Historic England

Statements of Heritage Significance:

Analysing Significance in Heritage Assets

Historic England Advice Note 12



Summary

This Historic England advice note covers the National Planning Policy Framework requirement for applicants for heritage and other consents to describe heritage significance to help local planning authorities to make decisions on the impact of proposals for change to heritage assets. Understanding the significance of heritage assets, in advance of developing proposals for their buildings and sites, enables owners and applicants to receive effective, consistent and timely decisions.

This advice note explores the assessment of significance of heritage assets as part of a staged approach to decision-making in which assessing significance precedes designing the proposal(s). It also describes the relationship with archaeological desk-based assessments and field evaluations, as well as with Design and Access Statements. Analysis of heritage significance may also be useful in development plan preparation, including site allocations and Minerals and Waste Local Plans.

Front cover: Abbey Mill, Bradford on Avon

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1 Introduction

1 The purpose of this Historic England Advice note is to provide information on the analysis and assessment of heritage significance in line with the National Planning Policy Framework (NPPF) to assist owners, applicants, local planning authorities (LPAs), planning and other consultants, and other interested parties in implementing historic environment legislation, the policy in the NPPF and the related guidance given in the Planning Practice Guidance (PPG). In addition to these documents, this advice can usefully be read in conjunction with relevant Good Practice Advice and Historic England advice notes. Alternative approaches may be acceptable, provided they are demonstrably compliant with legislation and national policy.

2 The advice in this document, in accordance with the NPPF, emphasises that the level of detail in support of applications for planning permission and listed building consent should be no more than is necessary to reach an informed decision, and that activities to conserve the asset(s) need to be proportionate to the significance of the heritage asset(s) affected and the impact on that significance. At the same time those carrying out this work need enough information to understand the issues (NPPF, paragraphs 43-44 and 189).

3 This advice addresses the development of an analysis of heritage significance before discussing suggested structures for a statement of heritage significance.

2 General advice on assessing significance of heritage assets

Significance in the National Planning Policy Framework

National Planning Policy Framework: Conserving and enhancing the historic environment

189. 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.

4 Significance is one of the guiding principles running through the historic environment section of the NPPF. The NPPF defines significance as 'the value of a heritage asset to this and future generations because of its heritage interest'. Such interest may be archaeological, architectural, artistic or historic' and it may derive 'not only from a heritage asset's physical presence, but also from its setting'[1]. Significance is what conservation sustains, and where appropriate enhances, in managing change to heritage assets[2].

[1] See Significance (for heritage policy) – NPPF Glossary.
[2] A variety of terms are used in designation criteria (for example, outstanding universal value for World Heritage Sites, national importance for scheduled monuments and special interest for listed buildings and conservation areas) but all of these refer to a heritage asset's significance.

5 It therefore follows from the NPPF requirement that an understanding of significance must stem from the interest(s) of the heritage asset, whether archaeological, architectural, artistic or historic, or a combination of these; and that this understanding:

- must describe significance following appropriate analysis, no matter what the level of significance or the scope of the proposal;
- should be sufficient, though no more, for an understanding of the impact of the proposal on the significance, both positive and negative; and
- sufficient for the LPA to come to a judgment about the level of impact on that significance and therefore on the merits of the proposal.

A staged approach to decision-making in applications affecting heritage assets

6 In practice developing applications for heritage-related consents will usually mean following a staged approach to decision-making. The development of proposals for change to heritage assets, and the consideration of subsequent applications based on the resultant proposals, benefits from a structured approach to the assembly and analysis of relevant information. A staged approach would usually embrace the following stages, informed by the scope of the proposal:

1. **Understand the form, materials and history of the affected heritage asset(s), and/or the nature and extent of archaeological deposits**

2. **Understand the significance of the asset(s)**

These two stages fulfil the requirement in paragraph 189 of the NPPF and are undertaken by the applicant.

3. **Understand the impact of the proposal on that significance**

This stage fulfils the requirement in paragraph 190 of the NPPF and is undertaken by the LPA. However, the applicant needs to be aware of impacts so that the analysis of significance submitted to the LPA, under paragraph 189, is sufficient in its level of detail.

4. **Avoid, minimise and mitigate negative impact, in a way that meets the objectives of the NPPF**

5. **Look for opportunities to better reveal or enhance significance**

These two stages are addressed by the assessment of impact by the LPA but may also be addressed by the applicant in reaching a decision on the scope and design of a proposal. Indeed, assessment of these three

latter stages by the applicant prior to application may assist a positive assessment of impact by the LPA, thus leading to better outcomes for applicants, reducing both abortive work and delays.

