

From: [REDACTED]
To: [Local Dev Framework](#)
Cc: [REDACTED]
Subject: PDCLP Consultation Response on Behalf of CST - Bolton Abbey Estate
Date: 12 February 2018 15:01:10
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[PDCLP Covering Letter FINAL draft \(WKie\) 12.2.18.pdf](#)
[18.02.12.PDCLP Comments Final JE.docx](#)
[18.02.12.PDCLP Comments Final JE.pdf](#)

Dear [REDACTED],

Further to our ongoing liaison please find attached a copy of our consultation response in respect of the Publication Draft Craven Local Plan.

I have attached a covering letter from the Estate as well as a table of comments in a separate document on the plan.

I have attached the table of comments in both pdf and word versions, as from previous rounds of consultation I appreciate that the word version may help the team to record the comments.

Please let me know if any clarification is required on the comments. We would be grateful to be notified of any other consultation responses as they relate to development at Bolton Abbey and policy EC4a.

I would be grateful if you could confirm safe receipt of these comments.

Best regards,

[REDACTED]

[REDACTED]

Associate Director

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12th February 2018

Our Ref: P&D/Plans/CDC/L Plan/PDCLP/WK

Planning Policy Team
(f.a.o. [REDACTED])
Craven District Council
1 Belle Vue Square
Broughton Road
Skipton BD23 1FJ

By email

Dear Sirs

Publication Draft Craven Local Plan (PDCLP) 2018: Formal response

I am writing on behalf of The Trustees of the Chatsworth Settlement (also known as the Chatsworth Settlement Trustees (CST)) to submit our formal response to the above. As such, I outline related matters herein and attach the related documentation outlined below.

1. Proponent

The Chatsworth Settlement, known internally as the Devonshire Group, owns the land and estates of the Dukedom of Devonshire. Its main estates are in the vicinity of Chatsworth in Derbyshire and Bolton Abbey in North Yorkshire. It also runs visitor and other businesses on these estates, including: hotels; retail and catering outlets; forestry; livestock and arable farming. It employs over 650 full time employees. It is committed to quality in all its activities and takes a responsible approach to development; as such, it measures performance in financial as well as social and environmental terms.

CST's Yorkshire Estate provides 160 full time equivalent jobs at Bolton Abbey, receives 450,000 visitors per year and contributes c.£8m of enabled Gross Value Added to the local economy each year (Source: New Economics Foundation 2014). Its income funds socio-economic facilities (e.g. village shop/post office) and environmental management activities (e.g. architectural conservation) without grant support. CST thereby provides benefits far beyond "just the estate".

However, it has to ensure projects are viable, yet its visitor operation at Bolton Abbey is being diminished by: little secondary spend; seasonal bias; vulnerability to bad weather; no sense of arrival; high maintenance costs; increased competition; major planning constraints; limited visitor accommodation; limited staff accommodation; services at risk; no play areas.

Since 2009 CST has therefore been looking at ways to diversify the "visitor offer" in its Core Visitor Area (CVA from Bolton Bridge to Barden Tower,



including land in both Craven District Council (CDC) and the Yorkshire Dales National Park (YDNP)), gathering related evidence and participating in the preparation of related local plans. As such, CST has engaged extensively with related local planning authorities (LPAs) to provide a policy framework for development over the periods covered by the respective Local Plans (though CST's needs and intended proposals extend beyond these plan periods).

The policy approach included in the PDCLP and particularly draft policy EC4a has therefore been developed in a collaborative way between CST, CDC and other key stakeholders, principally Historic England (HE) and the YDNP Authority (YDNPA) over many years and positively addresses the need for development in that part of the CVA which falls within the CDC plan-area.

A significant amount of resources has therefore been invested by CST and CDC in identifying a policy-based approach to support development at Bolton Abbey, and CST would like to thank CDC for its input in this regard.

2. Response (summary)

CST's response to the PDCLP 2018 as attached can be summarised as follows:

- **STRONG SUPPORT** for the policy approach (Draft Policy EC4/EC4a and settlement hierarchy) to support development at Bolton Abbey
- **STRONG SUPPORT** for the inclusion of Bolton Abbey in Tier 4b of the settlement hierarchy (ie wholly consistent with the approach of the YDNP Local Plan adopted in 2016 with regard to the same)
- **VIEW** that the duty to cooperate (insofar as it relates to this part of the plan area) has been met.
- **SUPPORT** for draft policy EC4 (Tourism) in providing an over-arching tourism policy that supports the multi-faceted parts of the industry
- **SUPPORT** for draft policy EC4's specific spatial reference to supporting tourism development at Bolton Abbey/Bolton Abbey Railway Station
- **STRONG SUPPORT** for draft policy EC4a (Tourism-led development at Bolton Abbey) to address the need to diversify the visitor offer at Bolton Abbey
- **AGREEMENT** with the findings of the Sustainability Appraisal insofar as it considers that policy EC4a (Tourism-Led Development at Bolton Abbey) will have numerous "Major Positive Effects" and "No Negative Effects"
- **VIEW** that policy EC4a is "sound" since it is based on a very strong and robust evidence-based document, the Bolton Abbey Development Options Appraisal Study (BADOAS) 2017 by planning consultants Lichfields, which comprehensively appraised four "strategic development options" for development in the Bolton Abbey CVA and identified a preferred (optimal)



option as “*Composite*” development clustered around both Bolton Abbey village AND Bolton Bridge with some limited development (e.g. small age-specific play areas) throughout the CVA

- **SUPPORT** for the inclusion of a footnote in the PDCLP (p.188) to reference the BADOAS document which provides a detailed justification of the approach taken in draft policy EC4a
- **VIEW** that the policy proposals within the PDCLP meet all four tests of soundness as set out in paragraph 182 of the NPPF
- **VIEW** that the intended development by CST in part of the plan-area (and relating to EC4a) will enhance the area and provide key benefits including:
 - increased public open greenspace
 - attractive focal point to Bolton Abbey village
 - improved amenity
 - enhanced sense of arrival/departure for visitors
 - increased awareness of the former Barnyard area in Bolton Abbey village
 - a much greater choice of high quality/wider choice of accommodation for visitors/staff/others
 - renewable energy supply
 - heritage-themed learning-through-play facilities
 - one of the few wet weather play facility in the Dales area
 - sale of local/organic/estate produce
 - better access to/from Bolton Abbey Station
 - improved road/pedestrian safety
 - homes for young people (e.g. subsidised housing, as is the case for existing staff)
 - office or other work-space units
 - 37 extra full-time equivalent high quality/value jobs.
- **VIEW** that the policy framework in the PDCLP will help deliver many of these benefits in a sustainable way, with the greatest proportion of “hard” development in the CVA taking place in CDC
- **VIEW** that many of these benefits will synergise with those of the Tithe Barn (built c.1520) currently being restored to create a wedding venue that will open later this year
- **VIEW** that the approach of the PDCLP to Bolton Abbey is sound in general terms but that the wording of policies SP4, SP11 and EC4a require minor amendments to ensure the effectiveness of the plan
- **NOTE** that CST has advanced work to inform and underpin the detailed masterplanning process (required by draft policy EC4a) by starting a heritage stone study (as requested by Historic England) to establish the type, quantity, source and cost of stone/slate needed (for related new build and repairs) as well as a feasibility study to establish the exact mix and quantum of related development.




CST, together with RSL and Lichfields, looks forward to attending the examination of the PDCLP to support CDC in relation to draft policy EC4a (Tourism-Led Development at Bolton Abbey) and the inclusion of Bolton Abbey within the settlement hierarchy.

I therefore look forward to hearing from you in due course.

Yours faithfully




MA MSc DipTCP MRTPI
Planning and Development Manager


Enc: Summary Comments and Detailed Comments on Publication Draft
Craven Local Plan (PDCLP) 2018



Summary Comments and Detailed Comments on Publication Draft Craven Local Plan 2018

Please find below comments made by Rural Solutions (RSL) on behalf of Chatsworth Settlement Trustees (CST) (Bolton Abbey Estate) to the Publication Draft Craven Local Plan 2018 (PDCLP) by Craven District Council as the relevant Local Planning Authority (LPA).

It is important that comments on the PDCLP are considered in the context of both CST's previous comments on earlier CDC Local Plan drafts and with regard to the policy framework relating to Bolton Abbey in the Yorkshire Dales National Park Authority's adopted Local Plan 2016.

This document and the comments on the (PDCLP) is therefore set out in the following sections:

Section 1: Summary of comments on the PDCLP

Section 2: A summary of CST's previous comments on earlier Local Plan drafts by CDC

Section 3: An assessment of the policy framework relating to Bolton Abbey in the Yorkshire Dales National Park Authority's adopted Local Plan 2016

Section 4: Detailed comments on content of the PDCLP as it relates specifically to Bolton Abbey (including clarification on minor changes since the Third Pre-Publication Draft Local Plan 2017).

Section 5: Detailed comments on other areas of the PDCLP

Section 6: Comments on the Soundness of the PDCLP (as it relates to the policy approach to Bolton Abbey)

Section 7: Comments relating to the Duty to Co-operate (as it relates to the policy approach to Bolton Abbey)

Section I: Summary of comments on the PDCLP

Local Plan Section / Policy	Comments
GENERAL COMMENTS	<p>CST principally wishes to <u>STRONGLY SUPPORT</u> the policy approach (Draft Policy EC4/EC4a and settlement hierarchy) to supporting development at Bolton Abbey in the PDCLP.</p> <p>By way of context, CST's Yorkshire Estate provides 160 full time equivalent jobs at Bolton Abbey, manages 450,000 visitors per year and contributes c.£8m of enabled Gross Value Added to the local economy each year (Source: New Economics Foundation). It therefore provides social, economic and environmental benefits far beyond "just the estate".</p> <p>However, CST needs to diversify its visitor offer at Bolton Abbey to address various issues, including: little secondary spend; no sense of arrival; vulnerability of operation due to bad weather/school holidays, no play areas, no mid-range visitor accommodation, major planning constraints, increased competition, high maintenance costs, services (eg subsidised post office) at risk.</p> <p>Since 2009 CST has therefore been looking at ways to address these pressing issues in its Core Visitor Area (CVA from Bolton Bridge to Barden Tower, including land in both CDC and the YDNPA), gathering related evidence and participated in the preparation of related local plans. As such, CST has engaged extensively with CDC and the YDNPA to provide a policy framework for development over the periods covered by respective Local Plans (though it should be noted that CST's proposals address a timeframe that runs from the short-term to 20-50 years in the future).</p> <p>The policy approach included in the draft CDCLP and particularly draft policy EC4a has been developed in a collaborative way between CST, CDC and other key stakeholders, principally Historic England (HE) and the YDNPA, over many years and addresses the need for development in that part of the CVA which falls within the CDC plan-area in a positive way.</p> <p>A significant amount of resources has therefore been invested by CST and CDC in identifying a policy-based approach to support development at Bolton Abbey, and CST would like to thank CDC for its input in this regard.</p> <p>Bolton Abbey village (as well as the wider Bolton Abbey CVA) falls partly within the CDC plan-area and partly within the YDNPA plan-area. The policy approach of including the village in the settlement hierarchy of the CDCLP is consistent with the approach taken in the Yorkshire Dales Local Plan adopted on December 20th 2016. CST <u>STRONGLY SUPPORTS</u> the inclusion of Bolton Abbey within Tier 4b of the settlement hierarchy in the PDCLP.</p> <p>CST considers that the approach taken by the draft plan reflects a positive and cogent approach to cross-boundary working in this part of the plan-area. It is very clear that the duty to cooperate (as it relates to this part of the plan area) has been met.</p> <p>CST <u>SUPPORTS</u> draft policy EC4 (TOURISM). In particular, the provision of an over-arching tourism policy that provides support for the multi-faceted parts of the tourism industry is considered to be beneficial. In CST's view it is right that an over-arching tourism policy is</p>

included in the Local Plan, as proposed by CDC. The policy's specific spatial reference to supporting tourism development at Bolton Abbey/Bolton Abbey Railway Station is supported.

