

Planning Practice Note: Heritage Impact Assessments and the setting of heritage assets



2nd Edition January 2026

Contents

Part 1 Introduction	2
Part 2 Use and format of HIA.....	4
Part 3 Assessment methodologies	5
Part 4 Identifying assets, assessing the contribution made by setting to significance	7
Part 5 Making assessments, drawing conclusions	12
Appendix A Glossary of Acronyms	20

Part 1 Introduction

Background

1. The heritage policies of the *London Plan 2021*, namely HC1 and HC2, supported by D3 in relation to design, and D9 in relation to tall buildings, along with the *National Planning Policy Framework (NPPF)*¹ provide an effective policy framework for managing the impacts of new developments on the significance of heritage assets.
2. These policies are supported by guidance from Historic England, most relevantly *Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning: 2* (Historic England, 2015) (GPA2), *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (Second Edition) (Historic England, 2017) (GPA3) and *Tall Buildings: Historic England Advice Note 4* (Historic England, 2022) (HEAN4).

Aims

3. The GLA's aims in this Practice Note are:
 - to set out good practice recommendations to inform the preparation of Heritage Impact Assessments for “relevant proposals” to address the impacts of development on the significance of heritage assets, including any contribution made by their settings and;
 - to achieve an appropriate separation of the assessment of heritage impacts from other planning considerations including townscape and visual impact assessment.

Status

4. This Practice Note sets out what the GLA's considers to comprise good practice. It is advice, not planning policy or London Plan Guidance. The primacy of legislation, NPPF, the PPG², and the policies of the relevant development plan, including *The London Plan* is acknowledged.

Scope and definitions

5. This note is focused on what the GLA's considers to be the appropriate methodology

¹ In this note, references to the NPPF are to the December 2024 version.

² References to the national Planning Practice Guidance are to the version available online in December 2025.

for the assessment, as part of planning decision-making, of the impacts of “relevant proposals” on the significance of heritage assets through changes to their settings. Except as specifically discussed below, this note does not include advice in relation to environmental impact assessments and Environmental Statements.

6. “Relevant proposals” are all planning applications which both:
- are referable to the Mayor of London; and
 - may have impacts on the significance of heritage assets (including World Heritage Sites) including from the contribution made by their setting.

The guidance set out in this note should also be applied to pre-application engagement in respect of “relevant proposals”.

7. In this document, in line with *The London Plan*, the abbreviation HIA is used for a Heritage Impact Assessment.³ A glossary of acronyms is provided at Appendix A. While it is noted that “impacts” relate to the change made and “effects” to the results of that change, the terminology of Heritage Impact Assessment is retained, since it relates to common professional usage and the terminology of *The London Plan*.

Audiences and uses

8. This Practice Note will be:
- used by the GLA in its assessment of relevant proposals;
 - promoted by the GLA for use by Local Planning Authorities in their own assessment of relevant and other proposals, as good practice advice;
 - promoted by the GLA for use by applicants and their consultants in the preparation of planning applications and supporting documents for relevant proposals;
 - promoted by the GLA for use by the relevant industry bodies, in particular the Landscape Institute, the Institute of Sustainability and Environmental Professionals, the Institute for Historic Building Conservation and the Chartered Institute for Archaeologists, in their advice to members, where such bodies are concerned with the heritage impacts of relevant proposals.

³ It is noted that the acronym HIA can also refer to a Health Impact Assessment in an EIA context. In the rare case of likely confusion, it is suggested that the term Heritage Impact Assessment be used in full. An HIA may also be named a Heritage Statement. The term HIA is preferred by the GLA since it is The London Plan term used in Policy HC2.

Review

9. The First Edition of this note was published in January 2024. The note was revised in the light of input from industry and other stakeholders. This Second Edition of the Practice Note was agreed by the Deputy Mayor on 20th November 2025 and replaces the First Edition. It will be kept under review having regard to any material changes in legislation, policy, guidance and new case law.

Part 2 Use and format of HIA

Use

10. Heritage Impact Assessments add most value when:
 - integrated into normal working practice as a process (rather than focussing on a document);
 - that process is iterative, allowing the results of HIA to input to the design and development of a scheme as it evolves;
 - started alongside early consideration of a proposal.

