



Heritage Assets – Planning Guidance Note

Contents

1. **Introduction**
2. **What is a heritage asset?** – designated and non-designated heritage assets
3. **Planning status and treatment of heritage assets** – national and local planning policy and guidance
4. **Checklist of considerations when assessing a planning application affecting a non-designated heritage asset**
5. **New Forest National Park list of non-designated heritage assets** – assessment criteria, processes and procedures for addition or removal from the list
6. **New Forest Cottage** – case study New Forest non-designated heritage asset
7. **Conclusion**

1. Introduction

- 1.1. The National Park Authority's first statutory purpose is to conserve and enhance the natural beauty, wildlife and cultural heritage of the New Forest. Cultural heritage includes the historic environment of the National Park. The planning process is a key mechanism by which the historic and built environment of the New Forest is conserved and enhanced, ensuring new development is sympathetic and in keeping with the character of the Forest, and promoting high quality design. As the strategic and local planning authority for the New Forest, the National Park Authority should consider the desirability of sustaining and enhancing the significance of all heritage assets when determining applications.
- 1.2. However, the National Park Authority recognises that there is some confusion regarding what constitutes a heritage asset, and in particular the status and appropriate treatment of non-designated heritage assets within the planning system.
- 1.3. This briefing note clarifies the difference between designated and non-designated heritage assets, and explains the existing national and local policy and guidance on how they are both to be treated within the planning system. The note also explains how the Authority has identified non-designated heritage assets within the National Park, where this information is published, and the processes for adding new assets to the 'local list' or requesting the removal of an asset from the list.

2. What is a heritage asset?

- 2.1. The NPPF (2019) defines heritage assets as ‘buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. They include designated heritage assets and assets identified by the local planning authority (including local listing)’. Heritage interest and value is derived from a wide range of characteristics associated with an asset that taken together form the overall significance of an asset. These include but are not limited to:

Age and rarity	Older assets, with fewer surviving examples of its kind, often have great heritage interest and value. The importance of age to an asset's overall significance can be adjusted to take into account distinctive local characteristics.
Representivity	Typical, well-preserved examples of a particular historical asset type, as judged against local characteristics, have heritage interest and value.
Aesthetic value	The intrinsic design merits of an asset.
Group value	Groups of assets with a clear or significant visual, design or historic relationship.
Archaeological potential	An area that holds, or potentially holds, evidence of past human activity worthy of expert investigation. Heritage assets with archaeological interest are the primary source of evidence about the evolution of places, and of the people and cultures that made them.
Historic value	An asset that illustrates important aspects of the nation's social, economic, cultural, or military history and/or has close historical associations with nationally important people.
Evidential value	Significant contemporary or historic records that supplement and enhance the historic and archaeological interest of an asset.
Designated landscapes	The interest attached to locally important designed landscapes, parks and gardens.
Landmark status	An asset with strong communal or historical associations, or an especially striking aesthetic value, that is identified as a landmark within the local scene.
Social and communal value	Assets perceived as a source of local identity, distinctiveness, social interaction and unity often residing in intangible aspects of heritage contributing to the “collective memory” of a place.

Table 1: Characteristics of heritage value and interest

- 2.2. **Designated heritage assets** are World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites, Registered Parks and Gardens, Registered Battlefields and Conservation Areas. Normally referred to as ‘Listed’ buildings and sites, they have been given formal status and legal protection under the relevant legislation to sustain their value and heritage interest. They are normally selected for statutory designation because they are of special heritage interest and value, and are nationally significant.
- 2.3. **Non-designated heritage assets** are those that have been identified by local planning authorities as having a degree of significance meriting consideration in planning decisions, but which have either not yet been considered for statutory listing, do not meet the necessary criteria, or are not of such special heritage significance to qualify for statutory designation. In the New Forest National Park they have been called assets of local, vernacular and cultural interest, ‘locally listed’ or ‘black buildings’, but in national legislation and policy guidance (e.g. the NPPF) they are known as ‘non-designated heritage assets’.

3. Planning status and treatment of Heritage Assets

- 3.1. Designated heritage assets are protected by specific legislation that applies certain additional planning controls on building works affecting them, including development, alteration and demolition, to preserve their heritage interest.
- 3.2. Section 16 of the NPPF (2019), stipulates that the National Park Authority should take into account the desirability of sustaining and enhancing the significance of all heritage assets (including non-designated heritage assets, hereafter referred to as locally listed buildings or sites) when determining planning applications. Therefore, conserving the heritage interest, character and appearance of a locally listed building or site is a material consideration in assessing planning applications. The level of consideration and weight given to the preservation of a locally listed building or site should be proportionate to the asset's significance.
- 3.3. The adopted New Forest National Park Local Plan (2019) policies reinforce the Authority's commitment to its strategic objective to conserve and enhance the cultural heritage and historic environment of the National Park, especially the wealth of individual characteristics that contribute to its local distinctiveness. Policy SP16 (The historic and built environment) states:

'Proposals should protect, maintain or enhance nationally, regionally and locally important sites and features of the historic and built environment, including local vernacular buildings, archaeological sites and designed and historic landscapes, and, where appropriate, help secure a sustainable future for those heritage assets at risk.'

a) Proposals will be supported where they conserve and enhance the significance or special interest of designated or non-designated heritage assets...'

