

Heritage Statements *for the* South Downs National Park Authority:

A Guide for Applicants



The National Planning Policy Framework (NPPF) is the government's advice to local planning authorities on how to manage the planning process. Paragraph 128 of the NPPF states 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.

Heritage Statements (HS) are the document which meet this requirement.

When referring to 'Heritage Assets', the NPPF means designated assets such as Listed Buildings, Conservation Areas, Historic Parks and Gardens, Scheduled Monuments, Historic Battlefields, and Historic marine wrecks, which are identified in the web-based National Heritage List for England (NHLE). The NHLE can be searched at:

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

It also means Heritage Assets which are not on the National List but which are of local importance, often called 'undesigned Heritage Assets'.

When are Heritage Statements Required?

The National Park Authority requires the submission of a HS for all applications for development affecting a heritage asset and/or its setting. This means:

- Applications for Listed Building Consent
- Applications within the curtilage of a listed building
- Applications in Conservation Area
- Applications affecting Scheduled Monument
- Application affecting a Registered Park or Garden.
- Applications affecting an archaeological site
- Applications affecting undesigned Heritage assets
- Applications affecting the "setting" of any Heritage Assets. "Setting" may be defined as 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.

Applications submitted without a HS will be made invalid and the consideration of the application delayed, so it is in everyone's interest for an adequate HS to be submitted from the start.

Can I write a Heritage Statement myself?

We need a HS to be accurate and appropriate, but we will take a proportionate approach to what we expect depending on the scale and nature of the proposal and the heritage asset.

Where a development is small and impacts likely to be limited, a short Heritage Statement written by the applicant or agent may be adequate. This guidance is designed for use in such cases, rather than Historic Environment professionals. A template in the form of a series of headings which should guide you can be found later on in this document.

In other cases though, the scale of the proposed development or the nature and importance of known Heritage Assets may require the HS to be prepared by a suitably qualified person who has the "appropriate expertise" referred to in the NPPF. Whilst this will involve expense, the investment will be rewarded in the long run with a better and speedier planning decision.

Writing a Heritage Statement

We started with the requirement set out in the NPPF and the key words in paragraph 128 of the NPPF are significance and impact. The HS should:

- set out the significance of the Heritage Asset affected;
- describe the proposed changes; and
- provide a justification for any 'harm' which arises from them and set out a mitigation strategy

WRITING A HERITAGE STATEMENT FOR A HISTORIC BUILDING, INCLUDING BUILDINGS IN CONSERVATION AREAS

This section provides a series of headings which should be used to structure your Heritage Statement (HS). For each heading, some guidance notes have been provided to help understand what is required.

It is largely intended for use by applicants and their agents, rather than Historic Environment professionals, and focusses on applications relating to listed buildings and conservation areas, which make up the bulk of those requiring a Heritage Statement.

However, the general principles, if not all of the more detailed guidance, are applicable to Heritage Assets of all kinds.

Heading 1: Assessment of Heritage Significance

The first part of the HS should help us to better understand the Heritage Asset.

- The starting point for this should be the relevant Historic Environment Record (HER) in all cases. The National Park is covered by five different HERs. More information about which HER to consult and how to do so is included later in this document. The information supplied by the HER is not a HS in its own right but is an essential component and should be attached to it
- For designated heritage assets, the web-based National Heritage List for England

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

can provide some basic information including list descriptions, scheduled monument descriptions, entries in the registers of historic parks and gardens and battlefields, which should be included in the HS.

- Illustrate the building with photographs of the elevations and close-ups of particularly interesting features, plans and elevations (photographs alone may be acceptable for simpler cases).
- If the building has evolved over time, explain this with plans in which the different phases are shown in different colours. Explain what the evidence is for this phasing. Whilst the whole building is listed, some parts may be particularly important and sensitive to change whilst others are less so. For complex buildings, this exercise will almost certainly require the services of a professional buildings historian/archaeologist.
- Some buildings may not have been extended but might have seen other changes. A Victorian house, for example, may remain largely in its original form but have lost its original sash windows. This can be illustrated using photographs.

