



# Statements of Heritage Impact

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## INTRODUCTION

This guideline has been prepared to assist people who wish to carry out work that could impact on a heritage item<sup>(1)</sup>. They will also assist councils who must consider whether to approve such development.

A statement of heritage impact (SOHI) is meant to convey what the impact or impacts of a proposal would be. When considered along with a policy or plan for conservation and management, an informed decision can be made whether to allow the development to proceed. This guideline explains what comprises a SOHI, when it is needed, and the level of detail to be provided.

The guideline supports the Heritage Council's view that a SOHI become a regular part of the approval process.<sup>(2)</sup> A SOHI might form part of a statement of environmental effects, a review of environmental factors or an environmental impact statement.

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(1) Heritage items can be buildings, structures, places, relics or other works of historical, aesthetic, social, technical/research or natural heritage significance. 'Places' include conservation areas, sites, precincts, gardens, landscapes and areas of archaeological potential.

(2) See *Altering Heritage Assets* in the NSW Heritage Manual.



## STATEMENTS OF HERITAGE IMPACT

### WHAT IS A STATEMENT OF HERITAGE IMPACT?

A SOHI, together with supporting information, addresses:

- why the item is of heritage significance
- what impact the proposed works will have on that significance
- what measures are proposed to mitigate negative impacts
- why more sympathetic solutions are not viable.

### WHEN IS A STATEMENT OF HERITAGE IMPACT NEEDED?

The Heritage Council requests that every development proposal it is required to consider be accompanied by a SOHI. Similarly, local councils and other development approval bodies are encouraged to require such a statement. This requirement could be viewed as a logical extension to a statement of environmental effects, which most councils commonly require.

### WHAT INFORMATION IS REQUIRED TO PREPARE A STATEMENT OF HERITAGE IMPACT?

Proposals need to be supported by information that will assist the council to make an informed decision. Where the work involved is minor, or involves an item of local significance, the SOHI can be based simply on a statement of significance or a conservation policy. However, for a complex proposal that affects an item of State significance, a more detailed conservation management plan would be required to support the application. The publications *Heritage Approvals* and *Conservation Management Documents* in the NSW Heritage Manual, explain what these various documents are and how to prepare them.

*Table 1* on pages 5 to 8, shows when a conservation management plan is needed for particular types of development, or when a conservation policy would suffice.

### WHAT NEEDS TO BE EXPLAINED BY THE STATEMENT?

A SOHI needs to explain how the heritage value of an item is to be conserved, or preferably enhanced, by the proposed development. This could involve stabilisation and repair work, restoration, reconstruction or redevelopment for a new use.

The Heritage Council does not advocate the reproduction of heritage forms and finishes; rather, it supports quality new design that is sympathetic in form and finish and is respectful of its context.

The steps to be taken should be noted and in doing this, it is helpful to refer to the seven criteria used to define heritage significance (criteria can be downloaded from the Heritage Office website) in order to explain how the item's heritage value is to be retained.

Where the effect of proposed work is likely to be detrimental to the heritage significance of the item or area, a SOHI needs to argue why such action is the only viable solution and explain why alternatives are not. The works that will have a negative impact should be listed, with statements made under each point as to why the impact/s cannot be avoided, and what steps have been taken to minimise their effect/s. It might also be useful to consider these in relation to the criteria of heritage significance.

*Table 1* outlines some of the questions that need to be answered in a SOHI for various types of development proposals.

### HOW IS THE INFORMATION TO BE PRESENTED?

The SOHI should be concise. Pertinent reports such as the statement of heritage significance, analysis of significance and, where they exist, conservation policies, conservation management plans, physical condition reports and any other specialist consultant reports, are simply referred to in the statement, then attached.

