Understanding heritage significance in planning decisions in England: The current state of play

John Somers1

1School of Architecture and Cities, University of Westminster, London, UK

Contact: j.somers@westminster.ac.uk

Abstract

This research focuses on the challenges contained within the urban planning system of England which is meant to aid historic environment decision making for Local Planning Authorities (LPA) across the country. Alongside Historic England’s value system there is a vast amount of guidance on how to properly understand the values to determine the significance of a heritage asset which extend from purely the aesthetic to looking at a holistic approach containing intangible and tangible values. There are also difficulties such as confusion over the mechanisms needed to present a holistic understanding of the historic environment. This research seeks to analyse the extent to which these forms of guidance along with policy documents are influencing understanding of the significance of heritage assets within England. In order to gain insight a case study approach was adopted to examine five randomly selected heritage statements from five LPAs, resulting in 25 heritage significance statements. This approach enabled an initial understanding of some of the actors contributing to what was found to be an overall lack of quality, appreciation, or comprehension of the influence significance and value have in planning decisions~~making~~ about the historic environment. This has implications in terms of how we educate built environment practitioners, the accessibility  of information, the lack of professional recognition, and the underpinning of legislation when it comes to the historic environment.

Keywords: heritage value, significance, tangible heritage, intangible heritage, decision-making,, urban planning

# Introduction

In England, the heritage value-led approach to assessing the significance of heritage assets is acknowledged by the government’s historic environment advisor, Historic England as the way of undertaking an assessment of significance for managing, maintaining, altering, conserving, and decision making in the built environment. The statement of significance is the vehicle for undertaking the assessment of Heritage Values to understand the tangible and intangible attributes of a Heritage Asset,1 its fixtures and fittings, or its setting in order to understand the significance of components, as well as the building or site’s capacity for change. The concept of significance is pivotal as it underpins decision making for the historic environment and can result in both the preservation, conservation; and also via a lack of understanding, education or appreciation; also the deliberate or unintended destruction of our historic environment and cultural heritage which are irreplaceable.2

***The beginnings of a value system for the historic environment***

The development of the concept of heritage value stems from discussions of authenticity and preservation of monuments and artwork from the nineteenth century. Although not specifically referring to heritage value per-se, notable authors of this time such as Ruskin3 spoke of the lamp of life where architecture stems from the mind of man, and the lamp of memory where architecture can preserve the inheritance of past ages. Additionally, William Morris4 who was influenced by Ruskin’s work was amongst founding members of the Society of Protection of Ancient Buildings (SPAB) who published a manifesto in 1877 calling for the adoption a set of conservation principles that emphasised the importance and authenticity in historic fabric where modern tools, arts and craftmanship cannot meddle without destroying.5 These writings appear to have more linkage to discourse around authenticity, however this is very closely linked to ideas around how heritage is valued in terms of preservation, maintenance and restoration. One of the earliest mentions of the term heritage value was by Alois Reigl6 which specified three heritage values – Deliberate Commemorative Value; Historical Value and Age Value. Ahmer7 and Harrer8 see influences of Reigl and the movement towards authenticity and valuing heritage as setting the foundations for international charters such as the Athens Charter,9 the Venice Charter,10 and the formation of the UNESCO World Heritage Convention11. The principles developed from these international charters continue to frame debates about conservation and heritage management practices. The formation of the International Council of Monuments and Sites (ICOMOS) in 1965 led to member governments to explore how to best preserve their historic environment through meetings of the World Heritage Committee.

However, member countries of ICOMOS had differing approaches to conserving heritage. Lesh12 discusses the tension between Australian heritage practitioners who were discontent within these ICOMOS meetings with European (and British) heritage practitioners whose approach to heritage dominated urban conservation. The uniqueness of Australian heritage required a different approach that challenged European philosophies around conservation. In 1979, this led to the Australian ICOMOS group, led by Dr. Miles Lewis and Dr. James Semple-Kerr, publishing of The Australia ICOMOS Guidelines for the Conservation of Places of Cultural Significance, which became known as the Burra Charter.

The Burra Charter illustrated guidelines and principles for the management of places; rather than buildings or monuments that formed the European focus at the time. The Burra Charter utilised its own heritage values of Scientific, Aesthetic, Historic and Social Values for past, present and future generations to assist in explaining how to value and manage sites and significance13. This differed from the European philosophy as the Burra Charter sought to define intangible and cultural heritage such as story telling, experience, involvement and awareness of context and culture. Intangible heritage was given equal weight to considerations around the more tangible and visual aspects.

Whilst the Burra Charter did not provide guidance to the understanding of significance, this was undertaken by Semple-Kerr14 which further developed the concept of cultural heritage management and managing sites through change. These contributions remain as one of the most influential publications in changing the way heritage philosophy has been undertaken across the ICOMOS member countries considerations around intangible heritage.

This history has assisted in paving the way for how heritage is valued within the historic environment where academics and professionals have sought to categorise the components or actors that are needed to understand what is important when considering heritage assets both in the UK and around the world.

For England, the creation of the National Heritage Act 1980 altered the way that heritage assets were managed and protected, and established the National Heritage Memorial Fund that could provide grants for the restoration of historic buildings. The subsequent National Heritage Act 1983 established the Historic Buildings and Monument Commission, later English Heritage and since 2015, Historic England, the Government’s statutory advisor for the management of the nation’s historic environment. As part of this process of grant funding, applicants were required to understand the significance by the submission of a Conservation Management Plan using both tangible and intangible values, and develop a management plan that was inspired by guidance, such as from Semple-Kerr’s Conservation Plan.

