



Historic England

# Making Changes to Heritage Assets

Historic England Advice Note 2



# Summary

This advice note illustrates the application of the policies set out in the NPPF in determining applications for planning permission and listed building consent, as well as other non-planning heritage consents, including scheduled monument consent. It provides general advice according to different categories of intervention in heritage assets, including repair, restoration, addition and alteration, as well as on works for research alone, based on the following types of heritage asset: buildings and other structures; standing remains including earthworks; buried remains and marine sites; and larger heritage assets including conservation areas, landscapes, including parks and gardens, and World Heritage Sites. It will be useful to owners, developers, local planning authorities and others in considering works to heritage assets.

Making Changes to Heritage Assets was first published as part of the Planning Policy Statement 5 Practice Guide in 2010. This edition has been revised following consultation in 2015.

It is one of a series of Historic England Advice Notes  
<https://www.historicengland.org.uk/advice/planning/planning-system/>

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**Front cover:**

The reconstructed south oriel of St Edward's Presbytery at A W N Pugin's Grange in Ramsgate, Kent, originally built by his architect son, Edward Welby Pugin. It has been partially reconstructed following research, removing unsympathetic alterations made in the 1960s.

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# Introduction

- 1 The purpose of this Historic England Advice note is to provide information on repair, restoration, addition and alteration works to heritage assets to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment legislation, the policy in the National Planning Policy Framework (NPPF) and the related guidance given in the Planning Practice Guidance (PPG). In addition to these documents, this advice should be read in conjunction with the relevant Good Practice Advice and Historic England advice notes. Alternative approaches may be equally acceptable, provided they are demonstrably compliant with legislation and national policy objectives.
- 2 This advice promotes positive, well-informed and collaborative conservation, the aim of which is to recognise and reinforce the historic significance of places, while accommodating the changes necessary to ensure that people can continue to use and enjoy them. Change to heritage assets and their settings is, of course, acceptable where it is sustainable in terms of the NPPF; change is only unacceptable where it harms significance without an appropriate balance of public benefit.
- 3 The best way to conserve a building is to keep it in use, or to find it an appropriate new use if it has passed out of use, either that for which it was designed or an appropriate new use which would see to its long-term conservation. Even recently restored buildings that are vacant will soon start to degenerate. An unreasonable, inflexible approach will prevent action that could give a building new life; indeed it can eliminate that use. A reasonable and proportionate approach to owners' needs is therefore essential.
- 4 This advice note therefore illustrates the application of the policies set out in the NPPF in determining applications for planning permission and listed building consent, as well as other non-planning heritage consents, including scheduled monument consent. The examples given are not a substitute for the process of understanding the particular significance of the affected assets and the impact upon that significance in each case. Each heritage asset and group of heritage assets has its own characteristics that are usually related to an original or subsequent function. These can include orientation, layout, plan-form, setting, materials and construction, the disposition of openings, external detailing (with larger assets or groups of assets this might include street furniture and paving) and internal fittings.

- 5 The limits imposed by the structure and features of the asset are an important consideration, as is an understanding of the significance of individual elements, derived both from the physical evidence and documentary sources.
- 6 There are various legal requirements that buildings have to comply with, such as Building Regulations and the Equality Act 2010. Sometimes the best means of conserving a heritage asset will seem to conflict with the requirements of such regimes. It is good practice for local planning authorities to consider imaginative ways of avoiding such conflict. Where conflict is unavoidable, such regimes generally allow for some flexibility so that a balance can be struck.
- 7 Where change is proposed to a heritage asset, it can usually be characterised as:
- Repair
  - Restoration
  - Addition and alteration, either singly or in combination; and
  - Works for research alone
- 8 Ways of dealing with these types of intervention are considered for each of the following categories of heritage asset:
- Buildings and other structures
  - Standing remains including earthworks
  - Buried remains and marine sites, including evidence of past environmental change, landscapes now submerged in rivers, estuaries and coastal areas to the low-water mark
  - Large heritage assets including conservation areas, formal or informal landscapes at all scales, clusters of scheduled monuments, and World Heritage Sites, where the whole is greater than the sum of the parts
- Some heritage assets may fall into more than one category.

