

# **Non-designated Heritage Assets Supplementary Planning Document Consultation Statement**

**September 2024**

## **1.0 Introduction**

1.1 This Consultation Statement has been prepared in accordance with Regulations 12 and 13 of the Town & Country Planning (Local Planning) (England) Regulations 2012 and the council's Statement of Community Involvement.

## **2.0 What was consulted upon?**

2.1 The Non-designated Heritage Assets Supplementary Planning Document (SPD) was subject to a six-week period of consultation between 3 June and 14 July 2024.

## **3.0 Why is the SPD needed?**

3.1 The Non-designated Heritage Assets SPD sets out guidance defining what non-designated heritage assets are in the context of national and local planning policy and establishes a selection criteria against which the county's non-designated heritage assets are to be identified and assessed, in support of Policy 44 of the County Durham Plan. It includes the following:

- procedure for identifying non-designated heritage assets;
- assessing the impact of development on non-designated heritage assets (decision making on planning applications);
- identification criteria;
- selection and ratification process;
- access to information;
- process for nominations and deletions; and
- limitations to identification.

## **4.0 Area of coverage**

4.1 The SPD covers the whole of County Durham.

## **5.0 First Stage of consultation**

### *Steps the council took to publicise the draft SPD*

5.1 The council publicised the draft SPD by:

- a) emailing consultees on the planning policy consultation database;

- b) publicising via the council's online consultation portal;
- c) making hard copies available in Durham County Hall and Customer Access Points;
- d) making the SPD available on the council's website;
- e) online events;
- f) using the council's corporate notifications and social media outlets; and
- g) press release.

### Outputs from online events

5.2 Two online events were held during the first stage of consultation. These were scheduled for Monday 8 July between 6pm and 8pm and Wednesday 10 July between 2pm and 4pm. Despite additional promotion of the events the week before, just two attendees joined the online events. These took the format of a presentation followed by a questions and answers session, which covered issues around the scope of assets that could come under consideration and the process for identifying assets and local listing. Discussions have continued in relation to an emerging neighbourhood plan group and their ambitions to identify local heritage assets in their neighbourhood plan.

### Formal responses to the consultation

5.3 Eight representations were received to the formal consultation from nine organisations and individuals. These are set out in full with the council's response in Appendix A. Representations were made by:

- City of Durham Trust
- Durham University
- Friends of Stockton and Darlington Railway
- Historic England
- Lanchester Parish Council
- Natural England
- Sunderland City Council
- The Coal Authority

5.4 In summary responses included the following key comments:

- a) Generally comments were supportive of the principle and aims of the SPD, however some changes were requested by four consultees to tightened it up in some areas, for example clarifying how the process works alongside neighbourhood plans (some of which identify local heritage assets), detail required including in relation to the scoring process, and landscape assets and process matters, and recognition required in relation to specific heritage assets.

- b) The City of Durham Trust made detailed comments including in relation to the landscape section to better define what NDHAs are.
- c) The Trust requested that more detail be included around the process for identifying NDHAs, and that when the County Durham Plan is reviewed policy should include requirement for producing local lists.
- d) The Trust submitted detailed recommendations around the identification criteria to specifically focus more on landscape assets.
- e) They made further representations around the scoring process to make it more robust and transparent and queried how the criteria for NDHA status interrelate with UNESCO's Intangible Cultural Heritage convention.
- f) Durham University submitted a number of points including to clarify the planning implications of local listing including in relation to planning permission.
- g) They noted that the University would like to work with DCC to identify a list of their assets, and requested that further guidance is provided on how the list is reflected in conservation area appraisals.
- h) The University noted concerns in terms of whether NDHA status may add delays to the planning application process.
- i) The Friends of Stockton and Darlington Railway requested confirmation that undesignated sites identified in the Historic Environment Audits for the S&DR (2016), the Haggerleases Branch Line (2022), the Black Boy Branch Line (2023) and the forthcoming Surtees Branch Line will be automatically recognised as Non-Designated Heritage Assets.
- j) Lanchester Parish Council commented on the need for clarity on how local heritage assets identified in neighbourhood plans will be considered in relation to the criteria set down in the SPD. They also noted some inconsistencies in the scope and approach of the SPD and that adopted for the heritage work undertaken during the preparation of the Lanchester Neighbourhood Plan.
- k) The Parish Council further noted that clarification is required to distinguish between heritage, non-heritage, local and locally valued assets, as well as further clarity being required in relation to the scoring system in the SPD.

