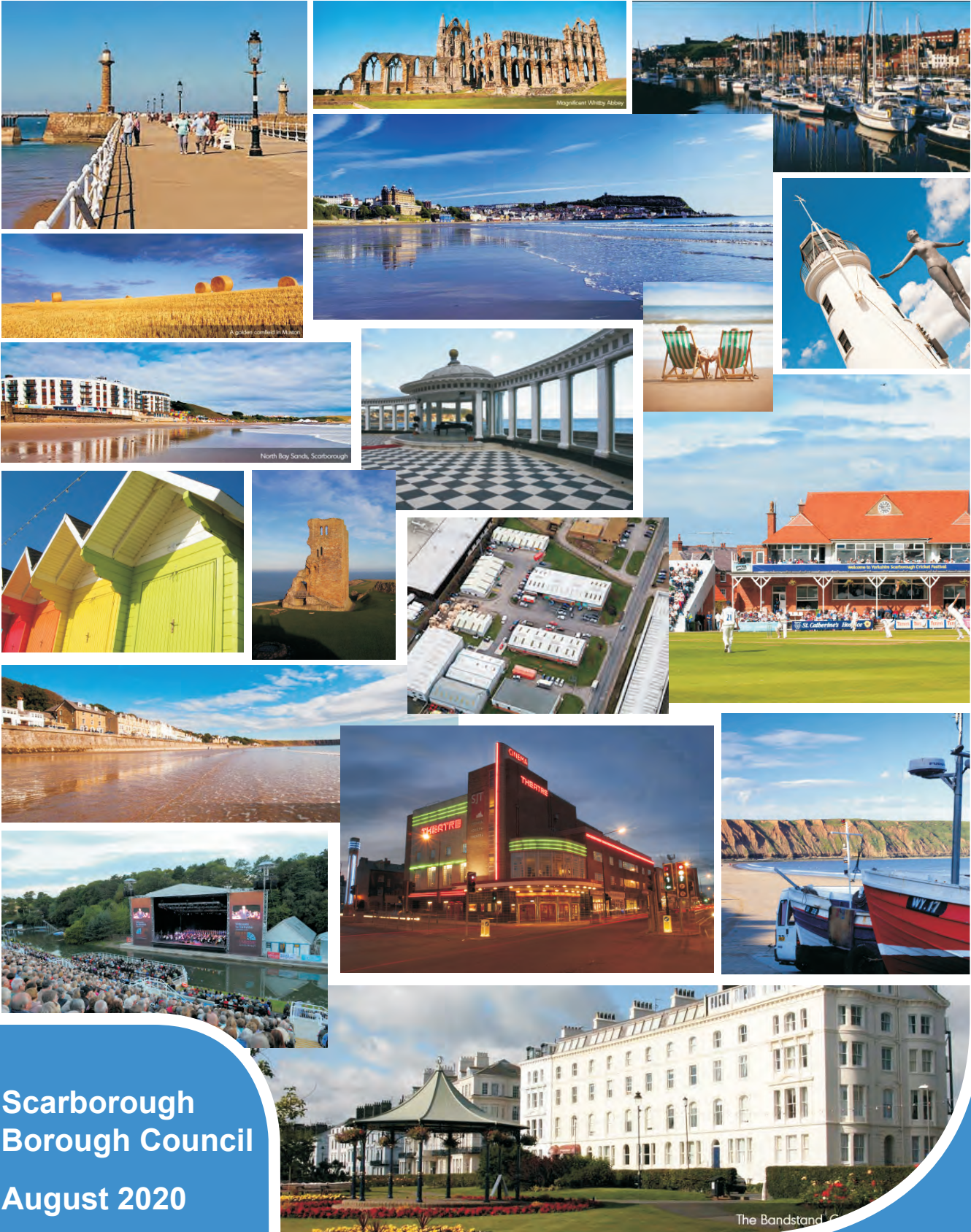


Scarborough Borough Local Plan Review

Issues & Options Consultation



A great place to live, work & play



Scarborough
Borough Council
August 2020

Contents

1	Planning Reform and Re-Organisation	3
2	Introduction	5
3	Why are we reviewing the Plan?	9
	National Planning Policy Framework and Guidance	9
	Local Plan Monitoring	10
	Council Policies and Priorities	10
	The 'Climate Emergency'	12
	Scope of the Review	13
4	Issues and Options	15
5	Housing	17
	Scale of Housing Development	17
	Supply of Sites / Housing Allocations	22
	Allocation of Smaller Sites	24
	Affordable Housing	25
	Housing Mix	28
	Increased Energy Efficiency Measures	30
	Optional Technical Standards	32
	Self-Build and Custom Housing	38
6	Climate Change and the Natural Environment	42
	Achieving a 'Net Gain' in Biodiversity	43
	Carbon 'Offsetting'	44
7	Design	46
8	Role of Town Centres	54
9	Economic Needs	57
10	Promoting Healthy Communities	61
11	Other Matters	64
12	Local Plan Viability	66
13	Allocation and Call for Sites	69
■	Appendices	
	Housing Site Methodology	72

Planning Reform and Re-Organisation 1

Planning Reform and Re-Organisation 1

1 Planning Reform and Re-Organisation

Reform and Re-Organisation

In recent weeks two factors have emerged that may have significant implications for the Local Plan review in the longer term. The Government has recently launched a consultation on what may be a fundamental restructure of the planning system. Further details can be obtained via <https://www.gov.uk/government/consultations/planning-for-the-future>. In addition, the Government is proposing to create unitary councils where there are currently different levels of authorities. North Yorkshire is one of those areas where the County Council provides some services and the district/borough councils provide others, and consequently proposals are being drawn up to inform the shape that unitary governance could take across the country

The above strands of activity are likely to have significant bearing on the nature and form of planning policy development in the area. Nonetheless the Borough Council considers that it is important to proceed with the 'issues and options' phase of consultation, which will provide an opportunity to gain an insight into aspirations and concerns of interested parties and stakeholders across the Borough, and provide an evidence base to help signpost and direct future policy development in whatever form both the planning system and local governance takes.

Introduction 2

2 Introduction

2.1 The Scarborough Borough Local Plan was adopted in July 2017 and replaced the former Local Plan of 1999. It covers the Borough excluding the National Park area and includes the towns of Scarborough, Whitby and Filey. The Plan sets out the long-term strategy for the Borough and provides the policies used in the consideration of all planning applications. The Plan also allocates sites for multiple uses including housing, employment, town centre uses and open space and recreation.



Picture 2.1 Whitby Abbey

2.2 The Local Plan is currently made up of two documents; the Scarborough Borough Local Plan 2011-32 and the Whitby Business Park Area Action Plan (WBPAAP). The latter of these is a joint plan with the North York Moors National Park Authority (NYMNP). The WBPAAP is not being considered through this review and will be considered separately and jointly with the NYMNP.

2 Introduction

2.3 This "Issues and Options" document is the first stage in reviewing and updating the current Local Plan. This document will set out why the review is needed, identify any issues requiring investigation and set out the available options to address them. At this time there will also be a 'call for sites' to assist in the consideration of remaining and proposed housing and other forms of allocation.

2.4 Following the consideration of comments, the preparation of further evidence work and engagement with statutory stakeholders, the next stage will be to prepare a "Draft" Local Plan. This will again be subject to substantive consultation, following which the plan will be submitted to the Planning Inspectorate (PINS) for examination. The current timetable is for the Issues and Options consultation (this consultation) to take place in mid-2020, consultation on the Draft Local Plan in 2021 and finally the submission of the Local Plan to PINS in late 2022.

2.5 The full timetable for the review of the Local Plan and the development of other supporting documents is set out in the [Local Development Scheme](#).

2.6 A Sustainability Appraisal Scoping Report has also been prepared to set out how the emerging Local Plan will be considered against proposed sustainability objectives. This is being consulted upon concurrently with this document and any comments / alterations will assist in assessing future iterations of the plan at the draft and submission stages.

2.7 A Housing Assessment Methodology has also been prepared which can be viewed in the Appendices 'Housing Site Methodology'

Information on How to Comment

The simplest way to respond is to submit your comments online by using the Local Plan portal. This can be accessed at the [Consultation Portal](#).

Alternatively you can download a response form at the [Current Consultation section](#) . Please return your completed forms, emails or letters to:

Email: localplan@scarborough.gov.uk

Post: Scarborough Borough Council, Planning Policy & Conservation, Town Hall, St Nicholas Street, Scarborough, YO11 2HG

If you would like to speak to an officer please contact us on 01723 232480.

Please include your contact details in your response so that we can log your comments and keep you abreast of the latest Local Plan updates. If you do not wish to receive further updates then please notify us of that. Any details received will be retained and used in accordance with our [Privacy Notice](#). Anonymous replies will not be accepted.

All responses must be received by 5pm on 6 November 2020. Late responses may not be accepted and would be at the discretion of the Local Planning Authority.

Consultation during Covid-19

The document is being released in unprecedented times across the world. The implications of the pandemic and its after effects will have many impacts on all of our lives, many of which are as yet unknown. The Local Plan process is no exception and the current restrictions will make the process of consultation somewhat different to previous occasions.

This is, however, very early days in the production of the Local Plan review and does not form a statutory stage for consultation. Notwithstanding this we want to ensure that as many people as possible have the opportunity to become engaged in the plan process now and throughout its production. Due to the current restrictions we have to work under in respect of social distancing we will be unable to hold any Local Plan exhibitions or drop-in events on this occasion although when restrictions are lifted we will consider re-introducing them for future events.

What we will do:

- Documents will be published on the Council's website;
- Contact all persons on the Local Plan consultee database;
- Issue press releases;
- Use social media (both the Local Planning Authority and Borough Council accounts) including Facebook and Twitter ⁽¹⁾ to provide links and updates;
- In lieu of face to face meetings and exhibitions, interested parties will be able to request phone or video conference discussions with planning officers. This includes Town and Parish Councils who can, themselves or as a group, request discussions with officers by phone, Zoom, Teams or Skype (or other means by request). This can be requested by using the contact details above;
- Investigate carrying out webinars / online events when we can talk through a presentation on all or specific parts of the document. If this is practical we will also investigate uploading these to an online portal such as YouTube;
- Extend the usual period of consultation from 6 weeks to 10 weeks.

What we will be unable to do:

- The holding of exhibitions and drop-in sessions at locations across the Borough;
- Depositing documents at Council Offices and Libraries - however we will endeavour to provide paper documents on request and where reasonable (printing and postage costs may apply).

Why are we reviewing the Plan? 3

Why are we reviewing the Plan? 3

3 Why are we reviewing the Plan?

3.1 Whilst we are only three years in to the lifespan of the Scarborough Borough Local Plan (adopted July 2017), significant changes to Government policy first published in July 2018 introduced a formal requirement for Local Plans to be reviewed - to assess whether they need updating - at least once every five years. Plans should then be updated as necessary. In considering whether a plan needs to be updated, consideration should be given to, amongst other things, the changing circumstances affecting the area and any changes in national policy.

3.2 As detailed below, a number of changes have been made to both the National Planning Policy Framework (NPPF) and the supporting Planning Practice Guide (PPG) since the adoption of the Local Plan. Notably, these include a change in the way the housing need is calculated and the introduction of the 'Housing Delivery Test', both of which have potentially significant implications for the way we plan for housing growth at the local level.

3.3 Furthermore, the elevation of the 'Climate Change' and broader 'sustainability' agendas within the public mindset highlights a need to revisit these aspects of planning policy; to investigate how far the Local Plan can reasonably go to contribute towards meeting national and global targets.

3.4 Consideration has also been given to the information gathered from monitoring the success or failure of the adopted policies and site allocations, as set out in the annually produced [Authority Monitoring Report](#). Significantly, allocated sites that appear to have stalled and are showing no signs of coming forward will be re-assessed as part of the plan review process.

3.5 In light of these issues, the Borough Council resolved in July 2019 to review and update the Scarborough Borough Local Plan.

National Planning Policy Framework and Guidance

3.6 Since the adoption of the Local Plan there have been two updates to the National Planning Policy Framework (NPPF); firstly in July 2018 and then again in February 2019. These updates have been supplemented by substantial updates to the Government's online Planning Practice Guidance (PPG).

3.7 The impact of these amendments and new additions on the Local Plan need to be considered. Whilst not an exhaustive list, the following are some of the major changes to national policy and guidance that need to be considered within this review;

- The need to distinguish between 'Strategic' and 'Non-Strategic' policies;
- Introduction of the 'Standard Method' or calculating local housing needs (this supersedes the previous locally-derived method);
- Implementation of the 'Housing Delivery Test';
- The need for 'small sites' (1ha or under in area) to accommodate 10% of the local housing requirement;
- The increased emphasis on securing high-quality design;

3 Why are we reviewing the Plan?

- Recognition that retail is adapting and changing and that town centres should diversify; and
- The 'front loading' of viability assessments (land owners / developers to provide viability evidence as part of the plan-making process).

3.8 Further updates are expected later in 2020 and any subsequent updates will need to be considered through the review of the Local Plan.

Local Plan Monitoring

3.9 The Local Plan has been consistently monitored since its adoption in July 2017. The findings of the ongoing monitoring are published annually within the Council's [Authority Monitoring Report](#) (AMR). The AMR uses the monitoring indicators that were presented within the Local Plan for the basis of assessing the effectiveness of Local Plan policies. The AMR iterations published to date have not found any major issues with the adopted Local Plan policies, nor do they indicate that policies have failed to deliver.

3.10 Significantly, housing delivery has exceeded the adopted Local Plan target for each of the past four years. Progress has also been made on a majority of Local Plan housing allocations, with only a very small number having made little or no progress to date (a pre-application submission or other contact with planning officers). The AMR also presents the level of delivery of other uses such as employment land, tourism accommodation and retail. Any key emerging AMR findings will be discussed within the relevant sections of this document.

3.11 Outside of the AMR process, regular use of the adopted plan by Officers has revealed a small number of minor policy wording issues that need to be addressed in the plan review. These minor changes to wording will not be set out fully in this "Issues and Options" document, rather a list of policies requiring such alterations will be required at the "Draft" Local Plan stage (the next stage in plan production).

Council Policies and Priorities

3.12 Scarborough Borough Council has recently launched its "Building a Better Borough" programme, to provide a new framework and overall context for the way the Council works and delivers its services. The programme will, amongst other things, feed into the production of a new Corporate Plan, which will in turn guide the core work and structure of the Council as it seeks to deliver upon the needs and aspirations of the local community.

Why are we reviewing the Plan? 3



Picture 3.1 Scarborough Castle from Scalby Mills

3.13 Comprehensive community engagement and consultation - entitled "Your Borough, Your Say" - played a key role in shaping this new Council framework. This engagement exercise was focussed around ten themes, and asked for feedback on particular issues from residents, businesses, community groups, stakeholders and key partners. The ten themes are as follows:

- Vibrant town centres;
- A premier visitor destination;
- Happy, healthy people;
- A good quality home for all;
- A clean, green and attractive environment;
- Economic growth that benefits everyone;
- A vibrant culture and heritage offer;
- Thriving and engaged communities;
- A well connected place;
- A borough where we all feel safe.

3 Why are we reviewing the Plan?

3.14 It is important to note that these are all issues which can be directly or indirectly influenced by the planning system, both in terms of proactive plan making and reactive decision-making. With regard to the former, the outcomes of the "Your Borough, Your Say" consultation will provide a useful steer for the plan review insofar as the identify priorities can help to shape the scope and nature of emerging planning policy.

The 'Climate Emergency'



Picture 3.2 Climate Change Demonstrations (Source: Pixabay)

3.15 Significantly, Scarborough Borough Council was one of many local authorities across the country to declare a 'Climate Emergency' in 2019. The Borough Council's declaration is in effect a pledge that it will do everything in its power to make the Borough 'carbon neutral' - to achieve 'net zero' carbon emissions ⁽²⁾ - by 2030. Whilst the nature of this challenge is such that a wide range of significant cross-cutting interventions are required, many of which go well beyond the scope of the planning system, planning has an important and active role to play in meeting these ambitious targets.

