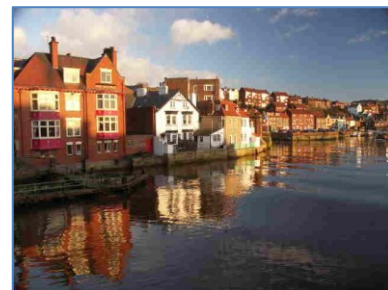




Representations
from
Whitby Area Development Trust
in response to
the proposed submission
SBC Local Plan 2011 - 2032

December 2015



Foreword

The proposed submission SBC Local Plan will shape the lives and livelihoods of local residents until 2032. It will determine what may be built, where, and for what purpose.

Yet the whole consultation and submission process is far from transparent. The final submission comprises the Plan and more than 40 supporting documents. Very few local residents have the time or inclination to read the many thousands of pages, full of acronyms and management-speak. This does not support effective local participation and democracy.

The charitable objects of the Whitby Area Development Trust are *“The promotion for the benefit of the public of urban or rural regeneration in areas of social and economic deprivation (and in particular in the Whitby district and surrounding area)”* including *“the protection or conservation of the environment.”*

We make no apology for the length of this document in response to the Plan documents. On-line forms are unduly restrictive. We have attempted to present a coherent picture of the shortcomings of the proposed Local Plan in respect of the Whitby area.

The submission process requires all objections to be raised at this stage: from fundamental principles to the details of particular site allocations. The report has therefore been structured in three sections. The first challenges the fundamental basis of the Plan. The second examines the sustainability of the key policies and site allocations within the proposed Plan. The third illustrates why a separate Sustainability Appraisal should have been undertaken, of the effect of the development proposed for Whitby on the setting and economy of the North York Moors National Park.

Recognising the need to plan positively, the report includes some suggestions of alternative policy frameworks for Whitby, which would better meet local housing needs and support sustainable development.



L.A. Overton
Chairman
Whitby Area Development Trust

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EXECUTIVE OVERVIEW

Section I: Fundamental Analysis

- The proposed Local Plan is based on the identification of the whole borough as a single Housing Market Area (HMA). Evidence is presented that the borough consists of two distinct Housing Market Areas that share the same boundaries as the two Travel-to-Work Areas (TTWAs). Together, they chance to coincide with the local authority boundary.
- The SBC-wide minimum housing requirement is derived from DCLG projections. The Objectively Assessed Need should be identified separately for each area, to take into account the historic trends and differences in the demographic profiles of the Scarborough and Whitby TTWAs.
- Using the relevant TTWA earnings figures and lower quartile house prices would result in a reduction of the assessed level of affordable housing need in the Plan for the Scarborough TTWA and an increase in assessed need for the Whitby TTWA.
- The total borough housing requirement was based on a high-growth economic scenario. The housing needed to attract additional workers was based on rates of economic activity; out-commuting; and unemployment, which were assumed to remain constant over the plan period. Those rates currently differ significantly between the Whitby and Scarborough TTWAs.
- The Whitby TTWA is characterised by high levels of self-employment; one-person businesses; working from or at home; and a few small employers. The existing enterprise profile is unlikely to generate significant job growth.
- Location-dependent new industries such as York Potash and Dalby Offshore are the only potential larger-scale new employers, given Whitby's remote setting. Their proposed developments may create 200-250 new jobs in the Whitby TTWA during the plan period - but are by no means certain to materialise. Further, many of those potential jobs could be filled by current residents, since 22% of the resident workforce commutes out of the area to work.
- The proposed Local Plan needs to demonstrate that there will be a suitable alignment between economic development, job and workforce growth and the housing allocations proposed for the Whitby and Scarborough TTWAs.
- The SBC position on holiday / second homes is inconsistent. It is not possible to determine housing need and allocations without an accurate understanding of the existing housing stock.
- **In the light of all the above factors, the proposed Local Plan is not sound.**

Section II: Sustainability

- Whitby is running out of space, given the constraints of coast, river and National Park boundary. Continued housing development on the proposed scale is not sustainable.
- There is no planned contingency allowance for resettlement of existing residents and businesses because of flooding or landslip, should relocation prove unavoidable.
- Building urban density housing along the National Park boundary affects the setting of the National Park and is contrary to both national and SBC planning policies.
- Green Space policies need stronger monitoring to ensure the effective protection and enhancement of existing open spaces. The proposed Local Plan requires a clear action plan to redress the deficit of green space in Whitby.
- **The proposed Local Plan is not sustainable.**
- There is clear justification for a rural-related rather than urban policy framework for the Whitby area:
 - ❖ Whitby is unique: it is the only urban settlement in Great Britain that is wholly enclosed (on land) by a National Park.
 - ❖ The population of the Whitby urban area is defined as 'rural-related' by Defra and ONS, as part of its identification as a 'hub town'.
 - ❖ There are only 90,600 people in England (0.2% of the population) living in a settlement of over 10,000 people set in a sparsely populated rural area¹. 13,200 of those live in the Whitby urban area.

Section III: Duty to Co-operate

- The tourism economies of Whitby and the National Park are heavily inter-dependent, as evidenced by several recent independent studies.
- A separate Sustainability Appraisal should have been made, of the effect on the setting and economy of the North York Moors National Park of the development proposed for Whitby town. The Sustainability Appraisal should have been undertaken in conjunction with, and ratified by, the North York Moors National Park Authority.
- **The Duty to Co-operate has not been met.**

1

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/479506/Statistical_Digest_of_Rural_England_2015_November_edition.pdf

PART I – FUNDAMENTAL ANALYSIS

1. One Housing Market Area or Two?

1.1 Issue:

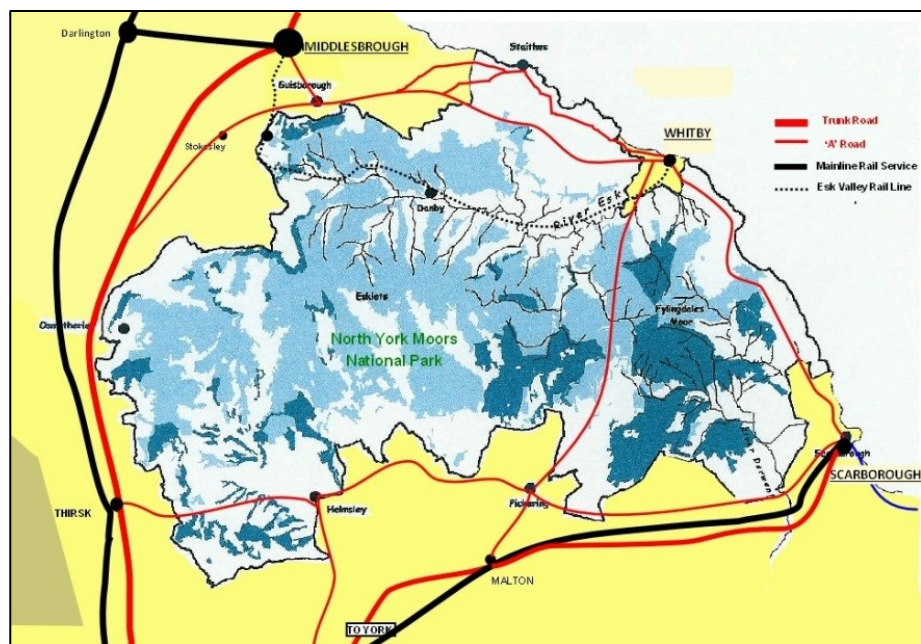
The proposed SBC Local Plan (LP 6.29) identifies the whole borough as a single Housing Market Area (HMA) on the grounds that “...66.9% of households move within Scarborough area and 84.6% of residents in employment work within the Borough....Of households planning to move, 78.2% intend on remaining in Scarborough Borough. This evidence confirms that Scarborough Local Plan area is an appropriate housing market area for the purposes of Local Plan policy making.”

1.2 Submission: The borough consists of two distinct Housing Market Areas that share the same boundaries as the two Travel-to-Work Areas (TTWAs). Together, they chance to coincide with the local authority boundary.

1.3 Supporting Evidence:

1.3(a) Physical Geography

The nearest towns to Whitby are Scarborough (30km), Guisborough (33km) and Malton (46km). Whitby is linked to each by single carriageway, upland and exposed



moorland roads, which are subject to closure during winter weather. Between towns, the roads cross the very sparsely-populated upland areas of the North York Moors National Park.

➤ The physical geography alone would suggest the existence of a distinct HMA.

1.3(b) Travel to Work Area (TTWA)

The SBC Strategic Housing Market Analysis (SHMA) and proposed Local Plan did not consider TTWAs when determining the relevant HMA for their housing needs assessments.

The current ONS criteria for defining a TTWA are *“that generally at least 75% of an area's resident workforce work in the area and at least 75% of the people who work in the area also live in the area. The area must also have a working population of at least 3,500. TTWA boundaries are non-overlapping, are contiguous and cover the whole of the UK.”*²

ONS Map and statistics:



TTWA Name	Number of residents in work	Workplace population ¹	Number of residents working in area	Supply-side self-containment (% employed residents who work locally)	Demand-side self-containment (% local jobs taken by local residents)	Number of economically active residents (aged 16+)
Whitby	11,738	10,279	8,683	74.0	84.5	12,479
Scarborough	36,922	36,557	31,493	85.3	86.2	40,158

¹ The workplace population of an area is an estimate of the number of people working in the area, both non-resident commuters into the area and residents (including home workers and resident workers with no fixed place of work)

Analysis of commuting data for the Whitby TTWA shows that 3.7% of the working population commutes out of the area to work in the small geographic areas containing Boulby Potash mine and RAF Fylingdales Early Warning Station. Both lie less than 1km over the TTWA boundary.

- **The Whitby TTWA is a strongly self-contained labour market: 84.5% of jobs are filled by local residents – and 77.7% of local residents work in the area, if Boulby and Fylingdales are included.**

² <http://www.ons.gov.uk/ons/guide-method/geography/beginner-s-guide/other/travel-to-work-areas/index.html>

1.3(c) Other Administrative Boundaries:

- The Whitby TTWA matches the boundaries of the former Whitby Rural and Urban District. It is now administered as the 'Northern Area' of Scarborough Borough Council, consisting of seven electoral wards.
- The TTWA matches the school catchment area: education from age 11 is provided at the two secondary schools in Whitby town.
- The Whitby and Scarborough TTWAs correlate with the local NHS structure. The CCG for Hambleton, Richmondshire and Whitby contracts its acute hospital services from the South Tees Hospitals NHS Trust. The CCG for Scarborough and Ryedale contracts its acute hospital services from the York Teaching Hospital NHS Foundation Trust.

