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Dear David

**Scarborough Borough Local Development Framework: Core Strategy:
Preferred Options September 2006**

The Yorkshire and Humber Assembly welcomes the opportunity to comment on the Scarborough Core Strategy: Preferred Options and to continue its involvement in the development of a coherent spatial planning framework for the region. The comments offered in this letter are intended to be within the spirit of continued and productive joint working.

At this stage, the Assembly's response to the consultation document is a set of officer comments. The aim is to highlight where issues related to general conformity with the Regional Spatial Strategy might arise. When the Core Strategy is submitted to the Secretary of State a formal Assembly view on its general conformity with the Regional Spatial Strategy will need to be given.

The following officer comments are made in relation to the existing Regional Spatial Strategy for Yorkshire & the Humber (based on the selective review of RPG12 issued in December 2004) and the Draft Regional Spatial Strategy – the Yorkshire and Humber Plan (submitted to the Secretary of State in December 2005).

The comments place emphasis on the draft Regional Spatial Strategy (RSS), which reinforces and develops the general thrust of existing RSS; furthermore it is more up to date and has significant "weight" in its own right. Prior to adoption (expected late 2007),

the weight attached to the draft RSS will increase once the Panel's Report is received (expected early 2007) and also when proposed changes are published (expected Summer 2007).

Regional Spatial Strategy

As you know, the Planning and Compulsory Purchase Act 2004 introduced mechanisms to help ensure that DPDs drawn up by local authorities as part of the Local Development Framework are in general conformity with the Regional Spatial Strategy (RSS). The intention is to ensure that DPDs are contributing to the delivery of the RSS and that the two strands of the Development Plan for an area (the RSS and DPDs) are mutually supportive and not in conflict.

It will be important in the submitted Core Strategy to highlight the need for there to be 'general conformity' between the RSS and the Core Strategy, to ensure that the two strands of the development plan are mutually supportive. We therefore think it would be helpful if this need for general conformity were set out at the start of the Core Strategy as this demonstrates the need for a strong link between the LDF and the RSS and will help to clarify the significance of the references to the RSS that are made throughout the document. We welcome the reference to the Regional Spatial Strategy in Appendix 1 and the explanations of the relationships between the Core Strategy and other development plan documents. However it is felt the reference to the RSS would be better placed at the start of the Core Strategy.

The aim of existing RSS (December 2004) is to guide development to sustainable locations and to focus development in main urban areas, market and coalfield towns (Policy P1). This key strategic approach is reinforced in the Yorkshire and Humber Plan (Draft RSS December 2005), which is more specific about the desired location of development in Policies YH1 to 9. These clearly provide a policy context and direction that emphasises the need to concentrate development in Regional and Sub-Regional Centres (including Scarborough), provide for sufficient development in Principal Service Centres (including Whitby) for them to fulfil their important role and to allow limited development in Local Service Centres (identified as Filey and Hunmanby), primarily to meet local need for affordable housing and to enable economic diversification.

In order for the Core Strategy to more clearly reflect the Regional Spatial Strategy set out in both current RSS (December 2004) and draft RSS (Yorkshire and Humber Plan – December 2005), it is suggested that the following issues should be taken into account in the next stages of the Strategy's development.

Overall Vision and Spatial Objectives

There is clearly a strong link between the overall vision and spatial objectives for the Local Development Framework that are set out in the Core Strategy, and with both the current and draft Regional Spatial Strategies. We suggest, however, that it would be helpful to include a further spatial objective with regard to the need for travel, for example:

"To locate development such that the need for travel is minimised and to promote the use of public transport where travel is necessary."

To avoid confusion, it may be helpful if reference in the vision to Scarborough, Whitby and Filey as 'principal centres' was altered in order to clarify the fact that there are differences between these (and other smaller) settlements, as has been done for the spatial objectives. It is also unclear why Hunmanby has not been mentioned in the vision.

Spatial Strategy & Core Policy 1

We support the spatial objectives outlined in paragraph 4.4 and feel they are consistent with both the current and draft RSS.

In reflecting both current and draft RSS, we support the emphasis placed on Scarborough as the main focus of development within the District and as the 'coastal capital'. It is pleasing to see that Whitby has been identified as a Principle Service Centre and that the need to restrict development to protect the historic setting of the town is recognised.

It is apparent that RSS policies have been reflected in the principles for both Filey and Hunmanby and we understand the need to identify service villages to further meet local needs. We do not feel, however, that there is a need to identify non-service villages in the Core Strategy, and suggest that these settlements would be more appropriately categorised within the 'Wider Countryside'.

The Spatial Strategy contains principles for each of the settlement types within supporting text (i.e. paragraphs 4.14, 4.20, 4.26, 4.30, 4.32 and 4.34). We feel it would be helpful if these principles were to be included as part of Core Policy 1. In addition, we suggest that a further principle be included for Whitby, which focuses on improving its functionality as a town, including improvements to the accessibility of the town centre.

We also suggest that Core Policy 3 and paragraph 5.10 (a-e) should be incorporated into Core Policy 1, which would subsequently provide guidance for all settlement types within the Borough.

