



The Planning Inspectorate

Independent Examination of the Craven Local Plan

Inspector's Matters, Issues and Questions for Examination

Matthew Birkinshaw BA(Hons) Msc MRTPI

Inspector appointed by the Secretary of State

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Introduction

Prior to the forthcoming Hearing sessions responses are invited from participants on the following Matters, Issues and Questions ('MIQs') for Examination. The MIQs are based on the Main Issues identified by the Council, the Inspector's Initial Questions and other relevant issues raised by representors.

Further information about the Examination, Hearings and format of written statements is provided in the accompanying Guidance Note, which should be read alongside the MIQs.

Matter 1 – Compliance with the Act and Regulations, the Habitats Regulations and Strategic Flood Risk Assessment

Issue 1 – Duty to Cooperate

- Q1. What strategic, cross-border matters have arisen through the preparation of the Local Plan and what cooperation took place to resolve them? Has the cooperation between neighbouring authorities been constructive and proactive?
- Q2. What actions were identified as a result of dialogue with neighbouring authorities? What were the outcomes and how did they shape the preparation of the Plan?
- Q3. Is the *Memorandum of Understanding between Craven District Council and the Yorkshire Dales National Park Authority* (Appendix 1 to the *Duty to Cooperate Statement Update*¹) the most up-to-date position on cross-boundary issues relating to housing? Does it reflect the latest evidence on housing needs?
- Q4. How were the levels of 'significance' determined in Chapter 6 of the *Duty to Cooperate Statement Update*? How have they been reflected in the preparation of the Local Plan and dialogue with neighbouring authorities?
- Q5. How were issues surrounding economic growth considered with neighbouring authorities? What actions were identified as necessary as a result of dialogue and what were the outcomes?
- Q6. Has the Duty to Cooperate under sections 22(5)(c) and 33A of the 2004 Act and Regulation 4 of the 2012 Regulations been complied with, having regard to advice contained in the National Planning Policy Framework (the 'Framework') and the National Planning Practice Guidance (the 'PPG')?

Issue 2 – Public Consultation

- Q1. Has public consultation been carried out in accordance with the Council's *Statement of Community Involvement*, the Framework and the PPG, and the requirements of the 2004 Act and 2012 Regulations?
- Q2. Were adequate opportunities made available for participants to access and make comments on the Local Plan, and other relevant documents, in different locations?
- Q3. Were representations adequately taken into account?

Issue 3 – Local Development Scheme ('LDS')

- Q1. Has the Local Plan been prepared in accordance with the LDS?

Issue 4 – Sustainability Appraisal

- Q1. Have the likely environmental, social and economic effects of the Local Plan been adequately assessed in the *Sustainability Appraisal*² ('SA')?

¹ Document SD006

² Document PD007

- Q2. Does the SA test the Plan against all reasonable alternatives, such as different options for the distribution of housing and/or employment growth?
- Q3. What is the justification for the number of dwellings used in Housing Growth Options A to D as set out in the SA? Does the SA test a reasonable range of alternative growth scenarios?
- Q4. The March 2018 SA states that further work on potential visual and ecological impacts are required in respect of site Ref SG064, and would be addressed in an expanded, stand-alone SA. Has this been carried out? How does the SA consider the Yorkshire Dales National Park and the River Ribble (Long Preston Deeps) SSSI?

Issue 5 - Habitats Regulations

Recreational Disturbance

- Q1. How have the potential impacts of recreational disturbance (arising from policies and allocations in the Local Plan) on the North and South Pennine Moors SPA and SACs been considered?
- Q2. The *Habitat Regulations Assessment³ (Iteration II)* ('HRA') states that the screening distances of 7km and 2.5km from the boundary of designated sites has been derived from visitor surveys undertaken in 2013 by Bradford Metropolitan District Council. What is the justification for using the same distances in Craven? Are they robust?
- Q3. Has the Council produced a composite list of all sites identified for development in the Local Plan that fall within 7km of the North Pennine Moors SPA and SAC and/or the South Pennine Moors SPA and SAC?
- Q4. Does the Local Plan refer to the buffer zones of 7km and 2.5km in the HRA? Is it necessary when considering the potential for recreational disturbance?
- Q5. In response to the Inspector's Initial Questions⁴ the Council confirmed that the overall aim is to ensure that there are sufficient amounts of usable, public green space to appropriately meet the increased recreational demand resulting from new development within 7km of SPAs and SACs. How does the Local Plan ensure that this will be achieved as part of proposals for new development?
- Q6. Is it clear to decision-makers, developers and local communities what is required of relevant proposals for development falling within the 7km and 2.5km buffer zones?
- Q7. Is land at Malsis, Glusburn (site Ref SC085) the only allocated site to fall within 2.5km of a SPA or SAC?
- Q8. How does the Local Plan ensure that new residential development on site Ref SC085 will not adversely affect the integrity of the South Pennine Moors SPA and SAC?
- Q9. How would a decision-maker respond to a windfall proposal within 2.5km of a SPA/SAC? Is it clear what would be required?

³ Document HR003

⁴ Document EL1.001a

Air Quality and Transport

- Q10. The HRA confirms that the A59 from Skipton briefly runs within 200m of the North Pennine Moors SPA and SAC to the east of the plan boundary, and therefore the in-combination effects need to be analysed further. In response to the Inspector's Initial Questions⁵ the Council confirmed that Harrogate Borough Council is currently compiling their estimate of HGV flows to Craven along this route. Has this data now been completed, and if so, what does it demonstrate?
- Q11. Will the in-combination threshold figure of 1,000 AADT be reached on the A59 as a result of proposed plans and projects in Craven and Harrogate?
- Q12. In response to the Inspector's Initial Questions the Council also advised that contact has been made with Bradford Metropolitan District Council to establish future traffic flows on the A6068. Is this data now available, and if so, what does it demonstrate?
- Q13. Is an assessment of traffic flows on the A6068 necessary given the distance of the A6068 from the South Pennine Moors SPA and SAC?

Loss of supporting feeding sites to development

- Q14. What criteria have been used to assess the likely impacts of proposed development on feeding sites associated with the North and South Pennine Moors SPA and SAC?
- Q15. What impacts will policies and allocations in the Local Plan have on feeding sites?

Other Conservation Interests

- Q16. What effects will the policies and allocations in the Local Plan have on the:
- Ingleborough Complex SAC;
 - Craven Limestone Complex SAC;
 - North Pennine Dales Meadows SAC; and
 - The Bowland Fells SPA.

⁵ Document EL1.001a

Issue 6 – Strategic Flood Risk Assessment ('SFRA')

- Q1. The *Craven District Council Level 1 Strategic Flood Risk Assessment*⁶ states that "...it has not been possible to assess the impact on flood risk that the *Skipton Flood Alleviation Scheme (FAS)* will have, as the scheme is currently under construction. The FAS is accompanied by a modelling study which will produce revised model outputs and information following completion of the scheme." What is the current status regarding this scheme and what effects will its completion have on policies and allocations in the Local Plan?
- Q2. How has the SFRA taken into account the work carried out by North Yorkshire County Council ('NYCC') which has recorded flooding incidents?
- Q3. The SFRA includes a list of sites recommended for withdrawal from the Local Plan. This includes any site within the functional floodplain where 10% or more is within Flood Zone 3b, or, the scale of surface water risk is considered significant enough that possible mitigation is deemed unlikely to be achievable. The sites include:
- Site Ref SC037 – Land at Ashfield Farm, Cross Hills
 - Site Ref SK049 – Land east of Skipton Bypass, Skipton
 - Site Ref SG084 – Land east of A65, Giggleswick

Based on the findings of the SFRA, what is the justification for the inclusion of sites SC037 and SG049 in the Local Plan?

- Q4. Are the allocations and policies consistent with paragraph 100 of the Framework which states that Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change? How has the Council taken a sequential approach to identifying sites for new housing and employment?
- Q5. If, following application of the Sequential Test, it is not possible, consistent with wider sustainability objectives, for a development to be located in zones with a lower probability of flooding, paragraph 102 of the Framework confirms that the Exception Test can be applied if appropriate. How do the allocations meet the tests set out in national planning policy?

Issue 7 – Presumption in Favour of Sustainable Development – Policy SD1

- Q1. What is the rationale for the inclusion of Policy SD1? Is it necessary and justified given that it broadly repeats paragraph 14 of the Framework?

Issue 8 – Public Sector Equality Duty ('PSED')

- Q1. In what way does the plan seek to ensure that due regard is had to the three aims expressed in s149 of the Equality Act 2010 in relation to those who have a relevant protected characteristic?

⁶ Document FI001

Matter 2 – Objectively Assessed Need and the Housing Requirement (Policy SP1)

Issue 1 – Housing Market Area ('HMA')

- Q1. What evidence supports the use of a HMA for Craven, having particular regard to levels of containment and household migration? Does it accord with national guidance in the PPG?⁷
- Q2. How has evidence relating to commuting patterns been taken into account? Does this support the use of a HMA for Craven?
- Q3. How does the proposed HMA relate to neighbouring authorities?

Issue 2 – Population and Household Projections

- Q1. What is the demographic starting point derived from the 2014-based household projections? How does this compare to the latest mid-year estimates? What are the reasons for the differences?
- Q2. How has the "re-based" scenario (141 dpa) been calculated?
- Q3. Why has the SHMA⁸ assessed internal rates of migration over 6 years and 15 years? What are the reasons for the variation?
- Q4. How does the SHMA consider household formation rates, what are they based on and are they robust?
- Q5. Paragraph 6.11 of the SHMA and the table that follows (Table 6.1) applies a partial return "...in which the 2014-based headship rates for the 25-34 age group return to a mid-point between the 2014 and 2008-based rates by 2033". Have the same adjustments been made for other age groups?
- Q6. What are the main reasons for the change in the demographic starting point from the 2016 SHMA Update⁹ (188 dwellings)?
- Q7. How has the need for accommodation for older people, especially older people who want to stay in their own home, been taken into account in establishing the housing requirement? Is this set out in the Local Plan?

Issue 3 – Market Signals

- Q1. The PPG¹⁰ advises that household projections should be adjusted to reflect appropriate market signals, as well as other market indicators. How does the evidence demonstrate that Craven is performing with regard to:
 - Land prices;
 - House prices;
 - Rents;
 - Affordability;
 - Rate of development; and

⁷ Paragraph: 011 Reference ID: 2a-011-20140306

⁸ Document Ho013

⁹ Document Ho012

¹⁰ Paragraph: 019 Reference ID: 2a-019-20140306

- Overcrowding.

Issue 4 – Affordability

- Q1. How has affordability been assessed as part of the SHMA? How does the House Price Ratio and the Rental Affordability Ratio compare with neighbouring authorities and the national average?
- Q2. How have ratios determined the level of uplift proposed to the demographic starting point? Is the proposed uplift justified and based on available evidence?
- Q3. What impact will the proposed uplift have on issues relating to affordability in Craven?

