



HERTFORDSHIRE INFRASTRUCTURE & PLANNING PARTNERSHIP

Dear Sir/Madam

Levelling-up and Regeneration Bill: consultation on implementation of plan making reforms - Hertfordshire Infrastructure & Planning Partnership Response

I write on behalf of the Hertfordshire Infrastructure & Planning Partnership (HIPP) in response to the consultation on implementation of plan-making reforms.

HIPP comprises the planning portfolio holders and heads of planning from the eleven councils in Hertfordshire as well as representation from the Hertfordshire Local Enterprise Partnership and others.

HIPP's overarching purpose is "to provide a forum to discuss and develop a shared view and to propose joint work programmes on planning and infrastructure issues of common concern, working co-operatively within Hertfordshire and across county borders."

The Councils in Hertfordshire committed to delivering good growth in order to support the economy, deliver much needed homes and help tackle climate change.

This letter represents the views of HIPP on the **consultation on implementation of plan-making reforms**.

The councils in Hertfordshire are all at different stages in the plan-making process with some progressing plans under the current system, and others looking to prepare new-style local plans. All councils are committed to plan-making, alongside community engagement and consultation.

As a general point HIPP is concerned that the government has put forward a number of differing proposals for national planning policy reform since 2020. This has resulted in significant uncertainty for local authorities and other stakeholders. 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.

In relation to the latest consultation on plan-making reforms, whilst HIPP is generally supportive of many of the proposed changes, including the prioritisation of a plan-led system, there are a number of areas of concern, not least the 30-month timeline for plan preparation which is seen as unachievable.

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.

HIPP is also concerned that the consultation fails to address some of the current main barriers to local plan progress. These include, 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; or where new/improved infrastructure is needed to unlock barriers to development opportunities.

Moreover, 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.

There are also areas where further clarity is required. For example, whilst the proposals to extend the transitional protection from speculative development are fully supported, it should be made clear that any plan which becomes more than 5 years old prior to the new system coming into force should likewise be protected in the interim.

Finally, it is also important to acknowledge the significant gap that currently exists in resourcing and skills which will continue to be a barrier on progress and quality in plan-making. This is especially important given the expansion of areas of expertise that will be required under the new system, such as digital technology, design codes, etc.

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

Yours sincerely

Cllr Jeremy Newmark

HIPP Chair