# Statement of Heritage Impact

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## A Model

**Statement of heritage impact for:**

*[Name of heritage item, item within a conservation area or site in the vicinity of a heritage item.]*

**This statement forms part of the statement of environmental effects for:**

*[A brief description of proposal.]*

**Date:**

**Reference:**

*[Reference number/s for the heritage item and/or conservation area (name the area), taken from LEP or REP schedule, or heritage study inventory.]*

**Address and property description:**

*[of heritage item, item within a conservation area or site in the vicinity of a heritage item.]*

**Prepared by:**

*[Name, address, phone and fax of author.]*

**For:**

*[Name of client or owner, where manager or owner*



*is not the author.]*

**The following aspects of the proposal respect or enhance the heritage significance of the item or conservation area for the following reasons:**

*[List in point form. List also, any other completed or proposed future works, such as the implementation of maintenance plans, interpretation strategies or archival recording.]*

**The following aspects of the proposal could detrimentally impact on heritage significance. The reasons are explained as well as the measures to be taken to minimise impacts:**

*[List the ways in which the item or area is significant and the way/s they could be affected; why the work is necessary for the ongoing viability; and, the steps taken to minimise negative impacts. (Consider addressing significance under each of the seven criteria used to define heritage significance)]*

**The following sympathetic solutions have been considered and discounted for the following reasons:**

*[List alternatives (especially those identified in a conservation management plan or other study) and clearly argue why these cannot be implemented.]*

**Attachments:**

*[List. For example, statement of heritage significance, study, State Heritage Inventory form, conservation policy or conservation management plan, building condition report, engineer's report and/or archaeologist's report.]*

**References:**

*[List. For example, heritage studies, conservation management plans, archaeological zoning plans, or environmental impact statements.]*

# Table 1

## Some Questions to be Answered in a Statement of Heritage Impact and Supporting Information Required

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The following are some of the questions that need to be answered in a statement of heritage impact. They offer guidance as to whether a conservation management plan, conservation policy or a statement of heritage significance would be necessary.

The following abbreviations are used in the table:  
**SOS** statement of heritage significance  
**CP** conservation policy  
**CMP** conservation management plan.

Depending on the degree of impact and the complexity of the proposal, in some circumstances the local council or Heritage Council may require a conservation management plan to be prepared for an item of local significance. (This would usually only be required for work that affects an item of State significance.)



# STATEMENTS OF HERITAGE IMPACT

**TABLE 1**

Proposed Change to Heritage Item	Some Questions to be Answered in a Statement of Heritage Impact	Minimum Supporting Information Required
<b>Demolition of a building or structure</b>	<ul style="list-style-type: none"> <li>• Have all options for retention and adaptive re-use been explored?</li> <li>• Can all of the significant elements of the heritage item be kept and any new development be located elsewhere on the site?</li> <li>• Is demolition essential at this time or can it be postponed in case future circumstances make its retention and conservation more feasible?</li> <li>• Has the advice of a heritage consultant been sought? Have the consultant's recommendations been implemented? If not, why not?</li> </ul>	<p><b>Local:</b> SOS</p> <p><b>State:</b> CMP</p>
<b>Minor partial demolition</b> (including internal elements)	<ul style="list-style-type: none"> <li>• Is the demolition essential for the heritage item to function?</li> <li>• Are important features of the item affected by the demolition (e.g. fireplaces in buildings)?</li> <li>• Is the resolution to partially demolish sympathetic to the heritage significance of the item?</li> <li>• If the partial demolition is a result of the condition of the fabric, is it certain that the fabric cannot be repaired?</li> </ul>	<p><b>Local:</b> SOS</p> <p><b>State:</b> CP</p>
<b>Major partial demolition</b> (including internal elements)	<ul style="list-style-type: none"> <li>• Is the demolition essential for the heritage item to function?</li> <li>• Are particular features of the item affected by the demolition (e.g. fireplaces in buildings)?</li> <li>• Is the detailing of the partial demolition sympathetic to the heritage significance of the item (e.g. creating large square openings in internal walls rather than removing the wall altogether)?</li> <li>• If the partial demolition is a result of the condition of the fabric, is it certain that the fabric cannot be repaired?</li> </ul>	<p><b>Local:</b> SOS</p> <p><b>State:</b> CMP</p>
<b>Change of use</b>	<ul style="list-style-type: none"> <li>• Has the advice of a heritage consultant or structural engineer been sought? Has the consultant's advice been implemented? If not, why not?</li> <li>• Does the existing use contribute to the significance of the heritage item?</li> <li>• Why does the use need to be changed?</li> <li>• What changes to the fabric are required as a result of the change of use?</li> <li>• What changes to the site are required as a result of the change of use?</li> </ul>	<p><b>Local:</b> SOS</p> <p><b>State:</b> CMP</p>