Format

11. An important aim of this practice note is to ensure that the assessment of heritage impacts is not conflated with other impact assessments (such as townscape and visual impacts). Whichever of the three formatting options (in Paras 12 and 13 below) are used, the HIA should:
 - not conflate the assessment of heritage impacts with other impact assessments (such as townscape and visual impacts); use appropriate approaches and methodologies;
 - express the assessment of heritage impacts in the language of the NPPF;
 - follow the other good practice advice set out and referred to in this note.
12. Where the historic environment is scoped into the EIA and the proposals require an Environmental Statement, the HIA should form a separate assessment. Two approaches are possible in terms of format:
 - The HIA may form an appendix to the ES. The main ES may then contain a chapter summarising the findings of the Appendix and setting out heritage impacts in accordance with the requirements for and language of an ES. This is the GLA's preferred approach.
 - The HIA may be located within the main ES chapter (for example the Heritage, Townscape and Visual Impact Assessment or Built Heritage, Townscape and Visual Impact Assessment). Where this approach is followed, the distinction between the HIA and ES assessments should be made clear.

13. Where the proposals do not require an Environmental Statement, the HIA should form a separate assessment from other non-heritage assessments. It may, if desired, form a chapter or section in a wider document which considers townscape and visual impacts (e.g. in an HTVIA or BHTVIA) but the distinction between heritage impacts and townscape and visual impacts should be clear.

Expertise

14. HIAs must show the use of the necessary and appropriate expertise.⁴ HIAs should be written by authors who are heritage professionals, with relevant heritage qualifications, competence and experience and this should be demonstrated by a brief biography containing details of the relevant expertise, qualifications and competence of the individual author(s).
15. Current full membership of the Institute for Historic Building Conservation (IHBC) or Chartered Institute for Archaeologists (CIfA) may be indicative of the necessary and appropriate expertise, although a demonstrably similar level of qualification, experience and competence may be appropriate. The GLA considers that the use of consultants with landscape or urban design qualifications and expertise alone, to assess heritage impacts on the significance of heritage assets, is not appropriate and does not comply with NPPF requirements.⁵

Part 3 Assessment methodologies

Introduction

16. There is a range of available guidance and good practice advice to support assessment. The GLA considers that GPA3 (see below) forms over-arching primary advice which is likely to be relevant to all cases. Some other advice, listed below, is helpful as secondary guidance relating to particular situations. Other advice, discussed below, is not relevant and should not be used in this context.

The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) (Historic England, 2017) (GPA3)

17. The GLA endorses the methodology and approach set out in *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (Historic England, 2017) (GPA3). HIAs should make clear and evidenced use of the approach

⁴ NPPF Para 207.

⁵ NPPF Para 207 requires the use of “appropriate expertise” in the assessment of heritage assets.

and methodology of GPA3.

Tall Buildings: Historic England Advice Note 4 (Second Edition) (HEAN4)

18. Relevant proposals often comprise or include tall buildings. HIAs which concern tall buildings should make clear and evidenced use of the approach and methodology of HEAN4.

Principles of Cultural Heritage Impact Assessment in the UK (PCHIA)

19. *Principles of Cultural Heritage Impact Assessment in the UK* (IEMA, IHBC and CIFA, 2021), provides a useful set of principles, particularly in relation to environmental impact assessment. If used as part of an HIA, use should also be made of the methodology and approach of GPA3 in assessment, which fits comfortably within the principles.

Guidance and Toolkit for Impact Assessments in a World Heritage Context

20. The PPG provides detailed guidance in relation to WHSs at Paras 026 to 038, stating at Para 035 that “Applicants proposing change that might affect the Outstanding Universal Value, integrity or authenticity of a World Heritage Site through development within the Site or affecting its setting (including any buffer zone or equivalent) need to submit sufficient information with their applications to enable assessment of the potential impact on Outstanding Universal Value.” London Plan Policy HC2 requires that proposals affecting the significance of WHSs should be supported by Heritage Impact Assessments, including an assessment of cumulative impacts. *London’s World Heritage Sites: Guidance on Settings Supplementary Planning Guidance* (published in 2012) provides guidance on the implementation of London Plan Policy HC2. This operates in tandem with the *WHS Management Plans* and *Settings Studies* adopted in relation to each of the four sites.
21. Policy HC2 directly addresses UNESCO’s position that HIA is essential for development proposals affecting the OUV of World Heritage Sites, as set out in its *Operational Guidelines for the Implementation of the World Heritage Convention* (Paragraphs 110, 118bis). HIAs should use the *Guidance and Toolkit for Impact Assessments in a World Heritage Context* (UNESCO, ICCROM, ICOMOS and IUCN, 2022) in the assessment of relevant proposals which may affect the significance of World Heritage Sites, the attributes, integrity or authenticity of their Outstanding Universal Value, or the ability to appreciate it. The use of this guidance can easily be integrated into wider heritage assessment as required under the NPPF to inform holistic assessment of the historic environment. (The GLA does not support the use of this guidance in contexts other than WHSs).

