



**Submission to the
Review of the Scarborough Borough Local Plan 2011-2032**

3rd October 2020

Whitby Civic Society welcomes the opportunity to comment on the Review of the Scarborough Borough Local Plan 2011-2032. The review covers many of the issues that will need to be addressed as the housing and business needs of the Borough are tackled over the next decade. However, we believe that past iterations of the Plan have not always paid sufficient attention to the distinctive needs of our part of the Borough, and our comments are primarily intended to suggest ways in which the Local Plan can meet the particular conditions and requirements of Whitby and its people.

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.

- Option 4

Housing Requirement Option 43

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.

Comment: We broadly favour Option 3 but only if there are clearly identified constraints ensuring a high proportion of housing for local principal residence, with limits on second/holiday homes. Otherwise it is difficult to see any target3 being both realistic and capable of making any impact on housing need in Whitby.

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.

Comment: The criteria should include accessibility to key services. This is particularly significant with the centralisation of local critical care services.

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.

Comment: Site allocation should be based on availability and suitability, regardless of location. Given the constraints, it seems most unlikely that a target of 10% of housing on small sites could be met in Whitby.

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)

Comment:

In Whitby the key goals should be to ensure homes are built for local affordable occupancy, while keeping the town centre viable throughout the year.

This will require a balance between rented (including both social or affordable) homes, shared ownership schemes that are affordable, and affordable first homes, together with an insistence on building for principal residence.

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 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?

Comment: We believe that the revised plan should reflect local housing needs. In an area where local families are often priced out by owners of holiday lets and second homes, this should include 2/3 bed affordable homes. In a town with an above average population of older single adults, it should include homes such as flats that are 1 bed with separate lounge and kitchen facilities. Homes that are flexible enough to provide access for carers should form part of the mix.

While the mix could include some bungalows, space constraints will mean that the number of these are limited.

Flats, if used for principal residences (and not second home/holiday lets) can be particularly important for homeworkers and older independent living but recent experience suggests that they need more effective regulation of leasehold charges.

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?

Comment: SBC has declared a Climate Emergency, and housing policy should reflect that. We recommend that the authority should – bring in Future Homes Standard 2025 immediately (incidentally, we note that products will be cheaper when bought in bulk).

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.

Comment: We believe that all new homes (100%, including holiday lets and second homes) should be accessible to level M4(2). In the case of private housing 10% should be to level M4(3), rising to 25% in social housing. This is essential in a town with an above average aging population. We have specified that holiday lets and second homes be included because of the possibility of reconversion to principal residence.

Question 8

Other Accessibility Measures

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

Comment: All new or redeveloped buildings for public use, whether privately or publicly operated, must be wheelchair accessible.

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.

Comment: The Local Plan should set space standards to meet local needs for principal accommodation, treating the Nationally Described Space Standards as a minimum. This principle should apply to conversions as well as new builds, and should cover holiday lets and second homes, given the possibility of reconversion to principal residence.

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?

Comment: We agree that the Local Plan should improve upon the mandatory minimum efficiency levels. Particularly in the case of Whitby, this will help to reduce dependency on the Esk as a main water source and also reduce pressure on an aging drainage system.

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.

Add Comment: Self-build can help improve affordability and can contribute to a diversity of housing reflecting people's varying needs. At the same time, it must not serve as a loophole permitting poor quality housing. Our general preference is for Option 2, combined with active encouragement to community trusts as well as individuals to take part.

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?

Comment: If a 10% net gain in biodiversity is not made mandatory, the Council should still treat this requirement as a minimum standard. Specific measures to consider include greater use of green corridors; the Council should also consider making use of its own in-house expertise when considering planning advice and decisions.

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?

Comment: We support the proposed requirement for developers to contribute towards tree-planting initiatives; trees can contribute to well-being as well as towards climate change adaptation, but their contribution to carbon mitigation is inevitably limited.

Rather than focusing on carbon offsetting, we would prefer to see our Borough putting energy efficiency at the heart of sustainable development. Other measures, such as carbon capture and recycling, can play an important supporting role, but energy efficiency will help deliver significant reduction in carbon emissions.