# STATEMENTS OF HERITAGE IMPACT

Proposed Change to Heritage Item	Some Questions to be Answered in a Statement of Heritage Impact	Minimum Supporting Information Required
<p><b>Minor additions</b> (see also minor partial demolition)</p>	<ul style="list-style-type: none"> <li>• How is the impact of the addition on the heritage significance of the item to be minimised?</li> <li>• Can the additional area be located within an existing structure? If no, why not?</li> <li>• Will the additions visually dominate the heritage item?</li> <li>• Is the addition sited on any known, or potentially significant archaeological deposits? If so, have alternative positions for the additions been considered?</li> <li>• Are the additions sympathetic to the heritage item? In what way (e.g. form, proportions, design)?</li> </ul>	<p><b>Local:</b> SOS</p> <p><b>State:</b> CP</p>
<p><b>Major additions</b> (see also major partial demolition)</p>	<ul style="list-style-type: none"> <li>• How is the impact of the addition on the heritage significance of the item to be minimised?</li> <li>• Can the additional area be located within an existing structure? If not, why not?</li> <li>• Will the additions tend to visually dominate the heritage item?</li> <li>• Are the additions sited on any known, or potentially significant archaeological deposits? If so, have alternative positions for the additions been considered?</li> <li>• Are the additions sympathetic to the heritage item? In what way (e.g. form, proportions, design)?</li> </ul>	<p><b>Local:</b> SOS</p> <p><b>State:</b> CMP</p>
<p><b>New development adjacent to a heritage item</b> (including additional buildings and dual occupancies)</p> <p><i>Note: Most planning instruments (such as local and regional environmental plans) require the approval authority to take into account the impact of new development on adjacent heritage items or conservation areas.</i></p>	<ul style="list-style-type: none"> <li>• How is the impact of the new development on the heritage significance of the item or area to be minimised?</li> <li>• Why is the new development required to be adjacent to a heritage item?</li> <li>• How does the curtilage allowed around the heritage item contribute to the retention of its heritage significance?</li> <li>• How does the new development affect views to, and from, the heritage item? What has been done to minimise negative effects?</li> <li>• Is the development sited on any known, or potentially significant archaeological deposits? If so, have alternative sites been considered? Why were they rejected?</li> <li>• Is the new development sympathetic to the heritage item? In what way (e.g. form, siting, proportions, design)?</li> <li>• Will the additions visually dominate the heritage item? How has this been minimised?</li> <li>• Will the public, and users of the item, still be able to view and appreciate its significance?</li> </ul>	<p><b>Local:</b> CP</p> <p><b>State:</b> CMP</p>



## STATEMENTS OF HERITAGE IMPACT

Proposed Change to Heritage Item	Some Questions to be Answered in a Statement of Heritage Impact	Minimum Supporting Information Required
<p><b>Subdivision</b></p> <p><i>Note: Impacts on heritage values related to new subdivision can often be minimised through development control plans (DCPs). Refer to the Best Practice Guideline on preparing DCPs published by the Department of Planning.</i></p>	<ul style="list-style-type: none"> <li>• How is the proposed curtilage allowed around the heritage item appropriate?</li> <li>• Could future development that results from this subdivision compromise the significance of the heritage item? How has this been minimised?</li> <li>• Could future development that results from this subdivision affect views to, and from, the heritage item? How are negative impacts to be minimised?</li> </ul>	<p><b>Local:</b> SOS</p> <p><b>State:</b> CMP</p>
<p><b>Repainting</b> using new colour schemes</p>	<ul style="list-style-type: none"> <li>• Have previous (including original) colour schemes been investigated? Are previous schemes being reinstated?</li> <li>• Will the repainting effect the conservation of the fabric of the heritage item?</li> </ul>	<p><b>Local:</b> SOS</p> <p><b>State:</b> CP</p>
<p><b>Re-roofing/re-cladding</b></p>	<ul style="list-style-type: none"> <li>• Have previous (including original) roofing/cladding materials been investigated (through archival and physical research)?</li> <li>• Is a previous material being reinstated?</li> <li>• Will the re-cladding effect the conservation of the fabric of the heritage item?</li> <li>• Are all details in keeping with the heritage significance of the item (e.g. guttering, cladding profiles)?</li> <li>• Has the advice of a heritage consultant or skilled tradesperson (e.g. slate roofer) been sought?</li> </ul>	<p><b>Local:</b> SOS</p> <p><b>State:</b> CP</p>
<p><b>New services</b> (e.g. air conditioning, plumbing)</p>	<ul style="list-style-type: none"> <li>• How has the impact of the new services on the heritage significance of the item been minimised?</li> <li>• Are any of the existing services of heritage significance? In what way? Are they affected by the new work?</li> <li>• Has the advice of a conservation consultant (e.g. architect) been sought? Has the consultant's advice been implemented?</li> <li>• Are any known or potential archaeological deposits (underground and under floor) affected by the proposed new services?</li> </ul>	<p><b>Local:</b> SOS</p> <p><b>State:</b> CP (CMP for a major services upgrade)</p>
<p><b>Fire upgrading</b></p> <p><i>Note: Where agreement cannot be reached between the local council and your consultants on suitable fire-upgrading you may seek the advice of the Fire, Access &amp; Services Panel, a subcommittee of the Heritage Council of NSW. Contact the Heritage Office for further information on (02) 9391 2115.</i></p>	<ul style="list-style-type: none"> <li>• How has the impact of the upgrading on the heritage significance of the item been minimised?</li> <li>• Are any of the existing services of heritage significance? In what way? Are they affected by the new work?</li> <li>• Has the advice of a conservation consultant (e.g. architect) been sought? Has their advice been implemented?</li> </ul>	<p><b>Local:</b> SOS</p> <p><b>State:</b> CP</p>