Methodologies which are not relevant for HIAs

22. The methodology contained within *The Design Manual for Roads and Bridges LA 101, LA 102, LA 103, LA 104 and LA106 Cultural heritage assessment* (Highways England and others, 2020) was written for the assessment of impacts of transport-related proposals on the contribution significance of heritage assets. The Design Manual for Roads and Bridges is not appropriate guidance for the assessment of relevant proposals and should not be used as such.
23. *Guidelines for Landscape and Visual Impact Assessment GLVIA3* (LI and IEMA, 2013, 3rd Edition, GLVIA3) is not guidance for use in HIAs and should not be used as such.⁶

Part 4 Identifying assets, assessing the contribution made by setting to significance

Introduction

24. This part of the Practice Note relates to the following GPA3 steps:
 - Step 1: Identify which heritage assets and their settings are affected and
 - Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated.

Consulting the historic environment record (HER)

25. In London the HER is the Greater London Historic Environment Record (GLHER).⁷ A full GLHER search should be made. Where a search has been made more than six months before planning submission, the data currency should be checked with the GLHER before submission and updated if necessary.
26. HIAs must provide evidence that the GLHER has been consulted.⁸ The HIA should include the reference number of the consultation and a copy of the relevant GLHER map with a legend and key.

⁶ See GLVIA3 Paras 5.11, 6.5 and 8.4 for example.

⁷ The GLHER is managed by Historic England's Greater London Archaeological Advisory Service (GLAAS) on behalf of the London boroughs and the Corporation of London. This holds extensive archaeological data, additional information on some designated assets and increasingly comprehensive recording of non-designated heritage assets.

⁸ NPPF Para 207.

Scoping heritage assets

27. HIAs must proportionately include as part of the assessment all heritage assets which may be impacted by the proposals, including Non-Designated Heritage Assets which have been identified as such (including as locally listed assets) by the Local Planning Authority.⁹ The aim is to include in the HIA all heritage assets where there is a material impact. Scoping should be discussed with the GLA and agreed with the LPA and should take into account the extent of visibility and the contribution made by setting to the significance of the asset. The level of detail in later assessment should be proportionate and take into account the significance of the asset.
28. The preferred method in relation to intervisibility and visual impacts, supported by GPA3¹⁰, is to use a ZTV¹¹ map. When overlaid with plots of heritage assets this is a useful tool in the initial scoping of assets and the identification of representative viewpoints. HIAs should evidence early use of ZTV as a tool to establish the scoping of heritage assets and the extent of intervisibility. HIAs should clearly show the nexus between mutual intervisibility, heritage assets and the visual imagery provided. If a single map becomes visually complex it may be replaced with three maps, one of the ZTV, another of the heritage assets and another of the viewpoints on adjacent pages. It is helpful if a 3D digital model data file (capable of being uploaded into a VuCity model) is shared with GLA officers at Level 2 pre-application stage (or application stage if no GLA pre-application has taken place).¹²
29. The use of distance-based boundaries (often circles) alone for scoping is not supported since they do not reflect the historical links between places or address the topography and the question of intervisibility in the assessment of visual impacts.¹³ Distance-based boundaries also may not reflect potential impacts on the ability to appreciate significance in views, particularly protected and longer distance views. A combination of tools including site visits and maps of the ZTV is needed.
30. Where a ZTV is provided, the technical data around its parameters should be stated including:
 - the software used;

⁹ NPPF Para 207.

¹⁰ For tall buildings, see HEAN4 at Paras 5.3 and 5.8

¹¹ GPA3 refers to both ZTV (Zone of Theoretical Visibility) and ZVI (Zone of Visual Influence). These terms appear to be synonymous; ZTV is used in this note.

¹² For tall buildings, see HEAN4 Para 5.8

¹³ Noting the comments in GPA3 Para 8 and *Commercial Renewable Energy Development and the Historic Environment Historic England Advice Note 15* (HEAN15, 2021) Para 27.

- whether the digital model is a bare earth DTM (digital terrain model) or a DSM (digital surface model);
 - the granularity (level of detail of representation) of the model;
 - whether trees and/or leaves on deciduous trees are switched on or off;
 - whether atmospheric effects (fog, rain etc.) are switched on or off.
31. GLA and LPA officers understand the limitations of such models, particularly in relation to the accuracy of trees. HIAs therefore should provide ZTVs which use a digital surface model with trees and atmospheric effects switched off.
32. Some digital modelling software can only run ZTVs up to a certain distance (VuCity, for example, is currently limited to 2km). However, GIS systems can generate ZTVs over wider areas. Where proportionate and relevant, HIAs should include ZTVs which extend to the limits of what is normally considered perceptible, in order to determine the scoping and whether there are more distant assets which require assessment. Proposals for a tall building with potential visual impacts on relatively distant Registered Parks and Gardens are an example of a scenario where a wider ZTV would be needed. In such cases it may be helpful to provide two ZTVs: one set widely for distant assets and another more narrowly for assets closer to the site.

