Yorkshire Dales Local Plan

Housing Land Availability Assessment (Regulation 22 version)

June 2025

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INTRODUCTION

a. A new Local Plan is being prepared for the Yorkshire Dales National Park. This will be the first time a single set of planning policies has been produced for the National Park, following its extension in August 2016.

b. The Local Plan will provide the planning policy framework for the National Park and will be the single most important consideration when planning decisions are made. To date, a number of consultations have taken place to help determine what issues the Local Plan needs to address and how it should address them[1].

c. One of the Local Plan's most important functions is to ensure that sufficient housing is provided in order to deliver its objectives, most notably the commitment to:

"Identify sites and permit development of new affordable housing that will meet the needs of local communities, the economy and the long-term objective of stabilising population decline and aging"

d. This commitment stems from evidence underpinning the Local Plan, together with previous consultations that have been undertaken. They identify a minimum housing target of 50 additional dwellings per year as being necessary to address the trends towards a shrinking population with significant contraction in younger age groups. Over the full Local Plan period (2025-40) this equates to an overall housing requirement of 750 dwellings.

Purpose of this report

e. If this housing target is to be delivered, there will need to be a sufficient supply of housing land made available for development.

f. The Housing Land Availability Assessment (HLAA) is an important part of the evidence base underpinning the Local Plan. Its purpose is to establish the sources of land supply that can contribute towards the Local Plan's housing target. This involves identifying sites with potential for development and ensuring that they are suitable, available and achievable.

g. The Local Plan will allocate the sites to be developed. The role of the HLAA is to provide the background evidence that informs the decisions. It explores a

[1] https://www.yorkshiredales.org.uk/park-authority/living-and-working/planning-policy/local-plan-2023-40/local-plan-process/

range of options for releasing housing land and provides the information needed so that the Local Plan can determine the best strategy for delivering sufficient housing.

h. Two previous 'interim' versions of the HLAA have been produced to inform *Consultation No. 6: Land for housing development* (March 2023) and *Consultation No. 7: Preferred sites for development* (September 2024). This version of the HLAA is substantially the same as the third version issued when the Local Plan reached the 'Regulation 19' ('Publication') stage[2]. Some selective amendments have been made to the report after the Regulation 19 stage to allow the most up-to-date figures on extant planning permissions to be factored into the calculations on land supply (pages 5-6). This version of the HLAA forms part of the overall evidence base for the Local Plan that is submitted to the Secretary of State at Regulation 22 ('Submission) stage.

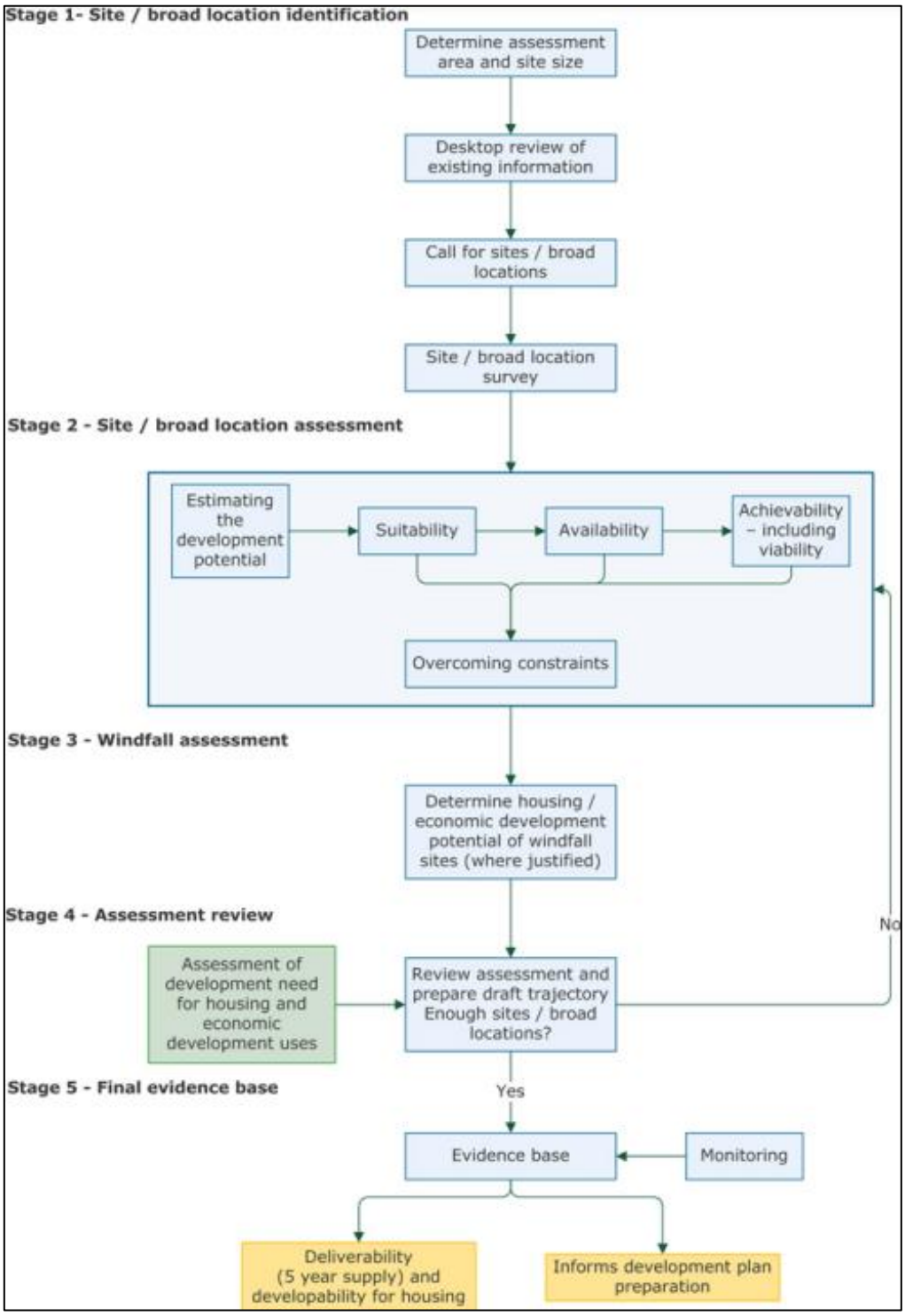
i. The Local Plan will now be the subject of a public examination by a Government-appointed Planning Inspector. If the Local Plan is found to be sound, it will be adopted and used to guide development decisions on matters such as planning applications.

Methodology

j. National Planning Practice Guidance (NPPG)[3] sets out in detail the methodology for producing housing land availability assessments. This consists of five stages as set out in Figure 1 overleaf.

[2] Yorkshire Dales Local Plan, Housing Land Availability Assessment (Regulation 19 version), February 2025
[3] National Planning Practice Guidance, **Housing and economic land availability assessment** **https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment**

Figure 1: Housing Land Availability Assessment methodology[4]



[4] NPPG Paragraph: 005 Reference ID: 3-005-20190722

Sources of housing land supply

k. There are three main sources of housing land supply:

Existing planning permissions – these are sites that have received planning permission and where those permissions remain extant or 'live', but development has not yet completed. These developments can be brought forward in accordance with the permission granted. Since planning permissions are existing commitments for housing supply, they contribute towards the overall supply of housing and are an important consideration in calculating future land requirements. The opening section of the report provides an overview of these permissions;

Local Plan sites (allocated sites) - these are specifically identified in the policies and on the maps that make up the Local Plan. An allocated site firmly establishes the principle of housing development, but planning permission is still required to agree the details around design, layout, house types and tenures. These are the sites that provide the focus for Stages 1 & 2 of the HLAA;

Unidentified windfall housing – sites that are not specifically identified but will still deliver new homes on an ad-hoc basis where the Local Plan policies allow this to happen. Windfall sites are typically small-scale and consist of new builds that infill or 'round off' settlements, together with the conversion of existing buildings to create new residential units (e.g. barn and chapel conversions, subdivision of existing houses, changes of use from commercial to residential etc.). Windfall housing is dealt with in Stage 3 of the HLAA.

l. National Planning Policy makes it clear that the planning system should be Plan-led. It is desirable for the Local Plan to provide as much certainty as possible about the land that will be developed over the next 15 years, so that there is corresponding certainty regarding the delivery of its objectives. A combination of existing planning permissions and newly allocated housing sites provide this certainty. Windfall housing is inherently less predictable and can only be relied upon if justified by evidence.

Existing planning permissions

m. At the point at which the new Local Plan is adopted there will be an extant supply of existing planning permissions. This is a context for the release of new housing sites, so it is important that the baseline situation is understood.

n. Existing planning permissions consist of sites where work has started (and remains extant indefinitely thereafter), and sites where work has yet to start, but is less than three years old so that the permission has not yet expired.

o. The National Park Authority has a live database of all planning permissions granted for additional residential units and undertakes monitoring of completions to determine the number of extant planning permissions at any given time.

p. As of June 2025, there is a gross extant supply of **410 additional residential units**[5] across the Local Plan area. This would represent 55% of the 750 dwellings the Local Plan intends to provide, however some adjustments are necessary to arrive at a more realistic figure, because:

- An allowance needs to be made to account for permissions that might expire because works do not commence within the requisite period (usually three years). Based on permissions granted since 2016, expiry rates in the National Park are low at around 4.5% of all residential permissions. Also, an allowance needs to be made for a small number of cases where, despite works starting, progress is so slow as to effectively render the permission undeliverable. In total this reduces the stock of permissions by 45 units.

- In addition, 139 of the extant planning permissions are barn conversions that have a flexible permission, either as a permanent residence (local occupancy), or short-stay holiday letting. Monitoring of historic completions reveals that 53% of these joint permissions have been occupied as permanent residences rather than holiday lets. On this basis a further 65 units are deducted from the assumed supply of planning permissions.

q. As a result of these adjustments, a realistic assumption of the current stock of planning permissions within the National park is **300 net additional residential units**. This is equivalent to 40% of the housing target of 750.

r. The total stock of existing permissions is subject to constant change depending on the number of new permissions granted and schemes completed each year. There has been a particular change in the stock of extant planning permissions since the last interim (Consultation No. 7) version of the HLAA was produced

[5] Excludes units permitted solely for holiday letting purposes and permissions for sites that are considered as potential site allocations in the following section of the report (to avoid double counting). Includes losses where permission granted for the demolition of, or change of use away from, a residential use.

in September 2024. This results from the completion of a large scheme of 49 dwellings in Sedbergh which has resulted in a significant reduction in the stock of remaining extant permissions. The relatively exceptional scale of this large development distorted the stock of extant planning permissions reported in previous versions of the HLAA. The figure of 300 is a more realistic estimate based largely on permissions for small windfall developments and is not expected to change significantly moving forward.

s. Whilst the HLAA is concerned about the overall supply of land for housing, the Local Plan objectives are more concerned about providing the right type of housing to meet the needs of local communities. It is therefore relevant to note some key characteristics of the current stock of planning permissions[6]:

- **Tenure** – only 3% of permissions can be described as affordable housing[7]. A further 37% have local occupancy or rural worker restrictions, with 34% offering the choice between either local occupancy or holiday letting. The remaining 26% are unrestricted open market dwellings.
- **Type** – only 27% are new build. 73% are changes of use of existing buildings (49% of these from barn conversion).
- **Location** – 40% are in the towns and larger villages that have some services[8]; 16% are in smaller villages and hamlets with few services; and 44% are in remote locations including farmsteads and open countryside away from services (predominantly barn conversions).
- **Size** – Housing permissions in the National Park are small-scale. The average number of residential units from each permission is just 1.2.

t. These limitations need to be borne in mind when determining the respective roles of existing planning permissions, future windfall developments (that are likely to be similar in profile to existing planning permissions) and newly permitted housing allocations, in meeting the National Park's housing needs.

[6] Percentages relate to the overall gross stock of 410 residential units.
[7] This excludes two sites in Long Preston and Horton in Ribblesdale that have extant planning permission for affordable housing but are included in the list of proposed site allocations, to avoid double counting. Significant reduction in this figure since the last version of the HLAA is due to the completion of 34 affordable permissions in 2024/25 on a site in Sedbergh.
[8] The top two tiers of the settlement hierarchy set out in the Local Plan preferred options document and shown in Figure 2 below.

1. STAGE 1: IDENTIFICATION OF SITE OPTIONS

1.1 Given that extant planning permissions are only likely to account for around 40% of the Local Plan's proposed housing target, it will be necessary to identify additional sources of land. Speculative future windfall housing is one option and is dealt with in Stage 3 of this report. A more planned approach is to release land through specific allocations in the Local Plan. This is the area of housing land supply that Stages 1 and 2 of the HLAA is most concerned with, since it is the means by which the majority of the housing land requirement will be met. It also allows a greater focus on larger sites of new build housing, requiring a thorough assessment to ensure the best available sites are identified.

Assessment area

1.2 In accordance with NPPG[9] the area selected for assessment is the Local Plan-making area, in this case the whole of the Yorkshire Dales National Park as extended in August 2016.

1.3 A key parameter used to determine the HLAA's search for sites was a resolution made by the National Park Authority in June 2021[10]. This determined that allocations should only be considered in the 'local service centres' and 'large villages' as shown in Figure 2. This means that the assessment can concentrate on those towns and larger villages with the best range of services, offering a choice for sites in over 60 settlements.

1.4 Within the lowest tier of settlements 'small villages', the National Park Authority has determined that only very small-scale housing may be permitted. This is considered in Stage 3 of the report dealing with windfall development.