Issue 5 – Future Economic Activity

- Q1. The PPG advises that plan makers should also make an assessment of the likely change in job numbers based on past trends and/or economic forecasts as appropriate.¹¹
- What is the justification for the different employment –led growth scenarios in the SHMA? (paragraph 6.16)
- Q2. Has the SHMA taken into account possible economic growth based on an assessment of past take-up rates? If so, how does this differ? What are the implications for the OAN and housing requirement?

Issue 6 – Yorkshire Dales National Park Authority

- Q1. What is the justification for the estimated level of growth likely to take place in the Yorkshire Dales National Park (15%)? What is it based on and is it robust?
- Q2. What level of agreement has the Council reached with the National Park Authority regarding the use of a 15% figure?
- Q3. Does the adopted development plan for the National Park set out a housing requirement for the area falling 'within' Craven?
- Q4. How does the 15% compare with planned levels of growth in the National Park? Can it be delivered?
- Q5. How does the Local Plan for Craven ensure that the full objectively assessed needs for housing across the District will be met?

Issue 7 – Housing Requirement

- Q1. Is the housing requirement justified and is it based on robust, up-to-date and available evidence? If not, what should the housing requirement be, and how have alternative figures been calculated?

¹¹ Paragraph: 018 Reference ID: 2a-018-20140306

Matter 3 – Affordable Housing Need (Policy H2)

Issue 1 – Definition of Affordable Housing

- Q1. Does the Plan include a definition of affordable housing? If not, in order to be effective should one be included?

Issue 2 – Affordable Housing Need

The SHMA states that there is an annual imbalance of 126 affordable dwellings per year. This is expressed as the overall need from the housing register compared with the current supply of affordable housing. In response, Policy H2 requires a minimum of 30% of dwellings on qualifying sites to be affordable.

- Q1. What is the difference between the affordable housing need identified in Policy H2, and the uplift applied to the demographic starting point to reflect affordability issues in Policy SP1?
- Q2. What is the justification for requiring 30% affordable housing on qualifying sites? What is this based on, how was it calculated and what alternatives were considered?
- Q3. Based on the requirements for qualifying developments to provide 30% affordable housing, how many affordable homes is the Local Plan expected to deliver?
- Q4. How does this compare to the identified need?
- Q5. How does this compare to previous performance? How many affordable homes have been provided as a percentage of total output over the past 5-10 years?
- Q6. The PPG states that an increase to the total housing figures should be considered where it would help deliver the required number of affordable homes. Has an uplift to the housing requirement for this reason been considered? If so, where is this set out?
- Q7. What is the justification for requiring proposals of 6-10 dwellings on greenfield sites in designated rural areas to make an equivalent financial contribution?

Issue 3 – Viability

- Q1. How have the residential typology assumptions been defined in the *Local Plan Viability Assessment* and *Local Plan Viability Assessment Addendum Report*?¹² Do the scenarios for Skipton (up to 290 units) and the rest of the District (up to 150 units) reflect the allocations in the Plan?
- Q2. How have existing use values been determined? Are they based on appropriate available evidence?
- Q3. How have infrastructure costs and other contributions been taken into account in the calculation of scheme viability?
- Q4. Is the 30% affordable housing requirement viable for all types of housing, supported by viability evidence?

¹² Document Ec005

Matter 4 – Spatial Strategy and Housing Growth (Policy SP4)

Issue 1 – Settlement Hierarchy

Paragraph 4.37 of the Local Plan states that Skipton is by far the largest town in the District and contains the administrative functions of the District Council, along with a range of employment opportunities, goods and services.

Below Skipton (Tier 1), the hierarchy includes a further 4 tiers as follows;

- Key Service Centres – High and Low Bentham and Settle;
- Local Service Centres – Gargrave, Glusburn and Crosshills and Ingleton;
- Villages with Basic Services and Villages with Basic Services Bisected by the Yorkshire Dales National Park Boundary; and
- Small Villages, Hamlets and Open Countryside

- Q1. How was the hierarchy established?
- Q2. Does it take into account sufficient factors? Is the hierarchy of settlements consistent with the Framework which seeks to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable?
- Q3. Have settlements been appropriately identified in the hierarchy?
- Q4. What is the justification for identifying Villages with Basic Services Bisected by the Yorkshire Dales National Park Authority (Tier 4b) separately from other Villages (Tier 4a)? Does the Local Plan propose a different approach for development falling in Tiers 4a and 4b?
- Q5. How were villages in Tiers 4 and 5 determined? What factors were taken into account in deciding whether or not a village was identified in Policy SP4?

Issue 2 – Housing Growth

- Q1. How was the distribution of housing growth between the settlements established, and what evidence supports it? Is it justified?
- Q2. How does the distribution of housing growth take into account the proximity of settlements to one another? For example, how has the location of services in Settle taken into account when considering housing growth in Giggleswick?
- Q3. Are the levels of growth appropriate and justified having regard to the size, role, function, and accessibility of each settlement to employment, services and facilities?
- Q4. Considering the predominantly rural geography of the District, is it appropriate to focus 50% of the housing growth in Skipton, and almost 72% across Skipton, Low and High Bentham and Settle?
- Q5. How will the spatial distribution of housing support sustainable communities in the Local Service Centres and Villages? Is Policy SP4 consistent with

paragraph 55 of the Framework? Will there be enough growth in small, medium and large villages to help support sustainable rural communities?

- Q6. What is the justification for the very prescriptive levels of housing growth between Tiers 2-4? For example, why is each of the Local Service Centres attributed 10.9% growth and Local Service Centres 3.5%?
- Q7. What is the justification for the level of housing growth proposed in each of the Tier 4 settlements?
- Q8. What is the justification for identifying Bolton Abbey and Long Preston in Tier 4, but not identifying any housing growth in the settlements?
- Q9. Where is the proposed level of housing growth going to come from in the 'Other Villages and Open Countryside' (6%)? How will it be distributed?

Issue 3 – Housing Growth on Non-allocated sites

Land within Settlements

- Q1. What are the reasons for not defining the boundaries of settlements on the Policies Map? Will it be clear to decision-makers, developers and local communities whether a site falls within the main built up area?
- Q2. What is the justification for supporting proposals for new development on non-allocated sites within Tier 1-4 settlements provided that they relate to previously developed land?
- Q3. How would a decision-maker react to a proposal for new residential development on previously undeveloped land within the main built-up area of a Tier 1-4 settlement?

Land adjoining Settlements

- Q4. Policy SP4 I) supports the release of non-allocated sites adjoining the main built up area of settlements where a) to c) are met. Does the policy apply to all settlements, or just Tiers 1-4? As submitted is this clear?
- Q5. The main built up area is defined as the "*continuous built form*" of a settlement. Is this sufficiently clear to decision-makers, developers and local communities? Is the policy effective?
- Q6. What is the justification for restricting proposals for new development coming forward under Policy SP4 I) unless it can be demonstrated that the planned growth for that settlement will not be delivered?
- Q7. How does this requirement relate to Policy SP1 which sets out a minimum (rather than a maximum) housing requirement?
- Q8. How will a decision-maker determine whether or not the planned level of housing growth in a particular settlement will be delivered within the plan period for the purposes of Policy SP4 I)? How will Table 5 be updated?
- Q9. Where planning permission has been granted for new residential development in a settlement, but has not come forward, how would a decision-maker react to a proposal for housing under Policy SP4 I)?
- Q10. Does the policy, or other applicable policies in the Local Plan, encourage the effective use of previously developed (brownfield) land?

- Q11. What are the "special economic, environmental and/or social circumstances" for the purposes of Policy SP4 I)? Is this clear to decision-makers, developers and local communities? Is the policy effective?

Tier 5 Settlements

- Q12. How will a decision-maker determine whether or not a proposal for new development is "*consistent with the role and function of the settlement*" for the purposes of Policy SP4 I) i)?
- Q13. What is the justification for Policy SP4 I) vi)? How does this relate to the spatial strategy and principle of new residential development in or adjoining settlements?
- Q14. Policy SP4 J) supports proposals for housing in Tier 5 settlements subject to meeting criteria a) to e). However, Tier 5 settlements are not listed in Policy SP4. How will decision-makers, developers and local communities determine when part J) applies?
- Q15. Is Policy SP4 J) intended to apply to even very small clusters of houses with no shops, services or facilities?

Residential Development Outside Settlements

- Q16. How is the 'countryside' defined for the purposes of Policy SP4? How would a decision-maker determine whether or not a site falls within the countryside, or a Tier 5 settlement such as a hamlet?
- Q17. What is the justification for requiring proposals for new development to accord with the Framework under Policy SP4 K), and, then meet criteria i) to iii)?
- Q18. How does Policy SP4 allow for circumstances where the design of a new dwelling is of an exceptional quality? Is Policy SP4 consistent with the Framework in this regard?

Matter 5 – Residential Allocations (Policies SP5, SP6, SP7, SP8, SP9, SP10 and SP11)

Issue 1 – Methodology

- Q1. How were different sites considered for inclusion as allocations? What process did the Council follow in deciding which sites to include?
- Q2. How was the spatial distribution of allocations determined? How do they relate to the housing strategy and settlement hierarchy under Policy SP4?
- Q3. How did the guidelines for housing growth between settlements in Policy SP4 determine the number and size of sites?
- Q4. How were site areas and dwelling capacities determined? Are the assumptions justified and based on available evidence?
- Q5. What is the justification for including a very specific, net site area for allocated sites? Is this sufficiently flexible to allow proposals for new development to be deliverable?
- Q6. What contingency arrangements does the Plan include should some of the larger sites not come forward as expected?
- Q7. Are there any factors which indicate that a site(s) should not have been allocated for development? Are all of the sites developable within the plan period?
- Q8. Why do some allocations require a Landscape Visual Impact Assessment ('LVIA') to be carried out, but others do not, such as site Refs IN010, IN022, IN028, IN029 and IN035?
- Q9. How has the effect of allocations on the availability of the best and most versatile agricultural land been assessed?
- Q10. How has the effect of allocations on the local and strategic road network been assessed? Where specific mitigation has been identified as necessary is this set out in the relevant policies?
- Q11. How has the effect of allocations on the natural and built environment been taken into account, including biodiversity, geodiversity and heritage assets?
- Q12. Was the site selection process robust? Was an appropriate selection of potential sites assessed, and were appropriate criteria taken into account?
- Q13. Are the allocations justified, effective and consistent with national policy?

Issue 2 – Strategy for Skipton – Tier 1 (Policy SP5)

SK013 – Land east of Aldersley Avenue and south of Moorview Way

- Q1. The *Craven Local Plan Residential Site Selection Process Background Paper*¹³ states that there may be areas of archaeological significance beneath the site, which subject to the outcomes of site investigations, may possibly reduce the site's area. How has this determined the site area and dwelling capacity?
- Q2. Taking into account the possibility for archaeological remains, is the provision of 100 dwellings deliverable?