3.16 To be clear, this is not a new challenge for the planning system - 'sustainable development' is embedded at the heart of the process - but the push to deliver a significant reduction in carbon emissions over a relatively short timescale places additional emphasis on environmental considerations. Nevertheless, it is important to recognise that the fundamental principles of policy development remain the same.

2 'Net zero' is achieved by balancing carbon emissions (X) with carbon removal ('offsetting')(Y) - so that X-Y=0 (zero)

Why are we reviewing the Plan? 3

3.17 A key part of achieving the 'net zero' carbon emissions will be the delivery of carbon 'offsetting' (capture) measures. These can be delivered at both micro and macro scales. At street (micro) level, our places should be well-landscaped, including through the provision of street trees. At the strategic (macro) level, the co-ordinated delivery of new woodland areas, meadows and other types of 'carbon sinks' can play a significant role in 'offsetting' carbon emissions.

3.18 This review process will consider the various ways through which the Local Plan can help address the 'Climate Emergency' we are facing.

Scope of the Review

3.19 Whilst there are clearly a number of issues to be considered through the Local Plan review process, it is anticipated that there will be a 'partial' review insofar as the majority of policies within the adopted (2017) Local Plan are likely to remain unchanged or will require only minor amendments. Those areas requiring more substantive changes will be where significant changes have arisen in national policy or other priorities have been identified. As detailed above, these will likely focus on housing issues and those around the 'Climate Change' agenda.

3.20 Ultimately the full scope of the review will be set out following the consultation exercise, dependent on the nature of responses received and subject to any further national policy changes implemented prior to the publication of the Draft Local Plan.

Issues and Options 4

4 Issues and Options

4.1 This section outlines the issues requiring attention within the Local Plan review. Where relevant, it also provides questions / options, which will be used to shape the policy response to the identified issues. The presented options are considered to be realistic, taking account of existing evidence and the parameters set by the NPPF and PPG. As set out below, two overarching issues to consider at this stage are the length of the emerging plan and plan viability / deliverability.

Plan Review Period

4.2 In terms of the timeframe of the emerging plan, the NPPF is clear that strategic policies should look ahead over a minimum 15 year period from adoption. As per the production timetable set out within the Council's Local Development Scheme, it is hoped that a revised Local Plan would be adopted in 2023/24. Therefore the plan period is to be extended to 2038. This would extend the current plan period by a further six years and forms the basis for a number of the options that follow; it is particularly important when setting housing targets.

Local Plan Viability

4.3 Local Plans should be deliverable. They should have regard to the financial implications of policy requirements and should provide sufficient flexibility to ensure that development remains viable over the plan period. To ensure viability and thus enable delivery, the cumulative costs of any policy requirements should, when taken with the normal cost of development (e.g. typical construction costs, professional fees, etc) and mitigation (measures which the development could not proceed without), provide competitive returns to a willing land owner and willing developer⁽³⁾. Fundamentally, the policy requirements of a plan should not constrain the viability of the development to the extent that it compromises delivery.

4.4 The Local Plan review will explore a number of issues and policy options, many of which go beyond the scope of the existing (2017) Local Plan. While this plan review provides an opportunity to require more of developers / more from development, it is important to note that once normal costs of development and mitigation have been accounted for, there is a finite pot of money left over for local policy requirements. As such, within the context of viability, there is a limit on what policy requirements can ultimately be implemented through the plan.

4.5 The concept of viability is a key thread that runs through this document and is brought together in Section 12 'Local Plan Viability' where we have asked people to identify their personal policy priorities. The priorities identified through this process will help the Council to make the difficult decisions around what should be expected of new development. These decisions will be further supported by a full viability assessment of the Local Plan. The initial findings of this work will be published at the Draft Local Plan stage.

3 Government guidance indicates that a developers are entitled to a profit margin of between 15% and 20%

Housing 5

5 Housing

5.1 The delivery of housing remains important across the country, however, this should not be seen as a simple numbers issue. Whilst there is an ambition nationally to deliver more housing with annual figures of 300,000 often touted the 'housing agenda' is much wider than that. This Issues and Options paper looks into housing targets, but also highlights the importance of affordability, size, tenure type, accessibility and the efficiency of construction. This is by no means an exhaustive list and any other housing related matters not referred to in this paper should be raised in any response you may wish to make.



Picture 5.1 Recent Housing Development in Scalby

Scale of Housing Development

Current Housing Position

5.2 Prior to setting out options for housing it is important to understand the current position with reference to housing and delivery. The current Local Plan set a target of 450 dwellings per annum and although the plan was not adopted until July 2017 the actual requirement ran from 2011 (April). As of the end of the reporting year 2019/20 there was an under-delivery of 734 dwellings. This was largely a result of the prolonged recovery from the previous recession, however, delivery has now turned a corner and the target has been met and surpassed in each

5 Housing

of the previous 4 years, reducing the overall level of under-delivery year on year. However, as this review is under preparation the Covid-19 pandemic has had a devastating effect on the country and it is not clear at this stage what the repercussions will be for the delivery of housing, though it appears very likely from early indications that delivery will be impacted in the 2020/21 reporting period. Little or no housing delivery has been witnessed in the Borough from mid-March through to June and the restarting of the housing industry will have to cope with social distancing restrictions and a likely slowdown in completions due to the limits on trade people on site at any one time.

Previous Under-Delivery

5.3 The issue of under-delivery has been considered in light of the guidance in the NPPG on the standard methodology. This states the following:

"The affordability adjustment is applied (to the standard method [SBC emphasis]) to take account of past under-delivery. The standard method identifies the minimum uplift that will be required and therefore it is not a requirement to specifically address under-delivery. Where an alternative approach to the standard method is used, past under delivery should be taken into account."

5.4 The current Local Plan will be classed as 'out of date' in July 2022 and the housing requirement as assessed under the Housing Delivery Test will revert to that calculated using the standard method; currently circa 175 dwellings per annum. The review of the Local Plan is not scheduled to be completed by that date with the revised plan most likely to be adopted in late 2023 or 2024 (as set out in the Local Development Scheme). As such any under delivery will be 'wiped clean' as of July 2022. There will be a requirement to factor in under delivery but only that which occurs after July 2022, through to adoption of the plan, and based on the delivery performance against the standard methodology which is currently circa 175 dwellings per annum.

Future Housing and Options

5.5 Housing remains a priority of Government whose ambition is the delivery of 300,000 new homes per year. However, since the adoption of the Local Plan in 2017 the Government's policy stance on how housing delivery targets should be determined at the local level has changed. Previously, it was the sole responsibility of the Local Planning Authority to establish the level of housing need for their area by undertaking an "Objective Assessment of Need" (OAN), taking into account past delivery rates, economic growth forecasts and other factors that can impact on housing need and demand. Such assessments were often subject to significant objections from two factions; those who suggested the OAN was too high, and, those who proposed a higher figure and therefore argued for more housing site allocations and this often led to delays in the Local Plan process.

5.6 With the above in mind, the Government proposed to speed up the Local Plan process and set down certain parameters in respect of determining housing numbers. Through the NPPF review in July 2018, the Government introduced a "standard method" for calculating housing need ⁽⁴⁾ This is based on a formula set out by Government and is subject to change as it is based on Population and Housing projections, which are generally updated and released every two years.

4 Information on the standard method can be found at <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>.

Housing 5

5.7 The figures that have been released by Government to date have suggested the standard method could result in a circa 60% reduction in the level of housing that should be provided in Scarborough Borough. The current Local Plan target is 450 dwellings per annum and the standard method currently proposes a figure of around 175 dwellings, although this is now suggested as being the starting point.

5.8 It is the intention of the Borough Council to consider the Local Plan housing requirement in light of the standard method and base any change on it. Doing so is an accepted method of determining housing need and should be accepted through the Examination process. A number of options are proposed for consideration. The figure used for the standard method is based on the current figure published by Government, however, this could change over the production period of the Local Plan although any change is unlikely to be significant.

5.9 Option 1 is adoption of the local housing need figure which has been set through the latest standard method. This would meet the requirements of the NPPF and address housing need in full as determined under the Government's standard method. As stated previously this would result in a housing need figure of around 175 dwellings per annum.

5.10 It should be noted that the current standard method does not fully support the national target of 300,000 homes per annum and further changes may be made. Any alteration to the standard method could have an upward impact on the figure attributed to Scarborough Borough. This option is therefore more about the actual use if the standard method and not necessarily the current figure of 175 dwellings per annum.

5.11 Option 2 would see the setting of a target based on a long term average of delivery rates in the plan area. An assessment of the previous 15 years of housing delivery (table below) which smooths out years of recession and growth results in a figure of circa 350 dwellings per annum. In that respect a ballpark figure of 350 dwellings per annum would appear a logical option and is based on actual performance in the market over prolonged period. This represents a doubling of the figure currently set under the standard method.

Year (Apr - Mar)	05/06	06/07	07/08	08/09	09/10	10/11	11/12	12/13	13/14
Net Comps	410	603	284	196	211	236	268	159	240

Table 5.1 Housing Delivery 2004-2014

Year (Apr - Mar)	14/15	15/16	16/17	17/18	18/19	19/20	Total Completions	Net Annual Completions
Net Comps	416	352	457	458	469	497	5256	350

Table 5.2 Housing Delivery 2014-2020

5.12 Option 3 would see an uplift on the standard method. This would be based on an assessment of additional factors including population, migration trends, other matters that impact on population (e.g. second homes and empty homes) and economic projections. To determine this figure further work is required to determine the likely level of economic growth (and job

5 Housing

creation) over the plan period so an exact figure cannot be provided at this time, although most likely would be an increase over the standard method figure and previously resulted in a target of 450 dwellings per annum (through the previous Local Plan). This Option would likely allow an increase in the delivery of affordable housing above what would be deliverable if the standard method was adopted.

5.13 Option 4 would see a target based on fully delivering sufficient housing to deliver the identified affordable housing need. This figure cannot be 100% accurate at this stage as the revised Strategic Housing Market Assessment (SHMA) will be completed late 2020 / early 2021. This will provide an up to date figure, however to provide the reader with an estimate of the likely target the need figures from the previous SHMA 2015 have been used (see below). This results in an annual housing target in the region of 1588.

- The previous SHMA estimated a requirement of 526 dwellings per annum for the period 2015/20. Beyond that emerging need was proposed to be 315 dwellings per annum. So for the purposes of this we can extend the period to 2038 retaining the 315 per annum requirement resulting in an overall requirement from 2015 to 2038 of 8300 affordable dwellings.
- In the years 2015 to 2020, 435 affordable dwellings were delivered through planning (further units have been delivered through other direct measures which have equated to a further 135 units [*figure provided by SBC Housing Team] - and circa 434 currently have planning consent (full or outline) and are under construction or yet to be started.
- Therefore there is a remaining need for $(8300 - 435 - 135 - 434) = 7296$ dwellings over the period to 2038. This equates to 405 dwellings per annum.
- The average delivery of affordable housing from 2015 up to the end of March 2020 has been 25.5% across all sites including additional affordable provision from other sources. Therefore, if this rate of delivery was to continue, to fully deliver the affordable housing need set out above would require the delivery of circa 28,584 dwellings at a rate of 1588 dwellings per annum (this is based from 2020 to 2038).

5.14 Depending on the option taken forward this will affect the level of housing required to be found either in extant planning consents or in allocations (existing and/or new). It should be emphasised at this point that depending on the housing figure there may be no actual requirement to identify or allocate new sites. Notwithstanding this there may be a need to identify smaller sites in accordance with the Government guidance that 10% of housing sites should be on small and medium sized sites (defined as being no larger than 1 hectare).

5.15 Once the housing number has been established the starting point will be to assess the deliverability of existing Local Plan allocations, then to identify any 'gap' in numbers (chosen option v existing supply) and finally fill any gap with new and/or replacement sites. The only addition to this will be as stated above with the allocation of 'smaller' sites (under 1 ha). We are therefore not starting from scratch - we are looking to 'supplement' existing allocations (if required) and re-consider existing allocations (in the context of deliverability only).

5.16 On the basis of the plan running from July 2022 when any remaining backlog is eliminated (the date the current plan becomes out of date; ie 5 years old) to March 2038 this would require sites being identified for a 16 year period to accommodate in the region of:

Housing 5

- Option 1 - 2800 dwellings;
- Option 2 - 5600 dwellings;
- Option 3 - 7200 (or as amended by updated economic evidence); and
- Option 4 - 25,408 (or as amended by the updated SHMA).

Question 1**Housing Target Options**

Of the options put forward above for housing requirement which is your favoured option to be taken forward through the Local Plan review? If possible please explain your reasons.

Option 1**Housing Requirement Option 1**

Use the Standard method to identify the housing requirement for Scarborough Borough (currently circa 175 dwellings per annum)

Option 2**Housing Requirement Option 2**

Use the Standard Method as a base figure and apply and uplift of (100%) based on average delivery rate of housing for the past 15 years and adopt an annual requirement of 350 dwellings.

Option 3**Housing Requirement Option 3**

Use the Standard Method as a base figure and apply an uplift to take into account population trends, migration, economic projections and other matters such as second home ownership and empty homes. Based on the previous Local Plan this would equate to a requirement of 450 dwellings per annum but would have to be re-based on up to date evidence.

5 Housing

Option 4

Housing Requirement Option 4

Adopt a figure that would theoretically allow the delivery of the full affordable housing need figure. Based on the previous SHMA this would be in the region of 1655 dwellings per annum but this would have to be re-based on up to date evidence once the updated SHMA has been published.



Picture 5.2 New Housing at Filey, Eastfield (Middle Deepdale) and Cloughton

Supply of Sites / Housing Allocations

5.17 Depending on the option taken forward this will affect the level of housing required to be found either in extant planning consents, the brownfield register or in allocations (existing and/or new). As such, a review of Local Plan allocations is to be undertaken. This involves an assessment of all existing allocations that are yet to be completed or make any substantial

Housing 5

progress in order to establish likely timescales for delivery, or, if no progress has been made, attempt to understand why this has been the case and whether the site may come forward within the Local Plan period. An important aspect of this will be to work with the development industry to identify any barriers to delivery. Promoters of those allocations that have not yet come forward will be invited to provide evidence outlining the likelihood the site will come forward.

5.18 Notwithstanding the above, a number of allocated sites have contributed large numbers of housing delivery in recent years. Therefore, and as previously mentioned, dependent on the level housing required, the Local Plan will look at allocating additional sites. The starting point for ensuring a sufficient supply of housing will be to assess the deliverability of existing Local Plan allocations, then to identify any gap or shortfall in numbers (dependent on the chosen option for housing) and finally to fill any such gap with new and/or replacement sites. An aspect of this will be to consider any distribution trends with those existing allocations, for example this might include identifying any settlement where allocations have been brought forward at a quicker rate than others.

5.19 One specific issue the Council is considering reviewing is its approach towards the the delivery of sites that are in multiple ownership. There have been issues arising with some sites allocated in the Local Plan that are in multiple ownership. The Council is therefore considering whether it might introduce a policy that requires 'equalisation', or one that sets out clearly that any sites in multiple ownership, if submitted individually, must consider the wider allocation in terms of the provision of infrastructure, or access for example. Additionally, where any contributions are required, they would be calculated on a pro-rata basis to ensure contributions are not compromised by a site coming forward incrementally. In relation to the call for sites, it is crucial any such ownership issues are presented at this stage and any implications for delivery are fully established. Any signed agreements or memorandums of understanding between landowners should be outlined at this stage and will weigh in favour of sites over those without such an agreement.

Call for Sites

As part of this consultation exercise, the Council is undertaking a 'call for sites' by inviting submissions of sites to be considered for housing allocation throughout the Local Plan period. A 'call for sites' form has been prepared and is available to use and complete online on the [Consultation Portal](#), downloadable at the [Planning Consultations Homepage](#) or can be sent out on request. The form should be completed as extensively as possible for consideration. Particularly important will be to establish whether sites will be deliverable within 5 years, or within the later phases of the plan period. Therefore, the input of site promoters will be important in providing evidence on potential constraints to delivery, any mitigation measures and implications on viability. More information on the 'call for sites' can be found at Section 13 'Allocation and Call for Sites'

5 Housing

5.20 Additionally, the Council has prepared a revised methodology to be used in the assessment of potential site allocations. A previous methodology had been established as part of the previous Local Plan preparation and this largely forms the basis for the revised iteration. The revised methodology can be found in 'Housing Site Methodology'. The Council are also inviting comments on the methodology.

