



Historic England

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Direct Dial: [REDACTED]
Our ref: PL00795349/795336
Date: 25th April 2024

Dear Sir or Madam

South Kesteven Regulation 18 Local Plan consultation

Thank you for consulting Historic England regarding the South Kesteven Lincolnshire Local Plan.

General Comments

Notwithstanding the advice given in this letter, we reserve the right at a later stage to comment or object to any proposals that come forward as part of the Local Plan. Where we have not commented on a site allocation which has current planning approval or has been previously allocated, this is not to say that Historic England will not comment or object during a future consultation should the permission expire or in light of other changes and / or additional information. Due to the number of sites proposed, only new sites have been considered at this stage.

As with all proposed sites, please ensure that your Conservation Officer and Archaeological Advisor have been consulted. Where we have not commented on a site, it is because we are not aware of any issues with regard to designated heritage assets or areas of high archaeological value, but there may be potential archaeological or historic landscape issues that the HER and county archaeological advisors will be able to identify. **We recommend that local authority archaeology and conservation expertise should be used in relation to all heritage assets for the site allocations proposed and considered.**

The following guidance may be of particular relevance in this instance:-

<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>



[REDACTED]



Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.



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

<https://historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/>

<https://historicengland.org.uk/images-books/publications/planning-archaeology-advice-note-17/>

<https://historicengland.org.uk/images-books/publications/deposit-modelling-and-archaeology/>

<https://historicengland.org.uk/images-books/publications/preserving-archaeological-remains/>

Detailed Comments

Our detailed comments on the proposed Policies are set out in Appendix A and on Allocations within Appendix B.

Local Plan comments

If you have any queries about any of the matters raised or consider that a meeting would be helpful, please do not hesitate to contact me.

Evidence Base

The evidence base is critical to the preparation of a Local Plan in accordance with the NPPF. There is concern regarding the lack of heritage assessments presented within the evidence base. Much of this information may already be available.

Particularly relevant to site allocations and designations could include the following:-

- Updating conservation area appraisals
- Heritage Impact Assessment for site allocations
- Undertaking characterisation studies
- Producing setting studies – of specific settlements, or specific heritage assets
- Local lists
- Assessments of landscape sensitivity

Sustainability Appraisal Comments

The following document may be of assistance:-

<https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>





SA objective 6) (table 2.14) is welcomed.

Section 6 – Assessment of Potential site options
Historic Environment

A specified distance or proximity as a form of assessment of impact is strongly discouraged. It is important to understand the significance of any heritage assets, and their settings that would be affected by a potential site allocation. This involves more than identifying known heritage assets within a given distance, but rather a more holistic process which seeks to understand their significance and value. Our guidance within GPA2 and HEAN3 referenced within the links at the start of this letter are of particular relevance.

Paragraph 6.34 is welcomed although assessment is required at the allocation stage to ensure a sound plan in accordance with the NPPF and not just later in the planning process.

Section 7 – Assessment of proposed updates to the Local Plan
Historic Environment
Welcomed

Site assessments

As above, there is concern that the distance of heritage assets from potential site allocations has been used as an assessment tool within the Assessments Annex to the SA; a more holistic case by base approach is required. Non-designated heritage assets should also be considered.

It was difficult to locate the relevant site assessments due to the ordering system of those shown online, is it possible to provide a copy in numbered order (either the SA order or LPA reference order) please?

Closing comments

This opinion is based on the information provided by you in the document provided, for the avoidance of doubt, does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the plan which is the subject to consultation, and which may, despite the Sustainability Appraisal have adverse effects on the environment. We hope that the above comments are of assistance. Please do not hesitate to contact me to discuss,

Yours sincerely

Emilie Carr

Emilie Carr
Historic Environment Planning Adviser

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[Redacted contact information]



Appendix A: Table of Historic England’s comments on the Draft South Kesteven Local Plan

[Historic England’s comments on the proposed Allocations are set out in Appendix B]

Page	Section	Support/ Object	Comments	Suggested Change
	3.3 Vision		The vision is welcomed together with its reference to heritage assets, it would be helpful to include reference to settings.	
	3.5 Objectives		Reference to <i>‘heritage assets and their settings’</i> should be included to more closely reflect NPPF terminology.	
	Chapter 5		<p>Historic England would welcome early informal consultation on the Climate Change Study when available.</p> <p>The following documents may also be of use:-</p> <p>Heritage Counts 2020 – Know your Home, Know your Carbon: Reducing carbon emissions in traditional homes.</p> <p>HEAN14 Energy Efficiency and Traditional Homes</p> <p>HEAN 15: Commercial Renewable Energy Development and the Historic Environment</p> <p>A full list of all our technical guidance on energy efficiency, including research reports which could form a useful part of the plan’s evidence base, can be found in our publication directory:</p> <p>https://historicengland.org.uk/content/docs/advice/technical-conservation-guidance-and-research-brochure-pdf/</p>	
	5.17		Please can Historic England be consulted as soon as possible if the emerging Climate Change study results in policy changes.	
	SP4		Criteria d is welcomed.	