***The application and use of the value system in England***

Avrami and Mason15 view heritage values as ‘the different qualities, characteristics, meanings, perceptions, or associations ascribed to the things we wish to conserve.’ Additionally, Fredheim & Khalaf16 define values as the ‘identification, sustaining and enhancing of significance where significance is understood as the overall value of heritage, or the sum of its constituent ‘heritage values.’ In today’s system of historic environment decision making and management, value systems are a commonly used term within heritage circles which Smith17 refers to as the ‘global common sense’ where predominantly Western countries represented under the ICOMOS banner have come together in conferences over the past century to attempt to agree on principles or values that arise from debates on how to manage, conserve and care for historic sites.

As a member of ICOMOS, the United Kingdom (UK) like other countries has implemented their own version of a heritage value system within planning involving considerations of applications for alterations within the historic environment. Within the UK, decision making for the purposes of planning is divided into Acts of parliament where there are similar but different planning legislation and policy governing the devolved nations. This research will purely focus upon England’s planning system where decision making for the historic environment is governed between two most commonly used Acts, the Town and Country Planning Act 1990 and the Planning (Listed Buildings and Conservation Areas) Act 1990 (PLBCA).18

An interesting observation of the law is that the need to understand heritage value has never been incorporated into it, but has always formed part of guidance that forms a material consideration to decisions. Neither of the Acts specified above mention the terms heritage value or authenticity. The closest the legislation comes is the PLBCA (1990) which states that a decision maker ‘shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.’19

Where buildings are considered to be of national importance there in assessment of a heritage asset’s architectural and historic interest that is undertaken by Historic England where assets of national importance are protected via a listing. In these cases, additional listed building consent may be required in order to protect this special interest. In order for a heritage asset to become listed under the PLBCA, it is assessed by Historic England in accordance with principles such as age, rarity, selectivity, and national interest, amongst others.20 Confusingly, whilst buildings are listed for their national architectural and historic interest, decision making and management of the historic environment revolves around considering harm to the significance of a heritage asset, where significance comprises the sum of relevant tangible and intangible heritage values. Whilst significance and national importance have similarities, they are in fact different, where importance refers to the listing process and significance refers to the management, conservation and preservation process.

Whilst initially beginning its life as an internal document for staff use, in 2008 English Heritage (now Historic England) published their ‘Conservation Principles, Policies and Guidance.’ The document which was aimed at being guidance to assist planning decision making highlighted that in their opinion to understand the significance of heritage assets, one must be able to understand both tangible and intangible values. The document introduced four main heritage values:

* *‘Historic Value: derives from the ways in which past people, events and aspects of life can be connected through a place to the present. It tends to be illustrative or associative;*
* *Evidential Value: derives from the potential of a place to yield evidence about past human activity;*
* *Aesthetic Value: derives from the ways in which people draw sensory and intellectual stimulation from a place.*
* *Communal Value: derives from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory;’21* and
* Other values such as archaeological, spiritual, cultural, artistic, amongst others.

The values whilst defined, appear to be deliberately broad in order to attempt to catch all facets of values which might be important to consider in understanding the significance of a heritage asset as it is appreciated that value can take many forms. This methodology of assessing significance through the Historic England value system is one of the most common and acknowledged ways of defining the significance of a heritage asset in planning in England.

However, for completeness (and to add further confusion), there is a variance of heritage values which runs parallel to these Historic England values that were introduced by the original National Planning Policy Framework (NPPF) in 2012 (and subsequent amendments). The NPPF since its inception has defined the significance of heritage assets as being made up of heritage values, however instead of adopting Historic England’s values; has labelled their heritage values as archaeological, architectural, artistic and historic values.22 In historic environment determinations and decision making, this variance has created somewhat of a confusion between which value system to apply in planning decision making. Whilst the weight or preference to be applied to either value system has never been tested in a court of law, the NPPF value system and the Historic England Value system are both considered to be material considerations in the determination of a planning application.

Historic England attempted to resolve this issue in a review of their 2008 document which was published for consultation in 2017.23 This document attempted to repurpose the 2008 heritage value system so that it aligned with the NPPF heritage values, however was never officially adopted. Both heritage value systems, despite their differences in terminology set the context in England for what is meant by heritage values for the purpose of the assessment of significance in decision making in England involving development and/or works. Whilst there are values to assess, the values are also subject to the planning determination process. The NPPF for example at Paragraph 212 places ‘great weight’ to a heritage asset’s conservation, however the more ‘important’ the asset is, the greater the weight should be.24

Whilst it is still the case that one needs to be an expert to interpret, analyse and give recommendations for an object’s conservation, maintenance, management and use, values are often subjective and dependant upon how they are understood, valued, explained, and interpreted. The evolution of the value system in recent decades since the Burra Charter has introduced the concept of societal values and looking beyond the physical nature of objects. These value systems relate to external factors and influences on heritage such as economic development, political influences, social justice and civil rights issues, changing governance, digitisation, and environmental degradation, amongst others.25 This change in values brings the discussion of who is the right person or group to make decisions about heritage, and how does society value heritage?

The requirement for consideration of heritage values for decision making in the historic environment comes from the National Planning Policy Framework (NPPF) which at Paragraph 207 seeks 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.’26 This requirement from the NPPF then filters down into the assessment of local policies in an LPA’s Development Plan or Neighbourhood Plan.

