

**BRIEF FOR A STATEMENT OF HERITAGE SIGNIFICANCE
AND IMPACT ASSESSMENT (INCLUDING WHERE
APPROPRIATE AN ARCHAEOLOGICAL DESK BASED
ASSESSMENT AND WALK OVER SURVEY)**

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BEDFORD BOROUGH COUNCIL

**HISTORIC ENVIRONMENT
PLANNING SERVICES**

Contents

1. [Summary](#)
2. [Advice on commissioning an assessment](#)
3. [Definition of a statement of heritage significance \(or a DBA\) and impact assessment](#)
4. [Definition of a Desk-based assessment](#)
5. [Requirement for a statement of heritage significance and impact assessment \(and archaeological desk-based assessment and evaluation, where appropriate\)](#)
6. [Further guidance](#)
7. [Local sources](#)
8. [Assessment objectives](#)
9. [Submission of assessment report and archiving](#)

1. Summary

This is a generic brief for a statement of heritage significance and impact assessment, to be undertaken prior to the determination of a planning or listed building consent application. This may be a standalone assessment or incorporated into a design and access statement. In turn, a statement of heritage significance and impact assessment may also incorporate or be accompanied by an archaeological desk-based assessment and walkover survey, and so these too are covered by this brief under the catch-all term 'assessment'.

Assessments will be required where a proposed development, or demolition, extension or alterations to an existing building, or change of use to land or building, is likely to affect the significance of one or more known heritage assets of archaeological, architectural, artistic or historic interest or there is the potential for, as yet, undiscovered assets of archaeological interest to be affected. The significance of a heritage asset may be affected by direct physical change or through changes to its setting.

In line with the National Planning Policy Framework, these assessments will be used by the Local Planning Authority to help them understand the interest or potential interest of the heritage assets likely to be affected and how this interest may be impacted if the proposal is carried out. Ultimately, the information contained within an assessment will be considered as part of the decision-making process for an application, so it is advisable for assessments to be undertaken by appropriately qualified and experienced organisations or individuals.

This brief sets out the generic requirements for the heritage/archaeological consultant(s) who will undertake the assessment (or other organisation/individual for the most simple of applications only) and can also be used to obtain quotes (the consultants will also need details of the proposals). It is suitable for proposals that may have multiple effects on designated heritage assets such as listed buildings, conservation areas, registered parks and gardens and scheduled monuments and their settings, and non-designated heritage assets including buildings of local interest, historic landscapes, archaeological remains and their settings. *For simple, less complex cases (e.g. for simple changes affecting a single heritage asset) where the applicant or their agent intends to produce the statement of significance and heritage impact assessment, the *Heritage Statement Guidance and Template* for guidance should be referred to.

An assessment will normally include: 1) the key issues it has sought to address; 2) the expertise/specialist input to the assessment and the sources and methodology employed; 2) research from a range of publicly available sources and information held by the applicant; 3) a site visit with appropriate written/photographic record; and 4) the production of a final report to include an assessment of the significance of each asset likely to be affected, how this significance may be impacted by the carrying out of the works proposed, how the impact can be avoided, minimised or mitigated or its justification where that is not possible, and where appropriate, the potential for as yet undiscovered assets of archaeological interest to be affected.

A key issue at the outset will be to identify the nature of the heritage assets and interests likely to be affected and to ensure the assessment focuses on matters relevant to the impact of the proposals on those assets. Advice should have been sought in the first instance (through the submission of a pre-application planning enquiry) from Bedford Borough Council's Conservation and Archaeology Officers as to

the need for a full assessment and the key issues to be addressed, although such advice should not be taken as exhaustive as the study itself may identify additional issues to be considered. In some cases, the Council might advise that an area's known or potential archaeological interest will be best assessed by moving directly to intrusive archaeological evaluation (e.g. geophysical survey and/or trial trenching).