Methods for grouping heritage assets

33. Where impacts on the contribution made to significance by the setting of heritage assets are likely to be low, it may be appropriate to group heritage assets together for assessment. Where impacts are likely to be higher, or the assets are highly graded, separate assessments should be provided. Where grouping is used it should be based on both:
- Shared significance (e.g. terraced houses of similar appearance and history) and
 - Shared interaction with the proposed development (e.g. the terraced houses are in a similar location, elevation and orientation).
34. HIAs should not use Townscape Character Areas (TCAs) as a method for grouping heritage assets, since townscape character is not a concept related to heritage significance.

Analysing the contribution made to significance by setting

35. The importance of setting lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance.¹⁴ The contribution made by setting to significance or the ability to appreciate significance is related to the heritage

¹⁴ GPA3 Para 9.

interests of the asset itself. An analysis of the contribution made by setting should start with the asset and its heritage interests and discuss how the setting contributes to these interests and/or the ability to appreciate them. This is best articulated in terms of the heritage values originating in *Conservation Principles* (English Heritage, 2008) which are now articulated in the PPG¹⁵ as a) archaeological b) architectural and artistic and c) historic interests.

36. There is more to setting than simply the surroundings of an asset.¹⁶ Analyses which simply provide a verbal description of the existing setting and do not clearly and robustly link back to significance and heritage interests can be problematic, since this can result in a later failure to adequately assess the impact on the contribution made by setting.
37. HIAs should, where relevant, assess the non-visual aspects of setting such as patterns of use and functional relationships; levels or absence of noise, dust, vibration; movement and activity; historical and aesthetic links between places; character; aspect; diurnal changes; openness; the dominance, prominence and context of the heritage asset; the deliberate design of groups of associated buildings; and cultural and intrinsic associations.¹⁷
38. Where heritage assets are in scope, HIAs must provide a clear and explicit analysis of the contribution made by their settings to significance¹⁸. For scoped assets, HIAs should include a brief history of the setting with appropriate use of map regression and provide a clear analysis of how the different elements of the existing setting make a positive, neutral or negative contribution to the significance of the heritage assets or the ability to appreciate that significance, articulated with reference to each heritage interest. Where there is modern and recent development within their setting the analysis should include an assessment of whether this conserves, enhances or harms or has a neutral impact on significance.¹⁹

Selecting views, viewpoints and using the LVMF

39. HIAs should not focus on recognised and designated views to the exclusion of other relevant views. Some views have been identified in policy, including LVMF views (from *The London Plan*), views identified for monitoring purposes in relation to World Heritage Sites (from *WHS Management Plans and Settings Studies*), Locally

¹⁵ Paragraph: 006 Reference ID: 18a-006-20190723 Revision date: 23 07 2019

¹⁶ GPA3 Paras 9, 27 and 29.

¹⁷ GPA3 Paras 26 and 27 and Assessment Step 2 Checklist.

¹⁸ NPPF Para 207.

¹⁹ For tall buildings, see also HEAN4 at Para 5.3

Important Views (from the Local Plan) and views in conservation area appraisals. However, these may not be the only views that are relevant in a particular case. HIAs should proportionately include all the viewpoints necessary to assess impacts on the contribution made by setting to the significance of the heritage assets and the ability to appreciate that significance.

40. Where development proposals may impact the settings and therefore the significance of the Strategically Important Landmarks and other landmarks protected by LVMF, visualisations of the relevant LVMF views should be provided as a minimum, together with other relevant views.²⁰
41. HIAs should include brief text justifying the selection of each viewpoint, explaining why the viewpoint is relevant to the significance of the asset or its appreciation. Relevant viewpoints may be famous or little-known. Relevant viewpoints may relate to either deliberately designed views or those which have evolved fortuitously over time. Viewpoint selection should be based on scoping and discussed with the GLA and agreed with the LPA and, in the case of assets of archaeological interest, GLAAS.
42. Viewpoints should be safe places to stand. In most cases these will be publicly accessible, although in some cases it may be necessary to locate a viewpoint on private land or privately-owned public space.