*Continued*



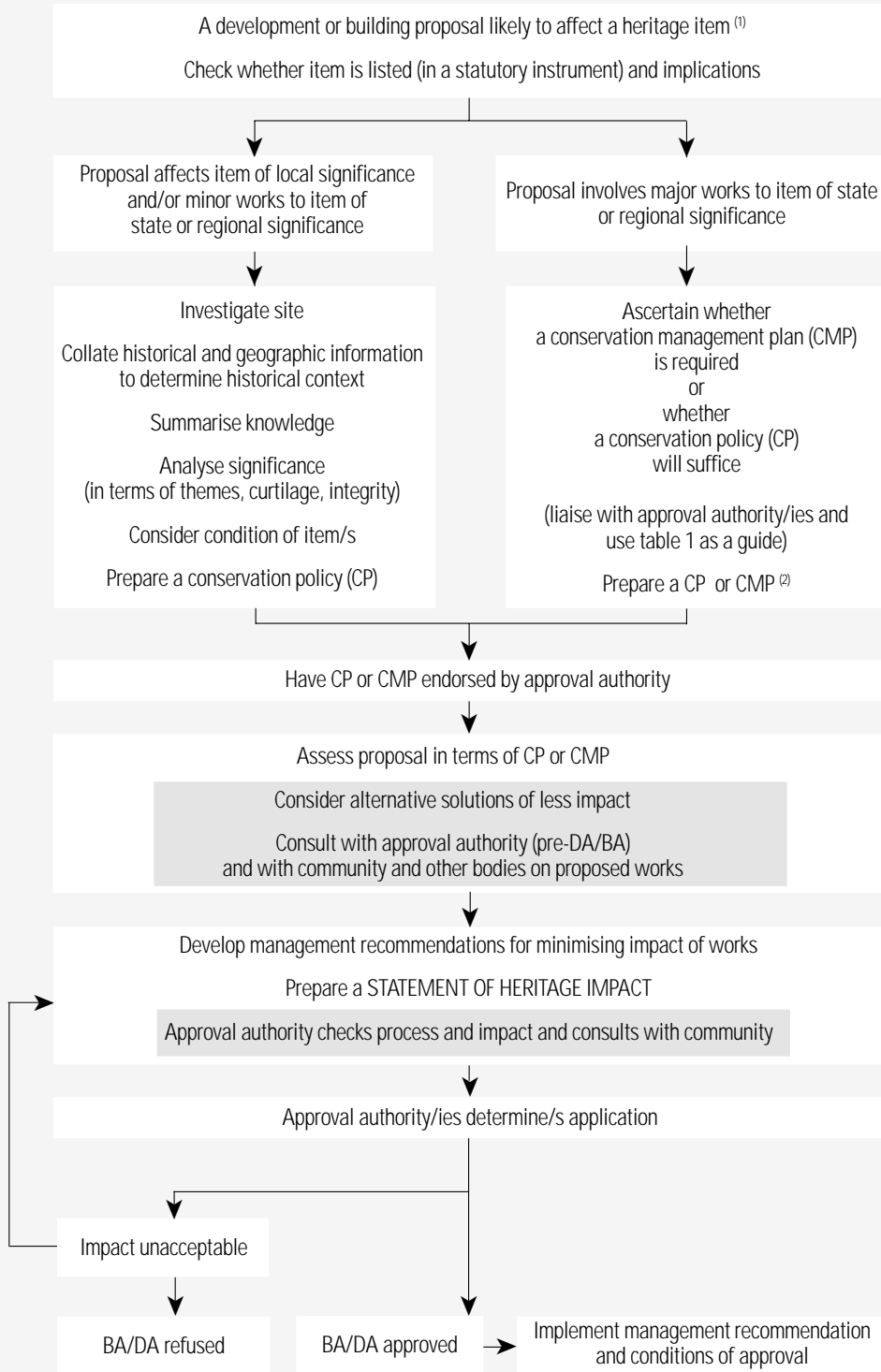


## STATEMENTS OF HERITAGE IMPACT

Proposed Change to Heritage Item	Some Questions to be Answered in a Statement of Heritage Impact	Minimum Supporting Information Required
<b>Fire upgrading</b> (continued)	<ul style="list-style-type: none"> <li>• Are any known or potential archaeological deposits (underground or under floor) affected by the proposed new services?</li> <li>• Has the advice of a fire consultant been sought to look for options that would have less impact on the heritage item? Will this advice be implemented? How?</li> </ul>	
<b>New landscape works and features</b> (including carparks and fences)	<ul style="list-style-type: none"> <li>• How has the impact of the new work on the heritage significance of the existing landscape been minimised?</li> <li>• Has evidence (archival and physical) of previous landscape work been investigated? Are previous works being reinstated?</li> <li>• Has the advice of a consultant skilled in the conservation of heritage landscapes been sought? If so, have their recommendations been implemented?</li> <li>• Are any known or potential archaeological deposits affected by the landscape works? If so, what alternatives have been considered?</li> <li>• How does the work impact on views to, and from, adjacent heritage items?</li> </ul>	<b>Local:</b> SOS  <b>State:</b> CMP (CP will suffice for minor works)
