



HERTFORDSHIRE INFRASTRUCTURE & PLANNING PARTNERSHIP

Dear Sir/Madam

Planning Reform Working Paper: Speeding Up Build Out

Hertfordshire Infrastructure & Planning Partnership Response

I write on behalf of the Hertfordshire Infrastructure & Planning Partnership (HIPP) in response to the planning reform working paper on speeding up build out.

HIPP comprises the planning portfolio holders and heads of planning from the eleven councils in Hertfordshire as well as including representation from other stakeholders.

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 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 planning reform working paper on speeding up build out.

The councils in Hertfordshire are committed to swift decision-making to support the delivery of new homes but remain concerned that a wave of planning reforms presents significant uncertainty for local authorities and other stakeholders. It is unclear how the combination of recent, emerging and promised reforms will knit together and subsequent proposals to load the planning system with new responsibilities places additional burdens on already stretched teams.

HIPP is very supportive of the timely delivery of homes and has been consistently concerned regarding the variation between trajectories presented at local plan examinations and our practical experience on the ground. With failure to deliver seen as a local authority issue when there are few tools available to encourage faster delivery timetables, HIPP understands the desire to provide such tools. However, we question whether the proposals will achieve improvement overall when balanced against the addition of further administrative procedures and responsibilities. Local authorities are under constant pressure to approve more homes, and the refusal of applications based on previous slow delivery is likely to be a difficult balance to strike.

Procedurally, there are concerns regarding the process of notifications, who authorities are *enforcing* against when multiple builders are delivering strategic sites and who acts as an adjudicator in the decision-making process. The practical process of enforcement is unclear and references such as 'unreasonably slow' suggest a balance should be struck by local authorities which may lead to inconsistencies.

The proposals aim to support SMEs to deliver more sites, but it is unclear how the proposals achieve this objective if a consequence is increasing bureaucracy and adding cost to the overall process which SMEs might be less well placed to support.

Proposals to date fail to address some of the main barriers to slow delivery which often relate to cashflow and front-loading of infrastructure. It is imperative that funding gaps are addressed, and infrastructure is supported to unlock sites. Hertfordshire has an infrastructure funding gap in excess of £3.5bn and lack of funding is slowing delivery and frustrating local residents who accept growth and expect the timely provision of supporting infrastructure.

We consider that the ability to understand data from annual completion surveys might be a productive step so that Government can monitor and report on that data and record it by supplier. Evidence to support potential process improvements might be better informed by local data which should be compiled at the national level. In Hertfordshire, completion data is collected annually, and we would welcome the opportunity to work with MHCLG on potential reporting which should not place significant new burdens on existing teams.

Finally, it is also important to acknowledge the significant gap that currently exists in resourcing which will continue to be a barrier if the expectation is that the planning system will be required to increase monitoring and enforcement. Resource constraints within the planning sector and in particular Local Planning Authorities is a known problem and whilst some positive steps are being taken by the government to address recruitment and retention issues, they do not go far enough.

Furthermore, we are concerned that the recent government announcement that Level 7 apprenticeships will no longer be eligible for levy funding (unless the apprentice is under 22 years, or under 25 years old with an EHCP or care leaver status), will have a negative impact on the ability of Local Planning Authorities to attract and train planners on the basis that levy funding is restricted to those under 22 years old. This age limit does not reflect the reality of those training as planners, many of whom will already have an undergraduate degree before deciding to train as a planner.

Linked to this, we would be keen to receive an update on plans to recruit 300 new planners into the public sector by 2026.

Should these build out proposals progress, HIPP would welcome the opportunity to support discussions regarding the practicality of process improvements and would propose workshops with a range of pilot authorities who will be dealing with a variety of different schemes.

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. The main officer contact for HIPP is Sara Saunders, Director for Place at East Herts. Please contact either Cllr. Allen via email at daniel.allen@north-herts.gov.uk or Sara Saunders at sara.saunders@eastherts.gov.uk

Yours sincerely

Cllr Daniel Allen
HIPP Chair