7 This sequence, where design of the proposal follows investigation of significance, is better than the contrary, where proposals are developed and designed before significance has been assessed. Taking decisions about a proposal out of sequence – the staged approach - can lead to abortive work, raised costs and delays. Assessing significance before a proposal is planned can lead to better outcomes for the applicant by influencing the design by mitigating harmful impacts on significance, enhancing significance where possible, and thereby showing how any remaining harm is justified.

8 The NPPF requires only that significance is suitably assessed by the applicant, and does not prescribe a format or title for analyses of heritage significance and/or impact. Analysis of significance, in a statement of heritage significance, is related to wider descriptions of significance and impact, often called Heritage Statements, Heritage Impact Statements, and Heritage Assessments. All of these go further than statements of heritage significance by detailing the impact of a proposal on significance, how it can be avoided, minimised or mitigated, and its justification, if that is not possible, in whole or in part. Statements of heritage significance are an essential component of such statements and may form the first section where the staged approach is taken. Further information on a suggested structure for Statements of Heritage Significance is given in part 3 below.

9 Where potential or actual archaeological interest would justify expert investigation of a heritage asset, an archaeological desk-based assessment and, if necessary, a field evaluation is likely to be necessary. This is considered further in paragraphs 21-23 below. It is worth noting that a building or structure may have archaeological potential, in which case the field evaluation stage is better referred to as archaeological investigation, to avoid confusion (see also the CIfA Standard and guidance for the archaeological investigation and recording of standing buildings or structures).

10 In summary, what is needed is an impartial analysis of significance and the contribution of setting[3]. A Statement of Heritage Significance 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.

[3] The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) contains useful information on assessing the contribution of setting and views to the significance of heritage assets.

Assessing significance

11 Where the significance is not obvious, appropriate expertise would need to be used, as the NPPF points out (paragraph 189). Analysis would generally be undertaken by a suitably qualified specialist, expert in an appropriate branch of conservation, architectural history, garden history and/or archaeology, or, in more complex circumstances, group of specialists, who can describe significance in a way which is acceptable to the local planning authority and which therefore assists a successful application. For further information, see Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning 2, which lists established registers that can be used to identify appropriately qualified specialists or organisations, depending on the nature of the project.

12 Where the potential for archaeological interest has been identified, the approach in paragraph 189 of the NPPF requires an applicant to submit an appropriate desk-based assessment and, where necessary, a field evaluation. The CIfA Standard and Guidance: Historic Environment Desk Based Assessment sets out what information should be included in a desk-based assessment, and the CIfA Standard and Guidance: Archaeological Field Evaluation similarly for evaluations (see also below, paragraph 22). For historic buildings, the Historic England advice note Understanding Buildings: A Guide to Good Recording Practice gives advice towards securing an understanding of the history of a building where conservation, repair or alteration is proposed.

13 The NPPF requirement, for applicants to describe, that is analyse, significance, and on local planning authorities to assess both significance and impact, may best be handled through a simple check-list approach and can usefully take the form of a short narrative statement for each assessment stage.

14 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. Analysis may involve detailed assessment techniques and more complex forms of analysis such as sensitivity matrices and scoring systems. Whilst these may assist analysis to some degree, as significance and impact are matters of qualitative and expert judgement, they cannot provide a systematic answer. Historic England recommends that technical analyses of this type should be seen primarily as material supporting a clearly expressed and non-technical narrative argument that sets out 'what matters and why' in terms of the heritage significance of the assets affected, together with the impact of the proposal upon them. Further information on frameworks for Statements of Heritage Significance is given in part 3 below.

15 Deciding how to analyse heritage significance is likely to depend on the kind of heritage asset concerned, the nature of the proposal and the level of understanding of its history and significance at the time of application, though it is worth bearing in mind that all these approaches may be needed in especially complex cases:

- The context for any analysis of the significance of a heritage asset will be a thorough familiarity with the asset itself, developed through site visits, and appropriate inspection of the fabric, its features, materials and ornament, and also its setting if needed.

