



Historic England

# The Heritage Dimension of Planning Applications



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This research was undertaken by Marwa Ahmed, building on a pilot study by Guy Robinson.

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<https://www.historicengland.org.uk/advice/planning/consents/>

Front cover: Grade II Listed St Mary and St Joseph Catholic Church, Tower Hamlets, surrounded by the Landsbury Estate Poplar, and with the central London skyline beyond.

## Summary

This research project reviewed just under a thousand planning and listed building consent applications, decided in specified periods during April and September 2016 from nine local planning authorities (three ‘urban’, three ‘rural’, and three ‘mixed’ urban and rural authorities; and each representing one of the nine Historic England regions). The final sample comprised 861 planning applications and 93 listed building consent applications. Relevant data was then recorded in a spreadsheet designed to answer a set of questions on the ‘heritage dimension’ of planning applications; specifically, the frequency with which heritage assets feature in planning applications, how they feature, and what impact the ‘heritage dimension’ has on the processing and determination of planning and listed building consent applications. For the purposes of this study, ‘heritage dimension’ was defined as where a heritage asset, designated or non-designated (such as locally listed assets or formally-defined archaeological protection areas), was directly under consideration as part of the application (setting-only considerations were not included in this definition).

## Key Findings

Based on the data from the applications reviewed, just over a quarter of planning applications had a ‘heritage dimension’, and where heritage was a factor in the application it did not appear to have a notably negative impact on the application process or outcomes. It is also clear that the planning applications submitted were mostly householder alterations and extensions undertaken by private individuals; and most listed building consents were for private individuals proposing alterations to their listed home or, to a lesser extent, commercial applicants proposing alterations to their business. Some of the key findings from the data are briefly outlined below. A full analysis of the results, and discussion of all the findings in greater detail, is provided in the report.

Planning Applications	Listed Building Consent Applications
26% of planning applications had a heritage dimension.	
<b>The Decision-Making Process</b>	
Outcome	
91% of applications with a heritage dimension were granted planning permission.	Permission was granted for 92% of listed building consent applications.
Determination time	
77% of applications with a heritage dimension were determined on time.	84% of listed building consent applications were determined on time.
Related Applications	
20% of planning applications with a heritage dimension had a related listed building consent application which was submitted, processed and decided concurrently.	Almost half (47%) of the listed building consent applications submitted had a related planning application that was submitted, processed and decided simultaneously.
<b>The ‘Heritage Dimension’</b>	
Conservation Areas were the most common heritage asset for consideration in planning applications.	83% of listed building consents were for a Grade II listed building, 11% were for a Grade II* listed building and 6% were for a Grade I listed building.

In 23% of applications with a heritage dimension (6% of all planning applications in the sample), there was more than one heritage asset under consideration.	
<b>Planning Applications</b>	<b>Listed Building Consent Applications</b>
<b>The 'Heritage Dimension'</b>	
Non-designated Assets	
Locally defined archaeological protection zones accounted for 92% of non-designated assets encountered in the planning applications sampled.	
<b>Works proposed</b>	
The majority of planning applications made (84%) were for construction works, and more specifically for the alteration or extension of a property (67%).	'Internal: other' (47% of applications) and 'doors and windows' (43% of applications) were the most common types of work proposed in listed building consent applications.
<b>Application Details</b>	
Use of an Agent	
79% of planning applications overall, or 81% of applications with a heritage dimension, used an agent.	An agent was used in 76% of listed building consent applications.
Pre-Application Advice	
There is evidence to suggest that pre-application advice was sought in 38% of planning applications with a heritage dimension, compared to 30% of planning applications overall.	Pre-application advice was sought in just over half (51%) of LBC applications.
Residential changes	
19% of planning applications with a heritage dimension proposed a residential gain, compared with 13% of applications overall. Of the 42 applications with a heritage dimension that proposed a residential gain, 38 (90%) were granted planning permission. Few applications (1%) proposed a residential loss.	
<b>Statements on Heritage</b>	
Less than half the planning applications with a heritage dimension included a statement on heritage.	95% of listed building consent applications included a statement on heritage.
Author	
'Heritage statements' were most commonly written by an agent (63% of 'heritage statements').	An agent was most frequently the author of the statement on heritage (53% of statements).

Format of submission	
Statements on heritage were most often submitted as a part of a Design and Access Statement (59% of 'heritage statements').	51% of statements were integrated within the Design and Access Statement, while 49% were included as a standalone 'heritage statement'.
<b>Planning Applications</b>	<b>Listed Building Consent Applications</b>
<b>Statements on Heritage</b>	
Quality	
Two thirds of the 'heritage statements' submitted did not wholly comply with the policy requirement in the National Planning Policy Framework, either just stating the existence of the asset(s) impacted by the application or describing the asset(s) without discussing the asset(s)'s significance.	55% of the 'heritage statements' submitted did not wholly comply with the policy requirement in the National Planning Policy Framework, either simply stating the existence of the asset(s) impacted by the application or describing the asset(s) without any discussion the asset(s)'s significance.
Reference to relevant Historic Environment Record	
Explicit reference to the relevant Historic Environment Record was made in 5% of 'heritage statements' submitted alongside an application for planning permission.	Only one statement on heritage accompanying a listed building consent application made specific reference to the relevant Historic Environment Record.
<b>Engagement with LPA experts</b>	
Conservation Officers	
There was evidence to suggest a conservation officer reviewed and/or commented on the application in 62% of applications with a heritage dimension.	Evidence of conservation officer review and/or comment was present in 87% of listed building consent applications.
Archaeological Officer	
An archaeological officer reviewed and/or commented on 21% of planning applications with a heritage dimension. This reflects the percentage of planning applications with a heritage dimension, where the heritage dimension was an archaeological non-designated asset (21%).	There was evidence of an archaeological officer reviewing or commenting on listed building consent applications in 11% of cases; a conservation officer had also reviewed and/or commented on all these applications.
<b>Engagement with Historic England</b>	
Historic England responded to all planning applications on which it was consulted. There were nine planning applications (1%; 4% of applications with a heritage dimension) on which Historic England should have been consulted; for three of these applications, however, Historic England was apparently not consulted. There were seven applications on which Historic England was apparently unnecessarily consulted.	Historic England responded to all listed building consent applications on which it was consulted. Historic England should have been consulted in 16 of the listed building consent applications (17%). However, there were seven applications on which Historic England was apparently unnecessarily consulted, and one application on which Historic England should have been consulted but apparently was not.

## Retrospective Applications

10% of applications for planning permission were made retrospectively, 74% of which were granted permission. 22% of retrospective planning applications (2% of the sample) had a heritage dimension, of which 84% were granted permission.

8.6% of the listed building consent applications were made retrospectively, and all were granted permission.

Based on these findings, and the data contained in the project spreadsheet, the following recommendations to the planning and listed building consent applications decision-making process, particularly where heritage is a factor are presented for further consideration:

- It would be worthwhile to consider combining or further integrating listed building consent and planning application processes or providing related advice for such applications.
- The lack of 'heritage statements' submitted for planning applications with a heritage dimension, and the large number of statements on heritage where submitted which did not wholly comply with NPPF policy, would indicate a need to revise advice on 'heritage statements' and to review who this should target for greater effectiveness.
- There were some examples of unnecessary consultation of Historic England so a clarification and redress of local planning authority understanding for when this is required may be worthwhile.

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# Introduction

1. This research aims to provide evidence for and to explore the impacts that heritage issues have on planning and listed building consent applications.
2. For this, just under a thousand planning and listed building consent applications were reviewed. Data from these applications was then recorded so as to allow for the assessment of a set of factors (identified and refined through a pilot study) relating to heritage in planning. These heritage issues included the frequency with which heritage assets feature in planning and listed building consent applications, how they feature, and what impact they then have on the decision-making process of those applications.
3. Consequently, some of the more specific questions this study seeks to answer include:
  - What proportion of planning applications had a heritage dimension? What is the nature of that dimension (i.e. type of heritage asset(s))?
  - What is the frequency with which each type of asset is encountered in applications, and which are most commonly encountered in the planning process?
  - What proportion of listed building consent and planning applications met the target determination deadline? Did these planning applications have a heritage dimension? If so, is there evidence that the heritage dimension played a part in the delay?
  - What was the nature of the work being proposed in planning and LBC applications?
  - Who is submitting the applications? What is the proportion of applications being made through an agent? How does this impact the advice being given by Historic England and the audience that Historic England targets?
  - What proportion of applications included a 'heritage statement'? Who was the author? What was the quality of the submitted 'heritage statement'? As such, are NPPF policy requirements being met? Are those completing 'heritage statement' making reference to the relevant HER?
  - What proportion of LBC applications were submitted at the same time as a related planning application? Would it be worthwhile merging the processes?
  - What proportion of applications received/sought pre-application advice?
  - Was Historic England consulted in the relevant cases? And how often was Historic England being consulted when they did not need to be?
  - Were conservation and/or archaeological officers consulted in the relevant cases? And in what proportion of LBC applications and planning applications with a heritage dimension was this done?
4. The *Heritage Dimension of Planning Applications* project complements a Green Balance report for Historic England – *Listed Buildings Consent: A Review of Data*, issued in January 2015 – which collected and analysed a range of data on listed building consent applications. It expands on the scope of that study to include planning applications so as to explore the impact of a broader range of heritage assets beyond (but still including) listed buildings in the planning process.
5. By providing evidence for the incidence of heritage in planning and listed building consent applications, and of the nature and extent of the impact of heritage issues in the decision-making process, the data and findings from this research provides a useful reference for future research into heritage and planning, and can be used to highlight any issues related to planning reform and inform related recommendations and/or actions for planning and listed building consent application processes.

## Methodology

6. A small-scale pilot study, which has informed this research and through which the project methodology was developed and refined, was completed in Spring 2017. Building on the pilot study, nine local planning authorities (LPAs) were selected, providing a geographical spread and a mix of urban, rural and ‘mixed’ urban-rural areas:

Local Planning Authority	LPA Type	Region
Leeds City Council	Urban	Yorkshire
Southampton City Council	Urban	South East
Tower Hamlets Council	Urban	London
East Cambridgeshire District Council	Mixed	East of England
Sefton Council	Mixed	North West
Stafford Borough Council	Mixed	West Midlands
Derbyshire Dales District Council <sup>1</sup>	Rural	East Midlands
Mid Devon District Council	Rural	South West
Northumberland County Council	Rural	North East

7. Data from all listed building consent applications and planning applications, from these nine local planning authorities, decided between 01 April 2016 and 14 April 2016, and 01 September 2016 and 14 September 2016 were recorded in an excel spreadsheet. These sample periods were selected as they represent ‘average’ periods in the year, where the number of applications is typically neither unusually high nor low (according to the best available evidence).
8. A search of the public access websites for the study LPAs within these parameters yielded 895 planning applications and 98 listed building consent applications; a total of 993 applications (see Appendix 2 for detailed summary of the sample composition and the terms which were searched on the LPA websites to form this). Following the removal of 36 withdrawn applications and 3 other applications not relevant to this study from the dataset an overall sample of 954 applications remained for analysis: 861 planning applications and 93 listed building consent applications. This provided a satisfactory sample of applications for review, which would allow for relatively reliable conclusions to be drawn.
9. The data collected included both basic application information, for a general overview of the applications being made, and more specific heritage related information, to determine the impact of the ‘heritage dimension’ where present on these applications and on decision-making processes. Appendix 1 provides a detailed summary of the questions asked by the study, and the factors considered for the data collected, as contained in the final version of the spreadsheet.
10. The data recorded is limited to the information that was available online through the local planning authorities’ public access websites. As such certain details could only be obtained if the relevant documents (such as the application form or decision report) were uploaded to the website. Where documents were not uploaded or information was not included, attempts to mitigate for the impact on the results provided in this study were factored into the data collection, for example through the

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<sup>1</sup> For planning and conservation purposes the district is split between the Derbyshire Dales District Council and the Peak District National Park Authority. Only those applications for parts of the district outside the Peak District National Park were included in this study, i.e., those falling under the responsibility of the Derbyshire Dales District Council.

way in which some questions were phrased. 'Is there evidence that... ' was used for some questions to allow for the (implied) possibility that something may have been done but cannot be confirmed due to an absence of/the unreliable nature of evidence online. For others, an unknown/unclear response option was provided, where a simple yes/no response was not possible due to ambiguous or absent information.

11. It is also worth noting that while the assessment of statement on heritage quality was marked towards a specific set of criteria (see Appendix 1), there was of course an element of subjectivity to the decision made (i.e. in determining how closely a statement met the mark criteria), particularly for those statements where significance was considered by the author.

## Analysis

12. There were 895 planning applications to the selected nine local planning authorities that were decided during the sample periods in April and September 2016. Of these, 34 applications were removed from the sample, including those which had been withdrawn by the applicant and applications which were ‘disposed of’ by the LPA. This left a total of 861 applications for analysis.
13. 9.9% (98) of the total number of planning and listed building consent applications submitted to the nine local planning authorities covered in this research and decided during the study periods were for listed building consent. Five of these applications were withdrawn, however, providing a sample of 93 listed building consent applications for analysis (9.8% of overall sample total).