SK015 – Cefn Glas, Shortbank Road

- Q3. What is the justification for limiting the site area to 0.442ha, in contrast to the site area considered as part of the *Strategic Housing Land Availability Assessment*¹⁴ ('SHLAA')?

SK044 – Former allotments and garages, Broughton Road

- Q4. What is the fluvial and/or surface water hazard identified in the supporting text to Policy SP5? Is the allocation consistent with paragraph 100 of the Framework, which states that Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property?
- Q5. Is it clear to decision-makers, developers and local communities what is required of proposals for new development, having particular regard to flood risk?
- Q6. Is the site deliverable within the plan period for 19 dwellings?

SK058 – Whitakers Chocolate Factory

- Q7. What is the current status regarding the site, is it still actively used for employment purposes? If so, is the site available for development?
- Q8. How have the effects of residential development on designated heritage assets been taken into account?
- Q9. Considering the requirement to retain the two villa-style houses and boundary walls on Upper Street, is the delivery of 16 dwellings feasible?

SK060 – Business premises and land west of Firth Street

- Q10. What is the current status regarding the site, is it still actively used for employment purposes? If so, is the site available for development?
- Q11. How have the effects of residential development on designated heritage assets been taken into account?

¹³ Document Ho007

¹⁴ Document Ho010

SK061 – Land west of Sharphaw Avenue

- Q12. Policy SP5 states that the width of the existing Horse Close Bridge is currently restricted, and therefore would need to be widened (or a new bridge provided) to serve the allocation. What assessments have been carried out to determine whether such works would be feasible and viable?
- Q13. Taking into account the access constraints of the site, is the allocation deliverable?
- Q14. Is the site expected to come forward in conjunction with, or alongside Site Refs SK101 and SK114/124, which also potentially require bridge widening and/or a new crossing over the Leeds & Liverpool Canal?

SK081, SK082 and SK108 – Land north of Gargrave Road and west of Park Wood Drive and Stirtonber

- Q15. What is the justification for allocating part of the site for a new primary school? How will this be delivered, by whom and when? Is it clear to decision-makers, developers and local communities what is required of proposals for new development?
- Q16. How has the suitability of the site to accommodate a new primary school been assessed?
- Q17. What contingency plans does Policy SP5 put in place should the new primary school no longer be required?
- Q18. Taking into account the land required for a new school, is the provision of 324 dwellings deliverable?
- Q19. What is the justification for including an area of green infrastructure running along the north and western site boundary?
- Q20. What is the justification for requiring the production of a masterplan for the site? Is it clear who will be responsible for producing the masterplan and/or what it should contain?
- Q21. How will the necessary infrastructure be provided on the site? Should this be set out in the Plan?

SK087 – Land north of A6131 and south of A65

- Q22. What is the fluvial and/or surface water hazard identified in the supporting text to Policy SP5? Is the allocation consistent with paragraph 100 of the Framework, which states that Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property?
- Q23. What is the justification for requiring a pedestrian link alongside the A6131 to the bus stop at Overdale Static Caravan Site?
- Q24. What is the justification for excluding an area of Local Green Space around the periphery of the site? How will this affect the ability to provide a new access and pedestrian footway along the A6131, and have houses front onto the road as required by Policy SP5?

SK088 – Hawbank Fields north of Otley Road and south of A6131

- Q25. What is the current status regarding planning application Ref 2017/18237/OUT?
- Q26. What is the fluvial and/or surface water hazard identified in the supporting text to Policy SP5? Is the allocation consistent with paragraph 100 of the Framework, which states that Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property?

SK089 and SK090 – Land north of Airedale Avenue and Elsey Croft and east of Railway Line

- Q27. What is the justification for allocating part of the site for a new primary school? How will this be delivered, by whom and when?
- Q28. Is it clear to decision-makers, developers and local communities where the proposed new primary school will be located?
- Q29. What evidence has been produced to demonstrate that a new school and 218 dwellings can be delivered taking into account site constraints such as the topography, existing infrastructure and land ownerships?
- Q30. Taking into account the land required for a new school, is the provision of 218 dwellings deliverable?
- Q31. What is the fluvial and/or surface water hazard identified in the supporting text to Policy SP5? Is the allocation consistent with paragraph 100 of the Framework, which states that Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property?

SK094 – Land bounded by Carleton Road, the railway line and the A629

- Q32. Is the allocation consistent with paragraph 100 of the Framework, which states that Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property?
- Q33. What is the current situation regarding the Skipton Flood Alleviation Scheme? What is the scheme and what effect is it likely to have on the part of the allocation falling within Flood Zones 2 and 3?

SK101 – Land east of Keighley Road and south of Cawder Lane

- Q34. Policy SP5 states that the width of the existing Horse Close Bridge is currently restricted, and therefore would need to be widened (or a new bridge provided) to serve the allocation. What assessments have been carried out to determine whether such works would be feasible and viable?
- Q35. Taking into account the access constraints of the site, is the allocation deliverable?
- Q36. Is the site expected to come forward either in conjunction with, or alongside Site Refs SK061 and SK114/124, which also potentially require bridge widening and/or a new crossing over the Leeds & Liverpool Canal?

SK114 and SK124 – Land north east of North Parade and Cawder Road garage

- Q37. What is the current status regarding planning permission Ref 63/2016/15503?
- Q38. Is access to the site expected to be taken from Cawder Road and/or the existing reservoir track from Whinny Gill Road? At present is it clear to decision-makers, developers and local communities? Is the policy effective?
- Q39. Policy SP5 states that the width of the existing Horse Close Bridge is currently restricted, and therefore would need to be widened (or a new bridge provided) to serve the allocation. What arrangements are proposed/approved for the site under planning permission Ref 63/2016/15503?
- Q40. Taking into account the access constraints of the site, is the allocation deliverable?

Issue 3 – Strategy for Settle - Tier 2 (Policy SP6)

SG021, SG066 and SG080 – Land north-west and south-west of Penny Green

- Q1. Is it clear to decision-makers, developers and local communities what the heritage assets are for the purpose of Policy SP6? Is the policy effective in this regard?
- Q2. Is the site accessible from Penny Green, and if not, is it clear to decision-makers, developers and local communities what is required from access proposals taken from the B6480?

SG025 – Land south of Ingfield Lane

- Q3. What is the current status regarding the planning application submitted to the Council in April 2017 (Ref 62/2017/18067)?
- Q4. What is the justification for specifying that proposals for development on the site must include tree blocks between clusters of dwellings? Does this provide sufficient flexibility to ensure that the site is deliverable?
- Q5. What is the fluvial and/or surface water hazard identified in the supporting text to Policy SP6? Is the allocation consistent with paragraph 100 of the Framework, which states that Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property?

SG027 and SG068 – Land south of Brockhole View and west of Brockhole Lane

- Q6. How does site Ref SG027/SG068 relate to the adjacent parcel of land to the north-east which benefits from planning permission for residential development under Ref 62/2015/16414?
- Q7. What is the current status regarding planning application Ref 62/2016/17447?
- Q8. How does the area of green infrastructure referred to in Policy SP6 relate to approved plans for the site?

- Q9. What is the justification for specifying that proposals for development on the site must include tree blocks between clusters of dwellings? Does this provide sufficient flexibility to ensure that the site is deliverable?

SG032 – Car Park off Lower Greenfoot and Commercial Street

- Q10. What is the current use of the site? What effect will the proposed allocation have on the availability of car parking in the area?
- Q11. How would the proposed allocation affect the attractiveness of Settle as a visitor destination?
- Q12. Is it clear to decision-makers, developers and local communities what is expected in relation to the management of surface water run-off?

SG035 – F H Ellis Garage

- Q13. How does the density of development relate to the housing mix set out in Policy SP3?
- Q14. What is the justification for restricting the site to specialist accommodation for older people?
- Q15. Is it clear to decision-makers, developers and local communities what the relevant listed buildings and conservation areas are under Policy SP6?
- Q16. Is it clear to decision-makers, developers and local communities what is expected in relation to the management of surface water run-off?
- Q17. What is the justification for requiring access to be taken from High Hill Grove Street to the rear?

SG079 – Land north of Town Head Way

- Q18. What is the justification for the extent of green infrastructure proposed to the north and east of the site?
- Q19. What is the justification for retaining the existing dry stone boundary walls and creating a new dry stone wall to enclose the field to the north?
- Q20. What is the justification for requiring the layout of any potential future development to retain views of the Watershed Mill chimney, and to specifically "leave gaps" through the site from east to west?

SG042 – NYCC Depot, Kirkgate

- Q21. Is it clear to decision-makers, developers and local communities what the relevant listed buildings and conservation areas are under Policy SP6?

LA004 – Land North of Barrel Sykes

- Q22. What is the justification for requiring the layout of any potential future development to retain views of the Watershed Mill chimney?
- Q23. What is the justification for restricting building heights to 2-storeys and specifying that houses should be front facing and set back from Langcliffe Road?
- Q24. What is the justification for retaining the existing dry stone boundary walls and creating a new dry stone wall to enclose the field to the north?

SG060 – Northern part of Sowarth Industrial Estate

- Q25. Policy SP6 allocates the site for "*commercially led including employment, retail, leisure and some residential uses*". Is it clear to decision-makers, developers and local communities what uses are permitted? In particular, how many dwellings are allocated on the site?
- Q26. How does the Local Plan ensure that development of the site will come forward in a planned and coordinated manner?
- Q27. Is it clear to decision-makers, developers and local communities what "*key stakeholders*" would require involvement in any masterplanning exercise for the site?

Issue 4 – Strategy for Bentham - Tier 2 (Policy SP7)

HB011 – Primary School east of Robin Lane and west of Lowcroft

- Q1. What is the current status regarding the proposed High Bentham Conservation Area?
- Q2. Is it clear to decision-makers, developers and local communities what the relevant heritage assets are for the purposes of Policy SP7?
- Q3. What is the current status regarding the playing fields associated with the former school? Is the allocation consistent with paragraph 74 of the Framework concerning the development of existing open space, sports and recreational buildings and land, including playing fields? How does the proposed allocation meet the tests set out in the Framework?
- Q4. How does the density of development relate to the housing mix set out under Policy SP3?
- Q5. What is the justification for restricting the site to extra care dwellings?
- Q6. Is it clear to decision-makers, developers and local communities where access to the site will be taken from?
- Q7. Is it clear to decision-makers, developers and local communities how the design will "*take account of impacts on the Forest of Bowland AONB*"?
- Q8. Is it clear to decision-makers, developers and local communities what is expected in relation to the management of surface water run-off?

HB023 – Land north of Low Bentham Road

- Q9. What is the surface water hazard identified in the supporting text to Policy SP7? Is the allocation consistent with paragraph 100 of the Framework, which states that Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property?
- Q10. Is it clear to decision-makers, developers and local communities how the design will "*take account of impacts on the Forest of Bowland AONB*"?

HB024 – North of Lakeber Drive

- Q11. How, and from where, will the site be accessed?