- Where the documentary history of a heritage asset is well established, there may be less need for primary documentary research but such research[4], and related fabric, comparative and typological analysis, may be helpful where less is known, and may be augmented, where applicable (e.g. where archaeological interest is part of the significance of a historic building) by following the process in CIfA's Standard and Guidance: Historic Environment Desk Based Assessment (see below and Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning 2, paragraph 12). It is worth bearing in mind that buildings and standing remains may equally have archaeological potential. Even where an extensive documentary history exists, research and related fabric and comparative analysis may still be needed, as also by following CIfA's standard and guidance on desk-based assessment, as above.

Other matters to be considered:

- Opening up and exploratory works to assess the condition of a heritage asset (as mentioned below, paragraph 18) may enable examination of fabric and features otherwise concealed or unknown. It is important to note that such works may in themselves require consent.

- The setting of the heritage asset may contribute to its significance and a landscaped or designed setting may itself need to be interpreted and understood. The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning 3 (Second Edition) contains useful information on assessing the contribution of setting and views to the significance of heritage assets.

- Where development proposals affect conservation areas, further advice on the appraisal, designation and management of conservation areas, including the assessment of special interest, can be found in Conservation Area Appraisal, Designation and Management: Historic England Advice 1 (Second Edition).

[4] Documentary sources, and documentary history based on them, may tell of history from a particular perspective, prioritising particular voices and values, which may therefore distort the accepted history of a building or site.

16 It is worth underlining that a likely approach to reducing the impact on the heritage asset may simply be by designing the works to minimise the impact on significance.

17 In works to heritage assets, it is useful to recognise that the conception of a scheme and its design may not be a linear process; there may be cases where a constructive critique of the resolution of details may suggest changes as a scheme evolves. Design may not stop after works have begun and the statement of heritage significance should not therefore be regarded as final in its consideration of significance; more information may be revealed as the works progress, information which may inform a better understanding of significance in the same way that opening up works to assess condition before works start may also enable examination of the fabric.

Consultation and discussion with the local planning authority

18 The NPPF (paragraph 39) and the PPG (Before submitting an application: The value of pre-application engagement), emphasise the importance of early engagement and pre-application discussion between applicants and their advisors, statutory consultees and Historic England (where appropriate) and local planning authorities. Where the proposal is likely to affect the significance of heritage assets, applicants are encouraged to consider that significance at an early stage and to take their own expert advice. To ensure the assessment will be fit-for-purpose and to avoid unnecessary or damaging works, it is good practice for applicants to agree the precise extent and nature of the statement of heritage significance with the local planning authority before commissioning any work. This may best be carried out as part of pre-application engagement with the LPA. Some invasive assessment techniques may require formal consent, as may opening up and exploratory works to assess condition of fabric; the local planning authority can advise also as part of pre-application discussions.

Sources of information

19 The NPPF requires that, as a minimum, the relevant Historic Environment Record is consulted (NPPF, paragraph 189). Many local planning authorities additionally retain and publish lists of local sources of information which may be helpful in carrying out research on heritage assets. It is good practice to reference any sources of information used in preparation of the statement; this may help avoid lengthy reproduction of information and gives all parties a good understanding of the information consulted during the preparation of the statement.

20 Further information on sources for such Statements can be found in Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning 2 and include:

- main local, county and national records (including the relevant Historic Environment Record)
- statutory designations (these can be accessed via the National Heritage List for England) and local lists
- the thematically-arranged Historic England Selection Guides for listed buildings, archaeological sites and historic parks and gardens, which give a broad overview of building and site types and subject-specific selection principles, and the various Introductions to Heritage Assets which cover archaeological, building and designed landscape topics in more detail
- the Pevsner Architectural Guides to the buildings of the counties of England and the volumes of the Victoria County History
- the records of statutory amenity societies
- the Heritage Gateway
- the Historic England Archive
- other relevant sources of information that would provide an understanding of the history of the place and the value the asset holds for society, for example historic maps, conservation area appraisals, townscape studies or the urban archaeology database, the archives of county and local societies and local record offices and archives
- Information on many buildings will have been published in local journals and other literature and map-based information will be available on historic Ordnance Survey maps

Archaeological evaluation

21 Paragraph 189 of the NPPF, quoted above, notes that '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'.

22 In some cases the need for archaeological investigation will be obvious from material in the local historic environment record or where advice given by local planning authorities' historic environment

advisors suggests that archaeological interest exists. The archaeological interest of the site which leads to this conclusion may be independent of other interests, whether historic, architectural or artistic, but it may be associated in combination – all types of heritage asset may hold archaeological interest. Any archaeological investigation, carried out under CIfA Standard and Guidance: Historic Environment Desk Based Assessment, and/or CIfA Standard and Guidance: Archaeological Field Evaluation or the CIfA Standard and guidance for the archaeological investigation and recording of standing buildings or structures, should be allied closely with investigations by other specialists, where necessary, as, for instance, in the case of a listed building.

