



GUIDANCE ON HERITAGE STATEMENTS JUNE 2019

Borough Council of
King's Lynn &
West Norfolk



Borough Council of King's Lynn and West Norfolk
Guidance on Heritage Statements

June 2019

INTRODUCTION

The National Planning Policy Framework (NPPF) 2018 states that Local Planning Authorities should require applicants 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.” (Para. 189)

Paragraph 190 of the NPPF also requires the Local Planning Authority to consider the impact of any application on the significance of the affected heritage assets when determining the application.

When is a Heritage Statement required?

A Heritage Statement will be required for the following application types:

- Listed Building Consent;
- Applications within the curtilage of a listed building (an area of land surrounding a property, including any closely associated buildings and structures)
- Applications for sites within a conservation area;
- Applications affecting Scheduled Monuments;
- Applications affecting a Registered Park & Garden;
- Applications affecting non-designated heritage assets (buildings of local interest);
- Applications affecting the setting of a heritage asset (i.e. adjacent to a conservation area or listed building)

The preparation of a Heritage Statement should not be an afterthought; it should form an integral part of the design process and where a Design and Access Statement is also required then it can form part of this document.

Where a Heritage Statement is required and it is not received, your application will be made invalid until this information is received.

Comprehensive guidance on applications affecting heritage assets can be found in Historic England’s 2015 advice note Managing Significance in decision-taking in the Historic Environment (<http://www.historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking>)

Who can produce a Heritage Statement?

To produce a Heritage Statement, the level of detail required should be proportionate to the scale and nature of the proposal, as well as the significance of the asset.

It may therefore be possible for the applicant to produce an adequate heritage statement for relatively minor proposals. However, for more complex schemes, the statement should be produced by a suitably qualified professional to ensure it contains the correct amount of detail.

FORMAT OF A HERITAGE STATEMENT

In line with the requirements of the NPPF, the amount of information submitted should be proportionate to the works proposed. It is not generally expected that a Heritage Statement will be a full building record or piece of original research on a building or area.

As a minimum, the NPPF requires the relevant Historic Environment Record to be consulted and this should be included as an appendix to your heritage statement. It should not form the content of the statement itself.

What should a Heritage Statement include?

The scope and complexity of a Heritage Statement will vary depending on the extent of the proposals and the importance of the heritage asset affected. As a general rule the following information should be included in a heritage statement:

- 1 A description of the heritage asset and its setting**
- 2 Statement of significance**
- 3 An explanation of the design concept**
- 4 Assessment of impact and any measures taken to mitigate this.**

More detailed guidance on each of these sections is given overleaf.

The Heritage Statement should clearly show that you have considered all of the relevant issues and that you have sought to preserve the special character and appearance of the building or area affected.

The Council has produced a template that can be used to help produce a basic Heritage Statement. This is available as a separate document that can be printed or downloaded from the Council's website.

BUILDING RECORDING

The Recording of a building may also be required as part of the Listed Building Application or Planning Permission. This should be carried out separate to a Heritage Statement in order to help inform the contents.

Further details on building recording are available on page 8.

1 **A DESCRIPTION OF THE HERITAGE ASSET AND ITS SETTING:**

- The list description (if relevant)
- A brief history of the building or area in so far as it is known, including any planning history;
 - Is the asset located within a conservation area?
 - What is the age of the building?
 - What are the main characteristics (style, materials & architectural features)?
 - What is the surrounding area like?
 - Describe the immediate context – is it residential/commercial? Is there a variety of building form and type? Is it suburban/rural/etc

2 **STATEMENT OF SIGNIFICANCE:**

- How does the building/site contribute to the character of the area?
 - Is it one of a kind? Part of a group, terrace, etc?
 - If the building is curtilage listed, this should include the merits of the building and its relationship with the primary listed building.
- How does the setting contribute to the character and appearance of the asset
- Key elements of the building or area which contribute to its significance;

Significance can be assessed by reference to the historical, aesthetic, communal and evidential values as identified in Historic England's Conservation Principles (<https://historicengland.org.uk/images-books/publications/conservation-principles-sustainable-management-historic-environment>)

Evidential Value

This derives from the potential of a place to yield evidence of past human activity. This is where looking to the Historic Environment Record may shed light on known archaeological remains and consideration should be given to the potential for the discovery of unknown archaeological remains.

