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APPLICATIONS AFFECTING HERITAGE ASSETS

Guidance on preparing a
Statement of Significance



Updated November 2018

1 Guidance on preparing a Statement of Significance

2 Introduction

- 2.1 This guidance note has been prepared in order to assist applicants in preparing a “statement of significance” where an application will have an impact on any heritage asset. The Government introduced the need for a formal assessment in their policy document known as the National Planning Policy Framework 2012 (NPPF). This document has been revised and updated in July 2018 and it is hoped that the guidance note will help to improve the quality of submissions and reduce delays at validation and application stage. A Design and Access Statement is required where applications relate to heritage assets; depending on complexity the statement of significance can be incorporated into this or take the form of a stand-alone document. Generally with more complex proposals two separate documents will be necessary.

3 The NPPF

- 3.1 Chapter 16 of the revised NPPF (July 2018) sets out planning policies on the conservation of the historic environment and Paragraph 189 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.”
- 3.2 To meet the requirements of national planning policy Barrow Borough Council will expect applications affecting heritage assets to be accompanied by a suitable statement of significance before we will consider the application as complete and capable of being validated. Some developments may also require additional information such as structural surveys, protected species surveys (e.g. the presence of bats or owls) or archaeological investigations and you are asked to check requirements with the planning office at an early stage. This link will take you to Barrow Borough Council’s validation checklist:
<http://www.barrowbc.gov.uk/residents/planning/development-control/planning-forms-and-guidance/>
- 3.3 Applications will not be validated where the extent of the implications of the proposals on any heritage asset cannot be adequately understood from the supporting documentation.

Where a heritage statement is required and is not included or is lacking in content, the 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;
- Request that it is withdrawn.
- Refuse the application

4 What are Heritage Assets?

4.1 Designated heritage assets are defined as the following:

- Listed buildings
- Conservation areas
- Registered parks and gardens
- Scheduled ancient monuments
- Known archaeological sites

Barrow Borough is rich in heritage:

- Scheduled Monuments
- 2 grade I listed buildings
- 15 grade II* listed buildings
- 247 grade II listed buildings
- 11 conservation areas
- 1 registered park and garden

4.2 A “local list” is to be prepared as part of the Council’s Local Plan work and a statement of significance will also be required for applications that affect these non-designated heritage assets or any archaeological sites. Additionally, statements may be required for non-designated heritage assets not included on a local list. Please check before submitting an application.

5 When are Statements of Significance required?

5.1 To ensure the requirements of the NPPF are met, we will require that a Statement of Significance is submitted before we validate the following types of application:

- Applications for listed building consent or affecting the setting of listed buildings
- Applications within the curtilage of a listed building
- Applications in conservation areas (including planning applications)
- Applications affecting Scheduled Ancient Monuments
- Applications affecting a Registered Park or Garden of Special Historic Interest;
- Applications affecting an archaeological site
- Applications affecting unlisted buildings or structures identified by the Borough Council as heritage assets in the “local list” or for certain other non-designated assets

6 What should a Statement of Significance include?

- 6.1 The scope and degree of detail which is required in a statement of significance will vary according to the complexities of the proposal. The statement should be proportionate to the situation, but should contain sufficient information as detailed in this guide. A more complex proposal will generally require specialist input.
- 6.2 Referenced photographs are always useful to illustrate any historic features referred to in the text. Historic maps, sequential historic development plans, colour coded floor plans by age of construction and photographic surveys are also useful to include, particularly for more complex cases.
- 6.3 There are however a number of basics which all statements of significance will need to cover.

A Statement of Significance should always have three parts:

- An assessment of the heritage significance
 - An assessment of the impact of the proposals
 - A mitigation strategy
- 6.4 For small to medium-scale works this can take the form of a table. The table in Appendix A can be used as a tool to enable applicants to fully assess and understand the significance of the heritage asset or the part of it being affected and the potential impact of the proposed works on that significance. The contents of the table will need to demonstrate that the appropriate level of research has been carried out. A full description of how the proposal will affect the specific significance of the part of the building/structure in question needs to be included in the table. An example is included in Section 9.3.
- 6.5 Supporting information may include:
- A location plan of suitable scale showing the site, its size, extent and context;
 - The boundary of the assets should be annotated and this will assist in an initial assessment of setting;
 - All necessary large scale existing plans, elevations, site levels, sections, context drawings and perspectives of the heritage asset, its setting and wider context;
 - A sequential historic development plan including any internal changes known;
 - Photographs, dated, numbered and cross-referenced to a plan;
 - Any available information from the Historic Environment Record
 - Information from early maps

Where archaeology is affected a desk-based archaeological assessment and an archaeological evaluation report may be required. The assessment should address issues relating to archaeological investigation of the site initially based on existing published material and the preservation and/or recording of historic or archaeological importance.