- 3.4. The adopted Local Plan also includes further safeguards for certain non-designated heritage assets. Policy DP35: Replacement dwellings states,
'The replacement of existing dwellings will be permitted except where the existing dwelling...:

b) makes a positive contribution to the historic character and appearance of the locality.'

- 3.5. Consequently, proposals which are considered to be damaging to the structural integrity of a locally listed building, which could result in the loss of significant elements of historic fabric, will be resisted. Any works that involve substantial alterations to structural elements including walls, roof, floors, or staircases, should be supported by a recent structural engineer's report and demolition plan. These should set out how the works will be undertaken with best practice methods to protect the historic fabric of the asset and prevent structural failure.

4. Considerations when assessing the suitability of planning applications, which affect locally listed buildings or sites

- 4.1. Each planning application is considered on its own merits. However, when assessing proposals affecting locally listed buildings or sites the National Park Authority will consider the following matters and would encourage applicants and consultees to do likewise.

- ☐ Identify which values and aspects of heritage interest contribute to the significance of the locally listed building or site (age; rarity; aesthetic interest; group value; archaeological interest; evidential value, historic association; designed landscape interest; landmark status; and social and communal value).

- ☐ Consider what the impacts of the proposals are on those values and aspects of heritage interest.
 - ☐ Do the proposals harm, better reveal or enhance the assets heritage value and interest? What is the extent of the impact?
 - ☐ Is the harm caused substantial harm - that is the serious or extensive, often irreversible, damage, deterioration, or loss of an important element of an asset's heritage value and interest? Or less than substantial harm - that is some damage, deterioration, or loss of an element of an asset's heritage value and interest?
 - ☐ Will the proposals result in the substantial loss of historic fabric and/or harm the structural integrity of the heritage asset?
 - ☐ If any harm will be caused, is this clearly and convincingly justified?
 - ☐ What are the public benefits of the proposal, and do they outweigh the harm caused?
 - ☐ Has the extent of the harm caused been minimised and mitigated as much as reasonably practicable?
 - ☐ Are the proposals reversible?
 - ☐ Do the proposals aspire to a quality of design and execution, which may be valued now and, in the future, and are befitting its setting in a National Park?
- 4.2. These considerations are similar to those applied to listed building applications, which reflects the importance attached to locally listed buildings and sites, at both a national and a local scale.

5. The New Forest National Park list of non-designated heritage assets

- 5.1. Historic England encourages Local Authorities to compile a 'local list' of non-designated heritage assets as a consistent and accountable way of identifying locally listed buildings and sites, applying national and local policies and giving them the appropriate degree of consideration in planning decisions.
- 5.2. The New Forest National Park Authority identifies locally listed buildings and sites using the characteristics listed in Table 1 as criteria to assess whether an asset has a degree of significance that merits consideration in planning decisions. Any one or a combination of the characteristics could provide the basis for including an asset on the local list.
- 5.3. At present most of the locally listed buildings and sites included by the Authority on the local list are within Conservation Areas. They were identified as part of the program of Conservation Area Appraisals conducted in 2008-09 in consultation with the local communities. These assets have been publicly identified, highlighted in black, on the 'search my property map' accessible via our website planning page (<https://www.newforestnpa.gov.uk/planning/>).
- 5.4. Outside Conservation Areas, locally listed buildings and sites have continued to be identified reactively in response to planning applications. At present these assets have not been highlighted on our online maps, and the Building Design and Conservation team are currently working to make this information publicly available on the online maps.
- 5.5. All the locally listed buildings and sites that have been identified so far have been compiled into a list by parish, which has been published on our website planning page ([here](#)). If a building, monument, site, or landscape does not appear in the local list, it does not necessarily mean that it has no heritage value

meriting consideration in planning decisions, rather the asset may not currently meet the selection criteria for inclusion on the list, or it may not have yet been identified as meriting inclusion in the list.

- 5.6. The local list is regularly being updated as assets are brought to our attention. When assets are brought to our attention either in response to a planning application or enquiry, or in response to a recommendation by a community group, the Building Design and Conservation team will assess whether the asset merits inclusion on the list against the characteristics listed in Table 1. If an asset is deemed to merit inclusion the National Park Authority will inform the property owners in writing that the asset has been added to the list.
- 5.7. There may be exceptional circumstances where there is justification to appeal against the inclusion of an asset in the local list, or to request the removal of an asset from the list. If an asset arguably does not warrant inclusion on the list of non-designated heritage assets, a request can be made for it to be omitted from the list. The process was agreed by the Authority in 2012 and is as follows:
- ☐ The request should be submitted in writing to building.conservation@newforestnpa.gov.uk, explaining why it is considered that the asset does not meet the criteria for inclusion on the list - that is how the asset does not exhibit the characteristics of heritage significance set out in Table 1.
 - ☐ The Executive Director of Strategy and Planning, and the Building Conservation Officer will reassess the asset against the criteria.
 - ☐ The final decision will then be made in consultation with the Chair or Vice-Chair of the Planning Committee. The property owner will be informed in writing of the decision outcome.
- 5.8. At present the local list largely consists of buildings. However in accordance with the NPPF's definition of heritage assets, and recognition of the fact that all types of asset including monuments, sites, places, areas or landscapes, positively contribute to the character, appearance and heritage of the New Forest, all assets types will be considered for inclusion when they are brought to our attention in future.
- 5.9. So far, the Authority has identified in excess of 1700 locally listed buildings and sites. Collectively and individually these locally listed buildings and sites make a significant positive contribution to the character and appearance of the New Forest National Park and its individual villages. In most villages, normally only a handful of buildings are statutorily listed, so the loss of locally listed buildings and sites would greatly erode the character and appearance of the local area. Therefore, the Building Design and Conservation team will continue to update and enhance the local list as more assets are identified both within and outside the Conservation Areas.

