

Royal Borough of Greenwich Local Heritage Listing

Procedure Note and Selection Criteria

March 2021

First published 2015
Revised 2021

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I. Local Heritage Listing Guidance

What is Local Heritage Listing?

- I.1 A local heritage list is a way of celebrating heritage which is valued by the local community and which enriches and enlivens the locality. Local Heritage Listing is a means for the community and the local planning authority to identify heritage assets which create local distinctiveness and a sense of place.
- I.2 Buildings and structures on the Royal Greenwich Local Heritage List ('the List') are considered important in their local context due to their architectural, historical, archaeological or artistic significance, as defined in the National Planning Policy Framework, as well as their townscape, landscape, communal or cultural value.
- I.3 Entries on the List have the status of 'non-designated heritage assets' or 'local heritage assets'. The Government defines non-designated heritage assets as

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 assets¹

Please note where 'buildings' are mentioned in this text, they also include monuments, sites, places, areas or landscapes.

- I.4 Lists provide clarity on the location and significance of local heritage assets and can also play a key role in promoting the cultural identity of a place.

What planning guidance is there on local heritage listing?

- I.5 The Government's [Planning Practice Guidance](#) (paragraph 40) advises that plan-making bodies such as local planning authorities should make up to date information on non-designated heritage assets accessible to the public. Local planning authorities are recommended to keep a local list of non-designated heritage assets to provide greater clarity and certainty for owners, developers and decision-makers.
- I.6 The Royal Borough has held a local heritage list since 1977. This is regularly updated and is publicly available on the Council's website. It currently comprises approximately 700 entries.
- I.7 Historic England's best practice guidance on [Local Heritage Listing](#) (January 2021) recommends the use of location-specific selection criteria to define the scope of a local heritage list and to ensure an objective and consistent approach to the identification of local heritage assets. Improved local selection criteria, which have

¹ Planning Practice Guidance (PPG): Historic Environment, Ministry of Housing, Communities and Local Government, paragraph 039, 23 July 2019

been tested through public consultation, ensure decisions identifying local heritage assets are based on sound evidence.

- I.8 The Royal Borough's original selection criteria for adding assets to the List were published alongside the List in 1977. The criteria have now been comprehensively revised and expanded to include additional heritage asset categories, in line with Historic England's best practice guidance 2016 and the Government's definition of non-designated heritage assets. In addition to buildings, monuments, sites, places, areas and landscapes are eligible for inclusion. The revised selection criteria are provided in section 3.
- I.9 Community engagement is an overarching aim of national planning policy and is important to the Royal Borough. Public nomination and consultation therefore forms an integral part of our local listing procedure, which enables communities and other stakeholders to have a say. Consultation can help to identify errors or inaccuracies and provides an opportunity to test public support, which is important if policies directed towards protection are to succeed.

What are the implications of local heritage listing?

- I.10 Unlike listing at national level, local listing does not provide further legislative controls and does not change the requirements for planning permission or a householder's permitted development rights. Unlike national listing, which provides control over changes to a building's interior and exterior, local listing protects the exterior of a building or group of buildings only.
- I.11 A locally listed building is defined as a heritage asset in planning legislation. The National Planning Policy Framework (NPPF) states heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance.
- I.12 The fact that a building features on a local heritage list means that its conservation as a heritage asset is an objective of the NPPF and, therefore, a material consideration when determining a planning application. Being identified on a List also demonstrates that a building or site makes a positive contribution to the character or appearance of a place.
- I.13 The NPPF directs local planning authorities to assess the significance of any heritage asset affected by a development proposal. Local authorities are also directed to consider the effect on the significance of non-designated heritage assets in determining applications. Historic England advise that NPPF policies apply to all heritage assets regardless of whether they are locally listed.² Consequently, the NPPF policies above not only apply to buildings already on the List but also to any buildings identified as heritage assets during the planning process and which meet the selection criteria for local heritage listing.

