



Guidance on preparing a Heritage Statement

What is a Heritage Statement?

The National Park is rich in history and important cultural heritage. Heritage Statements assess the significance of a site and the impact of a proposal upon it to inform decisions on its future. The benefits of producing a Heritage Statement are that it can help to formulate better proposals, delivers a quicker planning decision and can often save the applicant money.

In 2012 the National Planning Policy Framework (NPPF) was introduced. This provides the guidance for planning policy nationally on everything from flooding to transportation and of course the historic environment.

<https://www.gov.uk/government/publications/national-planning-policy-framework--2>

Section 12 of the NPPF (Conserving and Enhancing the Historic Environment) contains 16 paragraphs against which all Local Authorities must form their policies as well as the following key definitions:

Heritage Statement: An assessment of the significance of heritage assets and/or their settings affected by a development, and of the impacts of that development upon them

Heritage Asset: A “building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest.” The term “heritage asset” includes designated heritage assets and non-designated assets identified by the local planning authority (including local listing).

Significance (for heritage policy): 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. Significance derives not only from a heritage asset’s physical presence, but also from its setting.

Setting of a heritage asset: The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset, its surrounding and our understanding of it 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.

Can I write it myself?

For minor works where there is little or no impact on the historic asset and only a basic statement is required they can easily be produced without professional expertise. However, in other cases the scale of the proposed development, or the nature and importance of the

heritage asset(s) may require the Heritage Statement to be compiled by a suitably qualified professional consultant or contractor, with the necessary skills to assess the effects.

Sometimes, e.g. for large development or redevelopment schemes discussed with the Authority prior to an application being made, additional work may be required such as an archaeological evaluation or analytical building survey. In these circumstances the Authority may offer to supply a brief, outlining its requirements for the Heritage Statement. Examples might include a large factory conversion, a new road scheme, or a new housing development.

Why is a Heritage Statement required?

The purpose of Heritage Statements is set out in paragraph 128 of the NPPF, which states:

“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.”

As well as needing to comply with the NPPF the heritage statement should also be seen as a useful tool in developing any proposal. When considering the application the planning officer will need to establish if the proposal *conserves or enhances* the heritage asset. If in the production of the statement it becomes clear that the asset has needs or constraints the proposal can then be shaped around these.

Heritage Statements do not achieve their full purpose or value if they are prepared only between finalising plans and submitting them to a local planning authority.

When is a Heritage Statement required?

A Heritage Statement is required with all development proposals requiring planning permission or listed building consent, when the proposal directly involves a heritage asset, or affects the setting of a “heritage asset”. Some proposals will affect more than one asset, so the statement should address them all.

Heritage assets may be “designated” (i.e. they have been formally assessed and recognised as heritage assets under national designation regimes) or “non-designated” (i.e. identified by or through a local authority and acknowledged at a local level).

Heritage assets, designated under the relevant legislation, comprise:

- World Heritage Sites,
- Scheduled Monuments,
- Listed Buildings,
- Protected Wreck Sites,
- Registered Parks and Gardens,
- Registered Battlefields and
- Conservation Areas
- Non-designated heritage assets will typically be buildings, archaeological sites and historic parks or gardens that have value but have not yet been assessed or are of insufficient quality to merit designation at national level.

The compilation of a Heritage Statement will be applicable to the following types of proposal:

- Development requiring listed building consent
- Development within the curtilage of a listed building
- Development within the setting of a listed building
- Development within or adjoining Conservation Areas
- Development requiring Scheduled Ancient Monument Consent
- Development within the setting of a Scheduled Ancient Monument
- Development affecting a Registered Park or Garden of Special Historic Interest
- Applications affecting an unlisted building or non-scheduled site on the Historic Environment Record (HER).
- Applications affecting non-designated heritage assets identified by Exmoor National Park Authority during its consideration of applications. In these circumstances, the Authority accepts that a Heritage Statement may have to follow the rest of the application particulars, or that a submitted heritage statement may have to be amended. Pre-application discussion is encouraged and can enable such assets to be identified at an early stage.

