



# YORKSHIRE GARDENS TRUST

President: The Countess of Harewood

Vice-presidents: Lady Legard, Peter Goodchild, Nick Lane Fox

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

[planningconsultation.har@northyorks.gov.uk](mailto:planningconsultation.har@northyorks.gov.uk)

Emma Walsh  
Senior Development Management Officer (Harrogate Office)  
Economy Environment and Housing  
North Yorkshire Council  
PO Box 787  
Harrogate, HG1 9RW

Chris Webb  
Chair  
Yorkshire Gardens Trust

28 August 2024

## **Planning Applications ZC23/02884/LB; ZC23/02883/FUL**

### **Objection response to the National Trust planning applications for Fountains Abbey/Studley Royal, as revised, 28 August 2024**

Thank you for consulting Yorkshire Gardens Trust (YGT) in our role as consultee with regard to any proposed development that could affect a site included by Historic England (HE) on their Register of Parks Gardens in Yorkshire. The Yorkshire Gardens Trust is a member organisation of the Gardens Trust (GT), the statutory consultee, and we work in partnership with it in respect of the protection and conservation of registered sites. YGT is the sole expert body that focuses exclusively on Yorkshire sites.

#### YGT SUPPLEMENTARY RESPONSE

##### SUMMARY

YGT welcome the beneficial changes presented in this application: the planting, the reduced footprint of the café and the more recessive appearance of Lodge and café as a result of more sympathetic landscaping. There remain unanswered questions, however, that YGT hold are critical to the determination of this application. Because of this, YGT maintain our objection to it. We believe, however, that with more work and development it could become acceptable.

## THE PROBLEM

At the heart of the application is the recognition by all parties, including YGT, that the Lodge and its associated development is the principal object bringing degradation to this part of the World Heritage site; and alongside that, a recognition by all parties that removal of the Lodge is not an acceptable means of addressing the degradation. The problem is how to mitigate the degradation associated with the Lodge, which all parties agree is not large enough nor configured in such a way (in either its present or original form) to meet all the functions NT demand of it, now or in the future.

These functions are:

- Pay barrier, welcome and orientation
- Toilets
- Changing space
- Catering
- Interpretation to serve the whole Water Garden site

NT's data show that the functions serve visitors already in the Water Garden (85%) and visitors entering the Water Garden from the Deer Park (15%). The balance of visitors is said to be likely to change (fewer entering the pay barrier at the Canal Gates) as a result of this application and of a companion application (already approved) to provide kiosk facilities in the toilet block adjacent to the car park outside Canal Gates. NT expect the number of visitors to rise by 6.5% by 2027/28. There are no visitor projections further forward, though the commercial recovery time for the cost of this project is set at 20-25 years, and the new build itself is designed to last 75 years. The projections thus relate to, at most, 2 years of the new building's life.

This revised application attempts to show that all these functions are necessary and desirable at this location, and that, because the present Lodge cannot accommodate them, a new building is a logical consequence. The burden of the application and responses to it centre on the visual impact of the design and setting of the new building. Almost no attention has been given to the other impacts that the changes might have; and almost no-one has questioned whether all these functions are necessary or desirable at this point in the WHS.

## CONSERVATION BENEFITS FROM THE APPLICATION

NT rightly point to the conservation and heritage benefits associated with the proposed changes. NT and most responders (including YGT) acknowledge that this part of the WHS is degraded, and that elements of it (including the rendering of the Lodge, its extensions and outbuildings) are harmful to the OUV of the WHS. This is despite excellent work by NT to remove the former island in the lake and other improvements made over several years. YGT welcome these proposed changes. The conservation benefits include:

- Nearly all the landscaping changes: new hedges, new trees, new lawns.
- Removal of extensions to the Lodge.
- Reinstatement of appropriately designed windows.

- Re-rendering the Lodge in a more muted colour.
- Adding climbers to the Lodge to break up its outline.
- Reinstatement of the historic bosquet inside the Canal Gates and associated planting and path reconfiguration.

It's important to note that most of the landscaping changes (including removal of the unsightly and inappropriate fence installed by NT as a barrier between the Lodge and the Water Garden) can be implemented without making alterations to the Lodge. For clarity, this does not apply to the beneficial changes to the Lodge itself, or to the reinstatement of the bosquet and associated works.

