## John Mook

**Representor Number ID 853475** 

Matter 1, Issue 1.5. (HA 23)

## Matter 1 Issue 1.5.1

There are prohibitive costs that impact on the viability of the development HA23.

Reference is made to Viability Report [CD14] Site Name: Church Cliff Drive-Filey (HA23). The Cumulative model shows a result in Negative (Amber) for housing development. The viability is undermined further when the housing development area is reduced if buffer zones to the Country Park and Church Cliff Farm are taken into consideration. This would mean increased costs in moving the pressurized main drainage infrastructure to fit into the development plan. In addition costs would be added as a result of additional expenses of CIL, S278, S106, SuDS and a Storm Water Attenuation System. These points have been highlighted in the Proposed Plan responses by Mr Jason Tait, Planning Prospects, (ADDRESS REDACTED).<sup>2</sup>

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For the above reasons the proposed housing allocation site HA 23 should be dismissed.

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<sup>&</sup>lt;sup>1</sup> See NPPF 173-177 and PPG ID 12-018.

<sup>&</sup>lt;sup>2</sup> See Appendix.

## Appendix . From SBC Consultation Portal. Proposed Plan Responses

Scarborough Borough Council - Who Said What? HAZ3

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REPRESENTOR NUMBER

What are you looking for?

Output

Output

Output

Proposed Submission Local Plantic Soft by & Stone, Retirement Lifestyles Ltd. () (ID: 371848)

To which document does your comment(s) relate?

Housing SiteIf your representation refers to a Housing Site listed under Policy HC2 please select the site from the list. Site HA23: Land off Church Cliff Drive, Filey

Legal ComplianceDo you consider the Scarborough Borough Local Plan to be legally compliant?



Soundness Of PlanDo you consider that the Scarborough Borough Local Plan is sound?



Reason for being UnsoundIf you consider the plan to be unsound, is it because it is not: (If you are suggesting the Plan is sound please select NIA)

Justified

Scarborough Borough Local Plan

· Consistent with national policy

Unsound or Not Legally CompliantWhy specifically do you consider the Scarborough Borough Local Plan is not legally compliant or is unsound? (Or alternatively confirm your support)

\*Note this is an extract from a wider submission on Policy HC2, see attached.\*

Policy HC2 identifies 34 sites which the Council seeks to allocate for residential development, as also shown on the Policies Map. Through these 34 sites the Council identify an indicative total yield of 6,350 of which the Proposed Submission Local Plan relies on to deliver it's identified housing requirement of a minimum of 9,681 dwellings over the Plan period. The identified yield of these 34 sites is 6,350, but this is indicative meaning that it could be more but in reality it is more likely to be less. In this instance the suggested allocated sites would not contribute sufficient numbers of housing to meet the identified requirement (notwithstanding our concerns over the requirement not being sufficient itself – see separate representations with regard to draft Policy HC1).

This would result in a reliance on non-allocated 'windfall' sites to meet the Borough's need for hsouing. The Council acknowledge this in the Proposed Submission Local Plan, at paragraph 6.15. Where this is the case, and to avoid a reliance on potentially unsustainable windfall sites, we would suggest that the Council needs to allocate significantly more sites to meet its housing need. This is particularly pertinent where we believe the identified housing target is insufficient to begin with.

In addition to the above, there are a number of draft allocation sites that are unsustainable and/or would not yield the number of houses indicated by the Council. As such these sites should not be taken forward as draft Allocations as suggested in the Proposed Submission Local Plan. We object to these allocations principally on the following grounds:

HA23 - Land off Church Cliff Drive, Filey

Filey has had significant flooding and drainage issues in recent years. As stated above for HA22, the draft policy states that development should not prevent or stymie the flood alleviation measures proposed and will be required to perform to the same specification as the flood alleviation measures proposed by the Filey Flood Alleviation Scheme. This could impact on the viability of a scheme. The site is in close proximity to listed buildings at Church Cliff and Filey Country Park. Draft policy HC2 suggests a landscape buffer is provided between the development and Country Park which would reduce the amount of land available for development. Headscape Buffel To consequence and the country Park which would reduce the amount of land available for development.

Necessary Changes to make Local Plan legally compliant or soundWhat are the changes required to make the Scarborough Borough Local Plan legally compliant or sound? (If you support the Plan then please type N/A)

10/00 1