### Changes to the SPD

5.5 Following consideration of the feedback received a number of changes were made to the SPD. Key changes include:

- a) Clarification has been added to confirm that the SPD will not be applied retrospectively to previously identified assets, specifically those within neighbourhood plans. The SPD will not undo previous community work in identifying NDHA.
- b) Considerable additional detail has been added giving examples of assets which may fall under each asset type.
- c) Additional clarity has been added around the scoring criteria especially the threshold for assets being identified as NDHA and when they may be considered for the local list.

- d) Clarification has been added around the legislative and policy context of archaeology and the lower threshold for being identified as NDHA has been explained in greater detail.

## Appendix A – Formal consultation responses stage 1

Respondent	Page/ Paragraph	Comment	DCC Response
City of Durham Trust	General	<p>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.</p> <p>This SPD covers all the appropriate aspects of the definition, identification and selection of non-designated heritage assets (NDHAs). However, the Trust feels that in places it lacks necessary detail and clarity.</p>	<p>Noted.</p> <p>Addressed below.</p>
	1/1.2	<p>Setting the background rightly says that local heritage is the make-up of our town and cities. We are pleased that subsequently the draft also recognises that local heritage includes landscape. However, this section needs much more explanation and context to clearly define and describe what NDHAs are. The SPD needs to make clear the difference between a designated and non designated asset and that such assets are not just found in a conservation area. The bulleted list of what NDHAs can include needs expansion. For example buildings would include parts of a building like a facade, a wall etc. and cover both domestic and 'commercial' and 'industrial' uses. Monuments would include works of art, milestones, etc. The definition of "areas of landscape" in particular needs much more detail. Are green and blue assets included? How much of a landscape, e.g. a significant clump of ancient trees or the broad sweep of the inner bowl of the WHS? It would presumably include footpaths such as</p>	<p>The difference between designated and non-designated assets has been added including a list of designated assets taken from the HE guidance. Clarity has also been added to state that NDHA can be found anywhere and not only in historic areas which have previously been identified. The bullet pointed list of potential types of NDHA has been expanded to elaborate on what might be included and a caveat added to say that this list is not exhaustive.</p>

Respondent	Page/ Paragraph	Comment	DCC Response
		ancient pilgrim and livestock routes into Durham e.g. Clay Lane etc.	
	4/2.5	Assessing the Impact of Development on NDHAs. The Trust welcomes the recognition that NDHAs are an important element of the heritage protection system. In the City of Durham there are potentially hundreds of NDHAs. It is very important that an NDHA should be fully and appropriately considered for all proposals for change within planning applications.	Noted, that is the intention of the SPD and the work currently underway with City of Durham Parish Council and the Trust to appropriately identify NDHA in the CAMP process.

Respondent	Page/ Paragraph	Comment	DCC Response
	6/3.1	<p>Decision making on planning applications. "Non-designated heritage assets may be identified by the local planning authority during the decision-making process on planning applications as evidence emerges." More detail is needed on how this is done. Can e.g. a member of the public identify an asset being affected by a planning proposal as an NDHA, and if so how do they do this? Note: p.11. Section 4.1 Selection and Ratification Process needs more detail, e.g. the process for different groups, e.g. members of the public/community groups, council staff. The Trust does certainly on occasions make reference to a property comprising a NDHA when making an objection to a planning application. If such property or feature is not already on the List then the Trust feels there should automatically be a determination by the local planning authority whether this is an NDHA and, if it is so determined, included in the Local List. That could be made clear in Section 3.1. However, the process in this section appears to be contradicted on p. 12. 4.4 Limitations. "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." The process for identification of NDHAs through the planning process needs far clearer details as this is stated to be the main way NDHAs will be identified.</p>	<p>The following text has been added to clarify that any group or individual can identify a potential NDHA in the planning process and what will happen in such a case:</p> <p>"The potential that an NDHA may be affected by a planning application can be highlighted by any group or individual in the planning process as part of representations. On receipt of a suggestion that an NDHA is affected, if this is previously unidentified then an assessment will be carried out by the Durham County Council Conservation Team to ensure the criteria of this SPD are met."</p> <p>This applies to adding items to the local list only as part of the planning process not identifying them as NDHA. If the NDHA still meets the criteria to be added to the local list following the outcome of a planning application or appeal it will be added accordingly.</p>

