectively make it impossible to plan for a fifteen year period.

Yours faithfully,



Cllr Mandy Perkins
Chair, Hertfordshire Infrastructure & Planning Partnership

cc All Hertfordshire MPs

Charles Walker MP
The Rt. Hon. Michael Penning MP
Mark Prisk MP
Oliver Dowden MP
The Rt. Hon. Peter Lilley MP
Sir Oliver Heald QC MP
Anne Main MP
David Gauke MP
The Rt. Hon. Grant Shapps MP
Richard Harrington MP
Stephen McPartland MP

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