WEST NORTHAMPTONSHIRE COUNCIL PLANNING POLICY COMMITTEE

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Report Title	West Northamptonshire Local Heritage List
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List of Appendices

Appendix A – Draft Local Heritage List Criteria

1.   Purpose of Report

To adopt the suggested Local Heritage List Criteria (Appendix A), endorse the former Northampton and Daventry Local List assets, and agree the process for identifying and adopting new heritage assets onto the list.

2.   Executive Summary

2.0   The report sets out the recommendations for the adoption of the suggested Local Heritage List criteria for the whole of West Northamptonshire, as set out in Appendix

A, as well as the endorsement of heritage assets previously identified by Northampton Borough Council and Daventry District Council, and the endorsement of a proposed process for identifying and adopting heritage assets onto the List (see Section 5 Report Background).

3. Recommendations

3.0 It is recommended that Planning Policy Committee:

a) Agrees to adopt the Local Heritage List Criteria (Appendix A)
b) Endorses the assets previously identified by Northampton Borough Council and Daventry District Council as the foundation of the new WNC list
c) Agrees that delegated authority to add new heritage assets to the List be given to the Head of Planning Policy and Specialist Services in consultation with the Portfolio Holder for Planning, Built Environment and Rural Affairs

4. Reason for Recommendations

- The proposals will ensure a consistent and transparent approach to non-designated heritage assets across West Northamptonshire
- The proposals will provide the council with the tools to sustain and enhance the significance of heritage assets in accordance with NPPF paragraph 190
- The proposals accord with the Council's planning policies regarding the historic environment and non-designated heritage assets

5. Report Background

5.0 **Background to current position**

5.0.0 Non-designated heritage assets are locally identified 'buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets' (PPG).

5.0.1 Non-designated heritage assets are normally identified either through planning applications, conservation area appraisals, neighbourhood planning activity or as part of proactive local heritage list production.

5.0.2 Inclusion on a local heritage list based on sound evidence and criteria delivers a consistent and accountable way of recognising non-designated heritage assets to the benefit of good planning for the area and owners, developers and others. The process of preparing a local heritage list allows communities and neighbourhood plan-making bodies, in partnership with local planning authorities, to identify local heritage that merits recognition and protection under policy.

5.0.3   Significant work has already been undertaken by the former authorities to develop local heritage lists. Officers have assessed the existing work and concluded that having a single set of criteria and amalgamated list of hitherto identified assets should be prioritised.

5.0.4   This report therefore sets out the positions that have been inherited from each of the former councils in respect of criteria and processes, and the context and process for creating the new suggested criteria for the whole of west northamptonshire (attached at Appendix A), and proposals for a process to identify and assess assets going forward.

5.0.5   It should also be noted that, as part of the ongoing conservation area appraisal project in the former DDC area, the West Northamptonshire Council Planning Policy Committee has adopted local list assets onto the West Northamptonshire Local List.

5.1   **Criteria used by Former Councils**

5.1.0   All three former councils undertook work to recognise non-designated heritage assets, to different degrees, using varying methods. These are outlined below.

5.1.1   The former South Northamptonshire Council formulated and adopted a set of criteria, which were informed by current best practice, to identify non-designated heritage assets in a consistent manner, however there was no formal Local List created.

5.1.2   In the former Daventry District Council area, non-designated heritage assets were identified using a set of criteria created in line with current best practice and endorsed by Council.

5.1.3   The former Northampton Borough Council produced a Local Heritage List which focussed primarily on assets within the town centre during the 1990s. The criteria for this project are not available. New criteria were produced as part of a project which was agreed at committee in 2018, also created in line with current best practice.

5.1.4   **Proposed Criteria for West Northamptonshire**

        Historic England's *Local Heritage Listing: Historic Environment Advice Note 7 2021* states that "*the value of a local heritage list is reinforced when its preparation is informed by selection criteria, thereby encouraging a more consistent approach to the identification and management of local heritage assets across England, to the*

benefit of all" [1]. Having one clear agreed set of criteria, which is publicly accessible, supports not only the soundness of the list itself, but also the decisions made about assets on that list. The use of agreed criteria and a transparent process to assess assets would create consistency of process which has hitherto been lacking

5.1.5   Officers have assessed the existing criteria prepared by each council to ascertain whether there was any great difference in stringency or particularity to asset types which might necessitate having more than one set of criteria. This was particularly to see if there was a different approach in Northampton and the rural areas due to the potential difference of asset types in these areas. For example, a tendency towards vernacular architecture in the rural areas. This included evaluating the sets of criteria and assessing heritage assets from both the Northampton and Daventry lists against each set. It was found that there was not a prohibitive difference between the criteria, and it was agreed that drafting one set for the whole of West Northamptonshire was an appropriate course of action, and that in drafting the criteria, the treatment of urban and rural assets would be taken into account.

