

# Comments for Planning Application 18/02255/FUL

## Application Summary

Application Number: 18/02255/FUL

Address: Rowntree Park Lodge Richardson Street York YO23 1JU

Proposal: Alterations to existing Park Keeper's Lodge including removal of existing external fire escape stairs and blocking up first floor external door in connection with use as holiday let accommodation.

Case Officer: Tim Goodall

## Customer Details

Name: Dr David Fraser

Address: Fairfax House, 27 Castlegate, York YO1 9RN

## Comment Details

Commenter Type: Consultee response

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: York Civic Trust's Planning Committee considered this application at its meeting on 13 December 2018.

The Trust objects to this application due to:

1. Lack of consideration given to the heritage values of the site
2. Lack of justification and detail given in the application to the change of use

1. A lack of consideration given to the heritage values of the site

Frederick Rowntree designed Rowntree Park in 1921 on behalf of the Rowntree family, famed for their cocoa production and philanthropy in York. It is a memorial park to Rowntree cocoa workers who served in WWI and given to the people of York under the custodianship of what was known at the time as the Corporation of York (ie CYC). The Park has been nationally recognised as a Grade II listed Historic Park and Garden. The lychgate / dovecote and memorial gates into the Park from Terry Avenue are each listed as Grade II in their own right since early 2018. Furthermore, the attractive park keeper's lodge / café by Frederick Rowntree in his customary Arts and Crafts style is on the York Local Heritage List and consequently considered a non-designated heritage asset in the NPPF.

None of the heritage attributes of the Park or building have been fully considered in this

application. Externally, the removal of the modern fire exit stairs will require the blocking up of a first-storey door. Internally, the conversion of the upper floors into short-term holiday lets will result in the removal of a fireplace and chimney from the keeper's quarters on the first floor - the historic function of the building. Due to poor documentation, it is unclear if there will be any further loss of internal historic fabric and fittings (cornices? dado rails? mantelpieces? doors?), but any such loss would be irreversible and apparently go unrecorded.

The Trust is therefore dissatisfied that this is not being considered as a Listed Building Consent application, requiring the input of a Conservation Officer and the submission of a Heritage Statement. Failure to do so contradicts the NPPF (paras.189-90, 197, 199): 'In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting ... As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary' (para.189); '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' (para.190); 'The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application' (paras.197); 'Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible' (para.199).

## 2. Lack of justification and detail given in the application to the change of use

York Civic Trust does not object in principle to the partial change of use of the keeper's lodge to short-term holiday lets. More information on what this entails does however need to be provided. What will be the impact of this change of use on the security of the park? How will holiday residents access the park after hours when it is formally locked? Will the holiday residents have access to the amenities of the park out-of-hours? Who will be responsible for any out-of-hours security issues arising from vandals and trespassers etc, (as is a common occurrence)? Will external lighting be required? How will additional household waste be mitigated? Will there be any sound restrictions on holiday residents put in place? What parking provision will be provided for holiday residents? There is no disabled access to the holiday lets - how will this be mitigated for users? Are there any constraints over the types of use in/of the Park as stated in the Deeds when it was given to the Corporation of York in 1921, and if so how does this change of use conform to them? What provision has been made for users of the café aspect of the keeper's lodge during the change of use conversion / removal of asbestos?

These are considerations routinely addressed in planning applications through the use of a Design & Access Statement. In the case of this application, no Design & Access Statement is provided, only that it is stated that this is being considered a Minor Application. The Trust believes it is impossible to adequately assess the implications of the change of use of this non-designated heritage asset or on the wider Historic Park and Garden without the above questions being addressed, and it is unacceptable not to provide a Design & Access Statement or Heritage Statement; CYC should uphold standards in planning applications that affect its own assets just as it would expect of any other applicant.