Summary information on most of the sites listed above can be found online via the following sources:

Nationally designated sites

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

Exmoor Historic Environment Record

<http://www.exmoorher.co.uk/home>

Conservation Areas on Exmoor

<http://www.exmoor-nationalpark.gov.uk/planning/planning-policy/conservation-areas-planning>

Advice Note 2 “Making Changes to Heritage Assets” (February 2016), Good Practice Advice Note 2 “Managing Significance in Decision Taking in the Historic Environment” (March 2015), and “Conservation Principles, Policy and Guidance” (April 2008) are particularly relevant to heritage statements and their place in the planning system and can be found at: <https://historicengland.org.uk>

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 or request that it is withdrawn.

What should be included in a Heritage Statement?

A Heritage Statement needs to be relevant and appropriate, but also proportionate, depending on the scale and nature of the proposal and the heritage asset(s) affected. Small works, of small impact, require only simple heritage statements that can easily be produced without the need for special expertise. As each application is different it is not possible to provide a rigid template for what should or shouldn't be included in a heritage statement. However it should have three main sections.

Section 1: Identify and describe

The first section should identify and describe the heritage asset that may be affected by the proposed development. As the listing description is only a method to identify a listed building, and is unlikely to form a list of the key historic features, commenting only on the listing description is unlikely to meet the requirements of a Heritage Statement. It should also go beyond referencing the Historic Environment Record (<http://www.exmoorher.co.uk/>) as it should enable the reader to understand the context of the proposals being assessed in the next section.

Except in the case of very minor works, this section should also explain the “significance” of the site, i.e. the value of the heritage asset(s) to present and future generations because of its archaeological, architectural, artistic or historic interest (see NPPF 2012, Annex 2, glossary p56). The nature, level and extent of that significance should be explored (see Historic England Good Practice Advice Note 2, March 2015, paragraphs 8-10). <https://historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/>

Section 2: Assessment of the impact

Assessment of impact – this describes the impact of the proposed development, and how it will alter or affect the heritage asset(s) and the setting. In a National Park context, the rural character of the park will be an important material consideration when considering certain

planning applications. Questions to bear in mind while writing this section may include some or all of the following:

- 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 there any impacts anticipated from associated works e.g. ground works including for services and landscaping?
- Are the design details of any proposed new work clearly described in the Statement, to make up for any shortcomings in the submitted plans?
- Has a variety of options been considered and why was this option chosen?
- Are the works reversible in whole or in part?
- If the works have potential to materially affect the landscape character of the National Park, has due account been taken of Exmoor National Parks Local Plan 2011-2031?
- If the proposed works will result in any harm, is the harm offset or outweighed by any public benefits?

