

28th April 2025

To Whom It May Concern ,

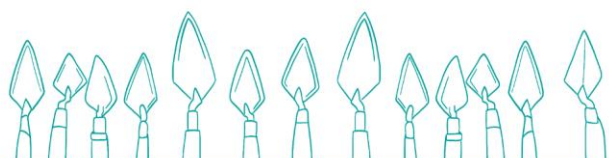
Re: The threat to the Gardens Trust's role as a statutory consultee

The Council for British Archaeology (CBA) collaborate with the Gardens Trust as fellow members of the Joint Committee of National Amenity Societies (JCNAS). Through this relationship we know them to provide expert advice, free at the point of need, on planning applications with potential impacts on the special interest of Registered Parks and Gardens (RPGs). It is in this capacity that I write to you regarding proposals to remove their role as a statutory consultee within the planning system.

The CBA broadly support the Government's proposals to streamline the planning system; reducing inefficiencies and improving the speed of decision making. However, it is important this does not come at the unintended cost of the quality of decision making. Good decision making will always entail balancing a raft of considerations to maximise public benefit outcomes whilst best delivering sustainable development. The expertise of statutory consultees and notifyees is built into the planning system to ensure decisions are reached with a comprehensive understanding of all relevant considerations.

We agree that an increased emphasis on a 'plan led' strategic planning system, informed by well-constructed guidance, as set out in the Planning and Infrastructure Bill, will help facilitate efficiencies as well as consistency in decision making. Historic England collate excellent guidance, which supports well managed change to the historic environment. In an ideal world this would result in well considered, balanced applications with optimised public benefits and minimised harmful impacts. Experience shows this not always the case. Of the 85 objections made by the Gardens Trust to planning applications last year, nearly 20% were related to a lack of information and fundamental concerns about compliance with national planning policy and legislation¹. Consultee objections are rarely to the principle of development but rather specific aspects of proposals that require revision to align with policy requirements and to best conserve the significance of the heritage asset.

¹ In 2024-25 financial year, the Gardens Trust received **1849 consultations**. They made **1289 responses**. **372 were bespoke, detailed responses of advice**, and **85 of these were objections** to the proposals – **4.6%**. At least 16 of these objections were due to a lack of necessary information. All objections related to fundamental concerns about compliance with national planning policy and legislation.



Council for British Archaeology

The Gardens Trust is a small organisation of experts in the special interest found in designed landscapes, parks, gardens and historic urban cemeteries. It is a rare specialism that local authority planning teams do not have the capacity to accommodate in their specialist services (conservation officers, archaeologists, ecologists, etc). As a result, the Gardens Trust's advice adds additional understanding to decision making factors. Data, shared by the Gardens Trust on their consultation numbers and responses demonstrate that they respond in a timely manner, offer constructive pragmatic advice and object only in a tiny minority of cases². The idea that the Gardens Trust are 'blockers' to development is simply not true.

NPPF, paragraph 8, establishes that the social objective of sustainable development is to foster "well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being." The environmental objective of sustainable development is "to protect and enhance our natural, built and historic environment." Both these objectives are at the heart of the Gardens Trust's planning advice. Their statutory work is supported by the knowledge and enthusiasm of local voluntary groups across the country in the form of 36 local volunteer County Garden Trusts in England. These are local voices with expertise, engaged with the management of change in their local areas.

We urge the government in their review of statutory consultees to recognise the invaluable contribution the Gardens Trust make to achieving sustainable development and not to misconstrue the presentation of expert advice as a spare part to good planning. A statutory consultee that advises on managing change to highly valued green spaces, supporting capacity constraints of planning authorities across the country should be recognised as a valuable component of a well-tuned planning system.

Yours Sincerely,



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Executive Director

*As a dyslexic person, occasional English errors may pass me unnoticed.
Please accept my apology if any appear in this letter.*

The Council for British Archaeology (CBA) is a charity committed to making archaeology accessible to anyone interested in exploring the stories of people and place. As the voice of archaeology in the UK we bring together community groups, commercial units, academics and heritage organisations to create and share opportunities to participate, discover and be inspired by archaeology.

² Ibid.