### The ‘Heritage Dimension’

14. 26% of the planning applications sampled had a heritage dimension – i.e. there was a heritage asset, designated or non-designated (such as locally listed assets or formally-defined archaeological protection areas) directly under consideration as part of the application (setting-only considerations were not included in this definition). Applications with a heritage dimension were most commonly for properties and sites located in a conservation area, which was a factor in 74% of applications with a heritage dimension and 19% of all submitted applications. Grade II listed buildings and non-designated assets were also common heritage assets in the applications examined – a factor in 26% and 23% of applications with a heritage dimension (7% and 6% of all applications in the sample) respectively.

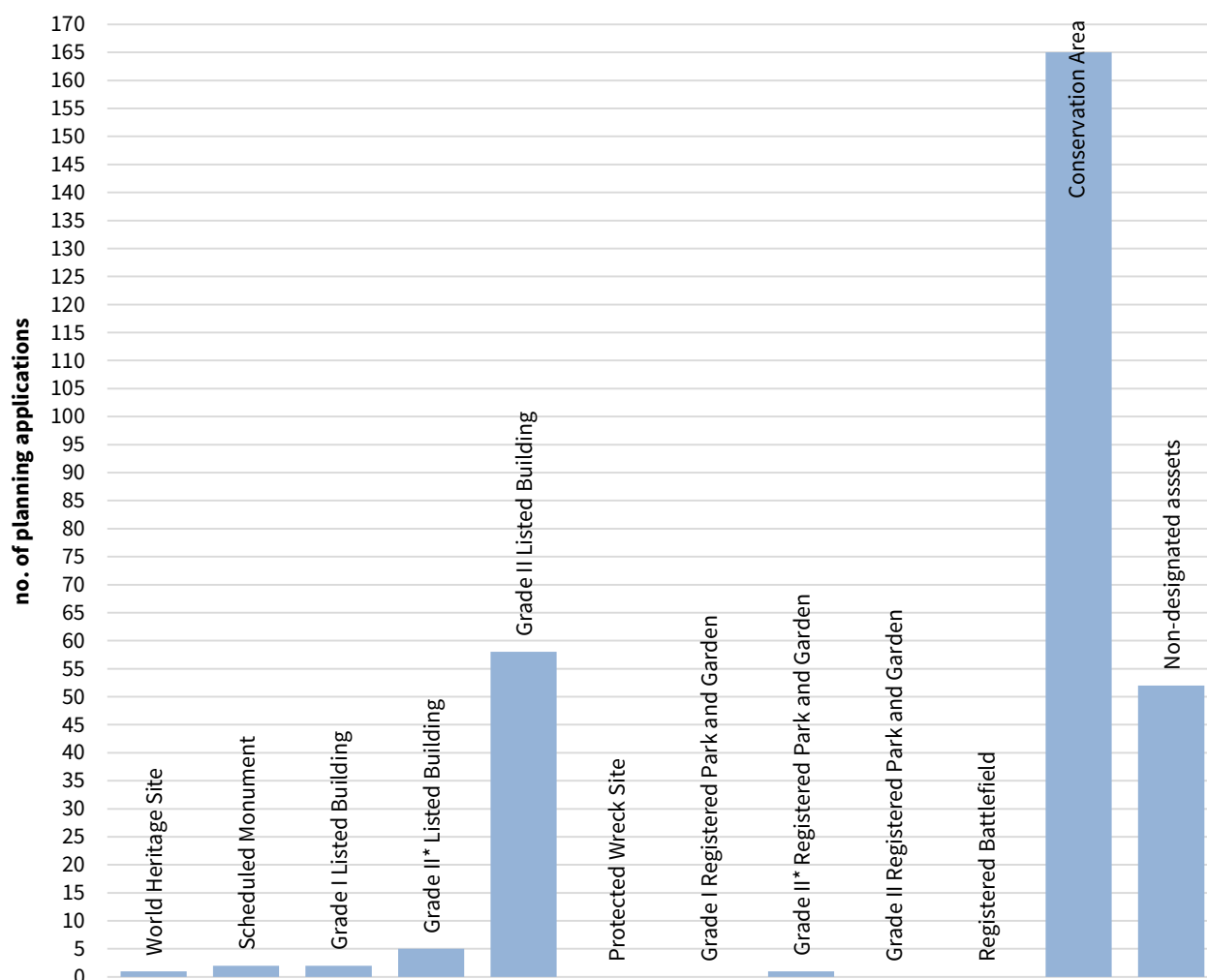


Figure 1: Chart showing the heritage assets encountered in planning applications with a heritage dimension (N=224)

15. In 23% of applications with a heritage dimension (6% of all submitted applications), there was more than one heritage asset for consideration as part of the planning process.

### Non-designated Assets

16. The incidence of non-designated assets was also recorded, so as to determine their prevalence and impact on planning applications compared with designated assets. Non-designated assets are formally identified and protected by local authorities. Locally defined archaeological protection areas accounted for 92% of the non-designated assets identified. Indeed these locally designated archaeological zones were identified as a heritage dimension in 6% of applications submitted, and 21% of the applications with a heritage dimension. Four of the local planning authorities represented in this study were identified as having a local list (see Appendix 3). ‘Locally Listed’ heritage assets were a factor in 0.6% of all the applications reviewed, and 2% of applications with a heritage dimension, across three of the local planning authorities.

## Listed Building Details

17. Most of the listed building consent applications reviewed were proposing works to a Grade II listed building but given that most listed buildings are Grade II listed this is to be expected.

	Domestic (residential)	Mixed use	Non-domestic	Structure	Total
Grade I	2	0	4	0	6 (6%)
Grade II*	2	2	6	0	10 (11%)
Grade II	47	2	25	3	77 (83%)

Table 1: Table showing the grade of listed buildings in the sample and their use

18. The listed buildings in the sample were mostly in either domestic (residential) use, with applicants making alterations to their listed homes or proposing a change of use to residential (55%), or a non-domestic use (35%). Only 4% of listed building consent applications were for mixed use buildings and 3% were for structures.

## The Decision-Making Process

### Planning Applications

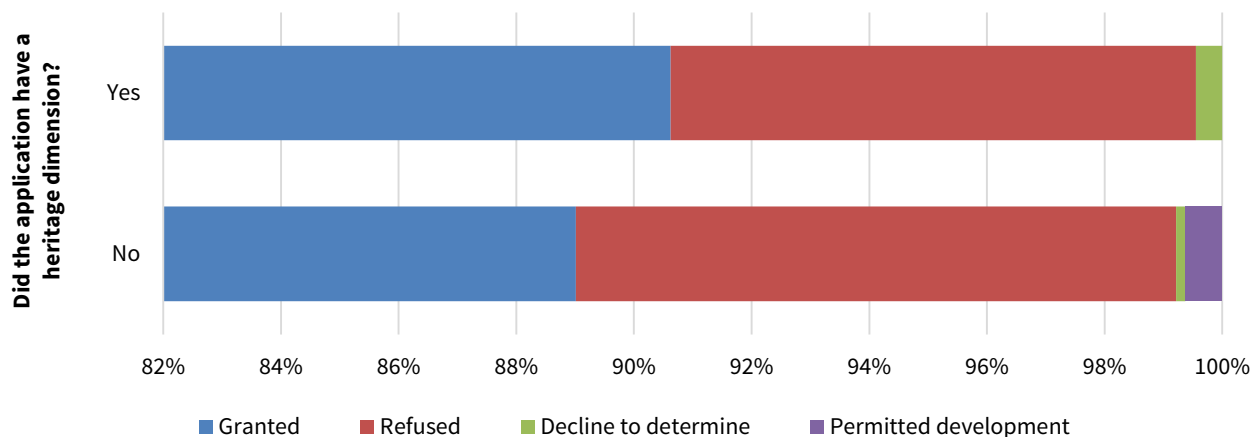
#### Outcomes

19. Planning permission was granted for 89% of all applications in the sample, and for 91% of those with a heritage dimension.

Decision	All applications (of 861 applications)	Applications without a heritage dimension (of 637 applications)	Applications with a heritage dimension (of 224 applications)
Granted	89%	89%	91%
Refused	10%	10%	9%
Other	0.7%	0.8%	0.4%

Table 2: Percentage of the various LPA decisions made for the planning applications sampled

20. As can be seen from Figure 2, there is no significant difference in outcomes for applications with a heritage dimension than for those without a heritage dimension or the wider sample as a whole. Applications with a heritage dimension were granted planning permission in 1.6% more cases, and refused in 1.3% fewer cases, than those with no heritage asset for consideration.



**Figure 2: Chart comparing LPA decisions for the planning applications by whether or not they had a heritage dimension (N=861)**

21. Indeed, when considering the heritage dimension in the decisions made by these local planning authorities, it is interesting to note that the percentage of approved applications with a heritage dimension was directly proportionate to the percentage of applications with a heritage dimension overall (Table 3).

Decision	Applications without a heritage dimension (of 637 applications)	Applications with a heritage dimension (of 224 applications)
Granted	74%	26%
Refused	76%	24%
Other	83%	17%

**Table 3: LPA decisions on the planning applications by whether or not there was a heritage dimension**

22. The ‘Other’ outcomes included two applications with a ‘decline to determine’ decision, one of which was for an application with a heritage dimension.

### Determination Deadlines – On Time?

23. Of the total sample of planning applications, 84% were determined on time. 13% of the applications approved by the determination date had extension of time agreements. Of the 16% that were determined after the deadline, 3% were granted an extension of time on the determination date.

24. 96% of applications were standard applications with an 8 week determination deadline, of which 73% were determined within the 8 weeks and a further 12% had agreed an extension of time. The other 4% of applications were major applications with a 13 week determination deadline. Of these 38% were decided within the 13 weeks and a further 35% were granted an extension of time.

On time?	All applications (of 861 applications)	Applications without a heritage dimension (of 637 applications)	Applications with a heritage dimension (of 224 applications)
Yes	84%	86%	77%
No	16%	14%	23%

**Table 4: Percentage of planning applications determined on time**

25. 84% of applications were determined on time. While only 14% of applications without a heritage dimension, and 16% of applications overall, were not determined on time, the same was true for 23% of those with a heritage dimension. However, 77% of applications with a heritage dimension were still determined on time and where this was not the case, consideration of the heritage asset affecting that application may not have been the reason for the delay of the decision, but may instead be a

coincidental factor in the application. For example in some cases there was evidence to suggest delays were caused by completion of bat reports, delayed submission of amended plans, or environmental surveys; details outside the scope of this study and so were not recorded. In others, as in most applications, the cause for delay is not immediately clear from the information available online.

26. When considering all applications that were determined after the deadline, 37% had a heritage dimension.
27. The average number of weeks taken to determine a planning application was 10.2 weeks for all applications in the sample. For those with a heritage dimension, determination of planning applications took an average of 11.4 weeks. However, the modal average for determination both overall and for those applications with a heritage dimension in standard applications was 8 weeks and 12.9 weeks for major applications overall and 13 weeks for major applications with a heritage dimension, so while the mean average indicates local planning authorities were generally slow in determining the outcome, and even more so for applications with a heritage dimension, the modal average shows that local planning authorities were, in fact, mostly determining applications within the expected 8 or 13 weeks.

### Related Applications

28. 23% of planning applications with a heritage dimension (and 6% of the total number of planning applications) had a related listed building consent application. While 6 of the related listed building consent applications (12%) were either not submitted or not determined at the same time, the other 45 (88%; 20% of applications with a heritage dimension) were processed and decided simultaneously.

### Listed Building Consent Applications

#### Outcomes

29. 86 (92%) of the listed building consent applications were granted, the remaining seven (8%) were refused.

#### Determination Deadlines – On Time?

30. 84% of the listed building consent applications were determined on time, with six of the local planning authorities reviewed meeting the determination deadline in at least 75% of applications. The average number of weeks for the determination of a listed building consent application was 11.3 weeks; however, there was a modal average for determination of 7.9/8 weeks indicating that applications were mostly determined within the 8 week timeframe.
31. An extension of time was agreed for 17 (18%) of the applications submitted: 12 of these applications were then determined on time (15% of those determined on time); the other five were not (33% of those which did not meet their determination deadline).

### Related Applications

32. Of the 49 listed building consent applications that had a related application (53% of listed building consent applications), one of these was for advertising consent, and four of the related planning applications were either submitted, or decided on a different date to the listed building consent. Therefore 44 of the 93 listed building consent applications (47%) submitted during the study periods were submitted with a related and concurrent planning application which was processed simultaneously.

