

**By email only:**  
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Our Ref: Planning-making reform

Your Ref:

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**Levelling-up and Regeneration Bill: consultation on implementation of plan-making reforms - Published 25 July 2023**

Please find below the response from North Herts Council in relation to your recent consultation on the reforms to national planning policy.

North Herts Council has recently adopted its Local Plan following an examination period in excess of 5 years (June 2017 – November 2022). This experience alone raises questions as to the ambitious timescales that are proposed in the plan-making reforms published in July of this year. Nevertheless, we are committed to plan-making, alongside community engagement and consultation.

Government has put forward a number of differing proposals for national planning policy reform since 2020. This has resulted in significant uncertainty for us and our neighbouring authorities. Contrary to the objective of facilitating local plan-making, the short-term effect of announcing these proposals has been to slow down/halt the progress of local plans in many areas across the country.

We support the prioritisation of a plan-led system and the protection from speculative development. However, as indicated above, the 30-month timeline for plan preparation is seen as unachievable for a number of reasons including, but not limited to:

- Local Authority resourcing including staffing levels and skills which will continue to be a barrier on progress and quality in plan-making
- Funding available to Local Authorities to support these proposed reforms
- Digital technology
- Expansion of areas of expertise including, for example, Design Codes etc

Another key area of concern is around the capacity of PINS to respond to the proposed procedural changes, and importantly how PINS will be held accountable for the delivery of a quality service that represents value for money.

The consultation fails to address some of the current main barriers to local plan progress including, but are not limited to:

- how housing needs will be addressed in areas of constraint, especially in areas with Green Belt designations
- where there are major challenges around nutrient or water neutrality
- where new/improved infrastructure is needed to unlock barriers to development opportunities

There are significant cross-boundary matters in the plan-making system that are linked to process; however, the consultation document contains no specific information regarding the future of Duty to Co-operate under the new system or the previously proposed 'alignment test'. This policy area will be key in setting a strategic planning approach, so it will be crucial that this should be addressed going forward.

We would urge you seriously consider the responses of Local Authorities across the country which we believe will follow a similar nature to ours, as was clearly seen from the webinars and workshop days that were held over the summer. Whilst there is the opportunity for reform in the plan-making process, these need to be the right reforms in the right areas over achievable timescales.

I hope that this response to the consultation is of use to shaping future proposals. Please do not hesitate to contact me should you require any further information.

Yours faithfully,



Ian Fullstone

**Service Director, Regulatory**