Respondent	Page/ Paragraph	Comment	DCC Response
	7/3.2	Local and Neighbourhood Plans. The Trust welcomes the inclusion of these plans and the recommendation that as such plans are being produced they should include the identification of NDHAs.	Noted.
	9/3.4	Local Lists. We recommend that the requirement for producing local lists is included in the revision of Policy 44.	To be considered at the appropriate point in the County Durham Plan Review process but acknowledged requires attention.
	10/3.5	<p>Identification Criteria</p> <p>As well as the need for a more detailed definition of "areas of landscape" there is insufficient detail in the criteria for such assets. The Historic England Listing Selection Guides for Parks and Gardens covers the built structures within them not the landscape or green assets as such. The criteria headings following could include landscape assets e.g.</p> <ol style="list-style-type: none"> <li>1. Age and Rarity - landscapes that have been in existence for a long time. e.g. Observatory Hill; landscapes can have rarity value, e.g. the landscaped gardens on the peninsula reflecting the ideal of a romantic landscape</li> <li>2. Group Value – Landscape assets by their nature contribute to the setting of other historical assets.</li> <li>3. Architectural or Artistic Interest - Landscape assets are clearly of artistic interest, e.g. iconic views of the WHS.</li> </ol>	As the criteria is to cover all kinds of assets, detailed reference as suggested to one would require the same for all which would make the SPD too length and prescriptive. Advice is constantly available via the DCC Design and Conservation Team as to what assets and parts of assets may be accommodated within the process.



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		<p>4. Historic Interest - Landscape assets are of historic interest, e.g. the peninsula riverbanks, Observatory Hill. They can be of intense importance to local people reflecting their sense of place and historic connection to the locality where they live, e.g. the importance people feel towards the green setting of Durham City and the green 'fingers' reaching from the countryside into the city. They can be settings of important historical events (both in the past and currently) e.g. the racecourse and the Miner's Gala, Durham Regatta and the river.</p> <p>5. Archaeological Interest - Landscapes assets can demonstrate the past use of the land, e.g. remnants of old agricultural practices, such as field structures and stock routes.</p>	
	16/App1	<p>Criteria  Additions (We assume that if not specified, these criteria cover all types of assets. However, where examples are given they currently do not include landscape assets):</p> <ol style="list-style-type: none"> <li>1. Age and Rarity – to determine the age or rarity of the asset.  Add to AR 1. If a landscape asset, estimate how long it has existed in its current form, and outline its changing nature over time.</li> <li>Add to AR 7. Is it a locally important landmark building, folly, or curiosity, or a locally important landscape asset?</li> <li>3. Architectural or Artistic Interest  Add AA 11. A landscape asset of artistic value</li> <li>4. Historic Interest  Add</li> </ol>	<p>See comment above, criteria are to apply to all types of assets and therefore do not single out landscapes. The sub questions suggested will inform the answers to the criteria questions posed.</p>

Respondent	Page/ Paragraph	Comment	DCC Response
		<p>H1: Events or significant phases or landscape assets in local history.</p> <p>H5: Strong community significance (e.g., civic buildings, schools, community halls, libraries, landscape assets)</p> <p>H6: Locally famous or notable people or events or landscape assets</p> <p>H7: County Durham's social, economic, and physical development and history such as schools, churches, leisure, and entertainment, commercial and employment. Durham's former agricultural heritage and industrial heritage such as mining (of all resources), and railway history should be reflected here.</p>	

Respondent	Page/ Paragraph	Comment	DCC Response
	11	<p>Scoring process.</p> <p>Much more detail of the scoring process is needed. A scoring process needs to be transparent and robust. Criteria, and quality and significance, are related but are not identical. The criteria identify the type of asset and its characteristics. However scoring an asset's significance cannot be simply the number of criteria that it meets. Assets differ in their nature (i.e. on p. 1 the bulleted list of 5 types of NDHAs). One type of asset may not meet many criteria but be of high quality or great significance. Another type of asset might meet a large number of criteria but not be of sufficient quality to be scored at the highest level. Additionally, at the stage where heritage assets of high significance are to be considered for putting forward for the local list or the national list, there might also be other, non-heritage, designations that the asset could also be considered for, e.g. a public right of way (PROW), wildlife site etc.</p>	<p>The scoring process has been tested and refined prior to publication. It is aimed at identifying significance not quality.</p> <p>The purpose of the SPD is to assist in the identification of NDHA not other designations. Other processes already exist to secure the designations suggested.</p>