CST STRONGLY SUPPORTS draft policy EC4a (TOURISM-LED DEVELOPMENT AT BOLTON ABBEY). For some time now, CST's visitor operation has been diminished by factors including: bad weather; little secondary spend; high maintenance costs; increased competition; major planning constraints; lack of sense of arrival; limited visitor accommodation; limited staff accommodation; services at risk; no play areas. Draft policy EC4a provides the positive policy framework which allows CST to diversify the visitor offer at Bolton Abbey.

CST has reviewed the Sustainability Appraisal of policy EC4a Tourism-Led Development at Bolton Abbey and supports the findings that there will be numerous Major Positive Effects of the policy and no negative effects.

As well as strongly supporting the policy and the sustainability appraisal of it, CST also CONSIDERS the policy to be sound, as qualified in section 6 of this document. The policy approach is based upon a very strong and robust evidence-based document. In particular, the Bolton Abbey Development Options Appraisal Study (BADOAS) 2017 by planning consultants Lichfields for CST appraises four strategic development options for delivering development in the CVA. This appraisal draws on a suite of robust technical evidence documents, as listed later in this representation, and presents an evidenced based piece of work akin to an SEA (Strategic Environmental Assessment). The related appraisal highlights a clear preferred (optimal) option as:

“‘Composite’ development clustered around both Bolton Abbey village AND Bolton Bridge with some limited development (e.g. small age-specific play areas) throughout the CVA.”

The approach taken in the draft PDCLP to development in that part of the CVA within the plan-area aligns with the findings of the BADOAS report and the preferred option outlined above.

CST SUPPORTS the inclusion of a footnote at p.188 of the PDCLP which references the Bolton Abbey Development Options Appraisals Study (BADOAS) document produced on behalf of CST which provides a detailed justification for the approach taken in draft policy EC4a.

The policy proposals incorporated within the PDCLP are considered to meet all four tests of soundness as set out in paragraph 182 of the NPPF.

Development proposed by CST in part of the plan-area covered by the PDCLP can be considered to enhance to the area and provide key benefits including:

- Public open greenspace;
- An attractive focal point to Bolton Abbey village;
- Improved amenity;

- An increased awareness of the former Barnyard area in Bolton Abbey village;
- A much greater choice of high quality accommodation for visitors/staff/others;
- Renewable energy supply;
- An enhanced sense of arrival/departure for visitors;
- Heritage-themed learning-through-play facilities;
- One of the few wet weather play facility in the Dales area;
- Sale of local/organic/estate produce;
- Better access to/from Bolton Abbey Station;
- Improved road safety;
- Homes for young people (e.g. subsidised housing, as is the case for existing staff);
- Office or other work-space units; and,
- 37 extra full-time equivalent high quality/value jobs.

The policy framework in the draft PDCLP will provide a means to deliver many of these benefits in a sustainable way, with the greatest proportion of "hard" development in the CVA taking place in the PDCLP plan-area.

Many of these benefits will synergise with the benefits of the current restoration of the Tithe Barn (built c.1520) to create a wedding venue. The Tithe Barn is a major part of the proposals for Bolton Abbey village and planning consent was granted by the YDNPA for this use in May 2017 and is due to open later this year.

CST considers the approach of the PDCLP to Bolton Abbey is sound in general terms but suggests that the wording of policy SP4, SPI 1 and EC4a require minor amendment in order to ensure the effectiveness of the plan.

CST, together with RSL, looks forward to attending the examination of the draft Local Plan to support CDC in relation to the draft policy EC4a for Tourism-Led Development at Bolton Abbey and the inclusion of Bolton Abbey within the settlement hierarchy.

In the interim, and to allow the prompt delivery of development in due course, CST is advancing work that will inform and underpin the detailed masterplanning process required by draft policy EC4a, including a stone study, as requested by Historic England as an important item, and a feasibility study. The stone study will: establish what type and quality of stone and slate is currently used at Bolton Abbey; what type and quantity of stone/slate is needed for related new build and repairs; where this stone can be sourced from. The feasibility study will consider the exact mix and quantum of development to be taken forward in the Masterplan process (which, as draft policy EC4a notes, is to involve the collaboration of various stakeholders including CDC and Historic England).

Section 2: A summary of CST's previous comments on earlier Local Plan drafts

Comments
<p>CST has actively engaged in the Local Plan production process. A brief summary of its previous comments are provided for reference and clarity.</p> <p>October 2014 Consultation Response – First Pre-Publication Draft Local Plan</p> <p>The response provided:</p> <ul style="list-style-type: none">• Detailed information on the Bolton Abbey Estate and its development needs• Clarification (written and maps) on the extent to which Bolton Abbey village acts as a genuine service village in relation to the southern dales and surrounding area• The changing approach to rural development in national policy and guidance (NPPF para 55/NPPG)• The Yorkshire Dales National Park Authority's recognition of Bolton Abbey as a service village <p>The response requested:</p> <ul style="list-style-type: none">• The amendment of the settlement hierarchy to include Bolton Abbey• An allocation of a 3.5ha site including the central Bolton Abbey Car Park for mixed-use development in the plan• Amendment of specific policy wording in relation to tourism. <p>May 2016 Consultation Response – Second Pre-Publication Draft</p> <p>The response included:</p> <ul style="list-style-type: none">• Detailed information on the Bolton Abbey Estate and its development needs (reiterated from the 2015 consultation response)• Support for the amendment of the spatial strategy to include Bolton Abbey• Confirmation that CST's proposal for the allocation of a large site at the centre of Bolton Abbey (and a site at Bolton Bridge) had been informed by a detailed appraisal and masterplan process.• Concern that neither site was allocated in the Local Plan• Concern that without clear plan-led support the general support for development at Bolton Abbey in the Local Plan could not be realised through the development management process.

The response requested:

- That the CDLP should also contain policy references to the delivery of the above site(s) through a sensitive heritage and landscape based Masterplan, as well as a specific Bolton Abbey related policy

or

- If for any reason it was not possible for the CDLP to contain the foregoing, then it must at least designate the 3.9 ha site in Bolton Abbey village (and also the 1.75 ha site at Bolton Bridge by the A59 roundabout) for mixed use development, together with a specific policy on the delivery of the site(s).

July 2017 Consultation Response – Third Pre-Publication Draft

The response included:

- Strong support for the policy approach (Draft Policy EC4/EC4a and settlement hierarchy) to supporting development at Bolton Abbey in the current consultation draft Local Plan
- An acknowledgement that whilst CST regretted the lack of an allocation at Bolton Abbey, the policy provided a positive framework for development in this location
- Support for the Sustainability Appraisal's conclusions that no reasonable alternatives had been identified to the policy approach to Bolton Abbey
- Proposed amendments to the Council's policy regarding homes on unallocated sites due to lack of clarity regarding acceptability of housing development at Bolton Abbey

As it related to the Council's policy approach to Bolton Abbey (draft Policy EC4/EC4a and settlement hierarchy) the Estate raised no objections and requested no changes to the Local Plan.

Section 3: An assessment of the policy framework relating to Bolton Abbey in the Yorkshire Dales National Park Authority's adopted Local Plan 2016

Comments
<p>It is of relevance to note that CST actively engaged with the Yorkshire Dales National Park Authority (YDNPA) throughout the production of the Yorkshire Dales Local Plan. CST provided consultation responses on all draft versions of the Local Plan and was represented at the examination in public on the Local Plan.</p> <p>The Yorkshire Dales Local Plan was adopted on December 2016. Policy SP3 (Spatial Strategy) includes Bolton Abbey as a Service Village. The Glossary to the Local Plan at p.105 defines a Service Village as 'A settlement that provides a range of services to communities within an immediate area.'</p> <p>As well as including Bolton Abbey as a service village within the plan's settlement hierarchy, the plan also in the justification for policy T5 (Indoor Facilities) states that:</p> <p>'6.35 The busier tourist areas, such as of (sic) Bolton Abbey, Malham, Hawes, Horton, Reeth, Clapham, Aysgarth, Kettlewell and Dent are the most likely locations to receive proposals for further visitor-related development...' (our emphasis).</p> <p>The Yorkshire Dales National Park Local Plan therefore acknowledges both the sustainability of Bolton Abbey as a service village and its importance for tourism.</p> <p>The PDCLP's policy approach of including Bolton Abbey in the settlement hierarchy of the CDCLP and acknowledging its important contribution to tourism in Craven is therefore wholly consistent with the approach taken in the adopted Yorkshire Dales Local Plan. CST STRONGLY SUPPORTS the consistency of this approach.</p>

Section 4: Detailed comments on content of the PDCLP 2018 as it relates specifically to Bolton Abbey (including clarification on minor changes since the Third Pre-Publication Draft Local Plan).