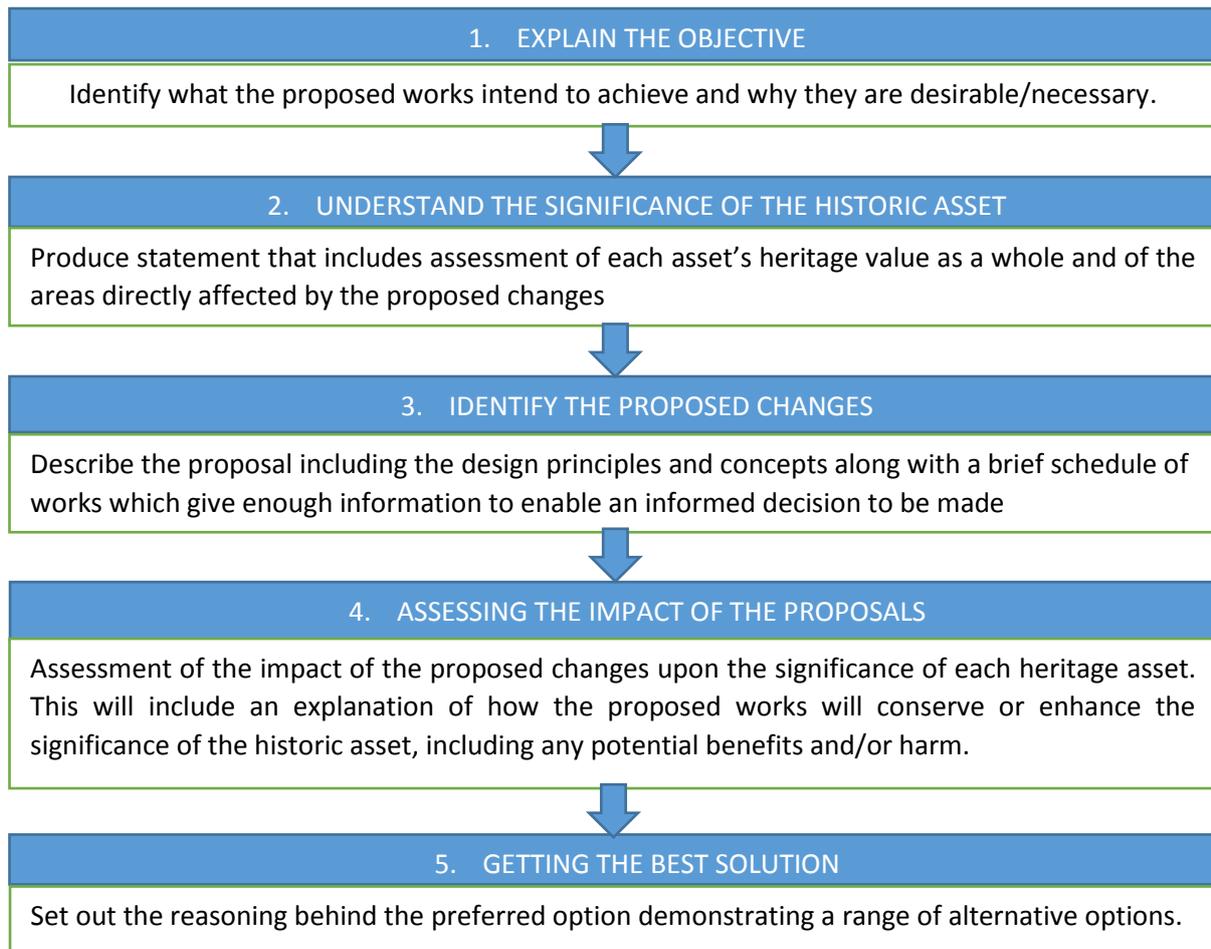
Section 3: Mitigation strategy

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 (e.g. 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. A mitigation strategy may be evolved or modified between the applicant and the National Park Authority during the processing of an application.

Photographs and drawings can be useful throughout the statement to highlight certain areas and can help keep the statement concise.

Heritage Statement Process



How do Design and Access Statement requirements relate to heritage assessments?

A Design and Access Statement is required to accompany certain applications for planning permission and applications for listed building consent. The legislation changed on June 25th 2013 and reduced the types of application where a Design and Access Statement is required.

A Design and Access Statement will now only be required for the following types of application:

- 1) Development categorised as “major”; (usually 10 or more houses or where the floorspace exceeds 1,000sqm)
- 2) Development within a Conservation Area where the applications is for
 - i) the provision of one or more dwellinghouse, or
 - ii) the provision of a building or buildings where the floorspace created is 100sqm or more.

Design and Access Statements provide a flexible framework for an applicant to explain and justify their proposal with reference to its context. In cases where both a Design and Access Statement and an assessment of the impact of a proposal on a heritage asset are required, applicants can avoid unnecessary duplication and demonstrate how the proposed design has responded to the historic environment through including the necessary heritage assessment as part of the Design and Access Statement.

Contact us

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We welcome enquiries and there is currently no charge given for advice. Historic Environment data can be requested by emailing HER@exmoor-nationalpark.gov.uk Please provide information on the site or developments extent.