Providing visualisations, Accurate Visual Representations and 3D digital models

43. Visual imagery (e.g. AVRs) may be included within and form part of the HIA. If located elsewhere (e.g. in a TVIA or the ES) it should be clearly cross referenced. The best approach may be to provide a single set of full-sized, high resolution, visual imagery as a volume, chapter or document, which can then be cross-referenced from the HIA as well as the TVIA and the ES, as necessary and appropriate. HIAs may include smaller cut and pasted reference images to aid reference in discussion, as long as full-sized, high resolution, images are available and clearly cross-referenced, elsewhere. Full size, high resolution, imagery is particularly important in relation to important and sensitive viewpoints and where the views involve long distances (including LVMF views and views relating to World Heritage Sites). Wherever located, AVRs should be clearly and consistently numbered. **HIA should clearly reference (for example through a table) all the AVRs which relate to a particular heritage asset.**
44. Visual imagery including AVRs should be produced in line with recognised industry best practice codes (which should be referenced). The accuracy and level of detail

²⁰ Noting the comments in HEAN4 Case Study 4 (page 18).

shown should be clearly stated, drawing on the visualisation type descriptions in the *Visual Representation of Development Proposals, Technical Guidance Note 06/19*.²¹ Visual imagery which relates to LVMF views should draw on the visualisation type descriptions in the *London View Management Framework SPG*²². Where there is a departure from this guidance, this should be clearly stated, and an explanation provided.

45. Where deciduous tree canopy screening is evident in summer views, winter views with the canopies bare, should also be provided. It is good practice, where relevant, to include a sample of night visualisations.²³
46. For ease of assessment, HIAs should provide explanatory text for each image, stating where the viewpoint is located and which heritage assets are in the view, with their designations. Explanatory text may neutrally describe what is visible in the existing, proposed and cumulative views (for example naming prominent buildings) and the type and extent of the impacts (for example explaining where buildings are obscured).
47. HIAs should provide cumulative scenario images which distinguish between schemes which have been consented, consented and lawfully implemented (but not yet progressed) and those under construction (e.g. through the colour of wirelines). Schemes which have not been consented, or where the consent has expired should not be included, although an additional image may be separately provided for information purposes.
48. HIAs should provide a key and legend explaining any colour coding (e.g. of wirelines) and special effects (e.g. broken lines).

Part 5 Making assessments, drawing conclusions

Introduction

49. This part of the Practice Note relates to the following GPA3 steps:

- Step 3: Assess the effects of the proposed development, whether beneficial or

²¹ *Visual Representation of Development Proposals, Technical Guidance Note 06/19* (Landscape Institute, 2019). The sections of this document which address the technicalities of producing and presenting visual imagery are appropriate for HIA purposes. It is noted that this document is under review.

²² *London View Management Framework SPG*²² (GLA, 2012) at Para 474 (page 248). It is noted that this document is currently under review.

²³ HEAN4 Para 5.7

harmful, on significance or on the ability to appreciate it.

- Step 4: Explore ways to maximise enhancement and avoid or minimise harm.
- Step 5: Make and document the decision and monitor outcomes.

Describing the proposed development

50. If HIAs include further details of and/or discussion of the proposed development (that is additional to the development description on the application form), this should focus on the aspects of the proposals relevant to significance, with reference to the relevant heritage interests. HIAs for World Heritage Sites should focus on the aspects of proposals (equivalent to the elements of proposed action in UNESCO 2022 Tool 3) relevant to attributes of OUV and the maintenance of integrity and authenticity. The description and discussion should be independent in stance and neutral in tone.²⁴

Avoiding and minimising harm²⁵

51. As noted above (at Para 10), although GPA3 places this process at Step 4, HIA should be a continuous and iterative process, starting at project conception. Avoiding and minimising harm is likely to be approached through the consideration of alternatives and the exploration of design options.²⁶

52. HIAs should include (or include a signpost e.g. to the DAS) a narrative of how design options have been explored to avoid or minimise harm, including, where relevant, through review by Design Review Panels. If “mitigation by design” or “embedded mitigation” are stated, the HIA should include or signpost a narrative of such design options.

Considering good design in relation to heritage settings

53. The aspects of good design which are relevant to an assessment in a HIA are:

- Whether the location is appropriate in heritage terms; and
- How the design relates to the historic context²⁷; and

²⁴ Noting the comments in *Statements of Heritage Significance: Analysing Significance in Heritage Assets Historic England Advice Note 12* (HEAN12, 2019), Para 33 bullet point 2, page 13. The suggested structure for a statement of heritage significance may be helpful here.

²⁵ Noting the comments in GPA2 Paras 6 and 26 around avoiding and minimising harm. The description of the “staged approach” provided in HEAN12 Paras 6 to 10 is helpful here.

²⁶ NPPF Para 208, GPA3 Pars 37 to 40.

²⁷ See *National Design Guide* (MHCLG, 2019), Paras 37 to 39 and 45 to 48, London Plan Policies D3, D9 and HC1 and *Optimising Site Capacity: A Design-Led Approach LPG* (Mayor of London, 2023) Para 2.6.

