

What is a 1. **Heritage Statement/ Assessment of Significance**? What is a 2. **Design and Access Statement**? And what is a 3. **Heritage Impact Assessment** and what is required under planning law. As heritage consultants we feel these 3 reports should be separate but obviously they are related, and we think they should be issued at different times in the planning application procedure so a heritage project can be heritage led.

1. A Heritage Statement

A Heritage Statement as a word does not exist as a definition in any planning policy, it is really a **Heritage Assessment** and should be an assessment of the building/structures significance. So who should write them? Anyone can write one but NPPF 2018 policy paragraph 189 states “assets assessed using appropriate expertise” The British Standards BS 7913 guide to ‘The Conservation Of Historic Buildings’ recommends “using competent qualified experts in the field of conservation when assessing significance”. Historic England guidance as set out in GPA2. MANAGING SIGNIFICANCE IN DECISION-TAKING IN THE HISTORIC ENVIRONMENT HISTORIC ENVIRONMENT GOOD PRACTICE ADVICE IN PLANNING: 2 advises using appropriate expertise 18. *‘Expert advice on where the significance lies and its sensitivity to change can unlock viable uses for the asset and secure its long-term future. It can also be very valuable in minimising and mitigating impact, therefore avoiding conflicts between the owner’s reasonable aspirations for the site and its conservation, particularly if it is sought early. Where the proposal is likely to affect the significance of heritage assets, early engagement with appropriate expert advice and the relevant local authority heritage advisers will be helpful both in developing an understanding of significance and in identifying the level of information needed to support the application and can be helpful throughout the process.’* Section 9. Then lists several established registers that can be used to identify appropriately qualified specialists or organisation.

This advice should be required at the early stages of a planning application particularly if the proposals seek to alter, refurbish or demolish any part internal or external of a listed building or designated asset. Presumably as stated above only those knowledgeable in the subject of architecture and structures, polite and vernacular, would be able to analyse the plan form, structure, fixtures and fittings, including attempting to date them, and so therefore these experts would be able to assess the significance of these elements. What is of high significance and should be retained and conserved and at the other end of the spectrum, what is low significance could be removed but should nevertheless be recorded.

This **Heritage Assessment of Significance** should be carried out independently with professional expertise without prejudice or perhaps not initially even any knowledge of what the proposals or proposer intends. This would mean reports will be unbiased and truthful. This report should be made available to the developer/owner who is the one who commissions such a report but also it should be deposited on the HER archives or NMR so there is a continuing record of the listed building/structure, no matter what the planning outcome. Of course as consultants we are aware for smaller repair work and listed building consent applications etc a Conservation Officer, if there is one, would be able to write their own assessments for smaller works. Once a building or structure has been assessed for its significance, which might not always be just the architectural merit but could be historical association with a famous person or event or have some communal importance that is important to conserve, a plan for any changes can be

drawn up. (A Design and Access Statement) Hopefully this plan will be sympathetic to the significance assessed as this should ideally be taken into account. This initial heritage assessment should provide additional information that allows the LPA to assess and understand the significance of the heritage asset that the application relates to. For example this information can be found by looking at old photographs, local maps, lists (such as tax returns – hearth tax, window tax, etc), fire insurance records, census returns or further investigation at the local records office, general research books (available at public libraries) or on the internet, investigation into archaeological records and consulting the appropriate HER. It is useful to include architectural phasing and evolution of how the building has changed over time and photographic recording of elevations, interior rooms and fixture and fittings. The plan for changes or proposals for Listed building Consent are usually put forward in a:-

2. Design & Access Statement

A Design & Access Statement is often written by the Architect/Developers themselves that usually includes the existing or proposed use for the building, the amount of work to be undertaken, the proposed layout, the scale of any extensions, replacement or new features, any changes to landscaping, any changes to the appearance of the building information on vehicular access, public transport links, etc. Sometimes it might not be possible to keep everything historic so some sort of mitigation would have to be assessed in the form of a:-

3. Heritage Impact Assessment.

This **Heritage Impact Assessment** could be carried out by any of the parties but probably should be undertaken by the heritage professional engaged for the Heritage Assessment [Number 1] or sometimes the LPA Conservation Team so they can propose the mitigation and any planning conditions and also this requires an expert input. A full understanding of the heritage asset significance is required. This should be completed in the **Heritage Assessment (Number 1)** , and this allows the proposed works to be compared to the impact of the asset. For larger projects, it should provide guidance on the mitigation works that have been allowed to reduce the impact on the asset. The principles of and justification for the proposed works and their impact on the special character of the listed building or structure, its setting and the setting of adjacent listed buildings may be required in support of an application for listed building consent. Mitigation should be included in the Heritage Impact Assessment but we feel it would be clearer to have any justifications which could be economic and viability provided in the Design & Access statement (Number 2)