23 In order to ensure that the scope of the assessment or investigation meets the requirements of the local planning authority and avoids damage to heritage assets, it is good practice to discuss the scope of the work with the LPA and to agree a Written Scheme of Investigation, if necessary, before commencement, thus precluding abortive work (see paragraphs 34-40 of Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning 2.

Statements of Heritage Significance as part of a Design and Access Statement

24 The PPG outlines where Design and Access Statements are required. They are required for:

- Applications for major development
- Applications for development in a designated area (as defined in section 9 (5) of the Town and Country Planning (Development Management Procedure (England) Order 2015), i.e. in a world heritage site or conservation area), where the proposed development consists of:
    - one or more dwellings; or
    - a building or buildings with a floor space of 100 square metres or more.
- Applications for listed building consent.

25 The PPG provides clear information about what Design and Access Statements are for and what they should include:

- They are intended to be 'concise statements' containing a level of detail proportionate to the complexity of the application.

- Their role as an analytical tool rather than simply a description of what is there is emphasised in its use as 'a framework for applicants to explain how the proposed development is a suitable response to the site and its setting', intended to aid decision-making by 'enabling local planning authorities and third parties to better understand the analysis that has underpinned the design of a development proposal' (Paragraph: 029 Reference ID: 14-029-20140306).

- The format is not prescriptive, but a Design and Access Statement must demonstrate the steps taken to appraise the context of the proposed development and how the design of the development takes that context into account - that is, how an understanding of significance has been derived and how it is addressed in the proposals (Paragraph: 031 Reference ID: 14-031-20140306).

- Design and Access Statements accompanying applications for listed building consent are explicitly required to include an explanation of the design principles and concepts that have been applied to the proposed works, and how they have taken account of:

  a the special architectural or historic importance of the building;

  b the particular physical features of the building that justify its designation as a listed building; and

  c the building's setting (Paragraph: 032 Reference ID: 14-032-20140306).

- Design and Access Statements accompanying applications for listed building consent must also provide information on any consultation undertaken, and how the outcome of this consultation has informed the proposed works (Paragraph: 032 Reference ID: 14-032-20140306).

26 The statement of heritage significance may therefore usefully be included as part of the Design and Access Statement. As an analytical tool, Design and Access Statements can be very useful in showing how a scheme has been designed so that adverse impacts on significance are avoided and/or minimised, for instance in the way the significance of a heritage asset has influenced its treatment or in the way that a proposal avoids or minimises harm otherwise caused to the asset in the way it is designed. Analysis of heritage significance therefore strongly supports the purpose of the Design and Access Statement.

27 Where a Design and Access Statement is required, the statement of heritage significance may form part of the Design and Access Statement, but note that, while the statement of heritage significance may form part of the Design and Access Statement, the Design and Access Statement is not a substitute for it. Indeed, the statement of heritage significance could

be rather more detailed in its analysis of significance, sources consulted, and so forth, and, where the heritage significance of an asset is a primary consideration, it may be appropriate for the analysis of significance and the impact assessment to be a separate document.

Statements of Heritage Significance and the Development Plan

28 As part of the work to ensure that the local plan, minerals local plan or waste local plan has up-to-date evidence of the historic environment, analysis and assessment of the significance of heritage assets and the contribution they make to the environment will be important, particularly in terms of site allocations. Analysis of heritage significance will be useful in assessing whether sites have the capacity to accommodate change/ development as well as suggesting opportunities, including opportunities for enhancement. A sound site allocation is therefore likely to reference heritage assets and their settings, characterisation studies as well as relevant statements of heritage significance, before moving on to consider mitigation of impacts and so forth. The legislative and policy background to such approaches includes:

- the opportunities to draw on the contribution made by the historic environment to the character of a place (NPPF, paragraph 185)
- the need for due regard to legislative requirements (Planning (Listed Buildings and Conservation Areas) Act 1990)
- the requirement to Identify and assess the significance of a heritage asset that may be affected (NPPF, paragraph 190)
- and that great weight should be given to an asset's conservation (NPPF, paragraph 193).