Local Plan Section / Policy	Comments
<p>VISION FOR CRAVEN IN 2032 P.24-26</p>	<p>The relevant section of the vision to Bolton Abbey states that:</p> <p><i>The tourism economy is flourishing, based on the area's rich heritage, cultural and environmental assets, such as the Leeds & Liverpool Canal, the Embsay with Eastby – Bolton Abbey Steam Railway, Bolton Abbey, the Settle-Carlisle Railway, Broughton Hall Estate, Skipton Castle and Woods, the Craven Museum and Gallery and the Yorkshire Dales National Park.</i> (our emphasis)</p> <p>CST is an important contributor to the tourism economy of the area, with 450,000 visitors a year coming to its CVA. Its ongoing liaison with CDC and other organisations reflects its commitment to delivery of an enhanced tourism offer with job growth and economic benefits. Bolton Abbey is situated at an important 'southern gateway' to the Yorkshire Dales National Park which receives c.3.5 million visitors per year and will continue to contribute in an increased way to the tourism economy of the designated area, provided that the draft policy approach (EC4a) to development at Bolton Abbey is maintained moving forward.</p> <p>Whilst CST does not own or operate the Bolton Abbey Steam Railway there is clear linkage between the success of the railway and the provision of enhanced visitor facilities at Bolton Abbey.</p> <p>CST therefore <u>SUPPORTS</u> the vision as it relates to the tourism economy.</p>
<p>SETTLEMENT HIERARCHY P.43-57</p>	<p>Bolton Abbey is identified within the settlement hierarchy in <i>Tier 4b Villages with Basic Services that are bisected by the National Park boundary</i></p> <p>Bolton Abbey fulfils an important service village function for the Southern Dales (particularly Wharfedale and nearby settlements) as a result of the large number of services it offers. The settlement contains an unusually high level of services for a village of its size, in part due to its complimentary roles as both a visitor attraction and a service centre. These services include: post office; bus stop; village hall; shops; toilets used by the public for free but maintained by CST ; church; short stay public car park; tea room; delicatessen; gym/health spa; hotel; pub/bistro; cricket club; farm shop; garage.</p> <p>Significant employment in tourism and other sectors within the village and the Estate office's role as a central 'hub' for the Estate and its workers means that the village is an active one, which as outlined above provides for a relatively high proportion of people who both live and work locally. As noted in the BADOAS 18% of households include at least one employee or former employee based at Bolton Abbey, with many other properties occupied by workers on local farms. This is markedly different to some of Craven's other villages where there is little employment and the major role of the settlement is that of a commuter dormitory.</p>

	<p>As such the village has also been designated as a “service village” in the adopted Yorkshire Dales National Park Local Plan (YDNPLP) as noted at section 3.</p> <p>In view of this and other factors, the inclusion of Bolton Abbey within the CDC Local Plan settlement hierarchy is clearly justified.</p> <p><u>CST STRONGLY SUPPORTS the inclusion of Bolton Abbey within the settlement hierarchy contained within the PDCLP</u></p>
<p>DRAFT POLICY SP4: SPATIAL STRATEGY AND HOUSING GROWTH p.48-52</p>	<p>The policy builds upon the settlement hierarchy which as noted above is supported by CST.</p> <p>The justification for the policy outlines the reasons why no housing developed is allocated to Bolton Abbey (or Long Preston):</p> <p><i>‘4.45 As set out above, Tier 4 settlements comprise villages with basic services (4a) and villages with basic services that are bisected by the YDNP boundary (4b). Overall, a limited level of growth is directed towards Tier 4 settlements, however allocated growth is not directed to Bolton Abbey and Long Preston as Tier 4b settlements for the following reasons:-</i></p> <ul style="list-style-type: none"> • <i>The majority of the built settlement of Long Preston is located within the Yorkshire Dales National Park and no land has been made available to allocate growth in the very small part of the village located in the Craven Plan area;</i> • <i>Bolton Abbey is not to be allocated housing growth in the spatial strategy</i> in view of the significance and sensitivity of its heritage assets.’ (our emphasis) <p>The policy then goes onto provide a distinct criterion relating to development in Tier 4b settlements, which states:</p> <p><i>‘E. Directing limited growth towards Tier 4b settlements (Villages with Basic Services Bisected by the National Park Boundary) to reflect their roles as tourism hubs or gateways on the edge of the Yorkshire Dales National Park;’</i></p> <p>This criterion was not included in the previous draft plan and is SUPPORTED by CST.</p> <p>However, CST has outlined throughout its engagement process with CDC that its proposals for the village <u>do</u> include an element of housing. This is important in terms of providing a mix of uses, strengthening the local community and providing for a sustainable form of development.</p> <p>When Development Management Officers are assessing proposals at Bolton Abbey which are likely to include an element of housing, CST considers it is greatly important that the policy cannot be read (and misunderstood) as presenting a barrier to housing development.</p> <p>CST therefore requests an explanatory addition to the sentence at the end of paragraph 4.45 final bullet point in order that it states (proposed additional wording underlined):</p>

	<p><i>'• Bolton Abbey is not to be allocated housing growth in the spatial strategy in view of the significance and sensitivity of its heritage assets, <u>but some limited housing will be permitted subject to policy EC4a.</u>'</i></p> <p>CST also requests that criterion E of the policy provides clarity on the delivery of the limited growth i.e. delivery through an allocated site in Giggleswick (draft policy SP1 I) and through development on unallocated sites in accordance with criteria H and (in particular) I. This clarity can be providing through the additional wording below (proposed additional wording underlined):</p> <p><i><u>'E. Directing limited growth towards Tier 4b settlements (Villages with Basic Services Bisected by the National Park Boundary) to reflect their roles as tourism hubs or gateways on the edge of the Yorkshire Dales National Park. This growth to be delivered via an allocated site (policy SP1 I) and through unallocated growth that accords with criteria H and I of this policy and policy EC4a.</u></i></p> <p>CST STRONGLY SUPPORTS the inclusion of Bolton Abbey as a Tier 4b in the settlement hierarchy of policy SP4 and welcomes the inclusion of a specific criterion (E) to the policy that relates to development in bisected villages such as Bolton Abbey.</p> <p>However, whilst CST notes and understands CDC's reason for not specifically allocating housing within Bolton Abbey, it must caveat its overall support for the policy on the basis of concerns regarding the effectiveness of the policy if the clarity above regarding housing development is not duly provided. Without that clarity the policy could be misunderstood and misinterpreted by Development Management Officers in so far as it relates to the acceptability of limited housing growth at Bolton Abbey. On that basis there is a risk that the policy may fail to be <i>effective</i> in terms of the intention to support development and include limited housing growth at Bolton Abbey.</p>
<p>DRAFT POLICY EC4: TOURISM p.193-196</p>	<p>CST has 450,000 visitors per annum to its CVA, which acts as a southern gateway for many of the 3.5 million visitors per year to the National Park, and wishes to <u>SUPPORT</u> the introduction of a policy that provides general support for multiple types of tourism development. The tourism sector and economy covers many areas including holiday cottages, day visitor attractions, eating and drinking establishments, countryside access etc., as reflected at Bolton Abbey, and as needed in the interests of rural diversification and regeneration. In CST's view an over-arching tourism policy is needed in the Local Plan, as proposed by CDC.</p> <p>Of particular relevance to Bolton Abbey, the policy states that:</p> <p><i>'Tourism will grow in a sustainable way, so that it helps to improve the economy, environment and quality of life. Such growth will be achieved by:</i> ...</p> <p><i>g) Supporting, in principle, proposals for tourism development and for achieving synergies of co-location, in the following key locations for tourism development identified on the policies map: Bolton Abbey/Bolton Abbey Railway Station" (our emphasis)'</i></p> <p>The wider policy has seen amendments and additions since the second draft pre-publication draft Local Plan although not in a way which has impacted on the above reference.</p>

	<p>CST therefore supports the policy and its reference to Bolton Abbey during the last consultation, only going on to object to the lack of inclusion of any additional more detailed policy guidance relating to Bolton Abbey. This is now addressed by the inclusion of policy EC4a, in the current draft Local Plan.</p> <p>CST <u>SUPPORTS</u> the positively framed tourism policy EC4 as it relates to its interests in, and contribution to, the tourism sector.</p>
<p>DRAFT POLICY EC4A: TOURISM-LED DEVELOPMENT AT BOLTON ABBEY p.196-197</p>	<p>CST <u>STRONGLY SUPPORTS</u> this policy which was first introduced into the draft Local Plan at the third pre-publication draft consultation stage.</p> <p>CST's comments on the second pre-publication draft in 2016 included an objection to the lack of certainty that the plan provided for development at Bolton Abbey. The response dated May 31st 2016 stated:</p> <p><i>'While CST <u>supports</u> draft policies SC4 and EC4 as they relate to the identification of the village as a suitable location to receive development, CST <u>strongly objects</u> to the failure of the Local Plan draft to provide plan led certainty on how this development will be delivered and to identify the Bolton Abbey Village Masterplan site for development.'</i></p> <p>In response CDC introduced policy EC4a in the third pre-publication draft local plan.</p> <p>The policy positively addresses many of the weaknesses and threats identified in the Bolton Abbey Tourism Development Strategy 2014 which followed on from a wider review of the Bolton Abbey operation by CST in 2012. These weaknesses and threats are more comprehensively identified in the BADOAS report (2017) as follows:</p> <p><i>'Weaknesses: lack of sense of arrival (and departure); visitor operation dependent on weather and school holidays; brief trips with little or no secondary spend; major planning constraints limit growth; high maintenance costs; loss-making entities (e.g. Post Office); staff cannot afford local house prices (i.e. long journeys to work); limited visitor accommodation; the CVA therefore has a limited and low value offer to visitors</i></p> <p><i>Threats: wetter summers; limited staff/other accommodation; increased competition; rising costs; planning constraints; listed buildings at risk'</i></p> <p>CST considers that the introduction of the policy (in the draft CDLP 2017 and maintained in the PDCLP 2018) fully responds to the issues raised in the consultation response on the Local Plan in May 2016 and reflects its engagement with CDC since the review of the visitor operation at Bolton Abbey since 2009. The policy wording of CDC has been the subject of input from CST, HE, YDNPA and all organisations are in general agreement in relation to it.</p> <p>An addition to the Publication draft Local Plan is the inclusion of a footnote at p.188 which directly references the BADOAS report:</p> <p><i>'48 A map showing the boundary of the Bolton Abbey Core Visitor Area (CVA) is provided in the Bolton Abbey Development Options Appraisal Study (BADOAS), which has been prepared by the Bolton Abbey Estate in liaison with local and external stakeholders. The CVA extends from</i></p>

Bolton Bridge to Barden Bridge, includes Bolton Abbey Station and is bisected by the boundary of the Yorkshire Dales National Park. That part of the CVA falling within the Craven Local Plan area is shown on the Policies Map (Inset Map No. 24).'

CST SUPPORTS the introduction of this reference in the plan to the BADOAS which forms an integral part of the evidence base for policy EC4a.

CSTs only remaining comment on policy EC4a relates to the reference in the policy that:

'Before any development takes place, a comprehensive strategy and Masterplan for the Core Visitor Area, including detailed development and design principles, shall be produced in collaboration with, and to the satisfaction of, the local planning authority and other key stakeholders, including the Yorkshire Dales National Park Authority, Historic England, Natural England and the Environment Agency.'

It is CST's view that the requirement to seek 'the satisfaction' (difficult to measure) of five different authorities could ultimately act as a constraint to the delivery of the development which the policy seeks to facilitate, especially given that the need for such development is now pressing.

CST acknowledges the importance of collaboration with all of the stakeholders listed. However in order to ensure the effectiveness of the policy suggests that the policy is reworded to refer to 'the satisfaction' of the local planning authority (Craven District Council) only. The satisfaction of CDC as the LPA can of course be measured based on the input and feedback of the key stakeholders listed (ie CDC would seek the views of other stakeholders before deeming it was satisfied accordingly). As such, an amendment would not dilute the approach proposed by CDC but simply make the policy more effective; it would also make it far simpler for a Development Management Officer assessing a development proposal to come to a clear conclusion regarding the extent to which the policy has been complied with.

