



Historic England

Planning Policy Team
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Council Offices
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Direct Dial: [REDACTED]
Our ref: PL00795349/795336
Date: 20th August 2025

Dear Sir or Madam

South Kesteven Local Plan Regulation 18 Proposed Housing and Mixed-Use Site Allocations Consultation

Thank you for consulting Historic England regarding the South Kesteven Lincolnshire Local Plan housing and mixed-use allocations consultation as a result of revised housing targets.

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:-



Historic England, Midlands Regions Group, The Foundry, 82 Granville Street, Birmingham, B1 2LH
Telephone 0121 6256888 HistoricEngland.org.uk



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Correspondence or information which you send us may therefore become publicly available.



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

<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/>

Detailed Comments

Our detailed comments on the proposed Policies are set out in Appendix A and on Allocations within Appendix B. Where we haven't commented on a site please refer to our previous comments on that site, as we understand from paragraph 1.9 that they will be considered concurrently.

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. Historic England object to the lack of proportionate assessment provided, contrary to paragraph 36 of NPPF. There is very strong concern regarding the lack of heritage assessments presented within the evidence base, such as as referenced on page 4, paragraph 1.20. In accordance with the NPPF, paragraph 36, proportionate evidence must be produced. 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:-



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

Section 5 – Assessing the updates to the proposed housing and mixed-use site allocations

Historic Environment

A specified distance or proximity as a form of assessment of impact is strongly discouraged, such as referenced within paragraph 5.24 to 5.28. 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.

Appendix A Additional 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.

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