Respondent	Page/ Paragraph	Comment	DCC Response
	11/4.1	<p>Selection and Ratification Process  "ensuring the property is not covered by other designations". This could be explained further. Does this mean that if an asset already has a designation it cannot be considered for NDHA status? This seems appropriate if the existing designation is a 'heritage' one, e.g. listing by Historic England, but not if the existing designation is for another, non-heritage, aspect of the asset, e.g. for its biodiversity status, or because it is a PROW.  We welcome the inclusion of community representatives in the selection panel.</p>	<p>Clarification added that this only refers to another heritage designation.</p>
	11/4.2	<p>Access to Information  As the main route for identification of NDHAs will be decision-making on planning applications then it is very important that publicity about the process is shared widely with local groups of all kinds.</p>	<p>Noted.</p>
	16/App1	<p>Criteria  See our comments above on this topic.  Additionally, how do these criteria interrelate to UNESCO's Intangible Cultural Heritage; the UK is now a signatory to this convention. Intangible cultural heritage can interrelate to objects and places, e.g. the Racecourse and the Miners Gala. Some of the NDHA criteria seem to have aspects of intangible cultural heritage. As a process of identifying our intangible cultural heritage in County Durham gets underway a linkage with the identification of NDHAs would be of benefit.</p>	<p>The intention of the SPD is to allow the identification of intangible heritage with greater ease especially that with localised significance. Links to local events traditions and activities will strongly support this.</p>

Respondent	Page/ Paragraph	Comment	DCC Response
The Coal Authority		No specific comments to make.	Noted.
Durham University		<p>The publication of procedures and criteria used to determine whether assets are to be defined as NDHAs is helpful and welcome.</p> <p>It would be helpful for the document to make clear that local listing does not bring any additional planning controls, whether through legislation or policy – perhaps a ‘step-by-step’ flowchart could be added to help explain when the harm / benefit balancing exercise is typically invoked through the planning process.</p> <p>In relation to the point above, again for clarity it would be helpful if the document can provide examples of where the alteration of an NDHA could require planning permission and therefore be subject to the local and national policy controls cited.</p> <p>It would be helpful for the University to work with DCC to agree a list of which University assets, in addition to those already formally identified through local listing and previous planning applications, would be regarded as NDHAs.</p>	<p>No comment necessary</p> <p>First 2 paragraphs of section 2.5 altered to include explicit reference to the fact that being an NDHA imposes not direct planning controls. NPPF reference added to address necessary balance in the planning process.</p> <p>This would add undue complexity to an SPD aimed at identification and the process following identification. To provide examples may suggest that only those elements included in the examples require consent and that would be misleading. Enquiries regarding the need for planning permission should be routed through the DCC pre application process.</p> <p>This has been agreed with Durham University and will be facilitated initially through the production of a CAMP for the conservation Area and also through the preparation of agreed management principles for the university estate. No amendments necessary.</p>

Respondent	Page/ Paragraph	Comment	DCC Response
		<p>Please provide clarification if lists of NDHAs provided as part of conservation area appraisals (see page 8) are to be regarded as comprehensive within the confines of the relevant conservation area.</p> <p>Please provide clarification of whether a ‘positive contributor’ to a conservation area automatically be regarded as an NDHA, it is presumed not if they are only of moderate significance but clarification of this within the document would be useful.</p> <p>There could be potential risk of delays in the decision-making process of a planning application with assessment of potential NDHAs during the planning application process (page 11). Please can clarification in the document be provided as to how this would be mitigated.</p>	<p>Lists provided in any current or future appraisal will not be definitive and further NDHA could be identified as part of the planning process. Every effort has been made to produce comprehensive lists but omission should not be considered to preclude future identification. Durham University has been advised of this.</p> <p>Assets assessed as reaching 0-5 criteria can be identified as positive contributors but will not be considered NDHA, a minimum of 6 criteria must be met to meet this level. This has been clarified with revised wording in Section 3.5 in text following the criteria scoring table.</p> <p>Assessment of NDHA already happens as part of the decision-making process. Clarification has been added to section 4.1 to confirm that assessment will continue to be undertaken within the consultation timescales on any application.</p>
Friends of Stockton and Darlington Railway		<p>The document was reported to the meeting of the Friends of the S&amp;DR on 4 July. The meeting welcomed the SPD but expressed concern that many of the sites previously forwarded to the Council have not been entered on the Historic Environment Register.</p> <p>Paragraph 4.572 of the adopted County Durham Plan states: <i>Any proposal for development of a S&amp;DR related designated or non-designated heritage asset associated with the route must be informed by the S&amp;DR Historic</i></p>	<p>The audits referred to have been provided to the DCC HERO. These are yet to be assessed against the emerging criteria or added to the HER in detail. Each will be assessed against the criteria before any decision is reach on their status as NDHA, however, it is anticipated given the significance of the S&amp;DR that the majority, if not all will be added.</p>