The description of significance is presented in a document typically called a Heritage Statement or a Statement of Significance. The importance of the Statement of Significance in a planning application is necessary because it brings together ‘all the reasons why a building or place should be preserved, why it is meaningful or useful, and what aspects require the most protection.’27 The Statement of Significance is a crucial knowledge gathering exercise that not only seeks to meet the requirements of the NPPF and local policy in decision making and taking; but to support planning policy, decisions about design, preservation, conservation, maintenance, tourism, and how society interacts with the historic environment and allows this appreciation for future generations.

Given that the value system is utilised by all sections of the community in England to lodge planning applications, it needs to be capable of being assessed by non-technical experts (eg stakeholders, general public etc) with little or no heritage background. Taking an example, the Aesthetic Value as defined by Historic England will be one of the more common values that the non-technical community can identify with as the value is predominantly derived from the beauty of the physical object in front of the assessor, for example it’s physical appearance. However, whilst some superficial knowledge by an inexperienced viewer might be able to identify a building that is in their mind is beautiful, there is still the need from an aesthetic perspective to understand why a particular building or object is aesthetically pleasing or significant. For example, Brutalist buildings are seen as beautiful to some and ugly to others.

However, can non-heritage practitioners such as a member of the public identify what in the physical nature of a building provides ‘sensory and intellectual stimulation,’ and to what extent this is valuable? Additionally, elements such as a heritage asset’s contribution to art, poetry, story telling or contribution to tourism might have elements of Historic, Communal and Evidential values that are not observable to the assessor.28

The requirement for a Heritage Statement as part of an application would generally fall under the Town and Country Planning (Development Procedure)(England) Order 2015 (DPO 2015), where at Section 7 seeks that in order for a planning application to be valid, it should include ‘any other plans, drawings and information necessary to describe the development which is the subject of the application.’29 Whilst the Heritage Statement is not specifically referred to within the DPO 2015, many LPAs have the submission of a heritage statement mentioned in local validation requirements which is supported by Paragraph 207 of the NPPF. It is however important to note that whilst a Heritage Statement is a requirement to submit where developments or works affect heritage assets, the submission of a Heritage Statement to be valid as part of an application is not a measure of its quality or relevance. Validation is only dependant upon a document called a Heritage Statement being submitted as part of an application. Consequently, not submitting a Heritage Statement would not contravene the national validation requirements under the DPO 2015 and an LPA may still determine an application without a Heritage Statement.

The contents of a properly considered Heritage Statement are required to be proportionate to the application being considered; the more complicated the application, the more complicated the Heritage Statement may be. However, the statement should be no more than to explain the significance of the heritage asset, surrounding heritage assets or its setting. According to Historic England’s guidance on assessing the significance of heritage assets, at the very least a Heritage Statement should contain an analysis of both the tangible and intangible elements which make up the value of the heritage assets, including any elements which may contribute to its setting.30 The process of understanding the significance of a heritage assets needs to be at the very centre of proposing change that would affect a heritage asset. Ideally and as per Historic England’s guidance the assessment of significance is undertaken at the very beginning of the proposal and needs to be able to illustrate how an understanding of significance has influenced the proposal and seeks to do the minimal amount of harm (if any) as possible.31

As described above, the Heritage Statement would normally comprise of the assessment of either Historic England’s or the NPPF’s heritage values. Authors of Heritage Statements may also wish to include photographs, map regression, research from the Historic Environment Record as well as including the list description to assist in demonstrating a holistic view and assessment of the significance of a heritage asset to then commence a conversation around the extent of harm (if any) that could be caused as a result.

To continue adding to the confusion that has already been raised in this research, it is worthwhile noting discussion around list descriptions in decision making with regards to their purpose. List descriptions (or listings) in terms of a listed building or structure in England are categorised as Grade II, Grade II\* and Grade I and relate to the entire inside and outside of a building or structure, not just a façade or what can be seen from a public vantage point. Every listed building has a list description which is a legal requirement so that it can be recognised as a building of national importance in the PLBCA.

Between the years of 1949 until around 2005, the purpose of the list description was to describe the main building for the purposes of identification, so list descriptions explain to the reader what they are looking at rather than what is significant about the particular building or site and do not delve into issues such as setting or curtilage buildings. For the purposes of this research this type of listing will be labelled an ‘old listing.’ From 2005 to current, when devising a new or reviewing an old list description, Historic England now publish a list description that explains the values of the listing which made the heritage asset of enough architectural or historic interest to be listed. What this research will call the ‘new listing’ for the purpose of this research explains why the listing is of architectural and/or historic interest, as well as detailing associated curtilage listed buildings and contributions toward setting that the listing possesses. However, it is important to note the previous discussion around national architectural and historic interest, and significance which whilst similar, are not the same. It is also a consideration that not even a new listing provides a comprehensive explanation of architectural and historic interest as the significance and/or value of an object is not finite and can change over time.

Given the above-mentioned parameters, confusion and background to heritage values, listings and understanding how significance is interpreted in decision making in England, this research will seek to understand a sample of the current state of play with regards to how significance is understood by practitioners and the community by analysing some real-life heritage statement case studies that have been submitted for assessment by the LPA (See Table 1).