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. The following is the existing statement for 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

Add Comment: Whitby

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

Comment: We suggest the following wording:

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

- **Geology, Topography, setting and views:**

- high intervisibility within the town (views across the River Esk) and visual prominence from the surrounding area

- "amphitheatre" created by the estuary viewed from high level bridge and Abbey Plain/GI listed buildings

- public views of tumbling roofscapes emphasising the Town's topography

- narrow twisting roads, footpaths, and steps, with stone and brick boundary walls

- **Strong built heritage and relationship with both the River Esk and the North Sea:**

- compact town centre built around the harbour, with the Medieval street layout still visible, and many plots forming "Yards" that are characteristic of the old town

- clarity of various periods of growth of the Town reflected in the tight-knit cheek by jowl present-day townscape, resulting in a mix of character and architectural styles

- **Whitby buildings exhibit various characteristics styles:**

- perhaps the most noticeable are the windows of Whitby with their mix of composite sashes, bottle windows, and triangular bay windows

- the town has a variety of distinctive building types including vernacular cottages, town houses, grand commercial premises, terraces of late C19 houses (of particular note being the Georgian townhouses in Bagdale and St. Hilda's Terrace) and good shop fronts

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

Whitby is a compact historic town possessing many historic buildings and large churches, with the Abbey viewable from most points, built around a harbour, between the sea and the moors

- How has new development influenced the character of the place where you live?

Infill buildings and hard landscaping of gardens for parking in Whitby have removed much of the little green space left in the Conservation Area. The conversion of boarding houses & hotels into apartments, combined with a marked shift towards town centre residential

accommodation being used as holiday cottages/second homes, has led to a deterioration in public and green spaces and lack of a community feel, and intensified parking problems. Newer sprawling out of town developments have seen little thought given to design or infrastructure. The town's distinctive views are continuing to be lost with poorly designed buildings and huts surrounding the harbour, very much affecting the "amphitheatre" effect. While town centre retail has been vibrant right up until the pandemic, it has been increasingly balanced towards the tourist economy.

- Are there any examples of recent developments in the Borough you consider to be "well designed"?

Whitby has a number of recent positive developments. The infill cottages on Cliff Street and Henrietta Street fit in well with Conservation area/listed buildings. Spa Well Court houses are visually pleasing however development let down by block of flats facing back of Broomfield Terrace and the Spa Well, also missed opportunity to provide community recycling scheme. We have recently awarded Certificates of Excellence to two buildings along Church Street (Hoggarth's Yard and the Old Gasworks) that combine new uses with sympathetic development. Whitby Business Park is low-rise and well-planted. The St Hilda Business Centre is an example of a sympathetic repurposing of a historic building. Parts of the Scoresby Park estate are highly attractive, with varied types of housing, wide verges, wild flower planting, and a community space in the centre; unfortunately, this is not repeated throughout the estate.

- 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?

Whitby benefits most from a balance between design that is sympathetic to traditional forms and more contemporary designs. So far as the historic town centre is concerned, Whitby Civic Society has undertaken considerable work to raise public awareness of the Conservation Area and to promote design that is sympathetic to the area (<https://www.whitbycivicsociety.org.uk/publications/whitby-conservation-area/>). We believe that so far as the larger scale new developments are concerned, better standards of design are than has been the case in some recent examples (notably the Castle Fields development at Sneaton). Developments should also take into account the demographic needs of the town, which has an older population than the borough as a whole (implying new housing to meet the needs of those with disabilities) and a shortage of homes for families as a principal residence.

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?

Comment: In stark contrast to some other parts of the Borough, Whitby's town centre retail sector before the pandemic was thriving. This overall vitality, though, was accompanied by a changing retail balance, with an increasing focus on the visitor market and a sharp reduction in shops aimed at residents. New supermarkets on the edge of the town mean that large numbers of residents no longer shop in the centre. Further, much of the old town has increasingly become a centre for drinking, with associated levels of anti-social behaviour that further help to drive local residents out of the area. Most recently, COVID-19 has also led to Town Centre being a no-go area for locals due to the lack of social distancing.

We believe that Whitby would benefit from consolidating the retail offer in the town centre. This should be supported by a full rethink of traffic use, with increased pedestrianisation (and enforcement) in the central area accompanied by better local transport for the elderly, disabled, and the young. However, we also need smaller corner shop retail units in new housing estates to help reduce traffic, and provide a stronger sense of community.