Page	Section	Support/ Object	Comments	Suggested Change
	H1		Please see Appendix B.	
	Chapter 9		Please see Appendix B.	
	Chapter 10, EN1		The Landscape character areas and supporting policy are welcomed.	
	EN6		Policy EN6 is welcomed. More detailed supporting text would be welcomed, however the changes to the policy are welcomed.	
	EN7		Policy EN7 is welcomed.	
	DE1		Policy DE1 is welcomed.	
	12.8-12.11		The supporting text is welcomed.	
	GR1		The policy is welcomed. Historic England would be very happy to be consulted informally once evidence is finalised prior to Regulation 19.	
	Chapter 12		Please also see Appendix B. GR3-H1 criteria i) is welcomed. GR3-H2 – criteria i) is welcomed GR3-H3 – criteria h) is welcomed. GR3-H4 – criteria iv) is welcomed. SKPR-36 – density per hectare paragraph welcomed together with criteria c and e.	
	Evidence Base	Object	At present, the evidence base is insufficient to meet the requirements of paragraph 31 of the NPPF, further guidance is provided in the accompanying covering letter. As noted within the letter, some of this evidence is likely already available	

Appendix B: Table of Historic England’s comments on the proposed Allocations in the Draft of the South Kesteven Local Plan

[Historic England’s comments on the remainder of the Local Plan are set out in Appendix A]

At this stage, without more detailed assessment it is not possible to provide a comprehensive response. Once detailed assessments have been carried out as part of the evidence base for the Local Plan, as suggested below, a more detailed response can be provided. As such, an objection may be forthcoming at a later stage.

Site Ref.	Location	Support/ Object	Comments	Suggested Change
SKP -268	Land at train station		More detail is required in criteria C of the policy. There are Grade II Listed buildings within the northern section of the site together with evidence of previous archaeological finds – a heritage assessment, including archaeological assessment will be required. 507012 – the railway station on the London and York Railway opened in 1850. Historic England would be happy to assist with wording.	Greater detail within criteria c, Historic England would be very happy to assist with wording.
SKP -57	Land off Belton Lane		Criteria h is welcomed. It may be helpful to request a detailed heritage assessment also considering cumulative impact. Requires archaeological assessment AMIE 891796 Romano-British, Early Medieval and Medieval pottery and tile.	
281/ 282	Stamford North		Please refer to our detailed previous advice on this cross authority site, both on previous Local Plan responses and the subsequent planning applications. Historic England have had detailed involvement on this site and have objected to the scheme in the Rutland Local Plan. Historic England’s objection is to the site to the west within Rutland’s authority area. Historic England commented:- “The proposal should reflect the previous negotiations and the setting of the two SM’s as negotiated through	

Site Ref.	Location	Support/ Object	Comments	Suggested Change
			2022/0227/MAO and in previous SPD consultations prior to that. The development will be harmful to the setting of the scheduled monument at Great Casterton (reference 1005067). 1005067 is a Roman town and fort, located on a crossroads and on the river valley. Control over landscape, including the views across and over the river valley – are part of the form, function and placement of this site. 1005031 Ermine Street is the second scheduled monument to the south of the site.”	
26	Priory Farm Land, Deeping St James		Grade I Church of St James Grade II* Priory Farmhouse and Grade II table tombs adjacent to the church to the west of the site, together with the potential for archaeology (350078 to south, iron age gold coins and 3500059 St James Prior cell to west). Detailed assessment required.	
53	Land at Mill Drove	Potential objection	Potential for archaeology (1388898 evidence of early bronze age settlement) Note bronze age / iron age / roman evidence (field walking / excavation / geophysical survey around Meadow Drain 100m grid ref 510800/321100). There is concern regarding this site. If suitable to be taken forward, revisions to policy SKPR-53 will be required.	
83	Land North of Mill Drove,	Potential objection	Car Dyke Scheduled Monument to the north of the site. The Car Dyke continues south from the scheduled section and forms the western boundary to the site, assessment is certainly required – note bronze / iron age / roman evidence (field walking / excavation / geophysical survey around Meadow Drain 100m grid ref 510800/321100 – this also raises the likely archaeological potential – this allocation is likely to have setting impact upon the SM to the north https://historicengland.org.uk/listing/the-list/list-entry/1004959 visually and potentially in terms of impacts of buried remains.	

