



YORKSHIRE GARDENS TRUST

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6 July 2024

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 re-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. The response concentrates on the additional papers submitted for this application.

1. We reiterate that 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.

2. We reiterate that there is the potential for less than substantial harm to be caused through the adverse visual impact that is acknowledged to be present in this application.

3. Landscape Visual defends its choice of viewpoints in para 5 of their response:

‘LVIA work tends to focus on publicly accessible viewpoints (Guidelines for Landscape and Visual Impact Assessment, LI and IEMA 2013 (Section 6)). Most of the RPG is only accessible to the public by admission fee.’

We note that the NPPF (December 2023, paras 195 to 214, and earlier versions) makes no distinction between public and private access to heritage assets in relation to their treatment as heritage assets.

4. We can see no reason, therefore, why additional views from within the RPG should not be provided as part of the application, as recommended in our first response. In that response we identified places within the Park from which the array might be visible. The Head of Estates and Projects at Yorkshire Sculpture Park makes a similar request in his submission dated 3 April 2024. We note that no additional views have been submitted as part of the LVIA, so our recommendation stands unamended.

5. The additional response from Landscape Visual does not address the fact that deciduous trees do not provide the same amount of visual cover in the winter as they do when they are in full leaf.

6. Headland Archaeology's second submission after a site visit on 25 April 2024 is helpful. Paragraphs 1-10 largely reiterate the contention that harm to the RPG from the proposed array is less than significant. Nevertheless, harm is acknowledged, and subsequent paragraphs include useful viewpoints illustrating from where, and to what extent, the array would impact upon the RPG.

7. Again, however, these views show (mainly) tree cover in full leaf. Harmful impacts will be greater when the trees are bare of leaves. We note also that in discussing the dynamic impact of views towards the array, consideration is given to movement only in one direction, downhill. The uphill impact will be different.

8. Headland's discussion of the impact of the array on views from heritage buildings is helpful. Headland demonstrates (para 25 onwards) that from Archway Lodge there is visibility, and that such visibility would be greater during winter (para 33). It's not clear to YGT that there is no intervisibility from other sites inside the RPG, including from the first-floor café.

9. Both YGT and the Yorkshire Sculpture Park contend that the rural character of the views outward from the RPG make a positive contribution to the significance of Bretton Hall Park. YGT agrees with the applicant that the degree of harm is less than substantial, but points to the possibility of real mitigation of any harm by appropriate planting and the application of tree preservation orders to maintain the effect of such planting. We reiterate our recommendation to 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.

10. The NPPF requires (para 196) that '*Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:*

- a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
- b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- c) the desirability of new development making a positive contribution to local character and distinctiveness; and
- d) opportunities to draw on the contribution made by the historic environment to the character of a place.' [YGT's italics]

11. YGT believes that the plans as presented identify harm to the setting of Bretton Hall Park RPG and that para 196 applies.

12. YGT further believes that NPPF para 201 applies here:

‘Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (*including by development affecting the setting of a heritage asset*) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal.’ [YGT’s italics]

Yours sincerely,

Chris Webb

Chair, YGT

Cc Historic England, e-yorks@historicengland.org.uk ; Conservation@theGardensTrust.org