# Method

To attempt to understand the state of play, the Case Study approach was chosen as a method for analysis as it has the ability to take a snapshot and ‘close in on real-life situations and test views directly in relation to phenomena as they unfold in practice.’32 Understanding and planning for the historic environment is not derived from experiments under controlled conditions such as in a normative or a phronetic agenda.33 The city and understanding how processes operate within an urban environment is the planner’s laboratory where more valuable learnings can be gained from the empirical and practical experiences that are exhibited through an analysis of case studies.34

In order to get a feeling of the state of play in LPAs, data in the form of publicly available Heritage Statements that accompanied applications for Listed Building Consent were analysed. There are a number of different types of heritage assets so identifying Listed Building Consents increased the probability that a Heritage Statement would be submitted, as this is typically required as part of the validation requirements of an application for Listed Building Consent, albeit not mandatory as explained previously. On the LPA’s website there is the ability to undertake an advanced search of decided planning applications whereby ‘listed building application’ was selected under ‘application type’ and the ‘date of decision’ for the ease of results was undertaken over a year period from 01/04/2023 until 31/03/2024. The search button was then clicked and then five random applications were selected from the results. Once clicking into the application and accessing the submission documents, the Heritage Statements were either a freestanding downloadable document, or was found as part of the Planning Statement.

Using this method of selection, five applications were taken from the following councils: Swindon Borough Council (South West);35 Richmond upon Thames (London);36 Coventry City Council (Midlands);37 Kings Lynn and West Norfolk Council (East of England);38 and Northumberland (North East)39 as shown in Table 1. The selection of councils over a wide geographic region across England is to get a feeling of the state of play where the aim is to learn from the results, rather than to achieve a particular sample size that is representative of a population. It was not the objective of the data to reach data saturation, however useful narrative and trends may result which could aid further research.

The aim that this research consists of is a qualitative form of analysis that is a narrative that seeks to learn and explore meaning, rather than a purely quantitative approach that seeks to compare and analyse data and associated trends to discover the most probable phenomena. To discuss the state of play of Heritage Statement submission, Table 1 shows the results of the 5 councils assessed. The sub-areas of profession of author, heritage values discussed, guidance/policies referred to, and whether setting was discussed are the focuses of this research. This is because of Paragraph 207 of the NPPF seeks that every application concerning a designated heritage asset is required to understand the significance of the asset, and as seen from Historic England’s guidance;40 this is undertaken by understanding the heritage value.

The same paragraph of the NPPF also seeks to understand not just the heritage asset itself but also any contribution made by the asset’s setting, and hence it is an important consideration to understand whether there is an appreciation of ‘setting’ within the heritage statement. The Heritage Value column of Table 1 describes what kind of assessment has been undertaken, and the values mentioned. It is not the purpose of this research to detail whether the assessment of values is holistic or in accordance with Historic England’s guidance or is a true or accurate reflection of heritage value of the asset. The results under this research are only an assessment of which specific values are mentioned, analysed and discussed.

The column ‘Author’s Occupation’ is considered as this will be useful to understand linkages between the understanding of heritage values and significance. This will enable the ability to ask questions as to whether understanding significance is such a technical exercise that currently it is only sufficiently understood by those that are qualified to understand it. Linked to this discussion is the author’s professional association and whether this links to the ability to produce an understanding of the appropriate value systems where a professional association requires a particular level of competence from its members. The recognised association for built heritage practitioners is the Institute of Historic Building Conservation (IHBC) where to be a full member of the institute, members would be expected to have a competent level of knowledge and understanding of significance. It would also be useful to understand how authors that represent other professional bodies in the built environment perform, for example Royal Town Planning Institute (RTPI); Royal Institute of British Architects (RIBA), Chartered Institute of Architectural Technologist (CIAT) and Chartered Institute of Field Archaeologists (CIFA), amongst others.

 The application type is useful for understanding whether there is an influence of scale of the development where the increased size, complication and potentially increased cost of a development is associated with a more detailed and thorough assessment of significance and whether scale is linked to the contracting of advice from a heritage practitioner.

The column Guidance/Policy Referred to relates to the source material which has informed the Heritage Statement. A robust heritage statement will have developed a picture of significance from an assessment of the heritage values either from the NPPF or Historic England or other bodies that publish heritage guidance eg SPAB, IHBC. The assessment of policy and guidance enables an analysis of the influence that guidance and policy has had on the Heritage Statement and whether the author has consulted these as part of the development of the heritage statement. The application reference number is for identification purposes only.

Whilst it is acknowledged in the NPPF and guidance around significance that a heritage statement should be as detailed as the application; at the very minimum each heritage statement needs to make an assessment of significance utilising heritage value which covers both intangible and tangible aspects. The comments column in Table 1 gives further detail on the type of information that is presented within the Heritage Statement. It is felt that undertaking the research this way by identifying specific actors with initially a desk-based approach are important to understanding the foundations of the body of research and will enable a robust discussion of the state of play in these specific examples. This initial research would also underpin any learning that can be gained from this and develop further research such as expanding the body of research to include a sample size that reaches data saturation, analysing the quality of statements and drawing parallels to decision making and understanding experiences from built environment professionals around some of the issues around statements of significance.

It is acknowledged that the Author has an Insider Perspective41 towards this research having been involved with planning and listed building applications for over 20 years and is a qualified and chartered urban planner and heritage practitioner. For this research, it is considered that an insider perspective is advantageous as it enables the author to understand the qualities of a heritage statement and the values and the elements that are required in order to generate robust data and further qualitative meaning to the data. It additionally enables the author to be in a position to understand and make sense of the complexities involved in writing heritage statements and the inherent procedures and methodologies involved.