6. Case Study – the New Forest Cottage

- 6.1. Numerous examples of typical late mid-19th to early-20th century New Forest Cottages have been identified as locally listed buildings through the Conservation Area Character Appraisals, preparation of Village Design Statements and the consideration of individual planning applications. These cottages make a significant contribution to the character, appearance, and cultural heritage of the National Park. They represent the ongoing practice of Enclosure that shaped modern rural Britain, as well as the influence of the post industrial revolution on the local vernacular, small, one-storey, linear cottages of the Forest. Their construction coincided with the growth of the railway network,

and the availability of alternative cheap materials, such as slate.

- 6.2. These detached cottages are characterised by their symmetrical, three bay frontage; central porch; red brick, stretcher bond construction; slate or tile, single-pile, gable roof; chimneystacks at each gable end; and shallow foundations. The linear floor plan usually consists of two ground floor rooms, with a central staircase and two first-floor bedrooms above. Later examples might have a contemporary two-storey rear wing, creating T-shaped floor plan. This classic, simple cottage design and modest character is a recognisable and significant feature of the New Forest vernacular.



- 6.3. Many New Forest Cottages present gable end to the street, separated from the road by low hedges or walls, and some are set well back in their plots.
- 6.4. The value of these cottages is rooted in their historic context, design and construction. Unfortunately, many of these cottages are under threat from, neglect, unsympathetic extension or redevelopment. If these cottages are lost The Forest, and every village within it, faces being stripped of much of its special character, so the Authority actively seeks their retention in line with the national and local planning policy.
- 6.5. The New Forest Cottage represents only one type of locally listed building in the National Park. Other types of buildings and sites of local, vernacular, and cultural interest are also at risk of neglect, unsympathetic extension or redevelopment, including agricultural buildings, cob cottages, and estate cottages. As with the New Forest Cottage, the Authority will actively seek the conservation and enhancement of all locally listed buildings and sites. Further details on other types of locally listed buildings and sites can be found in the National Park Design Guide and the Conservation Area Character Appraisals.

7. Conclusion

- 7.1. All heritage assets, whether designated or non-designated, have a recognised degree of significance meriting weight as a material consideration in planning decisions. Designated heritage assets receive legal protection, which impose additional planning restrictions. Non-designated heritage assets (locally listed buildings or sites) are considered to have a degree of heritage significance meriting consideration in planning decisions; the desirability of their conservation is a material consideration, in accordance with national and local planning policy and guidance. In order to aid the assessment of planning applications affecting locally listed buildings and sites, some points to consider have been provided above.
- 7.2. The Authority has already identified a significant number of locally listed buildings and sites through the Conservation Character Area Appraisals and in

response to planning applications. The assets that have been identified have been published in a list by parish on our website and are also highlighted in black on the online 'search my property map'. The Building Design and Conservation team will periodically update the local list as more assets are identified.

December 2020

Contacts:

If you have any questions about the contents of this document, please email:

building.conservation@newforestnpa.gov.uk

Key References

'Section 16' of *NPPF* (2019), Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

'Conserving and Enhancing the Historic Environment' of *NPPG*, Available at:

<https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment#designated-heritage-assets>

Conservation Principles, Policy and Guidance, Historic England (2008), Available at

<https://historicengland.org.uk/images-books/publications/conservation-principles-sustainable-management-historic-environment/conservationprinciplespoliciesandguidanceapril08web/>

Heritage Definitions, Historic England, Available at:

<https://historicengland.org.uk/advice/hpg/hpr-definitions/>

Local Heritage Listing, Historic England Advice Note 7, Historic England (2016),

Available at: <https://historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/heag018-local-heritage-listing/>

Policies DP2 (General Development Principles), SP16 (Historic & Built Environment), SP17 (Local Distinctiveness), DP18 (Design Principles), DP35 (Replacement dwellings) of the *New Forest National Park Authority Local Plan 2016 - 2036*

(Adopted 2019), Available at: <https://www.newforestnpa.gov.uk/planning/local-plan/>

PROTECT Objectives 2 and 3 of the *New Forest National Park Business Plan 2018-*

2021, Available at: <https://www.newforestnpa.gov.uk/about-us/business-plan/>