



# YORKSHIRE GARDENS TRUST

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Chair: Chris Webb

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

## Response to consultation on the Planning for the Future White Paper

We are grateful for the opportunity to contribute to the important topic of planning reform. In making our response we wish to endorse the response by our sister charity, The Gardens Trust, to emphasise and amplify the points in The Gardens Trust's response, and to make some additional points that are important in our experience with planning in Yorkshire.

1. The white paper does not appear to acknowledge that without properly resourced planning departments effective and sustainable planning is not possible, so that any reform will be tinkering at the edges of a national problem. In our county there are 126 registered parks and gardens, one of which, Studley Royal, has World Heritage site status. Planning departments in Yorkshire require expertise in the particular challenges of working with these landscapes, but planning authorities throughout Yorkshire are understaffed, and lack appropriate expertise to deal with sensitive and complicated matters in relation to designed landscapes, parks and gardens. Thus, many planning authorities in Yorkshire either do not have a conservation officer, or have just one officer working part-time.

2. The current system of registration for designed landscapes, parks and gardens does little more than recognise their importance; unlike the system for listed buildings, there is no statutory protection for these landscapes. We can see nothing in the white paper to address this anomalous and deplorable position.

3. Wellbeing, climate change, biodiversity and sustainability are critical considerations for our nation in the short and long term. Unless our designed landscapes, parks and gardens, and access to them, are protected, the effectiveness of designed landscapes, parks and gardens will diminish and decay. They are relatively inexpensive to maintain and improve, but easy to damage. The white paper should place more emphasis on these aspects of planning, and acknowledge that expert planning resources, locally based, are required to realise the potential of these landscapes.

4. The proposition to assign land to the three groupings is seriously flawed. The beauty of the UK landscape and its towns is ineluctably connected to variety and difference. The mosaic of gardens, buildings, streets and parks that has developed over centuries is an immensely precious asset that brings joy to our lives and visitors to our shores; in our county, York is a world-famous example of how successful and attractive such a mosaic is – but we do not wish it to be fossilised. Its preservation and enhancement depend on local knowledge and engagement developed and sustained over time; the present proposals to create groups or area designations will prevent the mosaic from growing and changing sensitively and appropriately, carrying a high risk of creating areas that are doomed to be preserved as museums rather than living, breathing, growing places that people care for and wish to live in and visit. There is a closely related danger that ill-considered developments, even small ones, will gradually erode on a cumulative basis the precious qualities of our parks, gardens and green spaces.

5. We understand that the white paper provides for Protected Areas (including established designations such as green belt, AONB, conservation areas) to remain subject to existing policy considerations. But these occupy a small part of the country, while many historic parks and gardens do not lie in Protected Areas. It is important that fast-tracking is not applied to designed landscapes, parks and gardens wherever they might be in the proposed areas; and that individual assessments of applications affecting designed landscapes, parks and gardens are maintained and improved.

6. The question of boundaries between these proposed areas is not properly explored. Boundaries for designed landscapes, parks and gardens are critical to their appreciation and value; it must be recognised that the wider setting and broad visual envelope of such landscapes are important factors in their design, which contribute immeasurably to the many ways in which they are enjoyed now, and in the future. Area designations must allow the consideration of hard and soft boundaries, where parks might blend into agricultural landscapes, or urban or semi-urban settlements. The success of boundaries depends on individual assessments, and cannot possibly be achieved within the proposed timescale for designating the three areas. Moreover, if the white paper is to be successful in improving the planning system, it needs to recognise the importance of, and provide for, change over time. It must also acknowledge that new knowledge and new appreciation of landscapes are acts of continuous creation, as in the very recent additions to the Listings of twenty significant Post-War Landscapes in England.

7. The proposal to allow designated experts to judge their own work is dangerous. Handing over decisions without scrutiny to experts who might not understand local significance (or, indeed, national significance) will lead to poor design and inappropriate intervention. Moreover, it threatens to undermine and ignore the considerable amateur expertise in the population at large (built up over long periods with much effort and expense), and not least in public benefit charities such as our own. Co-creation, pre-application co-operation and neighbourly discussion have good records in creating designs that are owned and appreciated by the public. It is wrongheaded to consider this process as delay; it is rather a process that increases the likelihood of getting designs right, and therefore sustainable into the future. It is important that the new system adopts a plurality of ways (including physical signs) to alert people to applications for planning permission.

8. Yorkshire's National Parks require special consideration and support in planning matters relating to designed landscapes, parks and gardens. Yorkshire Gardens Trust has assisted our National Parks through our research and recording programme (run, led and financed at no cost to the public purse), which has enhanced their understanding of the historic parks and gardens within their boundaries. We also advise on planning matters that affect historic parks and gardens in these National Parks. We are concerned that the white paper pays insufficient regard to the particular problems of these special areas. In particular, we fear that National Parks could lose control over where properties are built, and that this will have a damaging affect on the character of the Parks themselves, and on historic parks and gardens and their settings.

9. Beauty is an elusive and evanescent characteristic to deploy as a planning tool. It carries with it a high risk of privileging sight over the other senses (it is folly to ignore scent, touch and hearing in connection with gardens), and over other characteristics (including, among others, association with historical events or figures, intellectual rigour, and significance in demonstrating new ways of approaching, appreciating and designing landscapes). Beauty is also highly subjective and changes over time, even so short a time as a generation, let alone over centuries.

10. Detail – whether it be a planting scheme in a single bed or the material chosen for a path or a structure – is critical to the big picture. Mosaics of landscape and townscape are constructed of individual tesserae, all of which need to be understood and approached with care; that cannot be achieved in a lasting way in a single 30-month period.

11. We do not wish to oppose reform of the planning system root and branch; there are improvements that can be made, and we understand and support the drive to build homes. But wholesale reform over so short a period is doomed to failure if it does not carry with it the need to enhance local engagement in the development and growth of local areas. We urge, therefore, a more considered approach, which is less driven by theory and more by data, by practical appreciation of what there is to be gained, and what there is to be lost.

12. We are pleased to note that the white paper acknowledges that street trees are to be an important feature of future planning, as exemplified by the success and importance of the community-led campaign in Sheffield to prevent the City Council from removing healthy trees from its streets. We also note that the creation of new parks and green spaces will be important to health, wellbeing and the public realm in developments in town and city centres, and that, as with trees, future planning processes should be clear on this point.

13. We support the proposal that each planning authority will have a chief officer for design and place-making. In that connection, we support the proposal that design codes should 'be prepared locally and ... be based on genuine community involvement rather than meaningless consultation'.

#### Contact information

Chris Webb, Chair, Yorkshire Gardens Trust  
pureycust@gmail.com