Proportionality

29 While it is important that applicants should take full advantage of opportunities to analyse the significance of their heritage assets, and for local planning authorities to ensure that they have sufficient information to make an appropriate assessment, in the terms of the NPPF, it is also important that the level of detail given in a statement of heritage significance is proportionate to the impact of the proposal. However, while that analysis should be as full as necessary to understand significance, the description provided to the LPA need be no more than sufficient to understand the potential impact of the proposal on significance.

30 Therefore, where, for instance, the scope of the proposal is restricted to a part of a heritage asset, the analysis will assess the significance of the whole of the heritage asset, in as much detail as necessary to define significance, but the statement need only give sufficient confirmation of significance for the LPA to assess impact adequately. For very simple cases, for instance, or those where the impact on significance is minimal, the statement of heritage significance could simply form a part of the covering letter, included with the application for consent. See part 3 for advice about the level of significance/complexity of a proposal and the consequent level of assessment which may helpfully be provided.

31 Where more complex changes are proposed and the statement is begun at the outset of the scheme, it can be used not only to help influence the design but also in negotiation with the local planning authority. In this way, the statement can be used to explain how the proposal evolved and what is intended to be achieved. (See paragraph 195 of the NPPF and paragraphs 018 (Reference ID: 18a-018-20190723) and 020 (Reference ID: 18a-020-20190723) of the PPG).

3 The structure of Statements of Heritage Significance

A suggested structure for a statement of heritage significance

32 This suggested template is given as a generic model to illustrate one way of laying out a statement of heritage significance. In terms of the NPPF, there is strictly no need to go beyond the statement of significance, except in so far as the applicant needs to ensure that the description of significance is proportionate to the impact on that significance. However, the full staged approach is given here so as to help applicants putting together applications for consent.

33 The various sections of the suggested structure are described below, with recommendations as to content. This content will vary from one proposal/application to another, though certain sections, such as the Introduction, are likely to be needed in most, if not all, cases, and the description of the significance of the heritage asset is the central point of the statement. To show how the content of the assessment increases with significance and complexity, the headings for statements of heritage significance at three levels of proposed works – modest, more harmful and complex – follow.

1 Introduction

- **Purpose**
  What is the purpose of the Heritage Statement? A short note of the objective in preparing the statement, most often to support/explain an application for planning permission and/or listed building or other consent for certain works, is useful.

- **The Nature of the Proposal**
  Brief description of the proposal which forms the basis of the application. This might usefully set out a short outline of the proposed works, noting their scope and what they are expected to achieve – repair/alteration/extension – and whether they are internal or external.

  A brief note of the parts of the heritage asset which would not be affected by the proposals may be useful, where the proposals are more complex.

- **Designation records for the heritage asset** (bear in mind that list descriptions and HER entries are intended to identify the asset only, not to describe significance):

    - The address, number and date of listing, schedule entry or equivalent of the designated heritage asset from the National Heritage List for England as well as the description.

    - Similar information from the local list, if locally listed.

    - Related designations, where relevant, for instance a registered historic park and garden where development is proposed in the setting, impacting on the park and garden, or a related scheduled monument affected by the proposal.

    - Any non-designated heritage assets affected by the proposal – it is worth noting that the great majority of sites of archaeological interest are not nationally designated, though they may have equivalent significance to sites which are designated.

    - A note of the extent of the curtilage of listed buildings, if a curtilage building is affected by the proposal.

- **Reference(s) in the local Historic Environment Record**
  The site or building may be mentioned in the local Historic Environment Record. If the reference is relevant to the heritage asset, or is potentially affected, it should be mentioned here.

- **Archaeological Potential**
  Where separate archaeological desk-based assessment and/or archaeological field evaluation have been carried out, or where an archaeological field evaluation is proposed in the light of the desk-based assessment, reference should be made here.

- **Planning History**
  A brief overview of the planning history of the heritage asset is likely to be useful but this should be restricted to the context of the current application. Thus, in complex proposals, it may be longer but still be restricted to the previous history of related proposals; in the context, say, of a simple application for consent for a single interior feature, and where there is no related planning history, it will mention only the history of the current proposal.

  A brief résumé of the nature of related discussions with the LPA is likely to useful in setting the scene for the application.