## Works Proposed

### Planning Applications

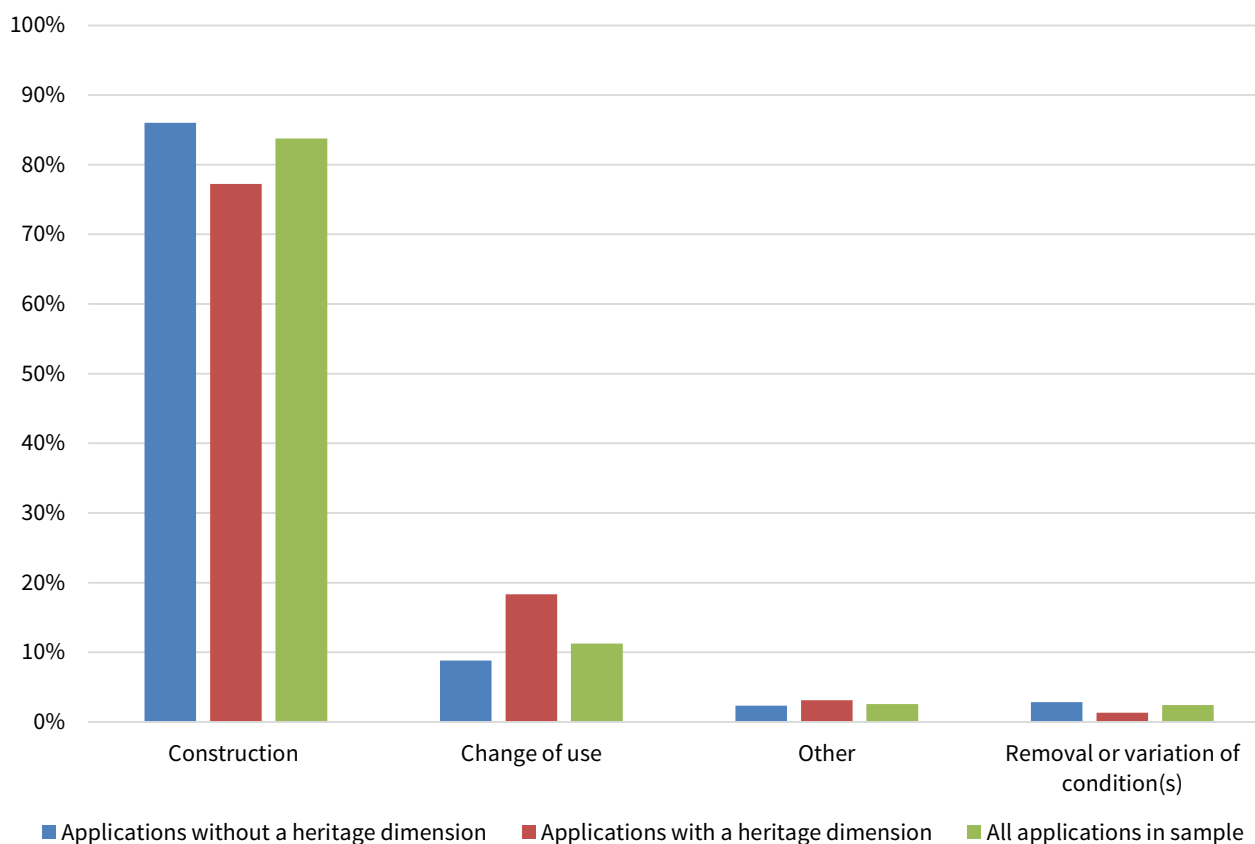
33. The majority of planning applications made (84%) were for construction works, and more specifically for the alteration or extension of a property.



		All applications (of 861 applications)		Applications without a heritage dimension (of 637 applications)		Applications with a heritage dimension (of 224 applications)	
Construction	Alteration or extension	67%	84%	68%	86%	61%	77%
	Separate new build	9%		7%		5%	
	Replacement build	2%		2%		2%	
	Other	7%		9%		9%	
Change of use		11%		9%		18%	
Removal or variation of condition(s)		2%		3%		1%	
Other		3%		2%		3%	

**Table 5: Percentage of works proposed in planning applications, with breakdown of construction type**

34. Construction work, and specifically alteration or extension, was also the most common type of work proposed among applications with a heritage dimension (77%); however, it was less frequently proposed than in applications without a heritage dimension (86%), and planning applications overall. There was proportionally a greater occurrence of 'Change of Use' applications among planning applications with a heritage dimension than those without a heritage dimension, and among planning applications overall.



**Figure 3: Chart comparing types of work proposed in applications with a heritage dimension against those without a heritage dimension, and the overall sample (N=861)**

35. When looking specifically at the type of construction work undertaken, the proposed work predominantly comprised alterations and extensions to existing properties. When this is considered

in conjunction with the application and applicant type, it is clear that the planning applications submitted were mostly householder alterations and extensions undertaken by private individuals.

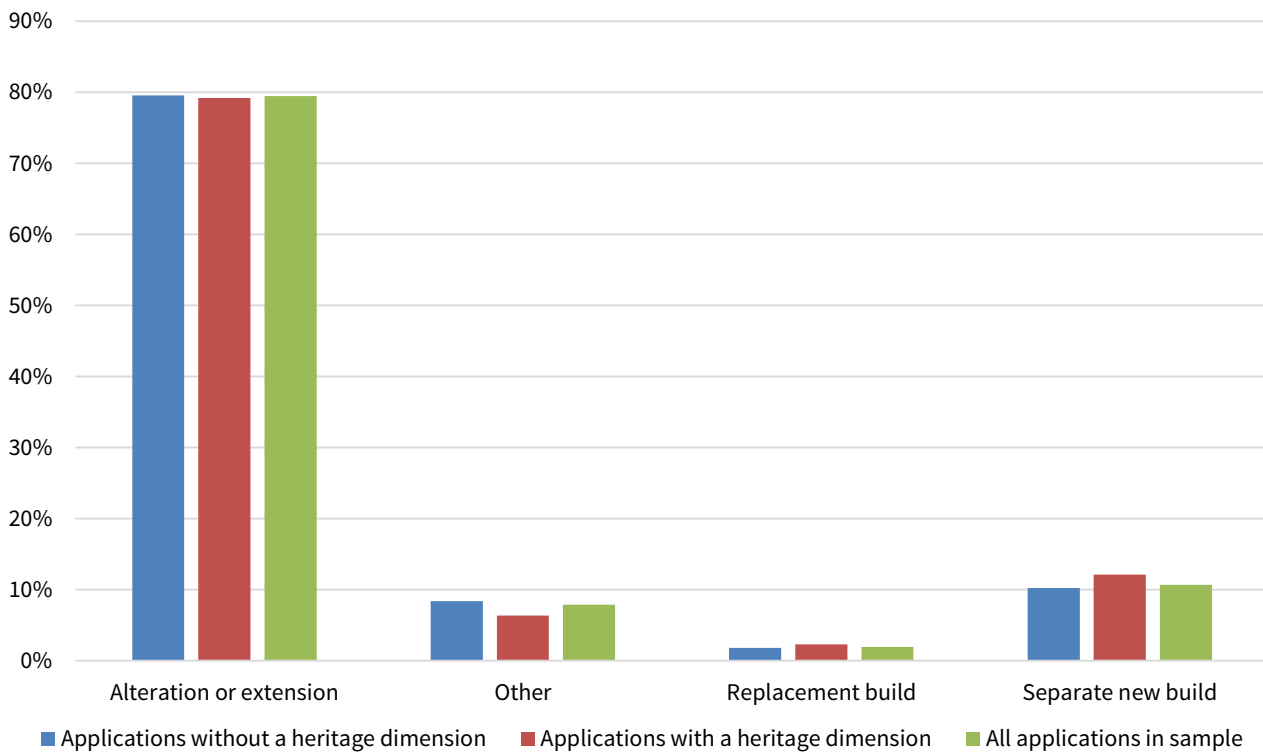


Figure 4: Chart comparing construction type proposed as a percentage of construction works proposed in planning applications with a heritage dimension against those without, and the sample as a whole (N=721)

### Listed Building Consent Applications

36. ‘Internal: other’ (47% of applications) and ‘doors and windows’ (43% of applications) were the most common types of work proposed while the ‘restoration of historic features’ (1% of applications), accessibility alterations (2% of applications), and major extensions (4% of applications) were the least common.

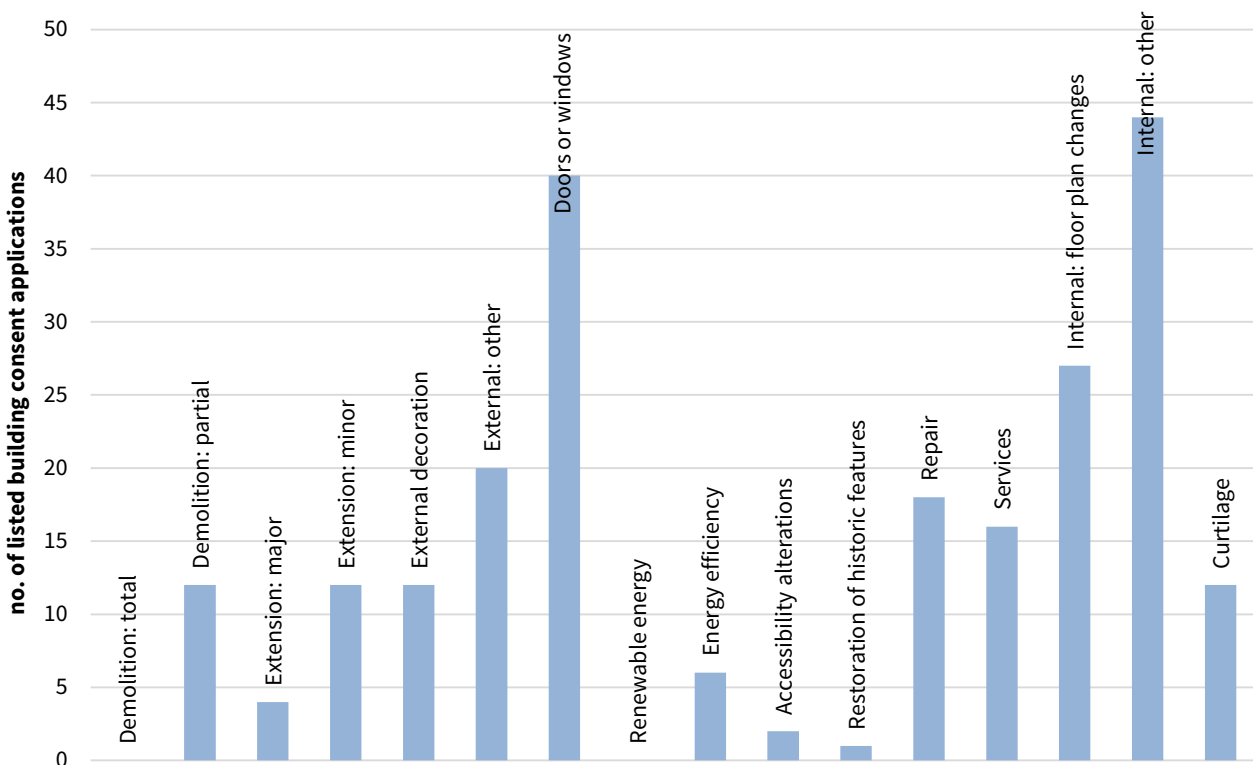


Figure 5: Chart showing the nature of the works proposed in the submitted listed building consent applications (N=93)

37. Proposed works for the seven refused listed building consent applications comprised: partial demolition (one application); major extension (one application); minor extension (one application); external decoration (one application); changes to curtilage (one application); other external works (two applications); other internal works (two applications); and works to doors or windows (four applications). Of these seven applications, one went to appeal but was dismissed, another was resubmitted and refused, and a third was resubmitted and approved.

## Applicant and Application Details

### Planning Applications

#### Application Type

38. Householder applications were the most common type of application submitted. They accounted for 65% of applications where the type was recorded. Major applications only accounted for 5% of planning applications where type was recorded, and minor commercial applications were even less common at 4% of applications where type was recorded. No record of application type was made for change of use applications.

	No. of applications	% of applications
Householder	490	65%
Major	37	5%
Minor commercial	32	4%
Other	200	26%

Table 6: Application type for planning applications submitted

39. This was also the case for applications with a heritage dimension, where Householder applications accounted for 63% of applications. Applications with a heritage dimension had proportionally more Minor Commercial applications (7%), and proportionally more Major applications (6%) than those without a heritage dimension (3% and 5% respectively), and proportionally more than represented by the sample overall.