[9] NPPG Paragraph: 006 Reference ID: 3-006-20190722
[10] https://www.yorkshiredales.org.uk/wp-content/uploads/sites/13/2021/06/Item-10-Developing-the-New-Local-Plan.pdf

Figure 2 – Local Plan settlement hierarchy

Sub-area	Local service centres	Large villages		
Ribblesdale & Chapel-le-Dale	*Ingleton*[11]	Austwick	Langcliffe	
	Settle/	*Clapham*	Long Preston	
	Giggleswick	Horton-in-Ribblesdale	Stainforth	
Wharfedale, Littondale, Langstrothdale & Malhamdale	Grassington/	Airton/Scosthrop	Cracoe	Kirkby Malham
	Threshfield	Appletreewick	*Eastby*	Linton
		Arncliffe	*Embsay*	Malham
		Bolton Abbey/Bolton Bridge	Hebden	Starbotton
		Buckden	Hetton	*Stirton/Thorlby*
		Burnsall	Kettlewell	
Swaledale & Arkengarthdale	Reeth	Fremington	*Hudswell*	
		Grinton	Langthwaite	
		Gunnerside	Low Row/Feetham	
			Muker	

[11] Settlements in italics are split by the National Park boundary

Wensleydale, Bishopdale & Coverdale	Hawes/Gayle	Askrigg	Carlton	Thoralby
		Aysgarth	Carperby	Thornton Rust
		Bainbridge	*East Witton*	West Burton
		Burtersett	Newbiggin (Bishopdale)	West Witton
Dentdale, Garsdale, Rawthey Valley & Lunesdale	Sedbergh	Barbon	Leck	
		Casterton	Millthrop	
		Dent		
Mallerstang, Upper Lunesdale & Westmorland Dales		Crosby Garrett	Maulds Meaburn	Orton
		Crosby Ravensworth	*Nateby*	Ravenstonedale/Coldbeck
		Great Asby	Newbiggin on Lune	

Site size

1.5 The next step in Stage 1 is to determine the size of site that the HLAA will consider as an option for allocation. There is discretion to set any size threshold, however NPPG suggests sites capable of delivering 5 or more dwellings may be most appropriate[12]. This helps to ensure that the HLAA retains a more strategic overview of future housing land availability and focusses attention on larger sites that offer the best potential of contributing more significantly to housing targets, while also offering the best prospect of securing on-site affordable provision.

1.6 No maximum site size threshold was set. National policies[13] require the 'scale and extent of development' within National Parks to be 'limited', and require exceptional justification for major developments, but there is no set threshold to determine this. Instead, the HLAA will help determine whether any particular site is likely to be inappropriate in scale.

1.7 The main focus of the HLAA is therefore on sites of 5 or more dwellings, but it does consider potential for smaller sites to come forward. This includes existing planning permissions, since these can be developed at any stage (see previous section). It also includes future small-scale windfall opportunities, such as new build infill, self-build, rounding off sites or the conversion of traditional buildings to residential uses (see Stage 3 – windfall).

Call for sites

1.8 The call for sites process helps ensure as many potential site opportunities as possible are identified. Most importantly, it allows landowners to engage in the process and suggest their land for development, providing more certainty that the sites will actually be made available for development.

1.9 The Authority issued a call for sites in early 2021. It invited suggestions from landowners, developers, planning agents, rural estates, housing authorities, parish councils, residents, local businesses and any other interested organisation or person. A copy of the Call for Sites documentation can be found in Appendix 1.

[12] NPPG, Paragraph: 009 Reference ID: 3-009-20190722
[13] National Planning Policy Framework, para 189 & 190

1.10 A total of 99 sites were submitted for consideration. Of these:

- 68 were located in local service centres or large villages, and were assessed as being capable of accepting 5 or more dwellings, so were taken forward to be considered as potential site allocations;
- 26 were located in local service centres or large villages but were either too small to be considered as allocations or were located in smaller villages where allocations would not fit with the Authority's minimum site size threshold and spatial strategy[14]. In these cases, sites were deferred for consideration as part of the assessment of windfall housing potential (see Stage 3 below)
- 5 were either too divorced from the main body of a settlement in the hierarchy; or located in a settlement that did not form part of the hierarchy; or were located in the open countryside. These sites were dismissed from consideration as they would not comply with the Local Plan's spatial strategy (Appendix 2).

1.11 The 68 sites taken forward for further consideration gave a notional combined dwelling yield of over 1,544 houses based on a standard density of 35 dwellings per hectare. Within this there were significant geographical disparities across the area:

- Craven District (42% of the National Park's resident population) accounted for nearly two thirds of the potential dwelling yield, so was significantly over-represented;
- South Lakeland & Lancaster (21% of the National Park's resident population) accounted for just under a quarter of the potential dwelling yield, so was slightly over-represented;
- Richmondshire (27% of the National Park's resident population) accounted for just 8% of the potential dwelling yield, so was significantly under-represented;
- Eden (10% of the National Park's resident population) accounted for just 2% of the potential dwelling yield, so was significantly under-represented.

Identifying additional sites

1.12 The geographical imbalances meant that a more proactive search for additional site candidates was required. Notwithstanding this, NPPG also encourages a desktop process to identify sites beyond those that plan-makers have been informed about.

[14] In accordance with the Authority resolution June 2021 https://www.yorkshiredales.org.uk/wp-content/uploads/sites/13/2021/06/Item-10-Developing-the-New-Local-Plan.pdf

1.13 A range of data sources were used to identify additional potential candidates, as set out in Figure 3. This process was able to identify a further 71 potential sites for consideration which equated to a further 1,600 units.

1.14 Since these potential sites were additional to the call for sites, there was far less certainty regarding their availability for development. Nonetheless, many had some sort of planning history so were not truly speculative. Owners of these sites were not engaged at this stage as further checks on their suitability for development were required.

Figure 3 – Sources reviewed to identify additional site candidates

Existing housing site allocations from adopted Local Plans	All housing sites allocated in the 2015 Local Plan that could accept 5 or more dwellings, had yet to be developed, and that had failed to be submitted through the call for sites, were included in the assessment. While the fact that these sites had failed to be developed since their original allocation in 2012 raises questions in terms of 'achievability', at this initial stage of the process the emphasis was upon identifying all reasonable site options that were 'suitable' and 'available', prior to testing whether they were 'achievable'.
Existing employment land allocations from adopted Local Plans	There were several sites allocated for employment development in the adopted Local Plan that had so far failed to be developed. Four of these were identified as having a sufficiently close relationship to a town or village in the settlement hierarchy, so that they could be considered in terms of their potential suitability for an element of housing development, in the event that this would help to bring development proposals forward: ASK4 - Land west of Askrigg Brewery, Askrigg HOR2 - Land west of Cragg Hill Road, Horton-in-Ribblesdale REE6 - Land north of Dales Centre, Reeth SED12 - Land south of Toll Bar Estate, Sedbergh A fifth site allocated for employment development in the adopted Local Plan had already been submitted through the call for sites (SED4, Former Baliol School, Sedbergh).

Sites with a planning history but no extant permission	A review was undertaken of sites with a planning history of residential development proposals. This included planning applications that had been refused or withdrawn where it was considered there was a reasonable opportunity of overcoming the issues identified. It also included pre-application enquiries that had not progressed to the planning application stage, together with sites considered as part of the last comprehensive site allocation process that preceded the adoption of the 2012 Housing Development Plan.
Publicly owned land	A review of the property asset registers of local authorities and other public bodies identified over 130 separate plots of publicly owned land, predominantly owned by constituent District and County Councils. This included schools, libraries, highway land, cemeteries, business units, car parks and public toilets. All the plots identified were either unsuitably located (outside of the settlement hierarchy) or otherwise in some form of beneficial use that would be displaced were housing to be considered.
Vacant and derelict land	The Authority's brownfield land register and older versions of the National Land Use Database were reviewed to identify any suitably located brownfield sites that could be considered for housing. The majority of these had already been identified through the review of existing planning permissions/site allocations or were otherwise unsuitably located for housing development.
Settlement edge opportunities	Over a number of years, the Authority has worked with Rural Housing Enablers to try and identify potential rural exception sites on the edge of settlements that might be brought forward to provide affordable housing. The site options considered as part of these processes were added into the HLAA process where some development potential had previously been identified. In addition, as part of a review of designated areas of important open space within or on the edge of settlements, consideration was given to whether some of the larger plots remained worthy of protection or otherwise whether they might have some development potential.

Combined list of potential sites

1.15 The call for sites process, together with additional sites considered in Figure 3, produced a combined total of 139 sites for further consideration. The potential dwelling yield was around 3,700 units based on a standard density of 35 dwellings per hectare. Appendix 3 contains a full list of the sites. The mapped extents of these sites are contained within the Landscape Sensitivity Assessments (LSA) published as part of the Local Plan's evidence base[15]. The role of the LSA is explained in Stage 2 of the process.

1.16 Each site was given a unique reference comprising three letters denoting the settlement and a number.

1.17 The wider search for sites reduced the initial geographical disparities from the Call for Sites but they still remained to some degree:

- Craven District (42% of the National Park's resident population) accounted for 60% of the potential dwelling yield, so remained over-represented;
- South Lakeland & Lancaster (21% of the National Park's resident population) accounted for 22% of the potential dwelling yield, so was proportionately represented;
- Richmondshire (27% of the National Park's resident population) accounted for 14% of the potential dwelling yield, so remained under-represented;
- Eden (10% of the National Park's resident population) accounted for 4% of the potential dwelling yield, so still remained under-represented.

1.18 It was not possible to identify a site in every town and village in the settlement hierarchy, but at least one option was identified in 49 of the 63 settlements. Unfortunately, the nature of some villages is that they are very constrained, so just could not offer potential for a site reasonably capable of accepting 5 or more houses. These settlements will however continue to offer some windfall potential (Stage 3).

[15] Sheils Flynn (2022) Search for potential housing sites: landscape sensitivity assessment

2. STAGE 2 – SITE ASSESSMENT

2.1 Stage 2 of the HLAA is concerned with sifting the sites identified in Stage 1 so that those with the best development potential can be identified. This includes establishing whether sites meet the three key requirements of national policy, which are summarised in Figure 4.

Figure 4: National tests of development potential

Suitable	In a location that is able to support new development, having potential for development without harming the character and appearance of the surrounding area, the amenity of neighbouring properties, wildlife or the historical environment, as well as being free from other constraints that would preclude development, such as flood risk or contamination.
Available	The landowner is willing to release the land for development, there is genuine intent to develop the site and there aren't any restrictive covenants, or land in third party ownership that would prejudice the site's release.
Achievable	The landowner has a realistic expectation of the commercial return possible either for the sale of the land or the completed development, taking account of site constraints and likely requirements for affordable housing provision, infrastructure and any other policy requirements, such as biodiversity net gain.

2.2 This involves a number of stages of sifting the sites as set out below.

STAGE 2A – INITIAL SHORTLISITING

Landscape sensitivity assessment

2.3 Impact on landscape character is an overarching constraint on the allocation of housing sites within a nationally designated protected landscape. A Landscape Sensitivity Assessment (LSA) was therefore commissioned to provide a consistent professional judgement on the likely landscape impact of the different options. The LSA builds upon a broader assessment – The Yorkshire Dales Landscape Character Assessment – that was completed in 2019[16].

2.4 The LSA reflects a range of characteristics that go to the heart of the National Park's special qualities. These characteristics were incorporated into the sensitivity assessments and consisted of:

- Physical and natural character;
- Settlement form and setting;
- Views and recreational experience;
- Perceptual qualities (scenic value, rural character, sense of remoteness & tranquillity);
- Cultural and historical associations.

Methodology

2.5 The LSA consists of three volumes that are published as part of the Local Plan's evidence base. These set out the full methodology used[17]. Each site was given a sensitivity rating against the five criteria listed above, followed by a single overall sensitivity rating as set out in Figure 5 overleaf.

2.6 Sites rated in the highest two sensitivity categories (High and Moderate-high) were deemed to conflict with National Park purposes and so unsuitable for development. Some sites were effectively given a dual sensitivity rating, which reflected the fact that developing a smaller site area, or responding to particular site characteristics, was capable of lowering the sensitivity rating. These cases are denoted with an asterisk.

[16] Sheils Flynn (2019) Yorkshire Dales Landscape Assessment
[17] Sheils Flynn (2022) Search for potential housing sites: landscape sensitivity assessment https://www.yorkshiredales.org.uk/park-authority/living-and-working/planning-policy/local-plan-2023-40/consultation-no-6-land-for-housing-development/

Figure 5: Landscape sensitivity rating bands

Sensitivity	Definition
High	Residential development would be very likely to give rise to significant adverse landscape and/or visual effects.
Moderate-high	Residential development would be very likely to give rise to adverse landscape and/or visual effects, and there is some potential for these to be significant.
Moderate	Residential development would be likely to give rise to some adverse landscape and/or visual effects, but these may be limited in extent.
Low-Moderate	Residential development may give rise to some minor adverse landscape and/or visual effects, but these would be unlikely to be significant.
Low	Residential development would be very unlikely to give rise to significant adverse landscape and/or visual effects.

2.7 Following on from individual site assessments, a further report sought to explore landscape issues at a whole settlement level, in those towns and villages where a number of sites were being considered. Its objective was to provide a balanced judgement of the opportunities and constraints for development in each of the 18 settlements assessed[18]. These settlement-level reports are also published as part of the Local Plan's evidence base.

2.8 The outcome of this work was that, from the 139 sites originally identified:

- 39 were rated as high or moderate-high sensitivity, so were considered to be generally unsuitable for development and screened out of the process at this stage;
- 34 were rated as moderate-high sensitivity, but were identified as having potential to lower their sensitivity rating if a reduced site area was considered (attributed an asterisk);
- 66 sites were rated as moderate sensitivity or lower, meaning that they could be considered in more detail.

