



YORKSHIRE GARDENS TRUST

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Mrs Val Hepworth

Ms Kate Broadbank
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Dear Ms Broadbank

20/04773/EIAMAJ Outline planning permission for the demolition of existing buildings and the development of up to 350 holiday lodges, with access considered, including hotel (up to 30 bedrooms), pub/restaurant, farm shop, cafe, gift shop, activity hub, wine house, indoor swimming pool, spa, indoor leisure facilities, outdoor sport/leisure facilities, landscaping, parking and access. Flaxby Leisure Park Flaxby Knaresborough North Yorkshire HG5 0RR

The Gardens Trust (GT) is Statutory Consultee, with regard to any proposed development affecting a site listed by Historic England (HE) on their Register of Parks and Gardens. The Yorkshire Gardens Trust (YGT) is a member organisation of the GT and works in partnership with it in respect of the protection and conservation of registered sites, and is authorised by the GT to respond on GT's behalf in respect of such consultations. This application lies within the setting of Allerton Park, a site included by Historic England (HE) on their Register of Parks & Gardens, at Grade II.

We have not been consulted but have been notified by colleagues in other organisations.

This application is for land immediately west of the A1(M) and north of the A59, the site of a former Golf Course which we understand has been constructed on agricultural land since 1990. It lies directly west and south-west of Allerton Park which includes a number of heritage assets; particularly relevant to this application are the mansion Allerton Castle Listed Grade I and the Temple of Victory Listed Grade II*. Both these nationally important buildings are situated in historic designed elevated positions commanding the landscape, and thus making them and their significance more vulnerable to development in what has been until recently a rural landscape setting. The application site also sits within the Local Landscape Character Area 68 (Hunsingore and Hopperton) wooded farmland.

The Temple of Victory is particularly iconic and prominent – as intended - in views beyond the boundary of the Registered Park and Garden. And from the Temple there are panoramic rural views looking west and south-west without any significant interruption from development. However, this planning application, unless more carefully considered, will harm these views. We note that the Proposed Masterplan shows a very narrow and constrained viewing corridor from the Temple of Victory and similarly the 'Parameter Plan – Heritage Considerations Rev F' which we consider is a very poor analysis. It is readily apparent that a 'viewing corridor' is not at all the same as the breadth of reciprocal view that is intended with these historic designed features, and which has existed on

this site for more than 250 years. The north of the site seems to be the most sensitive, and we advise a reduction of the number of lodges so they do not go into this area.

We also note EIA ES Vol 2 Chapt D Heritage (Sept 2020) p20:

‘During Operation D7.4 Consideration has been given to further mitigation which could reduce the effects of the development, or enhance the value of the heritage assets, though none has been identified. D7.5 The effects therefore remain the same as those identified in Section D5.0. Residual effect on heritage significance for Allerton Park, The Temple of Victory and The Mansion (Allerton Castle) are all Minor Adverse.’ We disagree; having visited Allerton Park and its heritage assets and seen the aerial photographs we consider that the development is likely to have significant harmful impact and will reduce the openness of the landscape through the urbanising effect of development.

We would like to point out Appendix 1 significance of heritage assets affected, that was submitted by Historic England (HE) with their letter of 3rd February 2021 which we wholly support. We ask that these should underpin plans for Flaxby Leisure Park.

We also have concerns about the cumulative visual effect of other development on Allerton Park and its heritage assets, especially The Temple of Victory. The proposed Employment Park, **21/01238/EIAMAJ** is of particular concern here. This hybrid application sits directly south of the site and south- west of the A59/ A1(M) junction, and about which we wrote to your colleague Mr Andy Hough on the 24th April 2021 and the 29th August 2021. The Landscape and Visual Impact Assessment (LVIA) for 21/01238/EIAMAJ viewpoints 9 and 10 must be looked at in relation to the LVIA (Environmental Impact Assessment ES Vol 2 Chapt F Landscape and Visual) for this present application ie 20/04773/EIAMAJ. The cumulative adverse impact of the recently approved housing as well as the extensive Employment Park, is a serious consideration as it already places increased pressure on the roads, infrastructure and the rural environment thereby also having a further deleterious effect on the heritage assets.

We would also point out in the Design and Access Statement 3.0 Layout and Urban Design Analysis ‘The indicative proposed masterplan represents the results of an involved scheme development exercise. The key driving factors of the scheme include: • Potential viewing corridors to the Allerton Castle and Temple of Victory but not from them’. We disagree with this driving factor and underline our previous point (supported by HE) that the historic buildings were designed and positioned to have wide views out into the surrounding countryside as well as being seen from afar. The scheme specifically designs out and destroys a critical feature of these heritage assets, thereby undermining the criteria for which they gained their present listed status. We consider that the plan does not sufficiently understand, and take into account, the nature of the heritage assets. And ‘Urban Design’ in our view is not what is required on this site, just the reverse; the character should be principally rural.

We support and refer you to the points made in the report from your Authority’s Principal Landscape Architect, Helen Golightly, dated 15th December 2021 and for brevity will not repeat them here. In terms of the planting and landscaping design we cannot find any details to convince us that this has been carefully considered to be sufficiently sympathetic to the historic views from The Temple of Victory and Allerton Castle, and to enhance the site borrowing from its historic patina of hedgerows that will be evident on early OS maps. For example, OS 25”:1mile map published 1893 shows trees bounding the Old York Road between Flaxby and the Great North Road and there is also a lane and hedge with trees running south from the Old York Road connecting it with Flaxby Covert. A number of hedges shown on this OS map could be used to form wildlife corridors helping biodiversity whilst reflecting the landscape history in the new design. We advise that the planting and landscaping should reflect the rural nature of the area rather than a suburban palette of trees and shrubs. We also advise that the structural landscaping and planting should be implemented at the very beginning of development during the winter season with the necessary protection in place, so that the planting can get a good start in developing the aesthetic and greening nature that should characterise this site.

In terms of wider infrastructure and access we have not seen sufficient detail to understand how existing bridleways and Public Rights of Way and existing concrete roads are integrated with the scheme and how this relates to Green infrastructure. Reference is made to Play Areas, Go- Ape, Trim trails, Vegetable Garden and Arboretum but these features are not shown on the plans. Leisure facilities such Go-Ape have the potential to be damaging and there needs to be careful consideration of road and path surfaces to ensure their porosity and sympathy with a rural environment. We are bemused by the reference to a walled garden as the inspiration for the external spaces associated with the Hub building. This is a laudable proposition but from our extensive knowledge of walled gardens what is proposed does not equate with them. We also have concerns about light pollution and its urbanising effect and the consequential harm it will inflict upon heritage assets and wildlife.

We have concerns regarding the application. We do not consider that this application meets the requirements of NPPF (July 2021) paragraphs 130, 197, 199, 200, 202 and 206.

In determining this application, you should bear in mind the statutory duties of sections 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. Section 66(1) requires you to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess. Section 72(1) requires you to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

In addition, we would draw your attention to the Objectives 6 (Heritage and Placemaking) and 7 (Natural Environment) of the Harrogate District Local Plan, supported by the requirements of respective Policies HP2, NE3 and NE4.

In conclusion the Gardens Trust and the Yorkshire Gardens Trust wishes to register their objection to this application in its present form.

Yours sincerely

Val Hepworth
Trustee and Chairman Conservation and Planning

Cc John Stonard, Team Leader Development Advice, Yorkshire and the Northeast Historic England;
Margie Hoffnung, the Gardens Trust