- Q12. What is the justification for requiring a means of access for emergency vehicles to be taken through the allocated site into site Ref HB052? What about other vehicles and pedestrians/cyclists?
- Q13. Is it clear to decision-makers, developers and local communities how green linkages will be secured across sites HB024, HB044 and HB052?
- Q14. How does the Local Plan ensure that the three adjoining sites come forward in a consistent and coherent manner, having regard to emergency vehicle access and green infrastructure?
- Q15. How does the Local Plan ensure that any potential delays in bringing forward the allocation does not prejudice the delivery of adjacent sites?
- Q16. Is it clear to decision-makers, developers and local communities what is expected in relation to the management of surface water run-off?
- Q17. Is it clear to decision-makers, developers and local communities how the design will *"take account of impacts on the Forest of Bowland AONB"*?

HB025 – Land east of Butts Lane

- Q18. What is the surface water hazard identified in the supporting text to Policy SP7? Is the allocation consistent with paragraph 100 of the Framework, which states that Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property?
- Q19. Is it clear to decision-makers, developers and local communities how the design will *"take account of impacts on the Forest of Bowland AONB"*?

HB026 – Land north of Springfield Crescent and East of Butts Lane

- Q20. What is the surface water hazard identified in the supporting text to Policy SP7? Is the allocation consistent with paragraph 100 of the Framework, which states that Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property?
- Q21. What is the current status regarding applications for planning permission on the site?
- Q22. Is it clear to decision-makers, developers and local communities how the design will *"take account of impacts on the Forest of Bowland AONB"*?

HB036 – Land east of Robin Lane

- Q23. What is the site currently used for? Is it surplus to requirements as overflow car parking for the golf club?
- Q24. What effects will the allocation have the on the availability of car parking for the golf club?
- Q25. What are the *"risks of groundwater emergence"* identified in the supporting text to Policy SP7? Is the allocation consistent with paragraph 100 of the Framework, which states that Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property?

- Q26. Is it clear to decision-makers, developers and local communities how the design will *"take account of impacts on the Forest of Bowland AONB"*?

HB038 – Land south of Low Bentham Road

- Q27. What is the justification for allocating part of the site for an expansion to the primary school? How will this be delivered, by whom and when?
- Q28. Taking into account the land required for the primary school extension, is the provision of 19 dwellings deliverable?
- Q29. Is it clear to decision-makers, developers and local communities how the design will *"take account of impacts on the Forest of Bowland AONB"*?

HB044 – Land west of Goodenber Road

- Q30. How will access be gained to the proposed allocation? Is it deliverable?
- Q31. How does the Local Plan ensure that any potential delays in bringing forward site Ref HB024 does not prejudice the delivery of the allocation?
- Q32. How does the Local Plan ensure that the three adjoining sites come forward in a consistent and coherent manner, having regard to vehicle access and green infrastructure?
- Q33. What is the justification for requiring a Flood Risk Assessment to be provided?
- Q34. Is it clear to decision-makers, developers and local communities how the design will *"take account of impacts on the Forest of Bowland AONB"*?

HB052 – Land North West of Bank Head Farm and South of Ghyllhead Farm

- Q35. What is the justification for requiring a means of access for emergency vehicles to be taken through site Ref HB024? What about other vehicles and pedestrians/cyclists?
- Q36. How does the Local Plan ensure that any potential delays in bringing forward site Ref HB024 does not prejudice the delivery of the allocation?
- Q37. How does the Local Plan ensure that the three adjoining sites come forward in a consistent and coherent manner, having regard to vehicle access and green infrastructure?
- Q38. What is the surface water hazard identified in the supporting text to Policy SP7? Is the allocation consistent with paragraph 100 of the Framework, which states that Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property?
- Q39. Is it clear to decision-makers, developers and local communities how the design will *"take account of impacts on the Forest of Bowland AONB"*?

LB012 – Wenning View, Low Bentham Road

- Q40. Is it clear to decision-makers, developers and local communities what is expected in relation to the management of surface water run-off?
- Q41. Is it clear to decision-makers, developers and local communities how the design will *"take account of impacts on the Forest of Bowland AONB"*?

- Q42. What is the justification for requiring an assessment of the site's archaeological interest on this site, but not others within Bentham?

Issue 5 – Strategy for Glusburn/Crosshills - Tier 3 (Policy SP8)

SC085 – Land at Malsis

- Q1. What is the current status regarding development proposals for the site?
- Q2. Is it clear to decision-makers, developers and local communities what is proposed for the site under the heading "*an element of C2 institutional and/or C3 residential*"?
- Q3. In contrast to other allocations, why does Policy SP8 set out a minimum number of dwellings for the site? Is it clear how many dwellings will be permitted?
- Q4. How have the effects of residential development on the integrity of the South Pennine Moors Phase 2 SPA been considered, having particular regard to loss of habitat and recreational disturbance?
- Q5. Has an assessment been carried out to determine whether or not foraging SPA species are using the site?
- Q6. Is it clear to decision-makers, developers and local communities what is required in the provision of "*extensive areas of green infrastructure*"? Is the policy effective in this regard?
- Q7. What is the fluvial and/or surface water hazard identified in the supporting text to Policy SP8? Is the allocation consistent with paragraph 100 of the Framework, which states that Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property?
- Q8. Based on the constraints identified in the supporting text to Policy SP8, is the site deliverable?

SC037(a) – Land at Ashfield Farm

- Q9. Is the allocation a brownfield or greenfield site? How was this taken into account in the site selection process?
- Q10. Is it clear to decision-makers, developers and local communities what is expected in relation to the management of surface water run-off?

Issue 6 – Strategy for Ingleton - Tier 3 (Policy SP9)

IN006 – CDC Car Park, Backgate

- Q1. What is the current use of the site? What effect will the proposed allocation have on the availability of car parking in the area?
- Q2. Is it clear to decision-makers, developers and local communities what the relevant listed buildings and conservation areas are under Policy SP9?
- Q3. What is the fluvial and/or surface water hazard identified in the supporting text to Policy SP9? Is the allocation consistent with paragraph 100 of the Framework, which states that Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property?

IN010 – Caravan Park, north of River Greta

- Q4. Is it clear to decision-makers, developers and local communities what the relevant listed buildings and conservation areas are under Policy SP9? Does the site fall within a conservation area?
- Q5. Is it clear to decision-makers, developers and local communities what the provision of "*social infrastructure*" would entail for the purposes of Policy SP9? Is the policy effective in this regard?
- Q6. What is the fluvial and/or surface water hazard identified in the supporting text to Policy SP9? Is the allocation consistent with paragraph 100 of the Framework, which states that Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property?
- Q7. How has the effect of residential on the character and form of the settlement been considered, having particular regard to the provision of new housing on the western side of the River Greta?

IN028 – Land between Ingleborough Park Drive and Low Demesne

- Q8. Is it clear to decision-makers, developers and local communities what the relevant listed buildings and conservation areas are under Policy SP9?
- Q9. Is it clear to decision-makers, developers and local communities what the provision of "*social infrastructure*" would entail for the purposes of Policy SP9? Is the policy effective in this regard?
- Q10. What is the fluvial and/or surface water hazard identified in the supporting text to Policy SP9? Is the allocation consistent with paragraph 100 of the Framework, which states that Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property?
- Q11. What is the area of biodiversity value in the western part of the site? How has this been assessed to determine the suitability of the site for new residential development?

IN029 – Land east of New Village and south of Low Demense

- Q12. Is it clear to decision-makers, developers and local communities what the relevant listed buildings and conservation areas are under Policy SP9?
- Q13. Is it clear to decision-makers, developers and local communities what the provision of "*social infrastructure*" would entail for the purposes of Policy SP9? Is the policy effective in this regard?
- Q14. What is the fluvial and/or surface water hazard identified in the supporting text to Policy SP9? Is the allocation consistent with paragraph 100 of the Framework, which states that Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property?
- Q15. How has the effect of new residential development on the character and appearance of the area been considered through the allocation process, having particular regard to landscape sensitivity?

IN049 – Former Playing Fields, Ingleton Middle School

- Q16. Is it clear to decision-makers, developers and local communities what type of housing is proposed on the site?
- Q17. What is the current status regarding the playing fields associated with the former school? Is the allocation consistent with paragraph 74 of the Framework concerning the development of existing open space, sports and recreational buildings and land, including playing fields? How does the proposed allocation meet the tests set out in the Framework?
- Q18. Is it clear to decision-makers, developers and local communities what the relevant listed buildings and conservation areas are under Policy SP9?
- Q19. Is it clear to decision-makers, developers and local communities what the provision of "*social infrastructure*" would entail for the purposes of Policy SP9? Is the policy effective in this regard?
- Q20. What is the fluvial and/or surface water hazard identified in the supporting text to Policy SP9? Is the allocation consistent with paragraph 100 of the Framework, which states that Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property?

Issue 7 – Strategy for Gargrave - Tier 3 (Policy SP10)

GA009 – Land off Eshton Road

- Q1. What is the justification for the proposed site boundary, which excludes certain parcels of land to the rear of Eshton Road, but includes others?
- Q2. What is the justification for identifying the site for extra care units?
- Q3. How has the accessibility of the site by non-car modes been taken into account?
- Q4. What is the current status regarding the Gargrave Neighbourhood Plan? Is the site identified for residential development in the NP?
- Q5. Is it clear to decision-makers, developers and local communities what the relevant listed buildings and conservation areas are under Policy SP10?
- Q6. Is it clear to decision-makers, developers and local communities what the provision of "*social infrastructure*" would entail for the purposes of Policy SP10? Is the policy effective in this regard?
- Q7. What is the fluvial and/or surface water hazard identified in the supporting text to Policy SP10? Is the allocation consistent with paragraph 100 of the Framework, which states that Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property?

GA031 – Land West of Walton Close

- Q8. How has the accessibility of the site by non-car modes been taken into account?
- Q9. What is the current status regarding the Gargrave Neighbourhood Plan? Is the site identified for residential development in the NP?

- Q10. Is it clear to decision-makers, developers and local communities what the relevant listed buildings and conservation areas are under Policy SP10?
- Q11. Is it clear to decision-makers, developers and local communities what the provision of "social infrastructure" would entail for the purposes of Policy SP10? Is the policy effective in this regard?
- Q12. What is the fluvial and/or surface water hazard identified in the supporting text to Policy SP10? Is the allocation consistent with paragraph 100 of the Framework, which states that Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property?

Issue 8 – Strategy for Tier 4A and 4B Villages (Policy SP11)

BU012 – Richard Thornton’s CE Primary School, Burton-in-Lonsdale

- Q1. What is the justification for restricting new build development to the rear of the site? Is this clear to decision-makers, developers and local communities?

BR016 – Land West of Gilders, Langholme Skipton Road, Low Bradley

- Q2. How has the site area been defined, and how will it create a strong boundary to the north of the settlement?