- How the design has sought to avoid or minimise harm to the contribution made by setting to the significance of heritage assets; and
 - How the design impacts the contribution made by setting to significance or the ability to appreciate significance; and
 - In the case of tall buildings, a consideration of the factors identified in HEAN4 Para 3.3.
54. Proposals may be of high design or architectural quality, provide an iconic marker with wayfinding benefits, provide a focal point in a view with a directional quality or consolidate or complete an existing skyline composition or cluster or contribute to the layered quality of the view. Where substantiated, such benefits may be public benefits of a design, townscape or architectural type, but do not in themselves avoid or minimise heritage harm. Architectural quality, even if outstanding, does not in and of itself avoid or minimise harm and is not a justification for harm.²⁸
55. Where proposals create a benefit to the significance of heritage assets through enhancement of their settings, this may be a heritage benefit.
56. HIAs should explore the suitability of the location of the proposed development, how its design relates to the historic context, how the design has sought to avoid and minimise harm and how the design relates to significance, including any contribution made by setting.

Making a cumulative assessment

57. Cumulative assessment is an attempt to assess the proposed development in its future context; this will include existing buildings, those consented, those lawfully implemented but not yet progressed and those under construction. HIAs should provide an assessment of cumulative impacts, based on a reliable and credible assessment of the contribution made to significance by setting and the ability to appreciate significance, linked to the relevant heritage interests. Where relevant, consideration should be given to the evolution of the setting over time and how or if existing development has changed the contribution made by setting to significance. If GPA3 Step 2 (above) has been robustly undertaken, this understanding will already be in place. Any remaining value in the contribution that setting makes to the significance of the asset should be recognised.
58. Where the HIA is assessing visual impacts on the contribution made by setting to the significance of heritage assets, the purpose of cumulative assessment is to identify

²⁸ *Starbones Ltd v SoS [2020] EWHC 525* Paras 67 to 72, particularly Para 67.

impacts that result from introducing the proposed development into views with other existing and potential developments.²⁹

59. There are two approaches to assessing cumulative impacts in HIA:

- Additive impact assessment, which focuses on the additional impact of the proposed development in the context of the cumulative scenario. Consideration should be given to whether additional change will further detract from, or can enhance, the significance of the asset and the ability to appreciate significance.
- Combined impact assessment, which focuses on the totality of the combined impacts of the proposed development, and the schemes in the cumulative scenario.

HIAs should explicitly state whether the cumulative assessment is additive or combined in nature. Where cumulative assessment is relevant, either approach may be used.

Defining heritage benefits

60. The PPG gives the following examples of heritage benefits:

- “sustaining or enhancing the significance of a heritage asset and the contribution of its setting
- reducing or removing risks to a heritage asset
- securing the optimum viable use of a heritage asset in support of its long-term conservation.”³⁰

61. Where a proposed development includes elements such as the restoration of a building, the reinstatement of lost features, works which result in the removal of the asset from the Heritage at Risk Register, or works which bring a heritage asset back into use or achieve the Optimum Viable Use, these are heritage benefits.

62. Where a development enhances the significance of a heritage asset through changes to the asset’s setting this is also a heritage benefit.³¹ This is the case, for example, where development provides or re-provides a significant view *of* the asset. However, the GLA considers that new or improved public views *from* a heritage asset in most cases are unlikely to deliver heritage benefits, although they may be public benefits if it can be shown that the new or improved public view sustains or enhances the significance of the heritage asset by conserving or enhancing the heritage interests

²⁹ For tall buildings, see HEAN4 Para 6.5

³⁰ PPG Paragraph: 020 Reference ID: 18a-020-20190723 Revision date: 23 07 2019

³¹ NPPF Para 215 and GPA3 Para 38.

expressed in its setting, or the ability to appreciate that significance.

63. The following aspects of proposals may be heritage benefits³²:
- increased public access to heritage; or
 - increased public participation in heritage; or
 - increased public interpretation and education opportunities.
64. HIAs should identify any heritage benefits and clearly distinguish these from other public benefits.

Using the terminology of the NPPF

65. HIAs should clearly explain how significance is being enhanced, conserved or harmed, or whether there is a neutral impact, with reference to the specific heritage interests that are affected. HIAs should use the terminology of the NPPF in heritage assessments and conclusions, presenting a clear conclusion on neutral impacts and heritage harm or benefit in relation to each and every heritage asset impacted. EIA language, including that around “significant” and “not significant” effects should not be used in the HIA.
66. In relation to negative impacts, the NPPF uses the terms “substantial” harm and “total loss” and “less than substantial” harm in relation to impacts on the significance of designated heritage assets³³. Scales of extent may be used, which should be explained at the start of the assessment.³⁴ The GLA’s preferred terminology for these terms is as follows:
- **Positive:** The proposals enhance, benefit or better reveal significance.
 - **Neutral:** The proposals preserve or sustain significance and no harm is caused.
 - **Negative - Substantial harm:**
 - The proposals cause total loss of significance.
 - The proposals cause substantial harm to significance.