A summary of the LSA ratings recorded for each site is contained in Appendix 4.

[18] Sheils Flynn (2022) Landscape sensitivity study - settlement analysis https://www.yorkshiredales.org.uk/park-authority/living-and-working/planning-policy/local-plan-2023-40/consultation-no-6-land-for-housing-development/

2.9 Where sites were considered to require a reduction in size to reduce landscape sensitivity, their site area was adjusted. In three cases, this resulted in a significant enough reduction to mean that they dropped below the minimum 5 dwelling threshold for potential allocations. Instead, these sites were considered as smaller-scale infill or rounding off plots (see Stage 3).

2.10 In total, 98 sites were found to have a low enough level of landscape sensitivity to warrant further consideration. These had a notional combined dwelling yield of 1,544 houses based on a standard density of 35 dwellings per hectare. The result was a geographical distribution broadly in line with that highlighted prior to the landscape assessment:

- Craven District (42% of the National Park's resident population) accounted for 60% of the potential dwelling yield, so remained over-represented;
- South Lakeland & Lancaster (21% of the National Park's resident population) accounted for 19% of the potential dwelling yield, so was slightly under-represented;
- Richmondshire (27% of the National Park's resident population) accounted for 15% of the potential dwelling yield, so remained under-represented;
- Eden (10% of the National Park's resident population) accounted for 4% of the potential dwelling yield, so remained under-represented.

Constraints checking

2.11 The next step was to sieve the remaining 98 sites through further constraints in order to arrive at a final shortlist for more detailed investigation. The constraints checking consisted of a number of factors set out in Figure 6 overleaf.

Figure 6: Constraints checking

Constraint	Overview
Flood risk	The Authority commissioned JBA Consultants to produce a Level 1 Strategic Flood Risk Assessment. This is a standard evidence requirement for Local Plans and seeks to provide an overview of flood risk using the best available data. The SFRA is concerned with all sources of flood risk, including from rivers, surface water, ground water and reservoirs. All sites were subjected to screening based on the modelled risk data which flagged the proportions of the site that lay within/outside any given flood zone. National planning policy requires development to be located, wherever possible, in the areas at lowest risk of flooding. Flood risk therefore represents a fundamental constraint to development and is only capable of being overcome following the application of sequential and exceptions testing.
Highways	Cumbria and North Yorkshire County Councils[19] were consulted and provided initial comments regarding the likelihood of a site being found to be acceptable in terms of highway capacity and safe access, together with other selected issues within their remits, for example public transport availability and flood risk issues (in their capacities as the Lead Local Flood Risk Authorities).
Wildlife	YDNPA's wildlife conservation team reviewed all of the sites and highlighted any potential issues in relation to important species and habitats;
Historic environment	YDNPA's historic environment team reviewed all of the sites and highlighted any potential issues in relation to archaeological remains/potential and building conservation issues, such as impact upon the setting of listed buildings and conservation areas;
Utilities	Selected utilities information was reviewed to assess whether development of a site may impact upon any infrastructure already present in or near to the site;
Development Management	YDNPA's development management officers reviewed all of the sites, together with the above constraints information, and provided comments on overall suitability, including any supplementary issues that might affect the site's suitability for development, for example impact on residential amenity, together with any relevant planning application history.

[19] These Councils have subsequently been replaced by Westmorland & Furness and North Yorkshire Councils as part of local government reforms implemented in 2023.

Site assessment

2.12 The constraints checking process provided a clearer picture of the sites' likely suitability for development. It allowed an initial recommendation to be made regarding whether a site should be investigated further, or whether it should be dismissed at this stage.

2.13 As was the case following the landscape sensitivity assessment, some of the identified constraints dictated further reductions in sites areas or otherwise indicated that a standard density of development may not be achievable. Where sites fell below the minimum threshold of 5 units they were considered as smaller scale infill/rounding off plots via the review of housing development boundaries and removed from the allocations process (see Stage 3 below).

2.14 Inevitably, given the nature of a protected area like the National Park with its many valued characteristics, cumulative constraints present barriers to development, some of which were preclusive. Unsurprisingly therefore, constraints checking resulted in a significant proportion of sites being dismissed at this stage of the process.

2.15 Of the 98 sites:

- 41 were considered worthy of further investigation – these sites had a potential dwelling yield of 774 houses;
- 14 were considered to have limitations on capacity that made them too marginal to consider as potential site allocations i.e. 5 or more dwellings seemed unlikely to be possible, meaning they were more appropriately considered as small-scale windfall developments through the review of development boundaries. These are dealt with in Stage 3 of the report;
- 39 were considered unlikely to be suitable for development, with a recommendation that they be dismissed from further consideration. These sites might still be brought forward for development as rural exception sites, dependent on the nature of the constraints that have resulted in their rejection as site allocation candidates (see Stage 3);
- 4 involved employment sites, including 3 that were allocated for employment development in the adopted Local Plan, where a judgement on any potential housing development was deferred until a fuller picture of housing land availability had emerged (see below).

Employment sites

2.16 Four of the sites considered for their housing potential at this stage raised particular issues in relation to the displacement of valued employment-generating business land/premises. These sites are set out in Figure 7 below. Two of these sites are previously developed land having a former employment use that has now been lost or significantly reduced (Baliol School and Carrs Billington). Both sites were included in the Preferred Options consultation

(Consultation No. 5) as potential employment site allocations in the emerging Local Plan. The other two are greenfield sites that have been allocated for employment development in the current and previous Yorkshire Dales Local Plans but have so far failed to be brought forward for development.

2.17 Evidence underpinning the Local Plan[20] emphasises how housing growth can help maintain and rebalance the National Park's population, but population and employment are intrinsically linked. Both are needed in the National Park to support communities that are sustainable, so any loss of larger employment sites needs careful consideration as part of a balanced approach. The fact that these sites have so far failed to be developed for employment purposes does not mean that they should inevitably be given over to alternative residential uses, especially at a time of structural change in systems and resources available to local government and devolved mayoral authorities. Furthermore, new housing that results in growth of the working-age population can drive future demand for suitable employment premises.

2.18 Aside from the imperative to deliver some employment-generating opportunity sites through the Local Plan process, a factor in whether to provide any residential uses on these sites also depends on the availability of alternative housing development sites and whether these would be sufficient to provide for a planned supply of land to meet the Local Plan target of 750 dwellings. This issue is discussed further below.

2.19 Initial landscape sensitivity and constraints checking suggested that these sites may have some potential to accept some residential development, however they were not included in the list of potential housing sites at this stage due to the need to more fully consider the issues surrounding the loss of employment land and the potential for the housing target to be met from other sites.

2.20 The HLAA did not make any recommendation on these sites following the conclusion of this initial stage of site assessment in March 2023. Consideration of them was deferred until a fuller picture of overall housing land availability had emerged, so that a more informed determination could be made (see stage 2B below for further consideration, para 2.49 onwards).

[20] Edge Economics (2019) Yorkshire Dales National Park Authority - Socioeconomic Wellbeing Assessment, p.4.

Figure 7: Employment sites

Site ref	Site address	Area (ha)	Description
SED4	Land at former Baliol School, Cautley Road, Sedbergh	1.6728	A range of former school buildings and grounds that have been vacant for a number of years. The site is allocated for employment development in the adopted Local Plan with a range of potential uses listed as appropriate. It was the subject of a planning application for a mixed business/residential development, premised on evidence that a purely business-led development, in line with the current Local Plan site allocation, was not viable. The planning application was refused in June 2023. Any allocation of the site for an element of housing development could attract Vacant Building Credit and potentially negate contributions to affordable housing and therefore impact on delivery of the Local Plan's housing objectives.
ASK2	Land at the former Carrs Billington Site, Askrigg	0.4105	This site embraces a range of large modern sheds formerly used for animal feed manufacture/processing from around 1980. It ceased to be actively used around 2015 and a 2017 scheme to subdivide the buildings into smaller units for letting to local businesses was never pursued. Since 2019 the site has been used largely for storage and occasional events. Any allocation of the site for an element of housing development could attract Vacant Building Credit and potentially negate contributions to affordable housing.
HOR2	Land west of Cragg Hill Road, Horton-in-Ribblesdale	0.4776	This land has been allocated for employment purposes since the first National Park Local Plan was adopted in 1996. It was envisaged as an extension to the development of small workshop units to the north but has never been pursued.
REE6	Land north of Dales Centre, Reeth	0.3257	This land has been allocated for employment purposes since the 2006 Local Plan. It was envisaged as an extension to the development of business units to the south. A planning application was approved in July 2023 to develop a hair salon and therapy premises on the western part of the site.

Availability of speculative sites

2.21 Of the 41 sites that were considered worthy of further investigation, 23 were ones that had been identified speculatively, as part of the broader search for sites (see above, Stage 1 – identifying additional sites), rather than from the call for sites. This meant that the Authority needed to make contact with the landowners concerned to establish their willingness to release their land for development.

2.22 Landowners of 15 of these sites confirmed that they were willing to consider development of their land and so these sites remain under consideration. Owners of the remaining 8 either declined to have their land considered or failed to respond, meaning availability of the land for development could not be confirmed, so those sites were dismissed from further consideration. As a result, the total of 41 sites that were considered worthy of further investigation was reduced to 33.

Dismissed sites

2.23 A combination of issues raised during the site assessment process mean that, out of the 98 that were left following the LSA process, a total of 65 sites were not recommended to be taken forward as potential site allocations following the conclusion of Stage 2A. This includes those where one or more of the following applied:

- sites unlikely to be suitable for development due to constraints;
- sites where constraints reduced likely capacity to below 5 units – these sites were considered through the review of development boundaries instead (Stage 3)
- sites where landowner willingness to release the land for development was either refused or could not be verified;
- sites that are the subject of special considerations in relation to the displacement of employment potential.

Sites falling into the first three categories made up the majority of dismissed sites and are listed in Appendix 5, together with a brief analysis of the reasons why they were not deemed suitable to be Local Plan site allocations. The final category – employment sites – are dealt with in paragraphs 2.16-2.20 above.

Shortlist of sites for potential allocation

2.24 A total of 33 sites remained as candidates for allocation following the initial screening stages. These are summarised in Figure 8 overleaf. They had a combined potential yield of 600 dwellings.

Figure 8: Initial shortlist of potential housing development sites, March 2023 (Consultation No. 6)

Site reference	Settlement	Site address	Site area (hectares)	Indicative capacity
AIR1	Airton	Land at Hallgarth, Airton	0.1630	5
AUS1	Austwick	Land at Pant Lane, Austwick	0.2433	8
BAR1	Barbon	Land west of Studds Hall, Barbon	0.1879	6
BAR2	Barbon	Land west of Moorthwaite Lane, Barbon	0.3454	8
BOL1	Bolton Abbey	Land west of Mitford Cottages, Bolton Abbey	0.3020	6
CPY1	Carperby	Land at East End Farm, Carperby	0.2713	6
EMB2	Embsay	Land north of Brackenley Lane and Dales Avenue, Embsay	4.0224	100
EMB3	Embsay	Land south of 53 Brackenley Lane, Embsay	0.5565	19
GRA1	Grassington	Land north of Wharfe View, Grassington	0.4391	8
GRA5	Grassington	Land south east of Aynham Close, Grassington	1.1757	35
GRA6	Grassington	Land west of Garrs End Lane, Grassington	0.3551	10
GRA7	Grassington	Land north of Moody Sty Lane, Grassington	0.6527	20
HAW1	Hawes	Land south and west of Woodburn, Burtersett Road, Hawes	0.5051	8
HAW2	Hawes	Land south of Northgate House, Burtersett Road, Hawes	0.6298	20
HAW3	Hawes	Land east of Northgate House, Burtersett Road, Hawes	0.2007	7
HAW4	Hawes	Land at Kirkbrides Way, Hawes	0.4973	15
HOR1	Horton in Ribblesdale	Land between Hillside and recreation ground, Station Road, Horton	0.7411	18

[21] This is a preliminary figure based on the current standard density requirement of 35 dwellings per hectare. In some cases, other site-specific constraints had also been factored into an adjusted figure. The figure was not authoritative at this stage.

HOR6	Horton in Ribblesdale	Land west of B6479 opposite Rowe Garth, Horton-in-Ribblesdale	0.6175	10
LON5	Long Preston	Land rear of Moorfields & Guy's Cottages, Long Preston	0.4662	16
LON8	Long Preston	Land between Nos 36 and 38 Main Street, Long Preston	0.3144	8
MIL3	Millthrop	Land opposite Derry Cottages, Millthrop	0.2615	9
NAT2	Nateby	Land opposite Fell View Garage, Nateby	0.2358	6
NLU1	Newbiggin on Lune	Land west of Ash Dene, Newbiggin-on-Lune	0.3964	10
NLU2	Newbiggin on Lune	Land at The Warehouse, Newbiggin-on-Lune	0.2285	7
ORT1	Orton	Land east of Ashfield Court, Orton	0.2582	9
REE3	Reeth	Land north of Back Lane, Reeth	0.2165	8
SED2	Sedbergh	Land south of Station Road and east of Busk Lane, Sedbergh	1.1109	40
SED9	Sedbergh	Land at Kings Yard, Bainbridge Road, Sedbergh	0.1374	10
SED15	Sedbergh	Land west of Guldrey Fold, Sedbergh	0.9047	30
SED16	Sedbergh	Land north of Medical Centre, Sedbergh	0.4571	12
THR1	Threshfield	Land east of Wharfeside Avenue, Threshfield	0.4571	16
THR3	Threshfield	Land rear of Manor House Farm & Village Institute, Threshfield	0.4076	10
THR4	Threshfield	Land north of Upper Wharefdale School, Threshfield	4.4868	100
TOTAL			22.245	600

2.25 For the 33 sites recommended for further investigation, a short report was prepared for each, summarising the issues raised from the landscape sensitivity assessment and constraints-checking process. These reports can be found at Appendix 6 and explain why the site was deemed to warrant further investigation and the issues that remained to be resolved.