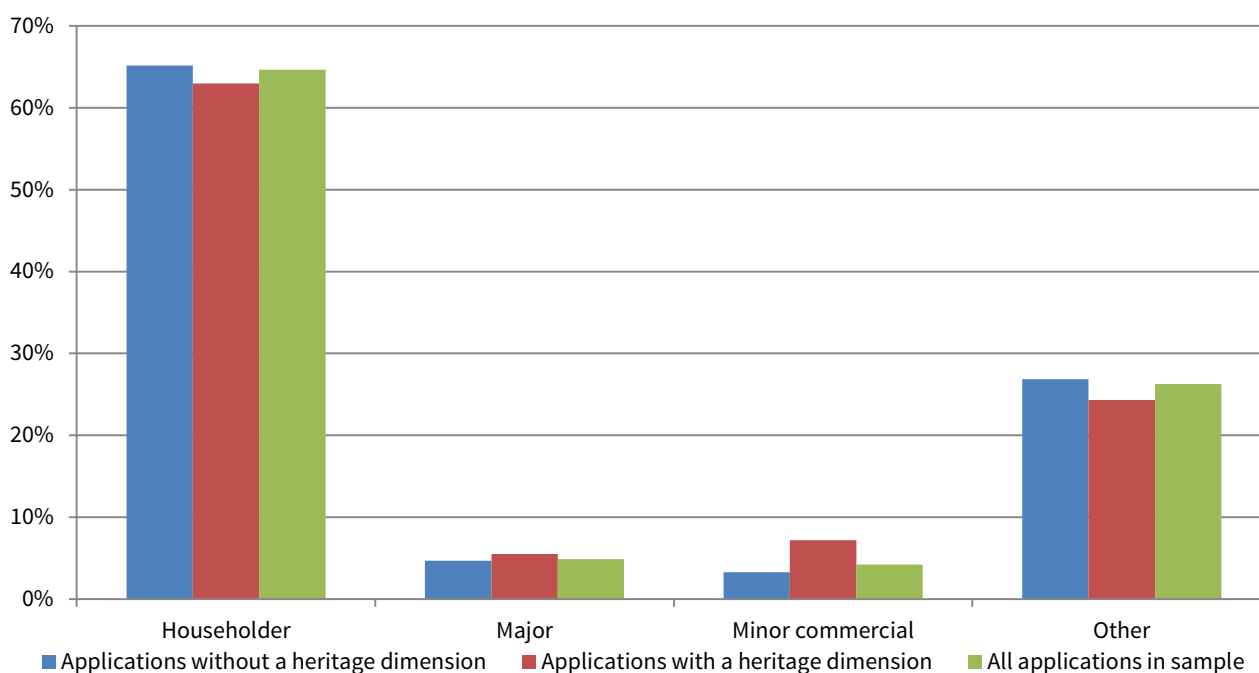


Figure 6: Chart comparing application type for applications with a heritage dimension against those without, and the overall sample (N=759)

## Applicant Type

40. Most applicants seeking planning permission were private individuals. Although still the most frequent of applicants, there were, proportionally, fewer applications by private individuals in cases where there was a heritage dimension than when there was not (and in the sample overall). There were also a higher proportion of commercial applicants in applications with a heritage dimension. A recent survey of listed building owners, commissioned by Historic England, found that there was a significant amount (21% of respondents) of commercial activity occurring in listed properties, particularly (ECORYS, 2017: 3, 22).

	All applications (of 861 applications)	Applications without a heritage dimension (of 637 applications)	Applications with a heritage dimension (of 224 applications)
Individual (private)	72%	73%	66%
Commercial	21%	19%	25%
Other	5%	5%	6%
Unclear/unknown	2%	2%	2%

**Table 7: Percentage of applicant type for all planning applications submitted, compared against percentages of application type for applications with and without a heritage dimension**

41. ‘Other’ applicants in the sample included schools, charities, and city and county councils.

## Use of an Agent

42. From the data it is evident that applicants frequently rely on an agent to complete planning applications on their behalf. 79% of applications overall used an agent for their planning application, and when looking just at those applications that had a heritage dimension the percentage of applicants which used an agent was 81%.

	All applications (of 861 applications)	Applications without a heritage dimension (of 637 applications)	Applications with a heritage dimension (of 224 applications)
Yes	79%	78%	81%
No	21%	22%	19%
Unclear	1%	1%	0%

**Table 8: Table demonstrating percentage of applications for which an agent was or was not used (or for which it was unclear) in the overall sample of applications, compared against percentages for applications with and without a heritage dimension**

43. Among the applications reviewed, the types of agent encountered include, but are not limited to, architects, estate agents, construction industry professionals, planning professionals, engineers, and large consultancy firms: not all will have necessarily had heritage expertise.

## Pre-Application Advice

44. Based on the information that was included with the online applications, only 30% of applicants sought, or received, any kind of pre-application advice. For the purposes of this study, pre-application advice was considered to have been sought if the applicant had claimed to have done so on the application form; whether formally or informally, whether or not further details were provided by the applicant or the LPA, and in cases where the applicant had received feedback on a previously rejected or withdrawn related application. Given the breadth of what was considered pre-application advice

the number of applicants who had stated that they sought any, or at least for whom there was evidence to indicate this, is low.

45. However, for the sample of applications reviewed, applicants were 10% more likely to seek pre-application advice when there was a heritage dimension to the application (38%) than when there was not (28%), and 8% more so than for the sample as a whole.

### Residential Land Use Changes

46. While land use data was not recorded, changes in residential land use – whether this was through a residential gain or loss – was noted. Although most applications did not involve/propose any residential changes, the percentage of applications which did was higher among applications with a heritage dimension (20%) compared to those without a heritage dimension (11.5%) and for the sample overall (14%).

	All applications (of 861 applications)	Applications without a heritage dimension (of 637 applications)	Applications with a heritage dimension (of 224 applications)
No	86%	89%	80%
Yes - Gain	13%	11%	19%
Yes - Loss	1%	0.47%	1%

**Table 9: Table demonstrating residential gain and loss in the overall sample of planning applications, compared with residential gain and loss in planning applications with and without a heritage dimension**

47. 38 of the 42 applications with a heritage dimension that were proposing a residential gain were granted planning permission. Of the 38 approved applications, 60% were for sites or properties within a Conservation Area; 26% of the properties were a Grade II listed building; and 41% affected a non-designated asset (36% of an archaeological nature, 5% locally listed). The four applications which were refused permission were all within a Conservation Area. Two of these applications were refused on design and conservation area character grounds, rather than the principle of development; the other two were refused on grounds other than heritage impact (quality of proposed living conditions and a Tree Preservation Order).
48. A negligible number of applications proposed a residential loss.

### Listed Building Consent Applications

#### Applicant Type

49. Listed Building Consent applications were most frequently submitted by private individuals, who accounted for over half of applicants submitting listed building consents to the sample LPAs during the two specified two-week periods in April and September 2016. Just under a third of listed building consent applications were made by commercial applicants – a fairly substantial proportion.

	No. of applications	% of applications
Commercial	27	29%
Individual (private)	48	52%
Other	13	14%
Unknown/unclear	5	5%

**Table 10: Table showing who the applicant was for the listed building consent applications reviewed**

50. 'Other' applicants encountered included schools, social housing associations, charities, and borough, city and county councils.
51. In 5% of cases the applicant was either unknown (for example, their information was redacted from the online documents) or it was unclear from the documents available online (as in cases where only the agent details were provided).

### Use of an Agent

52. As with planning applications, applicants frequently used an agent for listed building consent applications. In 76% of applications an agent was used, and the types of agent encountered included architects, property and estate services, large consultancy firms, construction professionals, engineers, and planning professionals. It was unclear for one application (1%) if an agent was used.

### Pre-Application Advice

53. For just over half the LBC applications sampled (51%), either the applicant claimed to have sought pre-application advice, including from feedback of previously refused or withdrawn related applications, or there was some evidence to suggest that this was the case. This is higher than the percentage of applicants seeking pre-application advice for a standard planning application. This may indicate that perhaps there is a greater awareness of the need for advice among applicants where listed buildings are involved as it is immediately evident that these applications are less straightforward i.e. that there is this significant factor that has to be weighed up in the local planning authority decision. According to the listed building owners survey conducted on behalf of Historic England, a similar percentage of those surveyed (46%) had "had direct contact with a Local Authority about planning matters in the last 5 years" (ECORYS, 2017: 12).

## Statements on Heritage

### Planning Applications

54. A 'heritage statement' was submitted with 13% of applications overall, and with 49% of applications with a heritage dimension. As such, the government policy requirement that "[i]n 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" (NPPF, para. 128) is not being met in over half the applications with a heritage dimension. Of the 113 applications that included a statement on heritage, three (0.5%) were for applications that did not have a heritage dimension but were close to heritage assets that could be affected by the application submitted. These were submitted as a standalone 'heritage statement'.

Heritage Asset	% of applications with a heritage dimension but no statement on heritage (114 applications)
Conservation Area	77%
Non-designated assets	25%
Grade II listed building	12%
Scheduled Monument	2%
World Heritage Site	1%

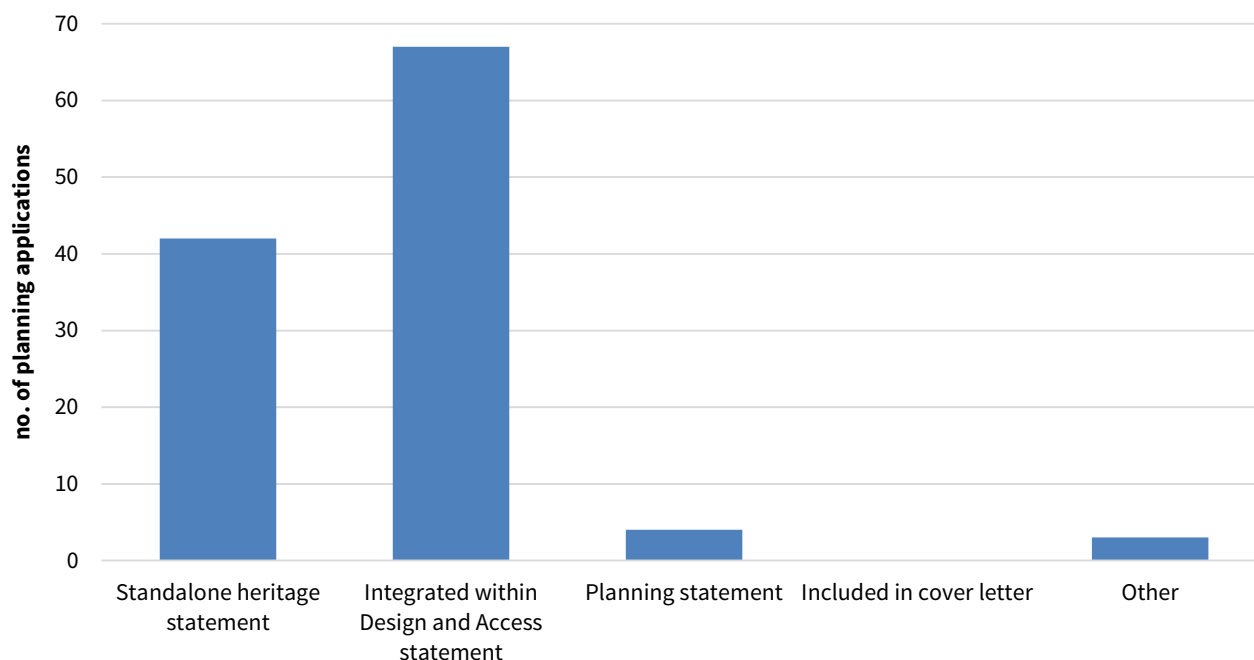
**Table 11: Table highlighting the types of heritage assets occurrent in applications with no 'heritage statement'**

55. For applications with a heritage dimension where a statement on heritage was not provided, Conservation Areas were the most common heritage asset occurrent in the applications (77% of these applications), and a non-designated asset was a factor in a quarter of the applications. Interestingly, of these 114 applications, although no 'heritage statement' was provided, 104 (91%) were granted

planning permission. There was evidence of a conservation officer reviewing and/or commenting on 54 of the applications (6% of all applications and 24% of applications with a heritage dimension), and evidence of an archaeological officer reviewing and/or commenting on 23 of the applications (2.8% of all applications and 10% of applications with a heritage dimension). Of the 56 applications where neither a conservation officer nor an archaeological officer reviewed and/or commented on the application (6.5% of all applications; 25% of applications with a heritage dimension), 49 were granted planning permission. In the absence of a statement on heritage or a conservation officer or archaeological officer review of these applications, the decision to approve these applications may not have been particularly well-informed about the impact on the heritage asset significance and its setting.

## Statements on Heritage: Formats

56. Inclusion as part of the Design and Access Statement was the principal format of submission for statements on heritage (58% of 'heritage statements'). 36% of 'heritage statements' were submitted as a standalone document. These two formats appear to be the main formats of submission, with the use of other formats for submission proving to be negligible in the applications reviewed (6%; 3% included in planning statements, and 3% submitted in 'other' formats).



**Figure 7: Chart showing the number of 'heritage statements' submitted in each of the various formats used by applicants (N=113)**

57. For three of the statements on heritage that were submitted, the statement was provided in or across more than one document.
58. All three of the statements recorded as having been submitted under an 'Other' format were part of a desk-based archaeological assessment. All three related to formally identified archaeological areas of protection (non-designated assets) and all three discussed the significance of the heritage asset, as well as others within the area in sufficient detail to understand the potential impact of the proposal on its significance.