In these cases you are advised to discuss what is required at an early stage of your proposal with the County Council's Historic Environment Officer.

<https://www.cumbria.gov.uk/planning-environment/countryside/historic-environment/default.asp>

- 6.6 Section 11 includes a list of useful contacts for cases where specialist input is required.

7 Assessing Heritage Significance

- 7.1 This is a statement of significance which demonstrates an understanding of the aesthetic, historical, communal and evidential interest of the site and its setting and in particular the significance of those parts affected by the proposed works. Understanding significance is a key principle for managing change in the historic environment and is embedded in current government policy (NPPF, 2018). Historic England's "Conservation Principles Policies and Guidance" <https://content.historicengland.org.uk/images-books/publications/conservation-principles-sustainable-management-historic-environment/conservationprinciplespoliciesguidanceapr08web.pdf> sets out a method of thinking systematically and consistently about the heritage values that can be ascribed to a place and grouping them according to four overarching terms. It will help you in preparing your statement if you consider each of the headings in turn:

Aesthetic – "Value deriving from the ways in which people draw sensory and intellectual stimulation from a place". It includes the visual qualities and characteristics of the asset (settlement site or building), long views, legibility of building form, character of elevations, roofscape, materials and fabric and special features of interest. Aesthetic value could be either consciously designed or fortuitous based on gradual change over time.

Historical – "Value deriving from the ways in which past people, events and aspects of life can be connected through a place to the present". It includes the age and history of the asset, its development over time, the strength of its tie to a particular architectural period, the layout of a site, the plan form of the building, internal features of special character including chimneybreasts, fireplaces, decorative plasterwork etc. Historical value can be illustrative, such as related to a changing technology or period in time, or associative, being connected to a particular person.

Communal – "Value deriving from the meanings of a place for the people who relate to it or whom it figures in their collective experience or memory." It could be commemorative or symbolic such as a war memorial or social such as a market square.

Evidential – "Value deriving from the potential of a place to yield evidence about past human activity". It may include consideration of the evolution of the asset, phases of development over different periods, important features, evidence in building fabric or potential for below ground remains.

7.2 It will help to consider:

- What listed building or conservation area does the asset form part of?
- What is the approximate age?
- How has it developed over time?
- What are the main characteristics; i.e. its style, materials, features, window and architectural form?
- What is the street scene? Is it residential or commercial?
- What is the building form and type? Is it suburban or rural vernacular?
- How does the asset contribute to the historical character of the area?
- Is it one of a kind or part of a terrace or group?
- Are there any distinctive features?
- How does the setting contribute to the character and appearance?
- Is it a work from a renowned architect or practice? (For example the Abbey House Hotel designed by Lutyens or one of the Barrow buildings designed by Paley and Austin).

8 Assessing the Impact of Proposals

8.1 It will be useful to consider the following:

- What part of the asset will be affected?
- Will the proposed development be visible from any public viewpoints?
- Will the proposal involve loss or change to any original feature?
- Will the proposal affect any archaeological remains?
- For extensions and new builds, what would be the impact on the appearance, character and setting?
- For small scale alterations: if not a like for like repair/replacement, what would be the visual impact? Would it preserve or enhance the character and appearance of the asset and the streetscene?
- Are there any heritage benefits, such as allowing the significance to be better revealed?
- What is the scale and nature of any harm?
- Can the works be justified in terms of benefits?

8.2 The statement should clearly demonstrate that you have considered the relevant issues and sought to preserve the special appearance and architectural character of the area.

9 The Mitigation Strategy

9.1 The Mitigation Strategy explains what steps have been taken to avoid, minimise or mitigate any harm to the significance of the assets.

9.2 A mitigation strategy should consider the following:

- 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 the significant fabric or archaeological deposits?
- 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? Would a free-standing building be better than an extension?
- 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 or archaeological features that would be obscured damaged or destroyed.

9.3 Example 1 gives a proportionate level of detail for small scale works. The "proposed works" column should include all work listed item by item no matter how small. The "impact" column should include an assessment of the proposals on the significance of the asset, including the level of harm and any justification as well as how loss of significance has been minimised.