# 1 Repair

## General Points

- 9 With the exception of repairs to scheduled monuments, which will almost always need consent, minor repairs are unlikely to require planning permission or listed building consent (where relevant) if the works are carried out using the same materials and techniques and they do not affect the significance of the asset. Where certainty is needed by applicants, a Certificate of Lawful Proposed Works will assist. It is good practice for owners/applicants to seek their own advice; the local planning authority can advise.
- 10 Good conservation of heritage assets is founded on appropriate routine management and maintenance. Such an approach will minimise the need for larger repairs or other interventions and will usually represent the most economical way of sustaining an asset.

## Buildings and Other Structures

- 11 Original materials normally only need to be replaced when they have failed in their structural purpose. Repairing by re-using materials to match the original in substance, texture, quality and colour, helps maintain authenticity, ensures the repair is technically and visually compatible, minimises the use of new resources and reduces waste. However, alternative approaches may be appropriate if it can be demonstrated that the technique will not cause long-term damage to the asset and results in less overall loss of original fabric

and significance or demonstrates other major benefits. An example may be the use of resin or steel reinforcements to stabilise structural timbers without loss of historic fabric. Repairs to a listed building may require consent. One would expect that the loss of historic fabric following repairs and alteration would be proportionate to the nature of the works.

- 12 Replacement of one material by another may harm significance and will in those cases need clear justification. Therefore, while the replacement of an inappropriate and non-original material on a roof, for example, is likely to be easily justified, more justification will be needed for changes from one type of thatch, slate or tile to another, or for changes in the way the material is processed, applied and detailed.
- 13 Even when undertaking repair, care is needed to maintain the integrity of the asset. Some repair techniques, such as the use of cement-based mortars in place of softer lime, will affect the integrity of the existing building and cause permanent damage to the historic fabric, as well as being visually unsympathetic. Re-pointing of historic mortar will normally leave the significance of the asset unaffected, provided the original mix and appearance is copied but care is often needed not to affect subtle changes in pointing. A change in the character of the pointing, or painting exposed surfaces including concrete, can be visually and physically damaging and is likely to require listed building consent, as may a change in external paint colour.

**14** The removal of hard renders may cause more damage to the significance of the building than retention. In modern buildings cement render may be the original finish and in such cases it is appropriate for it to be retained and matched when repaired. Features such as tool marks, carpenters' marks, smoke blackening, decorative painting, pargetting or sgraffito work are always damaged by sand-blasting and sometimes by painting or other cleaning, as is exposed timber. Such treatments are unlikely to be considered as repairs and would normally require listed building consent.

**15** Doors and windows are frequently key to the significance of a building. Replacement is therefore generally advisable only where the original is beyond repair, it minimises the loss of historic fabric and matches the original in detail and material. Secondary glazing is usually more appropriate and more likely to be feasible than double-glazing where the window itself is of significance. As with the building as a whole, it is more appropriate to deal with timber decay and similar threats by addressing the cause of the decay rather than treating the symptoms but where remedial works are shown to be necessary, minimum interference to achieve reasonable long term stability is the most sustainable approach. The replacement of unsuitable modern windows with more historically appropriate windows is likely to be an enhancement.

**16** Repairs can sometimes have an impact on the archaeological interest of a heritage asset and may reveal new information relating to the significance of that asset. The recording of evidence revealed by such works may therefore be appropriate. Proportionate approaches to archaeological investigation are emphasised in Historic England Good Practice Advice note 2: Managing Significance in Decision-Taking in the Historic Environment, paragraph 17 - <http://www.historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/>.

## Standing Remains

**17** Beyond routine maintenance, required repairs are unlikely to be more than the addition of visually unobtrusive elements to give longer term protection, such as rough-racking or the soft capping of walls with turf, or a shelter coat of limewash or lead flashings, that can mitigate the effects of weathering and be replaced relatively regularly without affecting the earlier elements.

## Buried Remains, including Marine Sites

**18** Repairs may be required as part of a general management regime, but care will be needed to ensure that they do not cause damage to the significance of the asset (particularly its archaeological interest).

