

Cabinet

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Local Heritage Asset List for Medway – Request for Adoption of Selection Criteria and Online Publication

Portfolio Holder: Councillor Simon Curry, Portfolio Holder for Climate Change and Strategic Regeneration

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Summary

Local authorities are encouraged by Government and Historic England to produce lists of locally important heritage assets which do not meet the strict criteria for inclusion on a national list or register. Such lists can include a broad range of heritage asset types, including those which may represent intangible heritage as an important part of Medway's cultural heritage. The Submission Local Plan includes a commitment to the production of a local heritage asset list as part of the Council's required positive strategy for heritage in the Plan. This report seeks to summarise the project being undertaken by the Planning Service to create a list, to request approval for adoption of the draft selection criteria unique to Medway's heritage, and the publication of a first draft of the list along with the selection criteria on the Council's website.

1. Recommendations

- 1.1. The Cabinet is requested to adopt the 'Medway Local Heritage Asset List criteria for selection' attached as Appendix A to the report, for publication on the Council's website. Along with an initial list which will include all historic parks and gardens surveyed by the Kent Gardens Trust in partnership with the Council and Kent County Council (KCC) as Appendix B to the report, and all historic farmsteads still in existence that were surveyed by Historic England and KCC in 2012 and which are included on the Kent Historic Environment Record attached as Appendix C to the report.
- 1.2. The Cabinet is also requested to agree to the ongoing process of publication of further assets on the list, subject to selection by the Council's Conservation Officers using the approved selection criteria.

2. Suggested reasons for decisions

- 2.1. Adoption of selection criteria, and an initial list of heritage assets with plans for further inclusion, will enable the Council to fulfil its commitment to a positive strategy for the historic environment within the Submission Local Plan, eventually opening up a system for nominations to the public. It will form part of the cross-departmental Heritage Strategy, the consultant brief for which is currently being drafted as part of the Medway Heritage Place programme with the aim of raising the profile of local heritage and engaging with communities. Assets will be added to the GIS mapping system so that they can be a material consideration when determining planning applications.

3. Budget and policy framework

- 3.1. The decision of Cabinet sits within the Development Plan as part of the budget and policy framework. It forms part of the positive strategy for the historic environment that is set out in the National Planning Policy Framework (NPPF), which is the overarching national policy framework under which local planning authority Development Plans sit.
- 3.2. Locally listed heritage assets can also be known as non-designated heritage assets, which are a material consideration within the NPPF. The Medway draft Local Plan has just been submitted to the Planning Inspectorate for examination this year. Draft Policy DM9: Heritage Assets, includes within its supporting text reference to Medway's non-designated heritage assets such as historic parks and gardens, and the ambition of the Council to establish a Local Heritage Asset List.
- 3.3. The evidence base for the Submission Local Plan includes the Medway Local Plan Heritage Asset Review. This sets out the themes of Medway's heritage and includes a section on non-designated heritage asset, with resources listed as references when the list is compiled, and a draft list of nearly 500 assets which was not taken forward into a local listing project due to resources.

4. Background

- 4.1. The Government's Planning Practice Guidance (PPG) is supporting guidance to the policies within the National Planning Policy Framework (NPPF). These are the national planning policies that local planning authorities must refer to when making decisions on planning applications. The PPG includes a section on what are called 'non-designated heritage assets' (NDHAs), which includes advice on how local authorities should identify them and take them into account when making decisions. These are heritage assets that have been identified as having local heritage importance but are not included on any national lists or registers, such as listed buildings.
- 4.2. In practice, NDHAs are also known as locally listed heritage assets if they are included on a list compiled by a local planning authority. Assets do not need to be on a local list to be considered NDHAs by the planning authority, but it is recommended in the Planning Practice Guidance that lists are compiled. This

gives greater transparency to decisions by a local planning authority to consider a building or structure an NDHA, when making a decision on a planning application.