## Design and Access Statements

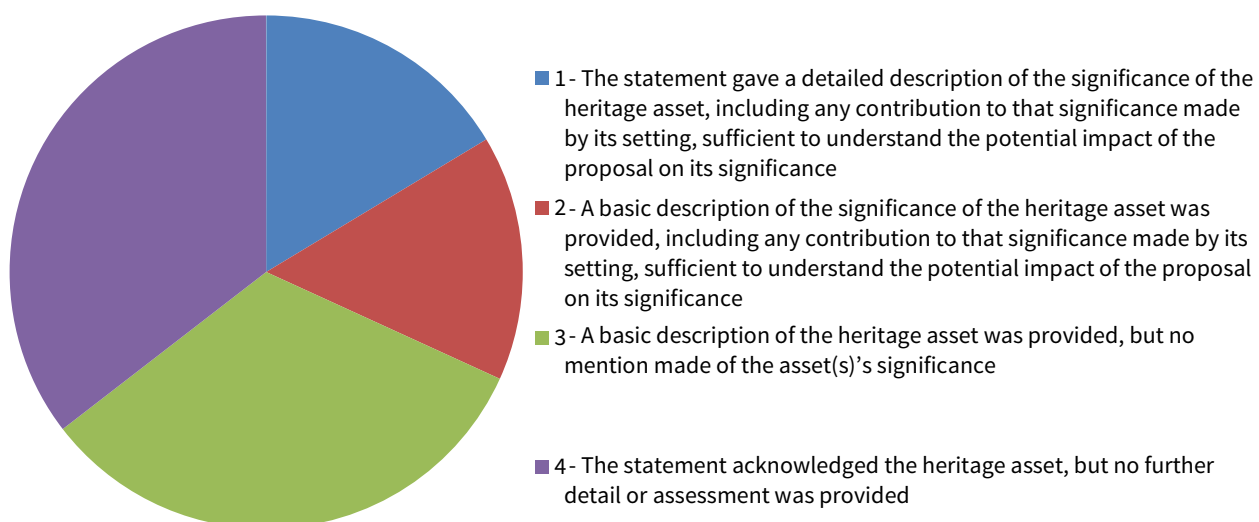
59. In line with the Town and Country Planning (Development Management Procedure) (England) (Amendment) Order 2013, a Design and Access Statement is required as part of an application when it is a major application, when it is a listed building consent application, or when the site or property affected is part of a World Heritage Site or Conservation area and the application is proposing one or more dwellings or a building(s) with floor space of 100m<sup>2</sup> or more. Consequently, of the planning applications reviewed 52 (6% of all applications) were required to include a Design and Access

Statement; 26 major applications, and 26 of the applications within a conservation area. Of these, 50 applications included a Design and Access Statement; 25 major applications and 25 of the applications in a conservation area.

- 60. Seven of the major applications with a Design and Access Statement had a heritage dimension, and three included the statement on heritage as part of the Design and Access Statement. Of the other four, three included a ‘heritage statement’ in another format. Of the 25 applications in a conservation area with a Design and Access Statement, 15 integrated the ‘heritage statement’ within the Design and Access Statement and seven of the other ten included this with the application in some other format. The one application that did not include a Design and Access Statement, did not submit a ‘heritage statement’ either. Notably 36 applications for sites or properties that were part of a conservation area integrated their ‘heritage statement’ within a Design and Access Statement, even though a Design and Access statement was not a requirement of the application.
- 61. While one application fell within a World Heritage Site, based on the nature of the works proposed a Design and Access Statement was not a requirement. This application did not include a statement on heritage either despite being part of a world heritage site, within a conservation area, and a Grade II listed building.

### Quality of Statements on Heritage

- 62. Where a statement on heritage was encountered, it was assessed on a set of criteria to determine how well NPPF requirements were being met. There were four categories defined, to which a statement could be assigned: 1, the statement gave a *detailed description of the significance of the heritage asset(s), including any contribution to that significance made by its setting, sufficient to understand the potential impact of the proposal on its significance*; 2, a basic description of the significance of the heritage asset(s) was provided, including any contribution to that significance made by its setting, sufficient to understand the potential impact of the proposal on its significance; 3, a basic description of the heritage asset was provided, but no mention made of the asset(s)’s significance; and 4, the statement only acknowledged the heritage asset(s), and no further detail/assessment was provided.
- 63. Of those applications with a heritage dimension that submitted a statement on heritage, 35% did little more than acknowledge the heritage asset(s) relating to the site, and a further 33% simply provided a description of the asset(s). The remaining 31% discussed the asset(s)’s significance, including any contribution to that significance made by its setting, sufficient to understand the potential impact of the proposal on its significance; with 15% providing a basic description of the significance of the asset(s) and the other 16% discussing this significance in more detail.



**Figure 8: Chart comparing the quality of ‘heritage statements’ submitted (for applications which had a heritage dimension) according to the mark scheme applied in the study (N=110)**

- 64. The large percentage of statements which failed to provide even a basic description of the heritage assets significance, as required by the NPPF, would suggest that greater clarification on how to write a



statement, of what needs to be included and what does not, or of where this information can be found, is necessary. Moreover, a greater clarification for applicants of what constitutes the heritage asset would also be valuable as many of the statements (particularly those in Conservation Areas) confused the property, or the new addition to it, for the heritage asset.

### The Historic Environment Record

- 65. There was a reference to the relevant Historic Environment Record (HER) in 5% of those statements on heritage for applications with a heritage dimension (4% of ‘heritage statements’ submitted). As required by the NPPF, the relevant Historic Environment Record should as a minimum be consulted by applicants when completing statements of heritage significance for the local planning authority. While this may suggest that not many applicants are consulting a HER, the absence of an explicit reference does not necessarily mean that the HER was not used, just that its use was not explicitly acknowledged. It does nevertheless highlight that in 5% of cases the HER was definitely consulted.
- 66. In the five applications where use of the relevant HER was explicitly referenced, the ‘heritage statement’ had fully met the NPPF requirements, providing “*a detailed description of the significance of the heritage asset(s), including any contribution to that significance made by its setting, sufficient to understand the potential impact of the proposal on its significance*” – accounting for over a quarter of the applications which had wholly met the NPPF requirements (19 applications were categorised as a ‘1’; see Figure 7).
- 67. In 2% of the statements submitted, although no reference was made to the relevant HER, a source relevant to the HER or sites which link to HER data such as the Heritage Gateway or PastScape were instead referenced. These sites provide easy and free alternative access to Historic Environment Record and National Record of the Historic Environment (NRHE) data online, making the information more easy and convenient to search and obtain. However, these sources, while providing a useful source for heritage information are not always complete, PastScape, for example, which provides NRHE data, gives access only to basic resources online, with further detail requiring archive access. Alternatively, Heritage Gateway provides access to data from around 60% of Historic Environment Records, among other sources.

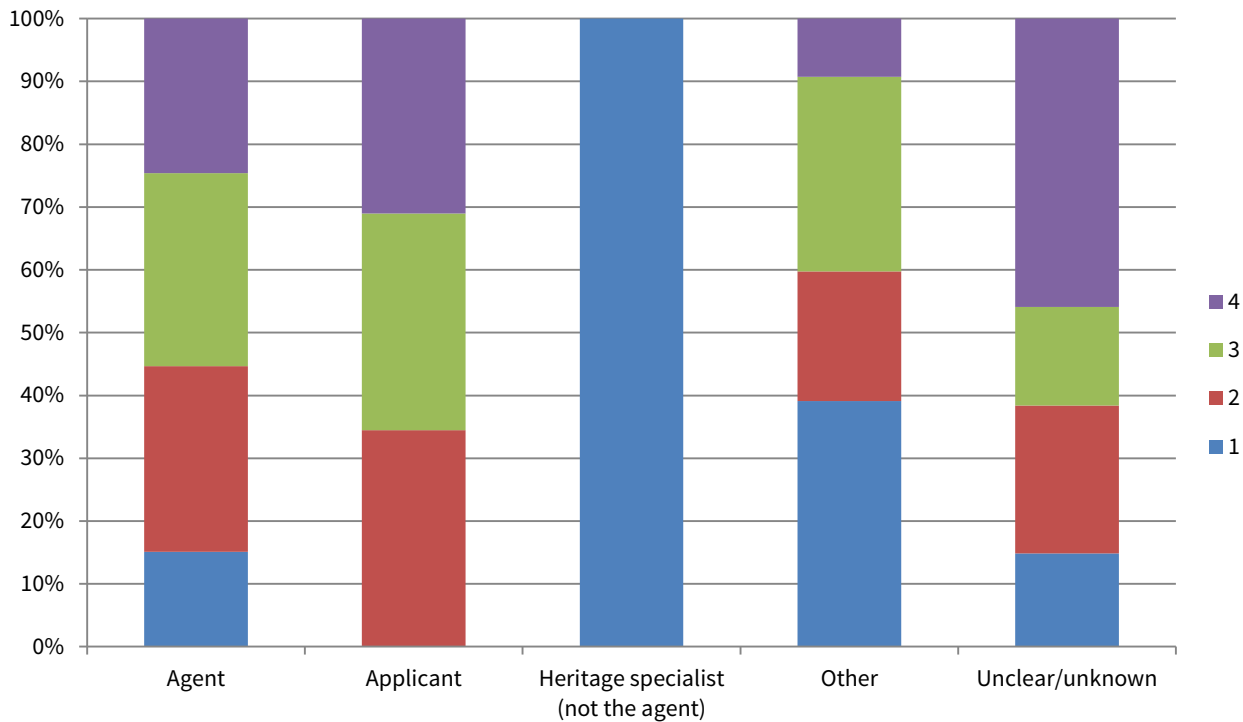
### Statement on Heritage Authors

- 68. ‘Heritage statements’ were most frequently prepared by the agent (who may or may not have had heritage expertise), with this being the case in 63% of applications with a statement – and a large proportion of the statements with an identified author. It was unclear who wrote the statement in 19% of applications. Statements written by an agent were generally of variable quality, with only 10% of these statements providing *a detailed description of the significance of the heritage asset, including any contribution to that significance made by its setting, sufficient to understand the potential impact of the proposal on its significance*”.

	No. of statements	% of statements
Agent	71	63%
Applicant	5	4%
Heritage specialist (not the agent)	8	7%
Other	7	6%
Unclear/unknown	22	19%

**Table 12: Table showing the authors of the ‘heritage statements’ submitted alongside planning applications**

- 69. Conversely, a heritage specialist wrote the statement on heritage in 7% of applications, all of which wholly complied with the policy requirement in the National Planning Policy Framework.



**Figure 9: Chart comparing the quality of 'heritage statements' submitted based on the author of the statement (N=110)**

*1 - The statement gave a detailed description of the significance of the heritage asset(s), including any contribution to that significance made by its setting, sufficient to understand the potential impact of the proposal on its significance; 2 - A basic description of the significance of the heritage asset(s) was provided, including any contribution to that significance made by its setting, sufficient to understand the potential impact of the proposal on its significance; 3 - A basic description of the heritage asset was provided, but no mention made of the asset(s)'s significance; and 4 - the statement only acknowledged the heritage asset(s), and no further detail/assessment was provided.*

70. The applicant wrote the statement on heritage in only 4% of statements where the author is known; however, none of these statements provided more than a basic description of the heritage asset(s)'s significance.

## Listed Building Consent Applications

71. Although it is a policy requirement for a statement on heritage to be included in applications where a heritage asset is affected, a statement on heritage was not submitted for five (5%) of the listed building consent applications reviewed.
72. For the five listed building consent applications where a statement on heritage was not submitted, a conservation officer reviewed and/or commented on four of these applications, so the heritage significance and impact was still considered. All five were granted permission.

## Statements on Heritage: Formats

73. 'Heritage statements' were most commonly integrated within the Design and Access Statement (51% of the applications), but were also almost as likely to be submitted as a standalone document (49% of the applications).
74. In four of the applications however the statement was included in or across multiple documents. This resulted in some unnecessary repetition of information in some of the applications. Moreover, in one application, for example, the relevant information was provided partly in one document and partly in another so it may have been unclear where to include this information resulting in the details required for a statement on heritage being submitted as parts of different documents.
75. Only one application used an 'Other' format. The application had an accompanying archaeological desk-based assessment which while focusing on the non-designated archaeological heritage, discussed the significance of the listed building (and any other designated heritage in the area) also.

Nevertheless, applications where the statement on heritage was submitted in an ‘Other’ format or included in the Planning Statement were infrequent (4% of statements).

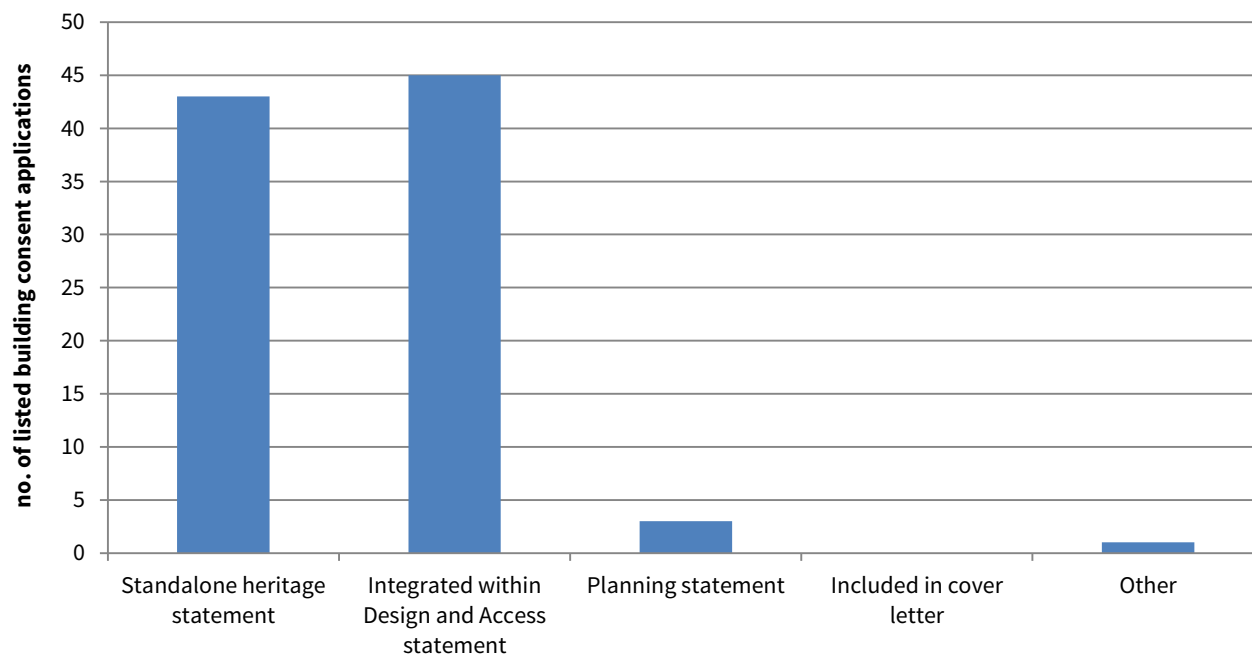


Figure 10: Chart showing the format of submission for ‘heritage statements’ accompanying LBC applications (N=88)

## Design and Access Statements

76. As a legislative requirement (the Town and Country Planning (Development Management Procedure) (England) (Amendment) Order 2013), all listed building consent applications must be accompanied by a Design and Access Statement. A Design and Access Statement was submitted for 68 of the listed building consent applications; over half (45) had integrated the ‘heritage statement’ into this, 22 provided the statement on heritage in another format, and one did not submit a statement on heritage. Of the 25 listed building consent applications that did not submit a Design and Access Statement, four applications did not include a ‘heritage statement’ as part of their application either. One application submitted a Design and Access Statement, but no statement on heritage.