## Large Heritage Assets

- 19 The general principles apply. There are various approaches to managing complex heritage assets; more information is given on the Historic England website. Proactive forward management is essential to the effective conservation of large buildings and carefully planned and phased repair programmes may assist in the long-term management of such assets by spreading costs and reducing the chances of unexpected works becoming urgently necessary.
- 20 In respect of parks and gardens, repair will generally be part of ongoing management of the land. Maintenance conserves the original fabric in good order and safeguards design intentions; breaks in maintenance may lead to failure of elements and necessitate repairs or sometimes restoration. Accurate repair following decay is likely to be justified as a means of perpetuating the design if there is sufficient record of that design to inform the repair and if the elements (trees, plants or other parts of the fabric) and the techniques used are close and high quality matches to the original. For battlefields, which are generally managed agricultural land, repair is likely to take the form of small-scale interventions, eg maintaining walls, hedges or fences.

# 2 Restoration

## General Points

- 21** Restoration of a listed building requires its alteration and is therefore likely to need listed building consent and may also require planning permission. It is good practice for owners/applicants to seek their own advice; many local planning authorities will also be able to assist, very usefully at the pre-application stage.
- 22** The words repair and restoration are sometimes used interchangeably, particularly in popular usage and in terms of parks and gardens where restoration is often used with reference to what would be called repair for buildings.
- 23** Restoration may range from small-scale work to reinstate missing elements of decoration, such as the reinstatement of sections of ornamental plasterwork to a known design, to large schemes to restore the former appearance of buildings with the addition of major missing elements such as a missing wing. Previous repairs and/or alterations may be historically and architecturally valuable, and may provide useful information about the structure of the building, as will the recording of any features revealed by the work. New work can be distinguished by discreet dating or other subtle means. Overt methods of distinction, such as tooling of stonework, setting back a new face from the old or other similar techniques, are unlikely to be sympathetic.
- 24** Restoration is likely to be acceptable if:
- The significance of the elements that would be restored decisively outweighs the significance of those that would be lost
  - The work proposed is justified by compelling evidence of the evolution of the heritage asset and is executed in accordance with that evidence
  - The form in which the heritage asset currently exists is not the result of a historically-significant event
  - The work proposed respects previous forms of the heritage asset
  - No archaeological interest is lost if the restoration work could later be confused with the original fabric
  - The maintenance implications of the proposed restoration are considered to be sustainable
- 25** Restoration works are those that are intended to reveal or recover something of significance that has been eroded, obscured or previously removed. In some cases, restoration can thus be said to enhance significance. However, additions and changes in response to the changing needs of owners and occupants over time may themselves be a key part of the asset's significance.

26 In determining whether restoration is appropriate following catastrophic damage (e.g. from fire or flood) the practicability of restoration should be established by an assessment of remaining significance. Where the significance relates to a design concept or a particular event rather than held directly in the original fabric of the asset, restoration or replication is more likely to be acceptable.

## Buildings

27 Restoration involving the stripping-off of later layers of work or abrasive cleaning is only likely to be acceptable where it can be shown that:

- The later layers are not of significance in themselves
- They are damaging the original and other significant fabric, and
- By their removal there would be an enhancement to the significance of the building that outweighs the loss of the later addition

28 Stripping off finishes such as plaster to expose rubble, brick or timber-framed walls never intended to be seen is likely to have an adverse effect on the building's significance, aside from likely harm to the building's weathering ability, through the loss of historic materials and original finishes and harm to its aesthetic. Where it is proposed to remove more modern coverings that are harmful to the significance or the integrity of the building, appropriate materials will need to be introduced to ensure an authentic and/or suitably detailed finish is achieved, for example using mock jointing, or lining out, where there is evidence of this being the original finish. If there is any doubt as to the authentic finish, it is usually good practice to create a simple finish rather than one with speculative decoration. Sometimes

early framing or finishes were covered up because they were in a poor state and unacceptable loss of original fabric may result from works to make the earlier surface visually acceptable.

29 Many building types have much published information on appropriate restoration techniques. Timber-framed buildings, for example, have been well-researched and appropriate conservation approaches have been shown to work very well while minimising loss of original fabric and structural integrity. Secondary elements, such as the infilling of timber frames, are of value and their retention will maintain the integrity of the whole building. The reuse of original materials whenever possible will meet conservation and other sustainability objectives.