5.1.6   These draft criteria have been produced in accordance with Historic England best practice. As non-designated heritage asset types are varied, the criteria cover the following broad groups:

- Buildings
- Areas of Archaeological Interest, Sites and Monuments
- Parks, Gardens and Designed Landscapes
- Street Furniture and Public Monuments

Consultation with other heritage bodies, specifically County Archaeology and The Gardens Trust, has also been undertaken with comments being incorporated into the final draft criteria.

5.2   **Processes used by former Councils**

5.2.0   Currently, non-designated heritage assets can be identified through both proactive Council work, such as:

- through conservation area appraisals and neighbourhood planning activity;
- through specific local list production.

Also, potential non-designated heritage assets can be identified ad hoc through planning applications or through community activity.

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[1] Historic England, *Local Heritage Listing,* 2021, pg 11

5.2.1   The process undertaken in the former DDC area was to have assets adopted by Strategy Group (now using Planning Policy Committee) when identified through conservation area appraisals, which underwent public consultation. As there was otherwise no formal process for adding assets to the list which were identified through the planning system or neighbourhood planning activity this led to assets being left in a "limbo" where they had met the criteria but not been formally adopted by Council. This led to a disjointed approach to non-designated heritage assets and a lack of clarity in their status.

5.2.2   The main objective of the former South Northamptonshire criteria was to aid the identification of assets through planning applications and neighbourhood planning activity, however there is no formal list in this area and no formally agreed process.

5.2.3   An existing list for Northampton Town Centre was historically created by NBC, however this was a discrete process undertaken in the 1990s and no further assets were intended to be added at that time.

5.2.4   Subsequently, in recent years assets were identified by Northampton Borough Council through a resource intensive process which covered the entire borough area. This resulted in a great number of assets being identified. The objective of this project, prior to it being prevented by the COVID outbreak, was to have the non-designated heritage assets adopted by Cabinet, once the identification and consultation process had been completed. There was otherwise no formal process for adding assets to the list which were identified through the planning system or neighbourhood planning activity.

5.2.5   **Proposed Process for West Northamptonshire**

5.2.6   One of the objectives of producing and maintaining a Local Heritage List is that there is clear information presented for those with an interest in any asset which may have been identified as a non-designated heritage asset. An agreed process for adopting assets which have met the criteria threshold allows the Council and its customers to have confidence in information sharing and decision making.

5.2.7   It is proposed that any asset which is proven to meet the Council's threshold will be registered on the list by the Head of Planning Policy and Specialist Services in consultation with the Portfolio Holder for Planning, Built Environment and Rural Affairs. This will remove the potential for assets which have met the threshold to be kept in an uncertain status whilst awaiting consideration by Council, with the list instead being updated as and when needed.

5.2.8   For transparency, there will be a requirement for every newly identified asset to have an accompanying assessment form as evidence of it having met the threshold, which will be held and maintained by the Council.

5.2.9   An online copy of the list will be maintained by officers, so that the public have an up-to-date point of reference.

5.2.10 Heritage assets could come forward for nomination in the following ways:

- Conservation area appraisals
- Proactive local list expansion
- Neighbourhood planning activity
- Other community activity
- Planning applications

5.3.12 Nomination through conservation area appraisals and proactive local list expansion is within the control of the Council.

5.3.13 Community-led nomination can be managed by the Council through the sharing of the adopted criteria and support from officers. A clear and robust process would then give local groups confidence that assets which meet the criteria will be adopted onto the Local List.

5.3.14 The identification of non-designated heritage assets through planning applications is unlikely to produce many nominations. This can be managed through the internal sharing of the criteria and appropriate training of DM officers and other planning staff to ensure a consistent process.

5.3.15 All heritage assets which are proposed through these channels will be subject to public consultation, through Neighbourhood Planning or Conservation Area Appraisal consultations, or through the consultation period on planning applications. This will allow the public to continue to submit comments as they have done in the past.

5.3.16 Furthermore, there is an intention to produce an accompanying advice note to assist all stakeholders with the identification and nomination process. This will contain an introduction to NDHAs, information on the types of assets which have been adopted onto the list, and advice for those who engaging with NDHAs and the planning system.

5.3.17 Proposals to add assets that have already been assessed onto the West Northamptonshire List

5.3.18 As noted above, work has already been undertaken by the former Councils, and this council to identify properties for the Local List. It is suggested that these be added to the West Northamptonshire List, as follows:

- Properties that have been identified in Conservation Area appraisals produced by the former Daventry District Council.
- Properties that have been identified on the draft list produced by the former NBC.