## Quality of Statements on Heritage

77. Over half of the ‘heritage statements’ (55%) provided did not wholly comply with NPPF requirements; they either simply acknowledged the heritage asset(s) (8%) or gave a basic description, with no mention of the asset(s)’s significance (47%). Rather surprisingly, in two of these applications, the statement was submitted on a “‘heritage statement’ template’ pro forma provided by the local planning authority, where the necessary information required was outlined, but neither discussed significance. There was confusion in one case on the part of the applicant as to what constituted the heritage asset, indicating that for the public there may need to be more clarity about the terms being used.
78. A larger proportion of ‘heritage statements’ accompanying listed building consent applications provided at least a basic description of the significance of the heritage asset (i.e. category ‘1’ or ‘2’ as seen in Figure 11), than for those accompanying planning applications with a heritage dimension. 45% of statements on heritage submitted with listed building consent applications did so, whereas this was only the case for 31% of statements accompanying planning applications. This may be as a result of the nature of the heritage asset. It was apparent from some of the statements on heritage that the authors were not entirely clear about what the term ‘asset’ referred to, so for example it may be less clear that in a conservation area (the heritage asset most prevalent in applications with a heritage dimension that did not include a heritage statement) they need to discuss significance of this rather than the property whereas for a listed building the property is obviously itself the asset.

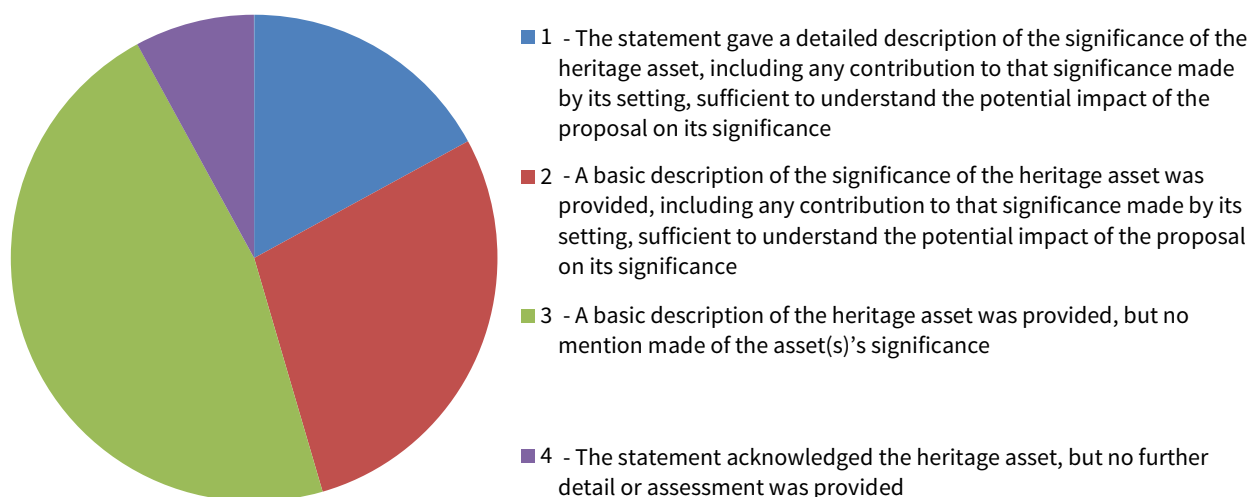


Figure 11: Chart showing the quality of 'heritage statements' submitted with listed building consent applications (N=88)

## The Historic Environment Record

79. Only one (1%) of the statements on heritage included a reference to the relevant Historic Environment Record. As already noted for the planning application statements on heritage, it is a National Planning Policy Framework policy requirement that the Historic Environment Record is, as a minimum, consulted when writing a statement on heritage significance; however, while an explicit reference allows for incidences of Historic Environment Record use to be confirmed, it is not a definitive indicator of an applicant's failure to consult the Historic Environment Record.
80. While the other 99% (87 statements) did not explicitly reference use of a Historic Environment Record four of these applications reference the use of a source with similar data to the Historic Environment Record or which links to Historic Environment Record data, such as PastScape or the Heritage Gateway.

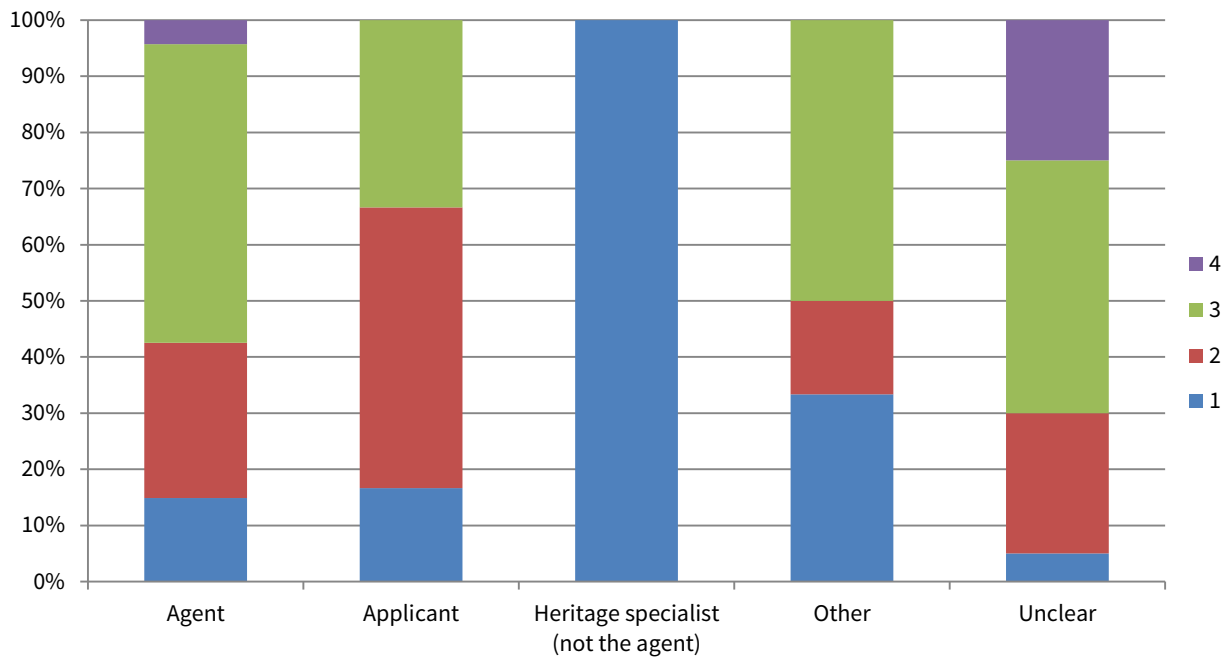
## Statement on Heritage Authors

81. As an agent was frequently used for the application process, 'heritage statements' were also principally written by the agents, as similarly noted above for planning applications. In almost a quarter of applications it was unclear who the author of the statement was.

Author	No. of applications	% of applications
Agent	47	53%
Applicant	12	14%
Heritage specialist (not the agent)	3	3%
Other	6	7%
Unclear	20	23%

Table 13: Table showing the authors of the 'heritage statements' submitted for the listed building consent applications reviewed

82. A heritage specialist other than the agent was the author in 3% of applications. And where a heritage specialist wrote the statement they wholly complied with NPPF requirements, providing a "detailed description of the significance of the heritage asset, including any contribution to that significance made by its setting, sufficient to understand the potential impact of the proposal on its significance".



**Figure 12: Chart showing the quality of 'heritage statements' submitted with listed building consent applications, based on the author (N=88)**

*1 - The statement gave a detailed description of the significance of the heritage asset(s), including any contribution to that significance made by its setting, sufficient to understand the potential impact of the proposal on its significance; 2 - A basic description of the significance of the heritage asset(s) was provided, including any contribution to that significance made by its setting, sufficient to understand the potential impact of the proposal on its significance; 3 - A basic description of the heritage asset was provided, but no mention made of the asset(s)'s significance; and 4 - the statement only acknowledged the heritage asset(s), and no further detail/assessment was provided.*

## Engagement with Local Planning Authority Experts

### Planning Applications

83. Based on the available evidence online, a conservation officer reviewed and/or commented on 62% of applications with a heritage dimension, and on 19% of all applications sampled. A conservation officer may also have reviewed other applications, but where evidence was not available online this was not possible to determine.
84. Interestingly in 4% of applications without a heritage dimension, there was evidence that a conservation officer reviewed and/or commented on the application. However, as above, online records may not reflect all internal correspondence, and so a conservation officer may have also reviewed other applications. For the 22 of the applications without a heritage dimension, where there was evidence of a conservation officer review, the site or property was located close to a heritage asset. In one further case (where the archaeological officer and conservation officer were one and the same) the site had a precedent for archaeological finds and so there was potential for more, but it was not formally an 'area of archaeological potential' as a local designation.
85. In four of the five planning applications where a locally listed asset was a consideration (non-designated heritage asset) there was evidence for conservation officer review and/or comment. These four applications were all granted planning permission. Further one of these four applications was also an Area of Archaeological Potential, and there is evidence of an archaeological officer review and/or comment for this application.
86. There was evidence that an archaeological officer reviewed and/or commented on 7% of all applications and 21% of applications with a heritage dimension. This level of engagement with an archaeological officer in planning applications which had a heritage dimension was relatively representative of the percentage of applications where an archaeological 'heritage dimension' was encountered (21% of applications with a heritage dimension). However, it is worth noting that there

was not a direct correlation between these applications: not all applications for which there was evidence of an archaeological officer review had a heritage dimension that was archaeological in nature, and vice versa. There is evidence that an archaeological officer reviewed 18 applications for which there was no archaeological 'heritage dimension', and in nine applications without an archaeological 'heritage dimension' there is no evidence of review by an archaeological officer.

87. An archaeological officer also reviewed and/or commented on the application in 2% of applications without a heritage dimension, based on the available evidence. These were instances where there was some archaeological interest or potential in the site, based on HER records, but the site had not been more formally designated as an important local archaeological area (a non-designated asset).

## Listed Building Consent Applications

88. While there is evidence that a conservation officer was consulted in the majority of cases (87%), a conservation officer does not seem to have reviewed and/or commented on all listed building consent applications. For the 12 applications where there is no evidence that a conservation officer was consulted in some cases they may have been, there was just no evidence of it online through the local planning authority public access website. In other cases, heritage was discussed and decided by the case officer based on evidence available to them. While a conservation officer would ideally review all applications for listed building consent applications, this is obviously not the case in practice whether due to workload or internally-agreed local authority practices.
89. The evidence available suggests that an archaeological officer was consulted on 11% of LBC applications; much less often than review or comment by a conservation officer. This is of course to be expected as listed buildings are primarily a conservation issue. There are examples where the archaeological significance of the building was a main factor for consideration e.g. one application where an archaeological building survey was conducted on recommendation by the archaeological officer. An archaeological officer was consulted when there was another archaeological dimension to the site and so a different heritage asset that could be impacted by the works proposed was also being assessed. In fact, for the ten cases where an archaeological officer was consulted, a conservation officer had also been consulted.

## Engagement with Historic England

### Planning Applications

90. Historic England should have been consulted for nine of the applications that were submitted (4% of applications with a heritage dimension, and 1% of the overall sample). However, based on the evidence available online, for three of these applications Historic England was apparently not consulted: one application relating to a scheduled monument; one for works to a Grade II\* listed building; and one for major construction works (area over 1,000 m<sup>2</sup>) in a conservation area. There were a further seven applications on which Historic England was, apparently, unnecessarily consulted.
91. A local conservation officer reviewed the application in two of the three applications where Historic England should have been consulted but was not. This would at least partly mitigate for the fact that Historic England was not consulted, as expert consideration was given to the impact which the application may have on the heritage asset but they did not benefit from valuable Historic England knowledge and expert input. All three applications were granted permission. For one application, a scheduled monument site, where neither Historic England nor a conservation officer reviewed the application, the decision may not have been fully informed.
92. Historic England responded in the 6% of applications with a heritage dimension (2% of applications overall) on which it was consulted.