Historical Value

This derives from the potential for a place to visibly illustrate the past or a notable person/event through association. The association of a place with specific people or events where the 'users' feel connected to the past in some way.

Aesthetic Value

This derives from the ways in which people are stimulated by a place either in a sensory or intellectual capacity either through design or the organic evolution of a place. This type of value generally evokes an emotional response from the 'users'.

Communal Value

This derives from the meaning of a place for the people who relate to it, either through their collective experience or memory. This value is most commonly associated with places that draw people together such as memorials.

Conservation Areas

Conservation areas are designated as a result of their architectural or historic interest and when considering the impact of applications that may affect that interest and significance it is important to look at both the cultural and natural heritage values attached to the area.

Conservation Areas often contain a number of listed buildings as well as numerous other buildings and structures that all contribute significantly to their character. They are also likely to contain significant archaeological remains, in particular within some of the larger towns and villages.

The following key issues may help inform any assessment of significance of the Borough's conservation areas:

- Have there been any unsympathetic alterations? Has the area lost or retained much of its special interest?
- If there is a large retail presence, does the shop front design and signage make a significant contribution to the special interest?
- Infill development can support or undermine the special interest of an area, is there evidence of either?
- Look at boundary treatments, front gardens, etc which can contribute or detract from the special interest of an area;
- Look at the public realm – do the signs, pavements, surfaces, lighting, etc have a positive or negative impact on the character or perception of an area?

Listed Buildings

Buildings are listed according to the following criteria:

- Their architectural interest;
- Their age & rarity – generally all buildings that pre-date 1700 will be listed; most 1700-1840 and key exemplar buildings over 30yrs old;
- Their historic interest;
- Any close historical associations.

All of these factors are likely to contribute to the significance of any particular building or group of buildings. Paragraph 193 of the NPPF recognises the irreplaceable nature of heritage assets and that any harm or loss should require clear and convincing justification.

The National Planning Policy Guidance outlines the importance of 'significance' in the decision making process: "Heritage assets may be affected by direct physical change or by change in their setting". Determining whether a proposal is likely to cause harm to the significance of a heritage asset will require a balanced judgement to be made by the Local Planning Authority taking into account the individual circumstances of the case alongside both local and national planning policy.

A very simplistic approach that can be taken to assessing the significance of a building would be to identify its key elements such as:

- The general appearance of the building;
- The architectural character and style of the building;
- The layout or plan form of the building;
- Any special features such as stairs, fireplaces, doors, windows;
- Details of surfaces and finishes;
- Links to well-known people or events

The easiest way to illustrate this is through the use of plans, sketches and photographs. The use of plans which show the development of the building can be very useful in identifying important surviving historic fabric.

The survival of historic fabric within buildings is a major contributing factor to the importance of a building, and is often used a measure of significance.

Where a proposal affects a Grade I or II* listed building it is advisable to contact Historic England for pre-application advice. This will assist in identifying the level of detail that may be required in the statement. There may be a fee involved with obtaining this information.

Monuments and Archaeological Remains

Under the Ancient Monuments and Archaeological Areas Act 1979, the Secretary of State can designate any building, structure or other work above or below ground, in territorial waters, which appears to be of national importance.

Once a monument is scheduled, development that would affect it requires the consent of the Secretary of State. In this context the word 'affect' means any works that would have the impact of demolishing, destroying, damaging, removing, repairing, altering, adding to, flooding or covering up the monument, and includes the use of geophysical remote sensing devices, including metal detectors.

Ancient Monument Consent is dealt with by Historic England.

The term archaeology refers not only to remains under the ground, but also to standing remains such as historic buildings and structures. For this type of asset, this section should look at the following:

- Evolution of the monument;
- Phases of development over different periods;
- Important features;
- Evidence in building fabric;
- Potential for below ground remains.

When considering proposals that are likely to affect a monument or archaeological remains, it is recommended that applicants contact the Historic Environment Team at Norfolk County Council for further advice on information@norfolk.gov.uk 0344 800 8020

3 DESIGN CONCEPT

- What is the design and proposed materials?
- The amount of development, scale, landscaping, architectural details?
- Is it reinstatement of earlier structures or details now lost?

This section should clearly set out, ideally in the form of a schedule with references to any relevant plans or drawings, the overall design concept for the proposal.