5.3.19 In the report to cabinet in 2018, Northampton Borough Council agreed to undertake consultation on the draft list after the nomination process was completed. This was not undertaken, initially due to the COVID outbreak and subsequently delays caused by the unitary process. These assets all met the NBC criteria, and the

list was   agreed with the panel of experts (which included designers, conservation

officers,   architects and local history group representatives). The identification,

nomination,   assessment and selection of these assets has therefore already been through

a   robust process. Furthermore, a selection of those assets has also been

assessed   against the new draft criteria, and all met the threshold. As such, this

report is   seeking permission to endorse the assets identified in the NBC local

list project   without undertaking another public consultation.

5.3.20 Properties identified by local groups in the South Northamptonshire and Daventry areas in Neighbourhood Plans, where it is evident that the criteria have been used and any assets identified have met the threshold, are also recommended for endorsement.

5.3.21 In a number cases further work would be required to assess whether or not properties would qualify for adoption on the list namely:
- Properties identified by local groups in Neighbourhood Plans in the South Northamptonshire and Daventry areas where the criteria have not been used to identify assets, further work will be required to see if nominated assets can be added to the list.
- Properties in existing made Neighbourhood Plans from the Northampton area which have been identified as local heritage assets will need to be assessed against the new criteria.

6. Issues and Choices

6.0 Local Heritage Lists which are based on sound criteria play an important part in the open and transparent assessment of heritage assets, and the appropriate recognition of those assets which make an important contribution to local character.

6.1 Having agreed criteria in place, and a clear process for the identification and adoption of heritage assets onto the list will benefit all those who have an interest in the assets, including owners and members of the public.

6.3   The alternative options would be not to adopt the draft criteria and to keep the separate criteria and statuses as they currently exist.

6.4   Not adopting a single approach risks treating non-designated heritage assets across West Northamptonshire in an inconsistent manner, leading to less robust decision making. This may also lead to lack of clarity presented to the public.

6.5   Not having a consistent and efficient process to adopt assets which have been identified and met WNC criteria risks irregularity and possible contradiction in the processes undertaken by officers. This could in turn could lessen public confidence in the Council's decisions.

7.   Implications (including financial implications)

7.0   Resources and Financial

7.1.1   Adopting the criteria and agreeing the process for identification and adoption of NDHAs would have no material financial effects. Any minor costs could be covered by existing budgets.

7.1   Legal

There are no risks foreseen. Non-designated heritage assets are not statutorily designated, and their treatment is a consideration for policy rather than legislation.

7.2   Risk

7.3.1   There are no material risks foreseen in the adoption of the criteria or agreement of the identification and adoption process.

7.3.2   Not endorsing the criteria and agreeing the identification and adoption process would leave local heritage with lessened protection under policy and no clear understanding of its significance, thus increase the risk of its loss.

7.3   Consultation

7.4.1   The draft criteria have been produced in accordance with Historic England best practice (Local Heritage Listing: Historic Environment Advice Note 7, 2021) and the relevant consultees were asked for comments, these being County Archaeology and The Gardens Trust.

7.4.2   Once resolved, the Council's corporate communications team will publicise the updated list of heritage assets on the Council's website and social media channels.

7.5   Consideration by Overview and Scrutiny

Not applicable.

7.6.1 Climate Impact

7.6.2 The adoption of the criteria and identification of non-designated heritage assets will assist in the sustainable retention and reuse of heritage assets, and secure the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring.

7.6.3 Community Impact

7.7.1 It is unlikely that the adoption of the criteria and process would have any material effect on crime or disorder.

7.7.2 The proposed course of action should not have any perceptible differential impact on people with protected characteristics.

7.7.3 Adopting the criteria and process would contribute to preserving the character of places which make up West Northamptonshire. As such, it would support the well-being of residents and those who work in or visit West Northamptonshire.

8 Background Papers

Department for Levelling Up Housing and Communities (2023) National Planning Policy Framework

Daventry District Council Harlestone Conservation Area Appraisal Report to Strategy Group 6th July 2017

Northampton Borough Council, Preparation of a Local Heritage List for Northampton, Report to Cabinet, 9th May 2018

South Northamptonshire Council Non-designated Heritage Asset Criteria report to Cabinet (18th March 2020)

Appendix A- DRAFT WNC LOCAL HERITAGE LIST CRITERIA

Buildings

A- Age and Survival

A1- If the building predates 1700, does it retain any legible features of original construction?

A2- If built between 1700-1840 does the building retain any legible features of original construction?

A3- If built between 1840-1919 does the building retain some legible features of original construction?

A4- If the building dates from 1919 onwards, is it a relatively unaltered example of a particular style or period?

B- Historic Interest/ Association

B1- Does the building illustrate an important part of West Northamptonshire's social, economic, cultural or religious history?