## Listed Building Consent Applications

93. Historic England should have been consulted for the 16 applications that related to a Grade I or II\* listed building (17% of the applications). From the evidence available, Historic England were however apparently not consulted on one application which they should have been (relating to a Grade I listed building) and was consulted in a further seven where they did not need to be. As such, a greater clarification for local planning authorities of the Historic England notification process – specifically when notification is or is not required – would be worthwhile.
94. Historic England responded to all listed building consent applications on which it was consulted (24%).

## Additional Comments

### Planning Applications

95. Additional points of interest encountered in the applications reviewed were also recorded.

### Buffer Zones

96. Three of the applications submitted were within a World Heritage Site Buffer Zone. Although as “an area surrounding the nominated property which has complementary legal and/or customary restrictions placed on its use and development to give an added layer of protection” (UNESCO, 2017: 30, paragraph 104), since they serve as an extra layer of protection for the asset but are not actually part of the asset, just its surroundings, World Heritage Site Buffer Zones were not considered a ‘heritage dimension’ for the purposes of this study. Nonetheless, one application also had a ‘heritage dimension’ as defined in this research – the property was a Grade II\* listed building and was also within an archaeological protection site (a non-designated asset).
97. Likewise, ‘Buffer Zones’ implemented by some of the local planning authorities to protect other types of heritage asset through their surroundings were encountered but were not considered a ‘heritage dimension’ as determined for this study. In ten of the planning applications a 30m Listed Building Buffer Zone was applied as a protection by one of the local planning authorities. In another application to a different local planning authority there was a Conservation Area Buffer Zone applied. However, unlike World Heritage Buffer Zone sites, these are less official legal protections. They are locally defined, and are specific to the local planning authority where they are being used. Moreover, how they are determined is of some concern, as these delineations are based on a rather arbitrary spatial-definition of setting, e.g. a 30m area around the listed building. This may ultimately affect the level of consideration given to the impact of the proposed works on the heritage asset and its setting, as the parameters of ‘setting’, and so the determination of the extent of any harm, can not and should not be so easily drawn.
98. Further, for six of these applications there was another formal heritage asset serving as a more direct factor for consideration. It therefore seems unnecessary in these cases to apply this kind of protection, especially when there is another more official and less arbitrarily defined reason for protecting the local heritage present as a part of the planning process. A conservation officer was consulted in eight of the applications with a heritage buffer zone: in five of the six applications which also had a heritage dimension and in three where there was only 30m LB Buffer Zone. It is worth highlighting, however, that in these cases it did at the very least lead to a conservation officer review, even if on the other hand it may also lead to a complacency by caseworkers to take only this defined area as being important, with elements of setting beyond that not being considered, especially if a conservation officer is not then consulted.

### Retrospective Applications

99. A hundred of the planning applications submitted (12%) were retrospective applications – with works either started or completed before submission of the application. However, as 15 of these applications were for the removal or variation of condition(s), or were Minor Material Amendments to

previously approved planning applications (three with a heritage dimension), 85 full planning applications can actually be considered to have been made retrospectively (10% of planning applications). Of these, 19 applications had heritage dimension (22% of retrospective applications and 2% of planning applications in the sample). One application received a 'decline to determine' outcome but had no heritage dimension; 63 applications were granted planning permission (74% of retrospective applications), 16 of which had a heritage dimension (19% of retrospective applications and 84% of retrospective applications with a heritage dimension); and 21 were refused planning permission (25% of retrospective applications), of which three had a heritage dimension (4% of retrospective applications and 16% of retrospective applications with a heritage dimension).

## Archaeological Assessments

100. There was further evidence for consideration of archaeology in planning applications, and of the impacts on this from proposed developments by the applicants; with some evidence to suggest that NPPF policy requirements for archaeological assessments and surveys to be conducted are, in some cases, being met. The nature of these surveys and assessments were appropriate for the information being sought by the local planning authority and the relevant formats were subsequently provided by the applicant. Eight of the applications included an archaeological report(s) – including desk-based assessments, geophysics reports, and field evaluations. Six of these applications had a heritage dimension, and two did not. One application with a heritage dimension had no formally identified archaeological heritage dimension: the application was for a Grade II listed building in a conservation area, for which a desk-based archaeological assessment was completed. One further application included a Historic Building Assessment, and another submitted an archaeological standing building survey. The application which included the Historic Building Survey was for a Grade II\* listed building and the site was a locally designated archaeological protection zone. The application which included an Archaeological Standing Building Survey was for a Grade II listed building of which the survey was conducted.

## Listed Building Consent Applications

### Retrospective Applications

101. Eight (8.6%) of the listed building consent applications were made retrospectively, with the application being submitted either after the proposed work was started (four of the applications) or after it was completed (four of the applications). One application was in relation to a Grade I listed building, one to a Grade II\* listed building and six were for Grade II listed buildings. All of these listed building consent applications were granted permission, with six decided by the determination deadline.

## Archaeological Assessments

102. One application included an Archaeological Standing Building Survey alongside the application, in addition to a 'heritage statement'; another, a Historic Building Assessment, also in addition to a 'heritage statement'.



## Conclusions

- 103.** 861 planning applications were reviewed in this study. 26% of the planning applications had a heritage dimension as defined for this study. The most common heritage assets encountered were Conservation areas, Grade II listed buildings, and non-designated assets (mostly archaeological in nature). 93 listed building consent applications were also assessed.
- 104.** Heritage assets do not appear to have a negative impact on the outcome of planning applications: 91% of applications with a heritage dimension were granted planning permission, compared with 89% of planning applications overall; and 92% of listed building consent applications were granted permission.
- 105.** Indeed, 38 of the 42 applications with a heritage dimension that proposed a residential gain were granted planning permission: heritage was not preventing residential development.
- 106.** Moreover, 77% of planning applications with a heritage dimension and 84% of listed building consent applications met the determination deadline. Although 37% of the planning applications which were not determined on time had a heritage dimension, there is no explicit evidence to suggest that heritage played a part in the delay.
- 107.** The majority of planning applications were for construction works (84%; 77% of applications with a heritage dimension), specifically alterations or extensions to properties (67%; 61% of applications with a heritage dimension). Listed building consent applications most frequently included works to doors and windows (43% of applications), and internal alterations (47% of applications).
- 108.** Most applications reviewed, both for planning permission (72%) and for listed building consent (52%), were submitted by private individuals.
- 109.** 79% of planning applications (81% of planning applications with a heritage dimension) and 76% of listed building consent applications were made through an agent. This would indicate that guidance and relevant planning documentation should be targeted more towards the professionals who are fulfilling the role of agent in planning and listed building consent applications (not all of whom will have heritage expertise). Among the applications reviewed, the types of agent encountered include, but are not limited to, architects, estate agents, construction industry professionals, planning professionals, engineers, and large consultancy firms.
- 110.** 95% of listed building consent applications, and 49% of planning applications with a heritage dimension (13% of all planning applications sampled) included a statement on heritage. 31% of statements submitted with a planning application and 45% of statements on heritage submitted with listed building consent applications discussed the asset(s)'s significance, including any contribution to that significance made by its setting, sufficient to understand the potential impact of the proposal on its significance, and so met NPPF policy requirements in this regard.
- 111.** Five statements on heritage submitted with a planning application, and one with a listed building consent application explicitly reference use of the relevant Historic Environment Record.
- 112.** An agent was author of the statement on heritage in 63% of planning applications and 53% of listed building consent applications; a large proportion of the statements on heritage for which the author was identified.
- 113.** 47% of listed building consent applications had a concurrent related planning application, and 20% of planning applications with heritage dimension had a concurrent related listed building consent application. It would therefore be worthwhile to consider combining the two processes or providing related advice for such applications.
- 114.** There is evidence to suggest that 38% of planning applications with a heritage dimension, compared with 30% of planning applications overall, sought pre-application advice. In 51% of listed building consent applications there was evidence that the applicant sought pre-application advice. This would

suggest that there may be a greater need or at least a greater awareness of the need for pre-application advice in completing applications where heritage is a factor.

115. There was evidence to suggest that a conservation officer reviewed and/or commented on the application in 62% of applications with a heritage dimension, and in 87% of listed building consent applications. An archaeological officer reviewed and/or commented on 21% of planning applications with a heritage dimension and in 11% of listed building consent applications, based on the evidence available. A conservation officer had also reviewed and/or commented on all the listed building consent applications reviewed by an archaeological officer.
116. Historic England responded to all applications, for planning permission and listed building consent, on which it was consulted. However there were seven planning applications and seven listed building consent applications on which Historic England was unnecessarily consulted; and three planning applications and one listed building consent application on which Historic England should have been consulted but was not.
117. The findings highlighted in this report and the data contained in the spreadsheet have two main practical applications; in addition to providing a useful reference which can be used to highlight further areas of research interest, they can be used to inform any changes and recommendations to the planning and listed building consent applications decision-making process, particularly where heritage is a factor. The following are points for further consideration.
118. The lack of 'heritage statements' submitted for planning applications with a heritage dimension, and the large number of statements on heritage where submitted which did not wholly comply with NPPF policy, would indicate a need to revise advice on 'heritage statements' and to review who this should target for greater effectiveness.
119. Indeed, as an agent was most commonly writing the statement on heritage it would be useful to target those professionals who are providing this service. Moreover, for seven of the statements on heritage that were submitted alongside planning and listed building consent applications, the statement was provided in or across more than one document highlighting a need for greater clarification of when, where and how to include this information, so as to avoid unnecessary duplication of information, and to ensure that the correct information is provided.
120. Encouraging the submission of a statement on heritage in whichever format possible as long as the required information is included would be beneficial to ensure that these accompany applications where necessary, for example through desk-based archaeological assessments when included because where encountered in this study they met the NPPF policy requirement for this well, especially in cases where both would otherwise be required. It would certainly be worthwhile to encourage its inclusion as part of a Design and Access Statement where a Design and Access Statement is already required as part of the application.
121. Notably, guidance or clarification on what comprise 'heritage assets' would prove useful – as confusion over what should be discussed in statements on heritage occurred frequently enough to indicate that this is an issue.
122. There were some examples of unnecessary consultation of Historic England so a clarification and redress of local planning authority understanding for when this is required may prove worthwhile.

## Appendix 1: Questions in the Study Spreadsheet (HDiP.xls)

Question asked/data collected	Response options	Further details	Data sheet where recorded?
Local Planning Authority		Basic application information.	Both planning and LBC applications
Type of LPA	'Urban', 'Rural' or 'Mixed'	Criterion for selection of LPAs; interesting variable on which to assess heritage and decision-making.	Both planning and LBC applications
Application reference number		Basic application information.	Both planning and LBC applications
Decision, i.e. if the application was granted or not	'Granted' or 'Refused' (but, where encountered, other alternatives of note were also included)	Basic application information; does heritage impede development? Were the applications with a heritage dimension more, less, or equally as likely to be granted permission?	Both planning and LBC applications
Decision issue date	Date (from 01/04/2016 to 14/04/2016 and from 01/09/2016 to 14/09/2016)	Basic application information; criterion for selection of applications included.	Both planning and LBC applications
Address		Basic application information.	Both planning and LBC applications
Application validation date		Basic application information; used to determine how long it took for a decision to be made.	Both planning and LBC applications
'Decision made' date	N.B. for five of the LPAs (Tower Hamlets Council, Southampton City Council, East Cambridgeshire District Council, Sefton Council, and Mid-Devon District Council), a 'decision made' date was not readily available and the 'decision issued' date was instead used.		Both planning and LBC applications
Number of weeks taken for a decision to be made		Basic application information; recorded to determine if the decision was made on time or not (i.e. within the target determination time). Where an extension of time was agreed the target determination time was amended to reflect this, and a note of the change in date was made.	Both planning and LBC applications
Target determination time (in weeks)	'8' for LBC and standard planning applications or '13' for major applications		Both planning and LBC applications
Was the application determined on time?	'Yes' or 'No'	Basic application information; included to understand impact of heritage on application processes – does heritage have a negative impact on development/complicate and delay the application process?	Both planning and LBC applications