2.26 The site assessment reports allowed a more informed estimate of potential dwelling yield based on some of the constraints identified. These estimates were indicative and subject to change as the process of refining site options continued.

2.27 All of the 33 shortlisted sites still had some issues to overcome before a firm conclusion could be made regarding their suitability. It was decided that they should be the subject of a consultation (Consultation No. 6) to engage the public and help understand these issues, together with any other issues not yet identified.

2.28 The shortlisted sites still presented a somewhat unbalanced distribution across the Local Plan area. Figure 9 below illustrates how Craven District was over-represented, with all other Districts correspondingly under-represented, especially Richmondshire:

Figure 9: Initial shortlist of potential housing development sites – geographical distribution (March 2023)

District	Indicative dwellings on identified sites	Indicative dwellings as a percentage of total	District population as a percentage of total YDNP population
Craven	389	65%	42%
Eden	32	5%	10%
Richmondshire	64	11%	27%
South Lakeland & Lancaster	115	19%	21%
Total	**600**		

2.29 The majority of dwellings provided on the identified sites – 349 or 58% of the total – would have been within the largest Local Service Centres of Grassington/Threshfield (199), Sedbergh (92) and Hawes (50), together with the largest service village Embsay (119).

2.30 As a result of these imbalances, the Authority acknowledged that achieving a more even geographical spread of site options might require parts of Stages 1 and 2 to be repeated. This would also include some wholly new site candidates, or sites that have been dismissed as part of the process already, if new information became available to show that identified constraints could be overcome.

Consultation No.6 – Land for housing development

2.31 In April and May 2023 the National Park Authority conducted a public consultation centred around the 33 shortlisted housing sites in Figure 8. Consultees were asked whether they thought the sites were suitable for development and, if not, whether better alternatives existed that should be considered.

2.32 The consultation received nearly 800 responses comprising over 1,500 separate representations[22]. 48% of these representations concerned the 33 shortlisted sites and over three quarters of these were objections to development, with 27 of the 33 shortlisted sites having received some level of objection. The two sites shortlisted in Embsay received approaching 400 objections each, while two sites either side of Wharfeside Avenue in Threshfield each received approaching 100 objections. The objections raised a range of issues relating to the suitability of the site for development. Some responses in support of particular sites were also received. A summary of the comments received for each of the sites has been incorporated into the initial site analysis in Appendix 6.

2.33 A further 14% of the representations received embraced suggestions and comments about alternative site allocations, beyond the 33 that had been shortlisted for public consultation. This included responses that questioned the rejection of some sites, together with newly suggested alternatives.

[22] A full report on the consultation response can be found here: https://www.yorkshiredales.org.uk/wp-content/uploads/sites/13/2023/07/Consultation-No.6-Summary-of-consultation.pdf

STAGE 2B – CONSIDERATION OF ADDITIONAL SITES

2.34 In June 2023 the Authority resolved to form a Local Plan Advisory Group. The Group's role was to consider the list of potential sites, including those already shortlisted (Stage 2A above) and other alternatives, in more detail, taking account of the consultation responses and additional information sought regarding constraints to development. This group, made up of seven Members of the National Park Authority, first met in July 2023.

Screening additional site options

2.35 The first task of the Local Plan Advisory Group was to determine which sites should be considered in addition to the 33 that had already been shortlisted. The Group was presented with five categories of site that could supplement these sites, consisting of:

A. newly submitted alternatives – sites that landowners submitted during Consultation No.6 – (*7 sites)*;
B. previously submitted (and dismissed) alternatives – where landowners had lodged objections during Consultation No.6 – *(21 sites)*;
C. previously submitted (and dismissed) alternatives – where objections had not been lodged during Consultation No.6 – (*77 sites)*;
D. other speculative site suggestions – those suggested by members of the public during Consultation No.6, but where availability of the land had not been established – (*8 sites)*;
E. employment site alternatives – sites currently allocated/used for employment purposes where the Authority had so far deferred any decision regarding potential residential redevelopment – (*5 sites)*.

With 118 sites in total, it was necessary to undertake a screening exercise to determine which sites should be prioritised for review. The screening process conclusions for each category of site was as follows.

A. Newly submitted alternatives

2.36 Consultation No. 6 resulted in the submission of a limited number (7) of additional site nominations from landowners. These were the only sites considered capable of yielding 5 or more houses in line with the minimum

threshold for allocation set out in Stage 1 above[23]. These sites are set out in Figure 10 below:

Figure 10 – newly submitted site alternatives

Site ref	District	Site	Estimated capacity
Craven			
HET2	Craven	Land west of Hetton House, Hetton	6-8
HOR5[24]	Craven	Land east of Chapel Lane and south of B6479, Horton-in-Ribblesdale	8-10
HOR7	Craven	Land to the rear of the Golden Lion Hotel, Horton in Ribblesdale	8-10
LON9	Craven	Land north west of Long Meadow, Long Preston	8-10
THR9	Craven	Land east of Wharfeside Avenue, Threshfield (THR1 extension)	35-45
Richmondshire			
EWT2	Richmondshire	Land between Low Thorpe Farm and Chance Cottage, East Witton	5-6
WBU1	Richmondshire	Land at Town Head, West Burton	5-8

2.37 The Local Plan Advisory Group elected to further review all of these sites, given that, with the exception of HOR5, they had not previously been assessed and therefore their suitability for development remained to be established. In the case of HOR5, given that landowner willingness to release this site had been confirmed during Consultation No. 6, the Local Plan Advisory Group considered it should be reviewed to determine whether it could be capable of supporting an allocation, rather than being regarded as a windfall site.

B. <u>Previously submitted (and dismissed) alternatives contested by landowners</u>

2.38 A total of 50 sites submitted by landowners during the original call for sites were not shortlisted for further investigation due to development constraints. Consultation No. 6 resulted in 21 of these being challenged, with requests from landowners to reconsider them, sometimes accompanied by further specialist reports in an attempt to demonstrate that the reasons for dismissal were either not valid or could be overcome. This included two sites – AIR1 & CPY1 – where only part of a larger site had been included in the original shortlist of 33 sites, with the landowners arguing in favour of extending the allocated area to embrace adjoining land. The full list of these 21 sites is summarised in Figure 11 below.

[23] Some smaller sites were suggested, and these were considered as part of the review of housing development boundaries during Stage 3 of the assessment (windfall).
[24] While this site was only submitted by the landowner in Consultation No.6, it had already been investigated by Officers as a speculative site during the initial stage of site investigation (Stage 2A).

Figure 11 – Dismissed sites contested by landowners during Consultation No. 6

Ref	Location	Main reason for dismissal	Change sought
Craven			
AIR1	Land at Hallgarth, Airton	Landscape/settlement character impact	Consider larger area
AIR2	Land south of Hambledon House, Airton	Highway access	Reinstate site/boundary change
BUR1	Land south of Fell Hotel, Burnsall	Landscape/settlement character impact	Reinstate site
CRA3	Land btwn. Fell Lane and Back Lane, Cracoe	Highway access; neighbouring amenity	Allocate site, rather than treat as infill
EAS1	Land east of Cruik Barn, Barden Road, Eastby	Landscape/settlement character impact	Reinstate site (reduced area)/DB change
EAS2	Land east of 23 Kirk Lane, Eastby	Highway access, surface water flooding	Reinstate site (reduced area)
EMB1	Land at Holly Farm, Embsay	Highway access, farm displacement	Reinstate site/boundary change
GIG1	Land west of Stackhouse Lane, Giggleswick	Landscape/settlement character impact	Reinstate site
GRA4	Land adjacent to Ash View, Grassington	Landscape/settlement character impact	Consider larger area
LON1	Land rear of Hartley Green, Long Preston	Landscape/settlement character impact, surface water flood risk,	Reinstate site (reduced area)
LON2/ LON7	Land east of 20 Main Street, Long Preston / Land north/west of Megs Croft, Long Preston	Landscape/settlement character impact	Reinstate site
LON4	Land south of Tranmere Cottage, Long Preston	Landscape/settlement character impact	Reinstate site (reduced area)
SET1	Land north of allotments, Ingfield Lane, Settle	Landscape/settlement character impact	Reinstate site

Richmondshire			
CAR1	Land west of Coverdale Memorial Hall, Carlton	Landscape/settlement character impact	Reinstate site/boundary change
CPY1	Land at East End Farm, Carperby	Landscape/settlement character impact	Consider larger area (croft adjoining)
EWT1	Land north of Low Thorpe Farm, East Witton	Landscape/settlement character impact, proximity to working farm	Reinstate site
GRI1	Land east of Croft Farm, Grinton	Flood risk, displacement of existing uses	Reinstate site
THO2	Land at Chapel Garth, Thoralby	Landscape/settlement character impact	Reinstate site
South Lakeland			
DEN1	Land west of Glebe Fold, Dent	Landscape/settlement character impact	Reinstate site
SED3	Land north of Toll Bar Workshops, Station Road, Sedbergh	Landscape/settlement character impact	Reinstate site (reduced area)

2.39 All 21 sites were re-considered in light of the issues raised during Consultation No.6. As a result, a recommendation was made regarding whether to further review the sites (Appendix 7). Members of Local Plan Advisory Group decided to review 19 of the 21 sites. The remaining two sites – AIR2 & EAS1 – were dismissed from consideration as the initial assessment clearly concluded that they were unsuitable as site allocations. Nonetheless, these two sites had some potential to be considered as small-scale windfall developments, so were included within that process (see Stage 3).

C. Previously submitted (and dismissed) alternatives not contested

2.40 Of the 139 sites originally screened as potential site allocations, 95 were dismissed from consideration, of which 18[25] had been contested by landowners and are listed in the previous section. The remaining 77 dismissed sites had not been contested. These are broken down in Figure 12 below, with a full list included in Appendix 8:

Figure 12: Dismissed sites not contested by landowners

Category	Landowner suggestions	Speculative sites	Total
Sites that were considered too sensitive in landscape terms and dismissed in the first sift	18	14	32
Sites that were considered to have potential for development in landscape terms, but where other constraints e.g. access, heritage, wildlife, flood risk, or a lack of landowner willingness, directed that they be dismissed	14	31	45
Total	32	45	77

2.41 45 of the 77 sites rejected were not ones submitted by landowners through the call for sites but were suggested speculatively by Officers in an attempt to 'leave no stone unturned' and get a more even distribution of potential sites across the Local Plan area.

[25] The difference between this figure and the 21 sites listed in the previous section is 1 site – CRA3 – initially included in development boundaries as a windfall site but where the landowner has sought its allocation, together with 2 sites – AIR1 & CPY1 – included in the 33 shortlisted site allocations, where part but not all of the site has been deemed suitable and the landowner is contesting the remaining omitted portion of the site.

2.42 With some of these sites, initial enquiries were made with landowners regarding availability (where constraints appeared to be less severe), but some landowners declined to have their land considered further or otherwise failed to respond. Were any of these 45 sites to be reconsidered, there would be a significant risk that they would not be available for development.

2.43 With the remaining 32 rejected sites submitted by landowners, although these might be claimed to be available for development, the fact that their rejection had not been contested was not indicative of genuine or sustained development intent.

2.44 Some of the rejected sites did receive some public support during consultation No. 6. (Figure 13). In most cases the support was limited and in almost all cases was motivated by attempts to identify alternatives to sites that were being objected to elsewhere in the same settlement.

Figure 13 – dismissed sites receiving public support during Consultation No. 6

Site ref	Location	Respondents suggesting site as alternative	Landowner site suggestion
CRA1	Land east of Cracoe Primary School, Cracoe	1	YES
CRA2	Land opposite Cracoe Grange Farm, Cracoe	1	YES
CRA4	Land east of Whitakers Barn, Cracoe	1	YES
CRA5	Land between Toppan Farm and Cracoe House Cottage, Cracoe	2	YES
HOR2	Land west of Cragg Hill Road, Horton-in-Ribblesdale	1	NO
HOR3	Land east of Cragg Hill Road, Horton-in-Ribblesdale	1	NO
THR2	Land north of Skirethorns Lane and east of B6160, Threshfield	1	NO
THR6	Land south of Skirethorns Lane, Threshfield	8	NO
THR7	Land east of the B6160 at Simon Seats View, Threshfield	30	NO
THR8	Land east of the junction between the B6160 and Monkholme Lane, Threshfield	27	NO

2.45 Each of the 77 uncontested dismissed sites were reviewed to determine whether this decision warranted reinvestigation. In total just 10 were recommended for review, given that many had clear constraints to development and/or a lack of clear landowner willingness to release the site for development. The Local Plan Advisory Group elected to add a further site (THO1) to this list. The sites that were selected for review from this cohort are included in Figure 14 below:

Figure 14 – List of uncontested sites selected for review

Site ref	Location
DEN2	Land south west of Ghyllside, Dent
GAY1	Land north of Marridales, Gayle
HEB1	Land west of Brayshaw Lane, Hebden
HOR3	Land east of Cragg Hill Road, Horton-in-Ribblesdale
LON3	Land between Jubilee Croft and Back Lane, Long Preston
SET2	Land opposite Parks View, Ingfield Lane, Settle
THO1	Land south of Village Hall and The Grange, Thoralby
THR5	Land north of the B6265, opposite Woodlands View, Threshfield
THR6	Land south of Skirethorns Lane, Threshfield
THR7	Land east of the B6160 at Simon Seats View, Threshfield
THR8	Lane east of B6160, Threshfield

D. Speculative site suggestions

2.46 Members of the public speculatively suggested a small number of sites as alternatives. In some cases, these suggestions were motivated by attempts to identify alternatives to sites that had been included in Consultation No 6 as part of the original shortlist of 33 sites.

