

Appendix 5: Guidance for preparing a Heritage Statement

WHAT IS A HERITAGE STATEMENT?

The foundation of planning policy nationally, including heritage issues, is the National Planning Policy Framework (NPPF) introduced in 2012 (see <https://www.gov.uk/government/publications/national-planning-policy-framework--2>).

Guidance to help applicants meet the demands of the NPPF regarding heritage is contained in the accompanying National Planning Policy Guidance (NPPG, see <http://planningguidance.communities.gov.uk/>) and advisory publications produced by Historic England, a public body sponsored by the Department for Culture, Media and Sport (see <https://historicengland.org.uk/advice/>)

A **Heritage Statement** is an assessment of the significance of heritage assets and/or their settings affected by a development, and of the impacts of that development upon them.

A **Heritage Asset** is 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.” The term “heritage asset” includes designated heritage assets and non-designated assets identified by the local planning authority (including local listing).

The purpose of Heritage Statements is set out in paragraph 128 of the NPPF, which states:

“In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.”

WHAT IS THE PURPOSE OF A HERITAGE STATEMENT?

Quite apart from the need to comply with the NPPF, the Heritage Statement is an important practical tool to guide an applicant in developing their proposals. As good practice, it should therefore be one of the first things that an applicant considers when beginning to formulate their development proposals.

In other words, the needs and constraints of the identified heritage asset(s) should influence the evolution of a proposal from the outset, and a Heritage Statement should

explain how an applicant/agent has arrived at a certain proposal. Good understanding of the heritage asset(s) is essential before that process can take place.

Heritage Statements do not achieve their full purpose or value if they are prepared only between finalising plans and submitting them to a local planning authority.

WHEN IS A HERITAGE STATEMENT NEEDED?

A Heritage Statement is required with all development proposals requiring planning permission or listed building consent, when the proposal directly involves, or affects the setting of, a “heritage asset” Some proposals will affect more than one asset, so the statement should address them all.

Heritage assets may be “designated” (i.e. they have been formally assessed and recognised as heritage assets under national designation regimes) or “non-designated” (i.e. identified by or through a local authority and acknowledged at a local level).

Heritage assets, designated under the relevant legislation, comprise:

- World Heritage Sites,
- Scheduled Monuments,
- Listed Buildings,
- Protected Wreck Sites,
- Registered Parks and Gardens,
- Registered Battlefields and
- Conservation Areas

Non-designated heritage assets will typically be buildings, archaeological sites and historic parks or gardens that have value but have not yet been assessed or are of insufficient quality to merit designation at national level.

In practice, compilation of a Heritage Statement will be applicable to the following types of proposal:

- Development requiring listed building consent
- Development within the curtilage of a listed building
- Development within or adjoining Conservation Areas
- Development affecting a Registered Park or Garden of Special Historic Interest
- Applications affecting an unlisted building on the Historic Environment Record (HER).
- Applications affecting non-designated heritage assets identified by the Peak District National Park Authority during its consideration of applications. In these circumstances, the Authority accepts that a Heritage Statement may have to follow the rest of the application particulars, or that a submitted heritage statement may have to be amended. Pre-application discussion is encouraged and can enable such assets to be identified at an early stage.

Summary information on most of the sites listed above can be found online via the following sources:

Details of Conservation Areas in the Peak District National Park can be found at:

<http://www.peakdistrict.gov.uk/looking-after/living-and-working/your-community/ca/caa>

Details of registered parks and gardens, listed building and scheduled monuments can be found at:

<https://historicengland.org.uk/listing/the-list/>

Information about non-designated heritage assets can be found at: www.heritagegateway.org.uk (select “Historic Environment Records” from the menu). N.B. data from this website is not appropriate for inclusion in planning applications. Where full and up-to-date HER data is required, the relevant HER officer should be contacted in Derbyshire, Staffordshire and Cheshire, Greater Manchester, West Yorkshire and South Yorkshire.)

Other material, notably photographs, additional details of parks and gardens, and details of archaeological sites and finds on the National Trust’s estates, can be found in other sections of www.heritagegateway.org.uk

Historic England’s website <https://historicengland.org.uk> is an invaluable source of background information and advice. Advice Note 2 “Making Changes to Heritage Assets” (February 2016), Good Practice Advice Note 2 “Managing Significance in Decision Taking in the Historic Environment” (March 2015), and “Conservation Principles, Policy and Guidance” (April 2008) are particularly relevant to heritage statements and their place in the planning system.