2. Advice on commissioning an assessment

***This advice is for information only. The Council takes no responsibility for the operations of independent organisations or individuals.**

Assessments should normally be carried out in accordance with this brief by appropriately qualified and experienced organisations or individuals. In some cases, a short assessment by the applicant or their agent may be acceptable where proposals are for minor or straightforward changes (e.g. changes to a boundary treatment in a conservation area). In those cases, please refer to the [guidance and suggested template](#). However, as a Heritage Statement forms an important part of an application, it is normally in the best interests of the applicant/agent to employ a suitably qualified individual. It is also advisable for the assessment to be undertaken before the design of the proposals is "set in stone", so to inform the design and avoid harmful impacts to heritage assets where possible; the LPA is required to take into account the impact of a proposal upon a heritage asset's significance, whether harmful, neutral or beneficial, as part of its consideration of an application.

This brief includes reference to various published Standards and Guidelines issued by the Chartered Institute for Archaeologists (CIfA) and Historic England guidance which set the benchmarks for work of a professional standard. The Council does not maintain a list of 'approved' heritage consultants/archaeological contractors who they have assessed as meeting the benchmarks but does recommend that assessments of heritage assets of primarily archaeological interest be undertaken by:

- a CIfA Registered Organisation (RO) – these are heritage organisations benchmarked by the chartered institute. A list is available from: <https://www.archaeologists.net/civicism-contact-distance-search>.
- under the direct management of a Member of the Chartered Institute for Archaeologists (MCIfA)

For heritage assets of primarily architectural interest:

- HESPR businesses that work to conservation and service standards expected by the Institute for Historic Building Conservation (IHBC) <https://www.ihbc.org.uk/hespr/>
- IHBC Accredited Practitioners <https://www.ihbc.org.uk/accredited/> or
- a CIfA Registered Organisation (RO) employing built heritage specialists <https://www.archaeologists.net/civicism-contact-distance-search>

And for multiple heritage assets including those of architectural, archaeological, historic and artistic interest:

- a team or individual with the range of appropriate qualifications and expertise for the asset types affected. *Please note that some members of IHBC and

ClfA will have accreditation and expertise in more than one area e.g. historic buildings and archaeology

When commissioning an assessment, make sure that the organisation or individual to be used:

- has the necessary experience and understanding to meet the brief. This includes those aspects relating to the assessment of an asset's significance and impacts of the proposal upon this significance, site walkovers, and reporting
- can provide personnel (directly employed and/or subcontractors) with the appropriate skills, qualifications, and ClfA and/or IHBC membership grades or equivalent experience for the task
- can meet the required timetable, and has a suitable infrastructure and track record of undertaking work of a similar nature and scale

3. Definition of a statement of heritage significance and impact assessment

“Analysis of significance, in a statement of heritage significance, is related to wider descriptions of significance and impact, often called Heritage Statements, Heritage Impact Statements, and Heritage Assessments. All of these go further than statements of heritage significance by detailing the impact of a proposal on significance, how it can be avoided, minimised or mitigated, and its justification, if that is not possible, in whole or in part. Statements of heritage significance are an essential component of such statements and may form the first section where the staged approach is taken ”. (Historic England, 2019)

4. Definition of a Desk-based assessment

“Desk-based assessment is a programme of study of the historic environment within a specified area or site on land, the inter-tidal zone or underwater that addresses agreed research and/or conservation objectives. It consists of an analysis of existing written, graphic, photographic and electronic information in order to identify the likely heritage assets, their interests and significance and the character of the study area, including appropriate consideration of the settings of heritage assets and, in England, the nature, extent and quality of the known or potential archaeological, historic, architectural and artistic interest. Significance is to be judged in a local, regional, national or international context as appropriate”. (ClfA, 2014)

5. Requirement for an Assessment (incl. archaeological desk-based assessment and evaluation, where appropriate)

Paragraph 194 of the National Planning Policy Framework (MHCLG, 2021) and Bedford Borough Local Plan 2030 policy 41s set-out that where heritage assets might be affected, that the applicant is required 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. Whilst the assessment need only be proportionate to the significance, merely quoting the list description for a heritage asset on the national list is unlikely to be acceptable, as list descriptions are intended for identification of the asset only and whilst recent listings

can include some detail of significant elements of an asset, they are not exhaustive. Many older list descriptions do not include any assessment of significance.