We therefore recommend that the above wording is amended to state:

*'Before any development takes place, a comprehensive strategy and Masterplan for the Core Visitor Area, including detailed development and design principles, shall be produced **to the satisfaction of the local planning authority in collaboration with key stakeholders**, including the Yorkshire Dales National Park Authority, Historic England, Natural England and the Environment Agency.'* (our emphasis)

CST is currently advancing work that will inform and underpin the detailed masterplanning process required by this draft policy EC4a, including a stone study and feasibility study. The stone study, as requested by Historic England as an important item, will establish: the type and quality of stone and slate used at Bolton Abbey; the type and quantum of stone and slate needed for related new build and repairs; where such stone and slate can be sourced from. The feasibility study will establish the exact mix and quantum of development to be taken forward in the Masterplan process, which as draft policy EC4a notes, is to involve the collaboration of various stakeholders (including CDC and Historic England).

<p>SUSTAINABILITY OF DRAFT POLICY EC4A: TOURISM –LED DEVELOPMENT AT BOLTON ABBEY</p>	<p>CST wishes to SUPPORT the findings of the sustainability assessment (SA) of policy EC4a.</p> <p>The SA notes:</p> <p><i>'Reasonable Alternatives: None identified'</i></p> <p>CST would concur that in policy (rather than allocation) terms there is no reasonable alternative to the approach taken by CDC in introducing EC4a to guide and support new development at the Estate.</p> <p>The BADOAS report considered four options for development in the Bolton Abbey CVA and identified that only the option of <i>"Composite" development clustered around both Bolton Abbey village AND Bolton Bridge with some limited development (e.g. small age-specific play areas) throughout the CVA</i> provided a realistic option to meet the area's development needs whilst also respecting and enhancing the sensitive nature of the historic environment there. The draft policy reflects, and will facilitate, the delivery of the part of the option relating to the Craven plan-area.</p> <p>The SA finds no negative impacts of the policy when assessed against the Strategic Objectives of the plan. Only <i>'Major positive effects'</i>, <i>'Minor positive effects'</i> or <i>'Neutral effect or no relationship identified'</i> are noted.</p> <p>In particular, numerous <i>'Major Positive Effects'</i> are considered to occur when the policy is assessed against the following draft Strategic Objectives:</p> <p><i>"SO1) Maximise employment opportunities within Craven</i> <i>SO2) Maximise opportunities for economic and business growth</i> <i>SO3) Promote equality and diversity, and foster community cohesion by reducing all forms of poverty</i> <i>SO1 2) Conserve and where appropriate enhance the historic environment including heritage assets and their settings and areas of identified and potential archaeological interest"</i></p> <p>The SA of Policy EC4a provides a robust validation of the policy introduced by CDC.</p>
<p>PROPOSALS MAP FOR BOLTON ABBEY</p>	<p>CST <u>SUPPORTS</u> the draft proposals map for Bolton Abbey (as shown at Fig.1 below).</p> <p>CST notes that the proposals map identifies the part of its Core Visitor Area (CVA) within the Craven Local Plan area with the legend <i>'Core Visitor Area (Tourism-Led, Mixed-Use Development Opportunity Site at Bolton Abbey) EC4a'</i>. CST notes that the area of its CVA which</p>

sits within the National Park has been taken off the map (at the request of the YDNPA). CST considers that the greater clarity provided by the proposals map is to be welcomed, but has no major comment on the change.

The proposals map identifies:

General locations for development within the Core Visitor Area at Bolton Abbey EC4a

These locations are referred to in policy EC4a as:

- *Land including and surrounding the main village car park at Bolton Abbey village*
- *Land to the north-north-west of the B6160 / A59 roundabout at Bolton Bridge*
- *Land north of the highway spur (part of former A59) to the west of the B6160 at Bolton Bridge*

The proposals map provides clarity on locations for development incorporated in the policy and is supported as such.

INSET MAP No. 24: BOLTON ABBEY (1:23,000)

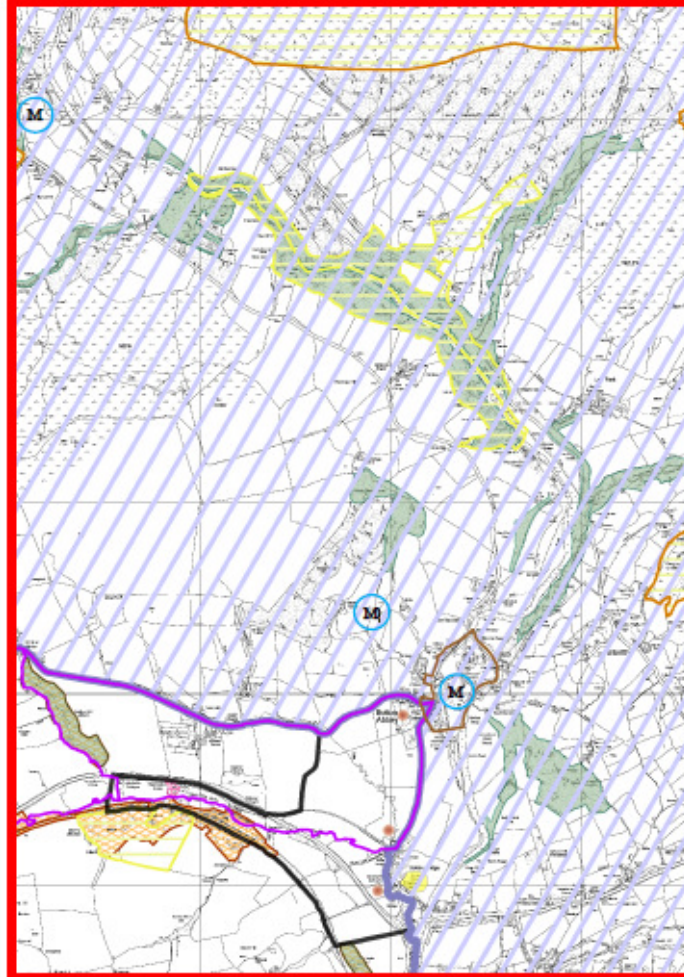


Fig 1. Draft proposals map for Bolton Abbey

Section 5: Detailed comments on other areas of the PDCLP

Local Plan Section / Policy	Comments
<p>DRAFT POLICY SP11: STRATEGY FOR TIER 4A AND 4B VILLAGES WITH BASIC SERVICES AND BISECTED VILLAGES WITH BASIC SERVICES</p>	<p>Whilst supporting the identification of Bolton Abbey as a 4B Settlement, CST notes that the wording of this policy is somewhat misleading.</p> <p>The opening to the policy states that:</p> <p><i>'Tier 4 settlements will receive a limited amount of growth that underpins their role and function as settlements with basic services and to ensure ongoing sustainability. Villages with basic services and/or tourism function which are bisected by the National Park boundary also receive an appropriate level of growth on the following sites:' (our emphasis)</i></p> <p>The policy then goes onto list four sites for allocation. The wording highlighted in bold above would suggest that all of the sites listed are to be found in villages bisected by the National Park boundary. That is not the case and only of the four allocated sites is in a village bisected by the National Park boundary (Giggleswick). The other three sites are in 4A villages, not 4B (bisected villages).</p> <p>Whilst the policy may be incorrectly worded in this regard, CST is concerned that the policy as worded could also cause confusion at the development management stage. The policy as worded could be incorrectly interpreted in isolation as only allowing development in 4A and 4B villages on the named allocated sites. Policy SP4 criterion H supports development on previously developed sites in the main built up area of settlements in Tier 1 – 4A/B settlements, whilst criterion I of that policy supports the release of non-allocated sites adjoining the main built up area, subject to compliance with one of three listed sub-criteria including:</p> <p><i>'c) development is justified by special economic, environmental and /or social circumstances,'</i></p> <p>It is strongly recommended that the policy wording highlighted above is amended for clarity to read:</p> <p><i>'Tier 4 settlements (including villages with basic services and/or tourism function which are bisected by the National Park boundary) will receive a limited amount of growth that underpins their role and function as settlements with basic services and to ensure ongoing sustainability. An appropriate level of growth will be delivered on the following allocated sites (in addition to development on non-allocated sites that conform to policy SP4 criteria)...'</i></p> <p>This change will make the plan more legible and effective.</p>

DRAFT POLICY EC3: RURAL ECONOMY

The policy states in relation to the rural economy that:

Craven's rural economy will be supported, so that it may grow and diversify in a sustainable way to provide long term economic, environmental and social benefits for local communities. This will be achieved in the following ways:

(non-relevant bullet points omitted)

c) Helping **existing and new** rural businesses, **including tourism related businesses** to succeed, grow and expand, by working with them co-operatively and proactively, so that development proposals can be supported wherever possible; (text in bolds is that which has been amended or added to the policy in the current draft).

CST SUPPORTS the inclusion of the highlighted text which provides further recognition of the benefits of tourism (and its diversification) to the rural economy of Craven.

INSET MAP No. 20: EMBSAY
WITH EASTBY

CST owns land to the south of Shires Lane and east of the cricket field, Embsay.

The land received planning consent in 2016 at appeal for housing development.

CST SUPPORTS the identification of the land concerned as an Existing Housing Commitment on the proposals map for Embsay.