30 The legibility of names on war memorials is important and their re-cutting and/or re-painting in an appropriate manner are likely to be acceptable. For other inscriptions, conservation rather than restoration may be preferred, where the original script is significant.

31 If convincing evidence is available it may be appropriate to take opportunities to reinstate missing architectural details, such as balustrades and cornices or missing elements of a decorative scheme, using traditional methods and materials.

## Standing Remains

- 32 Restoration, as opposed to repair, may be appropriate where there is compelling evidence of the former state of the structure and demonstrable benefits to the significance of the standing remains would result. By weighing the merits against any harm caused, including to the archaeological interest, the acceptability of such an approach can be established.
- 33 The local planning authority will need to carefully balance the long-term benefits of bringing a ruined structure back into use with the loss of significance from the impact to the fabric that might result from restoration.
- 34 Restoration of elements to benefit the ongoing management and conservation of earthworks, such as infilling gaps in earth mounds, vegetation clearance or dealing with the effects of burrowing animals may be justified.

## Buried Remains including Marine Sites

- 35 Restoration of buried remains is unlikely to be acceptable. If the remains still form a structure (perhaps in the form of foundations), work to remove the soil overburden and expose the remains may be justified but will need to be balanced against the likely threat to the sustainability and archaeological interest of the asset. Leaving the site undisturbed is usually the preferred solution. Where the goal is to illustrate the past or educate, interpretation panels that illustrate the site's significance could provide a more appropriate solution.
- 36 For marine sites, repair and restoration for wreck structures are unlikely to form a significant part of their management but stabilisation and erosion protection strategies may be appropriate to sustain their integrity, taking into account the historic environment policies in the UK Marine Policy Statement under the Marine and Coastal Access Act 2009. Heritage Partnership Agreements may also be of assistance to ensure that the long-term future of the site is understood and, so far as is practicable, managed in the best interests of its conservation.

## Large Assets

- 37 An inconsistency of approach to repair and restoration because of its different ownerships, spatially or over time, or in methods and techniques may result in a loss of significance by obscuring the historic or aesthetic connection between elements within the asset and affect the evidential value of the asset as a whole. It may be possible to achieve consistency through a Listed Building Heritage Partnership Agreement or Local Listed Building Consent Order, or through a conservation management plan.
- 38 The spaces between the buildings within an area asset may be important and may be consciously designed (such as a town square); have developed over a period of time (such as parkland surrounding a country house); or be the space between similar assets with some other link, such as a variety of earthworks on downland. Restoration of individual elements within a group of assets is more likely to enhance the group if the effect on the other assets has been considered from the outset. Restoration of a designed space is more likely to meet the NPPF criteria, especially where there is public benefit, for example in the re-creation of the historic street pattern, including widths of streets and plots and heights of buildings and storeys, following the removal of a later development that was unsympathetic to the urban grain. The case for restoration will be stronger where it can be shown that the restoration improves the appreciation of the space and the settings of the assets that are linked to it.
- 39 Restoration may be appropriate in historic parks and gardens where the original design has been obscured despite regular maintenance and where it is possible to establish the original design through research and investigative work, and the work does not diminish the significance of the asset.
- 40 The significance of historic battlefields will usually result from evidential and associative value that depends on the ability to appreciate the location, topography and setting of the site. Restoration may involve removing later additions and features or reinstating known earlier features. The sensitivity of any archaeological interest in the site will be important when considering whether any restoration is appropriate.