N.B. Where a Heritage Statement is required and is not included or is lacking in content, the Local Planning Authority may:

- Refuse to register the application until sufficient information is provided;
- Formally ask for additional information under the Planning Regulations, and defer considering the application until such information is received;
- Refuse the application or request that it is withdrawn.

WHAT SHOULD BE INCLUDED IN A HERITAGE STATEMENT?

There is no prescribed format for a Heritage Statement and it does not have to be a freestanding document. Sometimes a Heritage Statement will be amalgamated with other documents such as a schedule of works, a design and access statement, or drawn details that may expand on the content of submitted drawings.

It is for the applicant or agent to decide whether it is appropriate, in the circumstances, to amalgamate the documents or keep them separate. So long as the content of the document is made clear in the title, it makes no difference to the validation of an application by the Authority.

Well-captioned photographs and other illustrations are very useful as a substitute for plain text, and can help to keep a statement concise and to the point.

In practice, and to satisfy the information requirements, a Heritage Statement will normally have three main parts:

- (1) The first part should identify and describe all the heritage assets that may be affected by the proposed development, with an assessment of their heritage significance. The description should normally go beyond simply quoting published material such as a list description or Historic Environment Record (HER) entry, because it should enable the reader to understand the context of the proposals being assessed in the next section.

It should be borne in mind that list descriptions and HER entries are for identification or general indicative purposes only. Except in the case of simple structures, such as mileposts, chest tombs and telephone boxes, they rarely amount to an adequate appraisal of the asset and its evolution.

Except in the case of very minor works, this section should also explain the “significance” of the site, i.e. the value of the heritage asset(s) to present and future generations because of its archaeological, architectural, artistic or historic interest (see NPPF 2012, Annex 2, glossary p56). The nature, level and extent of that significance should be explored (see Historic England Good Practice Advice Note 2, March 2015, paragraphs 8-10).

Significance may not always be clear from list descriptions or HER entries. Close inspection of a building or site often reveals features previously unrecorded, and which sometimes fundamentally alter our understanding of a heritage asset.

- (2) Assessment of impact – this describes the impact of the proposed development, and how it will alter or affect the heritage asset(s) and the setting. In a National Park context, the rural character of the park will be an important material consideration when considering certain planning applications. Questions to bear in mind while writing this section may include some or all of the following:

- a. Does the statement sufficiently explain why the proposals are necessary or desirable?
- b. Does the proposal affect any views looking away from or towards the asset?
- c. If any historic fabric is to be removed or altered, is its significance properly understood and explained in the document?
- d. Are the design details of any proposed new work clearly described in the Statement, to make up for any shortcomings in the submitted plans?
- e. Has a variety of options been considered and why was this option chosen?
- f. Are the works reversible in whole or in part?
- g. If the works have potential to materially affect the landscape character of the National Park, has due account been taken of the Peak District Landscape Strategy and Action Plan (2009)?
- h. If the proposed works will result in any harm, is the harm offset or outweighed by any public benefits?

- (3) A mitigation strategy may be necessary. Sometimes, the mitigation of any adverse effects will have been worked through and resolved by amending or evolving the plans prior to submission, or there may be no mitigation measures necessary (e.g. when the intention of the works is solely to improve, repair or restore).

However, for some categories of work it will be necessary to include a mitigation strategy that addresses the perceived impacts of the proposed development on the significance of the historic asset. This might include modification or explanation of methods and materials, incorporation of planting or hard landscaping schemes, or a scheme of archaeological or architectural investigation and recording. A mitigation strategy may be evolved or modified between the applicant and the National Park Authority during the processing of an application.

CAN I WRITE A HERITAGE STATEMENT MYSELF?

A Heritage Statement needs to be relevant and appropriate, but also proportionate, depending on the scale and nature of the proposal and the heritage asset(s) affected. Small works, of small impact, require only simple heritage statements that can easily be produced without the need for special expertise.

However, in some cases the scale of the proposed development, or the nature and importance of the heritage asset(s) may require the Heritage Statement to be compiled by a suitably qualified professional consultant or contractor, with the necessary skills to assess the effects.

Sometimes, e.g. for large development or redevelopment schemes discussed with the Authority prior to an application being made, additional work may be required such as an archaeological evaluation or analytical building survey. In these circumstances the Authority may offer to supply a brief, outlining its requirements for the Heritage Statement. Examples might include a large factory conversion, a new road scheme, or a new housing development.

If you are unsure about what is required for your Heritage Statement you can discuss your proposals with the Authority's Planning Service or the Cultural Heritage Team (tel. 01629 816200).