#### NECESSARY IMPROVEMENTS

NT rightly point out that the visitor and staff facilities in the Lodge are inadequate (and may not meet the requirements of the Disability Discrimination Act). YGT agree that these problems must be solved:

- Accessibility: doorways and corridors are too narrow, there is a lack of turning space for ambulant and non-ambulant disabled, and changes of level.
- Toilets should be on a level with the Water Garden to avoid the present climb to the car park toilet block, and easily located by visitors from inside the Water Garden and from the Deer Park.
- Provision of changing facilities for infants and others.
- Better visitor welcome and orientation for visitors entering the Lodge through Canal Gates, and orientation for those entering the Lodge from the Water Garden.

NT point also to the improvements in the café area provided by the new building, including accessibility improvements. We return to this in the section 'The Café' below.

#### INTERPRETATION SPACE

NT have followed the opinion of ICOMOS in devoting much of the floor space in the reconfigured Lodge to interpretation and have provided an indicative example of how this space might look and what it might contain. The National Trust Supplementary Statement (NTSS) shows that at present 9m<sup>2</sup> of the Lodge and outbuilding/extension space is devoted to interpretation and welcome, while the reconfigured Lodge and new build will provide 182m<sup>2</sup>.

But as we submitted in our first response, physical interpretation is not the most appropriate or forward-looking way to enhance understanding of a complex site whose level circuit is about 2.25 miles, but whose enjoyment on a single visit can stretch for far longer (in time and distance) than the hour or so this implies for an average walker. It consumes space at this point in the World Heritage Site (WHS) that can be better used in other ways, and makes it harder to maintain the visual, environmental, and atmospheric values ('feeling and spirit' in NT's words) that are integral to the WHS. Nearly all visitors have a modern phone capable of being equipped with apps, which are fast becoming the best way to explore complex heritage sites, indoors and outdoors. For example, in this region alone the Bloomberg Philanthropies app provides

coverage of Fairfax House and the Merchant Adventurers Hall in York, Wharfedale Medieval Village, Goole Museum, Leeds Art Gallery, The Hepworth, Wakefield, Beverley Guildhall, The Yorkshire Sculpture Park, and many more across the nation, both indoor and outdoor.

NT's argument (following ICOMOS) that physical interpretation space is necessary at this location is, simply, misguided. The space it consumes, which is at a premium in this location, could and should be directed to more important functions that cannot be provided elsewhere or in other ways.

Part of the argument for having better facilities at Canal Gates is that they will help to relieve pressure on visitor numbers at the Abbey. That would be a beneficial outcome. YGT contend that if physical interpretation space must be provided somewhere, then it is at the Abbey and Visitor Centre (VC) end, which greets the vast majority of visitors, where it would be most effective in opening visitors' eyes to the delights that lie beyond the Abbey ruins.

#### THE CAFÉ

Refreshment has been provided at this site for as long as anyone can remember. NT argue, with justification, that it should continue to be provided for the 75% (80% in 2023) of visitors who have already passed the Visitor Centre café, the 10% (8% in 2023) who have passed near the Mill café, and the 10% (12% in 2023) who enter at Canal Gates. It's not clear that refreshment is a necessary provision at this location, but it has the virtue of long tradition to argue for its continuation.

In the first application NT argued that the much larger building they applied for was the minimum necessary to satisfactorily meet the functions they require of it, and to address the problem of visitor queues and subsequent complaints to management. YGT argued in response that the data provided were poor quality and partial to such an extent that NT's argument was not evidence-based. In this application NT again argue that the new building is the minimum size required to meet demand projected to 2027/28, and in particular that the café, which is smaller than the present café, will be sufficient to meet NT's needs. There is an obvious credibility gap here that NT seek (and in our view fail) to close by the use of newly provided till data, and a restatement of their faith in the inelastic nature of local demand expressed through data relating to Deer Park entrances. YGT restate and reaffirm our critique of the data given to us in application 1. NT have not sought to address our criticisms, and we present a further critique of the new till-related data. We also renew our attack on the traffic data for the Deer Park entrance.