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?

Yes. However, allocating sites for housing alone will not contribute to improvements unless there are restrictions on second homes and holiday lets, with new accommodation being designated solely for principal residence.

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?

In the case of Whitby, better out of Town Park & Ride facilities could help release land around the harbour for leisure/outdoor dining. Better use of historic buildings which could make ideal community workspaces for micro businesses/training/markets will help bring a more varied economy back into the town centre. Whitby's centre is currently characterised by a large number of hot food takeaways, which contribute to health problems, generate litter, and attract vermin. Town centre tourism would benefit from more varied indoor entertainment for wet /poor weather days, as well as from improved late-night public transport. Complementary uses such as residential can also be important in supporting the vitality of town centres.

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?
No comment

- Should additional land be allocated in the south of the Borough at Hunmanby Industrial Estate? [No comment](#)
- Have you any other comments or suggestions in relation to employment sites and/or the economy?

In order to help diversify the economy and reduce over-dependence on tourism, we would like to see additional spaces for start-up businesses in Town Centres. We also note that Whitby business park has seen a creeping shift towards retail; while we recognise the need for retail facilities for a growing population, we would like to see a greater focus in future on employment uses, but with limits on class B8 uses which tend to generate few, poor quality jobs.

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?
[Yes, but opportunities for skill development in Whitby are severely limited. The definition of 'local' matters: we believe that the definition should be based on residence within a defined distance from the centre of Whitby.](#)
- 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.
[The threshold should be set as low as practically possible, and certainly no larger than 25.](#)

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?
[Yes – both on number and location. The hot food takeaway industry is highly popular in Whitby, but is clearly problematic in terms of crowding, litter and vermin, and it is not compatible with the Authority's policies for improving public health. We would like to see hot food takeaways encouraged to move into a food market area with seating options, and with a greater variety of choice, aiming at a younger, more health-conscious consumer.](#)

[The authority should require all hot food takeaways to provide biodegradable containers.](#)

- Should we identify locations for new/expanded allotments?
In Whitby, demand for existing allotments is unfortunately limited, as a result of population aging and the changing location of housing for permanent residents. New approaches are needed to encourage community gardening developments with options for 'community orchards' and small-scale food growing 'planters', with seating for mental health and wellbeing, located close to where people now live.
- Should we require 'street trees' to be provided within new housing developments?

Yes, and also in redeveloped areas, in view of robust evidence of the beneficial impact of trees on mental well-being.

- What other measures to promote healthy communities should we explore through this Local Plan review?
Whitby would benefit from more footpaths and cycle tracks linking the town centre, schools, and leisure facilities, as well as from pedestrianisation measures to reduce vehicle pollution and congestion, along with more green spaces in the centre.

Question 19

Any Other Matters Raised

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

A full review of infrastructure requirements for Whitby is urgently needed particularly for roads and paths, plus out of Whitby parking facilities. Roads in Whitby's Conservation Area are not built for two-way traffic plus parking; looking forward, a new approach will be required in order to meet the demands of social distancing as well as government policies for street cafes and furniture, and a steady rise in the number of mobility scooters, wheelchairs and pushchairs.

The most recent Authority Monitoring Report suggests that Whitby has limited future capacity for the delivery of employment uses. We believe that the town has gone beyond saturation in tourism accommodation; while the AMR expresses concern at the possible loss of tourism as a result of pressures to convert from tourism to residential uses, the opposite is the case in Whitby, where the authority should adopt a strong position on development for principal residence.

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:

- the delivery of affordable housing - **1**
- 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) - **4**
- the provision of accessible, adaptable and wheelchair accessible homes - **2**
- the need to be more energy efficient in terms of future energy requirements and construction – **3**
- the need to be more water efficient - **5**
- implementing carbon offsetting measures such as tree planting and natural habitat creation – **no ranking**
- providing construction jobs to local people - **6**

Comment: We do not accept the premise of the carbon offsetting option. Well-designed new energy efficient developments should not require carbon offsetting.

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

We cannot emphasise enough that Whitby desperately needs new housing for principal occupancy. We urge the Authority to follow the example of the North York Moors National Park in adopting suitable policies to promote this.