1.3(d) Retail and Services Catchment area:

Whitby town offers the only supermarkets, banks, building societies, dentists, opticians, community hospital, and farmers' livestock mart within the TTWA. Defra and ONS define Whitby as a 'hub town'³: *"a town with a population of 10,000 -30,000 which has the potential to be the centre of business and service provision for its surrounding rural area."*

1.3(e) House prices and rates of change in house prices:⁴

Table 3.2 in the Scarborough SHMA shows 'House prices in Scarborough Borough by ward during 2014' – listed in alphabetical order. The same table, re-ordered by the Scarborough TTWA and Whitby TTWA would have highlighted the price differential:

³ <https://www.gov.uk/government/statistics/2011-rural-urban-classification-of-local-authority-and-other-higher-level-geographies-for-statistical-purposes>

⁴ House Price Statistics for Small Areas, 1995 to 2014 <http://www.ons.gov.uk/ons/publications/re-reference-tables.html?edition=tcn%3A77-406271#tab-all-tables>

		Price Paid 2014		
SBC Ward		Lower Q	Median	Upper Q
WHITBY TTWA	Danby	170,000	190,000	275,000
	Esk Valley	168,000	250,000	339,000
	Fylingdales	220,000	250,000	316,000
	Mayfield	155,000	173,250	210,000
	Mulgrave	147,000	185,000	250,000
	Streonshalh	120,000	140,000	165,000
	West Cliff	110,000	151,500	200,000
SCARBOROUGH TTWA	Castle	67,750	93,500	135,250
	Cayton	117,000	140,000	172,000
	Central	93,000	107,000	120,000
	Derwent Valley	145,000	175,000	270,000
	Eastfield	90,000	105,000	120,000
	Falsgrave Park	95,000	113,250	135,000
	Filey	111,000	133,500	164,000
	Hertford	123,000	149,950	168,000
	Lindhead	148,000	180,000	230,000
	Newby	139,950	155,000	177,000
	North Bay	82,000	115,000	150,000
	Northstead	120,000	132,500	175,000
	Ramshill	70,000	87,500	152,500
	Scalby, Hackness and			
	Staintondale	182,500	233,000	278,000
	Seamer	134,500	156,000	182,000
	Stepney	95,000	124,950	176,000
	Weaponness	85,000	110,000	156,000
	Woodlands	84,500	119,995	153,500
ALL SBC:		110,000	142,500	185,000

Source: Land Registry Price Paid Data: 1 Jan 2014 to 31 Dec 2014

(Median prices shown in red are those wards where the median price is higher than the median figure for the borough-wide HMA)

1.3(f) The SHMA table above shows a median house price of £142,500 in 2014 for the single, borough-wide HMA. Separating out the data shows that the median house price in the Whitby TTWA was £183,500 compared to £132,500 in the Scarborough TTWA⁵:

House sales	Median Price Paid					
	2009	2010	2011	2012	2013	2014
SBC	141,500	148,000	147,000	143,000	144,000	147,000
Whitby TTWA	171,500	187,000	185,000	172,000	184,000	183,500
Scarborough TTWA	130,000	131,000	130,500	130,500	130,000	132,500
Source: ONS House Price Statistics for Small Areas, 1995 to 2014						

1.3(g) The margin between Whitby and Scarborough house prices is long-standing and is evident across all types of housing. The mix of housing differs between the TTWAs. **Using borough-wide statistics masks significant differences in the housing market:**

Median Sale Price by House Type 2005 - 2009- 2014					
SBC					
Year	Detached	Semi-detached	Terraced	Flats & Maisonettes	All dwelling types
2014	223,000	151,000	130,000	97,000	147,000
2009	212,500	141,000	127,000	113,500	141,500
2005	221,000	147,500	121,500	108,000	139,500
Increase 2005-2014	0.9%	2.4%	7.0%	-10.2%	5.4%
Proportion of Sales	20.8%	30.2%	28.2%	20.8%	100.0%
Whitby TTWA					
Year	Detached	Semi-detached	Terraced	Flats & Maisonettes	All dwelling types
2014	264,500	176,000	160,500	109,500	183,500
2009	261,000	163,500	154,000	116,500	171,500
2005	250,500	167,500	152,500	136,500	171,500
Increase 2005-2014	5.6%	5.1%	5.2%	-19.8%	7.0%
Proportion of Sales	26.3%	26.8%	30.6%	16.4%	100.0%
Scarborough TTWA					
Year	Detached	Semi-detached	Terraced	Flats & Maisonettes	All dwelling types
2014	203,000	142,000	116,000	93,500	132,500
2009	183,000	134,500	113,000	112,500	130,000
2005	206,000	141,000	110,500	100,000	128,500
Increase 2005-2014	-1.5%	0.7%	5.0%	-6.5%	3.1%
Proportion of Sales	18.8%	31.5%	27.3%	22.4%	100.0%
Source: ONS House Price Statistics for Small Areas, 1995 to 2014					

⁵ The ONS median varies slightly from the Land Registry median given in the SHMA (£147,000 v £142,500). This may reflect timing differences in the data sets, but is irrelevant to the point at issue: the Whitby median is in the £180,000s whereas the SBC-wide median is in the £140,000s.

1.3(h) The rate of change of house prices also differs by TTWA. As shown above, median house prices rose by 7% in Whitby over the past decade, compared to 3% in Scarborough, so widening the house price differential.

1.3(i) Household Migration and Search Patterns

The SBC SHMA states that 66.9% of households move within the borough. It is not possible to identify moves within TTWAs within a local authority area from the census data currently available to the public. However, such analysis could have been produced from the data collected for the SBC Household Survey, which was undertaken to inform the SBC SHMA.

1.4 Sub-area or distinct local HMA?

The proposed Local Plan identifies Whitby as a sub-area of the borough-wide HMA. Under the settlement hierarchy, Whitby is allocated 11% of the SBC housing target. Whitby is by far the largest sub-area but, more importantly, it is the most distant from all other parts of the borough. The blanket 11% allocation could result in increased levels of commuting through the National Park, if there is a mismatch in the location, types or levels of housing development – or of job creation.

1.5 Summary

- **Selection of the relevant HMA is a matter of judgement. It should be decided and justified after examination of the alternatives⁶, using a relevant and up-to-date evidence base.**
- **The alternative of identifying a local housing target for a distinct and separate Whitby HMA should have been evaluated.**
- **The administrative convenience of basing the SBC Local Plan on a single HMA needs more justification than is given in the Local Plan submission.**

⁶ The SBC SHMA did allude to the 'gold standard' Whitby/Malton Strategic Housing Market Area identified in the NHPAU studies. Census analysis shows that in/out commuting between the Malton and Whitby TTWAs is minimal. More Whitby residents work on off-shore installations than in the Malton TTWA, excluding RAF Fylingdales. The NHPAU analysis may have identified adjacent areas with common market conditions rather than a house search area shared by the residents of Whitby and Malton. A common factor is the limited housing supply in the North York Moors National Park.

2. The Objective Assessment of Housing Needs

2.1 Using borough-wide statistics obscures the many differences in the demographic profiles of the two TTWAs. Key statistics that are relevant to the establishment of the Objective Assessment of Housing Needs (OAN) are:-

2.1(a) Population and Household Growth

		Census Population			DCLG Projected Population		Census Households			H'hold Size	DCLG Projected Households		H'hold Size
		2001	2011		2032		2001	2011		2011	2032		2032
SBC		106,243	108,793	2.4%	110,900	2.1%	46,724	49,435	5.8%	2.15	53,068	7.3%	2.09
Whitby TTWA		25,988	25,094	-3.4%	25,573	1.9%	11,098	11,328	2.1%	2.17	?	?	?
Scarborough TTWA		80,255	83,699	4.3%	85,430	2.5%	35,626	38,107	7.0%	2.15	?	?	?

The SBC OAN identified a minimum housing requirement of 3,668 additional dwellings over the plan period, derived from DCLG projections of population and household growth. Census data shows that the population of the Whitby TTWA fell between 2001 and 2011, which translated into lower growth in the number of households. Growth in the Scarborough TTWA was stronger on both counts, over the decade.

The DCLG projected population 2032 by TTWA, shown above, varies from the SBC-wide estimate because of differences in the age profiles of the two TTWAs

2.1(b) Age Structure

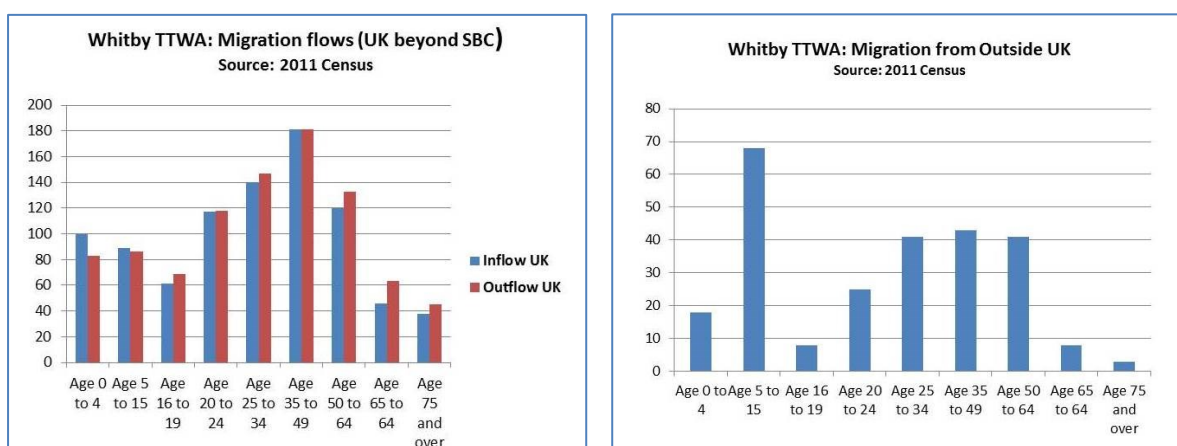
Local Plan 2.5: “Parts of the Borough are popular retirement areas and 31% of the population is aged 60 years plus compared to 28% in North Yorkshire and 23% in England and Wales as a whole. Conversely only 11% of the population is aged between 20 and 29 years, compared to 14% in England and Wales. This raises concerns about the outward migration of young people from the Borough and what can be done to retain and attract young people to the area. Furthermore it is necessary to consider how best to meet specialist needs in terms of social and health care, as well as housing which is capable of being adapted to suit changing life circumstances.”