Section 6: Comments on the Soundness of the PDCLP (as it relates to the policy approach to Bolton Abbey)

Local Plan Section / Policy	Comments
Whole plan (as it relates to Bolton Abbey)	<p>As well as <u>STRONGLY SUPPORTING</u> draft policy EC4a, CST <u>CONSIDERS</u> the policy (and the approach of the CDCLP to delivering development at Bolton Abbey) is sound.</p> <p>In relation to the tests of soundness incorporated in the NPPF at paragraph 182 we note as follows:</p>
	<p><i>“● Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;”</i></p> <p>The policy and approach to delivering development at Bolton Abbey has been positively prepared following years of engagement between CST and CDC (and the YDNPA as neighbouring planning authority) following an internal review of the Bolton Abbey visitor operation since 2009. The development and management requirements of Bolton Abbey have been assessed via numerous surveys and assessments which have been produced and shared with CDC and other stakeholders. These include:</p> <ol style="list-style-type: none"> 1. The Bolton Abbey Heritage Capacity Assessment (by FAS) 2. The Bolton Abbey Landscape Capacity Assessment (by Gillespies) 3. The Bolton Abbey Transport Statement (by Arup) 4. The Bolton Abbey village Masterplan (by CST) 5. The Bolton Abbey Visitor Accommodation Needs Assessment (by Frey Consulting) 6. The Bolton Abbey Staff Accommodation Needs Assessment (by Frey Consulting) 7. The Bolton Abbey Ecological Statement (by BLE) 8. The Preliminary Bolton Abbey Heritage Assessment (by ArcHeritage) 9. The Preliminary Bolton Abbey Landscape Appraisal (by Gillespies) 10. The Bolton Abbey Estate Tourism Development Strategy (by CST) 11. Bolton Abbey Heritage Landscape Management Plan (by English Nature et al). <p>Furthermore, all of these documents have informed the BADOAS document by Lichfields (2017), and some have informed the earlier Bolton Abbey Village Masterplan 2015 by Rural Solutions.</p>
	<p><i>● Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;</i></p> <p>CDC has been presented with various strategies for delivering development at Bolton Abbey including a large site allocation. It has determined that a specific policy based route is the most appropriate route. Liaison with CDC has also led to CST: increasing the number</p>

	<p>of strategic development options considered; reducing the scale of its development aspirations; adjusting the proposed layout so as to respect medieval features; increasing the amount of planting to screen development from sensitive views (including some in the YDNP).</p> <p>The SA of the policy by CDC has identified no reasonable alternatives. This is the view also of the BADOAS report which considered four development options and found only one realistic option to accommodate development.</p> <p>CST considers that CDC has justified why the policy based approach outlined in EC4a is the most appropriate strategy for delivering development at Bolton Abbey.</p>
	<ul style="list-style-type: none"> ● <i>Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities;</i> <p>Proposals for delivering development at Bolton Abbey have been brought forward via an indicative Development Masterplan which has formed the basis of discussion with CDC, YDNPA, HE and other organisations. The policy wording incorporated within EC4a has been the subject of informal consultation with CST, YDNPA and HE prior to its inclusion for public comment. The policy wording is broadly or entirely supported by all consulted and it therefore presents an effective framework for the delivery of development over the plan-period.</p> <p>Furthermore, the BADOAS includes a specific section (eight) on how development will be delivered in the CVA in terms of Design, Delivery Mechanisms, and Phasing, thus demonstrating the effectiveness of the policy.</p> <p>The SA of the policy identifies that the policy will be effective when considered against a number of objectives of the CDCLP.</p> <p>CST considers that the general policy approach to development at Bolton Abbey is sound but considers that amendment to the wording of policies SP4 and SP11 is required, as set out in this response, in order to make it clear that some housing development will be acceptable as part of the development to take place in this location.</p>
	<ul style="list-style-type: none"> ● <i>Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</i> <p>The policy approach to BA is considered to accord with national policy. It is positively framed and gives importance to tourism development, the rural economy and protection of heritage and environmental assets, all of which are given importance in the Framework. Both CDC and HE have accepted that heritage, as confirmed by the NPPF, is only one factor in providing for sustainable development and the policy reflects this balance. The SA of the policy notes that there will be Major Positive Effects in terms of heritage interests in Bolton Abbey.</p>

Section 7: Comments relating to the Duty to Co-operate (as it relates to the policy approach to Bolton Abbey)

Local Plan Section / Policy	Comments
<p>Whole plan (as it relates to Bolton Abbey)</p>	<p>CST considers that the approach taken by the PDCLP reflects a positive and cogent approach to cross-boundary working in this part of the plan-area. It is very clear that the duty to cooperate (as it relates to this part of the plan area) has been met.</p> <p>CST has attended numerous meetings at which representatives of both CDC and the YDNPA were present, to discuss the policy approach to Bolton Abbey.</p> <p>CST supports CDC for including Bolton Abbey in the Local Plan's settlement hierarchy in line with the inclusion of the settlement as a service village in the adopted Yorkshire Dales Local Plan.</p> <p>In relation to policy EC4a CDC has fully consulted with and considered the views of the YDNPA in creating this policy and it is noted that the policy requires a masterplan to be produced in collaboration with the YDNPA as a 'key stakeholder'.</p> <p>CST comments on the duty to co-operate only in so far as it relates to Bolton Abbey - and in doing so considers that CDC has fully discharged its duty.</p>

CDC NOTE: The following comments are a repetition of the comments above. Originally, they were provided in an alternative file format (Word).

Summary Comments and Detailed Comments on Publication Draft Craven Local Plan 2018

Please find below comments made by Rural Solutions (RSL) on behalf of Chatsworth Settlement Trustees (CST) (Bolton Abbey Estate) to the Publication Draft Craven Local Plan 2018 (PDCLP) by Craven District Council as the relevant Local Planning Authority (LPA).

It is important that comments on the PDCLP are considered in the context of both CST's previous comments on earlier CDC Local Plan drafts and with regard to the policy framework relating to Bolton Abbey in the Yorkshire Dales National Park Authority's adopted Local Plan 2016.

This document and the comments on the (PDCLP) is therefore set out in the following sections:

Section 1: Summary of comments on the PDCLP

Section 2: A summary of CST's previous comments on earlier Local Plan drafts by CDC

Section 3: An assessment of the policy framework relating to Bolton Abbey in the Yorkshire Dales National Park Authority's adopted Local Plan 2016

Section 4: Detailed comments on content of the PDCLP as it relates specifically to Bolton Abbey (including clarification on minor changes since the Third Pre-Publication Draft Local Plan 2017).

Section 5: Detailed comments on other areas of the PDCLP

Section 6: Comments on the Soundness of the PDCLP (as it relates to the policy approach to Bolton Abbey)

Section 7: Comments relating to the Duty to Co-operate (as it relates to the policy approach to Bolton Abbey)

Section 1: Summary of comments on the PDCLP

Local Plan Section / Policy	Comments
GENERAL COMMENTS	<p>CST principally wishes to <u>STRONGLY SUPPORT</u> the policy approach (Draft Policy EC4/EC4a and settlement hierarchy) to supporting development at Bolton Abbey in the PDCLP.</p> <p>By way of context, CST's Yorkshire Estate provides 160 full time equivalent jobs at Bolton Abbey, manages 450,000 visitors per year and contributes c.£8m of enabled Gross Value Added to the local economy each year (Source: New Economics Foundation). It therefore provides social, economic and environmental benefits far beyond "just the estate".</p> <p>However, CST needs to diversify its visitor offer at Bolton Abbey to address various issues, including: little secondary spend; no sense of arrival; vulnerability of operation due to bad weather/school holidays, no play areas, no mid-range visitor accommodation, major planning constraints, increased competition, high maintenance costs, services (eg subsidised post office) at risk.</p> <p>Since 2009 CST has therefore been looking at ways to address these pressing issues in its Core Visitor Area (CVA from Bolton Bridge to Barden Tower, including land in both CDC and the YDNP), gathering related evidence and participated in the preparation of related local plans. As such, CST has engaged extensively with CDC and the YDNPA to provide a policy framework for development over the periods covered by respective Local Plans (though it should be noted that CST's proposals address a timeframe that runs from the short-term to 20-50 years in the future).</p> <p>The policy approach included in the draft CDCLP and particularly draft policy EC4a has been developed in a collaborative way between CST, CDC and other key stakeholders, principally Historic England (HE) and the YDNPA, over many years and addresses the need for development in that part of the CVA which falls within the CDC plan-area in a positive way.</p> <p>A significant amount of resources has therefore been invested by CST and CDC in identifying a policy-based approach to support development at Bolton Abbey, and CST would like to thank CDC for its input in this</p>

	<p>regard.</p> <p>Bolton Abbey village (as well as the wider Bolton Abbey CVA) falls partly within the CDC plan-area and partly within the YDNPA plan-area. The policy approach of including the village in the settlement hierarchy of the CDCLP is consistent with the approach taken in the Yorkshire Dales Local Plan adopted on December 20th 2016. CST <u>STRONGLY SUPPORTS</u> the inclusion of Bolton Abbey within Tier 4b of the settlement hierarchy in the PDCLP.</p> <p>CST considers that the approach taken by the draft plan reflects a positive and cogent approach to cross-boundary working in this part of the plan-area. It is very clear that the duty to cooperate (as it relates to this part of the plan area) has been met.</p> <p>CST <u>SUPPORTS</u> draft policy EC4 (TOURISM). In particular, the provision of an over-arching tourism policy that provides support for the multi-faceted parts of the tourism industry is considered to be beneficial. In CST's view it is right that an over-arching tourism policy is included in the Local Plan, as proposed by CDC. The policy's specific spatial reference to supporting tourism development at Bolton Abbey/Bolton Abbey Railway Station is supported.</p> <p>CST <u>STRONGLY SUPPORTS</u> draft policy EC4a (TOURISM-LED DEVELOPMENT AT BOLTON ABBEY). For some time now, CST's visitor operation has been diminished by factors including: bad weather; little secondary spend; high maintenance costs; increased competition; major planning constraints; lack of sense of arrival; limited visitor accommodation; limited staff accommodation; services at risk; no play areas. Draft policy EC4a provides the positive policy framework which allows CST to diversify the visitor offer at Bolton Abbey.</p> <p>CST has reviewed the Sustainability Appraisal of policy EC4a Tourism-Led Development at Bolton Abbey and supports the findings that there will be numerous Major Positive Effects of the policy and no negative effects.</p> <p>As well as strongly supporting the policy and the sustainability appraisal of it, CST also <u>CONSIDERS</u> the policy to be sound, as qualified in section 6 of this document. The policy approach is based upon a very strong and robust evidence-based document. In particular, the Bolton Abbey Development Options Appraisal Study (BADOAS) 2017 by planning consultants Lichfields for CST appraises four strategic development options for delivering development in the CVA. This appraisal draws on a suite of robust technical evidence documents, as listed later in this representation, and presents an evidenced based piece of work akin to an SEA (Strategic Environmental Assessment). The related appraisal highlights a clear preferred (optimal) option as:</p>
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“‘Composite’ development clustered around both Bolton Abbey village AND Bolton Bridge with some limited development (e.g. small age-specific play areas) throughout the CVA.”

The approach taken in the draft PDCLP to development in that part of the CVA within the plan-area aligns with the findings of the BADOAS report and the preferred option outlined above.

CST SUPPORTS the inclusion of a footnote at p.188 of the PDCLP which references the Bolton Abbey Development Options Appraisals Study (BADOAS) document produced on behalf of CST which provides a detailed justification for the approach taken in draft policy EC4a.

The policy proposals incorporated within the PDCLP are considered to meet all four tests of soundness as set out in paragraph 182 of the NPPF.

Development proposed by CST in part of the plan-area covered by the PDCLP can be considered to enhance to the area and provide key benefits including:

- Public open greenspace;
- An attractive focal point to Bolton Abbey village;
- Improved amenity;
- An increased awareness of the former Barnyard area in Bolton Abbey village;
- A much greater choice of high quality accommodation for visitors/staff/others;
- Renewable energy supply;
- An enhanced sense of arrival/departure for visitors;
- Heritage-themed learning-through-play facilities;
- One of the few wet weather play facility in the Dales area;
- Sale of local/organic/estate produce;
- Better access to/from Bolton Abbey Station;
- Improved road safety;
- Homes for young people (e.g. subsidised housing, as is the case for existing staff);
- Office or other work-space units; and,
- 37 extra full-time equivalent high quality/value jobs.

