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The Guidance Team,
Historic England,
Cannon Bridge House,
25 Dowgate Hill,
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EC4R 2YA

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Dear Sirs,

Statements of Heritage Significance

The Society welcomes the opportunity to comment on the new draft advice note on Statements of Heritage Significance. In general, we appreciate that the advice is aimed towards Planning Authorities and owners or developers who need to provide statements of heritage significance and follows up on the 2015 advice on Managing Significance. The document helpfully links the specific requirements of the NPPF and the NPPG (and other normative documents) to the process of preparing, and the scope of, Statements of Heritage Significance and Design and Access Statements. We have no substantive comments, therefore, on policy issues set out in the note, but we do have some comments on how the guidance can be read and used:

Para 1: For clarity, para 1 should say 'on the significance of heritage assets affected' rather than 'heritage significance'

Para 5: This area of the advice note needs some strengthening, in particular to address the problem of Heritage Statements which (despite the warning in this paragraph) can easily become advocacy documents. There is a broad spectrum of legitimate professional opinion in value judgements, particularly in matters like the contribution of setting to significance, and it is therefore not easy to know that what is produced is a dispassionate assessment. Applicants will inevitably choose a practitioner whose values reflect their own, or whose conclusions about significance chime most readily with what the applicants wish to do (for example from the small group of apologists for tall buildings in London). Local authorities representing the public interest need the specialist expertise, but do not always have it readily available, to be able to critique and challenge applicants' assessments, where necessary to try to achieve a mutually acceptable assessment.

Para 6: This in consequence also needs to be stronger, starting with something like: 'The purpose of understanding the asset and its significance is to inform and help to shape the design process. If this does not happen before planning applications are made, any retrospective assessments are inevitably advocacy documents which seek to justify decisions



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and actions already taken, which may be at odds with the significance of the heritage asset itself, and give no opportunity for the significance of the asset to be fully considered in advance of works to it which may affect its significance.'

Para 11: It would be helpful here to tie this advice back to Para 5, and to stress that the planning authorities require a dispassionate assessment rather than an advocacy document. This, too, might be the place to reiterate that in the public interest, it is for local authorities, if necessary, to challenge assessments, and therefore potentially modify the design approach. The final sentence, which feels like a simplistic method of dealing with this issue, needs either explanation by reference to other guidance or (perhaps preferably) omission

Para 20: The wording between subheading A and B is unfortunate ('Once the heritage asset...as the first stage of the process. '), since it implies that the applicant's view of significance is the definitive one, rather than the starting point for engagement with the LPA.

Yours faithfully,

John Lewis FSA, General Secretary