B2- Is the building associated with an important local or national person or event?

B3- Is it an unusual; a notable example; representative of; or a rare survivor of building type in West Northamptonshire?

C- Architectural Interest

C1- Was the building designed by a national or locally important architect or builder?

C2- Is the building a good example of its type or distinctive to an area in West Northamptonshire?

C3- Is the building constructed using unusual or distinctive materials or designs, innovative techniques or local craftsmanship?

D- Landmark or Group Interest

D1- Is the building a local landmark or have visual or aesthetic importance in a street scene?

D2- Is the building an important part of a wider grouping of heritage assets?

E- Community Value

E1- Does the building have an historic connection to a particular local group in the community, or has it come to represent or be used by an identifiable current group? N.B for this criterion to be relevant, one criterion from parts A and B must also apply

Areas of archaeological interest, sites and monuments

A- Age and survival

A1- If the site pre-dates 1066 (prehistoric or early medieval), is there clear and legible evidence of surviving archaeological structures or features?

A2- If the site dates to the period 1066-1539 (later medieval), does it survive in legible form without significant deterioration or loss of archaeological features?

A3- If the site dates to the period 1540-1840 (post medieval), does it survive in legible form without significant deterioration or loss of archaeological features?

A4- If the site dates to the period 1840-1914 (Victorian/Edwardian), does it survive with minimal deterioration or loss?

A5- If the site dates to the period 1914 onward, does it survive in very good condition with highly legible archaeological structures or features?

N.B. Legible evidence can include earthworks or other archaeological structures, crop marks or surface finds which indicate below ground features.

B- Archaeological merit

B1- Is the site a locally distinct example of a well-preserved site?

B2- Is the site part of a clearly identifiable wider historic site or landscape?

B3- Is the site a pivotal, key or landmark site/monument within its surroundings or landscape?

B4- Does the site have a strong association with an important element of social history or historic events? Can it be identified with locally or nationally famous individuals?

C- Documentation/finds evidence

C1- If the site shows signs of deterioration or loss, is there documentation, or evidence such as artefacts or ecofacts which enhance our understanding?

N.B. Sites which have previously been excavated may still retain archaeological interest and the capacity to enhance our understanding of a site or its setting.

Parks, Gardens and Designed Landscapes

A- Age and Survival

A1- If the site pre-dates 1540, can any surviving designed garden or landscape features be identified in anything like their original form? Is there any documentary evidence which helps our understanding

A2- If the site dates to Tudor and Stuart period, approx. 1530 to 1740, does the site survive in anything like its original form?

A3- If the site is dated 1740-1840, does it survive in fair condition, including evidence of structures, features or landscaping?

A4- If the site dates to the period 1840-1914, does it survive without much deterioration or loss of historic features? Is it a good example of Victorian or Edwardian style?

A5- If the site dates to the period 1914 onwards, is it a relatively unaltered example of a park, garden or designed landscape?

B- Aesthetic Interest

B1- Is the site a locally distinct example of a particular period of design?

B2- Is the site part of an identifiable wider historic site or landscape?

B3- Is the site a pivotal, key or landmark site within its surroundings or landscape?

B4- Does the site have a high community value, for example as a commemorative site?

B5- Does the site have a strong association with an important landscape designer or architect on either a local, regional or national level?

B6- Does the site display the use of innovative or unusual design or technology?

B7- Does the site hold horticultural, arboricultural or silvicultural qualities or potential which enhance its significance?

Street Furniture & Public Monuments

A- Age and condition

A1- Is there clear evidence that the structure pre-dates 1700?

A2- If the structure dates to the period 1700-1840, does it survive in anything like its original condition and in its original location (or is there clear evidence for a relocation)?

A3- If the structure dates to the period 1840-1914, is it in good condition and sited in its original location (or is there clear evidence for a relocation)?

A4- If the structure dates to the period 1914 onwards is it a good example with minimal deterioration or alteration?

B- Historic interest/ association

B1- Is the structure illustrative of an important aspect of West Northamptonshire's social, economic, cultural or religious history?

B2- Is the structure associated with a national or locally important architect or designer?

B3- Does the structure represent a particular important event or events from history?

B4- Is the structure an unusual or rare survivor of its type?

C- Aesthetic/ Design character

C1- Is the structure of notable design in West Northamptonshire?

C2- Is the structure a good example of a thematic type of asset (e.g telephone boxes)?

C3- Were any unusual or innovative techniques used in its construction, or is it an example of local craftsmanship?

D- Landmark/ Group value

D1- Is the structure a prominent or dominant asset within the streetscene or landscape?

D2- Is the structure an important part of a wider grouping of heritage assets or a landscape?