# Analysis

The commonality in the twenty-five listed building consent applications analysed in Table 1 is that they have the same context; they are all part of Listed Building Consent applications that have been registered by an LPA and aim to meet local validation requirements and paragraph 207 of the NPPF which is applicable to all. There is no variety in how a LPA accepts a Heritage Statement as all LPAs will apply the DPO2015 in the same way to validate and application, no matter where they are in the country.

It was interesting to note that the scale of the development in this sample did not appear to be influenced by the recruitment of a heritage practitioner as it could be assumed that the more difficult or complicated the application, the greater need for expert advice is. This was not shown to be the case, with smaller and less complex schemes such as conservatories and small extensions (23-04390-lbc) having employed a heritage consultant as did larger and more complicated schemes like a pedestrian footbridge (23-2582-lbc).

Given that the acceptance by a LPA of a Heritage Statement for validation purposes is not a determinant as to its quality, the majority of the heritage statements submitted in Table 1 contain no analysis of heritage values, significance or the contribution made by their setting. The most common component of the Heritage Statement across the examples was the list description which the Author used to describe significance and contained no further information beyond the list description. This would highlight that there is a misunderstanding of the purpose of a list description as described previously. In all of the cases in Table 1, these listings were ‘old’ listings which merely described the heritage asset for the purposes of identifying it, not to discuss its significance which would be undertaken by an assessment of heritage value.

When heritage values were mentioned, these were a combination of the NPPF values and the Historic England values with more examples of Historic England’s values being used. In one example (23-01945-LB) it was interesting that King’s Lynn and West Norfolk LPA has a specific Heritage Statement template that applicants can use to accompany their listed building application. The template asks the user filling in the form questions such as providing a summary of the history of the building, and what is significant about the building. The template then asks the user to consult a web link on Historic England’s website which takes the user to the planning advice landing page which has 21 links on various topics from design, local plans, housing and sustainable growth, amongst others. It is no coincidence that the response from the user of the template responded to the significance question with their opinion on the age of the window in question, that in their opinion it was not significant, and that there is no reference to the window in the [old] list description, highlighting points from the previous discussion. There was no reference to the heritage values, of which was present in one of the 21 links.

The discussion within this particular Heritage Statement revolved around the age of the window which was utilised as a determinant to the significance; that the window was not original; was not in view from a public road; and was much thicker than other windows and was therefore not in-keeping. In this case it appeared from the discussion that the author of the template was a private homeowner and had a limited knowledge, qualifications, experience, or awareness of what heritage values or significance was. In this case significance was seen to be purely visual (aesthetic value), with key considerations around the look of the window and its age and perhaps concerningly, that the window was not viewable from the public realm.

The remainder of the Heritage Statements in Table 1 were completed by professions such as historic building consultants, architects, architectural technicians, designers, installers, and engineers. There was no set format of their reports, the reports undertaken by historic building consultants were significantly longer than the other professions and contained information such as map regression, historic summary and then specific discussion of the significance in terms of the heritage value of the asset. The understanding of significance in the form of its heritage value then was able to inform discussion around impact and harm caused by the works. Historic building consultants tended to favour discussion of Historic England’s value system with only two of the historic building consultants utilising the NPPF heritage values.

Architects and Architectural technicians were the most prolific occupations involved with writing heritage statements in this sample and consistently included the list description with the Heritage Statements stopping there, although a small number of cases the Heritage Statement went beyond the listing description with discussion over map regression. The main emphasis in terms of words was dedicated to explaining the reasoning behind the proposal, the design intention and the impact that the author believed would occur. There was no discussion on heritage value or setting and it was not evident that the development itself or the assessment of harm or impact was influenced by a consideration of significance or heritage values. It felt that the heritage considerations derived as an afterthought or ‘tick-box’ exercise to validation with the emphasis placed on what their client wanted first.

There was an instance in one of the Richmond-upon-Thames applications (23-2097-LBC) where heritage values were not discussed, but setting was discussed briefly. However, the discussion was superficial given that there was not sufficient depth in analysis in heritage values which enabled an appreciation of contribution made by setting. The analysis of setting was infrequent and may have been linked to the application itself, where an example from Coventry (PL-2023-0002364-lbc) contained internal works and the author may have felt that these works were of a minor nature (eg Revision of kitchen) and would not affect the setting so there was no need to go into detail in that respect.

There were also heritage statements written by installers who may have been contracted by an owner to install new windows and doors (23-02232-LB), however these also contained no mention of values or setting. It appeared that the main focus of these reports was to discuss what they wanted changed, rather than the reports exhibiting any influence of what the significance had over the proposed alterations or extensions and how they have taken such significance into account when designing their scheme. Statements by installers appeared to be copy and paste templates which were not bespoke to the building and utilised generic statements.

Similarly to an assessment of values, Table 1 shows that there was a correlation between referring to relevant guidance and policy as there was to referring to the heritage values. In the same vein, those who referred to relevant guidance were heritage consultants who discussed Historic England’s Setting Guidance,42 Historic England’s Conservation Principles,43 Historic England’s Assessing Significance Guidance,44 and the NPPF,45 which were amongst the most commonly referred to. In one case (PL-2023-0001610-lbc) an interior designer referred to guidance such as Historic England Conservation Principles and guidance designed to assist in listing buildings, however failed to actually apply the guidance to the scheme being promoted.

