

Cottingham Neighbourhood Plan Steering Group - Monday 2nd September 2024

Present: Cllr Kevin (chair), Cllr Ros Jump, Cllr Alex Duke, Cllr D Longbottom, Geraldine Mathieson (note-taker), Doug Jennings & Katrin McClure

1. The group convened to discuss the consultation on changes to the National Planning Policy Framework and other changes to the planning system.
2. Members read through the consultation papers beforehand, and spent over 2 hours going through them together to agree on which questions were appropriate for comment. Some related to minor changes in wording, and many related to Green Belt. Other questions potentially affect the county as a whole in how the planning system is administered, or relate to other parts of the county, and the group felt it would be more appropriate for others to comment on these. It was noted that the biggest impact on Cottingham is likely to come from proposed changes to housing targets through use of a new standard formula. The basis for this formula is the existing number of dwellings, to promote house building at a similar rate to that of the last decade. Growth would be distributed through the county in accordance with demand.
3. The group recommended that the Parish Council submit the following responses to questions:

Question 3: Do you agree that we should reverse the December 2023 changes made on the urban uplift by deleting paragraph 62?

Yes, this makes sense in planning terms.

Question 6: Do you agree that the presumption in favour of sustainable development should be amended as proposed?

We are concerned about the balance of policies that may apply in situations where upwardly revised housing requirements render the allocations within a recently-made plan redundant. There is potential to rapidly change the character of areas without sufficient local consultation and unsupported by local facilities, infrastructure and open space requirements.

Question 7: Do you agree that all local planning authorities should be required to continually demonstrate 5 years of specific, deliverable sites for decision making purposes, regardless of plan status?

Yes, so long as the targets and period dates are appropriate to the area. We are conscious that developers scramble for permission prior to adoption of a new plan, such that the right amount of housing for an area is not evenly spread across the plan period. If several years-worth of housing is built in the first year, it is unfair on residents to impose more housing later in the plan period to meet the demands of developers rather than the capacity of communities and social infrastructure.

Question 15: Do you agree that Planning Practice Guidance should be amended to specify that the appropriate baseline for the standard method is housing stock rather than the latest household projections?

We can see sense in basing projections on current housing stock but have severe concerns about the ability of settlements to serve new residents adequately where a recent housing boom has already placed services under pressure, eg schools, medical facilities, highways, drains and public open spaces. It would be too easy for developers to push for more housing in popular places where sales are most profitable without consideration for long-term viability of the settlement and quality of life. Where extensive new housing is well beyond walking distance of existing

shops and other facilities, the historic centre (with narrow roads and insufficient parking) can decay as new residents drive elsewhere for their services.

Question 17: Do you agree that affordability is given an appropriate weighting within the proposed standard method?

Yes.

Question 18: Do you consider the standard method should factor in evidence on rental affordability? If so, do you have any suggestions for how this could be incorporated into the model?

Yes. Total monthly outlay is the key factor for residents, whether this is rent, mortgage or a shared-ownership combination.

Question 19: Do you have any additional comments on the proposed method for assessing housing needs?

Targets based on existing stock within a planning authority area can include places with little pressure to build permanent homes (eg. Withernsea) or where flood risk precludes further development (eg. Goole) and diverts this towards popular areas which may struggle from lack of infrastructure and facilities already under pressure through recent high development. Coastal areas specifically suffer from the challenges in recruiting medical and educational professionals when half their catchment area is in the sea.

Question 47: Do you agree with setting the expectation that local planning authorities should consider the particular needs of those who require Social Rent when undertaking needs assessments and setting policies on affordable housing requirements?

Yes

Question 48: Do you agree with removing the requirement to deliver 10% of housing on major sites as affordable home ownership?

Yes. Requirements should be in accordance with local need.

Question 49: Do you agree with removing the minimum 25% First Homes requirement?

Yes.

Question 51: Do you agree with introducing a policy to promote developments that have a mix of tenures and types?

Yes.

Question 56: Do you agree with these changes?

Yes, as this increases flexibility.

Question 58: Do you have views on why insufficient small sites are being allocated, and on ways in which the small site policy in the NPPF should be strengthened?

We welcome more small sites for local builders as these are normally of higher quality and builders are keen to maintain their good reputation and skilled workforce. We are aware that small rural settlements currently lacking in allocations could benefit from a percentage increase in housing stock to accommodate younger generations of the existing local population and so increase the sustainability of the village school, pub and/or shop.