

GLOUCESTER CITY COUNCIL

GUIDANCE ON THE PREPARATION OF HISTORIC ENVIRONMENT STATEMENTS

What are heritage assets?

Conservation areas, listed buildings, other locally listed buildings, registered parks and gardens, and archaeological remains are also known as heritage assets. Most development affecting heritage assets needs planning permission or consent. This helps the Council to manage change to the historic environment.

What is a Historic Environment Statement?

“Historic Environment Statements” (also known as a Heritage Statement) are documents that support applications for planning permission and/or listed building consent to justify proposals that impact heritage assets. Historic Environment Statements are a written document that includes an analysis of *significance* and the principles and justification for the proposed works and their impact upon significance

The requirement for historic environment statements is set out within paragraph 189 of the National Planning Policy Framework (NPPF) which states that: *“Local planning authorities should require an applicant to describe the significance of any heritage assets affected including any contribution made by their setting”*.

Significance is identified in annex 2 of the NPPF as *“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”*.

When is a Historic Environment Statement required?

Statements are needed for any development proposals for planning permission or listed building consent applications which affect any heritage asset type.

Therefore, a Historic Environment Statement is required for all applications affecting listed buildings, unlisted buildings in conservation areas or locally listed buildings, registered historic parks or gardens, or affecting known archaeological sites. A Historic Environment Statement is also required for applications affecting the setting of any of the above.

Applications for demolition within conservation areas should also include the supporting evidence and justification required by paragraph 195 of the National Planning Policy Framework (NPPF).

A Historic Environment Statement may also be requested if the Council identifies the building or site as a non-designated heritage asset during the pre-application or application process.

What information should a Historic Environment Statement include?

Depending on the status of the asset being assessed the Historic Environment Statement could form part of a Design and Access Statement, but should contain sufficient detail to assess the history and character of the building, site or area and justify the proposed works in terms of their impact on the heritage asset. The statement should set out the significance of the asset and its setting, and should be detailed enough that the impact of the proposed works on the significance and setting can be properly assessed by the local planning authority. National Planning Practice Guidance provides that Design and Access Statements accompanying applications for listed building consent must include an explanation of the design principles and concepts that have been applied to the proposed works, and how they have taken account of:

- (a) the special architectural or historic importance of the building;
- (b) the particular physical features of the building that justify its designation as a listed building; and
- (c) the building's setting

The scope and complexity of a Historic Environment Statement will vary depending on the extent of the proposals and the importance of the heritage asset. Larger development proposals that include demolition and new build in a conservation area will require a more in-depth approach than, for example, the replacement of a boundary wall or a front door. Similarly, the scope and depth of information required for an application for listed building consent will be much more than for planning permission for works to a locally listed building. Where partial or total demolition is proposed a detailed condition survey will be required, together with, details of efforts to retain the asset in use e.g. marketing information.

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 and provide a justification for the proposed works and their impact on the significance of the asset and its setting Information on any sources and expertise that has been consulted should also be provided.

It may be appropriate to consult the Gloucestershire Historic Environment Record (HER) for information on the history of the building, site or area [Gloucestershire HER](#). Applicants should discuss the evidence requirements with the conservation officer before producing the historic environment statement, but in general the HER would only need to be consulted when substantial changes to Listed Buildings are proposed.

The National Heritage List produced by Historic England should always be consulted. Sources such as historic map, deeds, photographs, plans etc. are available to help inform Historic Environment Statements to enable the understanding of significance.

In addition, information on listed buildings in Gloucester City is available on: [Gloucester City Listed Buildings](#) Relevant local plan policies should be assessed [Planning Policies](#) and Conservation Area Appraisals should be consulted where appropriate [Gloucester City Conservation Area Appraisals](#) .

The Historic Environment Statement should be prepared by an appropriate professional with the necessary expertise to assess properly the heritage asset and its significance. For buildings or sites of high significance it is recommended that the statement be prepared by an architectural historian, an accredited conservation architect or qualified archaeologist. 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.

Other information may inform or be needed to understand the potential impact upon heritage assets, such as the proposed schedule (specification) of works and structural surveys or setting assessments in accordance with Historic England's Historic Environment Good Practice Advice in Planning Note 3 "The Setting of Heritage Assets". This document sets out guidance on managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas, and landscapes.

<https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>

For archaeological sites an archaeological desk-based assessment or archaeological survey/evaluation may be required in the form of professional research and investigation, such as geophysical survey or necessary archaeological evaluation via trial trenching. This will be informed and advised upon by the City Council's Archaeologist.

Reference to statutory legislation and relevant planning policies, national and local will also be necessary to justify proposals.

Where can I get further information, sources & help?

Government policy and guidance:

National Planning Policy Framework – Section 16 Conserving and Enhancing the Historic Environment [NPPF Historic Environment](#)

National Planning Practice Guidance – Conserving and enhancing the historic environment <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>

Historic England Good Practice Advice in Planning – Notes 1-3

<https://historicengland.org.uk/images-books/publications/pps-practice-guide/>

Historic England: Conservation Principles, Policy & Guidance [Historic England Conservation Principles](#)

Gloucester City Council: Planning Policy and Guidance
[Planning Policies](#)

Gloucester City Council: Conservation Area Appraisals
[Gloucester City Conservation Area Appraisals](#) .

Gloucester City Council: Listed Buildings (Please note that this schedule is indicative only, and does not necessarily identify every listed building or structure in Gloucester. If unsure

about the status of a buildings please contact the Conservation Team). [Gloucester City Listed Buildings](#)

Other Useful Sources and Contacts

Royal Institute of British Architects list of registered architects <https://find-an-architect.architecture.com/FAAHome.aspx>

Register of Architects Accredited in Building Conservation which was established with the support of Historic England [Building Conservation Accredited Architects](#)

Conservation Accreditation Register for Engineers (CARE) <https://www.ice.org.uk/ICEDevelopmentWebPortal/media/Documents/Careers/specialist-registers/rgn-6-conservation-accreditation-register-for-engineers.pdf>

Institute of Historic Building Conservation [IHBC](#) and companies who specialise in historic building conservation may be registered with its Historic Environment Service Providers Recognition <http://www.ihbc.org.uk/hespr/>

Chartered Institute for Archaeologists <http://www.archaeologists.net/>

Consultants or specialists, depending on their field of expertise may also be members of other specific professional bodies, for example –

The Royal Town Planning Institute <https://www.rtpiconsultants.co.uk/#/>

The Institution of Structural Engineers <https://www.istructe.org/finding-a-structural-engineer>

The Royal Institute of Chartered Surveyors <https://www.ricsfirms.com/>

The Victorian Society <https://www.victoriansociety.org.uk/>

Society for the Protection of Ancient Buildings (SPAB) <https://www.spab.org.uk/>

The Building Conservation Directory also provides contact details for many consultants, specialists and contractors who specialise in building conservation. <http://www.buildingconservation.com/>