Question 2

Housing Site Assessment Methodology

The Housing Site Assessment Methodology sets out clearly and comprehensively how we propose to assess all sites for allocation. Taking into account the content of the methodology:

- Do you agree or disagree that the methodology is an appropriate means for assessing housing sites?
- Do you agree with the selected criteria? If not please state which ones and your reasons.
- Are there additional criteria that should be used? Please explain your reasons.

Allocation of Smaller Sites

5.21 The July 2018 revision to the NPPF introduced a requirement for planning authorities to meet at least 10% of their housing requirement on sites no larger than 1 hectare, unless there are strong reasons why that target cannot be achieved. By comparison, the 2017 Scarborough Borough Local Plan allocated only 6 sites under 1 hectare in size. These sites have an estimated (combined) yield of 170 units, which equates to 1.8% of the plan's total housing requirement (9450).

5.22 Moving forward, there is clearly a need to allocate more 'small' sites through the plan review process or to identify them within the Council's brownfield register. As part of the process, the threshold for allocation will be set at a minimum yield of 5 dwellings. This is lower than the 2017 threshold of 10 dwellings and thus, should provide greater flexibility when seeking to identify appropriate 'small' sites. Similarly, where the 2017 Local Plan only allocated sites in the Borough's towns and 'Service Villages', we may also look to allocate sites in smaller 'Rural Villages' through the plan review.

5.23 Ultimately, we do not intend to force the 10% requirement if there is an insufficient supply of appropriate sites, but we will explore all potential options and welcome the submission of sites under 1 hectare in size by landowners. As a guide, we will be looking for sites that are either within, or well-related (directly adjacent) to, existing settlements. Sites that are isolated from existing settlements will generally not be supported.

Question 3

Allocation of Smaller Sites

In terms of attempting to achieve the delivery of 10% of housing on small sites do you have any response to make on the following. What approach towards the allocation of smaller sites should be taken?

- Allocate sites based on the availability and suitability of sites, regardless of location;
- Allocate in accordance with the established distribution in the 2017 Local Plan; or
- Distribute evenly across settlements.

Affordable Housing

5.24 Affordability of housing remains a critical issue in many areas across the country and this Borough is not different. The delivery of affordable homes is a key priority of the Borough Council and this is becoming very difficult with the increasing demands on planning applications to address an ever increasing range of matters including climate change, biodiversity, educational requirements and so on. Each of these has an impact on the financial aspects of a scheme and in turn viability. Viability is a matter covered throughout this report.

5.25 Affordable housing is housing that meets the needs of people who either cannot afford to buy, or choose not to buy property. It can take many forms and includes the following (definitions included):

- Rent (Social and Affordable) - This form of housing meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents ⁽⁵⁾ (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing to rent is expected to be the normal form of affordable provision (and, in this context, is known as Affordable Private Rent).
- Intermediate Housing - This is housing provided for sale that provides a route to ownership for those who cannot achieve home ownership through the market. It includes shared ownership, relevant equity loans and rent to buy;
- Discount for Sale - This is housing that is sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households. The current discounts within the Borough are as follows:

5 Housing

- i. Whitby, North and Western Parishes 45%;
 - ii. Scarborough Urban 40%; and
 - iii. Filey and Southern Parishes 40%.
- First Homes - This is a new proposal by Government which is currently passing through consultation before being brought in most likely later in 2020. It is a similar product to Discount for Sale housing with a proposed discount of 30% (subject to finalisation) for local persons and generally first time buyers. This may also include key workers. The discount would be set in perpetuity and any future sales would have to include this discount.



Picture 5.3 Affordable Homes Construction (Credit: Beyond Housing)

5.26 Local affordable housing needs are identified through the SHMA. The SHMA was last prepared in 2015 and is in the process of being updated. This sets out the numerical need for housing over the immediate period of 5 years and projects later developing need. For context the existing SHMA set out need to be as follows:

Housing 5

- Existing unmet need of 526 dwellings per annum for the period 2015/20;
- Emerging need of 315 dwellings per annum from 2020 onward.

5.27 This level of housing need shows how difficult it is to tackle affordability as housing delivery for both market and affordable homes averaged around 450 units a year over the past 4 or 5 years. Clearly this means that the affordable housing deficit will not be eliminated but does not mean we should not attempt to address these needs to the best of our ability.

5.28 In the previous 5 years 570 affordable homes have been delivered which equates to 114 dwellings per annum. This equated to circa 22% of the need as identified in the SHMA. Furthermore there are a further 434 affordable homes with an extant permission some of which are currently under construction.

5.29 Affordable housing delivery is a priority for the Council but additional pressures on new developments will require the delivery percentages to be revisited (current percentage requirements are shown below). Should affordable housing delivery secured through the planning process take a hit as a consequence of the competing statutory demands on housing there may be other forms of delivery to be explored that could address need and 'fill the gap' to some extent. These are outside the control of the Local Planning Authority and a matter for the Council as a corporate entity and landowner.

No of Dwellings	Housing Market Areas		
	Scarborough ⁽¹⁾	Filey, Hunmanby and Southern ⁽²⁾	Whitby, Northern and Western Parishes ⁽³⁾
10 or more	10%	15%	30%

Table 5.3 Affordable Housing Requirements by Area

1. Consists of the Town area (Wards of North Bay, Northstead, Woodlands, Stepney, Falsgrave Park, Central, Castle, Ramshill and Weaponess) and the Parish of Eastfield.
2. Parishes Consists of Filey, Hunmanby, Cayton, Seamer, Irton, Muston, Gristhorpe, Leubberston, Reighton, Speeton and Osgodby.
3. Consists of Whitby, Eskdaleside, Sandsend, Ruswarp, Newby, Scalby, Burniston, Cloughton, East Ayton, West Ayton, Brompton, Sawdon, Wykeham, Ruston and Snainton.

Affordable Tenure Mix

5.30 Paragraph 64 of the NPPF states that 10% of the homes to be delivered on a site should be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups.

5.31 To this end, and as set out in the Council's up to date Affordable Housing SPD (October 2019), the tenure mix requirements established within Policy HC3 of the 2017 Local Plan (70% of affordable units to be rented) are still considered to be relevant. For the avoidance of doubt, shifting the tenure mix towards the NPPF requirement would significantly prejudice the ability to meet identified needs, particularly in the "Scarborough" and "Filey, Hunmanby and Southern Parishes" Housing Market Areas (HMA), where the overall affordable housing requirement is currently set at 10% and 15% respectively. In the "Whitby, Northern and Western parishes" HMA, the 10% affordable ownership model can be met through the existing Local Plan policy approach owing to the higher overall requirement (30%).

5 Housing

5.32 To deliver 10% affordable home ownership in Scarborough would mean no new provision of social or affordable rented property which is not considered an appropriate or acceptable policy.

Question 4

Affordable Housing

What type of tenure (see Para 4.24 for definitions) is considered most important to provide in your local area:

- Rented (social or affordable);
- Intermediate (such as shared equity where you purchase part of the property and rent the remainder);
- Affordable Purchase (such as Discount for Sale or First Homes)

Please state the area you are referring to (e.g. Scarborough, Whitby, Filey, etc)

5.33 The delivery of affordable housing provision in general when considering other demands on new housing development is covered under Section 12 'Local Plan Viability'

Housing Mix

5.34 The NPPF is clear that the housing needs - in terms of size, type and tenure requirements - of different types of groups in the community should be assessed and reflected in planning policy. These needs are typically identified through the undertaking of a SHMA. Indeed the Council's 2015 SHMA informed the production of the existing/adopted Local Plan. While the Council is in the process of updating the SHMA, it is important to note how recent delivery compares to the needs identified within the 2015 SHMA. This delivery record together with the needs data will help define the scope of new and/or revised policies within the Local Plan review.

5.35 Unless stated otherwise, the data presented below is an average of the past five annual monitoring periods, as presented within the Council's Authority Monitoring Report and collated from other data sources.

Type of Housing

5.36 The Council's 2015 SHMA shows a difference in the needs / aspirations of those seeking affordable housing compared with those seeking to move within the open market. For example, as demonstrated in the table below, a greater percentage of those in need of affordable housing expressed a preference for a flat (36%) when compared to their open market counterparts (15%). The table below also shows that anticipated needs are not being met on the ground, with the delivery 'gap' being particularly prevalent with bungalows.

Housing 5

House Type	Affordable Preference	Open Market Preference	5 Year Delivery
House (2+ storeys)	42%	60%	61%
Bungalow (single storey)	22%	22%	3%
Flat	36%	15%	36%

Table 5.4 Housing Type (Need v Delivery)

5.37 Looking at affordable delivery in greater detail (see table below) also reveals a noticeable under-supply of flats. Indeed, while 761 flats have been delivered over the past five years, only 24% of those units have been affordable. With this in mind, appropriate policy responses to facilitate increased delivery of affordable flats should perhaps be explored.

House Type	Affordable Preference	5 Year Delivery	
		Total	Percentage
House + Bungalow	64%	329	76%
Flat	36%	106	24%

Table 5.5 Affordable Housing Type (Need v Delivery)

5.38 Across all house types and tenures there has been a relative balance in the delivery of detached, semi-detached and terraced units. Comparing this aspect of delivery against the preferences expressed within the 2015 SHMA is difficult, as while more people aspire to own a detached property, more expect to purchase a semi-detached property. As such, when taken on face value, it is fair to say that the market is meeting expectations in this respect.

Size of Housing

5.39 Over the past 5 years approximately 37% of all homes delivered in the Borough have been 2 bedroom units, with 30% being 3 bedroom units. The percentages are skewed slightly by the figures for the delivery of flats, as 3 bedroom homes are the most delivered houses/bungalows (46%).

5.40 In terms of the size of 'open market' housing (not including flats), delivery has broadly matched aspiration over the last 5 years; 24% of people looking to move would like a 1-2 bed house, 46% would like a 3 bed house and 30% would like a 4+ bed house, while delivery of these house sizes has been 24%, 48% and 26% respectively.

5.41 The Council's 2015 SHMA revealed a difference in the needs / aspirations of those seeking affordable housing compared with those seeking to move within the open market. Indeed, 1 to 2 bed units were strongly favoured for affordable housing; 84% preferred a smaller unit, with 42% seeking a house, 36% seeking a flat and 22% seeking a bungalow. Given that approximately 68% of affordable units delivered in the last 5 years were these smaller units, there is a noticeable difference between demand and supply.

5 Housing

Question 5

Housing Mix

House Type - should the Local Plan be more prescriptive in the house types (detached, semi-detached, terraced, bungalow, flat, etc) the we expect to see delivered? If so, should this be on a site-by-site basis (allocation) basis or a standardised requirement ⁽⁶⁾ across the plan area?

House Size - should the Local Plan require the provision of more 'smaller' (1/2 bed) affordable homes, including flats?

Are there any other issues that need to be considered in respect of housing mix, tenure and size?

Increased Energy Efficiency Measures

5.42 Buildings are responsible for a significant proportion of the UK's total energy usage and generate a significant amount of carbon. Within the context of the broader Climate Change / Climate Emergency agenda, it is therefore imperative that measures are taken to ensure that the need for energy consumption is reduced and also that buildings use energy more efficiently.

5.43 This two-stage approach is currently embedded within policy DEC1 (Principles of Good Design) of the 2017 Local Plan. Firstly, the policy requires developers to demonstrate how choices made at the design stage - e.g. through the layout, orientation and detailed design of development - maximise the potential to secure heating, lighting and cooling passively. Secondly, it require developers to demonstrate how their buildings have been made energy efficient, e.g. by incorporating higher standards of insulation and more efficient windows and doors. However, the policy does not set energy efficiency / carbon reduction targets for new buildings.



Picture 5.4 Climate Change Measures (Source: Pixabay)

6 It should be noted that a standard requirement might not accurately reflect localised/geographic preferences if too generalised



Picture 5.5 Energy Efficiency (Source: Pixabay)

5.44 The energy efficiency of homes is currently promoted by and measured against Part L of the Building Regulations regime⁽⁷⁾. The Government recently consulted on proposed revisions to Part L⁽⁸⁾, which, as shown in the table below, would see improved efficiency standards established in 2020 as a step towards even higher standards in 2025 ("Future Homes Standard").

	Improvement in CO ₂ Emission Rates over Part L 2013 'baseline'.
Part L 2020 "Option 2"	31%
Future Homes Standard 2025	75-80%

Table 5.6 Stepping Up Energy Efficiency Standards

5.45 Once established, these standards (or any variation thereof) would be mandatory for all newly constructed dwellings. Construction to these improved standards would come at an increased cost to developers, with Government estimates⁽⁹⁾ showing an average increased build cost of £4,620 per dwelling for their preferred 2020 standard. Greater costs would likely be incurred in meeting the more extensive Future Homes Standard in 2025.

5.46 While some of the additional build cost could be passed on to the purchaser - noting that people may be willing to pay more for an 'energy efficient' dwelling⁽¹⁰⁾ - the impact of the mandatory 'non-negotiable' standards on the overall viability of a housing development (and the Local Plan as a whole) needs to be clearly understood.

7 <https://www.gov.uk/government/publications/conservation-of-fuel-and-power-approved-document-l>

8 <https://www.gov.uk/government/consultations/the-future-homes-standard-changes-to-part-l-and-part-f-of-the-building-regulations-for-new-dwellings>

9 <https://www.gov.uk/government/publications/the-future-homes-standard-consultation-impact-assessment>

10 Homes constructed to the Government's preferred 2020 standard could save around £250 p.a. on energy bills - <https://www.gov.uk/government/publications/the-future-homes-standard-consultation-impact-assessment>

5 Housing

5.47 There are also early indications that when these new standards are brought in they will be regarded as a ceiling and that Local Plans will not be permitted to require standards over and above those set levels. If that is the case, then the Local Planning Authority will be duty bound to abide by that decision and not consider higher standards.

Question 6

Energy Efficiency

If the implementation of the improved Building Regulation standards does not prevent Local Planning Authorities from doing so, should the Council look to set its own energy efficiency target for new homes that goes beyond mandatory requirements?

Optional Technical Standards

5.48 In 2015, the Government introduced new optional technical standards for homes, covering; "accessible and adaptable" and "wheelchair user" dwellings, water efficiency measures and minimum internal space standards. These optional standards can be adopted as policy through the Local Plan process where there is both demonstrable need to adopt them and clear evidence that it would be viable to do so, i.e. that the increased costs associated with their implementation would not render development unviable. The optional technical standards are as follows.

"Accessible and Adaptable" and "Wheelchair User" Dwellings

5.49 The NPPF is clear that the housing needs - in terms of size, type and tenure requirements - of different types of groups in the community should be assessed and reflected in planning policy. This includes people with disabilities and those with specific accessibility needs.

5.50 Currently, the accessibility of new homes is promoted by and measured against Part M (Volume 1) of the Building Regulations regime ⁽¹¹⁾. It sets the following hierarchy for accessible homes, with the first tier ("Visitable Dwellings") being a mandatory requirement for all new dwellings:



Picture 5.6 Accommodating Wheelchair Users in Design (Source: Pixabay)

<p>M4(1)</p>	<p style="text-align: center;">"Visitable Dwellings"</p> <p><i>Requirements - Reasonable provision should be made for people to:</i></p> <p>(a) gain access to; and</p> <p>(b) use the dwelling and its facilities.</p>	<p>Mandatory</p>
<p>M4(2)</p>	<p style="text-align: center;">"Accessible and Adaptable Dwellings"</p> <p><i>Requirements - As per M4(1) <u>and</u> the provision made must be sufficient to:</i></p> <p>(c) meet the needs of occupants with differing needs, including some older or disable people; and</p> <p>(d) to allow adaptation of the dwelling to meet the changing needs of occupants over time.</p>	<p>Optional</p>
<p>M4(3)</p>	<p style="text-align: center;">"Wheelchair User Dwellings"</p> <p><i>Requirements - As per M4(1) <u>and</u> the provision made must be sufficient to:</i></p> <p>(c) allow simple adaptation of the dwelling to meet the needs of occupants who use wheelchairs; or</p> <p>(d) meet the needs of occupants who use wheelchairs.⁽¹⁾</p>	<p>Optional</p>

Table 5.7 Accessibility Standards

1. A local authority should only require wheelchair accessible homes (as opposed to wheelchair adaptable homes) where they are responsible for allocating or nominating the end user of the dwelling.