2.47 Most of the suggested sites were affected by fundamental constraints, in addition to there being no guarantee of landowner availability. Some were outside of settlements and so contrary to the Local Plan's spatial strategy of focussing development in/around services, infrastructure and existing social networks. Others were already allocated for other uses, so raised issues in relation to displacement. Finally, some were just too small to be allocated sites, so would be more appropriately considered as part of the review of development boundaries (Stage 3).

2.48 The Local Plan Advisory Group considered these site suggestions (Appendix 9) and resolved that only one – THR10 (Highway depot) – should be reviewed as the only site that was a credible option for a housing allocation.

E. Employment site alternatives

2.49 As part of the initial Stage 2A shortlisting process, four existing employment sites were highlighted as having some potential for housing redevelopment. This was either because they were previously developed but vacant and underused, or greenfield sites that have long been allocated for employment uses where development had not occurred. Since the Stage 2A assessment, a fifth site at the former Langcliffe Paper Mill had come forward to supplement these sites, listed in Figure 15 below.

Figure 15: Employment sites

Ref	Site	Type
SED4	Land at former Baliol School, Cautley Road, Sedbergh	Brownfield site currently allocated for business uses
REE6	Land north of Dales Centre, Reeth	Greenfield site currently allocated for business uses
HOR2	Land west of Cragg Hill Road, Horton-in-Ribblesdale	Greenfield site currently allocated for business uses
ASK2	Former Carrs Billington depot, Askrigg	Brownfield site not currently allocated for business uses
LAN2	Former Langcliffe Paper Mill, Langcliffe	Brownfield site not currently allocated for business uses

2.50 Stage 2A did not reach a firm conclusion on these sites and deferred the assessment of whether they should be allocated, wholly or partly, for residential development (see paras 2.16-2.20 above).

2.51 The Authority's policies have a long-held presumption in favour of retaining business sites in employment-generating uses, given their relative scarcity inside the National Park and because of the importance of maintaining employment opportunities to support housing growth and retain or attract working-age households.

2.52 Aside from the loss of employment opportunity, three of the sites are occupied by buildings that are vacant or with limited use and would therefore be eligible for 'Vacant Building Credit', should they be allocated for residential development. Vacant Building Credit is a national policy initiative aimed at incentivising redevelopment of brownfield sites by offsetting the floor area of existing buildings against any affordable housing requirements that would normally apply. Allocating these sites for housing would substantially reduce or extinguish any affordable housing potential in conflict with one of the main

imperatives for allocating housing sites in the Local Plan (i.e. to provide affordable housing).

2.53 The Local Plan Advisory Group considered these sites (Appendix 10) and resolved that, in all cases, the principle of residential allocation was not acceptable. It resolved that any residential element would be most suitably considered on an exceptional basis so that Vacant Building Credit would not apply and so that the issues presented by the loss of their future employment potential could be more favourably weighed against the benefits of affordable housing provision. As a result, these sites were dismissed at this stage and not subjected to any further review.

Initial overall list of supplementary sites identified for review

2.54 In total, 110 sites were screened to assess whether they could realistically supplement, or offer alternatives to, the 33 sites shortlisted as part of Stage 2A. This screening process, as set out above, concluded that a total of 38 of these sites were suitable for further review. These sites are shown in Figure 16 overleaf.

2.55 The combined potential dwelling yield of these 38 sites was over 600 units, which would effectively double the available options for housing growth already shortlisted as part of Stage 2A. The geographical distribution still remained skewed towards the Craven area which accounted for three quarters of the potential dwelling yield from the additional site options. There were some, more limited, additional site options in the north and west of the National Park, which remained under-represented compared to Craven.

2.56 The 38 additional sites proceeded to the next stage of the assessment and a more detailed review of whether they represented realistic options for housing allocations in the Local Plan, as set out in the following section.

Figure 16 – Sites (previously dismissed or not yet considered) shortlisted for review

Site ref	Site location	Review category	Yield[26]
Craven District			
AIR1	Land at Hallgarth, Airton	B – (Part) dismissed site contested by landowner	12
BUR1	Land south of Fell Hotel, Burnsall	B - Dismissed site contested by landowner	6
CRA3	Land between Fell Lane and Back Lane, Cracoe	B - Dismissed site contested by landowner	5
EAS2	Land east of 23 Kirk Lane, Eastby	B - Dismissed site contested by landowner	8
EMB1	Land at Holly Farm, Embsay	B - Dismissed site contested by landowner	17
GIG1	Land west of Stackhouse Lane, Giggleswick	B - Dismissed site contested by landowner	9
GRA4	Land adjacent to Ash View/Garsdale, Garrs End Lane, Grassington	B - Dismissed site contested by landowner	5
HEB1	Land west of Brayshaw Lane, Hebden	C - Dismissed site not contested by landowner	5
HET2	Land west of Hetton House, Hetton	A - Newly submitted site	7
HOR3	Land east of Cragg Hill Road, Horton-in-Ribblesdale	C - Dismissed site not contested by landowner	11
HOR5	Land east of Chapel Lane and south of B6479, Horton-in-Ribblesdale	A - Newly submitted site	9
HOR7	Land to the rear of the Golden Lion Hotel, Horton in Ribblesdale	A - Newly submitted site	9
LON1	Land between Hartley Green and Back Lane, Long Preston	B - Dismissed site contested by landowner	17
LON2	Land east of 20 Main Street, Long Preston	B - Dismissed site contested by landowner	11
LON3	Land between Jubilee Croft and Back Lane, Long Preston	C - Dismissed site not contested by landowner	7
LON4	Land south of Tranmere Cottage, Hoyle Hill, Long Preston	B - Dismissed site contested by landowner	5
LON7	Land north and west of Megs Croft, Long Preston	B - Dismissed site contested by landowner	9

[26] Initial estimate prior to full assessment. Figures for AIR1 and CPY1 include the part of the site already shortlisted for consideration prior to Consultation No.6, together with an additional area that was dismissed but contested by the landowner.

LON9	Land north west of Long Meadow, Long Preston	A - Newly submitted site	9
SET1	Land north of allotments, Ingfield Lane, Settle	B - Dismissed site contested by landowner	40
SET2	Land opposite Parks View, Ingfield Lane, Settle	C - Dismissed site not contested by landowner	10
THR5	Land north of the B6265, opposite Woodlands View, Threshfield	C - Dismissed site not contested by landowner	60
THR6	Land south of Skirethorns Lane, Threshfield	C - Dismissed site not contested by landowner	20
THR7	Land east of the B6160 at Simon's Seat View, Threshfield	C - Dismissed site not contested by landowner	30
THR8	Land east of the junction between B6160/Monkholme Lane, Threshfield	C - Dismissed site not contested by landowner	100
THR9	Land east of Wharfeside Avenue, Threshfield (THR1 extension)	A - Newly submitted site	40
THR10	Land at Threshfield Highways Depot	D - Site suggested speculatively by public	12
Richmondshire District			
CAR1	Land west of the Coverdale Memorial Hall, Carlton	B - Dismissed site contested by landowner	6
CPY1	Land at East End Farm, Carperby	B – (Part) dismissed site contested by landowner	12
EWT1	Land north of Low Thorpe Farm, East Witton	B - Dismissed site contested by landowner	6
EWT2	Land between Low Thorpe Farm and Chance Cottage, East Witton	A - Newly submitted site	5
GAY1	Land north of Marridales, Gayle	C - Dismissed site not contested by landowner	10
GRI1	Land east of Croft Farm, Grinton	B - Dismissed site contested by landowner	8
THO1	Land south of Village Hall and The Grange, Thoralby	C - Dismissed site not contested by landowner	30
THO2	Land between Prospect House and Chapel Garth, Thoralby	B - Dismissed site contested by landowner	12
WBU1	Land at Town Head, West Burton	A - Newly submitted site	6
South Lakeland District			
DEN1	Land west of Glebe Fold, Dent	B - Dismissed site contested by landowner	9
DEN2	Land south west of Ghyllside, Dent	C - Dismissed site not contested by landowner	6
SED3	Land north of Toll Bar Workshops, Station Road, Sedbergh	B - Dismissed site contested by landowner	45

Further assessment of review sites

2.57 Following on from the screening stage, the 38 sites selected for review were subjected to further assessments to determine, in more detail, their suitability for development. The conclusions of these assessments are summarised below. Sites are grouped into the same categories as were used in the initial screening process above.

A. Newly submitted alternatives

2.58 All seven newly submitted sites were assessed for development constraints and a recommendation was made on whether to further investigate each site as a potential site allocation (Appendix 11). The Local Plan Advisory Group agreed these recommendations, resulting in three sites – HOR5, LON9 and THR9 being further investigated as potential site allocations.

2.59 Four sites were not deemed suitable for further investigation. Two of these – HET2 & HOR7 - were considered to have some possible potential for smaller-scale windfall development. As a result, they were referred for consideration as part of the review of housing development boundaries (see Stage 3 below). The remaining two sites – EWT2 & WBU1 – were dismissed because the initial assessment clearly concluded that they were unsuitable.

B. Previously submitted (and dismissed) alternatives contested by landowners

2.60 Nineteen of these sites had been selected for further review. Appendix 12 contains analysis of each which resulted in a recommendation that 6 sites be further investigated as potential site allocations (EMB1; LON1; LON2; LON4; LON7; SED3). The Local Plan Advisory Group then elected to add a seventh site (THO2).

2.61 Ten sites (AIR1; BUR1; CAR1; CPY1; DEN1; EAS2; EWT1; GIG1; GRA4; SET1) were deemed unlikely to be suitable for development and so were dismissed, albeit some of these might still be suitable as rural exception sites (see Stage 3 below). Two of these sites (AIR1 & CPY1) already had areas shortlisted as part of Stage 2A, so the decision here is not outright dismissal of the site, but rather confirmation that the developable area should not be extended further into adjoining land.

2.62 The remaining two sites (CRA3 & GRI1) weren't considered suitable for a specific housing site allocation due to constraints and limited capacity. They were, however, wholly or partly included within development boundaries so that

they could be brought forward for a smaller development on a windfall basis (see Stage 3 below).

C. Previously submitted (and dismissed) alternatives not contested

2.63 Eleven of these sites had been selected for further review. Appendix 13 contains further analysis of each which resulted in a recommendation that 6 sites be further investigated as potential site allocations (HOR3, LON3, THR5, THR6, THR7, THR8). The Local Plan Advisory Group elected to add a seventh site (THO1).

2.64 The remaining four sites (DEN2, GAY1, HEB1, SET2) were dismissed from further consideration, albeit some of these might still be suitable as rural exception sites (see Stage 3 below).

D. Speculative site suggestions

2.65 Just one of these sites was selected for review (THR10). The Local Plan Advisory Group concluded that this site was not suitable for further consideration based on the report at Appendix 14.

Final overall list of supplementary sites identified for review

2.66 Of the 38 sites identified for further review, 17 were deemed worthy of further detailed investigation (Figure 17). This effectively placed these sites on the same footing as the 33 sites shortlisted in Stage 2A, meaning that a total of 50 sites were now available for further investigation. The conclusions of these further investigations are set out in Stage 2C below.

Figure 17 – Sites (previously dismissed or not yet considered) shortlisted for review

Site ref	Site location	Review category	Yield[27]
Craven District			
EMB1	Land at Holly Farm, Embsay	B - Dismissed site contested by landowner	17
HOR3	Land east of Cragg Hill Road, Horton-in-Ribblesdale	C - Dismissed site not contested by landowner	11
HOR5	Land east of Chapel Lane and south of B6479, Horton-in-Ribblesdale	A - Newly submitted site	9
LON1	Land between Hartley Green and Back Lane, Long Preston	B - Dismissed site contested by landowner	17
LON2	Land east of 20 Main Street, Long Preston	B - Dismissed site contested by landowner	11
LON3	Land between Jubilee Croft and Back Lane, Long Preston	C - Dismissed site not contested by landowner	7
LON4	Land south of Tranmere Cottage, Hoyle Hill, Long Preston	B - Dismissed site contested by landowner	5
LON7	Land north and west of Megs Croft, Long Preston	B - Dismissed site contested by landowner	9
LON9	Land north-west of Long Meadow, Long Preston	A - Newly submitted site	9
THR5	Land north of the B6265, opposite Woodlands View, Threshfield	C - Dismissed site not contested by landowner	60
THR6	Land south of Skirethorns Lane, Threshfield	C - Dismissed site not contested by landowner	20
THR7	Land east of the B6160 at Simon's Seat View, Threshfield	C - Dismissed site not contested by landowner	30
THR8	Land east of the junction between B6160/Monkholme Lane,	C - Dismissed site not contested by landowner	100
THR9	Land east of Wharfeside Avenue, Threshfield (THR1 extension)	A - Newly submitted site	40
Richmondshire District			
THO1	Land south of Village Hall and The Grange, Thoralby	C - Dismissed site not contested by landowner	30
THO2	Land between Prospect House and Chapel Garth, Thoralby	B - Dismissed site contested by landowner	12
South Lakeland District			
SED3	Land north of Toll Bar Workshops, Station Road, Sedbergh	B - Dismissed site contested by landowner	45

[27] Initial estimate prior to full assessment.