We need to acknowledge at the start that NT might not be as confident as they appear in the sufficiency of their reduced café seating. On page 23 of the NTSS they tacitly admit that there will be picnicking at the site: 'reducing the external seating area will still be sufficient for visitors as the introduction of more green space will provide informal outside seating opportunities'. NT do not seek to reconcile or explore their view that there is likely to be an increase in informal picnicking with its statement (also NTSS p. 23) that: 'Reducing the

footprint of the extension together with the significant reduction that would be delivered in the outside seating areas in combination will ensure that any *impact on the feeling and spirit of this part of the garden* has been further minimised and mitigated'. [YGT's italics] This is a startling omission.

The new data provided in this application stem from till transactions at the Visitor Centre and Lodge cafés (NTSS p. 24). They are samples taken on seven days over a calendar year to represent a mix of busy and less busy days, including some holidays, and using the busiest hour on those days. There is **no stated statistical basis** for these samples, so we have no idea whether they are representative of other days and other years. As throughout, **we have no trend data**, so the data are not useful in determining the strength or weakness of NT's argument.

Nevertheless, NT use these data to argue that the café needs to be reconfigured to a more efficient layout and that doing this will allow the staff to deliver a service more in line with the numbers of transactions it makes. NT analyse the transactions to show that the Lodge makes 60% of transactions compared with the VC, while having 30% of the indoor seats. This is not the most clearly made argument and is wrong in conception and detail.

Firstly, the transactions include indoor and outdoor customers. But NT's analysis includes only indoor seats. Secondly, NT calculate the relationship between the percentage of seats and the percentage of transactions by comparing the Lodge as a percentage of the VC. The calculation ought to be run based on the Lodge and the VC as percentages of the whole number of seats and the whole number of transactions. The table below shows the result. Percentages are rounded to the nearest whole number.

Café	Total seats	Percentage of seats	Transactions	Percentage of transactions
The Lodge	214	40%	137	37%
Visitor Centre	322	60%	231	63%
<b>Total</b>	<b>536</b>	<b>100%</b>	<b>368</b>	<b>100%</b>

Not for the first time in these two applications, the data do not show what NT say they do: the Lodge, with 40% of seats, handles approximately 40% of transactions.

The evidence and arguments put forward for the size of café at the Lodge do not carry any weight. YGT hold that on this evidence the scheme needs to be revisited to see whether a reconfiguration of the Lodge (without needless interpretation space) might be able to provide a better, more accessible facility, but on a smaller platform than the present scheme. That exercise would give us the confidence to judge whether NT have truly met their twice-stated claim that the Lodge is at the minimum size required to deliver its necessary functions.

#### THE DEER PARK, DATA AND ECOLOGY

YGT argued strongly in our first response that the special ecological characteristics of the Deer Park should be a material consideration in this application. NT have argued that the new Lodge will make no impact on the Deer Park, and therefore does not need to be considered, and that

demand at the Deer Park entrance is inelastic. As before, we argue that NT have no data on which to base their assertions; and in this response we further argue that NT fail to take into account important changes in the catchment area of the Deer Park that could have clear impacts on the numbers visiting through this entrance. Accordingly, YGT assert that paras 180-183, 185-186 and 188 of the NPPF (December 2023) have not been demonstrated to be met in relation to the Deer Park.

Firstly, we reiterate our paragraphs in our first response on the unreliability of the data provided for Deer Park entrance numbers.

Secondly, there is less evidence than previously to warrant the conclusion that local demand will continue to be inelastic. The new government has set a target for house building in North Yorkshire that is double the previous target. Harrogate Borough have built more homes than planned in recent times: there is already a large new estate at Kirby Hill/ Boroughbridge, well within what NT's evidence shows is the present catchment area for the Deer Park. It is irresponsible to assert without evidence that the changing numbers and demographic nature of our regional population will not impact on the Deer Park, and on such a short timescale.

Thirdly, nature-based sites of all kinds over the whole nation have witnessed large increases in the numbers of visitors using these sites to walk dogs. It would be surprising if the Deer Park has not experienced the same growth. NT do not address this post-Covid development.

Fourthly, as we argued last time, NT's contention that the new facilities will simultaneously draw visitors already inside the WHS to Canal Gates, but will not do the same for visitors entering the Deer Park, is not evidenced and so not credible. It is irresponsible to argue this on the basis of belief only.