SG014 – Land at Lords Close, Giggleswick

- Q3. Is the allocation consistent with paragraph 74 of the Framework concerning development on existing open space, sports and recreational buildings and land, including playing fields? How does the allocation meet the tests set out in the Framework?
- Q4. Based on the answer to question 3 above, is the site deliverable?

CN006 – Station Works, Cononley

- Q5. What is the current status regarding redevelopment proposals for the site?
- Q6. Is it clear to decision-makers, developers and local communities what uses are permitted across the site and where they are to be located? Is the policy effective in this regard?
- Q7. How has the total number of dwellings been determined, taking into account the necessary retention of the mill buildings?
- Q8. What assessments have been carried out to determine the feasibility and viability of converting the mill buildings? Is the site deliverable?
- Q9. What is the fluvial and/or surface water hazard identified in the supporting text to Policy SP11? Is the allocation consistent with paragraph 100 of the Framework, which states that Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property?

Matter 6 – Housing Land Supply

Issue 1 – The Five Year Housing Land Requirement

- Q1. What is the basic five-year housing land requirement, what is it based on and how has it been calculated?
- Q2. How does the five-year housing land requirement compare to previous rates of delivery?

Paragraph 47 of the Framework states that to boost significantly the supply of housing, local planning authorities should identify and update annually a deliverable five-year supply of housing, with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and completion in the market for land. Where there has been a record of persistent under delivery this should be increased to 20% to provide a realistic prospect of achieving the planned supply and also to ensure choice and competition in the market for land.

- Q3. Taking a longer-term view, how has the Council performed against previous annual housing requirements? Does this represent the 'persistent undersupply' defined by the Framework? In this context, should the buffer be 5% or 20%?
- Q4. If a 20% buffer applies, should this be applied to the basic five-year requirement, or the five-year requirement and any undersupply?
- Q5. If there has been an undersupply, should this be addressed within the next five years (the 'Sedgefield' method), or over the remainder of the plan period (the 'Liverpool' method)? Is the Council's approach consistent with the PPG which advises that local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible?¹⁵
- Q6. Taking the above into account, what is the five-year housing land requirement?

Issue 2 – Supply Methodology

The PPG¹⁶ states that planning permission or allocation in a development plan is not a prerequisite for a site being deliverable in terms of the five-year supply. Local planning authorities will need to provide clear evidence to support the deliverability of sites, ensuring that judgements on deliverability are clearly and transparently set out.

The PPG¹⁷ also advises that the size of sites will be an important factor in identifying whether or not a housing site is deliverable within five years. Plan makers should consider lead-in times and build-out rates to ensure a robust five-year housing land supply. Taking this into account:

¹⁵ Paragraph: 035 Reference ID: 3-035-20140306

¹⁶ Paragraph: 031 Reference ID: 3-031-20140306

¹⁷ Paragraph: 031 Reference ID: 3-031-20140306

- Q1. What evidence is there to indicate that the sites with planning permission will come forward as illustrated in the *Craven Local Plan Housing Trajectory 2012 to 2032 (2018 Update for Submission)*¹⁸?
- Q2. Are there any sites in the Housing Trajectory which have a resolution to grant planning permission subject to the completion of a planning obligation? If so, how has this been taken into account in determining deliverability?
- Q3. How does the Housing Trajectory take into account sites with outline planning permission, compared to sites with full planning permission?
- Q4. What lead-in times and build-out rates have been applied to sites with planning permission?
- Q5. Have the same lead-in times and build-out rates been used for sites across Craven? If so, is this appropriate and justified?
- Q6. How has the Council calculated the deliverability of sites without planning permission? Have different lead-in times and build-out rates been used?
- Q7. How has the Housing Trajectory taken into account that some sites may not come forward due to unforeseen circumstances. Has a lapse-rate or allowance for non-deliverability been applied? If so, has it been applied to all sites?
- Q8. Based on the latest evidence available, is the estimated delivery of sites realistic, reasonable and justified?

Issue 3 – Components of Supply

- Q1. What is the justification for including 93 dwellings coming forward within the first 5 years at Station Works, Cononley (site Ref CN006)? How does this account for any relocation of existing businesses and conversion of the mill buildings?
- Q2. What is the current status regarding development proposals at St Monica's Convent, Gargrave? The latest Housing Trajectory states that planning permission was granted in 2013 and expired in 2016. Given the amount of time which has elapsed, what is the justification for including 70 dwellings within the first 5 years?
- Q3. What is the justification for including 105 dwellings coming forward within the first 5 years at North Parade, Skipton (site Ref SK114 and SK124)?
- Q4. How has the delivery of 145 dwellings been calculated on land north of the A692 and west of Carleton Road, Skipton (site Ref SK094)?
- Q5. What is the current status regarding the completion of Section 106 agreements at Malsis Hall, Glusburn and Hawkbank Fields, Skipton? How has this been factored into the calculation of the 5 year housing land supply position?
- Q6. Taking into account the site constraints, in particular the requirement to either increase the width of Horse Close Bridge or provide a new access

¹⁸ Document SD004

over the canal, what is the justification for including 74 dwellings coming forward within the first 5 years on land west at Sharphaw Avenue (site Ref SK061)?

- Q7. What is the justification for including 50 dwellings coming forward within the first 5 years on land south of Runley Bridge Farm (site Ref SG064), including 10 dwellings in 2018/19?

Issue 4 – Windfall Allowance

Paragraph 48 of the Framework states that local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the SHLAA, historic windfall delivery rates and expected future trends, and should not include residential gardens. Taking this into account:

- Q8. What allowance has been made for windfall sites coming forward over the first five years, and thereafter throughout the plan period?
- Q9. What is this based on and is it justified on appropriate available evidence?
- Q10. Having regard to the answers provided to the questions above, and questions regarding the OAN for housing under Matter 2, will there be a five-year supply of deliverable housing sites on adoption of the Local Plan?

Issue 5 – Future Supply

Paragraph 47 of the Framework states that local planning authorities should also identify a supply of specific, developable sites or broad locations for growth for years 6-10, and, where possible, years 11-15.

- Q1. How has the Council arrived at the figures in the Housing Trajectory for years 6-10 and 11-15?
- Q2. What factors were taken into account in arriving at the figures in the Housing Trajectory? Are they justified and based on appropriate available evidence?
- Q3. Is there likely to be a sufficient supply of housing land throughout the lifetime of the Plan?

Issue 6 – Flexibility

- Q1. What flexibility does the plan provide in the event that some of the larger sites do not come forward in the timescales envisaged?
- Q2. Is it necessary to have a review mechanism in the Plan to consider progress against these, and other sites, and to identify any appropriate steps to increase supply if required?

Matter 7 - Affordable Housing Provision (Policy H2)

Issue 1 – Addressing Affordable Housing Need

- Q1. What is the justification for having a different policy requirement for affordable housing on greenfield and brownfield sites?
- Q2. Is it appropriate to require decision-makers and developers to negotiate the level of affordable housing on a case-by-case basis for brownfield sites?
- Q3. What is the justification for requiring development proposals to demonstrate 'exceptional circumstances' where a lower level of affordable housing is proposed?
- Q4. Under what circumstances might the Council apply vacant building credit and "*reduce on-site and/or financial contributions accordingly*"? Is the approach consistent with advice contained in the National Planning Practice Guidance?
- Q5. Which settlement does Policy H2 III) apply to? Is it clear to decision-makers, developers and local communities?
- Q6. Is it clear under what circumstances off-site contributions will be acceptable in lieu of on-site provision? How will a decision-maker determine whether or not an off-site contribution is "*preferable in terms of achieving housing and planning objectives*"?
- Q7. Is Policy H2 consistent with national planning policy concerning the thresholds for affordable housing?

Issue 2 – Rural Exception Sites

- Q1. How will local needs be determined for the purposes of Policy H2 f) I)? Does the 'local area' relate to the settlement in which the development is located, the District or Parish level?
- Q2. What is the justification for allowing rural exception sites to come forward in locations other than Skipton?
- Q3. How would a proposal for affordable housing be considered in or adjoining a Tier 5 settlement not defined under Policy SP4?
- Q4. What is the justification for requiring rural exception sites to be 'small'? How will this be defined? Is the policy effective?
- Q5. What is the justification for requiring rural exception sites with an element of market housing to demonstrate "*very special circumstances*"? Is this consistent with national planning policy and guidance?

Matter 8 – Housing Mix and Density (Policy SP3)

Issue 1 – Housing Mix

- Q1. What is the justification for Policy SP3 a) which sets out a specific mix of house types that will be required as part of proposals for new residential development?
- Q2. Is it appropriate to apply the same mix of house types across the plan area? For example, how would a decision-maker ensure that proposals for new development made an efficient use of land and promoted or reinforced local distinctiveness, especially in highly accessible urban locations?
- Q3. Does Policy SP3 apply to all housing, including proposals for affordable housing?
- Q4. Does the Local Plan include sufficient flexibility to allow for changing circumstances in the mix of new housing required?

Issue 2 – Housing Density

- Q1. What is the justification for Policy SP3 b) which sets out a standard density of 32dph across the plan area and across all tenures?
- Q2. Is it appropriate to set out a density target for the whole plan area given the differences between towns such as Skipton and Settle and more rural areas?
- Q3. How does Policy SP3 ensure that development will optimise the use of land, especially in urban locations that are well served by public transport?
- Q4. Is it clear to decision-makers, developers and local communities what density of development will be required and where? Is the policy effective?

Matter 9 - Specialist Housing for Older People (Policy H1)

Issue 1 – Housing for Older People

- Q1. Paragraph 6.2 of the Local Plan states that the number of people across Craven District aged 65 or over is projected to increase from 14,000 in 2015 to 21,200 by 2037. What provision does the Local Plan include to ensure that this need is met?
- Q2. By reference to the SHMA, paragraph 6.4 of the Local Plan also refers to research which suggests that the majority of older people (generally upwards of 65%) want to stay in their own homes. How has this been factored into account in establishing the overall housing needs for Craven?
- Q3. How will 'sustainable locations' be determined for the purposes of Policy H1? Is this clear to decision-makers, developers and local communities? Is the policy effective?
- Q4. Is it clear what is expected of developers under Policy H1 b)? Is the policy effective in this regard?
- Q5. What is the justification for Policy H1 b) and where is this set out in the evidence base? Is the requirement consistent with advice contained in the PPG?

