



Practice Note 1B

PREPARATION OF HERITAGE IMPACT STATEMENTS



This Practice Note explains what an Heritage Impact Statement (HIS) is, when and why one is needed, and the suggested format and level of detail that will be required.

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What is a Heritage Impact Statement?

An Heritage Impact Statement (HIS), sometimes also referred to as an Heritage Impact Assessment (HIA), describes the changes to a place that will result from a proposal, and evaluates the likely impacts that the changes will have on the place's historic cultural heritage significance (i.e., its 'heritage values').

The HIS addresses three basic questions:

- How will the proposed work impact on the 'historic cultural heritage significance' (i.e., heritage values) of a place?
- What measures (if any) are proposed to lessen any adverse impacts?
- Will the proposal result in any conservation benefits that could offset any adverse impacts?

The aim of preparing an HIS is to ensure that a proposal is prepared with appropriate regard for the heritage values of the affected place.

It differs from a Conservation Management Plan (CMP) in that it is focussed on the impacts of a particular proposal whereas a CMP provides guidance to manage a range of possible changes.

When is an HIS needed?

The Heritage Council or a planning authority may request or require that an HIS be prepared to demonstrate that adequate consideration has been given to the impacts of a proposal, and that appropriate steps have been taken to refine the design in response to the assessment. The request or requirement for an HIS is usually due to:

- The heritage significance of a place; and/or
- The nature or scope of proposed changes.

The process of preparing an HIS should inform the initial scope of a proposal and should further evolve through the design development phase, providing targeted advice on how heritage impacts may be minimised.

Minor works to a place of relatively low significance, for example a single-storey extension to the rear of a generic suburban house, may not require an HIS at all.

How is the significance of a place assessed?

It is recommended that planning for any substantial change to a heritage place is informed by an in-depth understanding of the place's heritage values. Typically, the entry for a place on a heritage list or heritage register will provide statements describing the significance of a place. A conservation management plan, if available, will also contain statements of significance. However, if the available statements are very brief or have been prepared a long time ago, it may be necessary for more detailed and current statements of significance to be prepared. This will involve historical research and study of the physical fabric of the place, as well as analysis of findings to see how they relate to understandings of cultural heritage significance.

It is important that an HIS is prepared using the same criteria as is used by the regulator that is making the decision.

A statement of significance should take into account the diversity of physical characteristics that may be important, including architectural composition and detail, colours, interior treatment and furnishing (i.e., heritage objects), vegetation and landscape, setting, boundaries, relationship with related places or objects, and contribution to streetscape or townscape. There may also be intangible values that are significant, such as an historic use or association.

It is often helpful to supplement a statement of significance for a place with a graphical illustration of the features that contribute, to a greater or lesser extent, to that significance. This may be done by marking up drawings in a way that shows the relative significance of different elements or features, spaces, and view corridors.



A significance assessment should consider the diversity of physical characteristics of a place that may be important. In some cases, a rear elevation may have considerable heritage significance.

What area should be covered?

The HIS should relate to the area in which heritage values are likely to be impacted. Where changes are contained within a building, it will be sufficient to only understand the heritage values of the affected building. For a proposal that will result in changes to a wide area, perhaps to the setting of neighbouring properties or even a townscape, the heritage values of all the affected places may need to be considered.

What is meant by 'significance'?

'Historic cultural heritage significance' is the term that the *Historic Cultural Heritage Act 1995* refers to as the characteristics, history and associations that make a place valued by a community for cultural reasons. Section 16 of the Act provides the criteria for assessing this significance.

The Australia ICOMOS *Burra Charter* uses the equivalent term 'cultural significance' which it defines as meaning "...aesthetic, historic, scientific, social or spiritual value for past, present or future generations. Cultural significance is embodied in the place itself, its fabric, setting, use, associations, meanings, records and related objects. Places may have a range of values for different individuals and groups."

Suggested structure for an HIS

1. Project name and background
2. Location/study area
3. Description of the proposal
4. Historical context (i.e., summarised history)
5. Heritage listings
6. Significance assessment
7. Evaluation of likely impacts on significance.
8. Response to Works Guidelines / Local Historic Heritage Code / CMP policies
9. Recommended mitigation measures
10. Justification for residual impacts (including the alternatives considered)
11. References

Report content

An HIS should be concise. It should address the three questions previously outlined under ‘What is a heritage impact statement’.

Once the heritage significance of the affected places is documented, and the relative significance of the component parts and spaces is understood, a proposal for change can be assessed for its likely impact on this heritage significance. It is helpful to carry out this impact assessment methodically in relation to each statement of significance (for each affected place if multiple places are involved). The impacts should be described as being positive or negative, and the magnitude of the impact should be described using terms such as ‘high’, ‘medium’, ‘low’, or ‘none’.