Age Structure by Travel to Work Area												
(2011 Census)	Population	Age 0-19		Age 20-29		Age 30 to 44		Age 45 to 59		Age 60 and over		
SBC	108,793	22,646	20.8%	11,635	10.7%	17,291	15.9%	23,181	21.3%	34,040	31.3%	
Whitby TTWA	25,094	4,822	19.2%	2,275	9.1%	3,697	14.7%	5,939	23.7%	8,361	33.3%	
Scarborough TTWA	83,699	17,824	21.3%	9,360	11.2%	13,594	16.2%	17,242	20.6%	25,679	30.7%	

The age structure of the Whitby TTWA is more heavily skewed to the older age groups, increasing the need for suitable types of housing for older residents, together with housing to retain young workers in the area.

2.1(c) Migration to the Area from outside the Borough

Though providing only a snapshot of one year's migration, Census data does not support the widely-held view that retirees to the coast swell the numbers of older residents, beyond normal demographic change. More people aged 50 and over moved out of the area than moved into Whitby during 2011. There was a small net inward migration thanks to migrants from outside the UK – with a noticeable proportion of school-age young people.



2.2 Summary

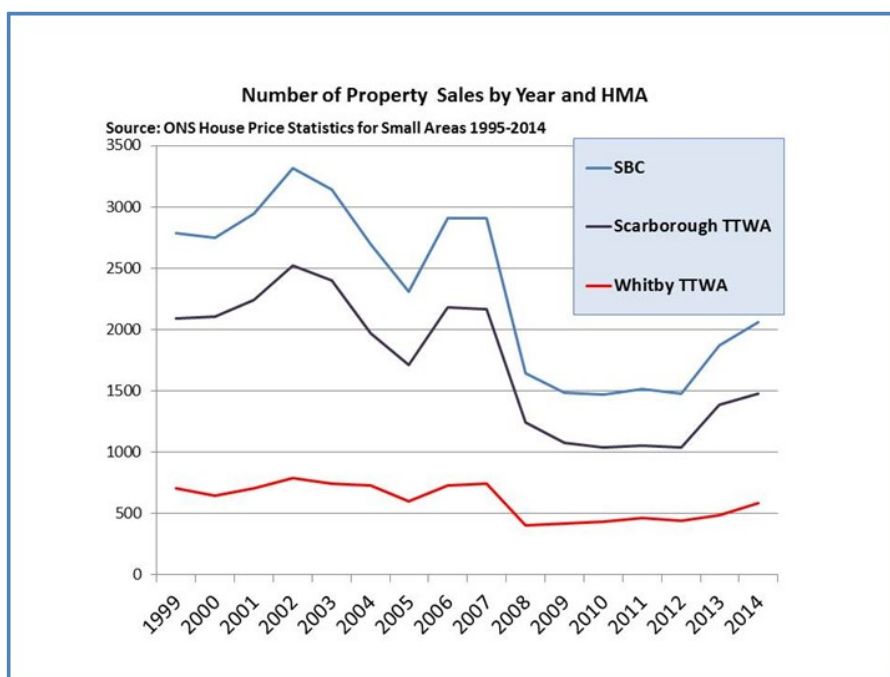
- The minimum housing requirement derived from DCLG projections should be calculated separately for each area, to take account of historic trends and differences in the demographic profiles of the Scarborough and Whitby TTWAs.

3. MARKET TRENDS

3.1 SBC background paper: 'Delivering a Local Plan Housing Target'

(5.3) *"In terms of price/transaction indicators, a key message from Table 5.1 is that the market prices have been broadly consistent over the period 2010-2014, although the number of transactions has generally been increasing over time. The number of property sales has increased from 1,471 in 2010 to 1,893 in 2014. Over the period 2010 to 2014, lower quartile prices have ranged between £105,000 and £110,000 and median prices have ranged between £140,000 and £145,000. Relative affordability has ranged between 6.1x and 6.4x earnings."*

3.2 The level of transactions in the Whitby TTWA housing market was far less affected by the economic downturn:



3.3 There is typically a 30-40% difference in median house prices between the TTWAs. This will translate into marked differences between lower quartile house prices – and therefore into marked differences in relative affordability:

House sales		Median Price Paid					
		2009	2010	2011	2012	2013	2014
SBC		141,500	148,000	147,000	143,000	144,000	147,000
Whitby TTWA		171,500	187,000	185,000	172,000	184,000	183,500
Scarborough TTWA		130,000	131,000	130,500	130,500	130,000	132,500
Source: ONS House Price Statistics for Small Areas, 1995 to 2014							

- 3.4** Further confirmation that Whitby and Scarborough lie in two different HMAs is shown by comparing price levels over the past 10 years, to avoid the distortions in the housing market caused by the economic recession after the 2008 financial crash.

Over the past decade, median prices in the Whitby housing market rose by 7%, compared to 3.1% in Scarborough:

Median Sale Price by House Type 2005 - 2009- 2014						
SBC		<u>SBC</u>				
Year	Detached	Semi-detached	Terraced	Flats & Maisonettes	All dwelling types	
2014	223,000	151,000	130,000	97,000	147,000	
2009	212,500	141,000	127,000	113,500	141,500	
2005	221,000	147,500	121,500	108,000	139,500	
Increase 2005-2014	0.9%	2.4%	7.0%	-10.2%	5.4%	
Proportion of Sales	20.8%	30.2%	28.2%	20.8%	100.0%	
Whitby TTWA		<u>Whitby TTWA</u>				
Year	Detached	Semi-detached	Terraced	Flats & Maisonettes	All dwelling types	
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2009	261,000	163,500	154,000	116,500	171,500	
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Increase 2005-2014	5.6%	5.1%	5.2%	-19.8%	7.0%	
Proportion of Sales	26.3%	26.8%	30.6%	16.4%	100.0%	
Scarborough TTWA		<u>Scarborough TTWA</u>				
Year	Detached	Semi-detached	Terraced	Flats & Maisonettes	All dwelling types	
2014	203,000	142,000	116,000	93,500	132,500	
2009	183,000	134,500	113,000	112,500	130,000	
2005	206,000	141,000	110,500	100,000	128,500	
Increase 2005-2014	-1.5%	0.7%	5.0%	-6.5%	3.1%	
Proportion of Sales	18.8%	31.5%	27.3%	22.4%	100.0%	
Source: ONS House Price Statistics for Small Areas, 1995 to 2014						

3.5 Income and Earnings

Local Plan 2.13: *“In terms of incomes and earnings, a significant proportion of the resident population fall within low income brackets; 66.8% of the local population earn less than £23,400 per year. The median weekly income for people working in the Borough is below the regional and national averages, with a weekly gross income of*

£459 for the workforce population. As a comparison the average weekly wage for the region is £479 and nationally £520.”

Annual Survey of Hours and Earnings					
Gross Weekly pay (£): Full-time employees				Equivalent Annual Salary	
Tax Year: 2013-2014				2013-2014	
Workplace	Lower Q	Median		Lower Q	Median
Whitby TTWA	275	382		£14,300	£19,864
Scarborough TTWA	334	491		£17,368	£25,532
SBC	314	446		£16,328	£23,192
Yorks & Humber	349	479		£18,148	£24,908
UK	370	518		£19,240	£26,936
Source: ASHE Revised Estimates for 2014 published 18 Nov 2015					

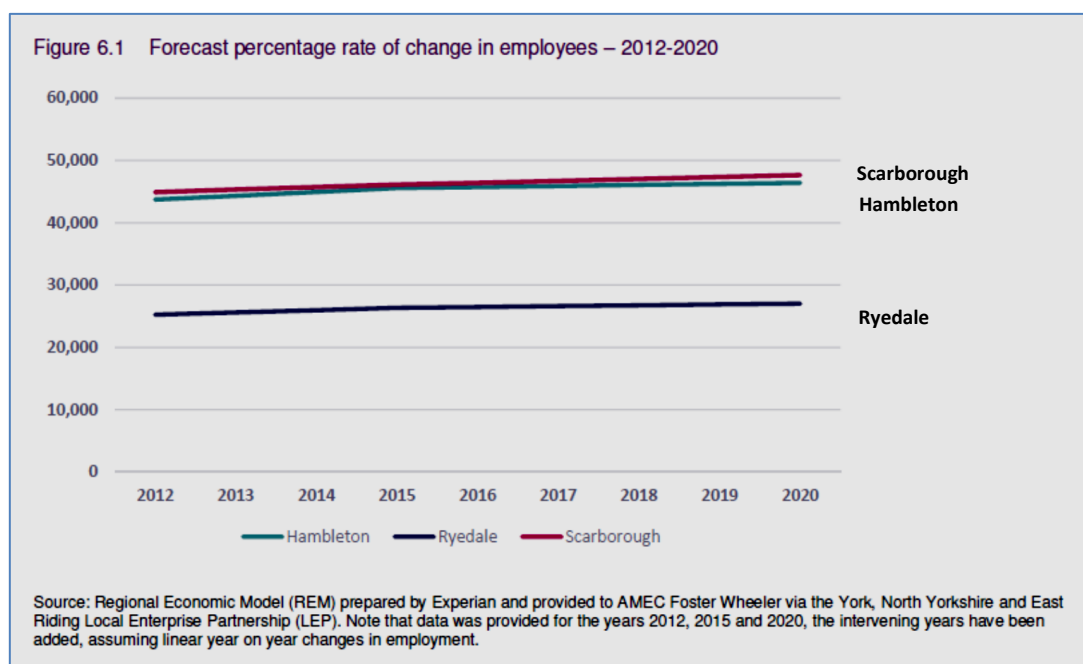
Wages in the Whitby TTWA are considerably lower than in the Scarborough TTWA, though house prices are much higher - with significant implications for the calculation of affordable housing needs.

3.6 Summary

- Relevant evidence supports the submission that Whitby and Scarborough form separate Housing Market Areas.
- Using the relevant TTWA earnings figures and lower quartile house prices would result in a reduction of the assessed level of affordable housing need in the Plan for the Scarborough TTWA and an increase in assessed need for the Whitby TTWA.
- The proposed SBC Local Plan is not sound.

4. Economic Development Scenarios

- 4.1** The proposed Local Plan is based on a 'high growth' economic scenario for the borough, which is estimated to create 5,000 new jobs. Allowing for workers in existing jobs reaching retirement, results in an estimated shortfall of 6,000 people of working age. The proposed Local Plan concludes that 5,983 additional dwellings would be required over the plan period, to attract new workers to move into the borough.
- 4.2** This high growth scenario does not tally with the employment forecasts produced for the York, North Yorkshire and East Riding Local Enterprise Partnership⁷ which predict employment growth in Scarborough of less than 4% between 2012 and 2020:



4.3 Assumptions made in the proposed Local Plan

In order to estimate the housing need arising from employment growth and economic projections, a series of assumptions were adopted over the Plan period⁸, including:

- A constant rate of economic activity of 62.8% amongst 16-74 year olds;
- Commuting patterns to remain constant with a net out-commute of 5.07% of residents in employment;
- Unemployment rates falling to 5%

⁷ Reproduced from the Report on the Economy of the North York Moors National Park, prepared for the Park Authority in relation to the York Potash Planning Application by Amec Foster Wheeler Environment & Infrastructure UK Limited. May 2015.