Matter 10 – Gypsies, Travellers, Showmen and Roma (Policy H3)

Issue 1 – Need for Accommodation

- Q1. The *Craven District Council Traveller Housing Needs Survey*¹⁹ is dated January 2013, with the information and surveys underpinning the findings from 2012. Is the identified need for residential pitches over the plan period justified by appropriate, available and up-to-date evidence?
- Q2. Since publication of the Traveller Housing Needs Survey the National Planning Policy for Traveller Sites (PPTS) has updated the definition of 'gypsies and travellers' and 'travelling showpeople'. Previously included within the definition were those who had ceased to travel temporarily or permanently for reasons of health, education or old age. How has this change been taken into account as part of the assessment of needs?
- Q3. How have other changes in circumstances been reflected since the initial assessment was carried out? Are the findings of the 2013 study still accurate and robust?
- Q4. The *Gypsy and Traveller Analysis 2017*²⁰ paper states that caravans on unauthorised developments has been on the increase since 2010, and that since 2011 caravan demand has exceeded pitch supply. Taking this into account, what is the justification for the conclusion that no demand currently exists for additional pitch provision?
- Q5. The *Craven District Council Traveller Housing Needs Survey* refers to Gargrave as a stopping point for gypsies and travellers en-route to the Appleby fair. With this in mind how has the need for transit provision been taken into account, and how is it reflected in the Local Plan?
- Q6. In order to meet the housing requirements of Gypsies, Travellers, Showmen and Roma Policy H3 states that the Council will maintain an adequate supply of existing sites. How will this be achieved? Are the existing sites identified in the Local Plan and/or the Policies Map?

Issue 2 – Proposals for Gypsies, Travellers, Showmen and Roma Accommodation

- Q1. How will the compatibility of land uses be considered for the purposes of Policy H3 g)? Is this clear to decision-makers, developers and local communities? Is the policy effective?
- Q2. How does Policy H3 take into account the effect of a proposal on the character and appearance of the area?
- Q3. Is it clear to decision-makers, developers and local communities what "any potential impacts on the environment" relates to? Is the policy effective?

¹⁹ Document Ho016

²⁰ Document Ho003

Matter 11 – Transport (Suggested Policy INF7, Policy INF4 and ENV12)

Issue 1 – Transport – Suggested Draft Policy INF7

- Q1. How has the Council:
- Identified the transport demands arising from the policies, allocations and growth aspirations of the Local Plan;
 - Assessed the impacts of policies, allocations and growth aspirations on the performance of the transport network;
 - Identified any outcomes or mitigation as necessary;
 - Assessed the adequacy of any identified outcomes or mitigation; and
 - Identified any phasing and/or funding requirements necessary to ensure that the identified infrastructure measures are viable and deliverable?
- Q2. In response to the Inspector’s Initial Questions²¹ the Council advised that further modelling work was being undertaken and *"would allow CDC and NYCC to produce a Statement of Common Ground on this matter..."* Has the further modelling work now been completed? What does it demonstrate? Does it consider the traffic impacts of additional development on all of the settlements identified for growth?
- Q3. The Council’s response to the Inspector’s Initial Questions also confirmed that it has commission *"some high level traffic modelling for Bentham and Settle..."* What are the reasons for this, and what does the further modelling show? What effect will the allocations and policies in the Plan have on the highway network in and around Bentham and Settle? If mitigation is necessary, how will this be delivered?
- Q4. Is the Plan consistent with paragraph 34 of the Framework which states that plans should ensure that developments which generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised?
- Q5. How do the policies and allocations in the Plan meet the requirements of paragraph 35 of the Framework, having particular regard to prioritising pedestrian and cycle movements, creating safe and secure layouts, incorporating facilities for ultra-low emission vehicles and considering the needs of people with disabilities?
- Q6. What is the justification for suggested **Draft Policy INF7**? Why is it necessary in the interests of soundness?
- Q7. What is the justification in draft Policy INF7 for seeking tariff style contributions for highway improvement works to mitigate the cumulative impact of proposed growth around Skipton? Is the policy consistent with paragraphs 203 and 204 of the Framework relating to planning obligations?

²¹ Document EL1.001c

Issue 2 – Parking Standards – Policy INF4

- Q1. What are the minimum parking standards referred to in Policy INF4?
- Q2. The Written Ministerial Statement ('WMS') of March 2015 states that local planning authorities should only impose local parking standards for residential and non-residential development where there is clear and compelling justification that it is necessary to manage their local road network. Which evidence base documents set out the justification for minimum parking standards in Policy INF4?
- Q3. Is it clear to decision-makers, developers and local communities what the parking policies and objectives of Craven District Council and NYCC are for the purposes of Policy INF4 d)? Is the policy effective?
- Q4. How will the Council encourage the use of electric vehicle charging points under Policy INF4 e)? Is the policy effective in this regard?

Issue 3 – Footpaths, Bridleways, Byways and Cycle Routes – Policy ENV12

- Q1. To be effective is it also necessary to refer to the towpaths associated with the Leeds & Liverpool Canal in Policy ENV12?

Matter 12 – Infrastructure Provision (Policies SP12, INF1, INF5 and INF6)

Issue 1 - Infrastructure – Policies SP12, INF1 and INF5

- Q1. What is the justification for including the Infrastructure Delivery Plan ('IDP') within the Appendices to the Local Plan? Would this render the Plan out-of-date should the IDP be updated?
- Q2. What does the phrase "*Associated decisions should be taken based upon an assessment of the contribution to social, economic and environmental sustainability and effect upon implementation of the strategy, not solely cost*" within Policy SP12 mean? Is it clear to decision-makers, developers and local communities what is required of proposals for new development? Is the policy effective?
- Q3. Paragraph 8.4 of the Local Plan states that a consideration of cost has been built into policy requirements for infrastructure and mitigation measures. Where is this set out, and what does it demonstrate?
- Q4. Paragraph 8.2 of the Local Plan states that the Council will consider the introduction of a Community Infrastructure Levy ('CIL') charging schedule. How does this relate to evidence in the *Local Plan Viability Assessment* and *Local Plan Viability Assessment Addendum Report*²²?
- Q5. In order to be sound is it necessary to include references to specific types of infrastructure provision in Policy INF1, such as schools?
- Q6. Are Policies SP12 and INF1 consistent with paragraph 204 of the Framework which states that planning obligations should only be sought where they are necessary to make the development acceptable in planning terms, are directly related to the development and are fairly and reasonably related in scale and kind to the development?
- Q7. What is the definition of sensitive areas for the purposes of Policy INF5? As submitted is this clear to decision-makers, developers and local communities?
- Q8. Will it be possible for all new development to contribute towards, and be compatible with, next generation broadband, even in rural areas?

Issue 2 – Education Provision – Policy INF6

- Q1. What is the justification for the thresholds in Policy INF6? What are they based on and how have they been determined?
- Q2. How does the Local Plan ensure that contributions made by developers are sufficient to deliver the additional school places required to meet the increase in demand generated by new developments, where necessary? Is Policy INF6 effective?
- Q3. Is it clear to decision-makers, developers and local communities what funding mechanisms will be used to provide additional school places?
- Q4. How will a decision-maker determine whether or not a one-bedroom dwelling is "*clearly incapable of being enlarged*"? Is the policy effective?

²² Document Ec005

Matter 13 – Community Facilities (Policies INF2 and INF3)

Issue 1 – Community Facilities and Social Spaces – Policy INF2

- Q1. Would a proposal involving the loss of a community facility have to meet Policy INF2 e)-h) inclusive? As submitted is this clear to decision-makers, developers and local communities?
- Q2. How does Policy INF2 allow for the appropriate re-use of specialist community buildings which are no longer required for their original purpose, such as buildings used for healthcare?
- Q3. Is it clear what community facilities would be considered against Policy INF2?

Issue 2 – Sport, Open Space and Recreation – Policy INF3

- Q1. What criteria would a development proposal for a new sports facility be assessed against?
- Q2. Is it clear to decision-makers, developers and local communities whether a site is "*well located*" for the purposes of Policy INF3? Is the policy effective?
- Q3. What is the justification for requiring all new housing and mixed-use developments to provide or contribute towards open space and sports provision? Is this appropriate and viable for all types of housing, such as specialist housing for older people?
- Q4. How would the proposed redevelopment of an area of publically inaccessible amenity open space be considered under Policy INF3 d)?
- Q5. How were the Open Spaces, Civic Spaces and Sport and Recreation Facilities shown on the Policies Map determined? How were sites considered for inclusion?
- Q6. Was the site selection process robust? Was an appropriate selection of criteria taken into account?
- Q7. Are there any factors which indicate that a site(s) should not have been designated as an Open Space, Civic Space or Sport and Recreation Facility?
- Q8. The *Open Space, Sport and Recreation Facilities Assessment*²³ includes scores highlighted in yellow for certain sites, and some sites which have no scores. Is this the most up-to-date assessment of open spaces for the purposes of Policy INF3?
- Q9. What is the justification for designating land at Beech House, Thornton in Craven as open space?
- Q10. What is the justification for designating land at Giggleswick School as open space?

²³ Document In012

Matter 14 – Economic Development (Policies SP2, EC1 and EC2)

Issue 1 – Need for Employment Land – Policy SP2

- Q1. What is the estimated need for additional employment land over the plan period? What is it based on and is it robust?
- Q2. Are the land requirements set out in Policy SP2 gross or net figures? As submitted is this clear to decision-makers, developers and local communities?
- Q3. What are the reasons for the variation in the amount of employment land considered necessary from the March 2017 *Employment Land Review* to the November 2017 *Employment Land Review Addendum*?²⁴
- Q4. What is the justification for the expected decline in demand for Class B2 General Industrial land, but a growth in the need for Class B1a/b office floorspace?
- Q5. How has the evidence base considered qualitative, as well as quantitative needs for employment land?
- Q6. How does the provision of 32ha of employment land over the plan period relate to past completion? Is the provision of at least 32ha of land realistic?
- Q7. Does the Local Plan provide sufficient sites to meet the identified need for employment land over the plan period?
- Q8. What flexibility has been included to allow for changing economic circumstances, such as increased growth or the loss of existing employment land and buildings?

Issue 2 – Provision of Employment Land – Policies EC1 and SP5 to SP11

- Q1. Policy EC1 supports proposals for employment/economic development in existing employment areas, on land allocated for employment/mixed uses and "*in locations that accord with the Spatial Strategy*". Is it clear to decision-makers, developers and local communities under what circumstances proposals on windfall sites would be supported?
- Q2. Is it clear to decision-makers, developers and local communities what is meant by "*adverse amenity effects on sensitive uses*" for the purposes of Policy EC1 a)?
- Q3. What is the justification for requiring all proposals for economic development to be adequately served by communications infrastructure? Is this likely, even for small-scale proposals in rural settlements?
- Q4. How is the 'local area' defined for the purposes of Policy EC1 g)? Is it clear to decision-makers, developers and local communities? Is the policy effective?

²⁴ Documents EC002 and EC003

Issue 3 – Employment Land Allocations

Methodology

- Q1. How were different sites considered for inclusion as allocations? What process did the Council follow in deciding which sites to include in the Local Plan?
- Q2. How was the spatial distribution of employment allocations determined? How does it relate to the spatial strategy and settlement hierarchy?
- Q3. Was the site selection process robust? Was an appropriate selection of potential sites assessed, and were appropriate criteria taken into account?
- Q4. Are there any factors which indicate that a site(s) should not have been allocated for development?
- Q5. Is there any risk that site conditions and constraints might prevent development or adversely affect viability and delivery? Are all sites viable and deliverable?
- Q6. How has the effect of allocations on the local and strategic road network been assessed? Where specific mitigation has been identified as necessary is this set out in the relevant policies?
- Q7. How has the effect of allocations on the natural and built environment been taken into account, including biodiversity, geodiversity and heritage assets?
- Q8. Are the allocations justified, effective and consistent with national policy?