# In summary these applications as presented in Table 1 illustrated the following:

* A number of the heritage statements submitted did not contain discussion of heritage values or setting and Historic England guidance around heritage statements was rarely citied.
* When heritage values and setting were discussed, they were defined and explained by heritage consultants as opposed to those without heritage qualifications or chartership did not explain the significance of heritage assets in accordance with the values contained in relevant guidance;
* List descriptions were frequently submitted as part of the heritage statement without an understanding of their purpose;
* The visual aspects of a heritage asset were most frequently discussed with very little coverage of intangible aspects of significance;
* Confusion regarding what to refer to in order to develop a heritage statement via poor direction and excessive links may have been present; and
* It was not evident that heritage significance influenced the development/ works proposed.

# Discussion

***A question of guidance for understanding significance?***

The guidance involving the assessment of significance from heritage values has been around since 2008, and has been refreshed in 2019, and the need for such an assessment has been prevalent since being published in the NPPF initially in 2012 and subsequent iterations, as well as earlier publications such as Planning Policy Guidance and Statements which contained similar requirements in utilising values to understanding significance.

As there is no restriction on the quality of a heritage statement and who can write them in order to be validated, Table 1 showed that there were more heritage statements without an appreciation of the relevant guidance than those that considered the guidance. Given that the guidance has stood the test of time for many years and remains largely unchanged, it would not be unreasonable to form conclusions that professions such as architects and architectural technicians would be well aware and versed of the guidance relating to heritage considerations and the application of it given their technical capabilities when it comes to building design and construction. The majority of the heritage statements written by architects and architectural technicians in these examples did appear to be predominantly focussed upon the design methodology of the proposed works with there being little evidence that the heritage significance of the asset having informed the proposed development/works. This was demonstrated by the lack of reference to relevant guidance such as the English Heritage Conservation Principles, and the Historic England guidance on assessing the significance of heritage assets which should have been the first tools to have been consulted before beginning to design a scheme.

Given this plethora of guidance it is difficult to understand why the heritage statements in Table 1 are of such poor quality in that they do not comply with guidance with many of the statements not containing any discussion on heritage value which then informs the proposed development. Part of the reason may be that the quality of a heritage statement does not correlate as to whether the statement would be accepted by the LPA in order to validate a planning application, or that there is a large amount of confusion present with regards to guidance. A blank piece of paper with Heritage Statement written as a heading has to be legally accepted by an LPA as is a 50 page document containing a robust assessment that is in accordance with the guidance.

However, the plethora of guidance and information overload could be a reason for confusion as demonstrated in the case at Kings Lynn and West Norfolk which asked the author to click on a website that contained over 20 links. Here the use of a template and guidance did not harbour any further discussion on heritage value, significance or setting. It could be said that in this case there was some appreciation of the aesthetic value by the home owner, however limited to what looked similar to the other windows of their property. Had the statement template explored or asked the author of the template to answer questions relating to other values such as historic, evidential or communal, amongst others, there may have been further reasons as to why this window was different. Perhaps the building originally was never symmetrical and had a variance of windows which may have developed as a result of an appreciation of the fashions of the time (evidential, historic)? Whilst the window to be replaced was modern did it replicate a historic form in which it replaced (historic, aesthetic) with there being some reasoning as why this particular difference was present? Such questions are essential to understanding the holistic approach. Perhaps the large amount of guidance is the issue in that one does not know where to go. If such a template/toolkit offered a one stop, easy to use way, then this may have produced a better quality and understanding of significance.

***A question of the legal status of a heritage consultant and the heritage statement***

This next discussion revolves around whether the significance of a heritage asset is best understood by those considered to be experts or the member of the public with the planning system needing to be accessed by persons of all knowledge and abilities. Currently a heritage consultant does not appear to be seen in the same way that a chartered architect is, or an Ecologist even though heritage practitioners require a specific skills sets and achievement of attributes of competence to perform their profession. A potential solution could be to upgrade the specific status of heritage statements in a legal sense as part of the DPO2015 in a similar way that plans are requested as part of the DPO2015. Whilst this would also be relevant for other reports also such as ecology, flood risk etc (as these are also not specifically mentioned in the DPO2015) but to request that applications which seek professional reports, that those reports are undertaken by chartered professionals.

Linked to the above, an interesting finding was that out of four consultants that called themselves a ‘Heritage Consultant,’ only one was a member of the acknowledged professional institute, the IHBC. In this respect the heritage practitioner appeared to be self-identified by the authors that were not IHBC affiliated. A heritage practitioner is not a protected title that is protected the same way whereby only a chartered member of RIBA can call themselves an architect or a chartered member of the RTPI can call themselves a chartered town planner. This highlights a deeper issue as to the role and recognition of the professional institute.

The IHBC do appear to be acknowledging this need with recent moves towards petitioning for chartership.46 Such a change could encourage more heritage practitioners to be recognised members of the institute which could increase knowledge, awareness and use of chartered professionals in order to give advice on the historic environment. It would also likely encourage a level of competency for a professional to call themselves a heritage practitioner. Further understanding of why the public or other built environment professional do not engage heritage consultants would be worth exploring further.

The professional recognition and competence of a Chartered heritage practitioner may also lead to more engagement with the profession as one that is qualified to give such advice. In Table 1, there was no real linkage or explanation provided as to the motivations of clients in engaging or not engaging qualified heritage advice. One would assume that scale and complication may influence engagement of heritage practitioners, however Table 1 did not show any direction in this respect.

***A question of occupation or who is the best to write heritage statements?***

Table 1 illustrates that in these listed building applications, the historic buildings consultant was the most consistent in applying the values and understanding significance which can be attributed to the fact that historic building consultants are the ones qualified to make such determinations and understand the components that make up the significance of a designated heritage asset. This leads to a view that educational aspects of a professional’s experience may be a contributing influence as to the applying of heritage values and the understanding of significance.