Site Ref.	Location	Support/ Object	Comments	Suggested Change
			<p>The development looks to cross the Car Dyke to attach to existing development. There is concern regarding this site.</p> <p>If suitable to be taken forward, revisions to policy SKPR-83 will be required; the scheduled monument is not referenced within the policy.</p>	
58	Land to the east of Ermine Street, Ancaster		<p>Archaeology assessment required (325952 finds to north roman inurnations and possible malting oven).</p> <p>Criteria c within policy SKPR-58 is noted.</p>	
283	Land off St Martins Way, Ancaster		<p>Archaeology assessment required (finds to south and west) SM 1004958 to west beyond Pottergate Road</p> <p>This is a high potential area for prehistoric through roman activity – in association with Jurassic Way - Lincolnshire</p> <p>Lincoln to Stamford section of prehistoric route linking Yorkshire and Somerset. Partly utilised by Roman roads and the scheduled Roman marching camp to the west https://historicengland.org.uk/listing/the-list/list-entry/1004958</p> <p>The features marked to the immediate south and west are former quarries (west) and the train station (south)</p> <p>Criteria e within policy SKPR-283 is noted.</p>	

Site Ref.	Location	Support/ Object	Comments	Suggested Change
242	Land East of Honington, Barkston	Potential objections, assessment dependant	<p>The site is to the north of the Conservation Area and Grade I Church of St Nicholas, at the entrance to the village. There are concerns regarding the setting of the Church of St Nicholas, views into towards the spire and from the churchyard. An assessment should test views looking south towards the church and looking N from outside south porch (churchyard elevated). The intervening structures on the Northern side of the church are noted but concerns remain subject to assessment.</p> <p>Criteria c) of policy SKPR-242 is noted.</p>	
109	Land fronting Deeping Road, Baston		<p>Archaeology assessment required, previous finds</p> <p>https://www.heritagegateway.org.uk/Gateway/Results_Single.aspx?uid=adea5096-d853-4c44-9f96-4228697dcd28&resourceID=19191 viz</p> <p>Grid Ref : TF1082014250</p> <p>Summary : An Iron Age/Roman rectilinear enclosure complex, probably relating to settlement, is visible as cropmarks on 2015 air photographs.</p> <p>Criteria d), policy SKPR-109 is noted.</p>	
61 and 103	Former Aveland School and Land to west of Pointon Road, Billingborough		<p>Assessment required due to size / potential for cumulative impact (including upon western and southern entrance gateways to the village) on historic core of Billingborough and its Conservation Area.</p>	

Site Ref.	Location	Support/ Object	Comments	Suggested Change
120	Land at the East of Stamford Road, Colsterworth		<p>Potential for archaeology (finds within site, including 325496 Anglo Saxon sword)</p> <p>Grid Ref : SK9300023000</p> <p>Summary : Anglo Saxon sword found in the River Witham</p> <p>More information : An Anglo-Saxon, sword, 31in. long and 2in. wide, from Colsterworth, is in Grantham Museum. (1-2)</p> <p>To the west of the Stamford road between it and the river lies the remains of the deserted medieval village to Twyford - Deserted Medieval village comprising hollow ways, boundaries, enclosures, buildings and pits seen as earthworks.</p>	
241	Land off Church Lane, Great Gonerby		Assessment required, potential for impact upon Grade I Church of St Sebastian to north west together with the Conservation to the north west. Criteria c of policy SKPR-214 noted.	
74	West of the Drift, Harlaxton		Harlaxton Conservation Area to south and Harlaxton Grade II* RPAG. Assessment required.	
71	Land north of Dickens Close, Stowe Road		Archaeology assessment required.	
135	Land to the south of Edenham Road, Morton		Assessment required, edge of Conservation Area and finds to west (1030978 probable medieval ridge and furrow)	
Employment sites				
SKP -262	Land at Valley Lane		Potential archaeology	

Site Ref.	Location	Support/ Object	Comments	Suggested Change
SKP -100 and 202	Land at and south of Gonerby Lane		Potential impact upon historic village of Allington and its heritage assets, including II* church of Holy Trinity	