  Where a heritage asset is locally listed it is useful briefly to note the local planning policy background for its protection.

- **Consultations undertaken**
  Consultations with expert bodies may have been undertaken. These may usefully be mentioned here, noting how responses received have informed the development of the proposal.

- **Approach and Methodology**
  Methodology – it will be useful to add a short section outlining how the statement has arrived at the assessment. This could note

  - How the assessment of significance has been carried out
  - Literature and documentary research review
  - How the contribution to significance of setting and views have been assessed, where applicable

2 The heritage asset and its significance

Understanding the form and history of a heritage asset

Set out an understanding of the heritage asset, including, for instance, the historical development of the heritage asset and an analysis of its surviving fabric. An analysis of the setting of the heritage asset is only needed where changes to the setting by the proposal would affect the significance of the heritage asset or how that significance is appreciated.

- Following familiarity with the asset itself developed through visiting the site, carry out, where necessary, documentary research, architectural history and archaeological investigation, including, where necessary, fabric and comparative analysis, desk-based assessment and, if necessary, a field evaluation.

- In more complex cases a phased account of the development of the heritage asset, with a gazetteer may be useful.

- Photographs, both new and historic, of the heritage asset, and drawings including elevations for buildings, and detailed photographs of the features concerned, are always likely to be helpful. Plans and elevations, including historic drawings, showing historical development may also be useful, perhaps more often in more complex cases, photographs being likely to suffice in simpler cases. Part-plans may be less helpful, as they will not show the context for works.

- An understanding of the proposal – the changes which the owner wishes to make – is important at this point to ensure that the information provided to the LPA in the statement of heritage significance is directed only towards those matters crucial in terms of the changes proposed, and therefore the impact on significance.

- In the development of proposals, investigative works may be carried out which increase the understanding of the heritage asset. Such further understanding may usefully be noted here.

Assess the significance of the heritage asset

- For each heritage asset, describe the various interests (see PPG - paragraph: 006 reference ID: 18a-006-20190723):

    - **Archaeological interest**
      There will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.

    - **Architectural and artistic interest**
      These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skills, like sculpture.

    - **Historic Interest**
      An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.

- Having described the various interests, assess the level of the general significance of the heritage asset and the particular contribution to that significance of any features which would be affected by the proposal, or of its setting if it, too, is affected by the proposal.

- Again in the development of proposals and during works, more information may become available which increases the understanding of the heritage asset, and of its significance. The opportunity may usefully be taken to re-appraise significance in such cases.

The applicant can assist the LPA's decision-making by setting out a clear and succinct explanation of the impact of the proposal on significance and how negative impact on significance has been avoided, by continuing to follow the staged approach, as shown below.

3 Impact on the significance

- Where the proposal affects the historic fabric of the heritage asset, specify the effect on that fabric including loss or concealment of historic features and fabric which contribute to significance, both inside and out, proposed removals and demolitions and the impact of alterations and extensions, where proposed, etc.

- In some cases, condition and structural surveys may usefully be quoted, to explain why a particular course has been chosen.

- Where the proposal affects the setting, and related views, of a heritage asset, or assets, clarify the contribution of the setting to the significance of the asset, or the way that the setting allows the significance to be appreciated. This may include the impact of the location of new development within the setting, of the impact on key views, the impact on the relationship of the heritage asset to its setting, etc.

- Where the proposal impacts both on the heritage asset directly and on its setting, a cumulative assessment of impact will be needed. Impacts both harmful and beneficial should be noted.

4 Avoid harmful impact(s)

- The NPPF stresses that impacts on heritage assets should be avoided. Therefore, show how the impact is to be avoided or minimised, for instance by the proposal being reversible.

- In some circumstances, the ability to appreciate significance may be enhanced or otherwise revealed by the proposal; this should be outlined here.

- As this may be a matter of the way the proposal has been designed, reference in the Design and Access Statement (where appropriate) is likely to be useful.

5 Justification for harmful impacts

- This is the opportunity to describe the justification for the proposal.

6 Recording

- Where there would be an impact on the significance of the heritage asset, detail any further archaeological analysis and recording proposed.