The majority of heritage statements written by architects and architectural technicians did not refer to the guidance or discuss heritage values and included the old-style list description as evidence to what significance was. This may illustrate the misunderstanding that list descriptions describe significance where in the majority of cases with all these list descriptions pre-dating 2005, they do not and simply highlight what the asset looks like at the time of listing. Historic England have detailed this clarification of the purpose of list descriptions on their website.47 however this advice does not appear to have been reviewed, understood or demonstrated in the Heritage Statements analysed in Table 1.

For building owners, there may be more of an unfamiliarity at play as they may not have the technical foundations, knowledge or awareness which would justify a discussion around heritage value. Given that the planning system is meant to be accessible to all members of the community from the novice to expert, a template which seeks to enable understanding by property owners with little knowledge of significance is seen as a positive step forward.

# Conclusion

# Whilst heritage assets may be under private or public ownership, the community are only custodians of these assets for the next generation. How listings are cared for, maintained or conserved is therefore crucial and needs to be undertaken with a robust level and knowledge of heritage values which underpin the significance of a heritage asset. Table 1 shows that in this small sample of listed building applications that significance of a heritage asset is not being properly understood and communicated through listed building applications. It is appreciated that the results in Table 1 are small but similar results are reflected in each of the five LPAs that were surveyed where a similar narrative is being exhibited. It would be worthwhile analysing further councils and heritage statements geographically across the country to the point of data saturation to see whether this narrative is repeated.

# There are different influences as highlighted within this research which stem from the variety of actors involved with the submission of listed building applications which revolve around education, access, understanding and awareness of information, as well as the legal status when it comes to the heritage practitioner and the validation procedure for planning applications. Whilst there is a plethora of guidance available to assist applicants to understand the heritage values no matter what their knowledge in the historic environment is; the only occupations that appear to be utilising or understanding the importance of these guidance notes are persons qualified/experienced in historic building conservation. Given that the planning application process is open to everyone, there is a need to understand what are the barriers that are preventing further discussion and understanding of heritage value and significance or the recognition that heritage consultants are an occupation and profession in their own right. In this very small sample it appeared that there was confusion around what to write in heritage statements and information in templates offered to homeowners, information overload when accessing websites; and issues with using guidance with many submissions focussing on the product they want rather than how significance has influenced the proposal.

# One observation that was common throughout the research was that the concept of submitting a heritage statement was seen as something that must be done and in the majority of cases something called a heritage statement was submitted. This illustrates that applicants are aware of what they should do in order to validate an application, however results showed that quality and understanding of heritage value was absent. The purpose of a heritage statement is to form an understanding of significance, influence and provide justification for why something is being developed in the way it is.

# Whilst there are concerns around the level of knowledge and understanding, this research discusses the legislative aspect where the quality or coverage of heritage values is not part of validation requirements. If the DPO2015 dictated that a heritage statement must contain an assessment of heritage values and setting and that a LPA could not validate an application unless this was present; would this change the quality of the heritage statement which would influence an understanding of the significance has upon a heritage asset?

In addition to legislation and the general problems associated with the understanding and accessibility of guidance and the enforcement of legislation, does the issue go deeper and extend into education and teaching of built environment professionals into what heritage is and how to value it properly? Linked to this, is there a need for owners of listed buildings to be better educated as to what is significant about their building?

Additionally, the research just focussed on England, and it should not be assumed that these types of narratives would only be isolated to the planning system in England. Given that there is a broad agreement between members of ICOMOS as to the principles involved in caring for the historic environment, there is a need to audit current planning systems and understand whether heritage value systems could be made easier to use and understand on a global stage given that the philosophy and many aspects in historic environment conservation are similar.

It appears that there are a number of ways that are worth examining in order to find a way of better understanding heritage and the further research section below illustrates some of the ways that could enable greater research and discussion regarding how the historic environment is managed, cared for and passed down to future generations.

# Further Research

This initial research is just the beginning, but highlights a wealth of research projects that can stem from this analysis such as:

The small body of data collected began to demonstrate that there are some common narratives and actors in the understanding of heritage significance. It would be useful to expand and analyse the sample geographically further across the country in order to understand the point of data saturation and whether there are trends and narratives that can be explained;

Linked to the above, it would be also worth exploring whether other countries are experiencing similar issues and whether there are any lessons learnt as a result;

The research identified that built environment professionals were having difficulties in understanding and writing statements of significance that illustrated a holistic understanding of heritage value. It would be worth interviewing council staff and private sector built environment professionals to understand the current issues involved in understanding and describing significance;

Linked to the above findings around built environment professionals, it would be useful to understand whether there could be improvements to understanding significance through the pedagogical aspect to teaching built environment professionals through university study of teaching significance and understanding the experiences of learners which may influence future professionals;

This research highlighted the complexities involved in attempting to interpret and understand the various guidance notes and information available. It would be crucial to test ways of enabling better understanding of significance for different levels of knowledge, such as through the use of an easy-to-use one stop significance toolkit;

It would be worth understanding how and when heritage consultants are engaged in providing advice for alterations to the historic environment and whether there are any barriers to understanding the importance of proper qualified advice which may be linked further to the recognition of the profession itself.

Linked to the above, whilst this research does not look at the quality of the heritage statement or its resultant influence on the decision making process, eg does a better quality understanding of significance generate more approvals within the planning process.