Respondent	Page/ Paragraph	Comment	DCC Response
		<p><i>Environment Audit, the research outcomes published as part of the Heritage Action Zone.</i></p> <p>In view of this, the Friends would be pleased if you would confirm that undesignated sites identified in the Historic Environment Audits for the S&amp;DR (2016), the Haggerleases Branch Line (2022), the Black Boy Branch Line (2023) and the forthcoming Surtees Branch Line will be automatically recognised as Non-Designated Heritage Assets.</p>	

Respondent	Page/ Paragraph	Comment	DCC Response
Historic England		No specific comments to make.	Noted.
Lanchester Parish Council	General	1. (critical) The SPD needs to state how it will be applied to 'retrospectively fit' and be 'backwards compatible' for heritage assets which have been explicitly identified by agreed/approved methodologies and organisations which will probably not meet 100% the	Additional paragraph added within section 1.2 Background, to clarify that there is no retrospective application of the SPD, previously identified heritage assets remain unchanged if they have been identified through an appropriate process. Only if previously identified assets form part of the planning



Respondent	Page/ Paragraph	Comment	DCC Response
		<p>details NOW proposed in this SPD – and importantly are valid to be used when assessing heritage asset.</p> <p>2. (critical). The SPD is quite weak in several areas in the detail included about Neighbourhood Plans. REVIEW, USE and TEST the SPD against ALL of the contents of the Lanchester Neighbourhood Plan (LNP) to rewrite sections as required including more comprehensive information – evidence, research, NECT methodology and processes, Community Heritage Audit, Heritage Gazetteer, Locally Valued Heritage Assets (LVHA), maps, lists and policies</p> <p>3. The distinction between heritage, non heritage, local and locally valued assets must be explicitly stated and defined</p> <p>4. Scoring system requires more work (see comments below). Each stage needs to be detailed explicitly in the SPD. Currently, it is unclear as to how it all works, and adds up...from start to finish...</p>	<p>process in the future may they be considered against the new criteria for consistency.</p> <p>The SPD is intended to provide a uniform approach to the issues outlined, not reflect the approach of one Neighbourhood Plan process, the requested changes based on the Lanchester Plan are not therefore appropriate (notwithstanding the quality of the process undertaken).</p> <p>The following text has been added in Section 1.2 to clarify the various terms previously used under the umbrella of non-designated heritage assets:  “The term non-designated heritage asset is the formal term used in planning guidance and policy but can encompass assets referred to as Locally values heritage assets, locally listed assets and many other references to local heritage which do not meet the definition of designated assets.”</p> <p>Further clarity on designated assets has also been added to ensure the difference is clear.</p> <p>See detailed comments below.</p>

Respondent	Page/ Paragraph	Comment	DCC Response
	4/2.4	<p>Neighbourhood Plans. Greater clarification and a more comprehensive introduction as to what NPs might contain relating to Heritage Assets MUST be included here. Refer to LNP for more detailed insights [see General2 above].</p> <p>Reference must be made in the text to evidenced research undertaken for NPs which may include, working with industry bodies and the community, audits, evaluation, photography, lists, maps and policies.</p> <p>NPs may include designated, non designated and locally valued heritage assets.</p>	<p>See point 2 above.</p> <p>The following text has been added to Section 2.4 to highlight neighbourhood plan good practice:  “Neighbourhood plans have used different wording and approaches to the identification of non-designated heritage assets in the past along with different methods of identification. Much can be learnt from the positives including working with industry bodies or specialists on criteria and identification, the proactive involvement of communities in implementing these, audits, evaluation, photography standards, lists and descriptions, maps and resultant policies. This SPD is intended to allow for such variations to be set within a more structured framework but not replace the positive approaches already established and the previous examples of good practice.”</p>