- 4.3. A local list project is not a statutory procedure and there is no set methodology for producing and publishing a local list. Historic England has produced an advice note, '*HEAN7: Local Heritage Asset Lists*' which makes some suggestions for best practice. It is important to note that inclusion on a list does not involve any restrictions on the building or structure. It is a material consideration for planning officers, and there is a policy within the Historic Environment section of the National Planning Policy Framework which directs planning authorities on how to assess the effect of a planning proposal on the heritage significance of an NDHA. This is paragraph 216 of the NPPF:

'216. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.'

- 4.4. Support has been received from Historic England to expand the definition of heritage assets to highlight the importance of intangible as well as tangible heritage assets. Unesco defines and safeguards intangible heritage, under the themes of traditional, inclusive, representative and community-based. This approach is acknowledged to be unique in England, which would mean that Medway Council could lead the way nationally by exploring this approach. Intangible heritage includes those parts of our cultural heritage which may not be obvious as objects but can be connected to a specific place through past events, memories, or traditions. There is clear community and sector support from this as evidenced by the 2025 Medway Heritage Audit carried out as part of the National Lottery Heritage Funded Heritage Place programme.
- 4.5. Medway Council hosted a 'Historic Places Panel' visit in September 2025, which is an independent panel of heritage and built environment professionals, facilitated by Historic England. The Council's proposed approach to broadening the definition of heritage, in accordance with Unesco definitions, across its departments and recognising intangible heritage more widely was enthusiastically supported by the Panel, through feedback during the event and in the subsequent report. The Panel's report was received on 10 February 2026 with specific support for involving the community in the conservation and enjoyment of the historic environment, and the social, economic, cultural and environmental benefits that this brings.
- 4.6. The Heritage Lottery-funded Heritage Place Team has created an interactive map called the 'Medway Heritage Map' as part of the Heritage Place project, available on the Council's website at https://www.medway.gov.uk/info/200182/arts_and_heritage/1884/medway_heritage_place_project/2. This project encourages members of the public to identify and share heritage which can be anything that is valued from the past. Examples given are:

- Buildings;
- Boats;
- Historic landscapes;
- Cultural traditions;
- Recipes;
- Personal collections.

4.7. The published Local Heritage Asset list webpage will include a link to the Medway Heritage map. The map is one method for residents and communities to propose local heritage of importance, which could then be considered for local listing as well as being included on the map. Entries on the list will need to have a physical presence for mapping identification purposes as a planning constraint.

4.8. Medway Council officers from the Heritage Place Team and Conservation Officers in the Planning Service have been working closely together, with mentorship from Historic England, to ensure that the Medway Heritage Strategy currently in development provides a robust framework for managed conservation and the celebration of Medway's heritage, encompassing both the corporate responsibilities and planning functions of the Council as well as supporting communities to have a strong voice in decision making around heritage conservation.

4.9. After discussion with Historic England and research into best practice, as well as experience, a staged process for local listing has been drafted so that the project can have an online presence at an early stage. This is broadly as follows:

- Create and consult internally on Medway local list selection criteria.
- Publish these criteria along with a first tranche of local listing with two asset types, Kent Compendium Historic Parks and Gardens and historic farmsteads on the Kent Historic Environment Record, which are vulnerable to development and/or may be under-appreciated as assets, and for which we already have data from other sources. Filter out those on the record that are no longer in existence before publication.
- Begin to compile a list of any suggestions made by colleagues through the planning process, the entries on the Medway Heritage Map, or in any community engagement events, to be assessed against the criteria periodically and added to the list.
- Liaise with Neighbourhood Development Plan groups who have identified, as per Government guidance, local heritage assets in their plans, or assist emerging plans with identifying these, and assess these against the published criteria.
- Research potential standing military history assets that are not statutorily protected, using Historic England's research on the Hoo

Peninsula as well as other sources set out in the 2017 Medway Local Plan Heritage Asset Review, and apply the selection criteria for inclusion.