As a minimum for all Statements, the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Some Conservation Areas have Appraisals and Management Plans and any works within a Conservation Area or forming part of its setting, must reference the relevant appraisal and plan (a list of Conservation Areas, Appraisals and Plans, can be found at: <https://www.bedford.gov.uk/planning-and-building/historic-environment/historic-areas-and-buildings/>). Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, applicants should submit an appropriate desk-based assessment and, where necessary, the results of a field evaluation to establish the significance of the assets likely to be affected and the degree of impact. The results of the DBA and evaluation could be incorporated within the statement of heritage significance part of the assessment or submitted as standalone documents alongside it, with an impact assessment setting out how archaeological heritage assets will be impacted by the proposal, how the impact can be avoided, minimised or mitigated or its justification where that is not possible.

So, where it is considered that any of the following heritage assets might be affected by the proposal, either directly or by changes to their setting, an assessment will be required: listed building, conservation area, registered park and garden, scheduled monument, building of local interest, historic landscapes, archaeological sites recorded on the Historic Environment Record and previously unknown ('potential') archaeological sites.

6. Further guidance

Historic England's publications, "Statements of Heritage Significance: Analysing Significance in Heritage Assets" (2019), "Managing Significance in Decision-Taking in the Historic Environment" (2015), "Conservation Principles, Policies and Guidance" (2008), and "The Setting of Heritage Assets" (2017), and The Chartered Institute of Archaeologist's "Standard and guidance for historic environment desk-based assessment" (2017), provide further useful guidance on assessing the significance of heritage assets and impacts upon them.

For historic buildings, the Historic England advice note "Understanding Buildings: A Guide to Good Recording Practice" (2016) provides advice for how to secure an understanding of the history of a building where conservation, repair or alteration is proposed. Historic England also has an extensive range of guidance available for specific classes of archaeological sites and monuments, "Introductions to Heritage Assets (Archaeology): ..." and Selection Guides for listed buildings, archaeological sites and historic parks and gardens.

Historic England guidance is available online at <https://historicengland.org.uk/advice/find/a-z-publications/>, <https://historicengland.org.uk/listing/selection-criteria/scheduling-selection/ihas-archaeology/> and <https://historicengland.org.uk/listing/selection-criteria/listing-selection/>

CIfA's guidance is at <https://www.archaeologists.net/codes/cifa>

For places of worship, Historic England has also produced a Place of Worship Statement of Significance Creator - a free-to-use tool that helps people who look after places of worship construct Statements of Significance. This is available online at <https://www.statementsofsignificance.org.uk/>

7. Local sources

Sources available locally that may aid an understanding of the significance of a particular heritage asset or assets include relevant historical documentation which can play an important role in establishing historic interest. Documentation is often attainable from the landowner, Bedfordshire Archives and Records Service (<http://bedsarchives.bedford.gov.uk/ArchivesAndRecordOffice.aspx>), the Historic Environment Record (<https://www.bedford.gov.uk/planning-and-building/historic-environment/historic-environment-record/>), Bedford Architectural Archaeological & Local History Society and Bedfordshire Archaeological Council Publications (<http://www.baalhs.org.uk/>) and the Historic England archives (<https://historicengland.org.uk/images-books/archive/>). Sources may include historic maps, estate maps and surveys, rating valuations, sales catalogues, architect's drawings, prints, photographs, accounts and letters. Both <https://www.oldmapsonline.org/> and <https://maps.nls.uk/geo/explore/side-by-side> are also good sources for historic mapping.

