

# Protecting Historic Parks and Gardens: Ingredients of a Planning Letter




[thegardenstrust.org](http://thegardenstrust.org)

 [@thegardenstrust](https://twitter.com/thegardenstrust)

A training presentation from the Gardens Trust.

This presentation talks us through the structure and process of writing a good planning application response letter.



**The Gardens Trust**  
70 Cowcross Street, London EC1M 6EJ  
Phone: (+44/0) 207 608 2409  
Email: enquiries@thegardenstrust.org

**Nationally designated planning application template response**

You may wish to use this template letter when commenting on a planning application that affects a historic park or garden that nationally designated on the Register of Parks and Gardens (Heritage List).

Items requiring amendment by the writer are presented in italics, with notes for your guidance in [ ], which will need deleting before completion. We have highlighted key words as a reminder that the ideal structure for a letter is SSIPP (Summary, Significance, Impact, Policy, Position).

\*\*\*\*\*

Date  
Head of Development Management  
Address  
*[mark for the attention of the case officer if you have the name]*

Dear Sir,

**19/xxx (application details)**

We are grateful for the opportunity to comment on this application, which has a material impact on the significance of *[give name of the park or garden]*, a historic designed landscape which is Registered by Historic England at Grade *[give grade - I, II\*, II]*. The inclusion of this site on the national register is a material consideration.

We write to *object/support/other stance* this application, which will *summarise impact in one sentence*.

Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to proposed development affecting a site listed by Historic England (HE) on their Register of Parks and Gardens as per the above application. The xxxx Gardens Trust (xGT) 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.

## Template letters

Comments on Application

If you would like to be notified of the decision outcome for this application then please ensure that you submit your e-mail address in the correct box below (as we cannot contact you without this information). Your e-mail address and telephone number (if you choose to add them) will not be represented a part of your consultation response.

Following the decision of this planning application, you may also be sent a short survey which will allow you to make us on our decision making process. Please note you will only receive this survey via e-mail, and only if you have provided a valid e-mail address in the relevant box below.

Please view the plans before commenting.

You can comment using the form below.

Please remember your comments will be made public, including your name and address.

You can find out more about:

- Your details being published
- Grounds for objection

on our [comments on applications \(opens in new window\) page](#).

Fields marked with \* are mandatory.

Application Details

Reference Number	19/2013/0821
Site Location	Land at Haringey Heathlands Horslow Park Road, Haver Road, Clarendon Road and the Kings Cross / East Coast Maze, London, UK

Your Details

Name*	
House Name/Number	
Street	
Village/Area	
Town	
County	
Postcode	
E-mail	


Nature of authorisation

Inform the Authority that you support the Planning Application.


Inform the Authority that you object to the Planning Application.

Inform the Authority that you do not object to the Planning Application.

Use provide the Authority with comments on the Planning Application.



thegardenstrust.org

 @thegardenstrust

The GT has template letters to take you through the structure for a letter relating to a Registered site, a locally designated site, and for sending a No Comment response. These letters follow the widely-approved SSIPP structure (Summary, Significance, Impact, Policy, Position), and we'll talk you through this now. By the way, we are referring to 'letters', but by this we can mean an emailed letter. Indeed, many planning consultations these days require comments to be made via an online form. This letter structure can and should be carried across to any medium.

**When writing comment letters on planning applications, try this SSIPP letter structure:**


**S**ummary  
**S**ignificance  
**I**mpact  
**P**olicy  
**P**osition



[thegardenstrust.org](http://thegardenstrust.org)



[@thegardenstrust](https://twitter.com/thegardenstrust)

Inspired by the mental image of 'SSIPP', we have been encouraged to think of writing a planning comment letter rather like building a cocktail. You'll see that this cocktail here has 5 elements (red liquid, orange liquid, fruit slice, ice, straw!), just like a planning letter. You add them carefully one by one, in proportionate measure and in the right order, and the result is an effective whole.



**Summary**

- Application reference (the local planning authority reference, and possibly also the Gardens Trust reference and your own)
- Proposal description (copy the text in the application form)
- Affected historic park or garden's designation
- About your CGT
- Your conclusion in one sentence


[thegardenstrust.org](http://thegardenstrust.org)
 @thegardenstrust

Start the cocktail by adding the fruit slice! This flags up what this cocktail is all about!