The statement should show clearly that you have considered all the relevant issues and sought to preserve the special appearance and character of the building or area affected. Information on any sources and expertise that has been consulted should also be provided.

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.

Where proposals involve demolition, significant reconstruction or repair works then it is also likely that a structural survey will be required alongside your application. When required these should be produced by a structural engineer that is familiar in dealing with Historic Buildings and include:

- Details of the structural stability and condition of the heritage asset, including any defects;
- A detailed schedule/method statement of any proposed repairs;
- A statement explaining how the stability of the asset and any adjoining structures will be protected during the works;
- Details of how any internal or external decorative features, finishes or joinery will be protected, if appropriate;
- The method of demolition.

4 ASSESSMENT OF IMPACT (INCLUDING JUSTIFICATION)

- Key elements affected by the application and a description of the impact (These can be identified visually through the use of plans and photographs):
 - Will the proposal be visible from public viewpoints?
 - Will the development involve loss or change to original features?
 - What would the impact on the appearance, character and setting be?
 - Would it preserve or enhance the character and appearance of the building and/or street scene?

A good Heritage Statement should explain how the proposed works may impact the significance of any heritage assets that may be affected by them. The statement should clearly demonstrate that these considerations have been taken into account and the impact of these works has been appropriately mitigated for.

This should include the likely impact of the proposed works on the significance of the heritage asset and/or its setting, an assessment of the scale and nature of any harm that would be caused to the significance of the heritage asset, and the details of any potential heritage benefits, including proposals which enhance or better reveal the significance.

A statement of justification is also required, explaining why the works are desirable or necessary, including any benefits which justify any resulting harm. In the case of substantial harm or loss of significance, the tests in the NPPF should be applied (paragraph 195).

Questions to think about whilst writing this section may include:

- Does the statement sufficiently explain why the proposals are necessary or desirable?
- Does the proposal affect any views looking away from or towards the asset?
- If any historic fabric is to be removed or altered, is its significance properly understood and explained in the document?
- Are the design details of any proposed new work clearly described in the statement?
- Have a variety of options been considered and why was the submitted option chosen?
- Are the works reversible at all?
- If the proposed works will result in any harm, is the harm offset or outweighed by any public benefits? (see glossary for definition of public benefits)

Please note that 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.

Mitigation

It may be necessary in some instances to produce a mitigation strategy as part of this section.

A mitigation strategy should clearly show what steps have been taken to avoid, minimise or mitigate any harm to the significance of the heritage asset. This will help to explain your design approach and how your understanding of the asset's significance has informed this. Information that may be included in this section can be as follows:

- Are the works the minimum required?
- Are they reversible?

- Has it been designed sensitively, e.g. has a less sensitive part of the building/site be used to accommodate the proposed use?
- Will the extension be subservient to the main building, and not detract from it?
- Have appropriate materials been selected for new and repair works, which avoid visual or structural harm to the building?
- Has a programme been considered for investigation and recording of architectural or archaeological features which might be uncovered as part of a conversion, or for works which might unavoidably obscure them?

BUILDING RECORDING

Recording should be carried out separate to a Heritage Statement in order to help inform the contents or satisfy a specific condition.

Building recording may also be required where works are likely to have a major impact on a listed building, particularly where historic fabric will be lost and is most commonly required where buildings are undergoing extensive changes, such as a barn being converted to residential use or when proposing extensive repair works.

Historic England guidance document: Understanding Historic Buildings – A guide to Good Recording Practice (see useful documents) provides information on levels of recording and the kind of information that may be required.

Generally there are 4 levels of building recording that may be deemed appropriate. These may be required prior to the submission of an application or they may be requested as a condition of permission being granted.

Level 1: This is a basic visual record of the building, normally used to gather basic information about a building or group of buildings.

Level 2: This is a descriptive record when more information is required. Generally the interior and exterior of the building will be described and photographed and an analysis of the development and use of the building produced.
--

Level 3: This is an analytical record and will include a detailed account of the buildings origin, development and use. It will include an analysis of the evidence on which this is based as well as a detailed drawn and photographic record of the building to support the historic analysis.
--

Level 4: This should form a comprehensive analytical record and will draw on any and all sources of information on the building. It will also discuss its significance in terms of architectural, social, regional or economic history.