5 Housing

5.51 As previously suggested, compliance with the two 'higher' tiers can be made mandatory (as a policy requirement) through the Local Plan process, where supported by appropriate need and viability evidence.

5.52 Government data ⁽¹²⁾ suggests that 37.86% of all households in Scarborough are likely to contain at least 1 person with a long-term health problem or disability, while 3.3% of all households in the UK are likely to contain one or more wheelchair users. Although this data provides a helpful indicator of the potential need for accessible and adaptable homes in Scarborough, further local data will be collected through the production of a new Strategic Housing Market Assessment (SHMA), which will be commissioned through the Local Plan Review process. This approach will allow for a proportionate, locally-derived policy response.

5.53 Nationally, typical policy responses require an identified percentage of homes across a scheme to be built to the relevant standards, e.g. X% of homes to be built to M4(2) and Y% to M4(3) standard. The required percentages should meet identified local needs as far as possible and should be financially viable.

5.54 In terms of viability, the main impact in this case is the additional construction cost associated with building to higher accessibility standards. While a percentage of the additional costs can be recovered through increased sales values, the recoverable percentage is considered to decrease at each tier of the hierarchy, with up to 80% of the additional cost of meeting M4(2) requirements and 60% of the additional M4(3) construction cost recoverable ⁽¹³⁾. These figures may decrease further once the costs associated with meeting other policy / essential infrastructure requirements have also been taken into account.

5.55 Beyond the narrow and specific scope of this technical housing standard, there is also a recognition that the Local Plan should seek to address broader accessibility needs; ensuring that, as far as possible within the control of the planning process, both internal and external environments are safe and accessible for people with disabilities. Work around this subject is ongoing and due consideration will be given as to if / how improved accessibility standards could be applied across the board. Again, the financial implications of any new policies would need to be considered and assessed in the broader context of viability.

12 Guide to Available Disability Data, DCLG (March 2015)

13 This is based on an assessment of the published documents; (a) Department for Communities and Local Government: Housing Standards Review Cost Impacts (September 2014) and (b) DCLG Housing Standards Review - Evidence Report: Cost Benefit Analysis: methods, sources, assumption (2014).



Picture 5.7 Mobility Issues and Room Sizes

Question 7

"Accessible and Adaptable" and "Wheelchair User" Dwellings

The Government introduced optional standards for the provision of accessible and adaptable homes which can be adopted locally if they are shown to be necessary and viable. In respect of this and the above information should the Local Plan adopt these higher standards?

If the Local Planning Authority is to bring in higher accessibility standards what should the level of conformity be with each standard [i.e. M4(2) and M4(3)]?

One option is to apply the standard to new housing based on the latest mobility data available. So for example, if 25% of the population had a limiting mobility issue and 5% are wheelchair users, you could assume that 25% of homes meeting M4(2) and 5% of homes meeting M4(3) would be an appropriate target.

Is this a suitable method for setting a target for delivering accessible homes? If not how should an appropriate requirement be determined? Please give your reasons.

5 Housing

Question 8

Other Accessibility Measures

What other improved accessibility measures / facilities which could be secured through the planning process (through new development)?

Internal Space Standards

5.56 The Government's [Nationally Described Space Standard](#) (NDSS) sets minimum expectations for the Gross Internal (floor) Area (GIA) of all new dwellings, across all tenures. It also sets associated minimum thresholds for bedroom sizes and internal storage requirements. These standards can again be adopted if there is demonstrable need and evidence that they would not unduly affect viability.

5.57 Currently, the NDSS requirements are not embedded as policy within the 2017 Local Plan. However, the Council's Affordable Housing Supplementary Planning Document (SPD) does encourage the delivery of affordable homes to the national standard; only supporting the delivery of smaller units where it can be demonstrated that a Registered Provider is prepared to 'take on' those properties.

5.58 As part of an evidence gathering exercise, approved housetypes on sites with planning permission for 20 or more units over the past 5 years (since 2015) have been measured. Of the 175 housetypes measured (figure excludes flats), 66 (38%) met / exceeded the applicable basic GIA requirement. Of the remaining 109 (62%) units which failed to meet the basic standard, 44 (40%) were significantly (more than 10m²) below the standard.

5.59 Even where the GIA requirements have been met, the vast majority of assessed housetypes were shown to have secondary bedrooms (i.e. not the 'main double / twin') which fail to meet the minimum floorspace thresholds. For these housetypes, it is likely that the relevant requirements could be met by making more efficient use of the overall available internal space - e.g. by reducing the size of the 'main double' and circulation areas (hallways, etc.) - and without increasing the building footprint.

5.60 In contrast, substituting non-conforming housetypes with compliant units would likely require increased building footprints and thus, will often result in a reduction in unit numbers across a site.

5.61 It seems clear, based on the evidence collated to date, that there is a need to introduce the standards. However, this will need to be further explored by the Council through the updating of appropriate evidence, including viability assessment.

Question 9

Internal Space Standards

The Government introduced optional standards for space within homes which can be adopted locally if they are shown to be necessary and viable. In respect of this and the information detailed above, should the Local Plan require all new housing developments to meet the Nationally Described Space Standard?

Are there any particular types of housing development which should be exempt? Please specify which types and why.

Water Efficiency

5.62 The current Local Plan encourages the efficient management of water supplies in Policy ENV6 (Environmental Risk) and Building Regulations apply water efficiency standards to new house building which is set at 125 litres per person per day. Local Authorities can, if required, improve the efficiency standard to 110 litres. The decision to do so must be based on evidence and be justified to manage the demand for water.



Picture 5.8 Water Efficiency (Source: Pixabay)

5 Housing

5.63 The Environment Agency published information on the predicted stresses on the individual water companies in 2013 in respect of the provision of water. This set out whether there was likely to be a low, moderate or serious impact on water resources during a number of scenarios and then provided a final indication as to whether the area was to be classified as being 'serious' or 'not serious'. In respect of Yorkshire Water this was seen as moderate with a final classification of 'not serious'. This would tend to suggest that it is not critical to introduce higher standards at this stage.

5.64 The latest information from Yorkshire Water in their Water Resource Management Plan (2019) suggests that demand will reduce in the early years of the planning period. There are three main reasons for this:

- a continued reduction in leakage from pipes and infrastructure;
- ongoing reduction in household usage due to increased levels of metering; and
- reduced non-household demand due to a continued decline in industrial (non-service sector) use.

5.65 After stabilising in the late 2020's, Yorkshire Water forecast that demand will increase for the remainder to their planning period up to 2045. This increase is due to the impact of population growth, as well as decreasing numbers of customers opting for a metered supply. Yorkshire Water's forecast identified that reductions in water availability due to the increasing risks of climate change could put the company in supply deficit if no action was taken. To remove this risk and meet Government expectation to reduce leakage Yorkshire Water proposes to reduce leakage by 40% by the mid 2030's. This will lead to an overall reduction in demand that will more than outweigh population growth increase.

5.66 This evidence would again not necessarily support an increase in standards at this point in time, however, the most up to date advice from Environment Agency and Yorkshire Water will be sought as part of the Local Plan review process. As with other optional standards any increase in standards over and above the currently imposed mandatory ones will likely have an impact on building costs and subsequently the viability of housing schemes.

Question 10

Water Efficiency Standards

The Government introduced optional standards for increasing water efficiency within homes which can be adopted locally if they are shown to be necessary and viable. In respect of this and the information provided above should the Local Plan consider increasing water efficiency levels above that which is currently mandatory in Building Regulations?

Self-Build and Custom Housing

5.67 The Government sees self-build housing as meeting an identified need and helping to increase housing delivery. Local Authorities have to keep a register of persons interested in self-build and where such parties are on Part 1 of the register, seek to provide enough suitable

Housing 5

sites to meet demand. Currently there are 0 (zero) persons on part 1 of the Self-Build Register and 38 on Part 2. In that respect the Council has no obligation to provide serviced plots/sites, however, the Local Planning Authority currently provides a 6 month update to all persons on the register of all potential sites that may be available with planning consent.



Picture 5.9 Planning a Self-Build (Source: Pixabay)

5.68 The Borough has always delivered what is considered to be a significant number of self-build schemes. Whilst such developments may not have been officially termed as "self-build" there have been many permissions granted for single build plots and conversions taking place on windfall sites.

5.69 Some authorities have introduced policies to further encourage self-build housing or direct it towards certain areas. Some options that have been used across the country include the following though this is not an exhaustive list:

- Allocate self-build sites - the Local Plan could seek to allocate a site or sites across the Borough that were for the specific purpose of self-build. Under such requirements the Council would normally have to ensure these sites are serviced;
- Consider a policy that requires housing developers bringing forward large sites (the exact size would be determined) to set aside a certain percentage of plots for self-build projects. Such a policy may have a time requirement whereby if prospective self-builders do not take up the option to build at the site, such plots would be returned to the open market via the housing developer;
- Consider a policy that allows small self-build homes to be built outside but close to the development limits of towns and villages for the purposes of meeting an identified local housing need (this would be an extension to the rural housing exceptions policy and limit homes to a specific size).

5 Housing

Question 11

Self-Build Housing

What option(s) should be taken forward in respect of self-build and custom build housing through the Local Plan review? You can select more than one and also make alternative suggestions.

Option 1

Self-Build Housing Option 1

Continue with the current process of allowing the market to deliver self-build plots and opportunities through windfall sites. As such the option is to NOT allocate sites for self-build plots or introduce a specific policy.

Option 2

Self-Build Housing Option 2

Allocate site(s) to provide opportunities for self-build in areas where need has been identified.

Option 3

Self-Build Housing Option 3

Require that a certain proportion of self-build plots are made available on large allocated sites.

Option 4

Self-Build Housing Option 4

Allow self-build outside of development limits (within close proximity) where there is a local need and the size of the dwelling is restricted to (x) m².

Climate Change and the Natural Environment 6

6 Climate Change and the Natural Environment

6 Climate Change and the Natural Environment

6.1 The delivery of development that is 'sustainable' in all aspects is fundamental to what the planning and development process should achieve. This is embedded within the core approach of the 2017 Local Plan, which on a fundamental level seeks to facilitate the delivery of identified development needs in the most sustainable locations, i.e. in and around the main towns of Scarborough, Whitby and Filey, so that the need for people to travel to access key services and facilities is minimised as far as possible. The 2017 Plan also includes a range of environmental policies. These are predominantly focussed on protection measures, e.g. avoiding development in environmentally sensitive areas (including internationally, nationally and locally designated sites) and sites / areas which pose particular environment risk to communities (including flood zones, coastal erosion zones, contaminated sites, etc.).



Picture 6.1 Throxenby Mere

6.2 Notwithstanding the above, there has been a considerable push to deliver enhanced environmental gains through the development process over recent years. Indeed, Scarborough Borough Council was one of a number of local authorities across the country to declare a "Climate Emergency" in 2019. The Plan Review process therefore provides an opportunity to

Climate Change and the Natural Environment 6

consider what additional policy measures - so far as they are appropriate and proportionate - can be incorporated to help achieve local and national targets for environmental improvements. As set out below, potential measures including securing a 'net gain' in biodiversity, minimising carbon emissions from new development and the implementation of carbon 'offsetting' measures.

Achieving a 'Net Gain' in Biodiversity

6.3 Biodiversity net gain is an approach to development that aims to leave the natural environment in a measurably better state than beforehand. It does not alter the requirement for biodiversity to be considered through the core environmental planning principle of the 'mitigation hierarchy', which seeks to avoid, mitigate or compensate for biodiversity losses.

6.4 The NPPF, in paragraph 174(b), says planning policies and decisions should identify and pursue opportunities for securing measurable net gains for biodiversity. The role of the Local Plan is to create policies which will influence how development takes place across the Borough, whilst ensuring that we can still protect and enhance the natural environment and recognise the potential for improvements in biodiversity through all new developments. Such improvements need to be measurable so that each new development can suitably demonstrate a net gain in biodiversity can be achieved.

6.5 It is widely expected a that new Environment Bill is forthcoming which will introduce new duties for Local Planning Authorities and may make a mandatory requirement for developments to achieve a 10% net gain. Such net gain outcomes should be maintained for a minimum of 30 years. It is likely it will also introduce provisions requiring the development of Local Nature Recovery Networks which aim to help support better spatial planning for nature recovery by setting out priorities and opportunities.

6.6 The Local Plan recognises the value and intention of the 10% net gain requirement in that, not only would it secure gains in biodiversity but would also help to secure wider improvements in design standards if enhanced landscaping measures were effectively incorporated at the street level. In turn, the integration of enhanced natural features will also help to capture carbon emissions and promote mental health and wellbeing. With this in mind, the Council are keen to ensure such benefits are fully realised and will consider specific means that may help in delivering net gains through the Local Plan period.

Question 12

Achieving a 'Net Gain' in Biodiversity

If a 10% net gain in biodiversity becomes mandatory, should the Council look to go further?

If a 10% net gain in biodiversity is not made mandatory, should the Council aim to meet this requirement anyway?

Are there any specific measures the Council should look at including in order to ensure the delivery of biodiversity net gains in developments?

6 Climate Change and the Natural Environment

Carbon 'Offsetting'

6.7 As previously discussed, a key part of meeting local and national targets for reduction in carbon emissions will be the implementation of 'offsetting' measures / projects.

6.8 At the neighbourhood level, the delivery of high-quality green spaces and the integration of natural landscaping features within our streets will not only help to achieve 'net gains' in biodiversity (see above) but will also capture carbon emissions from new development. At this stage, it is intended that the delivery of high-quality landscaping schemes will be secured through the implementation of design policy.

6.9 The delivery of more comprehensive 'offsetting' schemes will also be required in order to make a significant contribution towards meeting the overall target of 'net zero' emissions. Examples of such schemes include the planting of new woodlands, orchards and meadows, peat bog enhancement / restoration and other green infrastructure improvements. While a full assessment of potential delivery mechanisms needs to be undertaken, the scope for introducing an effective 'levy' on new development will be explored in the first instance. Depending on the associated impact on the viability of development (to be assessed through the plan-making process), this would require every new home built to make a fixed financial contribution towards the co-ordinated delivery of off-site measures.

Call for Sites

As part of the request for the submission of sites at Section 13 'Allocation and Call for Sites' we are also asking for willing landowners to submit sites that could be utilised for tree planting or other forms of natural habitat creation.

Question 13

Carbon 'Offsetting'

Should we include a requirement within the Local Plan which requires developers to contribute towards the delivery of tree planting initiatives within the Borough?

Do you own any sites / areas of land that could be utilised for large-scale tree planting? If so, please submit your site to us for consideration (see Section 13 'Allocation and Call for Sites').

Where appropriate, should we require street trees to be incorporated into all new housing developments?