Question asked/data collected	Response options	Further details	Data sheet where recorded?
Is there a related planning/LBC application?	'Yes' or 'No'	Basic application information; recorded to allow for quantification of occurrence to determine value of simplifying process/twin-tracking.	Both planning and LBC applications
Works proposed	'Demolition', 'Construction', 'Change of use', 'Removal/variation of condition' or 'Other'	Basic application information; where more than one of the categories was applicable, the majority works or option with the greatest impact was selected; recorded to measure the nature of works proposed generally, but also those impacting heritage assets.	Planning applications only
Works proposed - If construction, nature of work?	'Alteration or extension', 'Separate new build', 'Replacement build' or 'Other'	Basic application information; included to provide more specific information as it is valuable to know extent of changes, particularly when considered in relation to applicant/application type.	Planning applications only
Application type	'Major', 'Minor commercial', 'Householder', 'Conservation Area Consent' or 'Other'	Basic application information; this was not recorded for Change of Use applications; included to provide details on extent/nature of impact, also for a more definitive idea of the audience HE should target with planning related information.	Planning applications only
Works proposed	'Demolition: total', 'Demolition: partial', 'Extension: major', 'Extension: minor', 'External decoration', 'External: other', 'Doors or windows', 'Renewable energy', 'Energy efficiency', 'Accessibility alterations', 'Restoration of historic features', 'Repair', 'Services', 'Internal: floor plan changes', 'Internal: other' or 'Curtilage'	Basic application information; more than one of the categories of work could be selected for any given application; included to determine nature of changes proposed to listed buildings.	LBC applications only
Applicant type	'Commercial', 'Individual (private)', 'Other' or 'Unclear/unknown'	Basic application information; included to provide details on extent/nature of impact, also for a more definitive idea of the audience HE should target with planning related information and guidance.	Both planning and LBC applications
Use of an agent	'Yes', 'No' or 'Unclear/unknown'	Basic application information; included to determine who is completing the application process, and so understand the audience HE should target with planning related information and guidance.	Both planning and LBC applications

Question asked/data collected	Response options	Further details	Data sheet where recorded?
Is there any evidence that pre-application advice was sought?	'Yes' or 'No'	Basic application information; recorded to measure how often applicants seek advice – are they (and how many are) making informed applications?	Both planning and LBC applications
Did the application propose a residential loss or gain?	'Yes – Gain', 'Yes – Loss' or 'No'	Basic application information; recorded to explore impact on development (in relation to government's 'growth and productivity agenda'), particularly of heritage.	Planning applications only
If a residential loss or gain was proposed, of how many units?		Basic application information; recorded to explore impact on development (in relation to government's 'growth and productivity agenda'), particularly of heritage.	Planning applications only
Did the application have a heritage dimension?	'Yes' or 'No'	Heritage content in application; recorded to measure the incidence of heritage in planning applications.	Planning applications only
If there was a heritage dimension to the application, what was the heritage asset(s)?	'World Heritage Site', 'Scheduled Monument', 'Grade I listed building', 'Grade II* listed building', 'Grade II listed building', 'Protected Wreck Site', 'Grade I Registered Park and Garden', 'Grade II* Registered Park and Garden', 'Grade II Registered Park and Garden', 'Registered Battlefield', 'Conservation Area' or 'Non-designated asset(s)'	Heritage content in application; recorded to measure composition of heritage assets affecting applications and determine nature of impact on applications. More than one asset could be selected. Formally recognised Archaeological Protection Zones or Areas of Archaeological Potential were recorded as part of the non-designated asset(s) category however archaeological sites and areas of archaeological interest not formally outlined by the LPA were not considered.	Planning applications only
Grade of listed building	'I', 'II*' or 'II'	Heritage content in application; recorded to measure composition of listed buildings in applications and also used to determine when HE consultation required.	LBC applications only
Type of listed building	'domestic (residential)', 'non-domestic', 'mixed', or 'structure' (e.g. a bridge).	Heritage content in application; recorded to determine use of listed Buildings comprising the sample. For this the existing use (rather than initial use when constructed, for example) was considered, unless the proposal involved a change of use in which case the proposed use was recorded.	LBC applications only

Question asked/data collected	Response options	Further details	Data sheet where recorded?
Did the application include a statement on heritage?	'Yes' or 'No'	Heritage content in application; where relevant, i.e. all listed building consent applications and any planning applications with a heritage dimension. In determining this, the format through which this information was provided did not matter (i.e. the document did not explicitly have to be 'heritage statement') and as long as a statement on heritage in any format was provided, the application was considered to have included a 'heritage statement'; included to determine whether or not this policy requirement is met by applicants	Both planning and LBC applications
If so, in what format was this statement submitted?	'Standalone 'Heritage Statement'', 'Integrated within the Design and Access Statement', 'Integrated within the Planning Statement', 'Included in cover letter' or 'Other'	Heritage content in application; recorded so as to determine where this information was most frequently included so as to inform guidance on statements of significance, particularly in relation to Design and Access Statements.	Both planning and LBC applications
Quality of statement on heritage	'1', '2', '3' or '4'	Heritage content in application; included to measure how clearly the NPPF policy requirement for 'heritage statements' submitted alongside planning and LBC applications is followed by applicants, where: <ul style="list-style-type: none"> <li>▪ '4' = The statement only acknowledged the heritage asset, and no further detail/assessment was provided;</li> <li>▪ '3' = A basic description of the heritage asset was provided, but no mention made of the asset(s)'s significance;</li> <li>▪ '2' = A basic description of the significance of the heritage asset was provided, including any contribution to that significance made by its setting, sufficient to understand the potential impact of the proposal on its significance; and</li> <li>▪ '1' = The statement gave a detailed description of the significance of the heritage asset, including any contribution to that significance made by its setting, sufficient to understand the potential impact of the proposal on its significance</li> </ul>	Both planning and LBC applications

Question asked/data collected	Response options	Further details	Data sheet where recorded?
Reference to relevant HER?	'Yes' or 'No'	Heritage content in application; inclusion of an explicit reference to the relevant HER being used for the completion of the 'heritage statement'. It is a policy requirement that as a minimum the HER should be consulted for statement on heritage, so included to determine where this was explicitly the case.	Both planning and LBC applications
Who was the author of the statement on heritage?	'Applicant', 'Agent', 'Heritage specialist (not the agent)', 'Other' (e.g. an architect) or 'Unclear/unknown'	Heritage content in application; included for an understanding of who the target audience for guidance on statements should be.	Both planning and LBC applications
Is there evidence that a conservation officer (representing the LPA) reviewed and/or commented on the application?	'Yes' or 'No'	Heritage content in application; recorded to get better understanding of decision-making processes in LPAs – are they making informed decisions where heritage is concerned?	Both planning and LBC applications
Is there evidence that an archaeological officer (representing the LPA) reviewed and/or commented on the application?	'Yes' or 'No'	Heritage content in application; recorded to get better understanding of decision-making processes in LPAs – are they making informed decisions where heritage is concerned?	Both planning and LBC applications
Is the application something on which Historic England should have been consulted?	'Yes' or 'No'	Heritage content in application; recorded to get better understanding of decision-making processes in LPAs – are they making informed decisions where heritage is concerned?	Both planning and LBC applications
Did we respond?		Heritage content in application; included to measure types of advice HE is providing.	Both planning and LBC applications
Additional comments		Any details which seemed relevant or of interest also recorded, e.g. the submission of desk-based archaeological evaluation, or the assignment of a site to a heritage asset buffer zone by the LPA.	Both planning and LBC applications

## Appendix 2: Search Terms and Sample Composition

Local Planning Authority	'Application Type' Search Term	Decision Date		Total
		01-14 April 2016	01-14 September 2016	
Derbyshire Dales District Council**	'Full Planning Permission'	25	19	47
	'Full Planning Permission (Reg 3)'	0	0	
	'Full Planning Permission (Reg 4)'	0	0	
	'Conservation Area Consent'	0	0	
	'Listed building consent (Alts/Ext)'	2	1	
	'Listed building consent (Demolitions)'	0	0	
East Cambridgeshire District Council	'Full Application'	25	33	72
	'Full Application - Regulation 3'	0	0	
	'Full Application - Regulation 3 - major'	0	0	
	'Full Application - Regulation 4'	0	0	
	'Full Major'	0	1	
	'Variation of condition Major application'	0	0	
	'Variation of condition'	1	1	
	'Conservation Area Consent'	0	0	
	'Listed building consent'	5	6	
Leeds City Council	'Full Planning Application'	134	149	302
	'Listed building Application'	9	10	
Tower Hamlets Council	'Full planning permission'	48	26	84
	'Conservation Area Consent'	0	0	
	'Listed building consent (S8 P&LBC 1990)'	8	2	



Local Planning Authority	'Application Type' Search Term	Decision Date		Total
		01-14 April 2016	01-14 September 2016	
Mid Devon District Council	'Full planning application'	16	18	64
	'Householder Application'	13	5	
	'Major Planning Application'	0	0	
	'Conservation Area Consent'	0	0	
	'Listed building consent'	6	6	
Northumberland County Council	'Full Application'	53	78	162
	'Full application with Env Statement'	0	0	
	'Conservation Area Consent'	0	0	
	'Listed building consent'	13	18	
Sefton Council	'Full Application'	16	20	90
	'Full application - major'	2	1	
	'Householder application'	19	29	
	'Listed building consent'	2	1	
	'Listed building consent - Demolition'	0	0	
Southampton City Council	'Full Application'	38	46	87
	'Listed building consent'	1	2	
Stafford Borough Council	'Full Application'	18	19	85
	'Householder'	24	18	
	'Conservation Area Consent_Demolition'	0	0	
	'Listed building consent_Alts & Extn'	4	2	
	'Listed building Demolition_Only'	0	0	

Local Planning Authority	'Application Type' Search Term	Decision Date		Total
		01-14 April 2016	01-14 September 2016	
Total		482	511	993

### Appendix 3: Local Planning Authority Profiles (information retrieved 22.11.2017)

	Tower Hamlets Council	Southampton City Council	Leeds City Council	East Cambridgeshire District Council	Sefton Council	Stafford Borough Council	Derbyshire Dales District Council**	Northumberland County Council	Mid Devon District Council
No. of (FTE) conservation officers within LPA	3	0.6	4	1	3	1.4	1	3	1.5
Category of authority	Urban	Urban	Urban	Mixed	Mixed	Mixed	Rural	Rural	Rural
Population	304,854	254,275	781,743	87,825	274,261	134,155	~45,000	316,002	79,789
Area	20 km <sup>2</sup>	50 km <sup>2</sup>	552 km <sup>2</sup>	651 km <sup>2</sup>	155 km <sup>2</sup>	598 km <sup>2</sup>	331.5 km <sup>2</sup>	5,014 km <sup>2</sup>	913 km <sup>2</sup>
No. of heritage assets									
No. of Listed Buildings	907	320	2348	972	565	832	1328	5608	2567
Grade I	21	13	46	48	1	22	36	174	48
Grade II*	38	19	101	55	20	70	98	268	161
Grade II	848	288	2201	869	544	740	1194	5166	2358
No. of Scheduled Monuments	8	40	57	50	13	42	63	974	49
No. of Registered Parks and Gardens	5	3	13	4	5	4	9	18	3
Grade I	0	0	2	0	0	2	0	3	0
Grade II*	1	2	2	1	2	1	3	3	1
Grade II	4	1	9	3	3	1	6	12	2
No. of Conservation Areas	58	20	76	28	25	30	33	69	50
No. of World Heritage Sites	1	0	0	0	0	0	1	1	0

	Tower Hamlets Council	Southampton City Council	Leeds City Council	East Cambridgeshire District Council	Sefton Council	Stafford Borough Council	Derbyshire Dales District Council**	Northumberland County Council	Mid Devon District Council
No. of Registered Battlefields	0	0	1	0	0	1	0	4	0
No. of assets on the Heritage at Risk Register	35	4	30	15	12	8	8	99	21
Buildings or Structures	22	2	15	0	2	2	3	32	2
Places of worship	7	1	3	0	3	0	3	8	1
Archaeology	1	0	6	15	1	3	2	54	15
Parks and Gardens	0	0	2	0	0	0	0	2	0
Battlefields	0	0	0	0	0	0	0	0	0
Wreck sites	0	0	0	0	0	0	0	0	0
Conservation Areas	5	1	4	0	6	3	0	3	3
Is there a local list?	Yes	Yes	No	Yes	No	No	No	No	Yes

\*\*For conservation and planning purposes the district is split, with the Peak District National Park Authority responsible for the parts of the district within the Peak District National Park. As such only data from those areas within the Derbyshire Dales District outside the Peak District National Park were collected as part of the study. This is also reflected in the appendix 3 dataset.

## References

ECORYS for Historic England. 2017. *Survey of Listed Building Owners*

2017. <https://historicengland.org.uk/research/current/social-and-economic-research/sector-insight/listed-building-owners-survey/>, last accessed 22.11.2017

UK Government, Department for Communities and Local Government. 2012. *National Planning Policy Framework*. <https://www.gov.uk/government/publications/national-planning-policy-framework--2>, last accessed 22.11.2017.

UK Government. 2013. *Article 4 – The Town and Country Planning (Development Management Procedure) (England) (Amendment) Order 2013*. <http://www.legislation.gov.uk/uksi/2013/1238/article/4/made>, last accessed 23.11.2017.

UNESCO. 2017. *Operational Guidelines for the Implementation of the World Heritage Convention*. <http://whc.unesco.org/en/guidelines/>, last accessed 22.11.2017.

### **Appendix 3 Data Sources:**

Office for National Statistics - Population data for mid-

2016: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland>, last accessed 22.11.2017

Heritage Counts 2017 – Local Authority Profiles: <https://historicengland.org.uk/research/heritage-counts/2017-conservation-areas/indicator-data/>, last accessed 22.11.2017  
Derbyshire Dales District Council: <http://www.derbyshiredales.gov.uk/planning-a-building-control/conservation>, last accessed 02.05.2018

Derbyshire Dales District Council Personal Communication



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