The policy framework in the draft PDCLP will provide a means to deliver many of these benefits in a sustainable way, with the greatest proportion of “hard” development in the CVA taking place in the PDCLP plan-area.

Many of these benefits will synergise with the benefits of the current restoration of the Tithe Barn (built c.1520)

	<p>to create a wedding venue. The Tithe Barn is a major part of the proposals for Bolton Abbey village and planning consent was granted by the YDNPA for this use in May 2017 and is due to open later this year.</p> <p>CST considers the approach of the PDCLP to Bolton Abbey is sound in general terms but suggests that the wording of policy SP4, SP11 and EC4a require minor amendment in order to ensure the effectiveness of the plan.</p> <p>CST, together with RSL, looks forward to attending the examination of the draft Local Plan to support CDC in relation to the draft policy EC4a for Tourism-Led Development at Bolton Abbey and the inclusion of Bolton Abbey within the settlement hierarchy.</p> <p>In the interim, and to allow the prompt delivery of development in due course, CST is advancing work that will inform and underpin the detailed masterplanning process required by draft policy EC4a, including a stone study, as requested by Historic England as an important item, and a feasibility study. The stone study will: establish what type and quality of stone and slate is currently used at Bolton Abbey; what type and quantity of stone/slate is needed for related new build and repairs; where this stone can be sourced from. The feasibility study will consider the exact mix and quantum of development to be taken forward in the Masterplan process (which, as draft policy EC4a notes, is to involve the collaboration of various stakeholders including CDC and Historic England).</p>
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Section 2: A summary of CST’s previous comments on earlier Local Plan drafts

<p>Comments</p>
<p>CST has actively engaged in the Local Plan production process. A brief summary of its previous comments are provided for reference and clarity.</p> <p>October 2014 Consultation Response – First Pre-Publication Draft Local Plan</p> <p>The response provided:</p> <ul style="list-style-type: none"> · Detailed information on the Bolton Abbey Estate and its development needs

- Clarification (written and maps) on the extent to which Bolton Abbey village acts as a genuine service village in relation to the southern dales and surrounding area
- The changing approach to rural development in national policy and guidance (NPPF para 55/NPPG)
- The Yorkshire Dales National Park Authority's recognition of Bolton Abbey as a service village

The response requested:

- The amendment of the settlement hierarchy to include Bolton Abbey
- An allocation of a 3.5ha site including the central Bolton Abbey Car Park for mixed-use development in the plan
- Amendment of specific policy wording in relation to tourism.

May 2016 Consultation Response – Second Pre-Publication Draft

The response included:

- Detailed information on the Bolton Abbey Estate and its development needs (reiterated from the 2015 consultation response)
- Support for the amendment of the spatial strategy to include Bolton Abbey
- Confirmation that CST's proposal for the allocation of a large site at the centre of Bolton Abbey (and a site at Bolton Bridge) had been informed by a detailed appraisal and masterplan process.
- Concern that neither site was allocated in the Local Plan
- Concern that without clear plan-led support the general support for development at Bolton Abbey in the Local Plan could not be realised through the development management process.

The response requested:

- That the CDLP should also contain policy references to the delivery of the above site(s) through a sensitive heritage and landscape based Masterplan, as well as a specific Bolton Abbey related policy

or

- If for any reason it was not possible for the CDLP to contain the foregoing, then it must at least designate the 3.9 ha site in Bolton Abbey

village (and also the 1.75 ha site at Bolton Bridge by the A59 roundabout) for mixed use development, together with a specific policy on the delivery of the site(s).

July 2017 Consultation Response – Third Pre-Publication Draft

The response included:

- Strong support for the policy approach (Draft Policy EC4/EC4a and settlement hierarchy) to supporting development at Bolton Abbey in the current consultation draft Local Plan
- An acknowledgement that whilst CST regretted the lack of an allocation at Bolton Abbey, the policy provided a positive framework for development in this location
- Support for the Sustainability Appraisal's conclusions that no reasonable alternatives had been identified to the policy approach to Bolton Abbey
- Proposed amendments to the Council's policy regarding homes on unallocated sites due to lack of clarity regarding acceptability of housing development at Bolton Abbey

As it related to the Council's policy approach to Bolton Abbey (draft Policy EC4/EC4a and settlement hierarchy) the Estate raised no objections and requested no changes to the Local Plan.

Section 3: An assessment of the policy framework relating to Bolton Abbey in the Yorkshire Dales National Park Authority's adopted Local Plan 2016

Comments

It is of relevance to note that CST actively engaged with the Yorkshire Dales National Park Authority (YDNPA) throughout the production of the Yorkshire Dales Local Plan. CST provided consultation responses on all draft versions of the Local Plan and was represented at the examination in public on the Local Plan.

The Yorkshire Dales Local Plan was adopted on December 2016. Policy SP3 (Spatial Strategy) includes Bolton Abbey as a Service Village. The Glossary to the Local Plan at p.105 defines a Service Village as 'A settlement that provides a range of services to communities within an immediate area.'

As well as including Bolton Abbey as a service village within the plan's settlement hierarchy, the plan also in the justification for policy T5 (Indoor Facilities) states that:

'6.35 The busier tourist areas, such as of (sic) Bolton Abbey, Malham, Hawes, Horton, Reeth, Clapham, Aysgarth, Kettlewell and Dent are the most likely locations to receive proposals for further visitor-related development...' (our emphasis).

The Yorkshire Dales National Park Local Plan therefore acknowledges both the sustainability of Bolton Abbey as a service village and its importance for tourism.

The PDCLP's policy approach of including Bolton Abbey in the settlement hierarchy of the CDCLP and acknowledging its important contribution to tourism in Craven is therefore wholly consistent with the approach taken in the adopted Yorkshire Dales Local Plan. CST STRONGLY SUPPORTS the consistency of this approach.

Section 4: Detailed comments on content of the PDCLP 2018 as it relates specifically to Bolton Abbey (including clarification on minor changes since the Third Pre-Publication Draft Local Plan).

Local Plan Section / Policy	Comments
<p>VISION FOR CRAVEN IN 2032 P.24-26</p>	<p>The relevant section of the vision to Bolton Abbey states that:</p> <p><i>'The tourism economy is flourishing, based on the area's rich heritage, cultural and environmental assets, such as the Leeds & Liverpool Canal, the Embsay with Eastby – Bolton Abbey Steam Railway, Bolton Abbey, the Settle-Carlisle Railway, Broughton Hall Estate, Skipton Castle and Woods, the Craven Museum and Gallery and the Yorkshire Dales National Park.'</i> (our emphasis)</p> <p>CST is an important contributor to the tourism economy of the area, with 450,000 visitors a year coming to its CVA. Its ongoing liaison with CDC and other organisations reflects its commitment to delivery of an enhanced tourism offer with job growth and economic benefits. Bolton Abbey is situated at an important 'southern gateway' to the Yorkshire Dales National Park which receives c.3.5 million visitors per year and will continue to contribute in an increased way to the tourism economy of the designated area, provided that the draft policy approach (EC4a) to development at Bolton Abbey is maintained moving forward.</p> <p>Whilst CST does not own or operate the Bolton Abbey Steam Railway there is clear linkage between the success of the railway and the provision of enhanced visitor facilities at Bolton Abbey.</p> <p>CST therefore <u>SUPPORTS</u> the vision as it relates to the tourism economy.</p>
<p>SETTLEMENT HIERARCHY P.43-57</p>	<p>Bolton Abbey is identified within the settlement hierarchy in <i>Tier 4b Villages with Basic Services that are bisected by the National Park boundary</i></p>

	<p>Bolton Abbey fulfils an important service village function for the Southern Dales (particularly Wharfedale and nearby settlements) as a result of the large number of services it offers. The settlement contains an unusually high level of services for a village of its size, in part due to its complimentary roles as both a visitor attraction and a service centre. These services include: post office; bus stop; village hall; shops; toilets used by the public for free but maintained by CST ; church; short stay public car park; tea room; delicatessen; gym/health spa; hotel; pub/bistro; cricket club; farm shop; garage.</p> <p>Significant employment in tourism and other sectors within the village and the Estate office's role as a central 'hub' for the Estate and its workers means that the village is an active one, which as outlined above provides for a relatively high proportion of people who both live and work locally. As noted in the BADOAS 18% of households include at least one employee or former employee based at Bolton Abbey, with many other properties occupied by workers on local farms. This is markedly different to some of Craven's other villages where there is little employment and the major role of the settlement is that of a commuter dormitory.</p> <p>As such the village has also been designated as a "service village" in the adopted Yorkshire Dales National Park Local Plan (YDNPLP) as noted at section 3.</p> <p>In view of this and other factors, the inclusion of Bolton Abbey within the CDC Local Plan settlement hierarchy is clearly justified.</p> <p><u>CST STRONGLY SUPPORTS the inclusion of Bolton Abbey within the settlement hierarchy contained within the PDCLP</u></p>
<p>DRAFT POLICY SP4: SPATIAL STRATEGY AND HOUSING GROWTH p.48-52</p>	<p>The policy builds upon the settlement hierarchy which as noted above is supported by CST.</p> <p>The justification for the policy outlines the reasons why no housing developed is allocated to Bolton Abbey (or Long Preston):</p> <p><i>'4.45 As set out above, Tier 4 settlements comprise villages with basic services (4a) and villages with basic services that are bisected by the YDNP boundary (4b). Overall, a limited level of growth is directed towards Tier 4 settlements, however allocated growth is not directed to Bolton Abbey and Long Preston as Tier 4b settlements for the following reasons:-</i></p> <ul style="list-style-type: none"> <i>• The majority of the built settlement of Long Preston is located within the Yorkshire Dales National Park and no land has been made available to allocate growth in the very small part of the village located in the Craven</i>

Plan area;

• **Bolton Abbey is not to be allocated housing growth in the spatial strategy** in view of the significance and sensitivity of its heritage assets.’ (our emphasis)

The policy then goes onto provide a distinct criterion relating to development in Tier 4b settlements, which states:

‘E. Directing limited growth towards Tier 4b settlements (Villages with Basic Services Bisected by the National Park Boundary) to reflect their roles as tourism hubs or gateways on the edge of the Yorkshire Dales National Park;’

This criterion was not included in the previous draft plan and is SUPPORTED by CST.

However, CST has outlined throughout its engagement process with CDC that its proposals for the village do include an element of housing. This is important in terms of providing a mix of uses, strengthening the local community and providing for a sustainable form of development.

When Development Management Officers are assessing proposals at Bolton Abbey which are likely to include an element of housing, CST considers it is greatly important that the policy cannot be read (and misunderstood) as presenting a barrier to housing development.