Design 7

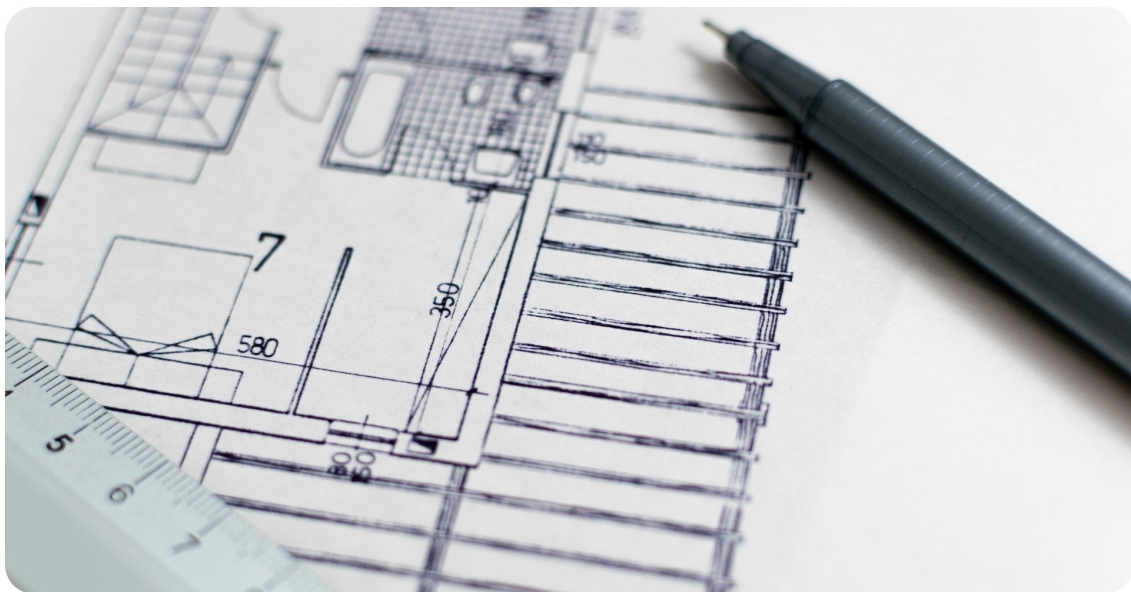
7 Design

7 Design

7.1 Changes to the NPPF first embedded within its 2018 revision have placed additional emphasis on the need to secure development that is well-designed; to ensure that development is sustainable and to create better places in which to live and work. The recently published National Design Guide (NDG) builds upon this agenda and provides further guidance on how development can be carried out in accordance with good design practice. The NDG will ultimately sit together with a National Model Design Code (NMDC), which is also being developed, in order to set baseline standards for design quality and practice across the country. It is anticipated that the NMDC will draw from the recommendations of the Building Better, Building Beautiful Commission's recently published final report, "Living with Beauty"⁽¹⁴⁾, which again presses for improved standards of design.

7.2 In addition to the policy and guidance being produced at the national level, there is an expectation from the Government that local planning authorities will produce locally-specific design policies, guides and codes. These tools should clearly communicate what good design looks like at the local level, be shaped by an understanding of the area's distinctive qualities and opportunities, and should contribute towards the delivery of a collaboratively-developed vision of how an area will look, feel and function in the future.

7.3 Therefore, while other policy tools such as design guides and codes - to be adopted as Supplementary Planning Documents - will play a key role in helping to deliver well-designed places, the early stages of this Local Plan review provides an opportunity to consider what is unique about Scarborough Borough, the character of its constituent settlements and what new development in those areas should look like. As a starting point for thought / discussion, the following boxes provide an overview of what the planning authority considers to be the positive defining characteristics of different types of settlements across the Borough.



Picture 7.1 Plan Drawing (Source: Pixabay)

Scarborough

The town of Scarborough comprises a large number of different character areas, each reflecting different periods in the history of the town and each containing their own set of positive defining characteristics. Those presented below are those which are consistent across the various character areas:

- **A strong built heritage** - Georgian and Victorian architecture with some older development, particularly near to Scarborough Castle
- **Views** - of natural⁽¹⁵⁾ and physical⁽¹⁶⁾ landmarks
- **The relationship with, and the prevalence of, green spaces** (parks, gardens and squares) **and other natural features** (e.g. tree-lined roads, etc.)
- **Front boundary walls and railings**
- **Co-ordinated use of materials** - alternating colours and treatments between streets
- **Bay windows**
- **Decorative detailing** - particular emphasis on decorative eaves (brickwork detailing), cornicing, cills and lintels



Picture 7.2 Views around Scarborough

15 The North Sea, Oliver's Mount, Jacob's Mount and the North York Moors National Park

16 Castle Headland, Grand Hotel, churches and spires, etc.

7 Design



Picture 7.3 Views around Whitby

Whitby

Whitby presents an interesting composition of contrasting characteristics; most notably in the difference between the historic port on East Cliff and the coastal resort area on West Cliff. The positive defining characteristics across the town are as follows:

- **Topography, setting and views** - high intervisibility within the town (views across the River Esk) and visual prominence from the surrounding area
- **Strong built heritage and relationship with both the River Esk and the North Sea** - contrast between 'historic port' (East Cliff) and 'resort town' (West Cliff) characteristics
- **Historic Port (East Cliff)** - Tall and narrow buildings opening onto narrow streets; yards and ginnels; mix of red brick, render and stone buildings with pantiles; flat frontages with traditional detailing (lintels, cills and door surrounds)
- **Resort Town (West Cliff)** - Imposing 3-4 storey Victorian terraces; mix of red brick and rendered buildings with slate roofs; boundary walls and railings; bay windows (including triangular); lintels and cills; decorative door surrounds with fanlights; cornice detailing

Filey

Filey again comprises a number of different individual character areas. The positive defining characteristics of the town are as follows:

- **Strong relationship with the sea and coastline**
- **Historic fishing village core (Queen Street)** - mix of 2-3 storey properties; brick, render and pantile construction; traditional detailing (cills, lintels, windows and doors set in deep reveal, etc.)
- **Imposing Victorian and Edwardian terraces** - up to 4 storeys, predominantly brick and slate, bay windows, arts and crafts detailing (overhanging eaves and cornice detail), decorative brick detailing (stringer courses, arches, dog-toothing, etc.)
- **High quality public space and street trees** - e.g. Crescent Gardens, Glen Gardens, West Avenue



Picture 7.4 Views around Filey

7 Design



Picture 7.5 Moors Fringe Villages

"Moors Fringe" Villages

As suggested, this includes all villages along the fringe of the North York Moors National Park. The positive defining characteristics of these types of villages are often derived from their historic cores - as any sense of unifying character tends to erode towards the edges of village settlements - and include:

- **Strong visual relationship with the surrounding landscape**
- **Linear pattern of development with building frontages up to the edge of the pavement** - building line set back more towards the edges of settlements
- **Simple / traditional building form and balanced proportions** - narrow layouts, gable ends, steep dual-pitched roofs, run-through chimneys
- **Materials** - stone and pantile
- **Traditional detailing and fenestration** - stone copings and kneelers, cills, timber sliding sash windows

"Wolds Fringe" Villages

This group includes those villages sited along the fringe of the Yorkshire Wolds in the south of the Borough. Again, the positive defining characteristics are derived from their historic cores, are broadly similar to the "Moors Fringe" Villages and include:

- **Strong visual relationship with the surrounding landscape**
- **Linear pattern of development with building frontages up to the edge of the pavement** - building line set back more towards the edges of settlements
- **Simple / traditional building form and balanced proportions** - narrow layouts, gable ends, steep dual-pitched roofs, run-through chimneys
- **Materials** - mix of chalk, brick and rendered / painted buildings with clay pantiles
- **Traditional detailing and fenestration** - stone copings and kneelers. cills, timber sliding sash windows
- **Diagonal brick detailing to gable ends** - often in older buildings of chalk construction but also reproduced in more recent buildings



Picture 7.6 Wold Fringe Villages

7 Design

Question 14

Design

NOTE: The following questions are directed primarily at those who live in Scarborough Borough. Please make it clear which settlement you are referring to in your comments.

Do you agree with the characteristics of the different towns and village groups identified above? Has anything been missed?

What do you consider to be the positive defining characteristics of the place where you live (in the Borough)?

How has new development influenced the character of the place where you live? Are there any examples of recent developments in the Borough you consider to be "well designed"? If so, where/what are they and why do you think they are well designed?

What do you think new development should look like in your area? Should an emphasis be placed on local traditional forms, styles, materials and detailing? Or, should contemporary designs be encouraged?

Role of Town Centres 8

8 Role of Town Centres

8 Role of Town Centres

8.1 The role of the traditional high street is changing. While Scarborough Borough's town and district centres were, to some extent, insulated from the decline in the high street that followed the economic recession in the late 2000's, changes in consumer shopping habits have more recently resulted in the closure of retail units and a shift in expectations around what services town centres should offer. In recognition of this trend, the Council's Regeneration Service is working to develop a Strategy for each of the Borough's town centres, starting with Scarborough and Whitby centres, where various streams of Government funding are being actively sought to help deliver a series of key projects, improvements and initiatives aimed at diversifying their offer, increasing levels of activity and improving long-term resilience.



Picture 8.1 Whitby Shopping

Role of Town Centres 8

8.2 Across the Borough's centres the Local Plan can play a significant role in helping to secure their long-term vitality and viability. Potential policy options could include the consolidation of the existing retail (Primary Shopping Area) and wider town centre boundaries; important land designations around which decisions on planning applications for town centre uses are judged (town centre first principle). Other options could include providing explicit policy support for planning applications that seek to change the use of existing retail units to other forms of development.

8.3 More 'active' interventions, such as allocating land for the development of housing and offices (uses which bring people in to town centres), could also be explored. However, it should be noted that the ability to deliver on such allocations will inevitably be constrained by land-assembly issues and reliant upon willing land owners, who may ultimately wish to see their properties retained in their current use.

8.4 In exploring the range of available policy options it is imperative that the needs of different businesses (types and scales) are understood. For example, there is a need to ensure that a range of commercial units are available for small and medium sized businesses, particularly in terms of 'edge of centre' premises, which might otherwise come under pressure for redevelopment.

Question 15

Town Centres

Should we consolidate the retail offer of our town centres and concentrate the provision of shops into the most central locations, i.e. focus on the main high street?

Should the Local Plan allocate sites for housing, offices and/or other forms of mixed-use (non-retail) development in the Borough's town centres? If yes, should this approach be adopted across all centres, or in one of more of Scarborough, Whitby or Filey?

What other uses, services and facilities do you think should be sought within the Borough's town centres or what other function should the town centres perform?



Picture 8.2 Town and Neighbourhood Centres around the Borough

Economic Needs 9

9 Economic Needs

9.1 There is often considered to be a close relationship between economic growth and housing needs; between the workforce and resident population. Indeed, the housing target set within the 2017 Local Plan was derived from, amongst other things, the additional 5,000 full-time equivalent jobs that were forecast to be created by the end of the plan period (by 2032). As previously discussed, the Local Plan Review will explore whether this job growth target is still relevant. New economic needs evidence will be produced; this will identify a new job growth target and further explore the relationship between economic growth and housing needs.

9.2 Regardless of the final target, a key part of delivering anticipated job growth on the ground is to ensure that the right land is available in the right places; to ensure that the needs of modern businesses can be met. Owing to the relative lack of suitable sites for commercial / industrial development across the Borough, the 2017 Local Plan focussed on the continued growth of Scarborough Business Park. The 2017 Plan took a long-term (beyond the plan period) view on the development of the Business Park, to ensure that the strategic importance of this location was protected. Although limited development has occurred on Scarborough Business Park in the years since the adoption of the 2017 Plan, there is no evidence that an alternative approach should be adopted in the Plan Review. Indeed, as long as the needs for other forms of development continue to be planned for effectively, there is considered to be no other external development pressures that override the need to protect the Business Park as the long-term focus for economic development in the Borough. It is therefore not proposed to review the current Scarborough Business Park allocation through the review of the Local Plan.



Picture 9.1 Offices at Scarborough Business Park

9 Economic Needs

9.3 Elsewhere, the decision has been taken not to update the Whitby Business Park Area Action Plan (AAP), which allocates sites for industrial development in the north of the Borough. This AAP will be considered for review within the next 5 years by both the Council and the North York Moors National Park Authority as this is a joint publication.

9.4 To the south, the allocation at Hunmanby Industrial Estate has been subject to enquiries and a recent planning application. The success and / or identification of particular issues through the planning application process may highlight the need for policy interventions in the Plan Review at a later date. This could potentially include the allocation of alternative / additional parcels of land for employment development in the south of the Borough.

Question 16

Economic Needs

Do you agree that the current provision of employment land at Scarborough Business Park remains appropriate and does not need further review at this stage?

Should additional land be allocated in the south of the Borough at Hunmanby Industrial Estate?

Have you any other comments or suggestions in relation to employment sites and/or the economy?

Securing Local Employment and Skills Training

9.5 There is evidence which suggests that there is a national shortage of construction workers ⁽¹⁷⁾. Clearly, if we are to meet the Government's ambitious house building agenda, a significant increase in skilled workers is required. Addressing existing skills shortages requires active intervention at all levels, including locally.

9.6 The 2017 Scarborough Borough Local Plan includes a policy which seeks to secure employment and training opportunities for local people through the development process. Currently, Policy EG2 (Jobs and Skills and Employment Training) confirms that the Borough Council will seek to secure (through a S106 Agreement) those opportunities from developments which generate a "significant number of construction and operational phase jobs".

9.7 To be clear, this is an aspirational policy ("will seek to...") rather than a strict requirement and as such, only a limited number of large-scale developments in the area have committed to providing jobs and/or training opportunities for local people. With this in mind, the Plan Review provides an opportunity to consider whether a more formal policy requirement should be introduced.

17 The Chartered Institute of Building (CIOB) has reported that the construction industry will need to find 160,000 new recruits by 2023 to keep up with demand

Economic Needs 9

9.8 Any amended policy will have to consider how alternative provision can be made where developers cannot, for legitimate reasons, utilise the local workforce. Solutions could include securing a financial contribution towards securing appropriate construction skills training opportunities in the local area. Similarly, the requirements could also be waived where companies run similar initiatives and it can be demonstrated that sufficient opportunities are afforded to local people. Again, the financial implications of such requirements would have to be fully considered.

Question 17**Securing Local Employment and Skills Training**

Should the Local Plan formally require developers to secure a percentage of the associated construction and operational phase jobs locally?

If so, should there be a threshold, i.e. should the policy only apply to developments of a certain size? What should that threshold be? e.g. 100 dwellings.

Promoting Healthy Communities 10

Promoting Healthy Communities 10

10 Promoting Healthy Communities

10.1 The promotion of health and well-being can be secured through a variety of means. As set out within the NPPF, places should promote social interaction, be safe and accessible, and enable and support healthy lifestyles. The 2017 Local Plan emphasises these points and in particular, seeks to secure the provision of appropriate services and facilities, including a network of high-quality green spaces for sports and general recreation purposes. However, once again, there may be scope to go further.

10.2 The Council has, for a number of years, expressed concern over the proliferation of hot food takeaways in the Borough. Previous consideration of this matter concluded that the planning system was perhaps not the best / most effective method of controlling the number and location / concentration of hot food takeaway premises. For example, the effectiveness of limiting such establishments could be questioned given the ease with which food can be delivered to peoples' homes. Moreover, it should also be noted that the planning system does not differentiate between types of takeaways - they all fall under the same 'land use class' (A5 use) - and as such, would controls around their provision be in direct conflict with / detract from the area's seaside resort character? This is an issue we are keen to get residents' views on through the Plan Review process.

10.3 In addition to the above, there are perhaps more proactive ways of encouraging healthy lifestyle and food choices that could be explored. These include, for example, allocating land for allotments and requiring developers to provide features such as 'community orchards' and small-scale food growing 'planters' within their landscaping schemes, thus encouraging people to grow / harvest their own food and fruits.

10.4 The Building Better, Building Beautiful Commission's recently published final report, "Living with Beauty", recognises the positive impact that greenery in the urban environment can have on mental and physical health. One of the key recommendations of the report is focussed around "re-greening" our towns and cities. Securing high-quality landscaping schemes, including the provision of 'street trees', within new development will be a point of emphasis in the Plan Review.



Picture 10.1 Street Trees and Allotments

10 Promoting Healthy Communities



Picture 10.2 Walking along the Cleveland Way

Question 18

Promoting Healthy Communities

There are different options that can be considered which can potentially have a beneficial impact on the lives of our residents and visitors; a number of which have been identified above. Considering these matters:

- Should we place a limitation on hot food takeaways either in terms of number or location?
- Should we identify locations for new/expanded allotments?
- Should we require 'street trees' to be provided within new housing developments?