We acknowledge that the new kiosk facility in the Deer Park will provide for some of the refreshment needs of those visitors who do not enter the Water Garden. On NT's figures, this is a substantial number. NT tell us that 128,000 people a year are estimated to enter the Deer Park by car. Of these, in 2023, 52,016 went on to enter through Canal Gates. This means that 75,984 stayed in the Deer Park. Is it truly realistic to expect no change either in the numbers visiting the Deer Park, or in the numbers entering via Canal Gates? Again, there is **no trend data** and as we showed in our first response, the figures for Deer Park visitor numbers are wholly unreliable. NT has made no effort to address this significant omission.

#### NON-VISUAL IMPACTS

Most of the responders to each application have concentrated on their visual impacts. Most responders (including YGT) to the present application acknowledge that the revised design mitigates the visual impacts to a greater degree than the previous design. However, visual impacts are not the only consideration.

NT implicitly recognise the importance of 'feel and spirit' when they write that they believe (NTSS p.23) that '*any impact on the feeling and spirit of this part of the garden has been further*

minimised and mitigated'. [YGT italics] Feel and spirit are a subtle blend of attributes. They change by season, and are particular to each person, their stage of life, their mood and outlook. They are affected by vision, light, sound, materials and design. Human presence and numbers, not just on a particular day, but over years and decades, is a determining component in all these elements, since human presence is a key influence on the natural and built environment. For the feel and spirit throughout this WHS we lack reliable data on visitor levels to make any judgement on whether feel and spirit are adversely or beneficially impacted, and whether NT are meeting their mission statement: For Ever, For Everyone.

YGT argue that we cannot deduce anything useful from the figures given for Deer Park entrances. The same goes for predicted visitor levels that are not placed in any wider context relating to even simple statistics such as population dynamics in the immediate area. Nothing is said about what impact expected picnicking at the Lodge may have, nor about car parking in the Deer Park, which remains unaddressed by NT despite its apparent link to the new facilities nearby. The Deer Park is an integral part of the WHS, whose special ecological characteristics are nationally important and could be degraded by additional visitors. These characteristics and their consequences are unlikely to be noticed by most; that does not mean that they do not contribute to Studley's OUV.

#### PLANNING CONDITIONS

If the local authority is minded to grant permission for this development, YGT recommends that these conditions are imposed:

1. The number of seats inside and outside the Lodge is set and monitored.
2. The number of picnickers around the Lodge are regularly surveyed and their impact assessed by an independent monitoring group annually.
3. The number of vehicle entrances to the Deer Park are continuously monitored; analysed by an independent monitoring group annually, and subsequently acted upon following monitoring group advice.
4. That NT consider implementing electric shuttles to the Deer Park from the VC car park, as they have done at other NT sites. That this consideration is revisited annually by an independent monitoring group and subsequently acted upon following monitoring group advice.
5. That the local planning authority appoint an expert consultancy to provide an Environmental Impact Assessment to include the Deer Park at NT's expense; and that the special ecological status of the Deer Park is monitored by appropriately qualified experts annually, the results considered at intervals recommended by the experts and subsequently acted upon following this expert advice.

#### CONCLUSION

For Ever, For Everyone is an ambitious and noble mission statement that carries with it a high degree of difficulty. It needs to be handled differently at different times and in different places. YGT argue that both versions of the applications for change at Studley Royal are primarily

based on present need. The lack of reliable data, the assumption that visitor requirements will remain the same, the failure to engage with new technology to interpret the site in exciting and mobile ways, all damage the application. Above all, the extreme short-term forward view and the concentration upon this small part of the whole site rather than seeing it as a single entity with links into the wider landscape fatally undermine NT's contention that the development maintains OUV and meets planning requirements.

Nevertheless, YGT believes that the application shows that with further thought (and time to think) we **can** have conservation benefits without this degree of harm; we **can** have accessibility, toilets and so on without this degree of harm. We urge the Planning Authority to encourage NT to take the time to think, to gather and marshal the data, and return with a plan that emerges from a full consideration of its impacts and consequences.

YGT continues to object to this application.

Your sincerely

Chris Webb  
Chair, YGT

[Yorkshire@historicengland.org.uk](mailto:Yorkshire@historicengland.org.uk)  
[consult@thegardenstrust.org](mailto:consult@thegardenstrust.org)  
[conservation@thegardenstrust.org.uk](mailto:conservation@thegardenstrust.org.uk)