STAGE 2C – FURTHER ASSESSMENTS & FINAL SHORTLISTING

2.67 The 50 sites carried forward from stages 2A & 2B were subjected to further assessments of suitability for development. These further investigations centred on landscape sensitivity, highways requirements, drainage and other clarifications.

Landscape sensitivity review

2.68 The initial sifting process at Stage 2A was informed by landscape sensitivity assessments (see paras 2.3-2.10 above). Some of the conclusions of these assessments were contested during Consultation No.6, both by objectors to shortlisted sites, and the landowners of dismissed sites. As a result, more detailed site assessments were commissioned[28]. This focussed on settlements where landscape sensitivity was most heavily contested during Consultation No. 6 and where several site options occurred in close proximity to one another, giving rise to the potential for cumulative impacts. A total of 39 of the 50 sites carried forward were subject to landscape sensitivity review. This included all sites in Barbon, Embsay, Grassington, Hawes, Horton-in-Ribblesdale, Long Preston, Sedbergh (including Millthrop) and Threshfield.

2.69 Two of these sites (LON9 & THR9) had been newly submitted during Consultation No. 6 and so had not been included in the original 2022 LSA. These sites were both assessed for landscape sensitivity using the same methodology as the 2022 study. Both sites were attributed 'moderate-high' sensitivity indicating that they were not suitable for development in landscape terms.

2.70 All 39 sites were then subjected to more detailed assessments that included a review of the initial sensitivity analysis to verify the judgements it contained. Sites were assessed according to several key gateway and local views to assess impacts individually and cumulatively with other sites in the same settlement.

2.71 Following review, the landscape sensitivity ratings of 31 out of the 39 sites were verified as being correct.

[28] Sheils Flynn (2024) Search for potential housing sites: Review of landscape sensitivity assessment; Part 1 (Embsay) Part 2 (Grassington/Threshfield) Part 3 (Hawes) Part 4 (Horton-in-Ribblesdale), Part 5 (Long Preston), Part 6 (Barbon); Part 7 (Sedbergh/Millthrop).

2.72 With the remaining 8 sites, some adjustments to sensitivity ratings were made. In only one case did this result in an increase in sensitivity to a level where significant adverse landscape impacts were likely, resulting in it being dismissed (BAR1). Six of the remaining seven sites were found to be more sensitive than originally assessed but were all deemed capable of being developed without significant adverse landscape impacts, subject to appropriate mitigation (EMB3, GRA1, SED15, THR4, THR7, THR8). This included adjustments to their developable areas to avoid more sensitive and impactful parts of sites. Finally, in one case (HOR1) it was determined that the original 'moderate' sensitivity rating was correct but that there was scope to reduce this further through an adjustment to the site area. Figure 18 below provides an overview of the sensitivity scoring changes:

Figure 18 – Overview of sensitivity rating changes following landscape review

Site ref	Original LSA rating	2024 Review rating before mitigation	2024 Review rating after mitigation
Barbon			
BAR1	Moderate*	Moderate-high	Moderate-high - dismiss
BAR2	Low-moderate	Low-moderate	Low-moderate
Embsay			
EMB1	Low-moderate	Low-moderate	Low-moderate
EMB2	Moderate-high*	Moderate-high*	Moderate
EMB3	Low	Low-moderate*	Low
Grassington			
GRA1	Moderate*	Moderate-high*	Moderate
GRA5	Moderate-high*	Moderate-high*	Moderate
GRA6	Moderate-high*	Moderate-high*	Moderate[29]
GRA7	Moderate	Moderate	Moderate
Threshfield			
THR1	Moderate-high*	Moderate-high*	Moderate
THR3	Low-moderate	Low-moderate	Low-moderate
THR4	Low-moderate	Moderate-high*	Moderate
THR5	Moderate-high*	Moderate-high*	Moderate
THR6	Moderate-high	Moderate-high	Moderate-high - dismiss
THR7	Low-moderate	Moderate*	Low-moderate
THR8	Moderate	Moderate-high*	Moderate
THR9	Moderate-high	Moderate-high	Moderate-high - dismiss
Haw**es**			
HAW1	Moderate*	Moderate*	Low-moderate
HAW2	Moderate-high*	Moderate-high*	Moderate
HAW3	Moderate	Moderate	Moderate
HAW4	Low-moderate	Low-moderate	Low-moderate
Horton-in-Ribblesdale			
HOR1	Moderate	Moderate*	Low-moderate
HOR3	Moderate*	Moderate*	Low-moderate

[29] This rating becomes moderate-high due to the cumulative landscape impacts should GRA6 & GRA7 be developed together. The LSA review expresses a clear preference for developing GRA7 instead of GRA6.

HOR5	Low-moderate	Low-moderate	Low-moderate
HOR6	Moderate-high*	Moderate-high*	Moderate
Long Preston			
LON1	Moderate -high*	Moderate-high*	Moderate
LON2	Moderate -high	Moderate-high	Moderate-high - dismiss
LON3	Moderate -high*	Moderate-high*	Moderate
LON4	Moderate -high	Moderate-high	Moderate-high - dismiss
LON5	Moderate -high*	Moderate-high*	Moderate
LON7	Moderate	Moderate	Moderate
LON8	Moderate	Moderate	Moderate
LON9	Moderate-high	Moderate-high	Moderate-high - dismiss
Sedbergh/Millthrop			
SED2	Moderate -high*	Moderate-high*	Moderate
SED3	Moderate -high	Moderate-high	Moderate-high - dismiss
SED9	Low-moderate	Low-moderate	Low-moderate
SED15	Moderate*	Moderate	Moderate
SED16	Moderate -high*	Moderate-high*	Moderate
MIL3	Moderate -high*	Moderate-high*	Moderate

Highways

2.73 Further discussions with the two local highway authorities (North Yorkshire and Westmorland & Furness) took place to explore the issues around safe access and local road conditions. All sites were visited by highways officers and general advice offered regarding the prospects of securing an access into the site that met the relevant guidelines.

Drainage

2.74 Further engagement with key infrastructure providers focussed on the utility companies responsible for drainage and sewage treatment (United Utilities and Yorkshire Water). Some feedback was also received from the two unitary Councils in their capacities as lead local flood risk authorities.

2.75 The capacity of sewage treatment works and the potential for surcharges into watercourses is an issue of national prominence and was commonly referenced in objections received during Consultation No. 6. The 1991 Water Industry Act provides the basis of the current regulatory framework that confirms a right to connect to the public sewer for foul flows. As such, the respective utility providers have an obligation to allow new connections as a result of development occurring and an infrastructure charging regime is in place to ensure ring-fenced funding for network reinforcements required to facilitate these new connections. In light of this regulatory backdrop and feedback from utility providers to date, there is no suggestion that adequate foul drainage could not be provided for developments of the scale proposed, however further investigations would still be needed at the detailed planning stage in order to

confirm arrangements for connections and potential enhancements to foul drainage and sewage treatment infrastructure.

2.76 Feedback from the utility companies emphasises the importance of additional surface water drainage loads associated with development being directed away from combined sewerage systems. This is because high volumes of surface water run-off discharging into combined drainage systems, typically during significant rainfall events, is a common cause of sewer flooding and surcharges from sewage treatment works. While the right to connect to a public sewer outlined above does extend to include surface water flows in most circumstances, there is a long-established principle of adopting a hierarchical approach to surface water drainage, favouring drainage into the ground (infiltration), followed by drainage to surface water bodies, followed by drainage to surface water drains, as alternatives to combined sewers[30]. It will be important therefore for all sites allocated in the Local Plan to demonstrate that they can provide a suitable drainage strategy that avoids discharging to combined sewers as far as is practicable. Once again, this is an area where some further investigation at the detailed design stage will be required to confirm the feasibility of alternative drainage locations.

Other clarifications

2.77 Further exploration of other key constraints highlighted at Stage 2A was also undertaken. This included issues such as the impact upon heritage assets (including conservation areas, listed buildings, scheduled monuments and non-designated heritage assets), as well as flood risk, wildlife and trees.

2.78 Appendix 15 contains a summary report of these further investigations for each of the 50 sites, together with a recommendation for each site. On the basis of these reports, the Local Plan Advisory Group determined that 23 sites should be taken forward as preferred housing allocations, as set out in Figure 19 below.

[30] National Planning Practice Guidance Paragraph: 056 Reference ID: 7-056-20220825; Drainage hierarchy principles also incorporated into adopted Local Plan Policy CC2,

Figure 19 - Final shortlist of preferred housing site allocations, July 2024

Site reference	Settlement	Site address	Developable site area (hectares)	Indicative capacity (dwellings)
AIR1	Airton	Land at Hallgarth, Airton	0.1627	5
BOL1	Bolton Abbey/Bridge	Land west of Mitford Cottages, Bolton Abbey	0.3020	6
CPY1	Carperby	Land at East End Farm, Carperby	0.2713	6
GRA5	Grassington	Land south-east of Aynham Close, Grassington	0.8991	25
GRA7	Grassington	Land north of Moody Sty Lane, Grassington	0.6515	21
HAW1	Hawes	Land south and west of Woodburn, Burtersett Road, Hawes	0.5372	6
HAW2	Hawes	Land south of Northgate House, Burtersett Road, Hawes	0.6348	16
HAW3	Hawes	Land east of Northgate House, Burtersett Road, Hawes	0.2001	6
HAW4	Hawes	Land at Kirkbrides Way, Hawes	0.4969	10
HOR6	Horton	Land west of B6479, Rowe Garth, Horton-in-Ribblesdale	0.6319	11
LON5	Long Preston	Land rear of Moorfields & Guy's Cottages, Long Preston	0.4662	12
LON8	Long Preston	Land between Nos 36 and 38 Main Street, Long Preston	0.3143	10
NAT2	Nateby	Land opposite Fell View Garage, Nateby	0.2359	7
NLU1	Newbiggin-on-Lune	Land west of Ash Dene, Newbiggin-on-Lune	0.3966	9
NLU2	Newbiggin-on-Lune	Land at The Warehouse, Newbiggin-on-Lune	0.2286	7

ORT1	Orton	Land east of Ashfield Court, Orton	0.2581	8
SED2	Sedbergh	Land south of Station Road and east of Busk Lane, Sedbergh	0.9634	25
SED9	Sedbergh	Land at Kings Yard, Bainbridge Road, Sedbergh	0.1374	7
SED15	Sedbergh	Land west of Guldrey Fold, Sedbergh	0.9064	25
SED16	Sedbergh	Land north of Medical Centre, Sedbergh	0.4713	12
THR4	Threshfield	Land north of Upper Wharfedale School, Threshfield	2.3608	60
THR5	Threshfield	Land north of Station Road, Threshfield	0.6955	15
THR8	Threshfield	Land east of B6160, Threshfield	2.4061	60
			Total	369

2.79 Of the 33 sites shortlisted in March 2023 as part of stage Stage 2A of the assessment, 21 remain shortlisted, albeit some have adjusted site areas/capacities. Of the 17 sites that were investigated following Stage 2B (newly submitted sites and sites where the decision to dismiss has been reviewed), only 2 are shortlisted options (THR5 & THR8).

2.80 Site capacity has been adjusted for each of the 23 preferred sites following changes to their developable area or other constraints identified. They now have an estimated combined yield of 369 dwellings (Figure 19).

2.81 In almost all cases, the estimated site capacity is now below the 35 dwellings per hectare benchmark because of additional constraints and the need to produce suitable layouts in sympathy with the surroundings. At 35 dwellings per hectare the 23 sites would have a capacity of nearly 490 dwellings. At this stage, overall capacity remains an estimate and individual sites could deliver more or less depending on detailed scheme design.

2.82 The geographical distribution remains skewed towards the former Craven part of the National Park (Figure 20). The review of additional sites (Stage 2B) has failed to address this issue, which was perhaps not surprising, since the additional sites mainly arose within Craven. Ultimately, the distribution of sites is a function of the suitability of land for development (having regard to all of the constraints) and landowner willingness to release land (influenced by market conditions, developer interest and other factors). The HLAA has demonstrated that it is not possible to apportion growth precisely across an area of such deep rurality as the National Park, where there are relatively few unconstrained site options available.

Figure 20: Final shortlist of potential housing development sites – geographical distribution

District	Indicative dwellings on identified sites	Indicative dwellings as a percentage of total	District population as a percentage of total YDNP population
Craven	225	61%	42%
Eden	31	8%	10%
Richmondshire	44	12%	27%
South Lakeland & Lancaster	69	19%	21%
Total	369		

Dismissed sites

2.83 Some of the 27 sites that were dismissed as potential site allocations could still have some development potential. One of them (AUS1) had already received planning permission and has now reached an advanced stage of construction. This meant that there was little to be gained from re-allocating it, unlike other sites that have received planning permission (AIR1, HOR6, LON8 & SED9), or are subject to current planning applications (GRA7), where development has yet to commence. Three of the 27 sites are included within development boundaries and so could be brought forward as infill developments through a planning application (HOR5, REE3, THR3 – see Stage 3 below).

2.84 Some of the remaining 23 sites might also be explored as potential rural exception sites, so that the constraints identified (that have led to them being rejected as site allocations) can be weighed against the benefits of affordable housing provision. This 'planning balance' will depend on the nature of the constraint and the degree of harm that will result from development. These issues are discussed further in the section on windfall development below (Stage 3).

Consultation No. 7 – Preferred sites for housing development

2.85 In September and October 2024 the National Park Authority conducted a final informal public consultation centred around the 23 shortlisted housing sites in Figure 19 above. The consultation received 262 responses comprising 969 separate representations[31].