Respondent	Page/ Paragraph	Comment	DCC Response
	5/2.5	2nd para. 1st sentence. Also INCLUDE text 'Neighbourhood Plans'	Section 2.5 amended as follows to include two references to neighbourhood plans: "The highlighting of NDHAs through means such as neighbourhood plans, conservation area character appraisals or local lists can also help increase the profile of local heritage by identifying heritage assets which are of importance to local communities. In addition, the NPPF also highlights the contribution of NDHAs to the development of the evidence base used to support local plan making and the preparation of neighbourhood plans."
	7/3.2	Also include text about '...evidenced heritage asset research, audits, lists, photography, maps and policies...'	See additions in Section 2.4

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	7/3.2	State how heritage assets identified earlier than this SPD to be treated, weighted and considered at planning stage. This should include 'locally valued heritage assets' (LVHA) [LNP good example]	The following text has been added for clarity: "Assets previously identified within Neighbourhood Plans will not be affected unless they arise within the planning process in the future, at this point they will be reassessed based on any changes of circumstance against the criteria set out within this SPD."
	10/3.5	Clarify how this new SPD methodology fits / matches / compares with recognised methodologies of others (eg NECT/LNP) and how work of others will be evaluated / valued and NOT JUST DISCARDED within this NEW SPD process.  How do you intend to ensure consistency and consideration where processes of others may vary. [DCC not able to dictate all processes to others]	See comments above.

Respondent	Page/ Paragraph	Comment	DCC Response
	11/3.5	Scoring. We support a simple approach. However, this might appear over simplistic and may not do full justice to some applicants where a 'simple score' is applied too eagerly to an asset's detriment. [See process undertaken by NECT/LPC for LNP] Also see note 8 below.	The SPD is intended to provide a proportionate and consistent approach to identification which has been simplified so as not to require undue levels of research or delay the planning process unduly as a means of early identification. The appropriate level of research and understanding will be provided through any associated heritage statement, therefore such detail is not required within the SPD.
	11/3.5	'...achieving upper end... considered in more detail....' doesn't make sense. Wording unclear, requires clarification. What EXACTLY is upper end (score)? What does 'considered in more detail' mean?	Text amended as follows to clarify wording: "Given the historic and architectural heritage of County Durham it is highly likely that many items will achieve a score in the assessment process and as such it is necessary in to set a benchmark to ensure the designation is not undermined. Those items assessed as meeting between 0-5 criteria may have no, low or moderate significance, in these circumstances for the purpose of the planning process they will not be identified as NDHA. Those assets achieving a score of 6-9 and having high significance in the local context

Respondent	Page/ Paragraph	Comment	DCC Response
			will be identified as NDHAs. Those achieving the upper end of the band (8-9) will be considered in more detail as possible additions to the local list subject to further research, consultation and reassessment.”
	16/App1	<p>(CRITICAL) It is unclear HOW Qs and ANSWERS for each of the headings are scored and then weighted. Greater explicit clarity required here of EXACT PROCESS and how each HEADING SCORED and then WEIGHTED. Are Questions in Appendix JUST examples are MUST THEY ALL BE ANSWERED?</p> <p>Is EACH heading equal or a some headings weighted more than others?</p> <p>How do you get from Appendix1 Questions to total Criteria Score of up to 10. CLARIFY WHOLE PROCESS. You need to show each stage of process explicitly – does it need a matrix style of presentation?</p> <p>HOW DOES SIGNIFICANCE in CRITERIA EXPLICITLY link to answers to App1 Questions. CURRENT PROCESS UNCLEAR and DOES NOT MAKE COMPLETE SENSE</p>	<p>There is no weighting it is a simple numeric count as to how many of the criteria set out are met this gives the total which gives the heritage significance.</p> <p>The criteria set out in Appendix 1 relate directly to further text in the body of the SPD - 3.5 Identification Criteria.</p>
Natural England		No specific comments to make.	Noted.

<b>Respondent</b>	<b>Page/ Paragraph</b>	<b>Comment</b>	<b>DCC Response</b>
Sunderland City Council		No specific comments to make.	Noted.