What other measures to promote healthy communities should we explore through this Local Plan review?

Other Matters 11

11 Other Matters

11 Other Matters

11.1 The information presented in this Issues and Options Paper outlines the topics that are considered important to cover in the Local Plan review. They are by no means exhaustive and other matters will likely arise during the review process either nationally (through Government policy changes) or locally from the Council itself or through the local community, businesses and other interested parties.

11.2 If there are any changes you consider necessary then please submit information detailing the changes proposed and the reason it is required.

Question 19

Any Other Matters Raised

Please set out any other matters that you consider should be considered through the Local Plan review.



Picture 11.1 Headland at Scarborough

Local Plan Viability 12

12 Local Plan Viability

12 Local Plan Viability

12.1 As discussed throughout this document, ensuring that the Local Plan review results in a deliverable and viable policy framework is an essential part of this process. The document has set out many different issues, most of which will clearly have a financial implication on development. New housing development remains a priority for the Government but there are, however, many demands on new housing pulling in different directions. Whilst not exhaustive these include the following:

- the provision of infrastructure including open space, education capacity, investment into primary health care, road infrastructure and more;
- the delivery of affordable homes;
- the provision of homes that are of a specific space standard (in accordance with nationally described space standards);
- the provision of accessible, adaptable and wheelchair accessible homes;
- the need to be energy efficient in terms of future energy requirements and construction;
- the provision of homes that are designed to be more water efficient;
- Carbon emission 'offsetting' measures, e.g. areas for enhanced tree planting or natural habitat creation;
- ensuring that a proportion of the construction workforce is locally derived.

12.2 All of the above have financial implications on a development and are all priorities in their own right, although there are increasing levels of pressure on specific matters of late. In addition, certain requirements are generally non-negotiable in that a development would simply be unacceptable without an appropriate contribution. This normally includes those matters listed in the first bullet points; education, open space provision, health contributions and any required wider road investment.

12.3 The remainder of the 'optional' requirements are therefore all competing for investment from a finite pot of money. The NPPF is clear that plans and policies must be deliverable; their policy requirements should not render development unviable. The above has set out information on all of these competing demands.

12.4 The NPPG states that plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). These policy requirements should be informed by evidence of infrastructure and affordable housing need, and a proportionate assessment of viability that takes into account all relevant policies, and local and national standards, including the cost implications of the Community Infrastructure Levy (CIL - *not relevant to Scarborough Borough Council*) and Section 106. **Policy requirements should be clear so that they can be accurately accounted for in the price paid for the land.**

12.5 The review of the Local Plan will determine levels of affordable housing as well as any other adopted requirements from the options listed in this section, though as stated this is not necessarily an exhaustive list. To understand locally what is important the following question asks for consultees to rank their preferences in terms of what development should aim to deliver.

Question 20

Competing Housing Needs

Putting the usual requirements of housing to one side (contributions to education, open space, health providers, etc), please rank the following demands on housing in order of importance:

- a. the delivery of affordable housing;
- b. the provision of homes that are of a specific space standard and generally with larger room sizes than has recently been delivered (in accordance with nationally described space standards);
- c. the provision of accessible, adaptable and wheelchair accessible homes;
- d. the need to be more energy efficient in terms of future energy requirements and construction;
- e. the need to be more water efficient;
- f. implementing carbon offsetting measures such as tree planting and natural habitat creation;
- g. providing construction jobs to local people.

If other housing needs have been missed off please include them in your response.



Picture 12.1 Finite Resources - Difficult Choices

Allocation and Call for Sites 13

Allocation and Call for Sites 13

13 Allocation and Call for Sites

13.1 As part of the Local Plan Review process, site submissions are being invited for a variety of uses. As well as housing allocations, sites for uses such as employment, leisure and retail will be considered. Additionally, sites to be considered for the potential to provide natural capital in the form of tree planting or habitat creation can be submitted.

13.2 The current Local Plan allocated sites for circa 6,710 homes (5,786 for the period up to 2032). Many of these sites have been developed, have seen construction commence, consent granted or have seen pre-application negotiations. However, some of the allocations have not shown any sign of progress. Notwithstanding the above, all sites that have not progressed to application stage will be re-assessed as part of the Local Plan review process to determine if they are likely to be developed by the end of the revised Plan period (March 2038).

13.3 The actual number of sites that will be required is therefore wholly dependent on the outcome of the determination of the Local Plan housing requirement (see 'Scale of Housing Development')

13.4 To ensure that the housing requirement will be met in terms of deliverable sites, this stage of the Plan review will also request the submission of potential sites for housing allocation through a formal 'call for sites'. This will allow for sites to be considered potentially against sites that are already allocated but have stalled.

13.5 To assist in the assessment of sites and to ensure transparency for landowners and developers the Site Assessment Methodology has been updated from that used previously. The updated assessment is available to view at 'Housing Site Methodology' and your comments on this methodology will also be welcomed prior to its finalisation and use in assessing the sites that are submitted. Please attach your comments to Question 2 'Housing Site Assessment Methodology'

Information Required with Site Submission

13.6 Anyone wishing to submit a site for consideration will be required to provide substantial detail on the proposal and following the updated information on viability in the NPPF and planning guidance, viability will now be a fundamental part of any submission. If any of the required information is not available at the time of submission, please make this known in the response and provide timescales when such information would be likely to follow. The submission document for new sites is available to complete online on the [Consultation Portal](#) or to download on the Council's Planning website at [Current Consultations](#). Alternatively a paper copy can be sent on request. You will be required to submit the following information (not an exhaustive list):

- An Ordnance Survey based location plan showing the site outlined in red. If you own additional land adjacent to the site which does not form part of the submission please outline in blue;
- Site address and area (hectares);
- Agent / Landowner details (any sites in multiple ownership should identify on a supporting plan the different areas of ownership);

13 Allocation and Call for Sites

- If sites are in multiple ownership an agreement between landowners that they will work together to bring the site forward and have entered into an equalisation agreement;
- Developer details (if applicable);
- The current use of the site and proposed use (housing/employment/mixed/etc.);
- The proposed timescale for delivery of the site;
- Viability information for the site that confirms abnormal costs, constraints that may affect the development (financial, legal matters, etc.), and formal confirmation that all contributions have been taken into account (affordable housing, open space and play, education, health, highways, etc.), and that the site remains available for development in respect of the land valuation;
- Confirmation that the site can be connected to gas / electricity / fibre broadband / water supply;
- Details of any other ownership that affects the access to the site.

Housing Site Methodology

Housing Site Methodology

Housing Site Methodology

Local Plan Review Housing Allocation Site Selection Methodology

Introduction

The purpose of this document is to set out the process by which sites are considered as part of the Local Plan review. The methodology is to be used to assess and compare all sites that form the library of potential housing sites that have been submitted to the Council for inclusion within the Local Plan review. Establishing a methodology at this stage, early in the process, ensures all potential sites can be assessed in a fair, consistent and robust manner and allows all site promoters to understand the assessment prior to submitting a site. A formal call for sites response form has also been prepared and the information provided within these completed forms will form an important basis for assessing sites.

A site assessment methodology was used to assess sites as part of allocations process of the current Local Plan, adopted in July 2017. The Inspectors Report in to the soundness of the Plan concluded that "the approach taken to assessing and selecting sites was thorough, fair and proportionate." As such, it is not intended to undertake a fundamental revision of the criteria, but more to update and amend to ensure that it satisfies the requirements of the Sustainability Appraisal and also responds to any revisions to policy and guidance in the National Planning Policy Framework and Planning Practice Guidance.

The methodology therefore proposes to retain the three-stage process used previously which comprises a first stage initial assessment to identify major, insurmountable constraints; a second stage detailed assessment of sustainability and site specific constraints; and a third stage assessment of deliverability. This iteration differs from the previous methodology in that it no longer presents a numerical score, instead favouring a positive/neutral/negative assessment. The benefits of this are to allow a more readable final assessment as each individual site assessment will be presented in a more user-friendly consistent approach adopted.

The Council is inviting comments on this proposed assessment methodology. Comments should be made at Question 2 'Housing Site Assessment Methodology'

Sites can still be submitted at this stage. Sites can be submitted online at using the online form available at [Consultation Portal](#) or the form downloaded at the [Local Plan Consultation Website](#).

Using This Methodology

The methodology will be used in a consistent manner to assess the following sources of sites:

- All sites that have been submitted for consideration as part of the Local Plan review process submitted through the above referred to methods. These forms need to be completed as thoroughly as possible in order to be considered through this assessment methodology;
- Sites identified through other sources such as the Council's Strategic Housing Employment Land Availability Assessment (SHELAA) or employment Land Review; and
- Extant housing allocations where development has not yet commenced (or no firm progress to delivery has been established).

Housing Site Methodology

In accordance with the requirement of Paragraph 68 of the NPPF which emphasises the important contribution small and medium sized sites can make to meeting the housing requirement of an area, sites will only be considered where they are capable of delivering 5 or more dwelling houses or exceed 0.15 ha in size.

Where a site is smaller than this threshold, and is adjacent to the edge of a settlement, it can still be submitted separately for consideration for an amendment to the defined development limits. The development limits define the extent of a settlement. Where a site is within the development limits of a settlement, the principle of development is established subject to other relevant Local Plan policies, and where outside the development limits, a site would be considered to be in the open countryside and considered against relevant Local Plan policies.

Site Ref and Address		
		Site Area
Question	Score	Commentary
Stage 1		
1. Conformity with Settlement Hierarchy		
2. Designated Biological /Geological Site		
3. Designated Historic Sites		
4. Coastal Change		
5. Flood Risk		
Stage 2		
6. Brownfield or Greenfield?		
7. Accessibility to Services Score		
8. Accessibility to Recreation Score		
9. Regional and Local Biodiversity		
10. Trees and Hedgerows		
11. Historic Environment		
12. Character of Built Area		
13. Impact on Landscape		
14. Flood Risk		
15. Agricultural Land		
16. Water Supply and Source		
17. Mineral Resources		
18. School Capacity		
19. Capacity of Utility Providers		

Housing Site Methodology

20. Impact on Local Highway Network		
21. Impact on Strategic Road Network		
22. Land Use Conflicts		
23. Any Other Constraints?		
Stage 3: Deliverability		
24. Land Ownership Constraints		
25. Availability Constraints		
26. Viability		
27. Estimated Timescale for Delivery		
28. Estimated Yield		
Concluding Remarks		

Table A1 Site Assessment Template

Stage 1

Each site assessment will comprise an initial stage 1 compliance check. This is to ensure sites are in accordance with critical criteria that cannot be mitigated against by any means. Simply put, where a site scores red (or conflicts with one or more of the Stage 1 criteria), it will be considered not suitable for allocation and will be rejected from the site assessment process and will not be allocated in the Local Plan.

1. Conformity with the Settlement Hierarchy

Is the site well related to a settlement as identified in the settlement hierarchy?



This question is to consider whether the allocation of the site would be in accordance with the settlement hierarchy as outlines in current Local Plan Policy SH 1. The current settlement hierarchy is as follows:

- a. Scarborough Urban Area (including Scalby, Newby, Osgodby, Eastfield, Corssgates and Cayton);
- b. Whitby (including Ruswarp);
- c. Filey;

Housing Site Methodology

- d. Service Villages: Burniston, East and West Ayton, Hunmanby, Seamer⁽¹⁸⁾, Sleights⁽¹⁹⁾ and Snainton.
- e. Rural Villages: ⁽²⁰⁾

The scale of the smaller villages and settlements ('Rural Villages' and other hamlets and settlements) is such that they will generally be inappropriate for allocation of housing sites except for small infill sites, wholly affordable developments or mixed private/affordable schemes in line with the NPPF.

Proposed sites will be dismissed if they do not lie within or adjacent to Scarborough Urban Area, Whitby, Filey or the Borough's Service Villages unless they are located within rural villages and there are particular circumstances that would warrant an allocation.

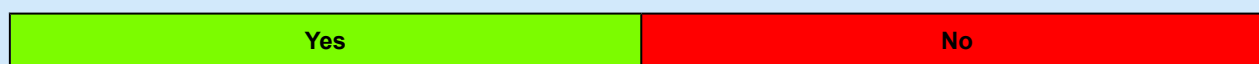
The term 'adjacent to' relates to sites that are close to existing settlement boundaries. Submitted sites that appear unrelated to existing settlement boundaries, for example, separated by fields or tracts of open countryside are unlikely to be considered appropriate for inclusion.

The commentary should also identify if the site is of a scale that may be appropriate for the settlement it is sited or is well related to.

Where sites may not be appropriate for allocation they may be suitable for affordable exception schemes. Where this may be the case they would be more appropriately considered through the relevant Rural Exceptions Housing policy and, if they have merit, taken through the planning application process.

2. Designated Biological / Geological Sites

Is the site within the prescribed distance of any national or international site of biodiversity or geological value; e.g. RAMSAR, SSSI, SAC, SPA, National Nature Reserves?



The European Birds and Habitats Directive and the Conservation of Natural Habitat & Species Regulations set strong levels of protection for a number of designated sites. As such, sites will be excluded if they are wholly within an internationally or nationally designated site including:

- Special Protection Areas (SPA);
- Special Areas of Conservation (SAC);
- RAMSAR sites;
- Sites of Special Scientific Interest (SSSI).

18 Including Irton

19 Including Briggswath and Eskdaleside

20 All other villages with defined Development Limits Reighton, Speeton, Folkton, Flixton, Muston, Gristhorpe, Lebberton, Wykeham, Ruston, Sawdon, Brompton-by-Sawdon, Cloughton and Sandsend.

Housing Site Methodology

The housing assessments identify where any of the following impacts are relevant to any of the above protection areas and if they are of such significance that the site should be dismissed:

1. Increased recreational pressure, particularly if the site is within 5km of a protection designation area. This includes walking / trampling which causes soil compaction and erosion. Walkers with dogs contribute to pressure on sites through nutrient enrichment via dog fouling and also have potential to cause greater disturbance.
2. Impact from major urbanisation (100 plus dwellings) most notably associated with increased fly-tipping and cat predation. Within 5km of designated sites.
3. Increased pollution - Sulphur dioxide and ammonia emissions not relevant as they result from industrial processes & agriculture. 92% of Nitrogen Oxide emissions (NO_x) from the sites will be vehicle exhaust emissions. Only consider localised rather than diffuse pollution levels. This is relevant where a site is within 200m of a protection designation area.
4. Impact on water levels and quality and other water abstraction impacts (particularly relevant to River Derwent SAC). Sites that lie upstream and drain into the River Derwent could potentially have an impact.

Nationally designated sites are also legally protected under the Wildlife and Countryside Act 1981 (amended) whereby Local Planning Authorities must seek to protect and enhance their conservation. These sites include:

- Sites of Scientific Special Interest (SSSI); and
- National Nature Reserves (NNR).

Development that would adversely affect an SSSI would not normally be permitted, unless the benefits of any proposed development were such that it would outweigh any negative impacts.

It should be determined whether development sites on, adjacent or within close proximity to such national designations have the potential adversely impact the above NNR's and SSSI's.

Any proposal that would cause significant negative impact on an international or national designation will be dismissed.

Sites located in or around, or that may impact upon regional or local designations or further areas of biodiversity will be covered in a later stage of assessment.

3. Designated Historic Sites

Would the development of the site have an adverse negative impact upon nationally-important archaeology (including Scheduled Monuments) or other high Grade Designated Heritage Assets or their settings?

Yes

No

Housing Site Methodology

Nationally-designated heritage assets include archaeological remains, Scheduled Monuments, Historic Parks and Gardens and Listed Buildings of any grade and due to their designations means they are of national importance where a presumption should be held in favour of preservation. Archaeological remains and Scheduled Ancient Monuments are protected by the Ancient Monuments and Archaeological Areas Act (1979).

Further to nationally designated buildings, Scarborough Borough has internationally important listed buildings with Scarborough Castle, Whitby Abbey and the Rotunda Museum. It is important to consider not only a direct effect of proposals on the asset of such designations but also where the setting of these may be compromised.