- Review the approximately 500 properties surveyed previously and apply the selection criteria for inclusion.
- Finally, adapt the Medway Heritage Map site to continue to welcome all additions, but explain that some may be included on a separate Local Heritage Asset List as well, if meeting the specific criteria. We will work with colleagues to advertise widely and seek assistance from any heritage groups within Medway that would like to be involved in the process.

4.10. The first two bullet points comprise the first stage of the process, which is the subject of this report. The Kent Compendium of Historic Parks and Gardens was compiled by the Kent Gardens Trust, sponsored by KCC and other authorities in Kent. Medway commissioned the Gardens Trust to carry out a review of the existing compendium in 2013-2014, using English Heritage's criteria for identifying the significance of local heritage assets. The 26 parks and gardens identified in Medway each have a dedicated report which sets out its heritage significance, accessible on the Gardens Trust website as well as through the KCC Historic Environment Record.

4.11. In 2012, Historic England and KCC undertook a comprehensive survey of farmsteads in the county, identifying typologies prevalent in the different parts of Kent. A report was produced and all farmsteads visible on the 2nd edition OS map of the late 19th century were mapped and included on the Kent Historic Environment Record. The record for each farmstead includes information on what is still in existence, what the farmstead typology is (such as dispersed plan, or courtyard plan) and whether it is in a rural, suburban or urban location. The motivation for this work included the impact of a court decision which became important caselaw in planning, for determining whether a farm building could be considered 'curtilage listed' to a listed farmhouse.

4.12. Curtilage listed buildings are legally those that formed part of the land of the listed building since before 1 July 1948 and are ancillary to the use of the main listed building. The court decision concluded that many agricultural buildings could no longer be considered curtilage listed as they were previously, as agricultural uses were not ancillary to the residential use of a farmhouse. This has left many historic farm buildings vulnerable, as it was rare in the past for them to be separately listed, even if they were contemporary to the farmhouse.

4.13. Farmstead typologies are also an important locally distinctive feature and therefore can be used as a basis for locally distinctive new developments, including reuse of any existing historic farm buildings. The Historic England and KCC project resulted in Kent-wide guidance for historic farmsteads produced by KCC. The National Landscape units have tailored these to their areas. In Medway, the Kent Downs National Landscape planning guidance

includes a 'Kent Downs National Landscape Farmsteads Guidance' document for planning reference.

- 4.14. Local listing is not linked to the provisions within the Localism Act (2011) for designating buildings or land as Assets of Community Value (ACV). This is a statutory process, unlike local listing, and its purpose is to safeguard community facilities rather than assets of cultural heritage value. However, there may be some cases where an ACV coincidentally is considered by a local planning authority to meet the criteria for local heritage asset listing. Neither would affect the process of the other.

5. Options

- 5.1. The options available are:

- A. Approve the request to adopt the Medway Local Heritage Asset List selection criteria for publication on the Council's website, along with the first tranche of listings, historic parks and gardens and historic farmsteads.
- B. Approve the request to adopt the Medway Local Heritage Asset List selection criteria for publication on the Council's website, but not the suggested first tranche of listings.
- C. Suggest revisions to the Medway Local Heritage Asset List selection criteria for amendment and re-consideration at a later date by Cabinet.
- D. Reject the requests for adoption of the criteria and publication of a first tranche of local heritage assets.

6. Advice and analysis

- 6.1. Adoption of the selection criteria for publication online, announcing the Local Heritage Asset listing process, will raise the profile of locally important heritage assets which can eventually incorporate a wide range of cultural heritage themes that resonate with Medway's communities. The mapping of the heritage assets as planning constraints will ensure that their conservation, where appropriate, is taken into consideration in plan making and decision-making processes. For buildings, reuse of historic buildings is very sustainable in terms of embodied carbon retention and is supported by Government and Historic England advice and guidance.
- 6.2. Adoption of the first tranche of listings, the historic parks and gardens and the historic farmsteads, is an efficient way of populating the local list at an early stage, given the work undertaken already by KCC, Kent Gardens Trust and Historic England to identify their heritage significance. Again, reuse of historic farmstead buildings can ground developments in being responsive to their context, and if sensitively converted is a sustainable method for delivering homes.

