

Forward Planning
Scarborough Borough Council
Town Hall
St Nicholas Street
Scarborough
YO11 2HG
Email: localplan@scarborough.gov.uk

02/11/2016

Dear Sir / Madam,

Scarborough Local Plan: Main Modifications

Thank you for consulting the Home Builders Federation (HBF) on the proposed main modifications to the Scarborough Local Plan set out within examination document PM01: Main Modifications for the Local Plan – Consultation. We would like to make the following comments.

Modification Number: SBLP-MM_001

The HBF supports the inclusion of a start date this provides greater clarity.

Modification Number: SBLP-MM_005

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;...”

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.

Modification Number: SBLP-MM_006

The modification is considered unsound as it is not justified or consistent with national policy.

Despite the proposed changes to the policy, which are welcome and an improvement upon the submitted plan, its requirements are still considered overly onerous. An

element of flexibility would overcome our concerns and make the policy compliant with the NPPF, paragraph 35. We recommend the following wording;

*“Every new residential property which has a garage and or dedicated marked out residential car parking space within its curtilage should include an electrical socket suitable for charging electric vehicles, **where practical.**”*

Modification Number: SBLP-MM_008

The HBF does not support the, albeit slight, reduction in the housing requirement from 9,681 to 9,450 dwellings. Our reasoning for this is set out within our Matter 2 Examination Hearing Statement (examination ref: WS-757414) we do, however, note the Inspector’s Interim Findings upon this matter (examination ref: EX-14).

In terms of the other amendments within SBLP-MM_008 the HBF is supportive of the identification of the housing requirement as a ‘net’ figure. The HBF is also supportive of the greater flexibility provided by the additional paragraph. This is considered to accord with the provisions of the NPPF, particularly paragraph 14. Whilst the HBF supports the inclusion of this additional flexibility 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).

Modification Number: SBLP-MM_009

The HBF supports the inclusion of the additional text upon second/holiday homes in paragraph 6.11. This provides greater clarity to the plan.

The proposed amendments to new paragraph 6.23 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 lacks 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.

Modification Number: SBLP-MM_020

The HBF supports the proposed amendment which provides greater clarity to the plan. 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 which will aid flexibility. We do still, however, have concerns over the level of flexibility shown within the plan and the Council's ability to demonstrate a five year housing land supply. These concerns, taking into account the proposed amendments, are set out within examination document EX-14R (HBF).

Modification Number: SBLP-MM_022

The HBF supports the reductions in the targets for affordable housing contributions, this accords with our previous comments upon this issue, at pre-submission and within our matter 5 hearing statement. It is also noted a reduction is supported by evidence within the Council's *Local Plan Viability Report* (examination ref: CD-14).

The references to the vacant building credit and starter homes are also supported.

Modification Number: SBLP-MM_023

The HBF supports the deletion of Policy HC5.

Modification Number: SBLP-MM_024

The HBF supports the deletion identified within this modification. This is consistent with our earlier comments upon the pre-submission plan and would overcome our objection made upon the submission version of the plan.

Information

I would be happy to discuss any of the above comments in greater detail. The HBF would like to be involved in further hearing sessions if considered relevant and necessary.

We would also like to be informed of the following;

- Publication of the inspectors' recommendations
- Adoption of the Local Plan

Yours sincerely,



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