# 3 Addition and Alteration

## General Points

- 41** The main issues to consider in proposals for additions to heritage assets, including new development in conservation areas, aside from NPPF requirements such as social and economic activity and sustainability, are proportion, height, massing, bulk, use of materials, durability and adaptability, use, enclosure, relationship with adjacent assets and definition of spaces and streets, alignment, active frontages, permeability and treatment of setting. Replicating a particular style may be less important, though there are circumstances when it may be appropriate. It would not normally be good practice for new work to dominate the original asset or its setting in either scale, material or as a result of its siting. Assessment of an asset's significance and its relationship to its setting will usually suggest the forms of extension that might be appropriate.
- 42** The historic fabric will always be an important part of the asset's significance, though in circumstances where it has clearly failed it will need to be repaired or replaced; for instance, seaside piers, constructed in timber and iron in a very hostile environment, will only survive through replication of corroded elements and mass-produced components in some C20 buildings, such as steel-framed windows, may not be simple to repair and repair would therefore be disproportionate. In normal circumstances, however, retention of as much historic fabric as possible, together with the use of appropriate materials and methods of repair, is likely to fulfil the NPPF policy to conserve heritage assets in a manner appropriate to their significance, as a fundamental part of any good alteration or conversion. It is not appropriate to sacrifice old work simply to accommodate the new.
- 43** The junction between new work and the existing fabric needs particular attention, both for its impact on the significance of the existing asset and the impact on the contribution of its setting. Where possible it is preferable for new work to be reversible, so that changes can be undone without harm to historic fabric. However, reversibility alone does not justify alteration; If alteration is justified on other grounds then reversible alteration is preferable to non-reversible. New openings need to be considered in the context of the architectural and historic significance of that part of the asset and of the asset as a whole. Where new work or additions make elements with significance redundant, such as doors or decorative features, there is likely to be less impact on the asset's aesthetic, historic or evidential value if they are left in place.

## Buildings and Structures

- 44 When a building is adapted for new uses, its form as well as its external and internal features may impose constraints. Some degree of compromise in use may assist in retaining significance. For example, headroom may be restricted and daylight levels may be lower than usually expected.
- 45 The plan form of a building is frequently one of its most important characteristics and internal partitions, staircases (whether decorated or plain, principal or secondary) and other features are likely to form part of its significance. Indeed they may be its most significant feature. Proposals to remove or modify internal arrangements, including the insertion of new openings or extension underground, will be subject to the same considerations of impact on significance (particularly architectural interest) as for externally visible alterations.
- 46 The sub-division of buildings, such as threshing barns and churches, that are significant for their open interiors, impressive proportions and long sight lines, may have a considerable impact on significance. In these circumstances the use of pods or other design devices that allow the entirety of the space to be read may be appropriate.
- 47 The introduction of new floors into a building or removal of historic floors and ceilings may have a considerable impact on an asset's significance. Certain asset types, such as large industrial buildings, are generally more capable of accepting such changes without unacceptable loss of significance.
- 48 The insertion of new elements such as doors and windows, (including dormers and roof lights to bring roof spaces into more intensive use) is quite likely to adversely affect the building's significance. Harm might be avoided if roof lights are located on less prominent roof slopes. New elements may be more acceptable if account is taken of the character of the building, the roofline and significant fabric. Roof lights may be more appropriate in agricultural and industrial buildings than dormers. In some circumstances the unbroken line of a roof may be an important contributor to its significance.
- 49 New features added to a building are less likely to have an impact on the significance if they follow the character of the building. Thus in a barn conversion new doors and windows are more likely to be acceptable if they are agricultural rather than domestic in character, with the relationship of new glazing to the wall plane reflecting that of the existing and, where large door openings are to be glazed, with the former doors retained or replicated so that they can be closed.
- 50 Small-scale features, inside and out, such as historic painting schemes, ornamental plasterwork, carpenters' and masons' marks, chimney breasts and stacks, inscriptions and signs, will frequently contribute strongly to a building's significance and removing or obscuring them is likely to affect the asset's significance.
- 51 Historic flooring materials will often be of interest in themselves. Additional care is needed on lower floors to ensure that archaeological interest below the finished surface is not adversely affected by proposed works.

