

Non-Designated Heritage Assets

Introduction

Planning policy for the historic environment, as set out in the National Planning Policy Framework (NPPF)

https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf, relates primarily to 'heritage assets'. These are defined as follows within the NPPF glossary:

Heritage asset: 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 latter part of this definition is not entirely clear, and it is worth turning to the Planning Practice Guidance (PPG) for clarification: <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>. This note pulls out some of the key facts, with particular reference to non-designated heritage assets (NDHAs).

Clarification

Definitions

As outlined in the PPG, 'heritage assets are either designated heritage assets or non-designated heritage assets'.

Some NPPF policy applies to all heritage assets, some just to designated heritage assets, and some just to non-designated heritage assets. If some part of the historic environment is not defined as a heritage asset, it is not protected by NPPF heritage policy.

Designated heritage assets are clearly defined in the NPPF:

- World Heritage Sites (designated by UNESCO)
- Scheduled Monuments (designated by the DCMS Secretary of State)
- Listed Buildings (designated by the DCMS Secretary of State, at Grade I, II*, or II)
- Protected Wreck Sites (designated by the DCMS Secretary of State)
- Registered Park and Gardens (designated by Historic England, at Grade I, II*, or II)
- Registered Battlefields (designated by Historic England)
- Conservation Areas (designated primarily by local planning authorities).

The PPG defines *non-designated heritage assets* as follows:

Non-designated heritage assets are 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.

There are a few key points to note here:

- NDHAs may only be identified by 'plan-making bodies', i.e., those producing components of the development plan, such as local plans and neighbourhood plans: in practice this means local planning authorities and town/parish councils or neighbourhood forums. NDHAs cannot be identified by others, including County Gardens Trusts and Historic Environment Records.
- It is however possible for County Gardens Trusts to present their park and garden research to plan-making bodies and encourage them to identify these parks and gardens as NDHAs.
- 'NDHA' has a clearly defined and very specific meaning, and is not just something historic that is not a designated heritage asset.
- Despite the negative framing of the PPG definition of NDHAs as sites 'which do not meet the criteria for designated heritage assets', there is in fact a high bar for identifying NDHAs. As the PPG advises, 'a substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage significance to merit identification as non-designated heritage assets'.
- Despite this reference to 'buildings', NDHAs are not just limited to buildings, but can include parks and gardens, monuments, and more, as above.

Identification

There are a number of ways in which plan-making bodies can identify NDHAs:

- Local (heritage) lists
- Local plans
- Neighbourhood plans
- Conservation area appraisals and reviews
- Decision-making on planning applications.

It is important to emphasise that not all NDHAs are on 'local lists', therefore.

Whilst all NDHAs should still be clearly identified as NDHAs by the local planning authority, however they were designated, this is not always the case.

Information

Further information about heritage assets or elements of the historic environment which are not designated may be found in:

- LPA websites
- The local Historic Environment Record: <https://historicengland.org.uk/advice/technical-advice/information-management/hers/> (NB not everything on an HER is an NDHA; where NDHAs are included within the HER, they should be clearly identified as such)
- For all designated heritage assets apart from conservation areas, Historic England's National Heritage List for England (NHLE): <https://historicengland.org.uk/listing/the-list/>.

In turn, information on designated heritage assets such as registered parks and gardens can be added to the NHLE under the 'Missing Pieces' initiative (formerly 'Enriching the List') <https://historicengland.org.uk/listing/missing-pieces/>; information on any historic parks and gardens may be added to HERs.

Further information on NDHAs and local listing may be found in Historic England's published advice: HEAN 7, <https://historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/heag301-local-heritage-listing/>.

July 2024