SOURCES OF INFORMATION

The NPPF expects that as a minimum requirement, the Historic Environment Record should have been consulted. The Norfolk Historic Environment Record can be accessed on-line through the Heritage Gateway website:
www.heritagegateway.org.uk

The National Heritage List for England provides details of listed buildings, scheduled monuments, historic parks and gardens within the District:
<https://historicengland.org.uk/listing>

Conservation Area appraisals and maps where available can be found on the Council's website. The appraisal documents identify significant aspects that contribute to the historic or architectural significance of the area. These can be viewed or downloaded from:
https://www.west-norfolk.gov.uk/info/20081/conservation_and_listed_buildings/conservation_areas

Useful Contacts

Borough Council Of King's Lynn and West Norfolk Conservation Team
01553 616200
borough.planning@west-norfolk.gov.uk

Norfolk Historic Environment Team
0344 800 8020
information@norfolk.gov.uk

Norfolk Historic Environment Record
01362 860528

Historic England (East of England Office)
01223 582749
eastofengland@historicengland.org.uk

Useful Websites

The National Heritage List for England
<http://www.lhistoricengland.org.uk/list>

The Heritage Gateway
<http://www.heritagegateway.org.uk/gateway/>

Images of England
<http://www.imagesofengland.org.uk/>

National Planning Policy Framework (NPPF)
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

NPPF Planning Practice Guidance
<http://www.planningguidance.planningportal.gov.uk/>

Old Maps
<http://www.old-maps.co.uk>

MAGIC
<http://www.magic.defra.gov.uk>

Norfolk Historic Maps
<http://www.historic-maps.norfolk.gov.uk>

Norfolk Heritage Explorer
<http://www.heritage.norfolk.gov.uk>

Other sources of information are also available such as the Norfolk Pevsner (Buildings of England), local history books, the Royal Commission on Historic Monuments (RCHM). Copies of the original RCHM surveys and photographs are available for a small fee from request at archive@HistoricEngland.org.uk

British History Online is a digital library of key printed primary and secondary sources for the history of Britain and Ireland, with a primary focus on the period between 1300 and 1800. The Victoria County Histories are particularly useful:
<http://www.british-history.ac.uk>

If old photographs, drawings or plans are available, it may be useful to reproduce these within your statement.

For higher status buildings, architects drawings might survive and these can be useful to illustrate incremental changes to a building. Local historians and history groups may also be willing to help, particularly on complicated schemes.

USEFUL DOCUMENTS

Historic England

Historic England produces a range of advice and guidance notes. These are available from: <https://historicengland.org.uk/advice> and include:

Making Changes to Heritage Assets: Historic England Advice Note 2. This document sets out general advice on the different levels of intervention, whether it be repair, restoration, addition and alteration.

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

Conservation Principles, Policy and Guidance for the Sustainable Management of the Historic Environment. (Historic England, 2008). This document sets out a method for thinking systematically and consistently about the heritage values that can be ascribed to a place.

Energy Efficiency and Historic Buildings: Historic England has produced a wide range of practical guidance to help with saving energy in older and listed buildings.

Easy Access to Historic Buildings: Historic England's guidance on physical access issues, looking at both the challenges and opportunities.

Other Useful Societies and Organisations

National Amenity Societies such as the Society for the Protection of Ancient Buildings (SPAB), the Ancient Monuments Society, The Georgian Group, The Victorian Society and The Twentieth Century Society publish extensive material on their websites and in books and journals.

GLOSSARY

Designated Heritage Asset

A world heritage site, scheduled monument, listed building, protected wreck site, registered park or garden, registered battlefield, conservation area or building of local interest

Non-designated Heritage Asset

These are buildings, monuments, sites, places or landscapes identified by the Local Planning Authority as having a degree of significance in heritage terms. These are normally identified by the Local Planning Authority during pre-application discussions, during the decision making process or plan making process.

Setting

This is the surroundings in which a heritage asset is experienced. The extent of its setting is not something that is fixed and may change over time. Elements of setting may make a positive or negative contribution to the significance of the asset.

Significance

This is the value of a heritage asset to this and future generations as a result of its heritage interest. That interest can be archaeological, architectural, historic or artistic in nature

Public Benefit

In order for a benefit to be considered public, any benefits should flow directly from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit. Public benefits may include heritage benefits, such as:

- Sustaining or enhancing the significance of a heritage asset and the contribution of its setting;
- Reducing or removing risks to a heritage asset;
- Securing the optimum viable use of a heritage asset in support of its long term conservation.