Start your comments with a summary of the application citing the reference number and also repeating the wording of the proposal (give the LPA ref, the GT ref, and your ref if you have one).

Also state the site's designation status. Eg for a site on the Register, this would be: 'We are grateful for the opportunity to comment on this application, which has a material impact on the significance of *[give name of the park or garden]*, a historic designed landscape which is Registered by Historic England at Grade *[give grade – I, II\*, II]*. The inclusion of this site on the national register is a material consideration.'

For a local site, this would be: 'We are grateful for the opportunity to comment on this application, which has a material impact on the significance of *[name the site]*, which is identified by us as of local importance, and contained within *the Trust's Local List of important parks and gardens*. *[Amend this as appropriate depending on how you describe your county's Unregistered sites of interest. Say if your List of Parks and Gardens has been accepted or adopted by the planning authority, or if the site has been incorporated into the County*

*HER]'*

Give your stance in one sentence, eg '*We write to object/support/other stance this application, which will [summarise impact in one sentence].'*

*Explain a little about your CGT and its relationship to the GT.*


*If the application relates to a Registered site, you might want to say: '[Add a short paragraph on your County Gardens Trust, and how it sees its role.]*

Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to proposed development affecting a site listed by Historic England (HE) on their Register of Parks and Gardens as per the above application. The xxxx Gardens Trust (xGT) 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.



For further information, we refer you to the Gardens Trust publication *The Planning System in England and the Protection of Historic Parks and Gardens* (2019), which is available online at [www.thegardenstrust.org](http://www.thegardenstrust.org)'

If the application relates to a locally important site, you might want to say: '*[Add a short paragraph on your County Gardens Trust, and how it sees its role. Mention that it is a member of the national Gardens Trust.]* For further information, we refer you to the Gardens Trust publication *The Planning System in England and the Protection of Historic Parks and Gardens* (2016), which is available online at [www.thegardenstrust.org](http://www.thegardenstrust.org)'

## Significance



- Describe the significance of the site (the listing entry may include a Statement of Significance, or ask your researchers if they are working on one)


thegardenstrust.org
 @thegardenstrust

Red liquid base stage of cocktail! The first of the two most fundamental parts of the cocktail and letter.


The next stage is to explain a little about the historic park or garden, as LPA staff are busy people and can't be expected to know this already. But this is not a matter of describing every detail of the site and its history in great detail. Rather, understanding sites today is all about 'Significance'. In other words, we need to be able to articulate what is really important about the site.

This articulation of Significance is required by the planning system. The National Planning Policy Framework requires applicants and those considering applications to be assessing whether the application affects the significance of a site, rather than simply physically alters the site. It's a way of ensuring that conservation is about managing change, rather than saying no to any change – it's a way of making sure that helpful change can go ahead, but poor change can be identified.

For example, the NPPF says that Local planning authorities should  
 NPPF 189 – 'require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting'

NPPF 190 – 'identify and assess the particular significance of any heritage asset

that may be affected by a proposal (including by development affecting setting of a heritage asset)



**Impact**

- State the proposal’s impact on the site’s significance
- Request further information if necessary
- Use impersonal tone - ‘XGT believes’ rather than ‘I believe’
- Remember our remit – conservation of historic parks and gardens
- The proposal can have many different impacts
- It can impact on many different aspects of the site
- Remember that there may be an impact on the Setting!
- Remember to consider whether this proposal may have a cumulative effect
- But remember that we are managing change, not preventing it

THE GARDENS TRUST [thegardenstrust.org](http://thegardenstrust.org) [@thegardenstrust](https://twitter.com/thegardenstrust)

Orange liquid stage of cocktail! The bulk of the cocktail.

This is where we state the proposal’s impact on the site’s significance – this section may be several paragraphs.

If you are struggling to reach a conclusion on the impact, it could be because the applicant has not given enough information on the significance and the impact on the significance. Do not be afraid to ask for more information if this is the case –

Remember to use an impersonal and measured tone, even if you care passionately about this case. Opinions will be taken more seriously if they are presented professionally.

Remember our remit – we are about conserving heritage assets, not about traffic management or school places.

Remember that the proposal can have many different impacts, and can impact on




many different aspects of the site. If this is the case, run through the impacts one by one.

Remember that there may be an impact on the Setting!