SK139 – Land east and west of Cavendish Street, Skipton

- Q9. Is it clear to decision-makers, developers and local communities what uses will be permitted on the site, including the amount of potential Class A1 uses? What 'commercial' uses does the Local Plan support?
- Q10. In allocating the site for retail purposes, how has the Council considered the availability and suitability of sequentially preferable sites in the town centre, and the impact of development proposals on the vitality and viability of the centre?
- Q11. Is the allocation consistent with paragraph 100 of the Framework, which states that Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property?
- Q12. What is the current use of the site? What effect will the proposed allocation have on the availability of car parking in the area?
- Q13. Taking into account that the site has multiple owners, and considering the identified development constraints, is it deliverable within the plan period?

SK140 – Land at Skipton Station Areas A and B

- Q14. Is it clear to decision-makers, developers and local communities what uses will be permitted on the site, including the amount of potential Class B1/B2/B8 uses?
- Q15. In identifying the site as suitable for main town centre uses under Policy EC5, how has the Council considered the availability and suitability of sequentially preferable sites in the town centre, and the impact of development proposals on the vitality and viability of the centre?
- Q16. What is the flood risk identified in Policy SP5? Is the site consistent with paragraph 100 of the Framework, which states that Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property?
- Q17. What is the justification for requiring the production of a masterplan for the site? Is it clear who will be responsible for producing the masterplan and/or what it should contain?

SK049 – Land east of Skipton bypass

- Q18. Is it clear to decision-makers, developers and local communities what uses will be permitted on the site, including the amount of potential Class B1/B2/B8 uses?
- Q19. How has access to the site been considered and assessed? Where will development proposals be expected to access the site from?
- Q20. What is the justification for requiring an assessment of ground conditions? What has the site previously been used for and is it likely to be subject to contamination?
- Q21. Is the allocation consistent with paragraph 100 of the Framework, which states that Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property?

SK113 – Land south of Skipton Auction Mart

- Q22. Is it clear to decision-makers, developers and local communities what uses will be permitted on the site, including the amount of potential Class B1/B2/B8 uses?
- Q23. What is the justification for restricting use of the site to proposals falling within Use Classes B1/B2/B8, and not for use by Craven College or Craven Cattle Marts?
- Q24. How has the effect of the proposal on the character and appearance of the area been considered, having particular regard to the type of uses permitted and proximity to the Skipton Conservation Area?
- Q25. What is the justification for requiring buildings to be set back at least 15m from the Leeds & Liverpool Canal?
- Q26. What are the fluvial and surface water hazards identified in the supporting text to Policy SP5? Is the allocation consistent with paragraph 100 of the Framework, which states that Local Plans should

apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property?

SK135 – Skipton Rock Quarry

- Q27. What is the justification for allocating the site for only B2/B8 uses?
- Q28. Is the allocation of the site for employment purposes consistent with the spatial strategy which seeks to support sustainable economic activity?
- Q29. What is the surface water hazard identified in the supporting text to Policy SP5? Is the allocation consistent with paragraph 100 of the Framework, which states that Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property?

SG060 – Northern part of Sowarth Industrial Estate

- Q30. Is it clear to decision-makers, developers and local communities what uses are permitted? In particular, how much Class B1/B2/B8 floorspace is the site expected to provide?
- Q31. In identifying the site as suitable for main town centre uses under Policy SP6, how has the Council considered the availability and suitability of sequentially preferable sites in the town centre, and the impact of development proposals on the vitality and viability of the centre?

SG064 – Land South of Runley Bridge Farm

- Q32. What is the current status regarding planning application Ref 62/2017/18064?
- Q33. Policy SP6 allocates the site for "employment led mixed use development", including an "element of residential". Is it clear to decision-makers, developers and local communities how many dwellings are allocated on the site?
- Q34. How does the Local Plan ensure that development of the site will come forward in a planned and coordinated manner?
- Q35. What is the justification for the location of the allocation? How does it accord with the Vision of the Plan which describes Settle as a well-connected hub for the Yorkshire Dales which has a concentration of shops, services, cultural facilities, creative businesses and industry?
- Q36. How has the site allocation process considered the impact of development and the mix of uses on the highway network?
- Q37. How has the site allocation process considered the impact of development and mix of uses on the character and appearance of the area, having particular regard to the Yorkshire Dales National Park?
- Q38. How has the site allocation process considered the impact of development and mix of uses on the River Ribble (Long Preston Deeps) SSSI?

IN022 and IN035 – Land adjacent to Southern edge of Industrial Estate, New Road

- Q39. Is it clear to decision-makers, developers and local communities what uses will be permitted on the site, including the amount of potential Class B1/B2/B8 uses?
- Q40. Is the allocation of the site for employment purposes consistent with the strategy for economic growth in Policy SP2 which seeks to support sustainable economic activity?
- Q41. How has the effect of additional employment development on the landscape character of the area been assessed? Is it clear what is expected of proposals for new development in this regard?
- Q42. What is the fluvial and/or surface water hazard identified in the supporting text to Policy SP9? Is the allocation consistent with paragraph 100 of the Framework, which states that Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property?

Issue 4 – Safeguarding Existing Employment Areas – Policy EC2

- Q1. Does Policy EC2 apply to all sites falling within 'B' use classes, or just those sites identified on the Policies Map?
- Q2. Does Policy EC2 c) apply in all cases? As submitted is this clear to decision-makers, developers and local communities?
- Q3. Is it clear to decision-makers, developers and local communities how applicants for planning permission should demonstrate that there is no reasonable prospect of a site being retained, reused or redeveloped for 'B' use classes?

Matter 15 – Rural Economy and Tourism (Policies EC3, EC4 and EC4a)

Issue 1 – Rural Economy – Policy EC3

- Q1. What is the justification for supporting proposals for the conversions of barns and other local vernacular buildings for residential and/or employment uses "*within sustainable rural locations*"? Is this consistent with paragraph 55 of the Framework regarding the reuse of buildings?
- Q2. How would sustainable rural locations be defined for the purposes of Policy EC3 e)? Is the policy effective?
- Q3. What is the justification for specifically protecting live/work units? Is it clear to decision-makers, developers and local communities under what circumstances the re-use of live/work units would be permitted?

Issue 2 – Tourism – Policy EC4

- Q1. Are the key locations for tourism development under Policy EC4 identified on the Policies Map? Is it clear to decision-makers, developers and local communities which areas Policy EC4 relates to?
- Q2. Is it clear to decision-makers, developers and local communities what uses are permitted at the key locations for tourism development?
- Q3. How were key locations for tourism development identified? What process did the Council follow in in deciding which sites to include in the Local Plan?
- Q4. Are there any factors which indicate that a key location for tourism should not have been identified in the plan? Are all of the locations justified and sound?
- Q5. What is the difference between the key locations for tourism development and land designated as a Tourism Development Commitment?
- Q6. What is the justification for identifying land to the west of Hellifield under Policy EC4, but not other commitments, including for alternative uses?
- Q7. What uses does the Local Plan permit on land at Hellifield? Is it clear to decision-makers, developers and local communities?
- Q8. How has the extent of the site area been defined? What is it based on and is it justified?
- Q9. What is the justification for including an area of Local Green Space wrapping round the existing commitment? What effect will this have on the deliverability of the site for tourism related uses?
- Q10. Representations submitted by Natural England refer to the need for further information to be submitted in respect of the Pan Beck Fen SSSI and River Ribble (Long Preston Deeps) SSSI. Is this still the case?
- Q11. How have the effects of tourism development on the Pan Beck Fen SSSI and the River Ribble (Long Preston Deeps) SSSI been assessed?

- Q12. How have the effects of tourism development on setting of the Yorkshire Dales National Park been considered?
- Q13. Is it clear to decision-makers, developers and local communities what proposals will be permitted on un-designated land surrounding the tourism commitment? How would a decision-maker determine whether or not a proposal for new development was "*sensible in scale*"?

Issue 3 – Tourism-led Development at Bolton Abbey – Policy EC4A

- Q1. What is the justification for identifying a Core Visitor Area at Bolton Abbey? What is it based on and how has it been defined?
- Q2. Is the mix of uses permitted under Policy EC4A restricted to the Core Visitor Area?
- Q3. What is the justification for permitting residential and commercial uses under Policy EC4A, which specifically relates to tourism-led development? How does this correspond with paragraph 4.45 of the Plan which states that "*Bolton Abbey is not to be allocated housing growth in the spatial strategy in view of the significance and sensitivity of heritage assets*"?
- Q4. Is it clear to decision-makers, developers and local communities what uses are permitted at the general locations illustrated on the Policies Map?
- Q5. What is the justification for identifying general locations for larger scale development?
- Q6. How were the locations for larger scale development considered? What factors were taken into account? Are they justified, effective and consistent with national planning policy?

Matter 16 – Landscape, Heritage and Design (Policies ENV1, ENV2 and ENV3)

Issue 1 – Landscape – Policy ENV1

- Q1. What is the "relevant Landscape Character Appraisal" for the purposes of Policy ENV1 a)? As submitted is this clear to decision-makers, developers and local communities?
- Q2. Is it clear to decision-makers, developers and local communities what the different landscape character areas are within the Borough?
- Q3. Is Policy ENV1 consistent with paragraph 113 of the Framework which states that local planning authorities should set criteria based policies against which proposals for any development on or affecting landscape areas will be judged, with protection commensurate to their status?
- Q4. Is the 2002 *Craven Landscape Appraisal*²⁵ the most up-to-date assessment of the local landscape?

Issue 2 – Heritage – Policy ENV2

- Q1. Is Policy ENV2 b) consistent with paragraphs 132-134 of the Framework having regard to the substantial harm to, or total loss of significance of a designated heritage asset?
- Q2. How does Policy ENV2 require proposals to consider development within the setting of a heritage asset?
- Q3. Is Policy ENV2 e) consistent with paragraph 135 of the Framework and the approach to non-designated heritage assets?

Issue 3 – Design – Policy ENV3

- Q1. What are sensitive uses for the purposes of Policy ENV3 f)? What is the justification for requiring impact assessments to demonstrate that there would be no detrimental impact on future residential amenity? Is it clear to decision-makers, developers and local communities what is required?
- Q2. Does the Local Plan make sufficient provision for inclusive design and accessible environments in accordance with paragraphs 57, 58, 61 and 69 of the Framework?
- Q3. Is Policy ENV3 consistent with paragraph 59 of the Framework which states that design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area?
- Q4. Is it clear to decision-makers, developers and local communities what is required of proposals for new development under Policy ENV3 i)?
- Q5. What is the justification for encouraging developers to build new homes to 'Lifetime Homes' standards? Is this consistent with national planning policy and guidance?

