



YORKSHIRE GARDENS TRUST

President: The Countess of Harewood

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www.yorkshiregardenstrust.org.uk

Rachel Tyas
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Dear Rachel Tyas

**25/02219/FULMAJ Erection of ground mounted solar farm, battery energy storage system (BESS) and associated infrastructure including access improvements, internal access tracks, 3no. power stations, 1no. switching station, 1no. meteorological station, 2no. storage containers, CCTV surveillance, fencing and ancillary development including landscaping and ecological enhancements
Juniper Farm Weeton Leeds LS17 0AY**

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 their Register of Parks & Gardens. The 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.

We are responding to this application in relation to its impact upon Harewood House Park and Garden, a Registered Park and Garden (RPG) at grade I.

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. At the same time, it is important that such developments are planned sensitively and with respect for the impacts they have on landscapes that are unique and irreplaceable. Harewood House Park is among the most important designed landscapes in England, attracting visitors in the hundreds of thousands annually. As well as fee-based access to the Park, it is crossed to the north and south by PROWs (bridleways) that are in frequent and regular use daily.

The impact of the development on the RPG is a key consideration in this application. Harrogate and District Local Plan policy HP2 affirms the importance of related paragraphs in the NPPF, that applicants should **ensure** that any development that would affect a Registered Park and Garden should not harm those elements which contribute to its layout, design, character, appearance or **setting** (including any key views **from** or **towards** the landscape) or prejudice its future restoration. The NPPF at paragraphs 189 and 190 sets out that in National Landscapes permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

- the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and

- any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

Our assessment of the documents submitted by the applicant, and of our field walking in the RPG and the development site, is that the impact on the RPG has not been appropriately considered. Our assessment is that the harm to the RPG is likely to be at the upper end of less than substantial and sustained over the forty-year life of the array.

We focus on the bareground ZTV because the applicant's mitigation of acknowledged and unacknowledged visual impacts is dependent upon trees and shrubs in leaf, either present already on the site or to be planted. Nearly all this cover is deciduous. In addition, the tree cover includes ash, a large proportion of which will not provide cover during the life of the array due to ash dieback disease. Thus for at least 6 months of every year during construction and operation of the site leaf cover will not be available at all, and is likely to diminish in effectiveness as ash dieback proceeds.

The desk-based Bareground ZTV Assessment describes areas of visibility in a 3km radius of the development site. It shows that there is visibility from LVIA viewpoint 9, and along the bridleway that runs east to west across the northern part of the Park. Walking west from the Church Lane end of the path shows little likely visibility until the PROW reaches a cattle grid that protects the open parkland to the north. From here as far as the commemorative seat sited to take advantage of this far-reaching view, the PROW runs approximately 30m above the height of the sole LVIA viewpoint from inside the RPG. The bareground assessment shows that the theoretical visibility from this PROW is always above 50%, and in much of its length is over 75%. Our observation on 24 August 2025 suggested, strongly, that only the fact that trees are in leaf prevented clear views of the site. It was also the case that the site is likely to be in view from the public footpath that descends from the Church Lane cattle grid through the deer park towards the Wharfe.

Apart from Viewpoint 9, the LVIA does not consider possible impacts from elsewhere inside the RPG. It states that '2.3.21 Views from a private property are not a material consideration in determining planning applications, unless the proposed change is sufficiently unpleasant or intrusive to cause unacceptable harm to residential visual amenity'. This does not hold true for views to or from RPGs, where the whole RPG must be considered, regardless of ownership. The omission of assessments of views from and to the viewing gap created to reciprocally link Almscliff Crag and Harewood House, to and from Harewood Castle and elsewhere, does not comply with the relevant paragraphs of the NPPF.

The bareground ZTV does not consider the important views of the RPG from the PROW (also a bridleway) that runs through the Park south-east to north-west from Wike Lane. The section from the Lodge to the Grey Stone provides spectacular views across the Park, with Harewood House itself and the south terrace garden standing clear and central in the view, against a background of deciduous trees that mark the route of the northern ha-ha. The view has been memorably captured by J.M.W. Turner and Thomas Girtin, among others. Walking the path from east to west suggested to us that in winter sections of the development site would be visible from this PROW.

The LVIA further fails to consider vistas from the RPG that are designed to take advantage of the prospect over Wharfedale. The Grove to the north of Harewood House is a designed ornamental woodland situated on the edge of the spur overlooking the valley. Access is enabled but controlled for conservation reasons to specific events and activities. The area contains an historic temple, from which radiates a series of designed vistas across lower Wharfedale, the principal view being towards Almscliff Crag. These vista avenues are clearly shown on this OS map: NLS site [View map: Ordnance Survey, Sheet SE 24/34 - Harewood - A edition - Ordnance Survey 1:25,000 maps of Great Britain, 1965-](#) .

There is another important vista at Mason's Gate, an historic track that sweeps north-west from the main drive at Harewood House across the ha-ha to a gate on the edge of the woodland, with a panorama across to Almscliff Crag. This vista is a key part of Harewood's plans for 'Healing the Landscape' when reinstating the lines of historic footpaths through the pleasure grounds to Mason's Gate.

Because the LVIA has critical omissions, applicant documents that derive their authority from it are similarly defective. The Glint and Glare Assessment acknowledges the national guidance that the two main impacts from solar arrays are visual amenity and glint and glare, and that properly designed sites can eliminate them. The

document does not assess the likely impact of visual amenity, nor of glint and glare, on any part of Harewood RPG. The Historic Environment Assessment fails to consider Harewood RPG, or any heritage assets inside the RPG. Para 208 of the NPPF requires that ‘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’.

Views into the RPG are not considered at any point. Although the LVIA looks at the impact of the development site on views from Almscliff Crag, acknowledging that there will be impacts even after 15 years, it considers views only in the sense of a general impact on a whole landscape. It does not address the precise impact on the RPG; nor does it consider the impact upon the designed vista through the tree belt to Harewood House itself. This is a reciprocal view to and from the House towards/from Almscliff Crag, and is a key eyecatcher in the Turner and Girtin landscape paintings. These are notable omissions; we believe that the significance of views of the RPG and Harewood House from Almscliff will be substantially impacted by the development site during its construction and for the full term of its operating life. Paragraph 213b of the NPPF applies:

‘Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification’.

We note that NY’s Landscape Architect has pointed out several omissions in the LVIA. In that context we question the LVIA’s practice of providing images taken at a height of 1.5 metres. National Health Service data show that the average height of adult males is about 1.75 metres, so half the adult population is taller than this. Horseback riders on the bridleways in the area will be taller still. The choice of image height by the LVIA seems hard to justify in relation to these data, especially when considering views closer to the development site.

Yours sincerely,
Chris Webb
Chair, YGT

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