⁸ SBC: Delivering a Local Plan Housing Target (4.48)

4.3(a) 2011 Census data shows the Whitby TTWA had an economic activity rate of 67% amongst 16-74 year olds and a net out-commute rate of 8.3% (or 10.3% if residents working on offshore installations or abroad were to be included). The ONS figures in the table below show that 6% of economically active residents were not in work, compared to 8% in the Scarborough TTWA:

TTWA Name	Number of residents in work	Workplace population ¹	Number of residents working in area	Supply-side self-containment (% employed residents who work locally)	Demand-side self-containment (% local jobs taken by local residents)	Number of economically active residents (aged 16+)
Whitby	11,738	10,279	8,683	74.0	84.5	12,479
Scarborough	36,922	36,557	31,493	85.3	86.2	40,158

¹ The workplace population of an area is an estimate of the number of people working in the area, both non-resident commuters into the area and residents (including home workers and resident workers with no fixed place of work)

4.3(b) The most recent data⁹ (though sample-based and using an estimate of the working population aged 16-64) confirms marked differences between the two labour markets:

		April 2014 to March 2015						July 2013 to June 2014	
	Population	Labour supply						Jobseeker's Allowance ⁴	
		Employment ²		Unemployment ³		Economic inactivity ²			
	16-64 (000s)	Total 16+ (000s)	16-64 Rate (%)	Total 16+ (000s)	16-64 Rate ⁴ (%)	Total 16-64 (000s)	16-64 Rate (%)	Level	Proportion ⁵ (%)
WHITBY TTWA	16	7	69.3	#	#	2	21.7	289	1.8
SCARBOROUGH TTWA	52	37	66.2	3	7.3	15	28.3	1,691	3.3
YORKSHIRE AND THE HUMBER	3,395	2,436	70.2	212	8.0	792	23.5	120,166	3.5
ENGLAND	34,351	25,605	72.3	1,777	6.5	7,686	22.5	904,434	2.6

Sample size too small to provide estimates.

4.3(c) Out-commuting

The Whitby TTWA has a shortage of suitable employment. It has an economically active population of 12,479, but a workplace requirement of only 10,279. Some 2,600 residents (22% of residents in employment) commute out of the area despite the distance to other towns, uncertain journey times over exposed moorland roads, and poor public transport. A further 250 residents (equivalent to 2% of the workforce) work on offshore installations or abroad.

⁹ ONS: LI03 Local labour market indicators by travel-to-work area

4.4 In-commuting

Despite the low wages on offer, some 1600 workers commute into the Whitby TTWA area. 75% are in-commuters from the Scarborough and Middlesbrough/Stockton TTWAs where house prices are more affordable – particularly in Redcar & Cleveland. Small area analysis and local information suggests that some of these in-commuters are young workers who were formerly resident in Whitby. They ‘get on the housing ladder’ by purchasing property in the Redcar and Cleveland area and commute back to work in Whitby. The A174 road from Saltburn to Whitby follows the narrow coastal plateau and is the only access road to Whitby that does not cross high moorland. Thanks to its proximity to the sea, it is the access route least prone to disruption from bad weather in winter. As the least scenic route, it is also the least prone to visitor traffic congestion during better weather.

- If SBC wishes to “*retain and attract young people to the area*” (LP2.5) this emigré group would offer a clear target market for affordable purchase schemes.
- A reduction of commuting through the North York Moors National Park is a desirable outcome in its own right. Attracting back those young workers with existing family connections would also help to address sustainable community issues such as social care for the elderly and child care for working parents.

4.5 Residents in Employment

Of the working age (16 - 74) residents in employment¹⁰:

- 74% work within the Whitby TTWA
- 3.7% work on the TTWA boundary: at Boulby or Fylingdales
- 15.6% work in the adjoining TTWAs of Scarborough (7.9%), Malton (1.3%) or Middlesbrough/Stockton (6.4%)
- 6.4% work further afield, particularly York, Leeds, Hambleton and the NE

4.6 Key features of the Labour Market

- 26% of the residents working in the TTWA work at or from home
- a further 8% work from anywhere
- and 22% of all working age residents are self-employed

4.7 Current Business and Employment Profile

Census data shows few of the residents working within the Whitby TTWA are in technical, scientific or managerial posts. The business count reveals few enterprises with such requirements:

¹⁰ 2011 Census

UK Business Counts: Enterprises by Number of Employees							
Employees	SBC		Whitby TTWA		Scarborough TTWA		
0 to 4	2,895	70.6%	1,200	74.5%	1,695	68.1%	
5 to 9	685	16.7%	245	15.2%	440	17.7%	
10 to 19	320	7.8%	105	6.5%	215	8.6%	
20 to 49	165	4.0%	55	3.4%	110	4.4%	
50 to 99	20	0.5%	5	0.3%	15	0.6%	
100 to 249	15	0.4%	0	0.0%	15	0.6%	
Enterprises	4,100	100.0%	1,610	100.0%	2,490	100.0%	

There are no large employers in the Whitby TTWA. Only 5 businesses employ more than 50 people and none employ 100 or more. 90% of all businesses employ fewer than 10 people.

- 4.8** Census figures show that 22% of the economically active residents of the Whitby TTWA are self-employed¹¹. But 73% of those self-employed do not employ anyone else – suggesting that a high proportion of the 1200 businesses shown above as employing 0-4 people, actually have no employees at all.
- 4.9** The very high proportion of residents who work at or mainly from home (19% of the TTWA residents in work) may be a reflection of travel difficulties and / or of changing work patterns thanks to the internet. Local knowledge suggests a growing proportion of residents combine self-employment with part-time employed work or project work / consultancy assignments.
- **Significant job growth is extremely unlikely from the existing businesses in the Whitby TTWA**

4.10 Future New Employers?

Local Plan 7.7 *“Econometric modelling has shown that economic growth over the plan period will be primarily driven by the service sectors, including the “Accommodation, Food Services & Recreation”, “Professional & Other Private Services” and “Public Services” sectors. The “Wholesale & Retail” and “Construction” sectors are also anticipated to grow, albeit to a lesser extent. Growth within these established sectors will be reinforced by the emergence of new economic sectors, most notably through the recently approved Potash Mine, which is to be constructed 5km south of Whitby. The Potash Mine has the potential to contribute significantly to the job market and the local economy.”*

The proposed Local Plan also cites the potential for job creation offered by the use of Whitby harbour by Dalby Offshore to service the major wind farms to be installed in the North Sea.

¹¹ 2011 Census.

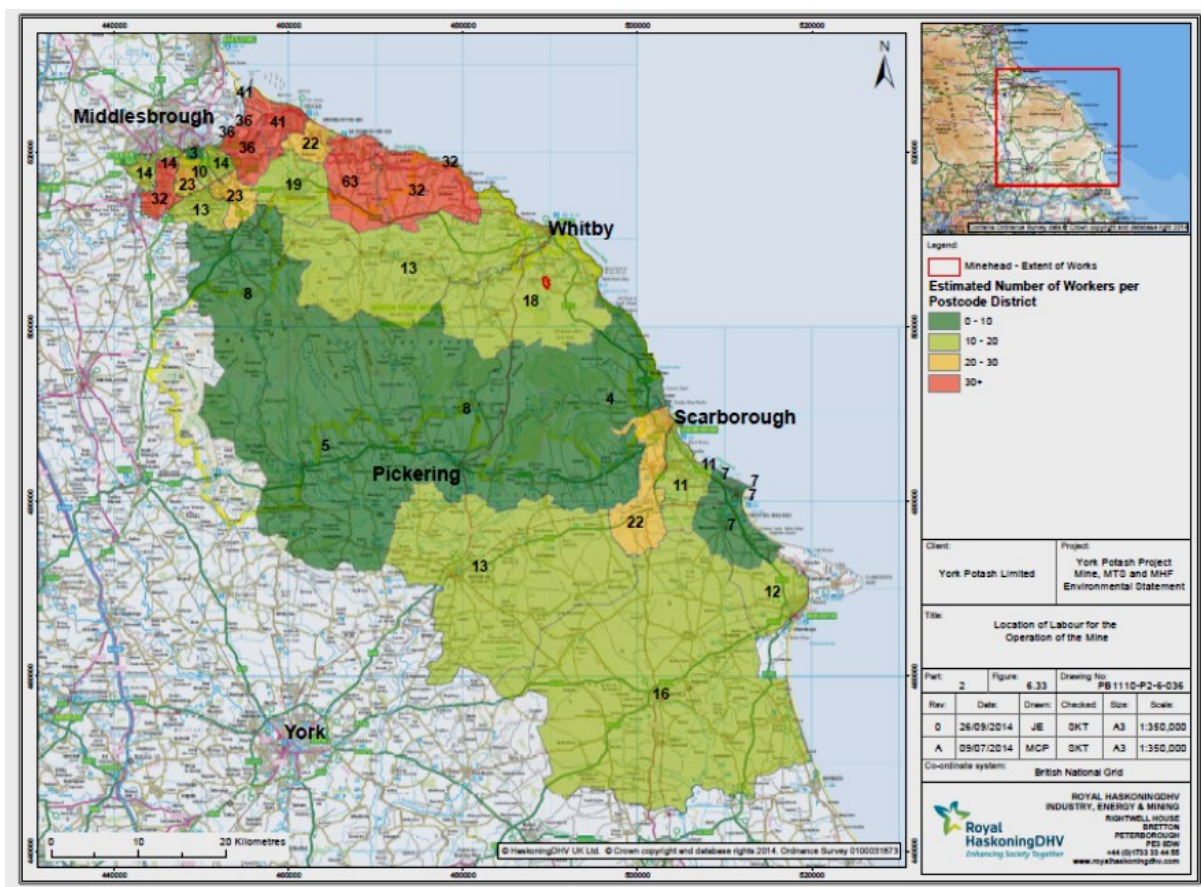
Many Whitby residents are rather more sceptical about future job prospects than SBC's Economic Development department. The development of a new potash mine has been mooted every 20-30 years since the 1930s, but only Boulby mine came into production.