Any proposals that would significantly adversely affect the asset to the setting of an internationally or nationally important archaeological site, Scheduled Ancient Monument or Grade I Listed Building will be dismissed.

When considering proposed sites, input from Historic England will be sought where a site adjoins or has the potential affect any of the above. The consideration of further heritage protection such as listed buildings and Conservation Areas will be assessed later in the process.

4. Coastal Change

Does the site lie within an area considered to be at significant risk of coastal erosion?

Yes	No
-----	----

The risk to land from coastal erosion is and will continue to be an important consideration for Scarborough Borough, bearing in mind previous landslips at Holbeck Hill and , more recently, Knipe Point. An updated Shoreline Management Plan (versions 2) was published in February 2007 and identifies areas of risk from coastal erosion, plotting predicted shorelines as a result of 20, 50 and 100 years coastal erosion. This is in the process of being refreshed and any updates that are available will be used in the assessment of sites.

The NPPF continues to ensure Local Planning Authorities protect against the risks of climate change including coastal change. As the information is readily available any proposals that would fall within the area likely to be subject to coastal erosion within the next 100 years will be dismissed.

5. Flood Risk

Does the site lie within an area considered to be unsuitable due to its position within a flood risk zone (high risk)?

Yes	No
-----	----

Housing Site Methodology

The NPPF, in paragraph 157, retained the risk based and sequential approach for developments in designated flood risk areas. In addition, the Local Planning Authority, is to commission an update to the Strategic Flood Risk Assessment (SFRA) to provide greater detail as to the flood risk within defined areas. The NPPF and its supporting technical guidance define flood risk areas as below:

- Flood Zone 1: Low probability;
- Flood Zone 2: Medium probability.

In addition to the above, Flood Zone 3 is sub-divided into the following:

- Flood Zone 3a: High probability of flooding that should only be used for housing if the exception test is passed;
- Flood Zone 3b: Area at high risk which is currently classed as a functional floodplain.

For the purposes of this housing assessment methodology, the areas identified as being of greatest risk are Flood Risk Zones 3a and 3b.

Any proposals that lie within Flood Risk Zones 3b will be dismissed. Should any proposal fall within Flood Risk Zone 3a such sites will only be carried forward if it is not possible for development to be located in zones of lower risk. Such proposals would be considered an exception and only be considered appropriate if there were clear and identifiable mitigating reasons for development within these areas (for example there were wider sustainable benefits or lower areas of risk were inappropriate due to international, or national designations).

Sites within other flood zone categories are assessed for their suitability and appropriate use of the site in the later stages of the methodology.

Stage 2

6. Brownfield or Greenfield?

Is the site classed as Brownfield or Greenfield?

Brownfield	Majority Brownfield	Majority Greenfield	Greenfield

In considering the effective use of land, paragraph 117 of the NPPF states the Plan should make "as much use as possible of previously-developed or 'brownfield' land".

Although not all brownfield sites will be suitable for housing, this methodology scores such sites higher than proposals for developing on Greenfield land as a consequence of being a more 'effective' use of land as mentioned within NPPF. The definition of brownfield land is that as is contained within the NPPF which states, 'previously-developed land is that which is or was

Housing Site Methodology

occupied by a permanent structure, including the curtilage of the developed land and any associated fixed surface infrastructure'. It should be noted that the curtilage of dwellings is classed as Greenfield.

Local Policy can determine targets and a trajectory for developing on brownfield land. Sites will be scored favourably dependent on the proportion of the development size that is brownfield, therefore, further encouraging sustainable reuse of previously developed land.

7. Accessibility to Services

How accessible is the site to a range of key services and facilities by public transport, walking and cycling?

A key aspect of sustainability is to ensure sites allow access to a range of key services and facilities. This question provides an indication of how accessible a site is to facilities including retail, employment, education facilities and doctors' surgeries. A score for each site will be generated by using the following accessibility criteria based on online resources (the score will be presented in the assessment):

- To retail centres such as the defined town centres of Scarborough, Whitby or Filey in addition to district centres of Eastfield, Falsgrave, Ramshill Road and Hunmanby village centre. In addition, retail centres outside the Borough such as Bridlington and Pickering town centres have been included. The smaller neighbourhood centres of Newlands Parade, Whitby West Parage and Newby Centre have also been included as they provide a range of retail and wider services offering convenient, sustainable living;
- To major employment centres (town centres of Business Parks);
- To major indoor leisure facilities (Scarborough and Whitby Sports Centres, Pickering Pool, Bridlington Sports Centre and East Riding Leisure in Bridlington);
- To public transport interchanges (including train station and the major bus terminals for Scarborough, Whitby and Filey) thus connecting to the wider region;
- To Doctors' Surgeries ⁽²¹⁾;
- To Primary and Secondary Schools.

21 This includes all Doctors' Surgeries and Satellite Surgeries that are available five days a week.

Housing Site Methodology

Destination	Journey time to Destination by Public Transport				
	Less than 15 mins	15 to 30 mins	30 to 45 mins	45 to 60 mins	More than 1 hour
Defined town centres, service centres and neighbourhood centres.	6	4	2	1	0
Major employment centres	6	4	2	1	0
Indoor Sports Centres / Pools	6	4	2	1	0
Primary School	6	4	2	1	0
Secondary School	6	4	2	1	0
GP Surgery	6	4	2	1	0

Table A2 Journey Times to Services by Public Transport

Destination	Walking Distance within			Cycling Distances within		
	500m	1000m	2000m	1.5km	5km	8km
Defined town centres, service centres and neighbourhood centres	6	4	2	3	2	1
Major employment centres	6	4	2	3	2	1
Indoor Sports Centres / Pools	6	4	2	3	2	1
Primary School	6	4	2	3	2	1
Secondary School	6	4	2	3	2	1
GP Surgery	6	4	2	3	2	1
Train Station / Major Bus Interchanges	6	4	2	3	2	1

Table A3 Journey Times to Services (Walking/Cycling)

Cumulative Accessibility Score	
--------------------------------	--

Housing Site Methodology

8. Accessibility to Recreation

How accessible is the site to a range of recreational resources by public transport, walking and cycling?

Similarly to Question 7, this question considers how accessible the site is to areas for leisure and recreation. Access to open space, playing fields or amenity space is important for maintaining active, healthy lifestyles. Indeed, the NPPF in paragraph 96 states "access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities."

The assessment ties in with work into the Council's Green Infrastructure Study and uses the criteria set out relating to access to informal open space, sports pitches and outdoor facilities and play areas. This links closely to the Sustainability Appraisal which seeks to promote development that would assist in the promotion of good mental and physical health. Exercise and recreational opportunities are fundamental to this aim.

The distances used to calculate the accessibility to these facilities directly relate to the stature of the site; for example, it is reasonable that the average resident would walk further for sports pitches than to a toddlers play area.

As with the previous question, a score for each site will be generated by using the following accessibility criteria. The score will be presented in the assessment.

Destination	Within pre-determined range		
	350m (5 mins)	700m (10 mins)	1000m (15 mins)
Informal Open Space for Recreation	1	0	0
Outdoor Sports Pitches and Facilities	3	2	1
Local Children's Play Area	1	0	0
Neighbourhood Children's Play Area	2	1	0
Settlement Level Children's Play Area	3	2	1

Table A4 Proximity to Open Space and Recreation

Cumulative Accessibility Score	
--------------------------------	--

Housing Site Methodology

9. Regional and Local Biodiversity

Would the development of the proposed site affect a regional or local site of biodiversity or geological value or affect any protected species / habitats?

++	+/-	-	--
Features retained, improved or successfully integrated into the development	No negative impact on existing features or where mitigation would allow appropriate development with no impact on biodiversity	Some negative impacts that cannot be entirely mitigated against	Features will not be retained and no mitigation measures can overcome impacts or are possible

The earlier assessment (see Question 2) relates to sites of national and international importance, however, this question considers the impact of development on locally and regionally designated sites including Local Nature Reserves (LNR), Local Geological Sites (LGS) and Sites of Importance for Nature Conservation (SINCs).

Furthermore, in partnership with the Scarborough Biodiversity Action Group, the Council produced and adopted a Biodiversity Action Plan in April 2005 which identified a series of priority habitats and species considered to be important to the Borough. Other areas that play a valuable role in the natural habitat of the Borough are the Esk and Derwent river catchments, whilst the Borough Council continues to assist in the Cayton and Flixton Carrs Wetland Project which aims to provide abundant habitats based around the River Hertford catchment taking advantage of the peaty soils of the eastern end of the Vale of Pickering.

The maintaining of all areas will be sought throughout the process with the aim of integrating all social, economic and environmental benefits. The Council continues to consult its Parks and Countryside Services on such issues.

The Council will work with the North East Yorkshire Ecological Data Centre (NEYEDC) to screen proposed site allocations against potential biodiversity constraints such as those outlined above. Such screening can allow proposed site allocations to be graded according to the number and type of biodiversity constraints against them with this information feeding in to this assessment.

Housing Site Methodology

10. Trees and Hedgerows

Would development affect the features such as trees and hedgerows that are important for wildlife and the natural environment?

++	+/-	-	--
Trees and/or hedgerows can be retained, improved or successfully integrated into the development.	No impact on existing trees and / or hedgerows or mitigation would allow appropriate development with no impact.	Some negative impacts that cannot be entirely mitigated against.	Trees and hedgerows destroyed or damaged. No mitigation measures overcome impacts or are possible.

The Borough has a significant number of protected trees, either under Tree Preservation Order legislation or by the fact that they are situated in a Conservation Area. Where areas of Ancient (semi-natural) woodland and Veteran Trees are not covered by national designation, they should be recognised as locally important because they are a valuable biodiversity resource and once lost cannot be recreated or replaced. The continued protection of these trees is essential in safeguarding the role they play in providing abundant environmental quality and wildlife habitats in addition to supplying enhanced public enjoyment.

In relation to hedgerows, since 1997, hedgerows in the countryside have received protection due to their relative importance in terms of providing a natural habitat for wildlife. Hedgerows have also received some protection under the BAP. Hedgerows have the ability to provide vast migration networks for wildlife and, as such, should be assessed on a wider scale.

Sites where hedgerows and veteran trees can be successfully integrated into development with no loss of wildlife habitat and possible enhancement of features would be deemed favourable.

11. Historic Environment

Would the proposed development affect the historic environment including the setting of an historic asset?

++	+/-	-	--
Development of site will provide opportunities for the enhancement of features and may make a positive contribution to local character and distinctiveness of the historic environment.	Development of site is unlikely to impact on the historic environment. There would be no impact or mitigation would allow features to be retained.	Development of site will likely adversely affect the historic environment. Features may be lost in part.	Development of site is likely to result in significant adverse harm to the historic environment, with features lost and no possible mitigation.

Housing Site Methodology

The impact of the development on the historic environment will take account of the impact on non-Grade I Listed Buildings, Parks and Gardens of Historic Interest; not only on the assets themselves but the setting thereof. Developments that may significantly impact upon Grade I Listed Buildings or nationally important archaeological structures are likely to have been dismissed in Stage 1 of this assessment. Historic sites contribute toward the heritage of an area and it is important to protect and retain, wherever possible, such areas.

This section will also take account of Conservation Areas. These play an intrinsic part in the maintaining of areas that characteristically represent the architectural or historic appearance of the setting in which they are located and should be preserved or enhanced where possible. Further to protection, the NPPF in paragraph 185 also indicates the role new development may play in making a positive contribution to local character and distinctiveness. The integration of any new development either within or adjacent to development that directly or indirectly affects Designated Heritage Assets needs thorough investigation. The Council's Conservation Officer will be consulted upon in relation to developments that have the potential to impact on these areas.

12. Character of Built Area

Would the development affect the built character of the town or village?

++	+	+/-	-	--
Development of site will likely enhance local character and/or sense of place significantly.	Development of site will likely contribute positively local character and/or sense of place (this may be subject to the development providing mitigation measures and/or meeting specific policy requirements).	Development of site likely to have a neutral / negligible effect on local character and sense of place (this may be subject to the development providing mitigation measures and/or meeting specific policy requirements).	Development of site will likely be detrimental to local character and sense of place (regardless of mitigation measures and/or meeting specific policy requirements).	Development of site is likely to result in adverse harm to local character and/or sense of place.

This is more general than the specific impact on Designation Heritage Assets, but refers to the impact on the wider built environment and natural characteristics of the settlement. Impacts could be positive or negative depending on the existing characteristics of the settlement. Positive impacts could be the conversion or replacement of an unsightly building or building on a derelict site. The introduction of new features may improve the wider environment.

Conversely, a development could result in the loss of important open spaces, recreational green spaces or cramming of the environment with inappropriate high density development. A development could also result in the loss of / harm to Non-Designated Heritage Assets which are buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of architectural, historical or cultural significance meriting consideration in the planning process but which do not meet the criteria for Designated Heritage Assets.

Housing Site Methodology

Consideration should be placed on the level of amenity and function on which the area currently provides and whether this can be maintained, replicated, or promoted as a result of development. As such, the consideration of proposals will also assess whether mitigation (e.g. off-site open space or improvements) may compensate for any adverse effects.

An additional aspect to be considered is the success with which the proposed site could integrate with, not only the existing townscape character, but the intrinsic character of the community. The formation of sustainable communities is regarded as an integral characteristic of social sustainability and, therefore, an understanding of how proposed developments may comply with this should be sought. A key notion here is also to assess the opportunities and benefits that new developments may bring to the wider existing community, for instance a proposed site may maintain, promote and enhance the range of local facilities within the area.

13. Impact on the Landscape

What is the capacity of the landscape to accommodate development with respect to the conservation and enhancement of distinctive rural and coastal landscape character areas?

++	+/-	-	--
Development of site would have a positive impact on the landscape, for example, where development could relate well to the landscape or the existing landscape is poor or the site is located within an existing urban environment..	With appropriate mitigation, the site can be developed without impacting on the landscape.	Partial features may be lost and there may be a negative impact on the landscape . Mitigation may lessen any impact but will not overcome all constraints.	Development of site is likely to result in a significant negative impact on the landscape, features may be lost and mitigation will not satisfactorily overcome concerns.

The importance of maintaining and improving landscape diversity is highlighted in the NPPF (Paragraph 170). A landscape character assessment was produced during the preparation of the previous Local Plan and can be used to inform the individual site allocation assessments as it is regarded as being up to date. It describes and classifies the different landscapes in the Borough. For the larger strategic options, the study undertook detailed assessments, whilst for other sites, the assessments will use the wider characterisations used as part of the study as a basis for considering the impact on a site-by-site basis. The Borough incorporates the National Park fringes, the Wolds and Carrs, as well as areas of important coastal landscape importance (Heritage Coast). Where possible these landscapes should be protected from development unless they are shown to have no impact or have a positive impact on the landscape setting.

Rights of Way networks play an intrinsic role in the public enjoyment of such landscape environments and should be safeguarded or improved where possible. New developments within or around Rights of Way networks could have the effect of severance for example, or equally, may provide improved or further links thus meeting needs of accessible greenspace. North Yorkshire County Council's Rights of Way Improvement Plan should be referred to whilst the Borough Council's Parks and Countryside Officers will continue to be consulted upon where developments may have an impact, either positive or negative, on the Rights of Way network.

Housing Site Methodology

14. Flood Risk

Is the proposal within an area at risk of flooding?

++	+/-	--
Zone 1 - Low probability of flooding. Development is appropriate.	Zone 2 - Medium probability of flooding. Development is appropriate subject to any required mitigation.	Site identified as being at high risk due to any additional flooding evidence that cannot be fully mitigated.

Sites that lie within the highest risk flood zones are likely to have been dismissed at stage 1 of the assessment. This assesses the other sites that fall within other flood zones and these comprise:

- Zone 1 - Low probability
- Zone 2 - Medium probability.

The Strategic Flood Risk Assessment will advise on the level of risk identifying the areas which may be more appropriate for development. In addition to this, local knowledge can be utilised to establish further areas where flooding or drainage issues may persist.

15. Agricultural Land

Would development lead to the loss of best and more versatile agricultural land?