Example 1 – Small scale works what to include

Proposed works (itemised)	Significance of the historic fabric that will be affected	The impact of the proposed work(s) on the historic fabric/area	Any mitigation required
<p>Replacement of modern front door and modern casement windows with timber panelled door and timber sash windows.</p>	<p>The property is a Grade II listed building and also falls within the Dalton Conservation Area.</p> <p>The property dates from around 1850 although the door and windows date from the 1980's and are of a contemporary design of little historic or evidential value.</p> <p>The window surrounds are of square sectioned sandstone and are thought to be original and there is a sandstone mullion over the doorway. They are of aesthetic and historic value.</p>	<p>The modern door and windows are inappropriate in terms of style and detailing and the replacement with a traditional panelled timber door and sash windows is considered to be an enhancement to the listed building and the conservation area.</p> <p>No loss of historic fabric will result from the proposed works. The window surrounds and door mullions are unaffected.</p> <p>The historic photograph provides evidence that a sash window would have been the original style of window and the design approach therefore avoids conjecture.</p>	<p>None required</p>

Supporting information for this example could include a copy of the listing description, an extract from the conservation area appraisal and historic map and cross-referenced and dated photographs. Any historic photographs of the property or street would be useful to justify the chosen design of window/door.

Example 2- Medium scale works; what to include

Proposed works (itemised)	Significance of the historic fabric that will be affected	The impact of the proposed work(s) on the historic fabric/area	Any mitigation required
<p>The dining room will be subdivided to create apartments.</p> <p>The partitions will be created below the existing ornate ceiling which will remain undamaged.</p>	<p>The property is a Grade II listed building dating from 1870.</p> <p>The ceiling is thought to be original and is specifically referred to in the listing description as being highly decorated.</p> <p>The walls are plain and have been re-plastered in a modern finish.</p> <p>The ceiling is of very high significance and is of aesthetic, historic and evidential value.</p>	<p>Less than substantial harm is likely to result.</p> <p>The ceiling will remain in situ above the newly constructed apartment ceilings and there is no loss of historic fabric. New stud walls will not be fixed to historic plaster.</p> <p>Whilst the spaciousness of the original room will be lost the work is reversible and non-invasive allowing a return to the original layout if required at some point in the future.</p> <p>The new ceiling will not be readily visible from the exterior of the property, sitting above the top of the sash windows, which are to be restored.</p> <p>Additionally, new services can be hidden in the void avoiding damage to original fabric.</p> <p>The modest harm is felt to be outweighed by the public benefit of securing a viable use for the listed building.</p>	<p>Record ceiling before work commences. Ensure no fixings or drilling takes place in the plasterwork and that the new ceiling sits below the existing one.</p> <p>All contractors to be made aware of significance of listing.</p> <p>Monitoring to take place during works to assess the effects of any vibration on plasterwork.</p> <p>New services hidden in void rather than destroying historic fabric.</p>

Supporting information for this example could include historic maps, a copy of the listing description, historic photographs and close-up photographs of the ceiling and sectional drawings to illustrate the design of the proposed ceiling and stud walls.

- 9.4 Larger scale works may relate to the scope of the proposal, the size of the asset or the amount of change proposed. A thorough analysis of the effect on the asset will be required and you will need to engage appropriate expertise. You should discuss large scale proposals with the Planning Office at an early stage. In addition, Historic England offer a pre-application advice service which you are also encouraged to use. The recommended approach for larger scale proposals is to use the Conservation Principles outlined in Historic England’s publication, “Conservation Principles, Policies and Guidance: Sustainable Management of the Historic Environment” (April 2008). Any justification of the proposals should reference the conclusions of the appraisals.
- 9.5 The following layout is suggested to provide a clear understanding of the asset and demonstrate a sustainable approach to its management.

Understanding the Asset	
Statutory and non-statutory designations	Listed buildings and grade, curtilage structures, conservation area, local list etc.
Historical outline	Sources of information in Section 12 will be useful.
Summary of significance	<p>“Conservation Principles” refers to the following values:</p> <p><i>Evidential value</i></p> <p><i>Historic value</i></p> <p><i>Aesthetic value</i></p> <p><i>Communal value</i></p>
The Proposal	
Summary	Description of the proposal and the design ethos.
Policy background	Relevant national and local plan policies and any conservation management plan policies.
Options appraisal	To demonstrate exploration of all reasonable alternatives and consideration of mitigation strategies.
Design philosophy	<p>Demonstrate how the design solution has been arrived at which sustains the significance of the heritage assets.</p> <p>Why has that design been chosen?</p>
Justification for the proposal	Based on the optimum choice following the options appraisal, assessment of significance and identification of the effect of the proposals on the significance of the asset.