For proposals that are to be determined by the Heritage Council, the HIS should also evaluate the proposal to see how it aligns with the ‘appropriate outcomes’ described in relevant sections of the Tasmanian Heritage Council’s Works Guidelines. Similar to a planning scheme response, the ‘appropriate outcomes’ can be presented in a tabular form with a response written against the relevant criteria.

If a place has a conservation management plan (CMP), the HIS should include an evaluation of compliance with the relevant recommendations and policies of the CMP.

The conclusion of the HIS should provide an overall statement of impact, which reflects the magnitude of impacts in their totality and their effect on the sustainability of the place’s heritage significance. The conclusion should also examine whether the identified level of impact is justifiable in view of the relative necessity of the change, explaining why solutions having lower impact are not viable. It

should contain recommendations for impact mitigation, including design changes.

Design refinements

The process of preparing an HIS, and the conclusions that may be drawn from the process, may identify elements of a proposal that are unnecessarily detrimental to the place’s heritage significance. The opportunity should then be taken to address these impacts with design refinements.

Inclusion with development application

The inclusion of an HIS with a development application may be a requirement of the Tasmanian Heritage Council or a planning authority, or an applicant may choose to submit an HIS of their own volition. An HIS can demonstrate to the regulator that the heritage values of a place have been appropriately considered in the design process, and so provide support for a proposal. The HIS should contain copies of the design drawings and any other information on which its impact assessment is based.

Planning sequence involving an HIS

1. Research to understand significance (this is the first stage in the process, and the output should be provided to the designers)
2. Preliminary scope of work/sketch design
3. HIS
4. Design development
5. Revised HIS
6. Submission for approval

Who is best qualified to prepare an HIS?

The research and analysis required to prepare an HIS is likely to involve an assessment of a place’s heritage significance, the reading of proposal documentation, and the evaluation of likely impacts on the place’s heritage significance. This work will require knowledge, skill, and experience in a range of disciplines that may include history, archaeology, architecture, landscape design, and town planning. An understanding of contemporary practice in historic heritage management is also necessary in preparing an HIS. It is therefore advisable to employ experts with specialist knowledge in the disciplines most relevant to a particular proposal.

Further advice

If you have any follow-up questions about the information contained in this guide, or if you require any clarification about heritage impact statements, please contact Heritage Tasmania on 1300 850 332. Our advisory staff will be happy to assist you.

Useful Resources

Australia International Council on Monuments and Sites (ICOMOS)

The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance 2013 (the '[Burra Charter](#)'); Australia ICOMOS Inc.

Planning Institute of Australia

Heritage Impact Assessment for Planners, Ivan McDonald, 3 June 2014

<https://www.planning.org.au/documents/item/6385>

Australian State Heritage Agencies

Design in Context – Guidelines for Infill Development in the Historic Environment, NSW Heritage Office, 2006

<https://www.environment.nsw.gov.au/-/media/OEH/Corporate-Site/Documents/Heritage/design-in-context-guidelines-for-infill-development-historic-environment.pdf>

Heritage Impact Statement Guidelines for State Heritage Places, SA Department of Environment, Water and Natural Resources, 2013

Heritage Impact Statements Guidelines, Victorian Department of Transport, Planning and Local Infrastructure

Heritage Impact Statement: A guide, Heritage Council of Western Australia, 2020

<https://www.wa.gov.au/system/files/2021-05/HER-Heritage-Impact-Statement-A-Guide-2020.pdf>

Statements of Heritage Impact, NSW Heritage Office and Department of Urban Affairs & Planning, 1996

Historic England (formerly English Heritage)

Statements of Heritage Significance: Analysing Significance in Heritage Assets, 2019

<https://historicengland.org.uk/images-books/publications/statements-heritage-significance-advice-note-12/heag279-statements-heritage-significance/>

The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning, 2017

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

Advice Note 4: Tall Buildings

<https://historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/heag037-tall-buildings-v2/>

Print publications

Assessing Historic Heritage Significance for application with the Historic Cultural Heritage Act 1995, Heritage Tasmania, Version 6, October 2021.

Researching historic heritage places, Tasmanian Heritage Council & Heritage Tasmania, undated brochure.

Understanding historic heritage, Tasmanian Heritage Council & Heritage Tasmania, undated brochure.

Works Guidelines for Historic Heritage Places, Tasmanian Heritage Council, November 2015.