- Remember that this exercise should be applied to the inside as well as the outside, particularly if the proposed changes affect the interior. Original period features - fireplaces, decorative mouldings, period door and windows furniture etc - will contribute to the historic interest of the building. A room-by-room schedule, illustrated with photographs, recording the floors, walls, ceilings, fireplaces, mouldings etc is the best way to capture this information.

- Don't forget that buildings are themselves artefacts surviving from the past and, therefore, part of the archaeological heritage. They may also stand over sub-surface archaeology associated with earlier phases of the building or something completely different which preceded the construction of the building. The HER will advise you if your building has this potential.

In putting together this analysis, there are a number of sources of information in addition to the HER and NHLE, including:

- County Records Office - historic plans, building survey reports
- Published local histories, particularly those which include old photographs
- The web site “ England's Places” gives access to a library of old photographs

<https://historicengland.org.uk/images-books/archive/archive-collections/englands-places/>

- Conservation Area Appraisals
- Extensive Urban Surveys
- Historic Landscape Characterisation

Heading 2: Assessment of Impact

Having developed an understanding of the historic interest and evolution of the building, the second stage is to consider what impact the proposals will have on the historic interest and significance of the building. This section should include:

- A Schedule of the proposed works
- All necessary large scale plans, elevations, sections, context drawings and perspectives to allow us to fully understand the proposal and its impact on the building. These will normally form part of the overall application and need not be separately incorporated into the Heritage Statement
- A statement of impact assessing:
 - i. The likely impact of the proposed works on the significance of the buildings and/or its setting.
 - ii. The scale and nature of any harm that would be caused to the significance of the building.
 - iii. Any potential heritage benefits, including proposals which enhance or better reveal the significance of the buildings.

Heading 3: Justification and Mitigation

In determining an application which results in harm to a Heritage Asset, the National Park Authority has to balance that harm against any wider public benefits that arise from the proposal.

The third part of the Heritage Statement is the part where you explain why you believe the changes proposed are desirable or necessary, including reference to any benefits that might arise, and offer a justification for the National Park Authority to approve the application.

It is also the place to explain what mitigation strategies have been adopted or considered. Such strategies might include:

- **Minimal intervention and reversible works:** are all the works absolutely required for the proposed use or function? Can new work be designed so that it can easily be installed and removed at some later date without causing damage to significant building fabric?
- **Alternative methods of development:** examining whether other options exist to meet the applicant's objectives. Could a less sensitive part of the building be used to accommodate a proposed use or function? Could a new building or extension be repositioned so it is less detrimental to the setting of an archaeological feature or historic building?
- **Sensitive design:** examples include the installation of new services in a discreet manner so as not to compromise the qualities of a room, or skilfully designing an extension that takes account of the physical massing and scale in both the old and the new work.
- **Choice of materials:** the careful selection of construction materials for new and repair works can avoid both visual and longer-term structural harm to a building.
- **Recording:** a programme for investigation and recording of architectural features that would be obscured, damaged or destroyed.

CONSULTING THE HISTORIC ENVIRONMENT RECORD (HER)

There are five different HERs covering the National Park and you should consult the one that covers your site:

- East Sussex County HER (all of East Sussex)
- West Sussex County HER (all of West Sussex except Chichester District)
- Chichester District HER (all of Chichester District)
- Hampshire County HER (all of Hampshire except Winchester District)
- Winchester District Council (all of Winchester District)

East Sussex HER can provide a HER Consultation Report to be used as part of a HS. Follow this link:

<https://eastsussex.gov.uk/environment/archaeology/consultationreport>

West Sussex HER can provide a HER search which can be incorporated in a HS. Follow this link:

https://www.westsussex.gov.uk/land-waste-and-housing/landscape-and-environment/historic-environment-record/#request-a-historic-environment-record-search_tab

Chichester HER can provide a HER search which can be incorporated in a HS. Follow this link:

<http://www.chichester.gov.uk/article/25592/Historic-Environment-Record-HER>

Hampshire County HER can provide a HER search which can be incorporated in a HS. Follow this link:

<http://www3.hants.gov.uk/landscape-and-heritage/historic-environment/historic-buildings-register.htm>

Winchester District HER can provide a HER search which can be incorporated in a HS, Follow this link:

http://www.winchester.gov.uk/forms/ShowForm.asp?fm_fid=216

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