Both Bedfordshire and the East of England have their own archaeological research frameworks, "Research and Archaeology: Resource Assessment, Research Agenda and Strategy" (2007), and "Research and Archaeology (1997, 2011 and 2011)", respectively, which can aid analysis of the significance of a heritage asset of archaeological, historic or architectural interest, available at http://www.archaeologyuk.org/cbas/index.htm_files/Bedfordshire%20Arch%20Frameworks.pdf and <http://eaareports.org.uk/algao-east/regional-research-framework/>. Conservation area appraisals and management plans, the Pevsner Architectural Guide to Bedfordshire, Huntingdonshire and Peterborough (2015) and Victoria County History for Bedfordshire can similarly aid an initial assessment of the architectural interest of a built asset, its setting and historic context. Those conservation area appraisals and plans completed for the borough are available at <https://www.bedford.gov.uk/planning-and-building/historic-environment/historic-areas-and-buildings/>. VCH is at <https://www.british-history.ac.uk/search/series/vch--beds>

Information on the archaeology, main archaeological components, historic buildings and townscape of Bedford and Harrold, can be found within their Extensive Urban Surveys at https://archaeologydataservice.ac.uk/archives/view/bedsluton_eus_2006/overview.cfm

Information on historic landscapes can be found in the Bedford Borough Landscape Character Assessment, including topography, geology, landscape history, the character of past land use and the survival of significant features, such as routeways, boundary features, deliberately planted vegetation etc. <https://www.bedford.gov.uk/planning-and-building/planning-policy-its-purpose/technical-reports/> The results of the Bedford Borough National Mapping Programme which has mapped the form and extent of all subsurface archaeological sites revealed as cropmarks on aerial photos, and all archaeological remains seen as earthworks, structures and buildings, is also useful for studying the evolution of historic landscapes; this is available from the historic environment record, as is specific information on non-designated parks and gardens.

The adopted Bedford Borough Local Plan 2030 at <https://www.bedford.gov.uk/planning-and-building/planning-policy-its-purpose/local-plan/> and neighbourhood plans at <https://www.bedford.gov.uk/planning-and-building/planning-policy-its-purpose/neighbourhood-planning/> may also contain information, evidence bases and policy for a variety of heritage assets.

8. Assessment objectives and methodology

The assessment should be proportionate to the proposal and achieve an analysis of the significance of all heritage assets (visible or below-ground) likely to be affected, how this significance may be affected, and the options for avoiding, minimising, or mitigating any negative impacts and enhancing or better revealing significance where possible. It should also, where appropriate, include an historical understanding of the heritage asset to be affected to inform the layout and design of new development.

As part of the Statement of Heritage Significance section of the assessment, the assessment procedure should:

a) identify all designated and undesignated heritage assets likely to be affected by the proposal through changes to their physical fabric and/or setting. To include: scheduled monuments, listed buildings, registered historic parks and gardens, conservation areas, buildings of local interest, historically "important" hedgerows, archaeological sites recorded on the Historic Environment Record and previously unknown ('potential') sites;

The Bedford Borough Historic Environment Record (<https://www.bedford.gov.uk/planning-and-building/historic-environment/historic-environment-record/>) contains information for all such known heritage assets within the borough (with the exception of "important" hedgerows) and the National Heritage List for England contains the list descriptions for all designated heritage assets (the historic environment record in many cases, also holds additional information for these): <https://historicengland.org.uk/listing/the-list/>

b) once all known heritage assets have been identified and where appropriate, also look to identify the potential for previously unidentified archaeological remains that might be affected by the proposal;

This examination of potential might take the end form of a standalone archaeological desk based assessment or its results might be incorporated directly into the statement of significance. It will normally seek to summarise the documented archaeology of the study area, including the history of previous archaeological research (held by the Historic Environment Record), and gauge the potential for the presence of previously unrecorded archaeological remains. Where necessary the results of a separate archaeological evaluation may be required to confirm the presence, extent, condition and likely significance of archaeological remains. ClfA provides Standards and Guidance for both desk-based assessments and archaeological evaluations: <https://www.archaeologists.net/codes/cifa>

c) identify the archaeological, architectural, artistic and historic interest of all known or 'potential' heritage assets likely to be affected by the proposal and describe their significance, including any contribution made by their setting, to meet the requirements of paragraph 194 of the NPPF and Local Plan policy

41s. 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.