34 As the level of detail in a statement of heritage significance should be proportionate to the asset's importance and no more than is sufficient to understand the potential impact of the proposal on their significance (see paragraph 5), such statements will differ in length and treatment. The approach should therefore be proportionate according to circumstances. The following examples indicate how the material in a statement of heritage significance differs depending upon the significance of the asset and the scope of the proposal:

- **Modest proposal to a heritage asset of lower significance: statement might cover**
  Introduction - purpose, scope of the proposal, designation records for the heritage asset, references in the Historic Environment Record, planning history

  Description of the asset and its significance - understanding of the history and form of the heritage asset, assessment of its significance

- **More harmful proposal to a heritage asset of greater significance**
  Introduction – purpose, scope of the proposal, designation records for the heritage asset , reference(s) in the local Historic Environment Record, archaeological potential (if relevant), planning history (if relevant), approach and methodology, consultations undertaken

  Description of the form and history of the heritage asset

  - analysis of its surviving fabric, particularly that affected by the proposal and an analysis of the setting of the heritage asset, if relevant
  - details of documentary research, map regression, architectural history and archaeological investigation (note whether field evaluation suggested)
  - photographs and plans, both historic and contemporary, where necessary

  Description of significance

  - description of the various interests: archaeological, architectural and artistic, and historic interest
  - assessment of the level of the general significance of the heritage asset and the particular contribution to the significance of any features and/or of its setting, affected by the proposal
  - concise explanation of the effect of the proposal on significance of the heritage asset and how harm to significance has been avoided, as a summary

- **Complex and harmful proposal to a heritage asset or assets of high significance**

  Introduction – purpose, scope of the proposal including note of parts of asset not affected, designation records for the heritage asset, reference(s) in the local Historic Environment Record, archaeological potential, planning history, approach and methodology, consultations undertaken

  Description of the form and history of the heritage asset and its significance

  - full analysis of historical development with analysis of surviving fabric and full analysis of the setting of the heritage asset, where significance or ability to appreciate significance affected
  - details of documentary research, map regression, architectural history and/or archaeological investigation – desk-based assessment and/or field evaluation
  - production of phased account of the development of the site with a gazetteer
  - photographs and plans, both historic and contemporary, showing evolution of heritage asset, where necessary
  - note of any further investigative works necessary to further the understanding/analysis of significance of the heritage asset

  Description of significance

  - full description of the various interests: archaeological, architectural and artistic, and historic interest
  - full assessment of the level of the general significance of the heritage asset and the particular contribution to the significance of any features and/or of its setting, affected by the proposal
  - concise explanation of the effect of the proposal on significance of the heritage asset and how harm to significance has been avoided, as a summary

  Succinct explanation of the impact of the proposal on significance of heritage asset(s)and how impact on significance, both positive and negative, has been avoided, by continuing to follow the staged approach - impact on the significance, avoid harmful impact(s), justification for harmful impacts, need for recording

  A clear and succinct explanation of the effect of the proposal on significance of the heritage asset, and how any harm to its significance has been avoided, can be helpful, as a summary of the proposal

Contact Historic England

East of England
Brooklands
24 Brooklands Avenue
Cambridge CB2 8BU
Tel: 01223 582749
Email: eastofengland@HistoricEngland.org.uk

Fort Cumberland
Fort Cumberland Road
Eastney
Portsmouth PO4 9LD
Tel: 023 9285 6704
Email: fort.cumberland@HistoricEngland.org.uk

London and South East
4th Floor
Cannon Bridge House
25 Dowgate Hill
London EC4R 2YA
Tel: 020 7973 3700
Email: londonseast@HistoricEngland.org.uk

Midlands
The Axis
10 Holliday Street
Birmingham B1 1TG
Tel: 0121 625 6888
Email: midlands@HistoricEngland.org.uk

North East and Yorkshire
Bessie Surtees House
41-44 Sandhill
Newcastle Upon Tyne NE1 3JF
Tel: 0191 269 1255
Email: northeast@HistoricEngland.org.uk

37 Tanner Row
York YO1 6WP
Tel: 01904 601948
Email: yorkshire@HistoricEngland.org.uk

North West
3rd Floor,
Canada House
3 Chepstow Street
Manchester M1 5FW
Tel: 0161 242 1416
Email: northwest@HistoricEngland.org.uk

South West
29 Queen Square
Bristol BS1 4ND
Tel: 0117 975 1308
Email: southwest@HistoricEngland.org.uk

Swindon
The Engine House
Fire Fly Avenue
Swindon SN2 2EH
Tel: 01793 445050
Email: swindon@HistoricEngland.org.uk

Historic England

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