³² GPA3 Para 38.

³³ In the Draft NPPF December 2025, the term “less than substantial harm” has been dropped in favour of “harm” and the test for “substantial harm” has been clarified.

³⁴ PPG Paragraph: 018 Reference ID: 18a-018-20190723 states that “Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.” The “GLA preferred terminology for extents of less than substantial harm” are provided for information only, to show the approach taken by GLA officers in their own assessments.

- **Negative - Less than substantial harm:** The GLA preferred terminology for extents of less than substantial harm is “The proposals cause less than substantial harm to significance” and the impact can be classified as:
 - Very high
 - High
 - Middle to high
 - Middle
 - Low to middle
 - Low
 - Very low

67. The language around positive impacts on significance is less codified but the terms “sustain”, “enhance”, “conserve”, “preserve”, “better reveal” and “benefit” are all used. It is recognised that in some cases, the impact will be neutral.³⁵

Striking balances

68. The assessment of the category and extent of harm is for the heritage consultant and Conservation Officer. The process of striking planning balances is a matter for the decision-maker.

69. The preferred terminology above does not address the weight to be given to harm or benefit in the planning balance. As a matter of law, considerable weight and importance must be given to any harm to a listing building and/or its setting and to a conservation area, as a result of development within the area and the level of weight in any give case will be dependent on the level of harm and significance of the asset. More generally, NPPF Para 212 states that great weight³⁶ should be given to the asset’s conservation and the more important the asset, the greater the weight should be. The NPPF defines “conservation” as “the process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.” Proposals which harm the significance of any designated asset clearly do not sustain it, therefore, in accordance with national policy, harm to significance attracts great weight (i.e. which would equate to very significant weight) in any planning balance.

70. Neither legislation nor the NPPF Chapter 16 is explicit in respect of whether heritage

³⁵ In the Draft NPPF 2025, the term “no effect” is used for a neutral impact.

³⁶ In the Draft NPPF December 2025, the term “substantial weight” is used.

benefits must also attract great weight. Recent caselaw³⁷ suggests that benefits *may* attract great weight. However, there is nothing in legislation, planning caselaw or policy which provides that heritage benefits *must* in all cases attract such weight. Ultimately, the weight to be afforded to heritage benefits will be a matter of planning judgement for the decision-maker as part of the relevant planning balances, having regard to factors including the nature, extent and effect of the benefit and the value of the asset which is benefitted.

71. When affording weight to public benefits which are heritage benefits, decision-makers should consider the ability to secure the benefits, their longevity and the ability to preserve the stated benefits in the future through the planning process.
72. The GLA's general approach and the starting point is that heritage benefits should be assessed as public benefits in the overall NPPF Para 215 planning balance. GLA officers will not generally make use of the internal balance of harm (see below) in their own assessment, except where the three criteria in Paragraph 75 below are met. The GLA's strongly preferred approach is for applicants to use the "overall balance" approach, whereby heritage benefits are regarded as public benefits and used only in the NPPF Para 215 overall balance.
73. The "internal balance of harm" is an approach whereby heritage benefits are netted off against heritage harms (prior to the later overall planning balance of heritage harm against public benefits required by NPPF Para 215). This approach is legally available, but not necessary in all cases;³⁸
74. It is considered that the use of the internal balance of harm has the potential to raise the following issues:
 - Depending on the facts of the case, this approach has the potential to undermine the principle of the irreplaceable nature of heritage significance;
 - This approach may discourage the exploration of less harmful options required by the NPPF;
 - This approach can have the effect of artificially reducing the category and/or extent of harm identified;
 - This approach may lead to double counting (if the heritage benefit is used to

³⁷ *Safe Rottingdean Ltd v Brighton And Hove City Council* [2019] EWHC 2632 (Admin) especially at Para 99.

³⁸ *City and Country Bramshill v SoS HCLG* [2019] EWHC 3437 (Admin) and [2021] EWCA Civ 320 and *Regina (Save Stonehenge World Heritage Site Ltd) v Secretary of State for Transport* [2021] EWHC 2161 (Admin) at Para 195: "when assessing the impact of a project on a heritage asset it is permissible to combine both the beneficial and the adverse effects on that asset."

offset harm and then used again in the overall planning balance as a public benefit);

- HIAs should be focussed on the assessment of heritage harms or benefits: striking planning balances is a matter for the decision-maker.