CST therefore requests an explanatory addition to the sentence at the end of paragraph 4.45 final bullet point in order that it states (proposed additional wording underlined):

• *Bolton Abbey is not to be allocated housing growth in the spatial strategy in view of the significance and sensitivity of its heritage assets, but some limited housing will be permitted subject to policy EC4a.*

CST also requests that criterion E of the policy provides clarity on the delivery of the limited growth i.e. delivery through an allocated site in Giggleswick (draft policy SP11) and through development on unallocated sites in accordance with criteria H and (in particular) I. This clarity can be providing through the additional wording below (proposed additional wording underlined):

‘E. Directing limited growth towards Tier 4b settlements (Villages with Basic Services Bisected by the National Park Boundary) to reflect their roles as tourism hubs or gateways on the edge of the Yorkshire Dales National

	<p><u>Park. This growth to be delivered via an allocated site (policy SP11) and through unallocated growth that accords with criteria H and I of this policy and policy EC4a.</u></p> <p>CST STRONGLY SUPPORTS the inclusion of Bolton Abbey as a Tier 4b in the settlement hierarchy of policy SP4 and welcomes the inclusion of a specific criterion (E) to the policy that relates to development in bisected villages such as Bolton Abbey.</p> <p>However, whilst CST notes and understands CDC’s reason for not specifically allocating housing within Bolton Abbey, it must caveat its overall support for the policy on the basis of concerns regarding the effectiveness of the policy if the clarity above regarding housing development is not duly provided. Without that clarity the policy could be misunderstood and misinterpreted by Development Management Officers in so far as it relates to the acceptability of limited housing growth at Bolton Abbey. On that basis there is a risk that the policy may fail to be <i>effective</i> in terms of the intention to support development and include limited housing growth at Bolton Abbey.</p>
<p>DRAFT POLICY EC4: TOURISM p.193-196</p>	<p>CST has 450,000 visitors per annum to its CVA, which acts as a southern gateway for many of the 3.5 million visitors per year to the National Park, and wishes to <u>SUPPORT</u> the introduction of a policy that provides general support for multiple types of tourism development. The tourism sector and economy covers many areas including holiday cottages, day visitor attractions, eating and drinking establishments, countryside access etc., as reflected at Bolton Abbey, and as needed in the interests of rural diversification and regeneration. In CST’s view an over-arching tourism policy is needed in the Local Plan, as proposed by CDC.</p> <p>Of particular relevance to Bolton Abbey, the policy states that:</p> <p><i>‘Tourism will grow in a sustainable way, so that it helps to improve the economy, environment and quality of life. Such growth will be achieved by:</i></p> <p>...</p> <p><i>g) Supporting, in principle, proposals for tourism development and for achieving synergies of co-location, in the following key locations for tourism development identified on the policies map: Bolton Abbey/Bolton Abbey Railway Station” (our emphasis)’</i></p> <p>The wider policy has seen amendments and additions since the second draft pre-publication draft Local Plan although not in a way which has impacted on the above reference.</p> <p>CST therefore supports the policy and its reference to Bolton Abbey during the last consultation, only going on</p>

	<p>to object to the lack of inclusion of any additional more detailed policy guidance relating to Bolton Abbey. This is now addressed by the inclusion of policy EC4a, in the current draft Local Plan.</p> <p>CST <u>SUPPORTS</u> the positively framed tourism policy EC4 as it relates to its interests in, and contribution to, the tourism sector.</p>
<p>DRAFT POLICY EC4A: TOURISM-LED DEVELOPMENT AT BOLTON ABBAY p.196-197</p>	<p>CST <u>STRONGLY SUPPORTS</u> this policy which was first introduced into the draft Local Plan at the third pre-publication draft consultation stage.</p> <p>CST's comments on the second pre-publication draft in 2016 included an objection to the lack of certainty that the plan provided for development at Bolton Abbey. The response dated May 31st 2016 stated:</p> <p><i>'While CST <u>supports</u> draft policies SC4 and EC4 as they relate to the identification of the village as a suitable location to receive development, CST <u>strongly objects</u> to the failure of the Local Plan draft to provide plan led certainty on how this development will be delivered and to identify the Bolton Abbey Village Masterplan site for development.'</i></p> <p>In response CDC introduced policy EC4a in the third pre-publication draft local plan.</p> <p>The policy positively addresses many of the weaknesses and threats identified in the Bolton Abbey Tourism Development Strategy 2014 which followed on from a wider review of the Bolton Abbey operation by CST in 2012. These weaknesses and threats are more comprehensively identified in the BADOAS report (2017) as follows:</p> <p><i>'Weaknesses: lack of sense of arrival (and departure); visitor operation dependent on weather and school holidays; brief trips with little or no secondary spend; major planning constraints limit growth; high maintenance costs; loss-making entities (e.g. Post Office); staff cannot afford local house prices (i.e. long journeys to work); limited visitor accommodation; the CVA therefore has a limited and low value offer to visitors</i></p> <p><i>Threats: wetter summers; limited staff/other accommodation; increased competition; rising costs; planning constraints; listed buildings at risk.'</i></p> <p>CST considers that the introduction of the policy (in the draft CDLP 2017 and maintained in the PDCLP 2018) fully responds to the issues raised in the consultation response on the Local Plan in May 2016 and reflects its engagement with CDC since the review of the visitor operation at Bolton Abbey since 2009. The policy</p>

wording of CDC has been the subject of input from CST, HE, YDNPA and all organisations are in general agreement in relation to it.

An addition to the Publication draft Local Plan is the inclusion of a footnote at p.188 which directly references the BADOAS report:

'48 A map showing the boundary of the Bolton Abbey Core Visitor Area (CVA) is provided in the Bolton Abbey Development Options Appraisal Study (BADOAS), which has been prepared by the Bolton Abbey Estate in liaison with local and external stakeholders. The CVA extends from Bolton Bridge to Barden Bridge, includes Bolton Abbey Station and is bisected by the boundary of the Yorkshire Dales National Park. That part of the CVA falling within the Craven Local Plan area is shown on the Policies Map (Inset Map No. 24).'

CST SUPPORTS the introduction of this reference in the plan to the BADOAS which forms an integral part of the evidence base for policy EC4a.

CSTs only remaining comment on policy EC4a relates to the reference in the policy that:

'Before any development takes place, a comprehensive strategy and Masterplan for the Core Visitor Area, including detailed development and design principles, shall be produced in collaboration with, and to the satisfaction of, the local planning authority and other key stakeholders, including the Yorkshire Dales National Park Authority, Historic England, Natural England and the Environment Agency.'

It is CST's view that the requirement to seek 'the satisfaction' (difficult to measure) of five different authorities could ultimately act as a constraint to the delivery of the development which the policy seeks to facilitate, especially given that the need for such development is now pressing.

CST acknowledges the importance of collaboration with all of the stakeholders listed. However in order to ensure the effectiveness of the policy suggests that the policy is reworded to refer to 'the satisfaction' of the local planning authority (Craven District Council) only. The satisfaction of CDC as the LPA can of course be measured based on the input and feedback of the key stakeholders listed (ie CDC would seek the views of other stakeholders before deeming it was satisfied accordingly). As such, an amendment would not dilute the approach proposed by CDC but simply make the policy more effective; it would also make it far simpler for a Development Management Officer assessing a development proposal to come to a clear conclusion regarding the extent to which the policy has been complied with.

	<p>We therefore recommend that the above wording is amended to state:</p> <p><i>'Before any development takes place, a comprehensive strategy and Masterplan for the Core Visitor Area, including detailed development and design principles, shall be produced to the satisfaction of the local planning authority in collaboration with key stakeholders, including the Yorkshire Dales National Park Authority, Historic England, Natural England and the Environment Agency.'</i> (our emphasis)</p> <p>CST is currently advancing work that will inform and underpin the detailed masterplanning process required by this draft policy EC4a, including a stone study and feasibility study. The stone study , as requested by Historic England as an important item, will establish: the type and quality of stone and slate used at Bolton Abbey; the type and quantum of stone and slate needed for related new build and repairs; where such stone and slate can be sourced from. The feasibility study will establish the exact mix and quantum of development to be taken forward in the Masterplan process, which as draft policy EC4a notes, is to involve the collaboration of various stakeholders (including CDC and Historic England).</p>
<p>SUSTAINABILITY OF DRAFT POLICY EC4A: TOURISM -LED DEVELOPMENT AT BOLTON ABBEY</p>	<p>CST wishes to SUPPORT the findings of the sustainability assessment (SA) of policy EC4a.</p> <p>The SA notes:</p> <p><i>'Reasonable Alternatives: None identified'</i></p> <p>CST would concur that in policy (rather than allocation) terms there is no reasonable alternative to the approach taken by CDC in introducing EC4a to guide and support new development at the Estate.</p> <p>The BADOAS report considered four options for development in the Bolton Abbey CVA and identified that only the option of <i>"Composite" development clustered around both Bolton Abbey village AND Bolton Bridge with some limited development (e.g. small age-specific play areas) throughout the CVA"</i> provided a realistic option to meet the area's development needs whilst also respecting and enhancing the sensitive nature of the historic environment there. The draft policy reflects, and will facilitate, the delivery of the part of the option relating to the Craven plan-area.</p> <p>The SA finds no negative impacts of the policy when assessed against the Strategic Objectives of the plan. Only <i>'Major positive effects'</i>, <i>'Minor positive effects'</i> or <i>'Neutral effect or no relationship identified'</i> are noted.</p> <p>In particular, numerous <i>'Major Positive Effects'</i> are considered to occur when the policy is assessed against the</p>

	<p>following draft Strategic Objectives:</p> <p><i>“SO1) Maximise employment opportunities within Craven SO2) Maximise opportunities for economic and business growth SO3) Promote equality and diversity, and foster community cohesion by reducing all forms of poverty SO12) Conserve and where appropriate enhance the historic environment including heritage assets and their settings and areas of identified and potential archaeological interest”</i></p> <p>The SA of Policy EC4a provides a robust validation of the policy introduced by CDC.</p>
<p>PROPOSALS MAP FOR BOLTON ABBEY</p>	<p>CST <u>SUPPORTS</u> the draft proposals map for Bolton Abbey (as shown at Fig.1 below).</p> <p>CST notes that the proposals map identifies the part of its Core Visitor Area (CVA) within the Craven Local Plan area with the legend ‘<i>Core Visitor Area (Tourism-Led, Mixed-Use Development Opportunity Site at Bolton Abbey) EC4a</i>’. CST notes that the area of its CVA which sits within the National Park has been taken off the map (at the request of the YDNPA). CST considers that the greater clarity provided by the proposals map is to be welcomed, but has no major comment on the change.</p> <p>The proposals map identifies:</p> <p><i>General locations for development within the Core Visitor Area at Bolton Abbey EC4a</i></p> <p>These locations are referred to in policy EC4a as:</p> <ul style="list-style-type: none"> - <i>Land including and surrounding the main village car park at Bolton Abbey village</i> - <i>Land to the north-north-west of the B6160 / A59 roundabout at Bolton Bridge</i> - <i>Land north of the highway spur (part of former A59) to the west of the B6160 at Bolton Bridge</i> <p>The proposals map provides clarity on locations for development incorporated in the policy and is supported as such.</p>