²⁵ Document La001

Matter 17 – Flood Risk, Water Quality and the Leeds & Liverpool Canal (Policies SD2, ENV6, ENV8 and ENV11)

Issue 1 – Flood Risk – Policies SD2 and ENV6

- Q1. Are policies SD2 and ENV6 consistent with paragraph 94 of the Framework which states that local planning authorities should adopt proactive strategies to mitigate and adapt to climate change, taking full account of flood risk?
- Q2. Does Policy ENV6 set out clear and effective criteria for proposals for new development to adhere to?
- Q3. Is it clear to decision-makers, developers and local communities what is required of proposals when managing surface water drainage? Is it necessary in the interests of soundness to refer to the NYCC SuDs Design Guidance?
- Q4. What is the justification for referring to specific standards within Appendix D to the Local Plan, rather than Policy ENV6?

Issue 2 – Water Quality - Policy ENV8

- Q1. Is it clear to decision-makers, developers and local communities what is required of proposals for new development under Policy ENV8 b)?
- Q2. How does the Local Plan allow for potential operational development that may be required to United Utilities assets located in the countryside?
- Q3. What are Source Protection Zones ('SPZ's') and are they shown on the Policies Map?

Issue 3 – The Leeds & Liverpool Canal - Policy ENV11

- Q1. Is it clear to decision-makers, developers and local communities how development will be expected to improve the "amenity" of the canal? Is this precise enough, and is the policy effective?

Matter 18 – Renewable and Low Carbon Energy (Policy ENV9)

Issue 1 – Meeting the Challenge of Climate Change – Policy SD2

- Q1. Does the Local Plan seek to identify potentially suitable areas for wind energy development? How have the effects of wind energy been considered in the preparation of the Plan?
- Q2. Is it clear to decision-makers, developers and local communities what constitutes a small scale wind turbine? In order to be effective should this be more clearly set out in Policy ENV9?

Issue 2 – Renewable and Low Carbon Energy – Policy ENV9

- Q1. What is a “well-conceived” project for the purposes of Policy ENV9(a)? Is this clear to decision-makers, developers and local communities? Is the policy effective in this regard?
- Q2. How has the threshold for small-scale wind turbines been defined? What is this based on and is it appropriate for Craven District?

Matter 19 – Biodiversity (Policy ENV4)

Issue 1 – Biodiversity – Policy ENV4

- Q1. Is Policy ENV4 consistent with paragraph 113 of the Framework which states that local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged?
- Q2. Does Policy ENV4 make distinctions between the hierarchy of international, national and locally designated so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks?
- Q3. Does the Local Plan include policies which plan for biodiversity at a landscape-scale, including across local authority boundaries as required by paragraph 117 of the Framework? Does the Plan identify and map components of ecological networks, including wildlife corridors and stepping stones that connect them?
- Q4. What is the justification for specifically identifying sites under Policy ENV4 to make net gains in biodiversity through the introduction of green infrastructure routes?
- Q5. Is it clear to decision-makers, developers and local communities how any habitat loss and/or mitigation will be determined to ensure that proposals for new development secure net gains in biodiversity?

Matter 20 – Land and Air Quality (Policy ENV7)

Issue 1 – Land and Air Quality – Policy ENV7

- Q1. Is Policy ENV7 consistent with paragraph 112 of the Framework which states that local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land, and, where significant development of agricultural land is demonstrated to be necessary, seek to use areas of poorer quality land in preference to that of a higher quality?
- Q2. Is Policy ENV7 consistent with paragraph 120 of the Framework which states that to prevent unacceptable risks from pollution and land instability, planning policies and decisions should ensure that new development is appropriate for its location?
- Q3. Is it clear to decision-makers, developers and local communities what is expected of proposals for new development under Policy ENV7 a) – c)?
- Q4. How has the preparation of the Plan, including the identification of sites for new development, taken into account cumulative air quality effects?

Matter 21 – Green Infrastructure, Local Green Space and Green Wedges (Policies ENV5, ENV10 and ENV13)

Issue 1 – Green Infrastructure – Policy ENV5

- Q1. What is the justification for listing sites under Policy ENV5 and specifying on the Policies Map the extent of green infrastructure required?
- Q2. Does this provide sufficient flexibility to allow allocated sites to come forward at the detailed design stage?
- Q3. How were sites considered for inclusion in Policy ENV5? What process did the Council follow?
- Q4. How were areas of green infrastructure decided? What factors were taken into account in establishing the areas illustrated on the Policies Map?
- Q5. In determining which sites to include in Policy ENV5 how was deliverability and viability considered, especially for sites where large areas of green infrastructure is required?
- Q6. Are the sites included in Policy ENV5 justified, effective and consistent with national planning policy?
- Q7. Policy SP6 (Site Ref SG064, Runley Bridge Farm) requires a comprehensive landscaping scheme to filter views of the development from the east and west. Taking this into account, why has no green infrastructure been identified for the site under Policy ENV5?
- Q8. What is the justification for the extent of green infrastructure proposed at Site Ref SG079 (land north of Town Head Way) under Policy SP6?

Issue 2 – Local Green Space - Policy ENV10

- Q1. How were areas of Local Green Space identified on the Policies Map and what process was followed? What evidence-based documents were used to inform this process?
- Q2. Are the Local Green Spaces consistent with paragraphs 76-77 of the Framework which state that such designations should only be used:
 - Where the green space is in reasonably close proximity to the community it serves;
 - Where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
 - Where the green area concerned is local in character and is not an extensive tract of land.

- Q3. What is the justification for designation EM-LGS11? How has the site area been defined and assessed in the *Local Green Space Assessment*²⁶?
- Q4. What is the justification for designation HE-LGS5? What evidence is there to indicate that the site is rich in wildlife?
- Q5. What is the justification for designation HE-LGS1? Does the site relate to an extensive tract of land for the purposes of the Framework?
- Q6. What is the justification for designation SG-LGS22? How has the site area been defined and assessed in the *Local Green Space Assessment*?
- Q7. What is the justification for designation CA-LGS6? How has the site area been defined and assessed in the *Local Green Space Assessment*?
- Q8. What is the justification for designation SK-LGS64? Does the site relate to an extensive tract of land for the purposes of the Framework?
- Q9. What is the justification for designation SK-LGS51 enclosing allocation Ref SK087 – land north of A6131 and south of A65?
- Q10. Is Policy ENV10 consistent with paragraph 78 of the Framework which states that local policy for managing development within a Local Green Space should be consistent with policy for Green Belts?

Issue 3 – Green Wedges – Policy ENV13

- Q1. What is the justification for Green Wedges between High and Low Bentham, between Glusburn, Crosshills, Sutton-in-Craven, Farnhill and Kildwick and up to the plan boundary near Eastburn?
- Q2. How were the Green Wedges identified on the Policies Map and what process was followed? What evidence-based documents were used to inform this process?
- Q3. Are the Green Wedges justified, effective and consistent with national policy? Are there any significant factors that indicate that areas of land should not have been designated?
- Q4. Policy ENV13 states that development will be resisted where it would compromise the gap between settlements. Is this clear to decision-makers, developers and local communities? Is it consistent with the aims and objectives of the policy which states that Green Wedges will help settlements grow in ways that maintain and reinforce individual character?

²⁶ Document Lo002

Matter 22 – Town, District and Local Centres (Policies EC5 and EC5A)

Issue 1 – Retail Hierarchy – Policy EC5

- Q1. What criteria have been used to determine the hierarchy of centres? Does this relate to their size and existing provision, or have other factors been taken into account?
- Q2. Does the Plan provide a clear definition of Primary and Secondary frontages in defined centres and set policies that make clear which uses will be permitted as required by paragraph 23 of the Framework?
- Q3. How has the Primary Shopping Area ('PSA') for Skipton been defined?
- Q4. Are the District Centres of Benthams and Crosshills, and the Local Centre of Ingleton defined on the Policies Map? If not, are Policies EC5 and EC5A effective?

Issue 2 – Identifying and Meeting Town Centre Needs – Policy EC5

- Q1. What are the capacity figures for convenience and comparison retailing in Policy EC5 based on? Are they net or gross figures? Are they justified and robust?
- Q2. Paragraph 23 of the Framework states that in drawing up Local Plans local planning authorities should "*allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. It is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability. Local planning authorities should therefore undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites.*" How does the Local Plan seek to ensure that the right amount of land is available in the right places to meet the needs for retail, leisure, office and other main town centre uses?
- Q3. Is it clear to decision-makers, developers and local communities what amount of retail (and other town centre uses) is permitted on allocated sites SK139, SK140 and SG060?
- Q4. What is the justification for requiring sequential and impact tests for new retail development on allocated sites SK139 and SK140? Is the Local Plan consistent with paragraph 24 of the Framework which states that local planning authorities should apply a sequential test to planning applications for main town centre uses that are not in accordance with an up-to-date Local Plan? Does the Local Plan require sequential and impact assessments on all sites allocated for uses including retail?

Issue 3 – Managing Centres – Policy EC5

- Q1. How does the Local Plan safeguard the retail function of the Skipton PSA, as set out in Policy EC5?
- Q2. Is it clear to decision-makers, developers and local communities what uses are permitted in the Skipton PSA, the Skipton Town Centre and other centres in the hierarchy? For example, what criteria would be used to assess proposed changes of use from Class A1 retail?

- Q3. Does the Local Plan require applications for main town centre uses that are not in an existing centre to apply a sequential test consistent with paragraph 24 of the Framework?
- Q4. What are the thresholds for impact assessment under Policy EC5 based on? Are they justified and will they be effective?
- Q5. Is it clear to decision-makers, developers and local communities what uses will be required to carry out impact assessments under Policy EC5? Is the policy consistent with paragraph 26 of the Framework which refers to applications for retail, leisure and office developments, and the evidence contained in the *Retail and Leisure Study with Health Checks*²⁷?
- Q6. Is it clear to decision-makers, developers and local communities what uses are permitted in the town and village centres of Bentham, Crosshills and Ingleton? Is Policy EC5 effective in this regard?
- Q7. How would a proposal for a main town centre use be considered in other settlements not falling within Level 1-4 under Policy EC5?

Issue 4 – Residential Uses in Town and Village Centres – Policy EC5A

- Q1. Are residential uses permitted at ground floor level within the Skipton PSA provided that development proposals do not result in the loss of retail units? How does Policy EC5A support the vitality and viability of the Skipton PSA?
- Q2. What is the justification for restricting residential development elsewhere within the Town Centres of Skipton and Settle where it would result in the loss of retail, commercial, leisure or community buildings?
- Q3. It is clear to decision-makers, developers and local communities what location(s) policy EC5A applies to in respect of Bentham, Crosshills and Bentham?

²⁷ Document Ec006