The development of North Sea wind farms (Dogger Bank in particular) appears to have stalled since the Government announced changes to the renewables subsidy.

4.10(a) York Potash estimate that their proposed mine to the south of Whitby would employ some 650-700 people - once the mine reaches full production in 2024, assuming:-

- the company can raise development finance of £1.7 billion
- construction starts on schedule in 2016 and
- construction work including a deep mine and a 35 km underground tunnel, from Whitby to Teesside, is completed on schedule in 2021.

Once those conditions are satisfied, planning documents submitted by York Potash (see below) estimate that when in full production, some 31 employees would be drawn from the YO21/22 postcode areas – essentially the Whitby TTWA.



The proposed Local Plan identifies that the York Potash development could bring 500 jobs to the borough, including indirect and supply-chain jobs, (LP 2.16).

Local Plan (7.10) *“The majority of this demand (for employment land) has been allocated to the Scarborough Urban Area as the main focus for growth within the Local Plan in line with the settlement hierarchy.”*

- Some 200 residents of the TTWA are currently employed at Boulby Potash mine, which has recently announced a restructuring involving reducing the workforce by one third.
- The 31 jobs potentially on offer at the new mine in 2024 may well be filled by existing TTWA residents with experience of the local potash industry.

4.10(b) Dalby Offshore estimate that they could create up to 200 jobs in Whitby, though no details or timescale have been made public. They hope to start construction of new premises, on the harbour-side during 2016. Final planning permission was granted in 2015 for the massive Dogger Bank windfarms, but construction has yet to start.

There are currently over 200 residents of the Whitby TTWA working on offshore installations who would appear to have the requisite skills and experience for North Sea working. That said, most of the potential jobs appear to be shore-based office work that could readily be filled from the existing workforce of the TTWA.

- The potential jobs created by the Dalby Offshore development are likely to be filled by existing TTWA residents.

4.11 The proposed Local Plan indirectly suggests that new workers need to be attracted to the Borough because of low skill levels in the existing labour force:

Local Plan 7.16 *“Twenty six percent of the Borough's residents have no qualification. This makes it difficult for residents to compete for low/medium skills jobs, highlighting the overall gap between the skill needs of the area and the existing skills pool available.”*

Over 25% of residents in the Whitby TTWA have Level 4 qualifications (degree or equiv.)¹² Together with the 22% out-commute rate, this suggests that the existing skills pool may be adequate to meet most of the technical, scientific and managerial requirements of new employers.

¹² 2011 Census

4.12 Summary

- Under the 'high growth' economic scenario for the borough, the proposed Local Plan includes additional housing to attract 6,000 new workers.
- Forecasts of additional housing need were based on assumptions about rates of economic activity; out-commuting; and unemployment, which were to remain constant over the plan period. Those rates currently differ significantly between the Whitby and Scarborough TTWAs.
- The Whitby TTWA is characterised by high levels of self-employment; one-person businesses; working from or at home; and a few small employers. The existing enterprise profile is unlikely to generate significant job growth.
- Location-dependent new industries such as York Potash and Dalby Offshore are the only potential larger-scale new employers, given Whitby's remote setting.
- The York Potash and Dalby Offshore proposals may create 200-250 new jobs in the Whitby TTWA during the plan period - but are by no means certain to materialise.
- Many of the potential jobs could be filled by current residents.
- Further analysis is required to justify the need for additional housing in the Whitby TTWA to attract incoming workers – including a review of the existing housing stock.
- The proposed Local Plan needs to demonstrate that there will be a suitable alignment between economic development, job and workforce growth and the housing allocations proposed for the Whitby and Scarborough TTWAs.

5. Existing Housing Stock

5.1 How Many Second or Holiday Homes?

In its response to an earlier draft of the SBC Local Plan, Whitby Area Development Trust submitted evidence on the high proportion of second / holiday homes in the Whitby area and the effect this was having on the availability of affordable housing for local residents¹³.

This latest Plan maintains the previous SBC position that second / holiday homes only represent 7.3% of the borough housing stock and no action is required:

Local Plan 2.6 “..... There are over 4000 properties classed as second homes (some used for holiday lets) which equates to 7.3% of the dwelling stock.”

5.2 Proportion of Holiday Homes?

Re-ordering the Council tax data shown in Table 4.1 of the SBC SHMA again highlights housing market differences requiring further investigation. The SBC data shows a 15.6% vacancy rate in the Whitby TTWA, compared to 8.1% in the Scarborough TTWA:

¹³ Available at <http://www.coliseumcentre.org/downloads/>

SBC Council Tax data from Table 4.1 of SHMA Oct 2015					2011 Census data: Vacant / Second / Holiday homes				
2011 ward	Total Dwellings	Total House holds	Total Vacant (empty furnished and unfurnished including second / holiday homes)	% Vacant	2011 ward	All categories: Dwelling type	House hold spaces with at least one usual resident	House hold spaces with no usual resident	% Household spaces with no usual resident
Mulgrave	2,102	1,617	485	23.1%	Mulgrave	2,175	1,560	615	28.3%
Whitby West Cliff	2,732	2,169	563	20.6%	Whitby West Cliff	2,766	2,003	798	28.9%
Fylingdales	1,157	948	209	18.1%	Fylingdales	1,259	911	348	27.6%
Streonshalh	2,506	2,064	442	17.6%	Streonshalh	2,603	2,034	569	21.9%
Esk Valley	2,227	1,966	261	11.7%	Esk Valley	2,282	1,923	359	15.7%
Danby	944	861	83	8.8%	Danby	952	837	115	12.1%
Mayfield	2,184	2,069	115	5.3%	Mayfield	2,203	2,060	143	6.5%
Whitby TTWA	13,852	11,694	2,158	15.6%	Whitby TTWA	14,240	11,328	2,947	20.7%
Filey	4,081	3,325	756	18.5%	Filey	3,929	3,197	734	18.7%
Weaponness	2,157	1,814	343	15.9%	Weaponness	2,177	1,800	392	18.0%
Ramshill	2,997	2,565	432	14.4%	Ramshill	2,879	2,413	544	18.9%
Hertford	2,626	2,270	356	13.6%	Hertford	2,536	2,237	299	11.8%
Castle	3,134	2,711	423	13.5%	Castle	3,142	2,553	616	19.6%
North Bay	2,700	2,391	309	11.4%	North Bay	2,650	2,218	476	18.0%
Central	2,190	2,076	114	5.2%	Central	2,244	2,089	157	7.0%
Cayton	2,125	2,025	102	4.8%	Cayton	2,037	1,944	93	4.6%
Lindhead	1,033	984	49	4.7%	Lindhead	1,096	1,018	78	7.1%
Scalby, Hackness &	1,896	1,811	85	4.5%	Scalby, Hackness &	1,969	1,798	174	8.8%
Derwent Valley	2,069	1,985	84	4.1%	Derwent Valley	2,091	1,968	123	5.9%
Stepney	2,278	2,188	90	4.0%	Stepney	2,123	2,060	132	6.2%
Northstead	1,880	1,806	74	3.9%	Northstead	1,848	1,766	82	4.4%
Falsgrave Park	2,312	2,237	75	3.2%	Falsgrave Park	2,252	2,131	123	5.5%
Seamer	2,069	2,015	54	2.6%	Seamer	2,031	1,962	69	3.4%
Newby	2,876	2,811	65	2.3%	Newby	2,811	2,712	99	3.5%
Woodlands	2,048	2,005	43	2.1%	Woodlands	2,025	1,947	78	3.9%
Eastfield	2,559	2,519	40	1.6%	Eastfield	2,363	2,294	69	2.9%
Scarboro' TTWA	43,030	39,538	3,494	8.1%	Scarborough TTWA	42,203	38,107	4,338	10.3%

The table on the right shows the 2011 Census data for the same wards.

- The proposed Local Plan continues to rely on SBC Council tax data for its inventory of vacant / second / holiday homes, despite a 33% difference in the figures for the Whitby TTWA - and a 25% difference in the Scarborough TTWA.

5.3 Growth in Holiday Homes?

SBC background paper: 'Delivering a Local Plan Housing Target'

"...The recent trend in second home ownership has been fairly static and there are no indicators that this situation will change over the Plan period."

- Household spaces with 'no usual resident' in the Whitby TTWA rose from 1813 to 2947 between the 2001 Census and the 2011 Census – an increase of 82%.
- The DCLG English Housing Survey showed a 20% increase in second homes between 2009-10 and 2013-14.

5.4 Conflicting Market Signals

There is a difference of over 800 holiday / second / vacant properties in the TTWA between Council Tax data and Census data. Vacant dwellings on that scale would normally indicate a massive over-supply, leading to plummeting house prices and a vast improvement in housing affordability. Yet, as shown earlier, house prices are higher and the rate of growth in house prices has been stronger in the Whitby TTWA.

5.5 Proposed Housing Allocation

The proposed Local Plan allocates 1065 new dwellings to Whitby over the plan period (11% of the total of 9681 for SBC). Since 2011, some 250 have been delivered or are currently under construction in Whitby. Sites have already been committed for a further 365 dwellings.

5.6 Summary

The SBC position on holiday / second homes is inconsistent:

Either: there is a far higher proportion of holiday / second homes in Whitby than SBC records indicate. In which case, the proposed Local Plan needs to take account of that fact.

Or: there are 800 vacant dwellings in the Whitby TTWA, over and above the SBC figures for second homes and long-term vacancies. In which case there is no requirement for any more housing in Whitby over the plan period.

- **It is not possible to determine housing need and allocations without an accurate understanding of the existing housing stock.**
- **The proposed Local Plan is not sound.**

PART II - SUSTAINABILITY

The proposed Local Plan recognises that the current economy of Whitby is heavily dependent on tourism. That high dependency will continue throughout the Plan period, whether or not new economic sectors such as potash or wind farms begin to emerge. Some site allocations should be made conditional on the actual emergence of these new sectors, as was the case in earlier drafts of the Plan.

To ensure that the tourism economy is sustainable over the long-term, the need for development must be balanced against the need to protect the natural and physical environment. Whitby's attraction to visitors depends on its setting, townscape and history. The natural and built environment is a major part of the visitor offer. There are limits to development – not least those imposed by the sea, river, and National Park boundary.

Submission:

- a) The SBC proposed Local Plan should include a Sustainability Appraisal of the policies and proposed site allocations, specifically as they relate to the Whitby area, and
- b) That Sustainability Appraisal should be undertaken in conjunction with, and be ratified by, the North York Moors National Park Authority.

