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**Sent:** 18 Dec 2020 18:00:46 +0000  
**To:** Planning Services  
**Cc:** Marcus Whitmore  
**Subject:** 20/0267/FL

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20/02167/FL Demolition of existing building and erection of building to provide commercial floor space (Class E) at ground floor level and accommodation for NIJS key workers and students at the upper levels. 50-59 Newborough. Scarborough

## **OBJECTION**

I hereby include the following grounds for my objection to the above planning application.  
Please note that I have thoroughly read the revised design and access resubmission statement today 18/12/20.

Heritage  
Parking and active transport  
Noise and disturbance  
Retail unit excess  
Educational changes  
Lack of Market square

### 1) Heritage

Whilst there are no heritage assets on this site there are many in the immediate vicinity. The site is surrounded on 3 sides by a conservation area. In the Heritage Statement submitted with the planning application it was stated that 'The setting of the conservation area is a consideration under the National Planning Policy Framework 2019 (NPPF)'

It also states that ..... "the existing building is of no architectural or historical interest, and presents an anomaly in the town centre, for example it does not respect the predominant rhythm or vertical emphasis of the buildings within narrow plots that defines the adjacent conservation area. As such it detracts from the appearance of the town centre and from the setting of the conservation area".

The current building is indeed an eyesore, but the proposed building is no more favourable. It does not enhance the surroundings.

I have looked at the proposed build and it does not respect the "predominant rhythm or vertical emphasis of the buildings within narrow plots". Whilst the design has windows stacked, and walls recessed / built out to mimic buildings in the locality, it is as convincing as the current TKMaxx, Brunswick Centre and Matalan buildings are in their pretence at being a cluster of individual dwellings. Any and all new builds that have attempted to recreate the uniqueness of the existing high street of Scarborough have failed to do so.

To quote the NPPF paragraph 192, 'the desirability of a new development making a positive contribution to local character and distinctiveness' is not something that this build will achieve. It will not add a positive contribution to the local character and distinctness of the Old Town and Castle Ward. In fact, I feel it would cause substantive harm to the character of the area, and this could not be weighed against the public benefits to the area, as they are not expansive enough to warrant giving the go ahead to such a scheme.

### 2) Parking and active transport

According to the Transport Statement attached to the planning application, Scarborough has been included as one of the six main towns identified as areas needing to tackle congestion. In Scarborough, one of the worst areas is Castle Ward. Day to day, from April to the end of October, parking in Castle Ward is difficult. At the Easter, May and summer holidays, it is nigh on impossible for locals to park. This difficulty is increasing as more homes are being turned into holiday cottages. The 2011

census used for the proposed planning is now 9 years out of date and whilst many locals may still not have cars, the influx of tourists using the holiday cottages certainly has increased the car numbers in the holiday season.

I bring this point up as FutureLets plan to let the accommodation to seasonal visitors to the town in the summer holidays. That's almost 200 more cars in the ward. 200 more cars in an area that only has 630 spaces. Whilst I realise that the park and ride facility will reopen in the summer, the service does not stop outside the market, so will not be a desirable option for many.

As for the students and NHS workers staying there, both in lower income brackets, they will not readily be able to afford the yearly parking permits or public car park prices. They will however, undoubtedly bring cars. According to google maps, the Coventry University site is 1.3 miles away (28 minute walk) and the hospital 1.8 miles away ( 39 minute walk). Warning someone that the site is a car free zone will not deter them from bringing their cars as transport to work and college is vital.

The proposed alternative methods of transport are also not well argued:

The transport document delights in telling us that the Sustrans Cycle Route 1 is **approximately** 500m from the site. In actual fact the Sustrans route starts at Sainsbury's car park. This use of the word approximate is fraudulent, as the same document states that the Railway Station is both 500 and 600m from the site. Sainsbury's as anyone who lives in the town knows, is considerably further away from Market Street than the Railway Station is. Added to this, is the fact that the Sustrans cycle path would be of no help to anyone living at the proposed accommodation when it came to getting to either Coventry University or Scarborough Hospital. This is green wash: disinformation disseminated by an organisation so as to present an environmentally responsible public image.