10 How will my application be determined?

- 10.1 The Heritage Statement plays an essential part in determining your application. Providing well-structured information will make it easier to assess the impact of your proposal and thus speed up the determination process. Failure to provide the right level of information is likely to result in long delays and/or ultimate refusal.
- 10.2 Statutory consultees such as the Victorian Society and the Campaign for British Archaeology often object to applications on the basis that the statement of significance is inadequate. Putting effort into preparing a thorough statement of significance is good practice and can help to avoid objections and subsequent delays or even refusals of consent.
- 10.3 Your application will be determined according to the following planning policy with which you or your agent should be familiar:
- Department for Communities and Local Government (2018) National Planning Policy Framework <https://www.gov.uk/government/collections/revised-national-planning-policy-framework>
 - Barrow Borough Council Local Plan <http://www.barrowbc.gov.uk/residents/planning/planning-policy/saved-local-plan>
- 10.4 In addition, Sections 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 provide that, when a local planning authority considers whether to grant planning permission for development that affects a listed building or its setting, it must have “special regard” to the desirability of preserving the building, its setting and any special architectural or historic features. In guidance on section 66(1), the Court of Appeal has decided that decision makers should give “considerable importance and weight” to the desirability of preserving the setting of listed buildings. Similarly Section 72 of the same Act requires that in relation to development within conservation areas special attention shall be paid to the desirability of “preserving or enhancing” the character or appearance of that area.

11 Expert resources

- 11.1 An “expert” means an appropriately qualified and experienced individual or organisation such as a conservation professional (Institute of Historic Building Conservation registered), an archaeologist (Institute of Field Archaeologists registered) an architectural historian or an historic buildings architect.
- 11.2 For medium to larger scale proposals, or if you need support in assessing significance, you are recommended to engage appropriate expertise:
- The IHBC database of accredited practitioners is available here: http://www.ihbc.org.uk/resources_head/acc_practicioners/index.html

- The Register of Architects Accredited in Building Conservation (AABC: Architects)The architects listed on this Register have all been assessed as to their individual knowledge and experience in conservation work by their peers in a team which also included a knowledgeable non-architect to ensure an element of public participation in the assessment process. - See more at: http://www.ihbc.org.uk/resources_head/specialist_registers/index.html#sthash.UspbEZEB.dpuf
- RIBA Conservation Register (RIBA: Architects)The RIBA Conservation Register enables those looking to commission work on heritage buildings to find architects with the specific skills and experience they require, encompassing all aspects of historic building conservation, repair and maintenance. The Register has three levels of membership. - See more at: http://www.ihbc.org.uk/resources_head/specialist_registers/index.html#sthash.UspbEZEB.dpuf
- Surveyors accredited in building conservation (RICS: Surveyors) Contact details of the many Chartered Surveyors accredited by RICS in building conservation. - See more at: http://www.ihbc.org.uk/resources_head/specialist_registers/index.html#sthash.UspbEZEB.dpuf
- The Conservation Accredited Register for Engineers is available at www.careregister.org.uk

12 Useful sources of information

12.1 There are a wide range of resources and further sources of information available to help you write your statement of significance:

- The National Heritage List for England provides details of all nationally designated heritage assets with location maps <https://historicengland.org.uk/advice/hpg/heritage-assets/nhle/>
- The National Monuments Record (NMR) Centre is Historic England's publicly accessible archive of the historic environment with over 10 million photographs, plans, drawings and reports. The centre also offers for a cost a "Local Studies Pack" which includes a register of listed buildings in the area, archaeology and historic aerial photographs: nmrinfo@english-heritage.org.uk
- Images of England contains (modern) photographs of listed buildings within the Borough, together with listing descriptions: www.imagesofengland.org.uk
- The Archaeology Data Service is an online resource of archaeological data. The name of a village or town can be searched for information relating to that settlement: <http://archaeologydataservice.ac.uk>

- MAGIC is an interactive map service which brings together environmental information from across government. It includes information on Scheduled Monuments and many other types of designation: <http://magic.defra.gov.uk/>
- Historic maps such as tithe maps and old ordnance survey maps are available to view by appointment at our offices or in the local archive offices - these can be useful in identifying changes to the size and form of buildings as well as their settings or simply identifying the approximate age of a building.
- Early maps, including Ordnance Survey 1st and 2nd Edition can be consulted at the relevant County Record Offices. Small extracts can be viewed at: www.old-maps.co.uk
- The HELM website, managed by English Heritage, is a good source of information on planning and the historic environment. www.helm.org.uk/
- British Listed Buildings website for details of listed buildings <http://www.britishlistedbuildings.co.uk/>
- The Cumbria Historic Environment Service maintains the County's Historic Environment Record and provides advice: <http://cumbria.gov.uk/planning-environment/countryside/historic-environment/default.asp>
- The Cumberland and Westmorland Antiquarian and Archaeological Society has published a number of useful documents: <http://cumbriapast.com/cgi-bin/ms/main.pl>
- National Amenity Societies such as the Society for the Protection of Ancient Buildings (SPAB), The Georgian Group, The Victorian Society and The Twentieth Century Society publish extensive material on their websites and in books and journals
- Cumbria Vernacular Buildings Group: <http://www.cvbg.co.uk/>
- Cumbria Local History Federation: <http://clhf.org.uk> An excellent resource site for local history societies.
- Cumberland & Westmorland Antiquarian & Archaeological Society
- (CWAAS) <http://cumbriapast.com>
- <http://www.heritagegateway.org.uk/gateway/chr/herdetail.aspx?crit=&ctid=90&id=4719>
- <http://www.francisfrith.com/uk/barrow-in-furness>
- <http://www.dockmuseum.org.uk/barrows-history>