2.86 A minority of these responses concerned potential alternative sites for allocation, beyond the 23 shortlisted. A total of 28 alternative sites were suggested (Appendix 16) and consisted of:

- 21 sites previously assessed and dismissed during Stage 2 of the HLAA process;
- 7 sites not previously considered.

2.87 For those sites previously submitted and dismissed, it was not considered that the representations submitted provided sufficient information to overcome the original reasons for their rejection. None of the newly submitted sites were considered to represent viable sites for allocation, for the reasons set out in Appendix 16.

2.88 Around a third of responses to Consultation 7 referenced site-specific issues with the 23 sites identified as preferred sites for housing allocation. These were

[31] A full report on the consultation response can be found here: https://www.yorkshiredales.org.uk/wp-content/uploads/sites/13/2024/12/Report-of-Consultation-No7-Nov-2024.pdf

dominated by comments on sites shortlisted in Threshfield. A summary of the comments received for each of the sites has included in Appendix 17.

2.89 Although some new objections were lodged in relation to these sites, many of the issues raised follow a similar pattern to those raised during Consultation No. 6 and so had already been considered by the Local Plan Advisory Group as part of its review of site alternatives during 2023 and 2024. Nonetheless, some further exploration of specific issues raised during Consultation No.7 was undertaken, most notably a Heritage Impact Assessment[32] in response to comments submitted by Historic England. This explored the impacts of developing specific allocated sites that were highlighted as having the greatest risk of impacting on designated heritage assets. This assessment was published as part of the Local Plan's evidence base, alongside the Regulation 19 draft.

2.90 Overall, it was not considered that the issues raised during Consultation No. 7 would warrant a reversal of the decision to allocate these sites, or a decision to supplement/replace them with identified alternatives. In December 2024 the National Park Authority considered a report outlining the full response to Consultation No. 7 and confirmed the inclusion of the 23 shortlisted sites in the Regulation 19 ('Publication') version of the Local Plan, as shown in Figure 19 above.

[32] YDNPA (2025) Yorkshire Dales Local Plan 2025-40 - Heritage Impact Assessment of housing site allocations

STAGE 3 – WINDFALL ASSESSMENT

3.1 Stage 2 of the HLAA is concerned with identifying land that will contribute towards the housing target by allocating development sites on the Local Plan policies map. In addition to potential allocated sites, it is also possible to factor in a further supply of housing land from sources that have not yet been identified. These are referred to as unplanned sites or simply 'windfall'.

3.2 Windfall relates to housing land that comes forward on a more ad-hoc basis. In the National Park it comes forward from policies that permit small-scale house building through infilling or rounding off within settlements, or through the conversion of existing buildings to create new residential dwellings.

3.3 By its nature, windfall housing is unpredictable and therefore a less reliable source of land supply. It is only permitted to be factored into the overall supply of land for future housing if there is clear evidence that it will reliably be delivered during the Local Plan period.

3.4 YDNPA has made a policy decision to try to meet the Local Plan target of 750 new dwellings by 2040 from a planned supply of land (existing planning permissions and allocated sites).

3.5 Nonetheless, an assumption can still be made around windfall delivery because the new Local Plan's policies will continue to permit it. Also, in determining the overall target of 750, YDNPA resolved that this should be regarded as a minimum figure, not a ceiling. Windfall permissions and completions will therefore be useful in topping up the Local Plan housing provision.

3.6 Windfall has always been the predominant source of new housing in the National Park. Prior to 2011, successive housing policies resulted in just 5 sites being allocated for housing development, with all other new housing being windfall. Even with an increased emphasis on allocation from 2012 onwards, only 200 residential units were allocated in the current Local Plan. The Plan was adopted in 2016 and, since then, only 22% of housing completions have come from allocated sites.

3.7 Between 2003/4 and 2024/5, windfall development accounted for an average of 39 completions per annum[33]. Over the last six years this figure has averaged 46 per annum[34]. Windfall permissions have therefore provided a consistent source of land supply beyond formal Local Plan housing allocations in the recent past.

[33] Figures relate to the pre-2016 National Park area because equivalent data at this time depth is not available for the extended area designated in 2016. In reality, therefore, overall windfall completion will be higher across the whole of the extended National Park. Excludes completions from allocated sites and those that resulted in the creation of holiday lets.
[34] Based on a whole National Park geography including the boundary extension area for the period 2019/20-2024/25.

3.8 Looking forward over the next Local Plan period there are a number of different sources of windfall that will continue to play a role in future housing supply. Each is discussed below:

Conversion of traditional buildings

3.9 The majority of windfall supply has historically come from conversions of existing traditional buildings. These have made up 76% of windfall completions over the last 6 years and have resulted in, on average, 35 residential completions each year over that period. Additional policy flexibilities for these changes of use, most notably for the conversion of 'roadside' traditional farm buildings, adopted by the current 2015-30 Local Plan, have opened up a significantly larger potential supply.

3.10 The Annual Monitoring Report[35] for the adopted Local Plan reveals sustained take-up of these windfall opportunities since the policy was extended to include roadside barns. Completions have averaged 22 per annum over the last 6 years. There are strong grounds to suggest that conversions, and barn conversions in particular, will continue to provide a cohort of future planning permissions and completions.

3.11 The new Local Plan is proposing to retain flexibility for the conversion of existing buildings to housing. It is now proposed to widen this out to the whole of the new National Park area, including the parts of Eden and South Lakeland that currently have slightly more restrictive locational policies for conversion (that favour building groups over roadside locations). Other, more bespoke, forms of conversion, such as the reoccupation of former dwellings, the subdivision of existing dwellings and the change of use of community and commercial buildings to housing, will also continue to be facilitated by Local Plan policy. The likelihood therefore is that the conversion of traditional buildings will continue to sustain windfall completions during the new Local Plan period.

Rural workers' dwellings

3.12 As an exception to the general locational approach of focussing new build housing in settlements, remoter dwellings can be permitted where a particular need for them exists. Typically, this relates to some sort of locationally-specific land-based business requiring a continuous presence on-site. Over the last 6 years there have been 23 of these completions (4 per annum). This is in line with the longer-term average of around 3 completions per year, so rural worker

[35] https://www.yorkshiredales.org.uk/wp-content/uploads/sites/13/2024/10/FINAL-23-24-AMR.pdf . These reports relate to the pre-2016 National Park area covered by the adopted Yorkshire Dales Local Plan.

dwellings only make a modest contribution to overall supply. Nonetheless it is a form of windfall housing that emerging policies will continue to support.

Rural exception sites

3.13 Rural exception sites are small-scale new build opportunities wholly or predominantly targeted at affordable housing. They are sites that would not ordinarily be considered suitable for housing development but can be permitted where the significant socio-economic benefits associated with affordable housing provide over-riding justification for development to take place. Rural exception sites have become relatively rare in the Yorkshire Dales. Over the last six years 26 affordable units have been completed on exception sites, with extant permissions for further schemes on two other sites. The slowdown in exception sites is another reason why the Authority is trying to deliver affordable housing through site allocations. In some cases, where allocated sites have been developed by Housing Associations or Community Land Trusts, they can bring them forward as 100% affordable schemes.

3.14 Rural exception sites will continue to be permitted under emerging Local Plan policies. While there can be no guarantees over their potential contribution to windfall supply, there are reasons to believe that more opportunities will be available. Expanded housing development boundaries (see below new build infilling and rounding off below) mean that there is the potential to consider more sites on the edge of settlements (i.e. outside of the boundaries drawn) than is currently the case.

3.15 In addition, numerous sites have been rejected as potential allocated sites because of certain constraints but could still come forward on an exceptional basis. This will depend on the constraints that have rendered them unsuitable for allocation, but provided they are not preclusive to development (e.g. flood risk), there would be scope to weigh the benefits of significantly more affordable housing against the harm caused to matters such as landscape character.

3.16 Active attempts are being made to promote some of these sites by the landowners working in partnership with the National Park Authority, rural housing enablers, housing associations and community land trusts. The apparent lack of suitable sites for allocation in the north of the National Park, and the former Richmondshire District in particular, will mean renewed efforts to try and facilitate exception sites there. The site reports in Appendices 6-15 suggest, in a number of cases, sites that might be brought forward on an exceptions basis.

Extra care

3.17 Current and emerging policies make provision for bespoke residential developments to provide extra or residential care facilities for elderly or vulnerable adults. Proposals for these facilities inside the National Park are rare, the last one being completed 18 years ago, with all other provision since having been in settlements outside the Local Plan area. Emerging policies will continue to provide scope for sites to come forward inside the National Park, but the reality may be that many communities remain dependent on specialist developments in larger towns outside the National Park.

Live work units

3.18 In addition to being permitted within housing development boundaries (see new build infilling and rounding off below), live-work units are also permitted on former industrial sites. Emerging policies seek to retain this additional flexibility for a bespoke form of residential accommodation mixed with business development as part of a single planning unit.

New build infilling and rounding off

3.19 Under current local and national planning strategy, new build housing is targeted at settlements with services, other than in exceptional circumstances such as rural workers' dwellings. This includes allocated sites (Stage 2 above), but also smaller-scale new build developments that infill gaps or occupy small plots on the settlement edge. Such developments have long been permitted in the National Park, albeit with some differences in policy approaches.

3.20 The minimum size of settlement in which new build housing can be permitted varies across the different local plans currently covering the National Park. Infill policy across the majority of the National Park generally favours larger villages with more services.

3.21 Similarly, there is currently a mixed approach to defining where within these settlements new build housing can be constructed. There are currently two different approaches:

1) Across the Yorkshire Dales Local Plan 2015-2030 (former Districts of Richmondshire, Craven and the parishes of Sedbergh, Dent and Garsdale) housing development boundaries have been used to identify 'settlement limits' within which infilling will be permitted. Development boundaries are not an attempt to define a particular community but are simply a planning tool for managing house building so that it does not become too sporadic and harm the landscape. The development boundary approach has the benefit of clarity in terms of a line on a map that is readily understood by

everyone. Despite this, there is no guarantee that a plot of land within a development boundary will automatically be acceptable. Other planning requirements relating to design, impact on neighbours and highway safety will also need to be satisfied. Where they exist, housing development boundaries have been drawn quite tightly around the built-up core of the settlement. This has meant that some outlying parts have been excluded, and many of the limited opportunities for infilling small gap sites have already been taken up.

2) The other approach is a criteria-based one that currently operates in the extension area of the National Park i.e. the parts of the former Districts of Eden, South Lakeland and Lancaster City Council that were added to the National Park in 2016. This uses definitions of what constitutes an acceptable windfall site (including factors such as settlement character, relationship to other properties, access etc.), rather than a fixed boundary on a map. This provides more scope for judgement on a case-by-case basis, but the criteria used are still quite specific and so afford limited flexibility. It also results in less certainty, for example regarding what is and isn't an affordable rural exception site.

3.22 The Authority asked consultees which approach they favoured for the new Local Plan as part of 'Consultation No. 3: Building new homes'. The Authority resolved that development boundaries should be used as the means for identifying where new build 'windfall' housing could happen. It was also resolved that the boundaries should be reviewed with the objective of including more opportunity in towns and larger villages.

3.23 Since development boundaries have been plotted at different times in response to different criteria, they suffer from some inconsistencies and have not always kept pace with the situation on the ground. In the extension areas of Eden, South Lakeland and Lancaster the new Local Plan will be the first time that development boundaries have been defined. All settlements have therefore been comprehensively reviewed to ensure a consistent approach to defining up to date boundaries.

Local service centres and large villages

3.24 The settlement hierarchy agreed by the Authority (Figure 2) includes 53 settlements that needed boundaries to be reviewed, together with 11 that needed boundaries defining for the first time.

3.25 The starting point for the review was to define the core developed footprint of the settlement. This embraced all built development and curtilages. It included

outlying building groups where there was a close physical relationship to the main body of the settlement.

3.26 The objective remained to produce a boundary that would clarify where small-scale windfall development could occur. Caution has been employed to ensure that sites with the potential for delivering larger numbers of houses (5 or more) are generally excluded. Sites of this scale should be considered through the housing site allocation process discussed above, to ensure the full range of impacts can be considered and factored into the planned supply of housing land. Consequently, large areas occupied by farm sheds/yards and caravan sites were generally excluded, because of the extent of area they occupy, but also because of the risk of displacing these uses to less suitable sites and the importance of some of these uses in delivering National Park purposes. Similarly, particularly large areas of landscaped amenity land associated with private dwellings (as opposed to more restricted curtilages and garden areas closely related to the property), were also generally excluded.

3.27 The proposed housing development boundaries are now more expansive than they were. Appendix 18 provides data on the amount of expansion in each settlement[36]. On average, there has been a 29% increase in the area covered by housing development boundaries around settlements.

3.28 It does not necessarily follow that opportunities for windfall housing have increased correspondingly. Many of the areas added to the development boundaries are already in use for business or community purposes that adopted and emerging policies would seek to protect. Similarly, some of the areas in the boundaries are protected in existing and emerging policies as important open space. Nonetheless, it is reasonable to assume that the expansion of boundaries by this degree will afford some additional opportunity for new build windfall housing, as will changes to the settlement hierarchy, which have seen a small increase in the number of large villages compared to the adopted Yorkshire Dales Local Plan.

Small villages

3.29 The new Local Plan proposes to introduce a new source of windfall housing within 30 small villages and hamlets. This would permit scope for a limited number of dwellings on infill sites in settlements where new build housing is generally not permitted under adopted policies.