6.3. Whilst there is currently no policy requirement to produce a list, and therefore no time pressures, given the current cross departmental work on heritage and a Heritage Strategy, and the mentorship from Historic England whilst Medway is designated as a 'Priority Place', it is an opportune moment to begin to work on an inclusive, wide ranging appreciation of Medway's local heritage as enabled by the selection criteria. Delaying could risk losing input from Historic England.

7. Risk management

7.1. Risk management is an integral part of good governance. The Council has a responsibility to identify and manage threats and risks to achieve its strategic objectives and enhance the value of services it provides to the community. Using the following table this section should therefore consider any significant risks arising from your report.

Risk	Description	Action to avoid or mitigate risk	Risk rating
Missed opportunity as one of Historic England's 'Priority Places'	Miss the opportunity of raising the profile of Medway's local heritage and giving communities opportunities to conserve what is important to them, following Historic England advice and in support of the Submission Local Plan.	Publish criteria and initial list, ensuring that the process, which will involve several stages, is started in good time.	DIV

For risk rating, please refer to the following table:

Likelihood	Impact:
A Very likely	I Catastrophic
B Likely	II Major
C Unlikely	III Moderate
D Rare	IV Minor

8. Consultation

8.1. Initially, the 2025 Medway Heritage Audit, carried out as part of the National Lottery Heritage Funded Heritage Place programme, included consultations with the public and heritage sector on the value and themes of heritage in Medway. The results of the Heritage Audit demonstrate that there is public appetite for valuing intangible heritage locally.

- 8.2. The local heritage asset selection criteria were circulated within the Planning Department for comments. Minor amendments were made following feedback from colleagues.
- 8.3. Historic England were consulted on the aims of the project in terms of bringing in ways to identify intangible heritage, in line with the forthcoming Heritage Strategy, and were supportive.
- 8.4. The Senior Conservation Officer has presented to the Portfolio Holder for Climate Change and Strategic Regeneration, the Portfolio holder for Housing and Homelessness and the Chair and Vice Chair of the Planning Committee to present the criteria and the process, and to discuss the potentials. The presentation was supported by those Members.
- 8.5. The Senior Conservation Officer attended Divisional Management Meeting on 3 February 2026 to present the criteria and process to service managers in the Culture and Community Division, and it was well received, with suggested plans to link any work on local nature reserves and the Kent local nature recovery strategy where appropriate.

9. Climate change implications

- 9.1. [The Council declared a climate change emergency in April 2019](#) - item 1038D refers and has set a target for Medway to become carbon neutral by 2050.
- 9.2. Reuse of buildings can form a very important part of adapting to climate change, by retaining their embodied energy and retrofitting for better thermal efficiency. The Senior Conservation Officer regularly liaises with the Climate Response Team on any work that may be relevant, such as providing advice to homeowners on practical retrofitting advice. Links to advice on this topic, such as Historic England's technical guidance, will be included on the webpage.

10. Financial implications

- 10.1. The project can be produced and managed within existing officer resources, and use of online communication or attendance at existing community or other meetings, with limited printing costs if necessary.

11. Legal implications

- 11.1. The list will build on policies in the Development Plan (including the Local Plan and Neighbourhood Plans) and help to support consideration of non-designated heritage assets in the consideration of planning applications and production of supplementary planning documents such as masterplans, and

development briefs. As such the list will help to defend challenges to decisions on such planning applications

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Appendices

- A Draft Medway Local Heritage Asset Selection Criteria
- B [List and Map of Kent Gardens Trust Historic Parks and Gardens in Medway](#)
Further information can be accessed via the link above this website address
<https://www.kentgardenstrust.org.uk/research-project/medway/>.
- C List and Map of Historic Farmsteads identified on the Kent Historic Environment Record, excluding those noted on the HER as no longer being in existence.

Background papers

[Medway Local Plan Heritage Asset Review](#)

[Historic England Advice Note 7: 'Local Heritage Asset Lists'](#)