13 Useful publications

- Clark, K (2001) Informed Conservation, English Heritage. Detailed guidance on understanding and recording the historic environment.
- Brereton, C (2012) The Repair of Historic Buildings, Advice on Principles and Methods, Historic England
- Historic England (2008) Conservation Principles, Policies and Guidance: Sustainable Management of the Historic Environment available online at: <https://historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/>
- Historic England (July 2015) Managing Significance in Decision-Taking in the Historic Environment, Historic England Good Practice Advice in Planning 2: <https://historicengland.org.uk/advice/planning/planning-system/>
- Historic England (July 2015) The Setting of Heritage Assets-Good Practice Advice in Planning 3: <https://historicengland.org.uk/advice/planning/planning-system/>
- Climate Change and Your Home - information on climate change and guidance on its impact on traditional buildings is available at: <http://www.climatechangeandyourhome.org.uk/live/> and <http://www.buildingconservation.com/articles/conservation-and-heritage-statements/conservation-and-heritage-statements.htm>
- Pickles, D, McCaig, I & Wood, C (April, 2015) Traditional Windows: their care, repair and upgrading, Historic England, available online at: <https://historicengland.org.uk/images-books/publications/traditional-windows-care-repair-upgrading/>

14 Locally relevant publications

A useful list of locally relevant publications includes:

- Pevsner, N (1967), The Buildings of England, Cumberland and Westmorland
- Hyde, M (2010), Cumbria, The Buildings of England (Pevsner Architectural Guides)
- Denyer, S (1991), Traditional Buildings and Life in the Lake District
- Brunskill, R.W (2000), Vernacular Architecture, An Illustrated Handbook
- Brunskill, R (1978), Vernacular Architecture of the Lake Counties, A Field Handbook

- Brunskill, R (2010) Traditional Buildings of Cumbria (Vernacular Buildings Series) Paperback
- Andrews, M. (2012), The Furness Railway: A History
- Marshall, J.D. 1958. Furness and the Industrial Revolution
- Whellan, W. 1860. The history and topography of the counties of Cumberland and Westmorland, with Furness and Cartmel in Lancashire
- Bulmer, T & Co. 1900. History, topography, and directory of Furness and Cartmel, comprising its history and archaeology, physical and geological features. 2nd edition 1911.
- Marshall, J.D (1981), Furness and the Industrial Revolution
- Richardson, J (2015) Barrow in Furness, Its History, Development, Communities, Industries and Institutions
- Walton, E (1984), A History of Dalton-in-Furness
- Jepson, G (2016), Barrow in Furness Through Time
- Garbutt, J (2010), Barrow and Low Furness, Past and Present
- Trescaheric, B (1998), The Last Place God Made: A History of Victorian Barrow.
- Trescaheric, B (2000), The Barrow Story: Victorian Farming Village to Shipyard Town
- Mannex, P. & Co. 1876. History & directory of Barrow in Furness, and the whole of North Lonsdale.
- <http://www.lindal-in-furness.co.uk/History/history.htm>
- <http://www.daltoncouncil.org.uk/1732852004.html>
- <http://www.british-history.ac.uk/vch/lancs/vol8/pp304-319>

Please be aware that this list is by no means exhaustive, and that other sources of useful information may exist. This list of information sources will be added to online as the Authority becomes aware of any useful resources. Please feel free to make suggestions to us to add to our list.

Appendix 1 – Sample Template (Please print off and use)

Proposed works (item by item, internal and external)	Significance of the fabric/area that will be affected	The impact of the proposed work(s) on the historic fabric/area	Any mitigation measures

GLOSSARY

Designated heritage asset:

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

Non-designated heritage asset:

A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions. These shall normally be identified by the local planning authority during the pre-application enquiry stage, during decision-making or through the plan making process.

Setting:

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.

Significance:

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.