² Historic England online guidance: <https://historicengland.org.uk/advice/hpg/has/locallylistedhas/>

- I.14 This procedure note, therefore, includes provision for local listing of a building identified as a heritage asset during the planning process. This is when appraisal of a building or site and its significance occurs and so candidates for local heritage listing may only come to light at this stage. This provision will ensure the building's significance and any effect on its significance can be understood and considered during the decision-making process, as directed by national planning policy. The Government's definition of heritage assets includes those identified by the Local Planning Authority.
- I.15 The Royal Greenwich Local Plan recognises that local heritage assets are an important part of Royal Greenwich's built heritage. Policy DH(j) states that substantial weight will be given to protecting and conserving the characteristics of locally listed buildings and proposals for their demolition or unsympathetic alteration will be strongly discouraged. Consequently, every effort will be made to ensure their long-term retention, maintenance and use. Where these buildings are located within a conservation area, policy DH(h) will also apply which requires special attention to preserving or enhancing the character or appearance of the conservation area.
- I.16 When developing schemes for alterations and extensions, applicants should ensure that they respect the particular character and significance of the building and that proposals show a good understanding of what gives the building its special interest. Planning permission will normally only be granted for alterations and extensions that preserve the character and appearance of a local heritage asset. If expedient, enforcement action may be taken against breaches of planning control that involve harm to a local heritage asset.

How are assets added to the List?

- I.17 The List is intended to be fluid and will continue to be updated on a regular basis using the following methods:
- Annual/biennial update through public nomination
 - Identification through the planning process
 - Identification through conservation area appraisal or designation process

Annual/biennial update via public nomination

- I.18 Every 1-2 years the Royal Borough will invite nominations for additions to the List from local community groups, amenity societies and members of the public. This will be advertised on the Royal Borough's consultation portal and its social media channels. Similarly, nominations for removals from the List will be considered (see paragraph 2.8). Updates or corrections to existing entries will also be invited. This will provide residents with the opportunity to be involved at an early stage and to be fully engaged with the process of local heritage listing.
- I.19 Valid nominations which fulfil the selection criteria or no longer meet the criteria will be recommended to the Cabinet Member for Regeneration and Growth for inclusion or removal from the List.

Identification through the planning process

- I.20 Buildings identified as non-designated heritage assets through the planning process and which fulfil the selection criteria will be recommended to the Cabinet Member for Regeneration and Growth for inclusion on the List.
- I.21 Identification of local heritage assets during the planning process will fulfil the Royal Borough's duty to ensure the building's significance is fully taken into account during the decision-making process.

Identification through conservation area designation or appraisal

- I.22 Proposed conservation area designations and appraisals will usually include recommendations for local heritage listing. Such buildings will become local heritage assets when Cabinet approves the appraisal or designation.
- I.23 The List will also be updated when any errors or inaccuracies are identified.

How do I nominate a building, monument, site, place, area or landscape?

- I.24 Nominations will be invited from community groups, amenity societies and schools as well as members of the public during the annual/biennial updates, but are welcome at any time, especially if a candidate asset is at risk from redevelopment.
- I.25 Nominations should be supported by information of sufficient detail and accuracy to meet the requirements set by the selection criteria. Please include the following information:
 - a. Property address and/or location map
 - b. Photographs of the main elevations
 - c. Name and contact details of the owner (if possible)
 - d. Statement explaining how the nomination meets the **Selection Criteria** (see Section 3 below)
- I.26 Nominations should be sent by email to planning.policy@royalgreenwich.gov.uk or by post to: Planning Policy Team, Royal Borough of Greenwich, 5th Floor, The Woolwich Centre, 35 Wellington St, London SE18 6HQ.
- I.27 Guidance for communities on local heritage listing is available from 'Civic Voice' [here](#).

2. Local Heritage Listing Procedure

Preliminary assessment

- 2.1 Publicly nominated buildings and buildings identified through the plan-making or decision-making process are assessed and will be taken forward if they fulfil the selection criteria. Public nominations will be automatically rejected if they do not contain the information set out in paragraph I.24 above or fall outside the jurisdiction of the planning system.

- 2.2 If a valid planning consent for the demolition or significant alteration of the building proposed for inclusion exists, the nomination will not be progressed.
- 2.3 Valid public nominations will be added to a waiting list for future assessment, which will take place every 1-2 years, when nominations will be invited from local community groups, amenity societies and individuals.

Consultation process

Annual/biennial update via public nomination

- 2.4 Proposed additions to/removals from the List will be subject to a public consultation period of 28 days in which the views of the owner/occupier will also be sought. The consultation will be advertised on the Royal Borough's consultation portal and its social media channels. Comments will be invited on the merits of the buildings proposed for local heritage listing in respect of the six selection criteria.

Identification through the planning process

- 2.5 Identification can be made during the planning application or pre-application process, normally using the Royal Borough's in-house heritage expertise, but can be prompted by public nomination. Owner/occupiers will be notified and will have 14 days in which to respond. This will avoid unnecessary delays to the planning process and provide certainty to stakeholders in a timely manner.

Identification through conservation area designation or appraisal

- 2.6 Proposed conservation area designations and appraisals will usually include recommendations for local heritage listing. They are subject to a 28-day public consultation period and require the final approval of Cabinet. Notification in respect of proposed local listing will be sent to the owner/occupier during the consultation.

