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**Sent by email only**

23/06/2016

Dear Sir,

### **Scarborough Local Plan: Response to issues raised during Proposed Submission Stage**

1. Thank you for consulting with the Home Builders Federation (HBF) on the proposed pre-examination modifications to the Scarborough Local Plan. It is recognised that these changes are made in response to comments made at the submission stage of the Local Plan. I can confirm that the HBF still wishes to attend the examination to debate these and other matters further, as appropriate.
2. The HBF is the principal representative body of the house building industry in England and Wales and our representations reflect the views of our membership of multinational PLCs, through regional developers to small, local builders. Our members account for over 80% of all new housing built in England and Wales in any one year including a large proportion of the new affordable housing stock.

#### **Proposed Main Modifications**

3. The following comments relate to the 'Proposed Main Modifications' document (examination ref: EX-8R (MM)).

#### **Main Modification SBLP-MM\_001 (Paragraph 1.1)**

4. The HBF supports the identification of the start date of the plan, this aids clarity.

#### **Main Modification SBLP- MM\_005 (Policy DEC1, criterion b)**

5. The removal of the word 'more' is supported and partially addresses our concerns in relation to Policy DEC1. We would, however, recommend for clarity and certainty our suggested amendment within our comments upon the submitted plan be incorporated. The wording suggested was;

*“...that the layout, orientation and design of buildings (where these factors are not otherwise constrained) helps to reduce the need for energy consumption; and, how buildings have been made more energy efficient thereby reducing carbon emissions from development;...”*

6. This would reduce any ambiguity and ensure additional energy efficiency requirements which seek to go beyond Part L of the Building Regulations are not required.

**Main Modification SBLP-MM\_007 (Policy HC1)**

7. The inclusion of the words ‘net additional’ are supported and provide additional clarity to the policy.

**Main Modification SBLP-MM\_009 (paragraph 6.14)**

8. The additional wording is considered useful but does not overcome our fundamental concerns set out against Policy HC2, particularly regarding the lack of sufficient allocations to provide flexibility and choice.

**Main Modification SBLP-MM\_013 (Policy HC2)**

9. The clarification is considered useful but does not overcome our fundamental concerns set out against Policy HC2, particularly regarding the lack of sufficient allocations to provide flexibility and choice. Indeed it appears that this adds further weight to our argument. The HBF is also keen to see further information and evidence relating to the delivery rates at the strategic site.

**Main Modification SBLP-MM\_016 (Policy HC2)**

10. The clarification is considered useful but does not overcome our fundamental concerns set out against Policy HC2, particularly regarding the lack of sufficient allocations to provide flexibility and choice. Indeed it appears that this adds further weight to our argument.

**Main Modification SBLP-MM\_017 (Policy HC5)**

11. The HBF supports the removal of the reference to Lifetime Homes, this is consistent with our comments upon the submission version of the plan. The need for part ‘d’ even as revised is still queried given the presence of Policy HC6.

**Main Modification SBLP-MM\_018 (Policy HC6)**

12. The HBF supports the removal of the requirement that "...all units should be designed to be wheelchair accessible or readily adaptable". This proposed change would overcome our objection to this policy.

**Proposed Additional Modifications**

13. The following comments relate to the 'Proposed Additional Modifications (Minor)' document (examination ref: EX-8R (AM)).

**Additional Modification SBLP-AM\_015 (paragraph 6.55)**

14. The HBF supports the removal of reference to Lifetime Homes.

**Additional Modification SBLP-AM\_023 (Paragraph 7.18)**

15. The inclusion of the additional sentence to paragraph 7.18 is supported, although this should not be solely related to the borough as this places an artificial boundary on such schemes. Dependent upon the site, location and operational requirements of the company it may be equally applicable to residents of adjoining or nearby authorities.

**Information**

16. I would be happy to discuss any of the above comments in greater detail prior to the formal commencement of the examination hearing sessions.

Yours sincerely,



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