Remember to consider whether this proposal may have a cumulative effect

But remember that we are managing change, not preventing it – it is not reasonable to object to all planning applications that may change a historic park or garden



**THE  
GARDENS  
TRUST**

**Policy - national**

- Relate proposal to specific paragraphs of the National Planning Policy Framework.
- Say whether the proposal does or does not comply with the NPPF
- Handout with useful NPPF extracts is on Resource Hub
- Or try Para 195 – ‘Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent’
- For non-Registered sites, remember Para 194: Non-designated heritage assets of archaeological interest of equivalent significance to Scheduled Monuments, should be treated as designated assets.

[thegardenstrust.org](http://thegardenstrust.org)

[@thegardenstrust](https://twitter.com/thegardenstrust)

So now we are adding ice to the cocktail – giving it bite.

Relate proposal to specific paragraphs of the National Planning Policy Framework.

Say whether the proposal does or does not comply with the NPPF

Handout with useful NPPF extracts is on Resource Hub

Or try – ‘Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent’

For non-Registered sites, remember that, tucked away in a footnote to Para 194, is:

Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.

## Policy - local



- Find the Local Plan of the local planning authority relating to your application.
- Look for the section that deals with the historic environment and pull out relevant policies or paragraphs, especially ones relating to historic parks and gardens.
- Quote the policy and say how the application relates to the Local Plan.




[thegardenstrust.org](http://thegardenstrust.org)

[@thegardenstrust](https://twitter.com/thegardenstrust)

Locally, Local Plan policy/ies [*say what the policy is, and from which version of which document it comes*] is relevant to this proposal. [*Explain how the proposal does or does not comply with the Local Plan policy.*]

Every local authority has a Local Plan, against which planning decisions for a certain time period are made. Just as with national policy, you need to find the relevant Local Plan (look on the website for the local planning authority involved), and trawl through to find the section which deals with the historic environment, and then pull out paragraphs to quote in relation to your application (ie ones that it ought to comply with).

If space is tight, you can simply refer to a Paragraph or Policy number, rather than repeating it in full.



### Position

- Conclude by clearly stating your position – object, support, support with conditions.
- Include a brief sentence as to why you've come to that conclusion.

THE GARDENS TRUST [thegardenstrust.org](http://thegardenstrust.org) [@thegardenstrust](https://twitter.com/thegardenstrust)

Finally, let's make it easy to drink this cocktail by adding the straws.

This is where we make it simple for the busy planner to see at a glance exactly what your position is, with a statement as to whether you object or approve, or have a different stance.

Clearly state whether you are objecting or supporting, or taking another stance, and summarise why, without repeating the impact paragraphs. 'To conclude, the XGT wishes to object to this application, because...'

## **Time to wrap it up!**

- Express willingness to speak at Planning Committee.
- Ask to be kept informed.
- Get someone in an official capacity to sign the letter, ideally Chair or Secretary.

***A good letter is a  
gift to the decision  
makers***



[thegardenstrust.org](http://thegardenstrust.org)

[@thegardenstrust](https://twitter.com/thegardenstrust)

Finish the letter by expressing willingness to speak at Planning Committee, and by asking for the Ipa to keep you informed.

Make sure the letter is signed by someone in an official CGT capacity rather than simply your name, ideally the Chair or Secretary to show that there has been a sign-off process.

Please send a copy of your comments for the  
Gardens Trust Casework Log via:

**conservation@thegardenstrust.org**



[thegardenstrust.org](http://thegardenstrust.org)

 [@thegardenstrust](https://twitter.com/thegardenstrust)

Very last of all, do remember to send a copy of your comments to the GT casework manager, so that it can be added to the Log. This is a unique national database going back to year 2000 – invaluable record of planning threats, but also of precedent and useful wordings other people have tried. We are working to open up access to the Log for CGTs so you will find it invaluable, but the more information on there, the more useful it will be.



@thegardenstrust



@thegardenstrust



[www.thegardenstrust.org](http://www.thegardenstrust.org)

*All materials produced by The Gardens Trust and its predecessor organisations are available for free download and reuse for non-commercial purposes.*

*All such materials are subject to the © copyright of The Gardens Trust and may not be used for any commercial purpose without the permission of The Gardens Trust.*



[thegardenstrust.org](http://thegardenstrust.org)

 [@thegardenstrust](https://twitter.com/thegardenstrust)