Heritage Statements

**Introduction**

Heritage Statements are required as part of the information submitted with planning related applications, when the proposed development might affect an archaeological site, historic building or historic area.

It is a well-established principle of good conservation practice that ‘understanding’ should inform the management of change in the historic environment. One of Historic England’s Conservation Principles is that ‘understanding the significance of places is vital… in order to identify the significance of a place, it is necessary first to understand its fabric and how and why it has changed over time’.

Gaining understanding should not be seen as burdensome, but as a necessary part of the responsible management of change. It should help to avoid negative impacts and be aimed towards achieving creative and sensitive solutions.

Further information on Heritage Statements in included in the Historic England publication; ‘Statements of Heritage Significance: Analysing Significance in Heritage Assets Historic England Advice Note 12’ (2019)

**Why are Heritage Statements needed?**

The National Planning Policy Framework (NPPF) states at paragraph 189 that:

*‘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.’*

In order to meet this requirement, local authorities normally require a Heritage Statement to be prepared to inform and accompany proposals affecting heritage assets.

This guidance has been produced to complement the Lichfield District Council Validation Checklist. A glossary of terms used and sources of further information are included at the end of this document.

**When are Heritage Statements needed?**

A Heritage Statement must be submitted with the following;

* All applications for Listed Building Consent
* All Planning applications that affect a heritage asset and/or its setting.
* Heritage Assets include Listed Buildings, Conservation Areas, Scheduled Monuments, known archaeological sites, and Registered Historic Parks and Gardens; and any non-designated assets which have a local architectural, historic, archaeological or artistic interest, including locally listed buildings and those sites identified on the HER. This includes for the conversion of any pre-1950 individual historic farm building or historic farmstead complex
* Hedgerow removal may also require a Heritage Statement where it forms part of a significant historic landscape or area of archaeological potential.
* A heritage statement will also be required in respect of proposals involving the disturbance of ground within a known area of archaeological significance, a historic settlement core, or, in other areas, the subject of major development proposals or significant infrastructure works, where archaeological remains may survive, as may be specified in pre application advice.

**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 and/or request that it is withdrawn.**

**What should a Heritage Statement include?**

The type and amount of information will vary in each case. What might be needed depends on the nature of the asset and the level of intervention proposed; as the NPPF states, the statement should be ‘proportionate’, and ‘no more than is sufficient’. For example, a major scheme that affects several assets will require an extensive and professionally produced heritage statement. A small-scale scheme that has limited impacts will probably require a short statement.

A Heritage Statement can form part of a Design and Access Statement or a Planning Statement. If this is the case, this should be made clear in the title, for example Design, Access and Heritage Statement.

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

1. Identify and describe all of 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 of a HER entry, because it should enable to reader to understand the context of the proposals being assessed in the following section. It should be borne in mind that list descriptions and HER entries are for identification or general indicative purposes only.

The assessment of the significance of a heritage asset, includes that of their setting. Significance is defined as the value of a heritage asset to this and future generations because of its heritage interest. That interest may be of archaeological, architectural, artistic or historic.

Briefly this should include details of the history and development of the asset, using photographic, map, archival and fabric evidence. It should include, as appropriate, an assessment of the archaeological, architectural, artistic, historic or other significance of the asset. It should be accompanied by a photographic record, showing the site context and spaces and features which might be affected by the proposal, preferably cross-referenced to survey drawings. It should relate to both the overall significance of the asset/s and the constituent parts, with special emphasis on the parts directly affected. It should be noted that an application can affect more than one heritage asset and that the significance and impact of the proposals on each heritage asset should be included in the heritage statement. Cases involving more significant assets, multiple assets, or changes considered likely to have a major effect on significance will require a more detailed approach to analysis.

This assessment should follow the guidance in the Historic England publications ‘Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning: 2’ (2015) and ‘The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3’ (2017).

1. Assess the impact of the proposed development on the significance of the heritage asset(s) and their setting, both overall and with special emphasis on the parts directly affected.

Questions to bear in mind while writing this section may include some or all of the following;

1. Does the statement sufficiently explain why the proposals are necessary or desirable?
2. Does the proposal affect a view looking from or towards the asset(s)?
3. If any historic fabric is to be removed or altered, is its significance properly understood and explained in the document?
4. Are the design details of any proposed new work clearly described in the document to make up for any shortcomings in the submitted plans?
5. Have a variety of options been considered and why was this option chosen?
6. Are the works reversible in whole or in part?
7. If the proposed works will result in any harm, is the harm offset or outweighed by any public benefits?
8. Look for ways to avoid, minimise and mitigate any negative impacts.

This should include a statement providing a clear and convincing justification for the proposed works, explaining why the works are proposed and identifying any public benefits and explaining how harm to significance will be avoided or minimised, with any harm weighed against any public benefits.

