

The logo for Hertfordshire Infrastructure & Planning Partnership (HIPP) features the letters 'HIPP' in a bold, magenta, sans-serif font.

HERTFORDSHIRE INFRASTRUCTURE & PLANNING PARTNERSHIP



Hertfordshire
Growth Board

24 September 2024

Dear Sir/Madam

RE: Consultation on the National Planning Policy Framework (NPPF) – September 2024

Thank you for the opportunity to comment on the government’s consultation proposed changes to the National Planning Policy Framework (NPPF). This letter represents the collective comments of the Hertfordshire Infrastructure and Planning Partnership (HIPP) on the proposals on behalf of Hertfordshire Growth Board (HGB).

The Hertfordshire Infrastructure & Planning Partnership, or “HIPP,” comprises the planning / transport portfolio holders and heads of planning from the eleven councils in Hertfordshire as well as representation from Hertfordshire Futures (Local Enterprise Partnership) and others. The partnership is supported by Hertfordshire Planning Group, comprising heads of planning and invited guests, as well as sub-groups which bring together planning policy managers and development management managers.

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.”

HIPP welcomes the opportunity to comment on the proposed reforms to the NPPF. HIPP recognises that the Government is committed to increasing the number of homes delivered nationally and has made a commitment to delivering 370,000 homes each year. Hertfordshire has committed to building an additional 100,000 homes and generating 100,000 new jobs over the next 10 years ensuring residents and businesses thrive. We are working with Homes England and other partners to deliver 24,000 new homes at Harlow-Gilston Garden Town and 10,000 Hemel Garden Communities. Other new settlements are also proposed through District Local Plan processes, alongside supporting new significant and critical infrastructure across the County, including renewables, creative sector, medical technology/research and data centre development. We have also published a Development Quality Charter to encourage higher quality design and sustainability standards in new buildings.

HIPP is generally supportive of a brownfield first approach (in sustainable locations) and supports the principle of defining a Grey Belt to prioritise development of the lowest-performing sites in the Green Belt. However, the proposed definition of Grey Belt requires further clarification, alongside safeguards to ensure that development occurs in sustainable locations to avoid piecemeal sites being brought forward in remote or isolated areas away from key services.

The introduction of golden rules is considered a proactive way of securing public benefit from land released from the Green Belt, and HIPP agrees that where development involves the provision of housing, at least 50% should be affordable housing.

HIPP agrees that local areas are best placed to decide the right mix of affordable housing for their communities and would like to see all rents in the social sector linked to local incomes rather than the market (as is the case for Affordable Rent) to reflect local pressures more accurately. This links to the need for clarity around Grey Belt affordable housing provision and ensuring that viability concerns do not result only in flatted development if that does not accord with a local authority's need for houses.

HIPP supports the proposed revisions to the NPPF to increase support for renewable energy schemes, tackle climate change and safeguard environmental resources. Water, sewerage infrastructure and drainage are emerging as important strategic issues, and it is important that we improve water supply resilience.

The proposed changes to planning applications fees are welcomed, but do not go far enough. The Government needs to address the significant gap that currently exists in resourcing and skills which will continue to be a barrier on progress and quality in decision-taking and plan-making. We welcomed the announcement in the summer about providing 300 more planners but we are clear that there will need to be other measures put in place to support ongoing resourcing issues in the public sector, particularly those in supporting technical roles (e.g. ecologists, flood engineers).

The transitional arrangements for emerging plans should ensure the progress of plans at more advanced stages of preparation. For other plans there is ongoing uncertainty so further details of the Government's intentions around plan-making reform should therefore be published as soon as possible. In particular, the creation of National Development Management Policies should be prioritised and the process for agreeing them clearly set out.

In addition to transitional arrangements being brought into place for local plans, it is important that clarity should also be provided around whether these would also apply for neighbourhood plans. If separate provisions would apply, these should be clearly set out.

Lastly, HIPP welcomes the renewed emphasis on effective co-operation on cross boundary and strategic planning matters, however, there is limited information in the consultation document with details to be agreed regarding both the geographical areas for strategic plans and the legislative context for them. As you may be aware Hertfordshire is already committed to strategic planning and over the past two years has been working to make this happen, including exploring options for new settlements with established teams and governance. Hertfordshire Growth Board (HGB) wrote to Baroness Taylor of Stevenage on 19 August 2024 stating that they would like the opportunity to meet with Ministers and senior civil servants to discuss the potential for Hertfordshire to become a trailblazer for strategic planning. We support this approach and alongside HGB, we would welcome exploring options to deliver the government's growth and housebuilding agenda in Hertfordshire in ways that provide affordable, high quality and sustainable homes in the right locations.

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, Head of Planning at East Herts. Please contact either Cllr Newmark via email at cllr.jeremy.newmark@hertsmere.gov.uk or Sara Saunders at sara.saunders@eastherts.gov.uk

Yours sincerely

A handwritten signature in black ink that reads "Jeremy Newmark". The signature is written in a cursive style with a long horizontal flourish extending from the end of the name.

Cllr Jeremy Newmark

Leader of Hertsmere Borough Council

Chair of Hertfordshire Growth Board

Chair of Hertfordshire Infrastructure and Planning Partnership.