[36] Where an equivalent boundary exists, so not including settlements in the boundary extension area or those that currently do not have ‘local service centre’ or ‘large village’ status in the 2015-30 Local Plan i.e. Eastby, Fremington, Newbiggin (Bishopdale), Starbotton, Stirton/Thorlby.

Past record of new build windfall delivery

3.30 The long-term average for new build dwellings that have been completed on infill plots stands at 13 units per annum[37]. This includes a number of more exceptional large infill sites[38]. Similar larger business sites like these are included within proposed housing development boundaries and might become available for larger infill schemes during the Local Plan period. Nonetheless, given that these are exceptional cases, a more conservative estimate, based on infill completions on sites of four or less dwellings over the last 22 years, points to potential for 8 additional new build dwellings each year, on infill plots. This is closer to the shorter-term trend over the last 6 years, where infill has resulted in an average of 4 dwelling completions each year, due to a lack of larger infill proposals.

3.31 While infilling has gradually consumed opportunity inside settlements, the 29% expansion in housing development boundaries, together with the wider list of smaller villages where infill may be permissible, should facilitate a continuation of ad-hoc windfall sites. A conservative estimate based on historic trends would be 5 additional dwellings per annum. This does not include any larger infill sites that may come forward.

Specific opportunity for future new-build windfall developments

3.32 The analysis above suggests that there is general potential for small-scale new build infill developments to continue to come forward, based on past delivery and the continuation of a supportive policy environment. It is also possible to be more specific in terms of some of the opportunities that might present themselves. This includes cases where sites that have been promoted for development but have not been shortlisted as site allocations in Stage 2 above, might still be brought forward as windfall developments.

3.33 A number of sites submitted through the call for sites did not align with the Authority's criteria for allocated sites and were rejected during Stage 2A of the HLAA process. These included plots that were either:

- too small to provide at least 5 dwellings (the threshold used to determine candidates for site allocation – see Stage 2 above);
- suggested as part of a larger site, but have subsequently been reduced in scale due to landscape considerations or other constraints (Stage 2 above);
- are in the smaller villages where housing allocations are not appropriate (and capacity for additional new build development is typically more restricted).

[37] Infill completions from 2003/4-2024/25. Excludes infill completions prior to 2019 in the areas designated as National Park in 2016.
[38] 10 units of more, for example, Embsay Tannery, Long Preston Auction Mart, Bainbridge Highways Depot, Guldrey Lane Depot Sedbergh.

3.34 These sites were considered as part of the review of development boundaries prior to Consultation No. 6, rather than as potential site allocations. Since some of these sites had initially been considered as potential site allocations, more information was available regarding constraints, to help inform judgements about possible inclusion within development boundaries.

3.35 In total 38 of these sites were identified by landowners and considered as part of the review of development boundaries, comprising:

- 11 sites that fell within the developed footprint of the settlement and that were automatically included within the development boundary;
- 8 sites that fell outside of the developed footprint of the settlement but were still well-contained by landscape/boundary features with a clearly identifiable extent. These had draft boundaries extended to include them;
- 19 sites that fell outside of the developed footprint and had no definable extent or were otherwise subject to a level of constraint that clearly precluded development. These were excluded from the draft boundary.

3.36 Appendix 19 contains details of all of these potential windfall sites that were specifically considered as part of the initial review of development boundaries, together with confirmation of whether they were included within the draft boundaries included in Consultation No. 6. It also includes an initial assessment of the potential dwelling yield. Not all sites had capacity for development, despite inclusion in a boundary, but 17 were considered to have potential for infill development to take place. These sites were estimated to be capable of **delivering around 41 units of windfall capacity**[39].

3.37 A set of draft development boundaries formed part of Consultation No.6 and accounted for 9% of all public representations received. This included a number of specific comments seeking changes to boundaries, either as factual corrections, or in order to affect windfall development opportunity. Each of these requested amendments were considered by Officers and changes agreed by the Local Plan Advisory Group.

3.38 Appendix 20 sets out a full list of requested changes and an explanation of where boundary changes have and have not been deemed to be necessary. It also includes sites that had already been included within the draft development boundaries and where landowners expressed support for this based on an ambition to develop the plot at some point in the future[40]. Figure 21 overleaf provides a summary of the main changes sought that have a specific implication for windfall capacity from infilling and rounding of settlements.

[39] Includes units delivered through conversion of existing buildings where these form part of the site and are considered worthy of retention.
[40] Excluding those already included in Appendix 19 to avoid double-counting.

Figure 21 – Sites with windfall potential considered in Stages 2B&2C

Site category	Number of sites	Site reference(s)	Outcome	Dwelling yield
Previously considered sites that were rejected as site allocations. Considered for inclusion in development boundaries as an alternative.	6	HOR5 THR3 REE3	All of site suitable for inclusion within development boundary.	12[41]
		GRI1	Part of site for inclusion within development boundary.	2
		EAS1	Site neither suitable for allocation nor inclusion in the development boundary.	-
Previously considered sites where the initial decision to exclude sites from development boundaries was contested by landowners	6	AIR2 GRA.b CAR1 SET.a CRA.c; SET.b	Original decision to exclude from development boundary upheld for all sites	-
Newly submitted sites that were too small to be allocated so fell to be considered as potential infill	12	THO.c THR.a	Site suitable for inclusion in development boundaries	3

[41] Excludes sites that were submitted during the initial call for sites, rejected as potential site allocations prior to Consultation No.6, but included within the development boundaries that formed part of that consultation. Three of these sites were the subject of representations during Consultation No.6 confirming that, notwithstanding their rejection as potential site allocations, landowners remained supportive of their inclusion within development boundaries. These sites were CRA3, GRA4 and NEW2 and their windfall potential had already been included within assumptions above (para 3.34-3.36 and Appendix 19).

sites (all outside of the development boundaries drawn for Consultation No. 6)		AIR.c EWT.a BAR.d FRE.e BAR.e HOR.f CBO.d SED.i CRA.i STA.b	Sites not suitable for inclusion in development boundaries;	-
Newly suggested sites that had already been included within draft development boundaries	3	BAR.f LIN.d BAR.g	Sites already included within development boundary and retained as such.	3
Newly submitted sites initially considered as potential allocations, but subsequently 'downgraded' to be considered as potential windfall site	2	HOR7	Site included in development boundaries	4
		HET2	Site not suitable for inclusion in development boundaries;	-
Site which was suggested as an infill plot speculatively by members of the public	1	CRA.j	Site not suitable for inclusion in development boundaries;	-
			Total	**24**

3.39 For those sites included within development boundaries, this results in an **additional potential dwelling yield of around 24 windfall units**.

3.40 Consultation No. 7 provided a further opportunity to comment on the revised housing development boundaries. This issue accounted for just 2% of the overall response to the consultation, but did generate some further requests to amend the boundaries, either to include or exclude land. These requests are recorded in Appendix 21.

3.41 Two of these additional plots were deemed suitable for inclusion within revised development boundaries and, given the interest expressed by the landowner in releasing the land for infill development, **a further 8 units** can be added to the number of houses that are likely to be realised from these types of new build windfall developments.

3.42 The sum total of potential infill/rounding off windfall sites specifically identified by landowners with an interest in development **stands at around 73 dwellings**. These alone would be capable of providing 4 to 5 dwellings per annum from new build infilling recorded in historic trends (paras 3.30-3.31 above).

3.43 It is important to note that this figure only relates to sites specifically identified by landowners having an interest in developing plots that have been included with the development boundaries plotted. There are likely to be many other potential plots within development boundaries that might be brought forward for development, but that were not flagged during the Local Plan preparation process. Some of these could come forward during the Local Plan period and will supplement the landowner-identified plots above. This suggests that the conservative estimate of 5 additional dwellings per annum from new-build infilling (para 3.30 above) is certainly realistic.

Windfall conclusions

3.44 There is a strong record of windfall development in the National Park. The recent trend is an average of 46 completions per annum. This is consistent with the longer-term trend of 39 per annum, since that figure is based on completions within the smaller National Park area that existed prior to the 2016 boundary extension. Nonetheless, the more conservative figure of 39 per annum will be adopted for the purposes of forecasting future windfall completion.

3.45 The emerging Local Plan policies will continue to support a variety of sources of windfall housing. The evidence suggests that current levels of windfall delivery are likely to be maintained because of additional flexibilities and specific interest expressed in developing sites. The likelihood is, however, that this level of windfall completion will continue to be dominated by the conversion of existing buildings, rather than new build.

STAGES 4 & 5 - ASSESSMENT REVIEW & FINAL EVIDENCE BASE

4.1 The last two stages of the HLAA bring together the information to paint an overall picture of housing land supply. This will help to determine the degree to which the housing supply ambitions of the Local Plan are deliverable.

Overall planned housing land supply

4.2 Based on Stages 1&2 of the assessment, the total planned supply of housing land is currently 669 units made up of:

- 300 units with existing planning permission;
- 369 units from Local Plan site allocations.

4.3 The supply of land from housing allocations makes up only half of the total Local Plan housing target. This assessment has demonstrated however that there has been a comprehensive process over the last three years to invite, identify and evaluate sites, consider new sites and revisit decisions to reject previous sites. The HLAA is evidence that the planned supply of land for housing development in the National Park is unlikely to be increased significantly above the level identified above.

Unplanned housing land supply (windfall)

4.4 To reach the target of 750 new dwellings by 2040 the HLAA has identified a small shortfall of 81 units. Stage 3 of the assessment has however shown that windfall permissions in the National Park consistently provide a source of new housing that will be additional to the planned supply to make up this difference and provide an additional buffer of supply beyond the 750 minimum provision.

Trajectory

4.5 The assessment is expected to provide an indicative trajectory of delivery. This is done broadly by reference to three 5-year intervals across the Local Plan period. To enable this, some broad assumptions have been made for each of the three sources of housing supply:

Extant permissions – estimates of delivery from extant permissions where development is already underway can be made using data from annual monitoring through site visits. Using this information on individual site progress it can be assumed that, for permissions where development has already started, two-thirds will be completed in the first 5 years of the Local Plan period, with the remainder delivered in years 6-10. For those permissions where development has not yet started, delivery is likely to be slower, with the bulk of delivery predicted to fall in years 6-15 of the Plan period.

Site allocations – of the 23 site allocations proposed, 5 have already obtained planning permission or are the subject of current planning applications. It is therefore assumed that these sites (54 dwellings) are capable of being delivered within the first 5 years of the Local Plan period. The remaining sites (315 dwellings) will need to obtain detailed planning permission and will therefore take longer to be completed. These have therefore been divided equally between the remaining two 5-year intervals.

Windfall completions – Although a level of windfall completion equivalent to the historic trend of 39 dwellings per annum seems likely, this will only be achieved once a critical mass of planning permissions has been built up. This is because the time taken from the point of application to the point of completion is typically several years. The assumption then is that a level of windfall completion approaching the historic average of 39 dwellings per year will only be achieved in the second half of the Local Plan period. Years 1-5 are projected to see a level of windfall completion averaging only 12 per annum, with years 6-10 averaging 35. It should still be possible to deliver around 420 dwellings from future windfall completions, an average of 28 per annum spread across the whole Local Plan period.

4.6 An indicative trajectory, based on these assumptions, is provided in Figure 22 below.

Figure 22 – Trajectory of housing delivery (completions)

	Years 1-5	Years 6-10	Years 11-15	Total
Extant planning permissions	122	143	35	300
New site allocations	54	157	158	369
Future windfall supply	62	173	187	422
Total	**238**	**473**	**380**	**1091**

4.7 While there will always be uncertainty regarding the precise level of windfall delivery, given its inherent unpredictability, it is clear that it will provide enough additional housing supply to meet and exceed the target of 750 dwellings by 2040, even if the historic trend of 39 dwellings per annum is not fully sustained.

4.8 The trajectory suggests an over-supply of housing against the target, but some important considerations need to be borne in mind. Firstly, the National Park Authority sought to establish the target of 750 dwellings as a *minimum* to be met from a planned supply of housing land, with windfall providing a facility to both supplement this supply and provide a buffer in the event that the planned supply of land is slower than anticipated.

4.9 Secondly, the cohort of extant planning permissions is dominated by the conversion of traditional buildings, and that is also likely to be the case with future windfall permissions. These conversions contribute numerically to the housing target, but only partially to the Local Plan housing objectives, since conversions are largely predicated on conserving the building rather than housing gain. They are usually not adaptable or affordable homes and tend to be located in less sustainable places remote from day-to-day services.

4.10 Consequently, the supply of allocated sites is needed to deliberately balance new provision towards modern new homes and the more affordable housing in sustainable locations that the future community needs.

Next steps

4.11 This version of the HLAA provides evidence to support the Regulation 22 ‘submission’ stage of the Local Plan. The Local Plan will now be the subject of an independent examination process to determine whether it is sound and can be adopted for the purposes of future decision-making.

4.12 Part of the examination process will include consideration of potential modifications to the Local Plan, if these are required in order to achieve soundness. Depending on the nature of these changes, some further changes or addendums to the HLAA may be required.

4.13 Once adopted, the Local Plan will be subject to monitoring to ensure that an adequate supply of land is maintained to meet the housing target. As part of this monitoring process, the conclusions of the HLAA will be reviewed and updated where necessary.

4.14 The Local Plan Sustainability Appraisal is another part of the evidence base and is informed by the HLAA. The Sustainability Appraisal provides an overarching assessment that demonstrates how the Local Plan has addressed economic, social and environmental objectives, assessing the merits of different policy options and demonstrating that adverse effects can be avoided

or mitigated/compensated. The Sustainability Appraisal will also be submitted as evidence supporting the Local Plan at the Regulation 22 stage.