Reasons:

- a) Sustainable development within the Whitby urban area is a key concern, given Whitby's unique location as the only urban settlement in the UK that is wholly enclosed (on land) by a National Park.
- b) The proposed Local Plan contains policies in respect of landscape setting, but not in respect of commuter traffic through the National Park, or with respect to the tourism economy of the National Park
- c) The strength of the tourism industry in Whitby is very important to the overall health of the tourism economy across the National Park.
- d) Part, at least, of the external demand for housing in Whitby results from the limited housing supply in the National Park.

6. Sustainable Development

6.1 The Limited Land Supply

Local Plan 2.33 “The ability to identify land for development is limited by topography, the coast and the national designation of the North York Moors National Park.”

SBC has planning responsibility for the urban area of the Whitby TTWA and the villages of Sleights and Sandsend. Often referred to as the Whitby enclave, it has a total area of around 1000 ha, with the built area covering less than 750 ha, including the river and harbour. It is the only part of the 47,000 ha of the SBC Northern Area that lies outside the North York Moors National Park.

The development area of the town (marked in red) is extremely densely-built. Green space per head of population is a fraction of that in Scarborough or Filey. Potential development sites within the former development boundary are scarce and usually brownfield sites of limited size.



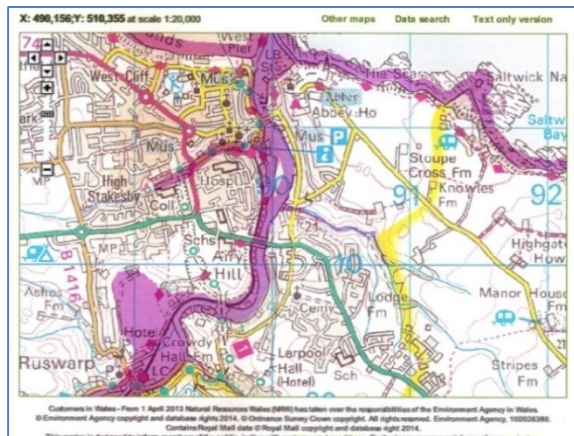
6.2 Landscape Constraints

- The Heritage Coast designation precludes development along the cliff tops to the East and West of the town. There is also a statutory requirement to protect the iconic setting of Whitby Abbey on the headland above the town.
- The sweeping vistas along the Esk Valley are key attractions of the North York Moors National Park. The steep sides of the valley drain to the River Esk. It is the only salmon river in Yorkshire and an important wild-life corridor.
- Any development to the south-west of the current built-up area of the town would detract from the setting of the National Park. The Park & Ride site lies on the coastal plateau, just before the land begins to slope down to the river. Though it lies within the National Park, that was considered less intrusive than siting it further south, outside the National Park boundary but highly visible from the Esk Valley.
- Most recent development has taken place to the east of the town, where it is less easily visible across a wide area of the National Park. However, expansion of the Whitby Business Park could only be achieved by a further breach of the National Park boundary – following several years of an SBC / NYMNPA joint working party.

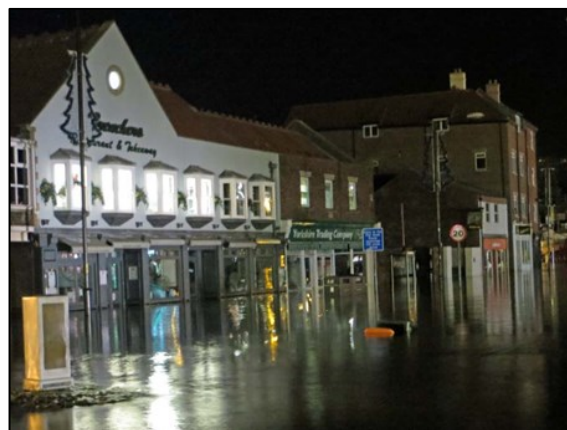
6.3 Flood risk

6.31 Whitby is regularly subject to flooding from both the sea and the River Esk. Flooding frequency is forecast to increase because of rising sea levels and more extreme rainfall on the upland areas draining into the River Esk.

6.32 The Environment Agency map shows the current flood warning areas. The extent of the land affected may be expected to increase in future. The large purple-shaded area at the bottom left of the map is the Ruswarp flood plain of the River Esk.



6.33 The town centre and over 200 homes around the harbour were flooded in 2013. A further consequence of increased rainfall is land slippage - as has taken place over the last few years on the cliffs to either side of the harbour, affecting Aelfleda Terrace, Henrietta Street and Cliff Street.



6.34 As a short river, draining extensive areas of high moorland, the River Esk has a long history of devastating flash floods during hot summer months. Research by the Met. Office and Newcastle University finds that the frequency of such flash floods is likely to increase by a factor of five.¹⁴

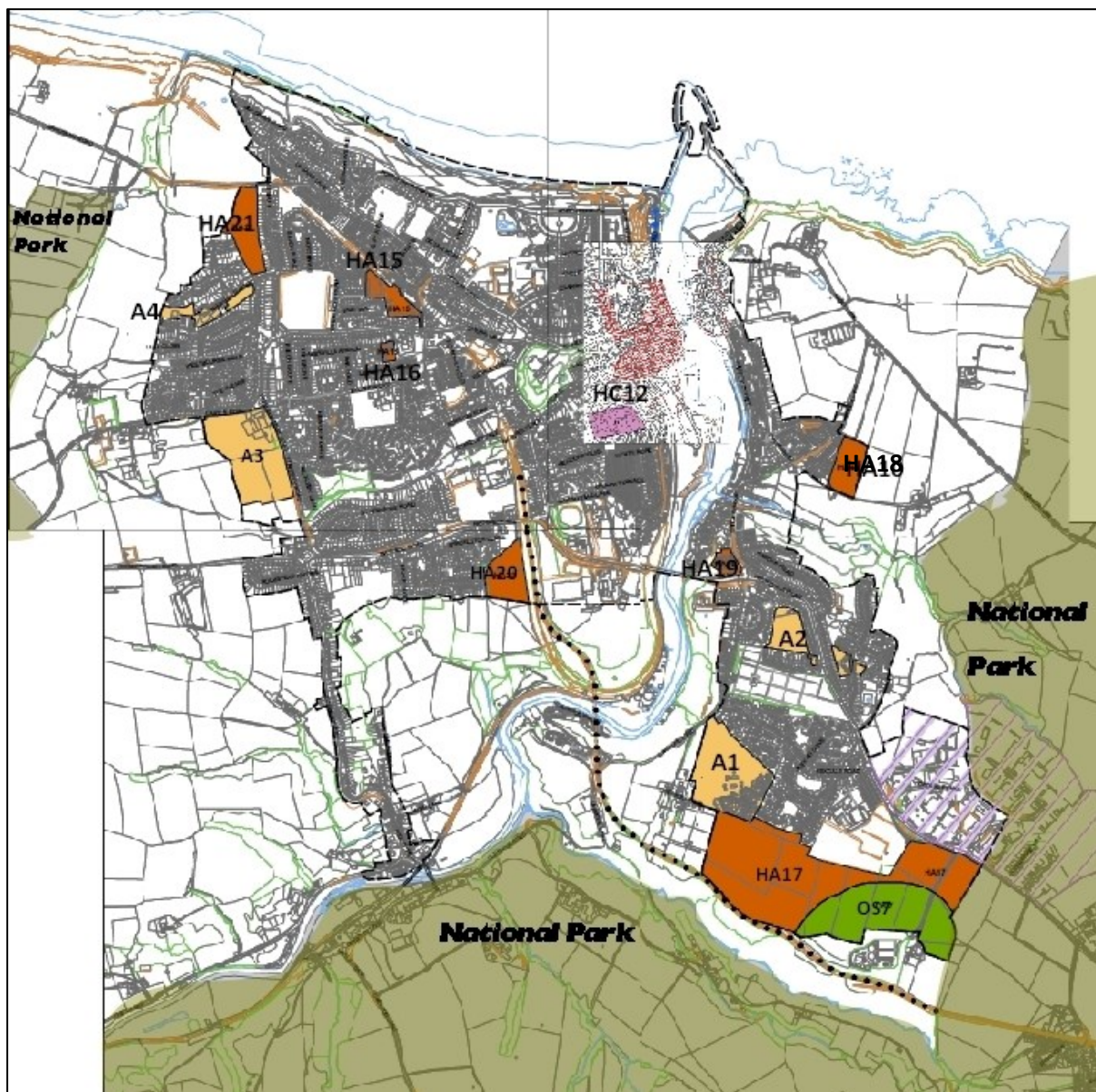
6.35 The National Planning Policy Framework (NPPF)¹⁵ requires that: *“where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to facilitate the relocation of development, including housing, to more sustainable locations.*

➤ **Sufficient development land within the development boundary should be identified in the Local Plan 2011-2032 to be held in reserve, to rehome local residents and businesses should managed retreat become inevitable from some existing built areas.**

¹⁴ <http://www.bbc.co.uk/news/science-environment-27624478>

¹⁵ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

7. Housing Site Allocations in the Proposed Local Plan



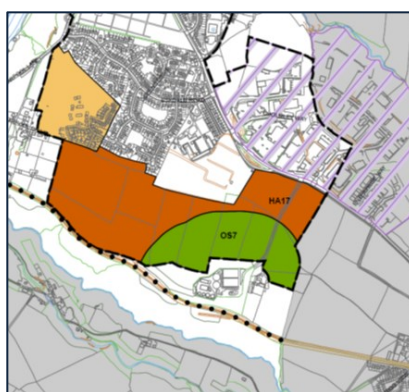
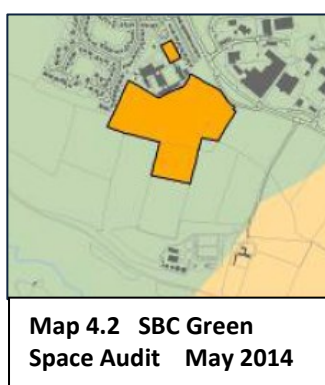
Composite map of proposed and allocated development sites

- 7.1 Sites A1, A2, A3 and A4 are allocated sites with an indicative yield of some 500 units. Sites A1 and A3 were green field sites outside the development limits of the previous Plan; A2 was a playing field and amenity green space; A4 was amenity green space.
- 7.3 The proposed sites HA17 (320 units), HA18 (40 units) and HA21 (60 units) are all green field sites lying outside the previous development boundary. Taken together with sites HA15 (80), HA16 (10), HA19 (20) and HA20 (50 units) gives a further 580 units over the Plan period. However, site HA19 cannot be redeveloped until the estimated 50-60 extra care properties have been delivered on the hospital site under policy HC12. Allowing for windfalls (approx. 35 since 2011) gives a grand total of some 1200 dwellings over the Plan period.