75. Where all three of the following criteria are met the use of the internal balance of harm may be appropriate:

- Where the heritage benefits and harms relate to the same heritage asset;³⁹ and
- Where the benefits and the harms are fundamentally intertwined, and it is not possible to achieve one without incurring the other. (An example would be a development which demolished negative contributors in a conservation area and repaired a damaged streetscape but included a taller element which caused harm to heritage settings); and
- Where the benefit is intrinsically related to, and a direct product of, the harm caused. (An example would be an enabling development in the setting of a decayed listed building which caused harm to heritage settings but provided the funds to secure the restoration of the building and secure its removal from the Heritage at Risk Register).

76. If the HIA includes any balancing exercise, it should be clearly stated whether the internal balance or overall balance approach is being taken, and the reasons for this, consistent with the advice given above.

³⁹ *Regina (Save Stonehenge World Heritage Site Ltd) v Secretary of State for Transport* [2021] EWHC 2161 (Admin) at Para 195.

Appendix A Glossary of Acronyms

Acronym	Explanation
AVR	Accurate Visual Representation. This is a technically specified image which, if created and used correctly, is similar to the experience of the human eye when on site.
BHTVIA	Built Heritage, Townscape and Visual Impact Assessment.
CIfA	Chartered Institute for Archaeologists, a professional association.
CMLI	Chartered Member of the Landscape Institute, a professional association.
DAS	Design and Access Statement.
EIA	Environmental Impact Assessment, the process of preparing an ES.
ES	Environmental Statement, the report resulting from an EIA.
GLA	Greater London Authority, the regional planning authority for Greater London.
GLAAS	Greater London Archaeological Advisory Service.
GLHER	Greater London Historic Environment Record.
GLVIA3	<i>Guidelines for Landscape and Visual Impact Assessment</i> (LI and IEMA, 2013, 3rd Edition).
GPA2	<i>Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning: 2</i> (Historic England, 2015).
GPA3	<i>The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3</i> (Second Edition) (Historic England, 2017, 2nd Edition).
HEAN4	<i>Tall Buildings: Historic England Advice Note 4</i> (Historic England, 2022).
HER	Historic Environment Record.
HIA	Heritage Impact Assessment.

Acronym	Explanation
HTVIA	Heritage, Townscape and Visual Impact Assessment (may also be referred to as BHTVIA).
ICCROM	The International Centre for the Study of the Preservation and Restoration of Cultural Property. An intergovernmental organisation dedicated to the preservation of cultural heritage worldwide through training, information, research, cooperation and advocacy programmes. Created by UNESCO, it aims to enhance the field of conservation-restoration and raise awareness to the importance and fragility of cultural heritage.
ICOMOS	The International Council on Monuments and Sites is a professional association that works for the conservation and protection of cultural heritage places around the world. Created as a result of the Venice Charter of 1964, it offers advice to UNESCO on World Heritage Sites. ICOMOS International is the advisor to the World Heritage Committee.
ICOMOS UK	An independent charity with a UK-wide and international mission to promote and support best practice in the conservation, care and understanding of the historic environment, particularly in relation to World Heritage Sites in the UK.
IEMA	Institute of Environmental Management and Assessment, a professional association, now ISEP.
IHBC	Institute for Historic Building Conservation, a professional association.
ISEP	Institute of Sustainability and Environmental Professionals, a professional association, formerly IEMA.
IUCN	The International Union for Conservation of Nature (IUCN) is an international organization working in the field of nature conservation and sustainable use of natural resources. This UN based body is relevant in relation to the Royal Botanic Gardens, Kew WHS.
LI	The Landscape Institute, a professional association.
LPA	Local Planning Authority.
NPPF	National Planning Policy Framework.
LVMF	London Views Management Framework.
PCHIA	<i>Principles of Cultural Heritage Impact Assessment in the UK</i> (IEMA, IHBC and CIFA, 2021).

Acronym	Explanation
PPG	Planning Practice Guidance.
SIL	Strategically-Important Landmark. In <i>The London Plan 2021 Policies</i> HC3 and HC4 and the London View Management Framework SPG, the Mayor of London has identified SILs “that make a very significant contribution to the image of London at the strategic level or provide a significant cultural orientation point.” These are St Paul’s Cathedral, the Palace of Westminster and the Tower of London.
TCA	Townscape Character Area.
TVIA	Townscape and Visual Impact Assessment.
UNESCO	The United Nations Educational, Scientific and Cultural Organization is a specialized agency of the United Nations with the aim of promoting world peace and security through international cooperation in education, arts, sciences and culture. UNESCO are responsible for the inscription of World Heritage Sites.
WHS	World Heritage Site.
ZTV	Zone of Theoretical Visibility.
ZVI	Zone of Visual Influence.