- 52 Although some works of up-grading, such as new kitchens and bathroom units, are unlikely to need consent, new services, both internal and external, can have a considerable, and often cumulative, impact on the significance of a building and can affect significance if added thoughtlessly. The impact of necessary services can be minimised by avoiding damage to decorative features, by carefully routing and finishing and by use of materials appropriate to the relevant period, such as cast iron for gutters and down-pipes for many Georgian and Victorian buildings. Certificates of Lawful Proposed Works, Local Listed Building Consent Orders and Listed Building Heritage Partnership Agreements may all be useful mechanisms to clarify where the limits of permissibility exist in individual cases.
- 53 Removal of, and change to, historic shopfronts may damage the significance of both the building and the wider conservation area, as may the introduction of new shopfronts to historic buildings where there are none at present. All elements of new shopfronts (stall-risers, glazing, doors, fascias, etc.) may affect the significance of the building it is located in and the wider street setting. External steel roller shutters are unlikely to be suitable for historic shopfronts. Laminated glass and internal chain-link screens are likely to be more appropriate alternatives in most instances.
- 54 Where the proposal involves a change of use, particularly to single or multiple residential units, local planning authorities may consider that the impact on the building and its setting of potential future permitted development, such as conservatories, garden sheds and other structures associated with residential use, make the change of use proposal unacceptable in principle. Conditions preventing or limiting such future permitted development may make the change of use proposal acceptable.
- 55 Buildings will often have an important established and historic relationship with the landscaping that exists or used to exist around them. Proposals to alter or renew the landscaping are more likely to be acceptable if the design is based on a sound and well-researched understanding of the building's relationship with its setting, both now and in the past.

## Standing Remains and Buried Remains including Marine Sites

56 New work and alterations are likely to be rare. There may be cases where a new structure enables the long-term care of the original asset or its interpretation and conservation, or where alterations may assist the long-term conservation of the asset. Works other than those of a minor nature are likely to be acceptable only where they would be in the best long-term interests of the conservation of the remains or there are other important planning justifications. Any additions or alterations to marine sites or sites affecting the marine area must be made in accordance with the UK Marine Policy Statement and relevant Marine Plan.

## Large Assets

57 The same principles will apply, where appropriate, as those set out for buildings, standing remains, buried remains, marine sites and landscapes. The retention and restoration of surfacing and street furniture sometimes makes a very positive contribution to the character and appearance of a conservation area. Quality of place can be enhanced where opportunities are taken for the re-introduction of missing elements in adjacent areas, if there is historical evidence for them. The local tradition in scale, materials, texture, colour and laying patterns will inform appropriate new paving, with the traditional relationship between footways and carriageways retained. Traffic management measures can be integrated into the historic environment effectively by retaining features such as walls, trees, hedges and railings and horizontal and vertical alignments and surfaces such as cobbles and stone setts which naturally calm speeds. Where new features are introduced the observance of existing design principles and use of local traditional materials will ensure they do not appear intrusive.

58 The varying degrees of sensitivity to change within landscapes can normally be identified and incorporated into alterations and additions in ways that will enhance the asset's significance. However, a small minority of landscapes will be so sensitive that the degree of alteration or addition possible without loss of significance may be very limited, particularly where there is a consistently high level of archaeological interest or architectural consistency.

## Works for Research Alone

- 59 A research investigation involving intrusive works to an asset requiring permission or consent is sometimes proposed as a stand-alone project and not merely as an exercise in investigating an asset that will be lost or altered for other reasons. It may be justified if there will be a public benefit gained if the investigation results in an increased understanding of our past and this will be maximised if it is well planned, executed and the results properly publicised and disseminated. Information on how to secure the best results from an investigation is set out in Good Practice Advice note 2 (Managing Significance in Decision-Taking in the Historic Environment). For further information see also Understanding Historic Buildings: Policy and Guidance for Local Planning Authorities, (2008) - <https://content.historicengland.org.uk/images-books/publications/understanding-historic-buildings-policy-and-guidance/understanding-historic.pdf/>.
- 60 Any intrusive investigation may reduce the significance of an asset and impair the available resource for future archaeological investigation. It may also affect the historic and aesthetic values of the asset. Factors worthy of consideration when looking at the balance of the public benefit from the investigation and that loss of significance include:
- whether at least part of the investigation can be achieved using non-destructive techniques
  - whether the understanding sought could be found elsewhere, perhaps from another site where destruction is inevitable
  - the likelihood of the investigation yielding critical evidence to our understanding of the past
  - whether the increase in public knowledge decisively outweighs any damage to the asset in question
  - a skilled team with the resources to implement a project design based on explicit research objectives; and
  - the predicted rate of environmental decay of the asset
- 61 Metal-detecting on a scheduled monument for any reason requires a licence and intrusive investigation for research purposes will require scheduled monument consent. Further guidance is published by DCMS and advice can be sought from Historic England.

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