7.4 Summary

- Whitby is running out of space. Continued housing development on the proposed scale is not sustainable.
- There is no contingency allowance to rehome local residents and businesses should managed retreat become inevitable from some existing built areas.
- Building urban density housing along the National Park boundary affects the setting of the National Park and is contrary to both national and SBC planning policies.

Example: The inclusion of Site HA17 in the proposed Local Plan demonstrates many of the issues that would be brought into focus by a Sustainability Appraisal for the Whitby area.



Protection and Provision of Green Space?

The Green Space Audit included the football field of Eskdale secondary school (the rectangular area extending towards the south, on the left-hand map above). The proposed housing site HA17, on the right-hand map, incorporates the football field.

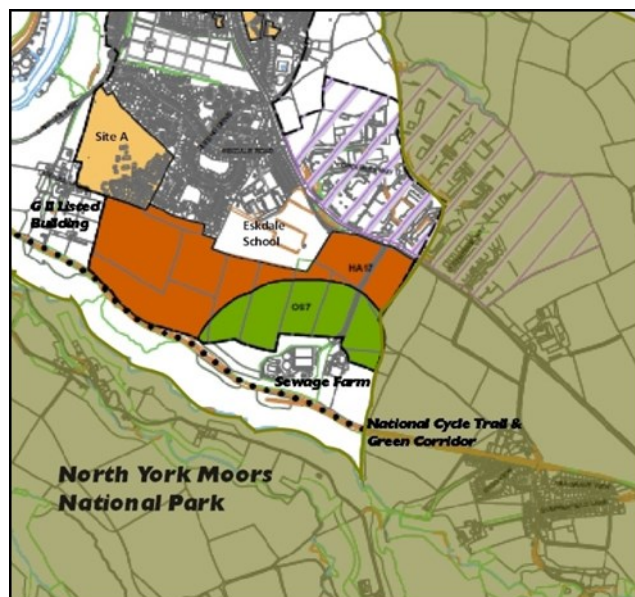
SBC Playing Pitch Strategy Oct 2013: *“There is a small amount of overuse (+1 match equivalent session) on the junior 11-a-side pitches at Eskdale School. This is due to the many sources of demand placed on the pitches; they are used by the school and by Fishburn Park FC for competitive junior matches and for training purposes.”*

The green shaded land, allocated as OS7 under Policy HC 16, is described as a new Neighbourhood Park – but is in fact the coyly-named ‘odour exclusion zone’ around the sewage treatment plant to the south, at Broomfield Farm.

Not all of this new Neighbourhood Park may actually be green:

SBC Proposed Local Plan Nov 2015: *“Land allocated for open space through allocation OS7 could also be used for other forms of essential/supporting infrastructure, including the construction of connecting roads, to enable the development to come forward. Should the development require the existing football pitch to the south of Eskdale School to be relocated, the expectation will be that the pitch should be relocated in close proximity to the existing site. The utilisation of the buffer zone for these complementary uses may allow a higher density on the residential allocation.”*

Site HA17 abuts the National Park boundary to the East and a Grade II Listed building to the West. To the South, it abuts a National Cycle Trail and designated wild life corridor. It lies on a South facing hillside, within metres of the National Park boundary which follows the stream at the bottom of the slope.



Draft SBC Local Plan of May 2014:

“It is likely that a substantial 'residential exclusion zone' will be required encircling the existing sewage treatment plant. Whilst this restricts the developable area it is expected that the buffer zone would be suitable for Public Open Space, recreational opportunities and playing pitches. Investigation into the development of the school playing fields and adjacent football pitch as part of a 'land swap' is encouraged to free up further land for residential development;

- Is there really no better alternative than a ‘Neighbourhood Park’ crossed by access roads – where residents and schoolchildren can enjoy not-so-fresh air and exercise?

b) Protection of the Setting of the National Park?

Local Plan 8.61 *“In addition to landscapes within the Local Plan area, high importance will be given to protecting the landscape setting and scenic beauty of the North York*

Moors National Park, by ensuring inappropriate development that would result in a significant adverse impact on these features does not take place within the Local Plan area. Any proposals that may impact upon the National Park should be considered in accordance with Paragraph 115 of the NPPF.”

Planning permission was granted on Site A1 following the expiry of the last Local Plan in 2011, even though it lay outside the previous development limits. Having breached the skyline, the housing development on Site A1 is now visible across a wide area of the National Park and from the approach roads to the Town.



- **Site HA17 would mark a very significant visual intrusion of urban development into the rural area around Whitby.**
- **It abuts the National Park boundary, so affects the setting of the National Park.**
- **Development would impact on views from the National Park towards the Abbey Headland and Heritage Coast.**

8. Green Space Provision

- 8.1 **Local Plan 2.8** “There is a wide range of accessible open spaces and sports facilities that provide local communities with the opportunity to participate in recreational and amenity activities that help to promote physical health and well-being. Each of the three main towns has a comprehensive network of open spaces, many of which are important not only for their recreational value but also **for their value as tourist attractions...** “

Local Plan 2.9 “Local evidence suggests that there are no significant identifiable deficiencies in the current provision of open spaces and sports facilities.....

The SBC Green Space Audit 2014 did identify some deficiencies in the provision of parks and other natural green spaces in Whitby town. The total Green Space per 1000 population was found to be 8.77 ha in Scarborough, 10.12 ha in Filey and 5.63 ha in Whitby.

➤ **The Green Space figure for Whitby is now 4.64 ha per 1000 population.**

- 8.2 The low level of green space within Whitby has fallen further since the Green Space Audit took place, because of completed or allocated development:

Green Space Provision - Whitby Town (Area in Hectares)				
	SBC Green Space Audit 2014	Actual Nov-15	Local Urban Standard	Actual v Std (ha)
Natural Parks and Green Space	21.0	21.0	26.4	-5.5
Natural and Semi-Natural Green Space				
Country Parks				
Urban Parks	7.0	7.0	13.2	-6.2
Squares and Gardens				
Town Parks				
Other Green Space	16.2	12.4	7.3	5.2
Amenity Green Space				
Green Corridor				
Outdoor Sports Facilities¹	22.5	20.9	22.5	-1.6
Education and Professional				
Other				
Total	66.7	61.3	69.4	-8.1
Note 1: Audit figure adjusted. Secondary school sports facilities of 17.7 ha. serve the 25,000 population of the TTWA. Green Audit showed 30.9 not 22.5.				

(Note: The Green Space Audit figure given for Outdoor Sports Facilities has been adjusted to reflect the fact that the secondary schools serve the population of the whole TTWA.)

- 8.3 Amenity green space has suffered the greatest erosion, presumably because it shows a ‘surplus’ against the Local Urban Standard. Yet these small neighbourhood patches are the most viewed and most convenient for the high proportion of more elderly residents in the town or for small children to be able to play close to home.

8.4 SBC Green Space Audit. May 2014

7.15 “There are 3 Natural Parks and Green Spaces within Whitby covering approximately 21 hectares. This equates to 1.59 hectares of provision per 1,000 population (population of 13,213), which falls below the level of provision required by the local standard for the urban areas (2 hectares per 1,000 population). As such, there is shown to be a quantitative deficiency of 5.46 hectares within the town. However, this deficiency is considered to be offset by the town’s proximity to the North York Moors National Park, which offers extensive opportunities to access natural greenspace provision.”

- One third of households in Whitby town have no private transport¹⁶.
- The National Park is not ‘free to roam’; to have a picnic; or kick a ball about.
- The National Park is not a larger version of the Country Parks provided for the residents of Scarborough and Filey.

8.5 SBC Green Space SPD Nov 2014 re Natural and semi-natural green space

Vision: A well-managed, accessible semi-natural / native environment designated to protect and enhance wildlife / biodiversity. Includes water areas, appropriately sited information boards, bins, picnic areas and parking facilities. The area should be free of litter, fly tipping and dog fouling.”

Fine vision – but the reality is rather different:



¹⁶ 2011 Census

- 8.6 The West Cliff escarpment accounts for more than half of the 'Natural and Semi-natural Green Space' in Whitby – and for 18.5% of the total Green Space in the town. It was rated as 2 (Good) when assessed for quality in the Green Space Audit, against a 5-point scale from 'Excellent' to 'Poor'.
- 8.7 The difficulties of maintaining such an exposed site, on an unstable cliff face, are fully accepted. But, since it is only accessible to the fit, agile and hardy, it should not be part of the Green Space provision to be measured against the Local Urban Standard.
- **Without this site, Green Space in Whitby would be 3.79 ha per 1000 residents, compared to the 5.23 ha required to meet the Local Urban Standard.**
 - **Green Space policies need stronger monitoring to ensure the effective protection and enhancement of existing open spaces.**
 - **The proposed Local Plan requires a clear action plan to redress the deficit of green space in Whitby.**

9. The Effect of the Tourism Economy on Employment and Housing

- 9.1 In the latest of a series of studies on the economy of seaside towns¹⁷ Beatty, Fothergill and Gore found that where seaside tourism accounts for 10 per cent or more of all jobs the dependence of the local economy on tourism is quite high, and where the proportion reaches or exceeds 20 per cent the dependence is very high indeed. The share of total employment directly supported by seaside tourism, during 2010/12, was 29% in Whitby in comparison with 19% in Bridlington and 13% in Scarborough.
- 9.2 Their conclusions derive from comparisons of the levels of employment by sector of 'tourism' towns against matched towns with no tourism element. Analysis of employment by sector for the Whitby urban area (Whitby enclave) shows 'higher than expected' employment in several categories. Tourism activity usually influences the 'Accommodation and food services' sector [Whitby Enclave 16% : SBC 12%] and 'Wholesale and Retail' [Enclave 16% : SBC 16%]. But 'Construction' is noticeably higher in Whitby [Enclave 10.2%: SBC 8.1%]. These workers are not employed on major building sites, since Barratt Housing, York Potash, etc. use construction contractors who bring their own workforce.
- 9.3 Few towns the size of Whitby could maintain 10% of their workforce in building trades, together with five plumbers' / builders' merchants. These workers are busy renovating and maintaining holiday accommodation to meet the high standards expected by visitors. From the cottage cleaning services and four laundries to the two-man business washing out wheelie bins, a high proportion of the workforce is engaged in servicing the many self-catering holiday cottages and apartments.

In addition to their heavy internet presence, four of the holiday cottage agencies find it worthwhile to occupy retail premises in the town centre – to catch the eye of day visitors, who may be persuaded to return for a longer stay.



