

GUIDANCE ON PREPARING
HERITAGE STATEMENTS
for
LISTED BUILDING CONSENT
APPLICATIONS

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Introduction

This guidance has been prepared by the Essex Conservation Officers' Forum for use in the county.

The requirement for a statement which supports the case for a listed building consent is not a new concept. Planning Policy Guidance 15 (1994), which provided guidance on listed buildings and conservation areas under the terms of the 1990 Planning Act, said that local planning authorities 'should expect developers to assess the likely impact of their proposals on the special interest of the site or structure in question, and to provide such written information or drawings as may be required to understand the significance of a site or structure before an application is determined'.

Today the National Planning Policy Framework (2012) says that local planning authorities should require applicants to describe the significance of heritage assets or listed buildings affected by the proposed works, such that it is possible to understand the impact they may have on that significance (para. 128). Local authorities are required to consider the

impact of the application on the significance of the building when determining the application (para. 129). In conformity with the NPPF, applications for listed building consent should be supported by a Heritage Statement, which identifies the significance of the building and the impact of the works upon it. All Essex local planning authorities include a Heritage Statement amongst their validation requirements for listed building consent. Such applications should be accompanied by a Design and Access Statement setting out the thinking on the design process behind the scheme. Current guidance recommends that the Heritage Statement be included in the Design and Access Statement.

Comprehensive current guidance on applications relating to listed buildings and indeed all heritage assets can be found in English Heritage's 2015 advice note *Managing Significance in Decision-Taking in the Historic Environment* (<https://content.historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/gpa2.pdf/>).

The Format of a Heritage Statement

The information submitted should be proportionate to the works proposed. It is not expected in most cases to be a piece of original research or a full building record. For applications with a minor impact on the listed building, two or three pages should be sufficient.

- The following template is suggested for the contents of a Heritage Statement:
- Background to the application, what it's about etc.

- The list description
- A brief history of the building in so far as it is known, including planning history
- Key elements of the building which contribute to its significance
- The statement of significance
- List of key elements affected by the application, ideally identified visually through plans and photographs etc.
- Assessment of impact on significance and measures taken to mitigate this

Sources of Information

Current guidance says that at a minimum, the Historic Environment Record (HER) should have been consulted. The Essex HER can be accessed on-line through the Heritage Gateway or Unlocking Essex's Past, or consulted at County Hall. In many cases it will not contain much more than the list description. Map regression (i.e. comparing a sequence of old maps) is usually necessary and will generally require a visit to the Essex Record Office, though some of this material can be found online. Other possible sources of information are the Essex Pevsner (i.e. the latest volume in the Buildings of England series published by Yale University

Press), books on local history, and the Royal Commission on Historical Monuments (RCHM) and Victoria County History volumes for the county, now available on line. The original RCHM survey notes and photographs are in the Commission's archive at Swindon, copies of which can be provided for a small fee on request (archive@HistoricEngland.org.uk). More detailed Heritage Statements will require consulting the Essex Record Office. The Record Office's SEAX catalogue is online (<http://seax.essexcc.gov.uk>) and can be searched to see if there is likely to be useful material amongst its holdings.

The Statement of Significance

Buildings are listed according to the following selection criteria:

- Architectural interest
- Age, rarity. All before 1700, most 1700-1840. Key exemplars of 20th century buildings over 30 years old
- Historic interest
- Close historical associations

These are all factors which are likely to contribute to the building's significance. The NPPF says that 'in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest'. A simple approach to assessing the significance of a building is to identify its key elements and their relative importance. These are likely to comprise the following:

- The general appearance of the building, and the impression it makes on the casual observer
- Its architectural character and style
- Its landscape or townscape setting

- Its layout or plan
- Special features such as staircases, fireplaces, doors and windows
- Surface finishes and materials, such as bricks, roof coverings, plaster and floorboards
- Links to well-known people or events

The simplest way of explaining this information is the use of plans illustrating the suggested age of different parts of the building, and indicating the survival and extent of special features and such things as old plaster.

Significance can also be assessed by reference to the values (historical, aesthetic, communal and evidential) identified in English Heritage's publication *Conservation Principles* (<https://content.historicengland.org.uk/images-books/publications/conservation-principles-sustainable-management-historic-environment/conservationprinciplespolicyguidanceapr08web.pdf/>). The survival of historic fabric is a major contributing factor to the importance of a building, and is often used as a measure of significance.

The Impact Assessment

The heritage statement should explain how the proposed works might affect the significance of the building. Extensions can alter the historic character of a building dramatically, and also affect historic fabric. Loss of historic legibility, whether of the external appearance of the building or its plan form, is always damaging. Changes to materials such as roof tiles or render, and to windows, could have an aesthetic impact with the potential to alter the appearance of a building. Repairs to timber frames or brickwork could have a similar impact, particularly repointing brickwork, but also lead to a loss of historic interest. Ancillary buildings and landscaping will affect setting. The

heritage statement should show that these considerations have been taken into account and the impact of the works mitigated accordingly.

Impact assessments can be laid out in table or matrix form, listing the sensitivity or significance of parts of the heritage asset, and the effect of change upon them, using standard terms of reference such as high, moderate and low. These risk becoming formulaic and disaggregating the features of the heritage asset so that the whole picture becomes obscured. This approach should therefore be used with caution, although it can be useful for some cases.

Building Recording

Building recording is not the same as a heritage statement, being much more detailed. It is typically required where works have a major impact on the listed building, where fabric will be lost (thus ensuring preservation by record) or opened up revealing new information

about it. It will generally be required where a building such as a barn or industrial building is being converted to a new use, establishing a baseline for our knowledge about it. Ideally it should accompany and inform the application, and not be prepared afterwards.

References

- Bettley, J. and Pevsner, N. 2007 *The Buildings of England*, Yale University Press
- English Heritage 2008 *Conservation Principles, Policies and Guidance*, <https://content.historicengland.org.uk/images-books/publications/conservation-principles-sustainable-management-historic-environment/conservationprinciplespoliciesguidanceapr08web.pdf/>
- Essex Historic Environment Record, http://unlockingessex.essexcc.gov.uk/uep/custom_pages/home_page.asp
- Essex Record Office, <http://seax.essexcc.gov.uk/>
- Royal Commission on Historical Monuments, Essex (4 vols), <http://www.british-history.ac.uk/search/series/rchme>
- The Victoria History of the Counties of England, <http://www.british-history.ac.uk/search/series/vch--essex>