The Historic England guidance listed in Section 6 (2015 and 2019) above sets out the key steps in detail for understanding the nature ('interest') and significance of a heritage asset, the extent of that significance, and the level of significance, as follows (in brief):

(i) examining the asset and its setting;

(ii) checking the local and neighbourhood plans for relevant evidence bases and policies, the Historic Environment Record, the National Heritage List for designated heritage assets, Heritage Gateway (although please note this lacks the live data and detail of the HER and should not be considered a substitute), Historic England archive and other relevant locally available sources listed in section 7;

(iii) consider whether the nature ('interest') or the significance of the affected assets require an expert assessment to gain the necessary level of understanding. For example, a building may require physical intervention such as the selected removal of non-historic plaster, to reveal important details hidden behind later additions and alterations, bearing in mind that such investigations should be proportionate to the significance. Most evaluation of significance in buildings is likely to be based on a mixture of documentary research and non-intrusive examination of fabric (as per (i) and (ii) above, but where the significance lies below-ground (archaeological) or more deeply concealed in a building's fabric, a greater level of intrusive investigation may be required. Similarly, where the archaeological nature ('interest') and the significance of a heritage asset needs to be better understood, this may require an archaeological evaluation to be undertaken (typically geophysical survey and/or trial-trenching). An evaluation must go beyond simply identifying the presence or absence of archaeological remains and seek to characterize the nature, extent and significance of the remains.

The assessment procedure should as part of the Statement of Heritage Impact section of the assessment, specifically:

d) assess the potential effects of the proposal upon the significance of all heritage assets likely to be affected so to inform options to avoid, minimise or mitigate harm to this significance and to enhance or better reveal it where possible, and to aid the informed application of relevant legislation (Planning (Listed Buildings and Conservation Areas) Act (1990) and the Ancient Monuments and Archaeological Areas Act (1979)), national policy (NPPF paragraphs 195 to 208) and local plan policy (41s) in planning or listed building consent decisions.

The Historic England guidance listed in Section 6 above sets out in detail the key steps to assessing a proposal's impacts upon the significance of a heritage asset and for demonstrating how such impacts can be avoided, minimised or mitigated, as follows (in brief):

(i) Where the proposal affects the historic or archaeological fabric of a heritage asset or assets, specify the effects including loss or concealment of fabric or

features which contribute to significance, and the impact of alterations, extensions, all groundworks etc. In some cases, condition and structural surveys or the results of an archaeological evaluation may usefully be quoted, to explain why a particular course has been chosen;

(ii) Where a proposal affects the setting, and related views, of a heritage asset, or assets, clarify the contribution of the setting to the significance of the asset, or the way that the setting allows the significance to be appreciated. This may include the impact of the location of new development within the setting, of the impact on key views, the impact on the relationship of the heritage asset to its setting, etc.;

(iii) Where the proposal impacts both on the heritage asset directly and on its setting, a cumulative assessment of impact will be needed. Impacts both harmful and beneficial should be noted;

(iv) Show how the impact is to be avoided or minimised, for instance by the proposal being reversible;

(vi) Show how in some circumstances, the ability to appreciate significance may be enhanced or otherwise revealed by the proposal;

(vii) Where relevant, show how an historical understanding of the heritage asset to be affected has informed the layout and design of new development;

viii) Describe the justification for the proposal and any impacts upon the significance of heritage assets affected and where there would be an impact on the significance of the heritage asset, detail any further archaeological analysis and recording proposed.

9. Submission of reports and archiving

Historic England's publication, "Statements of Heritage Significance: Analysing Significance in Heritage Assets" (2019) suggests a report structure (Section 3) which may be useful for those undertaking assessments to follow.

One pdf. copy of the completed assessment should be supplied to the local planning authority and a further copy directly to the Historic Environment Record (mail: archaeology@bedford.gov.uk)

Assessments submitted in support of planning applications are automatically considered to be public documents and will be made available for public consultation online and through the Historic Environment Record. Other reports will also be treated as a public document unless specifically identified as being confidential. Where a report is so identified then confidentiality should apply for an agreed period not normally exceeding 12 months from its submission to the HER.

The paper archive generated by the assessment should be integrated with the archive of any subsequent archaeological or building fieldwork.

The assessment's comments on heritage interest and significance, impacts upon this significance and recommendations will not be binding on the LPA or its advisers.