Challenges & appeals

- 2.7 Those wishing to challenge the proposed inclusion of a building on the List should note that grounds for objection are restricted to heritage significance with respect to the selection criteria, for which relevant evidence should be provided. Personal circumstances or other factors will not normally be taken into account.
- 2.8 There is no right of appeal against a building's inclusion once it is placed on the List. The Royal Borough will not consider removing a building from the List unless the asset has been added to the National Heritage List for England (NHLE) or no longer meets the selection criteria due to demolition or significant alteration. Neglect or minor changes such as windows/doors will not be grounds for removal from the list.

Final assessment and decision

- 2.9 Buildings proposed for inclusion are assessed in the light of any responses arising from consultation and their significance is judged against the selection criteria.
- 2.10 Officers will recommend to the Cabinet Member for his or her approval any buildings or structures that have been identified and fulfil the selection criteria for

inclusion on the Local Heritage List. Consultation responses will be reported back to the Cabinet Member, including where the proposed listing is challenged, with a recommendation as to whether the building should be included on the List.

- 2.1.1 Nominating bodies or individuals and owner/occupiers will be notified in writing of the decision and the updated List will be made available on the Royal Borough's website. Entry on the List will be a Local Land Charge.

3. Selection Criteria for Local Heritage Listing

- 3.1 Six selection criteria for local heritage listing are set out below. The likelihood of buildings, monuments, sites, places, areas or landscapes being selected will be increased if they can be demonstrated to meet more than one of the criteria.
- 3.2 These criteria are based on the guidance produced by Historic England on *Local Heritage Listing* and on the statutory criteria for national listing.
- 3.2 It should be noted that only nominations identified 'as having a degree of significance meriting consideration in planning decisions' will qualify for local heritage listing, as per national planning guidance (PPG, 2019). Items which fall outside the jurisdiction of the planning system will therefore be excluded from consideration. The guidance also advises that only a minority of candidates will have sufficient heritage significance to merit identification as non-designated heritage assets.

Criterion 1: Architectural Significance

Assets that:

- Were built before 1850; and/or
- Exemplify an unusual or rare building type or function; or employ an unusual architectural style or materials; and/or
- Are representative of a particular architectural period, architect, movement, industry, or company etc. and retain original fabric and features which signify the building's original function; and/or
- Demonstrate distinctive or exceptional architectural quality, design or technology or any other distinctive local characteristics (such as plan form, layout, landscaping, proportions, materials, decoration, craftsmanship, technological innovation); and/or
- Are attributed to an architect, designer, gardener or craftsperson of local or national significance and demonstrate qualities of design, execution or innovation

Criterion 2: Historical Significance

Assets that:

- Demonstrate rare evidence of a particular phase or period of the area's history; and/or
- Have a historical association with a locally or nationally important individual, family or group; and/or
- Have a historical association with a particular industry, event or movement of local or national note; and/or

- Illustrate particular aspects of the area's social, religious, political, cultural, economic, military, industrial, scientific or technological history

Nominations under this criterion will need to retain physical attributes which are important to their historical significance

Criterion 3: Archaeological Significance

Assets:

- Which provide evidence about past human activity in the locality, in the form of buried remains, or within the structure of buildings or a manmade landscape.

Criterion 4: Artistic Significance

Assets:

- Attributed to an artist, designer or craftsperson of local or national significance and demonstrate qualities of design, execution or innovation. This could include sculpture, painting, decoration, advertisements, memorials, gates, railings, door surrounds, finials and signage

Criterion 5: Townscape or Landscape Significance

Assets that:

- Form a group with a clear visual design or historic relationship (group value); and/or
- Contribute to the locally distinctive character of an area, positively contribute to the street scene, landscape or locality by providing local distinctiveness and interest; and/or
- Contribute positively to the setting or group value of nationally Listed Buildings; and/or
- Key buildings or landmarks which possess strong communal or historical associations or striking aesthetic value, that strongly contribute to a view or vista; and/or
- Historic landscapes, parks and gardens of local importance (providing they have no existing designation). This may relate to design or social or military history

Criterion 6: Communal or Cultural Significance

Assets:

- Associated with distinctive communal, commemorative, symbolic or spiritual significance; and/or
- Relating to places perceived as a source of local identity, social interaction and coherence, valued by the wider community; could be intangible heritage contributing to the 'collective memory' of a place; and/or
- Associated with locally distinctive cultural heritage including art, literature, music or film