**Biography**

John Somers is a Senior Lecturer in urban planning and the historic environment at the University of Westminster in the School of Architecture and Cities. His research interests involve retrofitting historic buildings, heritage at risk, assessing heritage significance, and investigating inequality as a result of legislation and the resultant design of the built environment.

Table 1. Assessment of heritage statements submitted to five local planning authorities Sources: Coventry City Council; London Borough of Richmond upon Thames; Borough Council of Kings Lynn and West Norfolk; Northumberland Council; Swindon Council.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Application No** | **Heritage Statement Author’s profession/ professional body (if indicated)** | **Description of Works** | **Heritage Values discussed (eg Historic, Evidential, Aesthetic, Communal, spiritual, Archaeological etc)** | **Setting Discussed** | **Guidance/ Policy referred to** |
| **Coventry City Council** |  |
| PL-2023-0000178-lbc | Historic building Consultant/ None | Conversion to residential Flats | Evidential (archaeological), Historic, Aesthetic, Communal values discussed. | Yes | Conservation Area appraisal, NPPF, PLBCA, Local Plan, British Standard, HE Setting guidance; HE 2008 guidance |
| PL-2023-0001610-lbc | Interior Designer/ None | Removal entrance porch, new timber framed structure | Whilst the heritage values are defined (copy of NPPF and guidance) they are not assessed. Only ‘old style’ list description is included. | No | NPPF, HE2008, DDCM2018 |
| PL-2023-0002364-lbc | Architect/ RIBA | Revision to Kitchen | No heritage values discussed, only ‘old style’ list description is included | No | None |
| PL-2023-0002589-lbc | Historic building Consultant/ None | Changes to external cladding | Whilst not categorised into the heritage values, it is evident that the values are discussed. | Yes | NPPF |
| PL/2023/0000885/LBC | Architect/ RIBA | New shop frontage | No heritage values discussed, only ‘old style’ list description is included. | No | None |
| **Borough Council of Kings Lynn and West Norfolk** |  |
| 23-01876-lb | Architect/ RIBA | Alterations to roof pitches | No heritage values discussed, only ‘old style’ list description is included. | No | None |
| 23-01945-LB | Home owner/ None | Replacement window | Utilises the Council’s Heritage Statement template, however no mention of heritage values | No | None |
| 23-02194-LB | Architectural Technician/ CIAT | Solar panels | No heritage values discussed, only ‘old style’ list description is included. | No | None |
| 23-02232-LB | Engineer/ CEng | Replacement windows and doors, internal alterations | No heritage values discussed, only ‘old style’ list description is included. | No | None |
| 23-02292-lb | Architectural Technician/ None | Extensions and alterations | No heritage values discussed, only ‘old style’ list description is included. | No | None |
| **Northumberland Council** |  |
| 23-04271-lbc | Architect/ RIBA | Installation of a flue | No heritage values discussed, only ‘old style’ list description is included. | No | None |
| 23-04390-lbc | Historic building Consultant/ None | Replacement conservatory | Archaeological, Historic, Architectural, Historic interest are discussed. | Yes | NPPF, Local Plan, HE2008, HE2015; HE 2016, HE2017 |
| 24-00014-lbc | Architect/ RIBA | Insertion of window | No heritage values discussed, only ‘old style’ list description is included. | No | None |
| 24-00412-lbc | Windows and Door installer/ None | Renovation of existing windows | No heritage values discussed, only ‘old style’ list description is included. | No | None |
| 24-04486-lbc | Home improvement company/ None | Renovation of existing windows | No heritage values discussed, only ‘old style’ list description is included. | No | None |
| **London Borough of Richmond upon Thames** |  |
| 23-2097-LBC | Architect/ RIBA | Single storey outbuilding and modification of wall | Some map regression, mentioning of setting, mention of the term ‘heritage value’ which is given low, but unclear how this has been derived given no discussion on the individual values. Conservation Area mentioned | Yes | Conservation Area appraisal |
| 23-2452-lbc | Historic building Consultant/ CIFA | Alterations to rear bathroom | Aesthetic, historic, illustrative and associative values discussed | Yes | PLBCA, NPPF, CIA2014, HE2008, HE2015, HE2018 |
| 23-2582-lbc | Historic building Consultant/ None | Alterations to footbridge | Aesthetic value, historic value, communal value discussed. Surrounding assets also assessed. | Yes | LondoN Plan, Local Plan, NPPF, HE2017, HE2019, Local Plan, NPPF, NPPG |
| 24-0320-lbc | Historic building Consultant/ IHBC | Rear extension | Aesthetic value, historic value, communal value discussed. Surrounding assets also assessed. | Yes | NPPF, NPPG, HE2017, HE2008, |
|  24/0371/LBC | N/a | Render of brick wall | No heritage statement submitted | No | None |
| **Swindon Borough Council** |  |
| s-lbc-23-0693 | Retail designers/ None | Changing places facility | No heritage values discussed | No | None |
| S-lbc-23-0796 | Building owner/ None | Replacement timber windows | No heritage values discussed | No | None |
| s-lbc-23-1046 | Historic building Consultant/ IHBC, RTPI | Internal/external alterations | archaeological, architectural, artistic and historic interest discussed | No | NPPF, HE2019 |
| s-lbc-23-1148 | Architect/ RIBA | Replacement stone tiles with slate | No heritage values discussed, mentions surrounding buildings but no assessment of setting. | No | None |
| s-lbc-23-1534 | Architect/ RIBA | Conversion to HMO | No heritage values discussed, only ‘old style’ list description is included. | No | NPPF, Local Plan, Conservation Area Statement |