

# **Heritage Assets - Planning Guidance Note**

#### **Contents**

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

_	_			
/	(,,	nclu	ICIA	ne
			JOIL	1115

\_\_\_\_\_

### 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 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 offers an overview of 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 identifies non-designated heritage assets within the National Park, where this information is published, and the processes for adding new locally listed heritage assets to the 'local list' or requesting the removal of an asset from the list.

## 2. What is a heritage asset?

- 2.1. The National Planning Policy Framework (NPPF, 2021) defines a heritage asset as, '...a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).' The NPPF confirms that heritage assets are an 'irreplaceable resource' and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations (paragraph 189).
- 2.2. Local heritage interest and value is derived from a wide range of characteristics associated with a heritage asset that taken together form the overall significance of an asset. These include but are not limited to:

Asset Type	Although local heritage lists have long been developed successfully for buildings, all heritage asset types, including monuments, sites, places, areas, parks, gardens and designed landscapes may be considered for inclusion
Age	The age of an asset may be an important criterion, and the age range can be adjusted to take into account distinctive local characteristics or building traditions
Rarity	Appropriate for all assets, as judged against local characteristics.
Architectural & Artistic Interest	The intrinsic design and aesthetic value of an asset relating to local and/or national styles, materials, construction and craft techniques, or any other distinctive characteristics
Group Value	Groupings of assets with a clear visual design or historic relationship.
Archaeological Interest	The local heritage asset may provide evidence about past human activity in the locality, which may be in the form of buried remains, but may also be revealed in the structure of buildings or in a designed landscape, for instance. Heritage assets with archaeological interest are primary sources of evidence about the substance and evolution of places, and of the people and cultures that made them.
Historic Interest	A significant historical association of local or national note, including links to important local figures, may enhance the significance of a heritage asset. Blue Plaque and similar schemes may be relevant. Social and communal interest may be regarded as a sub-set of historic interest but has special value in local listing. As noted in the PPG: 'Heritage assets can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity'. It therefore relates to places perceived as a source of local identity, distinctiveness, social interaction and coherence, contributing to the 'collective memory' of a place.
Landmark status	An asset with strong communal or historical associations, or because it has especially striking aesthetic value, may be singled out as a landmark within the local scene.

Table 1: Commonly applied selection criteria for assessing the suitability of assets for inclusion in a local heritage list (taken from Local Heritage Listing: Identifying and Conserving Local Heritage - Historic England Advice Note 7 (2021 2<sup>nd</sup> edition)

- 2.3. Designated heritage assets are World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites, Registered Parks and Gardens, Registered Battlefields and Conservation Areas. 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.
- 2.4. Non-designated heritage assets are those identified by local planning authorities as having a degree of heritage significance meriting consideration in planning decisions, but which have either not yet been considered for statutory designation, do not meet the necessary criteria, or are not of such special heritage significance to qualify for statutory designation at a national level. In the New Forest National Park this includes assets which have been called assets of local, vernacular and cultural interest, 'locally listed' or 'black buildings'.

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

- 3.1. 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. The local list should not be taken as a complete and exhaustive list of non-designated heritage assets locally, and reference should also be made to the Historic Environment Record.
- 3.2. The New Forest National Park Authority identifies locally listed heritage assets 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.
- 3.3. In the past, the focus of the local list has been on buildings and at present most of the locally listed heritage assets 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 and highlighted in black on the 'search my property map' accessible via our website planning page (https://www.newforestnpa.gov.uk/planning).
- 3.4. Outside Conservation Areas, locally listed heritage assets 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 & Conservation team are currently working to make this information publicly available on the online maps.
- 3.5. All the locally listed heritage assets which have been identified so far have been compiled into a list by parish, which has been published on our planning webpagepage (here). If a building, monument, site, or landscape does not appear in the local list, it should not be assumed 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. The Historic Environment Record should also be consulted.

- 3.6. 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, in collaboration with other specialists where required, 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.
- 3.7. 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 local list of 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, and consult with the relevant specialists where required.
  - 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.
- 3.8. 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.
- 3.9. So far, the Authority has identified in excess of 1,700 locally listed heritage assets. Collectively and individually these locally listed assets make a significant positive contribution to the character and appearance of the New Forest National Park and its individual villages. For example, in most villages only a handful of buildings are statutorily listed, so the loss of locally listed heritage assets would greatly erode the character and appearance of the local area. Therefore, the Authority will continue to update and enhance the local list as more assets are identified both within and outside the Conservation Areas.

### 4. Planning status and treatment of Heritage Assets

- 4.1. 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.
- 4.2. Section 16 of the NPPF stipulates that the National Park Authority should take into account the desirability of sustaining and enhancing the significance of <u>all</u> heritage assets when determining planning applications. Therefore, conserving

the heritage interest, character and appearance of locally listed heritage assets is a material consideration in assessing planning applications. The level of consideration and weight given to their preservation should be proportionate to the asset's significance.

4.3. 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...'
- 4.4. The adopted Local Plan also includes further safeguards for certain locally listed heritage assets. Policy DP35: Replacement dwellings states,

The replacement of existing dwellings will be permitted <u>except</u> where the existing dwelling...:

- b) makes a positive contribution to the historic character and appearance of the locality.'
- 4.5 Consequently, proposals which are considered to be damaging to the structural integrity of a locally listed heritage asset, 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.
- 5. Considerations when assessing the suitability of planning applications, which affect locally listed heritage assets
- 5.1. Each planning application is considered on its own merits. However, when assessing proposals affecting locally listed heritage assets 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 heritage asset (Asset type; Age; Rarity; Architectural & Artistic interest Group value; Archaeological interest; Historic Interest; or Landmark status).
  - 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 asset's 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?
- 5.2. These considerations are similar to those applied to applications affecting designated heritage assets such as listed buildings, which reflects the importance attached to locally listed heritage assets, at both a national and a local level.
- 5.3. For non-designated heritage assets which have not, or not yet, been locally listed, the same considerations will apply when assessing proposals affecting them.

# 6. Case Study – the New Forest Cottage

- 6.1. Numerous examples of typical late mid-19<sup>th</sup> to early-20<sup>th</sup> century New Forest Cottages have been identified as locally listed heritage assets 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 New 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 heritage asset in the National Park. Other types of buildings 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 some other types of locally listed heritage assets can be found in the National Park Design Guide and the Conservation Area Character Appraisals.

#### 7. Conclusions

- 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 protections, which impose additional planning restrictions. Non-designated heritage assets (which include locally listed assets) are also 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 heritage assets, some points to consider have been provided above.
- 7.2. The Authority has already identified a significant number of locally listed heritage assets 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 Authority will periodically update the local list as more assets are identified. Further assistance in identifying non-designated heritage assets which are not locally listed can be found by looking at the Historic Environment Record. Search the Hampshire Historic Environment Record online here.

#### 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 (2021), 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/