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INSET MAP No. 24: BOLTON ABBEY (1:23,000)

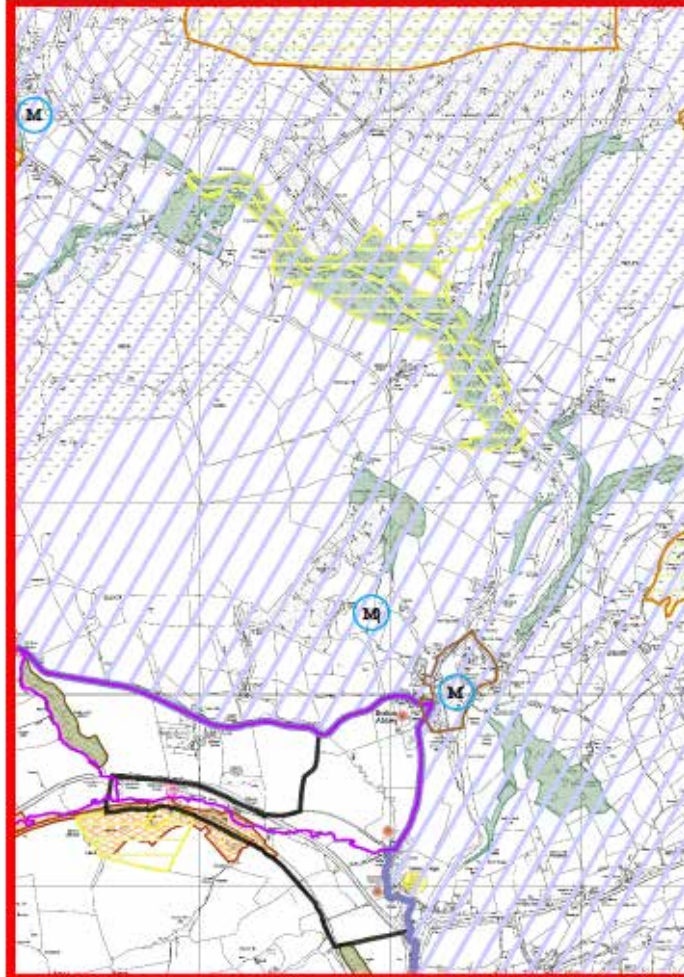


Fig 1. Draft proposals map for Bolton Abbey

Section 5: Detailed comments on other areas of the PDCLP

Local Plan Section / Policy	Comments
<p>DRAFT POLICY SP11: STRATEGY FOR TIER 4A AND 4B VILLAGES WITH BASIC SERVICES AND BISECTED VILLAGES WITH BASIC SERVICES</p>	<p>Whilst supporting the identification of Bolton Abbey as a 4B Settlement, CST notes that the wording of this policy is somewhat misleading.</p> <p>The opening to the policy states that:</p> <p><i>'Tier 4 settlements will receive a limited amount of growth that underpins their role and function as settlements with basic services and to ensure ongoing sustainability. Villages with basic services and/or tourism function which are bisected by the National Park boundary also receive an appropriate level of growth on the following sites:'</i> (our emphasis)</p> <p>The policy then goes onto list four sites for allocation. The wording highlighted in bold above would suggest that all of the sites listed are to be found in villages bisected by the National Park boundary. That is not the case and only of the four allocated sites is in a village bisected by the National Park boundary (Giggleswick). The other three sites are in 4A villages, not 4B (bisected villages).</p> <p>Whilst the policy may be incorrectly worded in this regard, CST is concerned that the policy as worded could also cause confusion at the development management stage. The policy as worded could be incorrectly interpreted in isolation as only allowing development in 4A and 4B villages on the named allocated sites. Policy SP4 criterion H supports development on previously developed sites in the main built up area of settlements in Tier 1 – 4A/B settlements, whilst criterion I of that policy supports the release of non-allocated sites adjoining the main built up area, subject to compliance with one of three listed sub-criteria including:</p> <p><i>'c) development is justified by special economic, environmental and /or social circumstances,'</i></p> <p>It is strongly recommended that the policy wording highlighted above is amended for clarity to read:</p> <p><i>'Tier 4 settlements (including villages with basic services and/or tourism function which are bisected by the National Park boundary) will receive a limited amount of growth that underpins their role and function as settlements with basic services and to ensure ongoing sustainability. An appropriate level of growth will be delivered on the following allocated sites (in addition to development on non-allocated sites that conform to policy SP4 criteria)... '</i></p>

	This change will make the plan more legible and effective.
DRAFT POLICY EC3: RURAL ECONOMY	<p>The policy states in relation to the rural economy that:</p> <p><i>Craven's rural economy will be supported, so that it may grow and diversify in a sustainable way to provide long term economic, environmental and social benefits for local communities. This will be achieved in the following ways:</i></p> <p>(non-relevant bullet points omitted)</p> <p><i>c) Helping existing and new rural businesses, including tourism related businesses to succeed, grow and expand, by working with them co-operatively and proactively, so that development proposals can be supported wherever possible; (text in bolds is that which has been amended or added to the policy in the current draft).</i></p> <p>CST <u>SUPPORTS</u> the inclusion of the highlighted text which provides further recognition of the benefits of tourism (and its diversification) to the rural economy of Craven.</p>

<p>INSET MAP No. 20: EMBSAY WITH EASTBY</p>	<p>CST owns land to the south of Shires Lane and east of the cricket field, Embsay.</p> <p>The land received planning consent in 2016 at appeal for housing development.</p> <p>CST <u>SUPPORTS</u> the identification of the land concerned as an Existing Housing Commitment on the proposals map for Embsay.</p>
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Section 6: Comments on the Soundness of the PDCLP (as it relates to the policy approach to Bolton Abbey)

Local Plan Section / Policy	Comments
Whole plan (as it relates to Bolton Abbey)	<p>As well as <u>STRONGLY SUPPORTING</u> draft policy EC4a, CST <u>CONSIDERS</u> the policy (and the approach of the CDCLP to delivering development at Bolton Abbey) is sound.</p> <p>In relation to the tests of soundness incorporated in the NPPF at paragraph 182 we note as follows:</p>

	<p><i>“● Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;”</i></p> <p>The policy and approach to delivering development at Bolton Abbey has been positively prepared following years of engagement between CST and CDC (and the YDNPA as neighbouring planning authority) following an internal review of the Bolton Abbey visitor operation since 2009. The development and management requirements of Bolton Abbey have been assessed via numerous surveys and assessments which have been produced and shared with CDC and other stakeholders. These include:</p> <ol style="list-style-type: none"> 1. The Bolton Abbey Heritage Capacity Assessment (by FAS) 2. The Bolton Abbey Landscape Capacity Assessment (by Gillespies) 3. The Bolton Abbey Transport Statement (by Arup) 4. The Bolton Abbey village Masterplan (by CST) 5. The Bolton Abbey Visitor Accommodation Needs Assessment (by Frey Consulting) 6. The Bolton Abbey Staff Accommodation Needs Assessment (by Frey Consulting) 7. The Bolton Abbey Ecological Statement (by BLE) 8. The Preliminary Bolton Abbey Heritage Assessment (by ArcHeritage) 9. The Preliminary Bolton Abbey Landscape Appraisal (by Gillespies) 10. The Bolton Abbey Estate Tourism Development Strategy (by CST) 11. Bolton Abbey Heritage Landscape Management Plan (by English Nature et al). <p>Furthermore, all of these documents have informed the BADOAS document by Lichfields (2017), and some have informed the earlier Bolton Abbey Village Masterplan 2015 by Rural Solutions.</p>
	<p><i>● Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;</i></p> <p>CDC has been presented with various strategies for delivering development at Bolton Abbey including a large site allocation. It has determined that a specific policy based route is the most appropriate route. Liaison with CDC has also led to CST: increasing the number of strategic development options considered; reducing the scale of its development aspirations; adjusting the proposed layout so as to respect medieval features; increasing the amount of planting to screen development from sensitive views (including some in the YDNP).</p>

	<p>The SA of the policy by CDC has identified no reasonable alternatives. This is the view also of the BADOAS report which considered four development options and found only one realistic option to accommodate development.</p> <p>CST considers that CDC has justified why the policy based approach outlined in EC4a is the most appropriate strategy for delivering development at Bolton Abbey.</p>
	<ul style="list-style-type: none"> ● <i>Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities;</i> <p>Proposals for delivering development at Bolton Abbey have been brought forward via an indicative Development Masterplan which has formed the basis of discussion with CDC, YDNPA, HE and other organisations. The policy wording incorporated within EC4a has been the subject of informal consultation with CST, YDNPA and HE prior to its inclusion for public comment. The policy wording is broadly or entirely supported by all consulted and it therefore presents an effective framework for the delivery of development over the plan-period.</p> <p>Furthermore, the BADOAS includes a specific section (eight) on how development will be delivered in the CVA in terms of Design, Delivery Mechanisms, and Phasing, thus demonstrating the effectiveness of the policy.</p> <p>The SA of the policy identifies that the policy will be effective when considered against a number of objectives of the CDCLP.</p> <p>CST considers that the general policy approach to development at Bolton Abbey is sound but considers that amendment to the wording of policies SP4 and SP11 is required, as set out in this response, in order to make it clear that some housing development will be acceptable as part of the development to take place in this location.</p>
	<ul style="list-style-type: none"> ● <i>Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</i> <p>The policy approach to BA is considered to accord with national policy. It is positively framed and gives importance to tourism development, the rural economy and protection of heritage and environmental assets, all of which are given importance in the Framework. Both CDC and HE have accepted that heritage, as confirmed by the NPPF, is only one factor in providing for sustainable development and the policy reflects this</p>

	balance. The SA of the policy notes that there will be Major Positive Effects in terms of heritage interests in Bolton Abbey.
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Section 7: Comments relating to the Duty to Co-operate (as it relates to the policy approach to Bolton Abbey)

Local Plan Section / Policy	Comments
Whole plan (as it relates to Bolton Abbey)	<p>CST considers that the approach taken by the PDCLP reflects a positive and cogent approach to cross-boundary working in this part of the plan-area. It is very clear that the duty to cooperate (as it relates to this part of the plan area) has been met.</p> <p>CST has attended numerous meetings at which representatives of both CDC and the YDNPA were present, to discuss the policy approach to Bolton Abbey.</p> <p>CST supports CDC for including Bolton Abbey in the Local Plan's settlement hierarchy in line with the inclusion of the settlement as a service village in the adopted Yorkshire Dales Local Plan.</p> <p>In relation to policy EC4a CDC has fully consulted with and considered the views of the YDNPA in creating this policy and it is noted that the policy requires a masterplan to be produced in collaboration with the YDNPA as a 'key stakeholder'.</p> <p>CST comments on the duty to co-operate only in so far as it relates to Bolton Abbey - and in doing so considers that CDC has fully discharged its duty.</p>

