



# YORKSHIRE GARDENS TRUST

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[www.yorkshiregardenstrust.org.uk](http://www.yorkshiregardenstrust.org.uk)

Neil Bearcroft  
dmsplanning@wakefield.gov.uk

11 Caroline Close  
York YO24 4EQ

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Dear Mr Bearcroft

## **Planning reference 23/02397/FUL**

**Land At 430178, 412891 (Field 1); 431408, 412579 (Field 2); And 431717, 412263 (Field 3), Land At Haigh Lane And Land At Woolley Edge Lane, Wakefield, S75 4BA. Construction of a renewable led energy generating station comprising ground-mounted photovoltaic solar arrays together with substation, transformer stations, grid connection infrastructure, grid cable route, site accesses, access gates, internal access tracks, security measures, storage compound, other ancillary infrastructure and landscaping and biodiversity enhancements**

Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee for proposed developments that could affect sites included by Historic England (HE) on the Register of Parks & Gardens. Yorkshire Gardens Trust (YGT) is a member organisation of GT, works in partnership with it in the protection and conservation of registered sites, and is authorised by GT to respond on GT's behalf in such consultations.

This response relates solely to the impact of the above application on the Registered Park and Garden (RPG) of Bretton Hall Park, and is made in the context of the information and characteristics for which Bretton Hall Park is registered at grade II by Historic England.

YGT accepts that climate change is an existential threat to the future of RPGs, and that shifting from fossil fuels to renewable energy as quickly as possible is a critical tool for mitigating the impacts of climate change. We support, therefore, the principle of this application. However, we are surprised to see that, despite references in the Landscape and Visual Impact Assessment (LVIA) to possible adverse visual impacts upon the views outward from the RPG, none of the viewpoints assessed (with the exception of viewpoint 11, and the technical exceptions of the boundary viewpoints 10 and 12) are taken from within the Park. Further, all the Viewpoint photographs show the predominant woodland type of native deciduous trees in full leaf in high summer. Our site visit, made on 4 February 2024, suggests to us that there are several places in the RPG from where the solar array will probably or possibly be visible.

The application notes Viewpoint 10 as a location from which the array will be visible. We believe that in months when the trees are not in full leaf it will also be visible on the Park footpath from the Visitor Centre, past the Chapel, leading to The Weston and its associated parking. Similarly, the array is likely to be visible from the footpath along the north side of the lake towards the Dam Head and Bridge, and The Weston. We think it will certainly be visible from the Dam Bridge and from the Dam itself.

The LVIA notes that from Viewpoint 11 – inside the RPG – the array ‘will be partially visible on the rising ground in the distance’ and we observe that horse riders on the bridlepath will inevitably see more than those on foot. At Viewpoint 12, on the boundary of the RPG, the LVIA notes that the array ‘will be partially visible on

the rising ground in the distance', and notes that trees provide some screening as the footpath descends to the east. Again, however, the LVIA takes no account of leaf fall.

Our observations suggested that the array might be visible from the Visitor Centre's first floor café and from sections of the footpath leading down to the lake along the western edge of the YSP, in the centre of the RPG itself.

Bretton Hall Park occupies a valley shaped not unlike a spoon rest. Viewed from the centre of the bowl the sides curve up, and, for the most part, reveal sky, or bucolic and sylvan hillsides bordering or outside the RPG. The Weston sits at the point where the handle of a spoon would rest, where there is no protective lip, and so gives views to the site of the array, at present as bucolic and sylvan as the majority of the views outward from the RPG. It's this rural character outside the Park that gives the Park much of its visual aesthetic, unusual and precious in this area. We contend that it is important to protect this characteristic as much as possible.

In that spirit, and because there is the potential for less than substantial harm to be caused through the adverse visual impact, we suggest that a more detailed LVIA is made from within the Park, taking into account the varying leaf and no leaf views. This LVIA should investigate whether it is possible to mitigate the array's impact on views from inside the RPG by, for example, planting specimen evergreens in strategic locations (such as The Weston car park). Similarly, it should investigate whether reducing the number of solar panels at the higher end of the array's site could remove them from any view from inside the RPG.

Yours sincerely,

Chris Webb

Chair, YGT

Cc Historic England, [e-yorks@historicengland.org.uk](mailto:e-yorks@historicengland.org.uk) ; [Conservation@theGardensTrust.org](mailto:Conservation@theGardensTrust.org)