<b>Tree removal or replacement</b>  <i>Note: Always check the tree preservation provisions of your local council when proposing removal of trees</i>	<ul style="list-style-type: none"> <li>• Does the tree contribute to the heritage significance of the item or landscape?</li> <li>• Why is the tree being removed?</li> <li>• Has the advice of a tree surgeon or horticultural specialist been obtained?</li> <li>• Is the tree being replaced? Why? With the same or a different species?</li> </ul>	<b>Local:</b> SOS  <b>State:</b> CP
<b>New signage</b>  <i>Note: Check whether the local council has a signage policy or design guidelines</i>	<ul style="list-style-type: none"> <li>• How has the impact of the new signage on the heritage significance of the item been minimised?</li> <li>• Have alternative signage forms been considered (e.g. free standing or shingle signs). Why were they rejected?</li> <li>• Is the signage in accordance with section 6 , 'Areas of Heritage Significance', in <i>Outdoor Advertising: An Urban Design-Based Approach</i>?<sup>(1)</sup> How?</li> <li>• Will the signage visually dominate the heritage item/ heritage conservation area or heritage streetscape?</li> <li>• Can the sign be remotely illuminated rather than internally illuminated?</li> </ul>	<b>Local:</b> SOS  <b>State:</b> CP

(1) A joint publication by the Department of Planning (NSW) & Department of Planning and Housing (Victoria). Published by Department of Planning (NSW), Sydney, 1991.

## DEVELOPMENT AND BUILDING APPROVAL FLOW CHART



Note:  **Indicates public participation.**

(1) Items may be cultural landscapes, places, conservation areas, buildings, structures, relics or other work of heritage significance. They may be positioned on or adjacent to the development site

(2) See Conservation Management Documents in the NSW Heritage Manual for information on preparing policies and plans



