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30/08/2016

Dear Mr Wilson,

Scarborough Local Plan: Response to Examination Document EX-14R(A to E)

Thank you for consulting the Home Builders Federation (HBF) on the proposed modifications to the Scarborough Local Plan set out within examination documents EX-14R(A): South Cayton SGA1 Modifications, EX-14R(B): Considering Housing Proposals Outside Development Limits (in Absence of a Five Year Supply), EX-14R(C): Additional Housing Allocations, EX-14R(D): Addendum to Housing Trajectory and EX-14R(E): Housing Trajectory. It is understood that these modifications are made in relation to the Inspector's Interim Findings in relation to Matters 2 and 3 (examination ref: EX-14).

EX-14R(A)

The HBF does not wish to make any comments upon these proposed modifications.

EX-14R(B)

The HBF is generally supportive of the proposed modifications set out by the Council. These will provide greater flexibility to the plan enabling it to deal with changing circumstances. This accords with the provisions of the NPPF, particularly paragraph 14. The HBF also agrees with the Council's conclusion that it is appropriate the mechanism be included as a modification to existing policy HC1. This should ensure that the modification is given appropriate weight within the decision making process.

Whilst the HBF supports the inclusion of this policy it does not negate the need to identify a deliverable five year housing land supply or a relevant buffer of sites to ensure that the plan delivers against its housing requirement in full. Our comments upon these matters are included within our original comments upon the submission version of the plan and matter 2 hearing statement (examination ref: WS-757414). This is discussed further in relation to examination documents EX-14R(C), EX-14R(D) and EX-14R(E) below.

The proposed amendments to paragraph 6.22 of the plan indicate “*Should there be persistent and significant under delivery then a partial review of the housing chapter would be instigated.*” Whilst this is supported it is considered to lack clarity and certainty. The HBF consider that a more effective statement would identify what is meant by persistent and significant under-delivery, taking account of the proposed amendments to policy HC1. This could include under-delivery by more than 20% against the trajectory and / or under-delivery for three or more consecutive years.

EX-14R(C)

Whilst the HBF does not wish to comment upon the acceptability of individual sites we are supportive of the plan including additional and expanded sites. In combination the Council anticipates that these sites will add an additional 380 dwellings to the overall supply.

These sites are anticipated, by the Council, to provide additional supply within the first five years of the plan. Once again this is supported and considered necessary, we discuss this issue in greater detail against examination documents EX-14R(D) and EX-14R(E) below.

EX-14R(D) and EX-14R(E)

The amended trajectory identifies a total supply of 10,663 dwellings over the plan period, excluding windfalls¹. This would create a buffer of 1,213 dwellings or 13% above the proposed plan requirement of 9,450 or 982 dwellings or 10% above the submitted plan requirement. Whilst this additional capacity is supported it is noted that the size of the buffer remains below the recommendations of the Local Plans Expert Group, who recommend a buffer of 20%².

In terms of the additional and expanded sites identified in EX-14R(C) it is noted that sites HA28, HA35 and HA36 are supported by submissions upon delivery and build rates made on behalf of the relevant landowners and / or developer. This is considered appropriate. It is, however, unclear what, if any, information the Council has based its increase in the contribution towards the five year supply from site HA30 (40 units).

In terms of the five year supply the HBF has not undertaken a thorough assessment of all sites. We do, however, query the inclusion of proposed allocations HA11, HA12,

¹ As agreed at the Matter 3 hearing session

² Local Plans Expert Group (March 2016): Report to the Communities Secretary and to the Minister of Housing and Planning, Chapter 11.

HA15 and HA16 as it is understood none of these allocations benefit from either a submitted application or direct developer interest. We previously raised this issue within our matter 3 hearing statement. Unless the Council has alternative evidence it appears unlikely these sites will deliver within the first five years of the plan.

The HBF supports the amendments to the delivery of Middle Deepdale as this reflects the evidence presented at the examination hearing sessions. We also support the 'pushing back' beyond the five year supply of the Whitby Hospital Site, this accords with the comments in our matter 3 hearing statement, although we do query the reality of delivery in year 6. It is, however, notable that no change has been made to the other 'Known Sources of Housing' site noted in our matter 3 hearing statement, Filey Road Sports Centre. The HBF understands this site does not yet benefit from permission and the 2016 SHELAA does not provide comfort that it is truly available now as required by footnote 11 to NPPF paragraph 47.

The Council's amendments suggest a further 206 units will be added to the five year supply. Our observations do, however, query the reality of 145 units coming forward, as set out in the table below. In addition the HBF is unclear on the additional 40 units at HA30. The Council may wish to provide additional evidence.

Site reference	Council's anticipated delivery in first five years
HA11	55
HA12	20
HA15	40
HA16	10
HA30	40
Filey Road Sports Centre	20
Total	185

Information

I would be happy to discuss any of the above comments in greater detail prior to the formal commencement of any main modifications consultation.

Yours sincerely,



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