++	+/-	--
Site lies within Grade 4 or 5 (Urban)	Site lies within Grade 3	Site lies within Grade 1 or 2

The protection of high quality agricultural land forms an important sustainability consideration. Loss of high grade agricultural land should be avoided, with development being directed to land of a lower grade, unless inconsistent with other sustainability considerations.

Desktop analysis will be undertaken using the national agricultural land classification data to make an estimate about the land classification applying to the majority of the site area. It should be noted that the data is indicative and does not offer a detailed assessment of the agricultural quality of each site.

Housing Site Methodology

16. Water Supply and Source Protection Zones?

Would the development adversely affect a water supply or Source Protection Zone?

++	+/-	--
No impact from development on water supply.	Any impact from development on water supply be successfully mitigated.	Site located within Source Protection Zone and development could pose a serious risk of contamination with no mitigation possible.

Source Protection Zones have been identified by the Environmental Agency within the Borough. They protect aquifers and other groundwater flows used for public drinking water and other abstractions and define areas where if contamination were to happen, would have an impact on the water supply. The closer the development may be located to the aquifer, the greater the risk. These zones are split into:

- Zone 1 (Inner Protection Zone)
- Zone 2 (Outer Protection Zone)
- Zone 3 (Total Catchment).

The impact of any developments within or near to SPZ's will be discussed with the Environment Agency whom may also advise as to required distances and assessments. Where any sites are determined to pose a serious contamination risk to the public drinking water supply, they will be dismissed. Where sites are in close proximity to protection zones mitigation may allow development although significant buffer zones and assessment costs could affect viability.

17. Mineral Resources

Is the site located in an area identified for mineral resources?

++	+/-	--
Site is not within a mineral safeguarding area or any site identified for mineral extraction.	Site is within a mineral safeguarding area although mitigation is likely although will require investigation to establish the potential for extraction of the relevant mineral or Minerals Planning Authority has raised no objection.	Site is within an area identified or allocated for mineral extraction including within including within the emerging Minerals and Waste Joint Plan.

Mineral Safeguarding Areas protect known locations of specific minerals resources of local and national importance, ensuring they are not needlessly sterilised by non-mineral development. Designation of such areas does not carry a presumption that any resources will be worked, nor

Housing Site Methodology

do they preclude other forms of development taking place. Subject to some certain exemptions, non-mineral development will be expected to investigate the potential for extraction of the mineral resource prior to the development taking place.

The Mineral Safeguarding Area buffer zone is proposed in order to ensure that any site assessment considers not only the minerals immediately beneath the site, but also the effect of the development on mineral resources beyond that. Therefore, this ensures the full consideration of any incompatible neighbouring uses and also the protection of residents and other businesses from noise and dust impacts from quarrying.

The assessment will utilise the Minerals and Waste Joint Plan undertaken by North Yorkshire County Council, City of York Council and the North York Moors National Park Authority. At the time of writing, the examination in to the Joint Plan is ongoing with consultation on Main Modifications expected during Summer 2020 ⁽²²⁾.

18. School Capacity

What is the capacity of schools to cope with the development?

++	+	+/-	--
There is sufficient capacity and an increase in pupil numbers is desirable to the school.	There is sufficient capacity in local schools or there is insufficient capacity but if appropriately mitigated could provide overall benefit to the local school.	There is insufficient capacity in local schools but this can be successfully overcome through mitigation.	There is insufficient capacity in local schools and mitigation is unlikely to be possible.

All developments must have adequate access to schooling, whether that be existing schooling, programmed improvements to facilities or additional schools or school places that would be generated by a development. Any proposals that cannot be accommodated in terms of impact on educational facilities and where no solution exists will be dismissed.

The Local Education Authority will be consulted upon regarding the existing status of each school in closest proximity to any particular proposed site, assessing capacity issues and potential for any further expansion in order to accommodate estimated increases in pupil numbers.

There may be occasions where an opportunity exists for an improvement in the facilities of a particular school and this will be reflected in the assessment, however, this must be demonstrated to be a significant improvement and will be in a consultation with the Local Education Authority. Similarly, there may be some schools within the Borough that have seen decreasing pupil numbers to the extent whereby the longer-term future of the school may be at risk. In such

Housing Site Methodology

cases, development within the relevant catchment area may provide an opportunity for an increase in pupils that would safeguard the future of the school. Again, the assessment would be based on consultation with the Local Education Authority.

Where housing proposals are for a specific demographic, for example, retirement facilities, they will not be subject to these criteria.

19. Capacity of Utility Providers

What is the capacity of existing utilities (Water, Sewage, etc) to cope with the development?

++	+/-	-	--
There is sufficient capacity in and development can be accommodated without the need for additional investment in increasing capacity.	Sufficient capacity or constraints can be overcome through, for example, planned growth of housing with investment from utilities provider or the relevant provider has specific plans to increase capacity during the Plan period. Housing development may have to be delayed until the installation of relevant infrastructure.	There is insufficient capacity but this can be overcome with mitigation although no specific planned increase to capacity has been identified.	Insufficient capacity and constraints cannot be overcome; i.e. levels of development do not warrant investment from infrastructure providers to bring current facilities up to spec.

The capacity of infrastructure providers is central to any proposed developments. Capacity issues can be determined from discussions with the individual providers, for example, Yorkshire Water. Where there is no spare capacity and the scale of the proposal would not warrant or justify the investment required to upgrade infrastructure these are likely to be dismissed. Although general capacity levels are location-specific, the capacity will be assessed on a site-by-site basis due to a number of varying factors including site size, thresholds, and previous site uses determining the requirement. In addition, the cumulative impact of development is considered when determining the range of sites. If a scheme is considered of a scale that would warrant and provide the funding to upgrade the infrastructure this would be taken into account.

Housing Site Methodology

20. Local Highway Network

Is the local highway network (local) able to safely and efficiently cope with this development?

++	+/-	-	--
There is sufficient capacity in the local highway network and the site can be accessed safely.	Sufficient capacity exists in the local highway network but some works may be required to enable a safe access in to the site.	There is sufficient capacity but this can be overcome with mitigation.	Insufficient capacity and constraints cannot be overcome; i.e.levels of development do not warrant investment from infrastructure providers to bring current facilities up to spec, and/or a safe access in to the site cannot be formed.

NPPF Paragraph 108 states that in considering sites that may be allocated for development it should be ensured that a "safe and suitable access to the site can be achieved for all users... and any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree."

Where there is likely to be an unacceptable impact on the local network that cannot be mitigated against through improvements, it is likely the site may be dismissed. One such method of mitigation could be through the use of Travel Plans which may help in emphasising the importance and value of influencing individuals travel behaviour towards more sustainable travel modes; the utilisation of these will be considered when assessing such impacts as they could be deemed beneficial in assisting the achieving of wider spatially strategic aims.

Also considered within this subject will be issues regarding achieving a safe and suitable access to the site. In some instances, there may not be a readily available point of access which may affect both the deliverability of the site, and the suitability in terms of where the creation of an access may impact upon surrounding land uses. Furthermore, sites of a larger scale may require secondary or emergency access points which again would require assessment. The comments of North Yorkshire County Council as the Local Highway Authority are crucial in these regards.

It should also be noted the impact on viability of any mitigation works would be considered later, within stage 3 of the assessment.

Housing Site Methodology

21. Strategic Road Network

Does the development have an adverse impact on the Strategic Road Network?

++	--
Development does not negatively impact on the safe and efficient operation of the network or infrastructure improvements to accommodate development are feasible and have a suitable identified funding sources and delivery plan.	Insufficient capacity and constraints cannot be overcome.

There is scope for any development to have an impact on the strategic highway network, in Scarborough's case, the A64. The A64 is described as a 'Core' Trunk Road thus is deemed to be of national strategic importance and also plays a key role in the continued investment and growth of the Scarborough area as it provides vital linkages to the rest of the region.

Highways England will be involved in any assessment of major proposals that could have an impact on the A64 and its operating capacity, ensuring the safe and efficient operation is not jeopardised. In addition, Highways England may identify significant areas of development from which a cumulative impact may have an 'in combination' impact on the A64's strategic importance. Highways England has previously stressed they are unable to provide new or additional capacity to facilitate development, although they could consider the feasibility of improving the A64 between Musham Bank and Dunslow Road. Schemes that will have a significant adverse effect on the A64 and cannot be mitigated against will likely be dismissed.

22. Land Use Conflicts

Would the development of the site be compatible with adjoining land uses (now or in the future) or are there conflict / amenity issues?

++	+	--
Development compatible.	With mitigation, development would be compatible.	Incompatible with adjoining uses and mitigation unlikely to be possible.

It is critical that all development is compatible with its neighbouring uses, both existing and any proposed uses. The degree of success a development has in integrating with its surroundings is a vital component of sustainable development thus helping to ensure the vitality of an area is maintained and, where possible, enhanced.

Suggested considerations include the impact of any development in terms of noise, smell, light and other effects on residential amenity. Adjacent land uses that may pose potential problems could include:

Housing Site Methodology

- Sewage treatment works;
- Livestock uses (intensive);
- Industrial sites;
- Sites that have minimum distance requirements to other development through Health and Safety Executive regulations;
- Electricity pylons;
- Telecommunications Installations;
- Ministry of Defence sites;
- Main Roads.

Conversely, it is important to consider the impact of any proposed residential scheme on the operations of existing adjacent land uses. Guidance ensures that, through the 'agent of change' principle that existing uses will not be required to bring about operational changes to mitigate impact on newer development such as housing. In such cases, it is the opinion that residential development will generally be unsuitable unless mitigation is possible.

In all instances, consultation will progress with relevant bodies such as landowners, the Borough Council's Development Management Officers and any appropriate stakeholders in order to determine any potential conflicting land uses or the requirements of how they may be protected or enhanced through adjacent or nearby new development.

23. Any Other Constraints?

is development of the site possible without being constrained by any other issues and, if so, can these issues be overcome?

++	+	--
There are no known other constraints.	There are other constraints but these can be satisfactorily overcome.	There are other constraints and mitigation is unlikely.

This is a catch-all for other issues that may affect the deliverability of sites. This could include, for example, ransom strips, drainage and runoff, topographical issues or potential contamination issues. Legal problems outside of the control of planning such as covenants can also prevent housing sites being developed and, if possible, should be made clear in any submission with an explanation of how they can be overcome. Sites that cannot overcome such matters will be dismissed as being undeliverable. The detailed assessment of all sites should yield information regarding any such further constraints, and should, therefore be determined on a site-by-site basis.

Housing Site Methodology

24. Land Ownership Constraints

Has the landowner(s) of the site confirmed the site is available for development in the Plan period?

++	+	+/-	--
The site is in single ownership and the site has been made available.	The site is in multiple ownerships and all the parties have confirmed the site is available and are willing to work together to bring the site forward in a consistent manner.	The site is in multiple ownership and is only in partial available.	There are significant issues which restrict the delivery of the site.

The Call for Sites form puts extra emphasis on site submissions outlining clearly any ownership constraints that might apply and when sites are likely to become available for development. Is the site in multiple ownership? If so, has sufficient evidence been submitted to demonstrate the various interested parties are committed to delivering the site together? If not, could the site come forward in smaller portions without affecting the ability of the remainder to be delivered? It should be noted at this stage that planning requirements such as open space contributions and education will be assessed for the full site. Any future submission will be required to make a pro rata contribution if it falls below the usual threshold. In essence, splitting sites will not negate the requirement to mitigate any impacts of the development of the full site.

25. Availability Constraints

Is the site available immediately from the point of adoption of the Local Plan?

++	+	+/-	--
The site is available immediately and there are no issues that require resolution.	The site may be available immediately although there are specific issues that may require resolution prior to delivery.	The site is not expected to be available in the short term but is likely to be available at some point during the Local Plan period.	There are significant issues which are likely to prevent the site being available through the LocalPlan period.

National policy places great importance on the ability to demonstrate a supply of specific available and deliverable sites, sufficient to provide five years' worth of housing against their housing requirements (with an additional buffer to ensure choice and competition in the market for housing).

The call for sites form includes specific questions relating to the availability of a site including an anticipated timescale for delivery and whether any site clearance works may be required prior to availability.

Housing Site Methodology

This question favours sites which are available in the short-term as they would assist in meeting the aforementioned requirement to provide five years' worth of housing, however, a supply of sites over the mid and longer term of the Plan period is also required. Sites are scored based on when they become available. Estimations over delivery timescales relating to build-out rates and timescales for completion will be factored in to housing trajectory calculations.

If it becomes apparent a site is no longer available for development over the Plan period, it will be rejected and will not be allocated in the Local Plan.

26. Viability

Is delivery of the site economically viable having taken account of usual and expected contributions?

++	+	+/-	--
Detailed evidence has been submitted that indicates delivery of the site is viable.	There do not appear to be any specific reasons to suggest delivery of the site would not be viable although no detailed evidence has been submitted,	There are specific issues that would suggest the delivery of the site may be viable but may not be able to fully contribute towards its required contributions.	Delivery of the site is not viable.

Viability is a fundamental aspect of ensuring a site is deliverable. Through the updated NPPF and online planning guidance the Government has placed increased importance on site promoters to demonstrate that sites are viable. Paragraph 57 of the NPPF states that 'Where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable. It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.' This clearly means that viability must be sorted at the Plan stage as only under certain circumstances will any variation to this be allowed at the planning application stage.

Paragraph 67 also states that 'Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.'

It is therefore a requirement of the site submission process for applicants to demonstrate that a site being put forward for allocation can be delivered along with all necessary requirements of planning policy. This includes but may not be restricted to:

- Affordable Housing at the requisite percentage level;
- Contributions towards education;
- Contributions towards health provision;
- Contributions towards either on-site or off-site open space, sports and recreation and play;
- Any off-site highways improvements or mitigation measures.

Housing Site Methodology

Information on affordable housing contributions, education and open space can be found on the Council's website at:

<https://www.scarborough.gov.uk/home/planning/planning-policy/supplementary-planning-documents>

You should also bear in mind upcoming changes in both national planning policy to require more investment in Biodiversity Net Gain on housing sites and the proposed changes to building regulations to require a higher efficiency of building construction (through Part L of the Building Regulations).

To calculate this you will need to take into account the cost of development including a realistic land value and the expected returns for the sale of properties.

Clarification that a site can deliver the above will weigh in favour of the submission. Please note though, as stated in Paragraph 57 of the NPPF that once a site is allocated under these requirements it will only be in the most exceptional circumstances that any of the above will be varied at the planning stage.

If you need assistance with this matter we can provide some limited guidance, however, it may be necessary to seek the involvement of a professional valuer.

27. Estimated Timescale for Delivery

When is the site expected to be completed or partially completed?

Possible Scores	0-5 Years	6-10 Years	11-15 Years	Post Plan
-----------------	-----------	------------	-------------	-----------

This will be primarily informed by the outcome of the other parts of this assessment. It is important the allocation process identifies sufficient sites to meet its housing requirement both within an initial 5 year period and to maintain a rolling 5 year supply of sites. As such, it may be that sites that can come forward later on in the Local Plan period can still play an important role in maintaining sufficient housing land supply.

28. Yield

What level of housing will the site deliver?

Yields are estimated by a number of methods. Where specific knowledge or officers' expertise could be utilised, an estimated figure is given. There may be instances where indicative plans submitted as supporting information could also be used. Where this may not be the case, a density multiplier may be used such as with calculations contained within the Strategic Housing

Housing Site Methodology

and Employment Land Availability Assessment. In the assessment, the yield will be presented within the 'Score' column with the 'Commentary' column used to outline how the yield has been derived, i.e. whether a density calculation has been used.

Concluding Comments

Each assessment is completed with a summary paragraph outlining any headline issues including any issue that may impact on the deliverability of the site or any specific viability issues that may be applicable.



Scarborough Borough Council
Planning Services
Town Hall
St Nicholas Street
Scarborough
North Yorkshire
Yo11 2HG

T: 01723 232480

E: localplan@scarborough.gov.uk

W: www.scarborough.gov.uk/localplan

Follow us on Twitter @SBCLocalPlan