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, for example, 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.

In summary, what is needed is an impartial analysis of significance and the contribution of setting. A Heritage Statement is not an advocacy document, seeking to justify a scheme which has already been designed; it is more an objective analysis of significance, an opportunity to describe what matters and why, in terms of heritage significance.

**Who can write a Heritage Statement?**

The Heritage Statement should ideally be prepared by an appropriate professional with the necessary expertise to properly assess the heritage asset and its significance. Small works, of small impact, require only simple Heritage Statements that can be produced without the need for special expertise. For buildings or sites of high significance it is recommended that the statement be prepared by a suitably experienced and qualified historic environment professional such as an architectural historian, an accredited conservation architect, heritage consultant, or archaeologist. Heritage Statements relating to archaeological sites, and particularly those located within historic settlement cores or other areas of high archaeological potential, or are of sufficiently large scale, should be prepared by a recognised archaeological contractor with the necessary expertise to properly assess the archaeological heritage asset(s) and its (their) significance.

It is important that your statement is a balanced, evidence-based assessment of the potential impacts of the proposed development, and should not simply express a personal view on whether the works should be approved.

**What information should be used?**

The statement should show clearly that you have considered all the relevant issues and sought to conserve the significance of the heritage asset(s). Information on any sources and expertise that has been consulted should also be provided.

As a minimum, applicants are expected to consult the Staffordshire Historic  
Environment Record (HER). This is considered to require a full HER search rather than a search of the Heritage Gateway website, which is not considered to be sufficiently detailed or up to date.

It is recommended that Heritage Statements for sites located within historic settlement cores make use of the information contained in the Staffordshire Extensive Urban Survey.

Links to relevant and useful sources of information are below;

* Details of Listed Buildings, Schedule Monuments and Registered Parks and Gardens can be found at:

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

* Information on Conservation Areas in Lichfield District can be found at;

<https://www.lichfielddc.gov.uk/conservation-listed-buildings/conservation-areas/1>

* Information on Locally Listed buildings in Lichfield District can be found at;

<https://www.lichfielddc.gov.uk/conservation-listed-buildings/locally-listed-buildings/1>

* Staffordshire County Council Historic Environment Record: <https://www.staffordshire.gov.uk/environment/Environment-and-countryside/HistoricEnvironment/Historic-Environment-Record.aspx>
* Staffordshire County Council Pre-app Archaeological Advice: <https://www.staffordshire.gov.uk/environment/Environment-and-countryside/HistoricEnvironment/Advice-and-Guidance.aspx>
* Staffordshire County Council Extensive Urban Survey:

<https://www.staffordshire.gov.uk/environment/Environment-and-countryside/HistoricEnvironment/Extensive-Urban-Survey-Project.aspx>

* Staffordshire County Council Farmsteads Guidance: https://www.staffordshire.gov.uk/environment/Environment-and-countryside/HistoricEnvironment/Farmsteads.aspx
* The Heritage Gateway:

<https://www.heritagegateway.org.uk/gateway/>

* Lichfield District Council, *Historic Environment SPD*: <https://www.lichfielddc.gov.uk/downloads/download/231/historic-environment-spd>

# Historic England, *Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment*, 2015:

<https://historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/>

* Historic England, *Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets*, 2017:

<https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>

# Historic England *Advice Note 2: Making Changes to Heritage Assets,* 2016:

# <https://historicengland.org.uk/images-books/publications/making-changes-heritage-assets-advice-note-2/>

* Historic England, *Conservation Principles*, 2008:

<https://historicengland.org.uk/images-books/publications/conservation-principles-sustainable-management-historic-environment/>

* Historic England, *Understanding Historic Buildings, A Guide to Good Recording Practice*, 2016:

<https://historicengland.org.uk/images-books/publications/understanding-historic-buildings/>

* Historic England, *Farmstead Assessment Framework, Informing sustainable development and the conservation of traditional farmsteads*, 2015:

<https://historicengland.org.uk/advice/caring-for-heritage/rural-heritage/farm-buildings/>

* National Planning Policy Framework: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>
* National Planning Practice Guidance:

<https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>

**Glossary**

**Designated heritage asset**A world heritage site, scheduled monument, listed building, protected wreck site, registered park or garden, registered battlefield or conservation area.

**Historic Environment Record (HER)**

Is the principal source of information about the historic environment of Staffordshire and is managed and organised on a computer database, which is combined with GIS mapping technology. The database is an index to fuller information and is supplemented with various types of information, such as plans, photographs, reports, books, maps, etc.

**Non-designated heritage asset**A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions. These shall normally be identified by the local planning authority during the pre-application enquiry stage, during decision-making or through the plan making process.

**Setting**The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

**Significance**The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic.

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