

# THE CITY OF DURHAM TRUST

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23 December 2024

## Strategy and Delivery (planning)

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### Non-Designated Heritage Asset Supplementary Planning Document consultation (phase 2)

Thank you very much indeed for the opportunity to comment on the above 2nd draft document. The City of Durham Trust strongly supports the County Council's initiative in producing a range of SPDs to assist with interpretation and application of particular County Durham Plan policies.

We are pleased that the County Council has taken on board a number of the points we made in our response to the first draft of this SPD. We particularly welcome the more detailed explanation of what non-designated heritage assets (NDHAs) can include [para 1.2]. However, there are still a few aspects of the 2nd draft of the SPD that would benefit from clarification.

#### Criteria

In para 3.5 the SPD notes that "The word "asset" is used as a collective term to cover any potential NDHA". In point 3 it should be made clear that artistic interest is wider than just an architectural context. For example, use of the wording "To be of artistic interest the asset should be the subject of works of art by known artists, and/or be of local or national acclaim."

However, in 'Appendix 1 - Criteria' the terminology used is dominated by references to 'buildings'. There needs to be clarification that if the asset being assessed for NDHA status is not a building then the criteria should still be used but interpreted appropriately to the nature of the asset. This could be a statement at the beginning of the Appendix. Additionally, improved wording of the criteria could aid this clarification, for example:

Table 1: Age and Rarity.

AR2 to AR6. Clarify that the age ranges given for buildings could be appropriate to examples of artworks, or green assets such as gardens, or etc. etc.

Amend AR 7. Is it a locally important landmark building, folly, curiosity, or landscape asset?

Table 3: Architectural or Artistic Interest

Amend AA1. Are locally valued for their architectural or artistic interest

Table 4: Historic Interest

Amend H2. Activity or site / landscape crucial to the development of a place.

Amend H6: Locally famous or notable people, events, sites or landscapes.

#### Process

Para 4.1 Nominations and Deletions.

This should include information for how a group / individual can obtain the NDHA nomination form (either electronically or in paper form) to be used to make nominations / deletions [para.

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4.3] or when responding to a planning application where the respondent wishes to highlight the presence of a previously unidentified NDHA [para, 3.1].

## Para. 4.4 Limitations

This paragraph is still a bit unclear. We suggest the following wording:

Please note that heritage assets that are subject to current planning applications or appeals cannot be considered for inclusion on any future local list at that time, although their heritage significance will be considered in making the planning decision. Similarly, where permission has been granted for demolition, heritage assets will no longer be eligible for NDHA status or inclusion within a future local list.

## Access to information

Para. 4.2 states that "All NDHAs will be entered on the Historic Environment Record which through the normal search process will inform research and supporting documentation to planning applications." However, will owners be proactively informed that they own an NDHA? Will all 'plans' that affect an NDHA require making a planning application? NDHAs can comprise many types of assets, not just buildings, and these may not currently fall under the requirement for obtaining planning permission. This issue should be clarified in the SPD.

We hope that the above comments are helpful in achieving the welcome purpose of this Supplementary Planning Document.

Yours sincerely

**John Lowe**

Chair, City of Durham Trust