Bus services are likely to be cut post Covid 19 as funding issues bite. During the pandemic we are being told not to use public transport if possible due to risk of infection. After a year of this, public habits will have changed forever.

'Active transport' ie cycling and walking is not a suitable alternative for NHS staff coming home from a late shift. There are no night time buses, and a 39 minute walk in the early hours isn't an option for women on their own. Student and staff safety is a big issue.

### 3) Noise and disturbance

Student accommodation is not quiet accommodation. Student accommodation is usually provided for year 1 students, those who have just left home and need the safety of a mutual interest community. This means potentially 200 18-20 year olds living on the edge of the town centre, and in Castle Ward. Whilst not wanting to demonise this age group, 18-20 years are not known for being quiet. Eastborough and Newborough are already a nightmare for policing on Friday and Saturday nights. Add potentially 200 more people to this mix and you have a recipe for disaster.

I couldn't find a reference to the demographics of the planned NHS key workers. If these are already trained staff, then it is unlikely that they will put up with the noise from student accommodation. If they are student doctors, then they shouldn't be called NHS key workers. The use of this term is emotive and a cynical ploy, riding on the back of the Covid crisis, to raise a sympathetic response to the planning application.

### 4) Retail unit excess

2020 has been a turning point for the high street which was already struggling. If this proposal goes ahead, it is likely that by the time it is built and in use, Covid 19 will be behind us. However, fundamental changes have occurred this year which leaves the utility of the project in question. During the pandemic, two changes to shopping habits have been made. 1 - people are shopping online, leaving major high street chains bankrupt, their units empty and their staff unemployed. 2 - when shopping, people are using small local stores for their groceries and other needs, or using supermarkets out of the town centre.

The town centre already has plenty of empty shops. I walked through the town this week and counted up all the empty units: A total of 41 that could be let. I haven't included Castle Road, Victoria Road or Falsgrave.

Eastborough: 7 empty units

Newborough: 7 empty, 1 closing down, 2 pop up shops

Brunswick: 3 closing down (Debenhams, Bon Marche, Trespass) 3 closed, 2 units used for display

Westborough: 2 empty, 2 empty with refurbishment ongoing

Albemarle Crescent - 1 empty

Huntriss Row - 5 empty

Bar Street - 4 empty  
North Street - 1 empty (JD sports)  
St Nicholas Street - 1 (large unit)  
St Thomas Street - 2 empty (as far as Matalan)  
Queen Street - 1

Does the town need any more commercial units, however shiny and new they might be? Even if they were let, it would be at the expense of other ones that are already there. This will not enhance the aesthetics of the town centre.

#### 5) Education post Covid

The era of Covid 19 has changed university education dramatically, with most degrees now being studied online. Even when the pandemic is behind us, it is unlikely that the university experience will return to normal. In February this year, several universities had staff on strike about pay, resulting in contact hours being reduced permanently. Then the virus put learning online. It is unlikely that the coffers of universities are full enough to return to normal teaching, with substantial online content being a cheaper option.

The economy is in a state of near collapse, unemployment is increasing daily, and inflation will hit in the next 18 months. A grant is barely enough to live on at university and parental contributions are needed. The ability for parents to top up grants is going to become more difficult and lack of job availability means students will find it harder to get a part time job to fund themselves.

University place uptake will inevitably change with more students opting to study from home.

Will we need this much student accommodation?

#### 6) Market square and green spaces

Somewhere along the way the much loved idea of a market square space has disappeared. This new development does not include a market square or any green space. If there's one thing that the lockdowns and social distancing of 2020 have shown us, it's that outdoor space is critical to our mental health and the cohesion of community.

To reiterate, I OBJECT to this planning application.

Yours sincerely

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