9.4 *"An increase in short-breaks alongside the traditional one or two week holidays has seen an increasing demand for self-catering accommodation. On the whole, seaside resorts have not developed the range of quality self-catering properties typically seen in rural areas and in cities."* (Visit England Strategic Action Plan 2010-2020)

➤ **Whitby has developed the type of holiday offering suggested by Visit England.**

¹⁷ Seaside Towns in the Age of Austerity. Beatty, Fothergill and Gore. CRESR. Sheffield Hallam University. July 2014 at <http://www.shu.ac.uk/research/cresr/sites/shu.ac.uk/files/seaside-towns-age-austerity.pdf> (Research undertaken with the support of DCLG)

- 9.5 But the development of the holiday cottage industry has had a very strong influence on the local housing market, which caters to external rather than local demand.



Former Language School



Former Car Showroom



Former Hotel

- 9.6 There are very few development opportunities close to the town centre - which would be the preferred site for housing suitable for more elderly residents. The vast majority of units in the brownfield developments above were purchased as second / holiday homes.

Former office premises in the town centre are now being converted to holiday homes.



- 9.7 The proposed Local Plan (7.15) refers to “... a legacy of outdated and under-used buildings within the harbours of Scarborough and Whitby.”

Any redundant buildings around Whitby harbour are very swiftly converted to holiday accommodation:



Former Sewage Pumping Station

Now:
“The ideal honeymoon hide-away”



Former Harbour Office

**Now: a 3-bedroom holiday flat
owned by SBC – complete with 2
reserved parking spaces on the
harbour-side**

10. Discussion of Alternative Policy Frameworks

- 10.1 Census figures show a net increase of 941 household spaces in the Whitby enclave between 2001 and 2011. But only 151 of those had full-time residents by 2011. 790 (84%) were holiday / second / empty homes with no full-time resident.
- 10.2 Holiday homes are bought and sold on the open market like any other. If open market housing is not being bought by full-time residents, then the assumption must be that it is the wrong type of housing – or that the housing is unaffordable to most local residents. There are currently 2,500 people from the Whitby area on the RSL waiting list, so affordability is the most likely issue.
- 10.3 The introduction of a 40% affordable housing requirement has delivered some affordable housing. But nowhere near enough to meet the need identified in the SBC SHMA which, as has been shown, is likely to have been a severe under-estimate.
- 10.4 The largest contribution to affordable housing has been made by the low-cost sale of public land to a Registered Social Landlord (RSL), albeit at the expense of green space.
- 10.5 Land constraints make it unsustainable to continue to deliver three open market houses for every two affordable homes – assuming 40% is actually achieved.
- 10.6 The usual policy response to the loss of housing stock to holiday / second homes would be a compensatory uplift in the total housing allocation. Historic evidence suggests it would not achieve the desired outcome. Increasing the level of market housing delivery would be even less sustainable, given the land constraints of the coast and the National Park boundary.
- 10.7 One alternative would be a policy requiring the sale of any publicly-owned land to RSLs etc. Sites HA15, HA16, HA19 and HA21 are owned by SBC and/or North Yorkshire County Council. HA15, HA16, HA19 are close to the town centre, so most suitable for housing to meet the needs of more elderly residents.
- 10.8 SBC is a signatory to the North Yorkshire Sub-Regional Housing and Homelessness Strategy (Approved October 2012) which states:¹⁸
- *We believe that the release of public land could provide a key tool for increasing our affordable housing provision.*
 - *We will target other owners of public land including the County Council, MoD and PCTs, increasing efforts to pursue innovative means of maximising the use of all public land to meet local housing needs.*

¹⁸ <http://www.northyorkshirestrategichousingpartnership.co.uk/images/documents/nyshpStrategyOctober2012web.pdf>

- *We need to continue to use the additional funding obtained through the reduction of Council Tax Discounts on second homes to invest in projects to address local housing need.*

10.9 Another option would be to adopt more rural-related policies. The Development Limits approved in the previous Plan could remain. A rural exception policy would then apply to any site outside the development limits, to ensure the maximum possible level of affordable housing delivery – together with more stringent design criteria and lower density, as befitting housing close to the National Park boundary.

➤ **There is clear justification for such a policy framework:**

- **Whitby is unique: it is the only urban settlement in Great Britain that is wholly enclosed (on land) by a National Park.**
- **The population of the Whitby urban area is now defined as ‘rural-related’ by Defra and ONS, as part of its identification as a ‘hub town’. Accordingly, Scarborough Borough Council is now a succinctly-named “*Urban LA with significant rural (Population 26% to 49% rural including hub towns)*”**
- **There are only 90,600 people in England who live in an urban settlement set in a sparsely populated rural area¹⁹ (0.2% of the population).
13,200 of those live in the Whitby urban area**

¹⁹

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/479506/Statistical_Digest_of_Rural_England_2015_November_edition.pdf

SECTION III: DUTY TO CO-OPERATE

11. The Duty to Co-operate

- 11.1 The proposed Local Plan states that SBC has consulted the North York Moors National Park Authority with respect to any housing requirement within the Plan to meet National Park housing need. The Area Action Plan for the Whitby Business Park was produced jointly by the two authorities, since the Business Park expansion breached the National Park boundary. Further consultation took place with North Yorkshire County Council over the siting of the Whitby Park & Ride site, which also breached the National Park boundary.
- 11.2 However, no joint working appears to have taken place with the North York Moors National Park Authority in relation to the overall effect of the Local Plan on the tourism economy of the Whitby urban area – which is very closely linked to the tourism economy of the National Park as a whole.
- 11.3 Assessing the economic effect of tourism is notoriously difficult. Fortunately, the scale of the recent York Potash Planning application to the North York Moors National Park Authority (NYMNPA) resulted in several studies. The economy of the North York Moors has been subjected to perhaps the closest scrutiny ever undertaken on a National Park.
- 11.4 The various studies, all prepared by leading firms of consultants, were evaluated for the National Park Authority by Amec Foster Wheeler²⁰ who concluded:

“The tourism sector is of key importance to the economy of the National Park and of Whitby. The STEAM report for 2013 for the National Park and for Whitby showed that day visitors contributed £177 m to the National Park and its ‘influence area’, and of this amount £104 m went to Whitby, which is part of this influence area. The tourism related businesses provide the majority of employment for both areas, and for Whitby the tourism sector also contains the greatest number of businesses. The strength of the tourism industry in Whitby is seen as being very important to the overall health of the tourism economy across the National Park.

The economy of the National Park is considered to be relatively healthy, notwithstanding some weak points, and is predicted to have reasonable growth prospects into the future. Whitby’s tourism industry has been seen to maintain its performance, if not possibly have grown slightly over recent years, and is relatively well positioned to continue to grow into the future.”

²⁰ Tourism Commentary on the York Potash Planning Application. Prepared for North York Moors National Park Authority by Amec Foster Wheeler Environment & Infrastructure UK Limited. May 2015

11.5 The annual STEAM surveys are commissioned by the North York Moors National Park Authority²¹. Statistics for Whitby had always been included within the ‘influence area’ of the National Park, but had never before been identified separately. They reveal a startlingly high level of inter-dependence between the visitor economy of the Whitby urban area (referred to as the Whitby enclave) and the National Park.

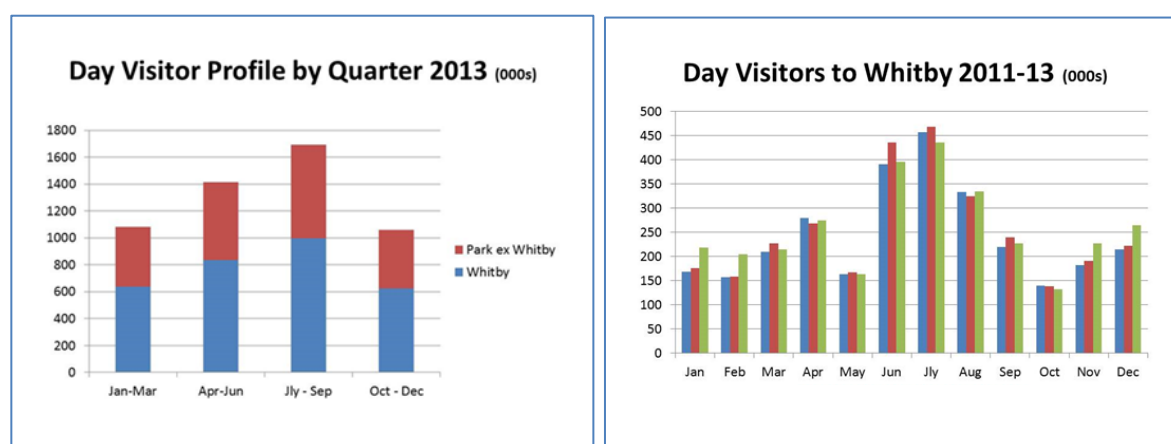
11.6 The STEAM²² reports show that Whitby receives some 3M day visits per year – 59% of the total day visits to the National Park:

DAY VISITORS IN 2013	Nat Park + Influence Area incl. Whitby	Whitby enclave only
Visitor days	5.25 M	3.09 M
Revenue	£177.45 M	£104.42 M
Direct Employment (FTE)	1819	1070

11.7 Tourism grew more strongly in Whitby than in the National Park as a whole, between 2011 and 2013

INCREASE IN DAY VISITORS BETWEEN 2011 AND 2013	Nat Park + Influence Area incl. Whitby		Whitby Enclave only	
Inc. in Visitor Days	151,000	3 %	174,000	6%
Inc. in Revenue (£ historic)	£16.89 M	11%	£12.63 M	14%
Inc. in Direct Employment (FTE)	135	8%	107	11%

11.8 Whitby receives a higher proportion of the day visits made to the National Park during the winter – and 40% of day visits to Whitby take place between October and March.



²¹ STEAM – Scarborough Tourism Economic Assessment Model. (Global Tourism Solutions UK Ltd)

²² The SBC Local Plan uses tourism statistics derived from the ‘top- down’ Cambridge econometric model. The STEAM (Scarborough Tourism Economic Assessment Model) uses a ‘bottom-up’ approach, which is generally viewed as more reliable for small areas. Most National Parks cross several LA boundaries so use STEAM figures.

11.9 In recognition of the growth in demand, the Department for Transport has made the provision of an all-year Sunday service through the National Park, from Middlesbrough to Whitby, a mandatory requirement of the new rail franchise starting in April 2016.

- **The tourism economies of Whitby and the National Park are inter-dependent.**
- **A separate Sustainability Appraisal should have been carried out, of the effect of the development proposed for Whitby on the setting and economy of the North York Moors National Park.**
- **The Sustainability Appraisal should have been undertaken in conjunction with, and ratified by, the North York Moors National Park Authority.**

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