Core Policy 2 – Delivering Sustainable Development

Core Policy 2 a) states that in order to further achieve sustainable development principles, proposals will be expected to make efficient use of land and infrastructure, including making use of previously developed land in preference to Greenfield sites. We feel, however, that further detail needs to be provided with regards to the location of development. We suggest that Core Policy 2(a) be developed further to provide a more robust sequential test, as has been set out in Policy P1 of current RSS and YH8 of draft RSS.

It is pleasing to see the issue of renewable energy covered. Current RSS Policy R12 provides sub-regional renewable energy targets, which have been taken forward into district targets in draft RSS Policy ENV5 (and Table 15.12). The district target for Scarborough in the draft Plan is 5.2 MW to 2010. We feel it would be helpful if the Core Strategy provided explicit reference to these figures and also provided a stronger emphasis on actually achieving these targets, rather than "contributing towards" achieving them. We are pleased to see that the Core Strategy already refers to the need to ensure

that 10% of energy to be used in sizeable developments comes from on site renewables (draft RSS Policy ENV5 B (iii)).

Core Policy 3 – Development in the Countryside

As suggested previously, we feel it would be beneficial if this policy were incorporated in Core Policy 1, along with the explanatory text contained in paragraph 5.10. It was also suggested that the principles for this policy were extended to cover the 'non-service' villages, which we feel would be a more appropriate approach.

Core Policy 4 – The Built Environment

No comments to add.

Core Policy 5 – Biodiversity and the Natural Environment

The Assembly feels that this policy would benefit from being more spatially specific, by identifying the special characteristics of the Borough and any specific areas to be safeguarded. We feel this policy could be strengthened to better reflect the approach taken in draft RSS Policy ENV8, which identifies regionally distinctive elements of the natural environment, several of which are relevant for the Scarborough District.

Core Policy 6 – Meeting Housing Need

The Assembly welcomes reference to the housing targets of draft RSS. It would be helpful to also include a reference to the work recently undertaken across the region into provision of sites for Gypsies and Travellers. Policy H5 of draft RSS identifies the need for local authorities to undertake a local assessment of the housing needs of Gypsies and Travellers, the results of which should feed into the preparation of local development frameworks. In particular, the role of rural exception sites in delivering this provision is a relevant consideration in the Scarborough District.

Core Policy 7 – Sustaining the Economy

There is no reference or mention to employment land reviews in the Core Strategy, although we understand that an employment land review has recently been undertaken. The RSS establishes a context and methodology for local planning authorities to undertake employment land reviews. The draft RSS does not include targets for the provision of employment land but gives an indicative employment land forecast (the change in total employment land in use 2006 – 2016) in table 14.6. This is 2 - 12ha for Scarborough.

Core Policy 7 could be strengthened by citing the approach to employment land reviews set out in existing and draft RSS (Policy E3 B) including the commitment to reallocate (or potentially deallocate) employment land found to be unsuitable for modern economic uses or in unsustainable locations. Table 14.8 of draft RSS suggests that an employment land review in the district should reflect "...the focus on Scarborough for strategic economic development in the coastal sub area [and] There will be increasing demand from local expansions and inward investment for general employment sites".

It is also suggested that a greater emphasis should be placed on improving skills to help economic restructuring and diversification of the local economy.

Policy E6 of both current and draft RSS provides a framework for tourism in the region and promotes the principles of sustainable tourism, which are particularly relevant for development of the Scarborough district. We suggest that more should be included in the Core Strategy on the spatial priorities for encouraging sustainable tourism in the Borough.

Core Policy 8 – Increasing Accessibility

The Assembly feels that there is a need for a greater emphasis to be placed on public transport in Core Policy 8, as reducing car use is a key theme of the RSS. This is explored further in policies T2 and T3 of current RSS and YH8 C, T1, and T3 of draft RSS.

The Core Strategy promotes proposals for major new tourism, yet surprisingly Core Policy 8 does not make a link between travel and tourism. Both the current and draft RSS (policies T8 and T5, respectively) promote accessibility to main tourist destinations, particularly the National Parks, coastal resorts and urban centres through more sustainable modes of transport.

in Core Policy 8. The current RSS (policy T7) and the draft RSS (policy T8) both emphasise the importance of sustainable tourism in rural areas, particularly in terms of accessibility to local services.

Core Policy 9 – Meeting Community Needs

We feel that reference to specific issues relating to health care, such as providing health care facilities in rural areas, should be included in Core Policy 9.

Core Policy 10 – Managing Risk

Policy R2 of current RSS and Policy ENV1 of draft RSS both emphasise the importance of flood management and using strategic flood risk assessments to guide the location of development in flood prone areas. It might be that there are some more detailed considerations that need to be reflected in Core Policy 10 before it is submitted.

The draft RSS (Policy ENV3) states the importance of maintaining high standards of water quality. It states that development plans will achieve and maintain a high standard of coastal water quality at Whitby, Scarborough, and Filey. The Assembly would wish to see this reflected in Core Policy 10.

Core Policy 11 – Developer Contributions

No comments to add.

I trust that these comments are helpful to you as you prepare the Core Strategy for submission to the Secretary of State. If you wish to discuss any of the points made here

please do not hesitate to get in touch. We look forward to continuing to work with you on your Core Strategy.

Regards

A handwritten signature in black ink, appearing to read 'Jenny Poxon', written in a cursive style.

Jenny Poxon
Head of Planning Delivery and Conformity