Online Comment

Application	H09-0557-25
Location	Land off Nutts Lane Holbeach St Johns Spalding
Proposal	Erection of new innovative self-build dwelling and detached annexe building to provide architectural studio

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Date Submitted	14-07-25
For/Against	Comments

Thank you for consulting us on this application.
The proposed development is in an area of very high roman archaeological potential and possibly located within an infilled palaeo-river or roddon crest (the highest and driest areas in The Fens which attracted ancient settlement). This has been acknowledged by the submitted design and access statement (p. 21: 3.4.C), which states, "The area is very rich in geodiversity and archaeology, with sediments containing evidence for past environmental and climate changes and with high potential for well-preserved waterlogged site remains at the fen edge, within some of the infilled palaeo-rivers and beneath the peat. " The HER confirms the presence of significant heritage assets within and near the proposed development area: MLI22200 (Possible roman settlement), as well as MLI20412, MLI20234, and MLI22199
Recommendation: Currently there is insufficient specific information on the archaeological potential for the site and the extent of impact to buried archaeological remains from the proposed development. Therefore, I recommend the applicant to provide the results of a full standard archaeological evaluation of the site. This is in line with the guidance set out in the NPPF 2024 (paragraphs 207 & 218).
The applicant has not adequately described the significance of any below-ground heritage assets that may be affected by the proposed development, and it is not "sufficient to understand the potential impact of the proposal on their significance (the heritage assets')" (Paragraph 207 of the National Planning Policy Framework (NPPF)). This in turn does not allow the Local planning authority to "identify and assess the particular significance of any heritage asset that may be affected by a proposal." (Paragraph 208 NPPF). Given the very high archaeological potential, but as yet unknown character and extent, I recommend this application to be accompanied by the results of a geophysics survey, geoarchaeology assessment and full standard archaeological trial trench evaluation in order to properly assess the site potential, inform the appropriate planning advice and design an appropriate mitigation strategy should consent be subsequently granted. The evaluation will aim to determine the presence, absence, significance, extent depth and character of any archaeological remains which will be impacted by the proposed development as noted above.
It should also be noted that preferred mitigation strategies will include preservation in situ (avoidance of sensitive areas) where possible and open area excavation where not. It is important that this application to fully considered the implications of this in its project feasibility assessment and that the results have been considered in designing the layout. The ability and flexibility for this is only as good as the knowledge of extent, character and significance of the archaeological resource on the site. We cannot plan mitigation appropriately against unevidenced conclusions. It is also important to avoid any unnecessary planning conditions that would place an unreasonable planning burden on the scheme if significant archaeology were discovered during post-consent evaluation work. Paragraph 57 of the NPPF applies in this case. This information should be provided with the application so that an informed planning recommendation can be made and to meet the requirements of the National Planning Policy Framework (NPPF) paragraphs 207 and 218. With respect to the archaeological evaluation, please contact the Historic Places team at Lincolnshire County Council, Lancaster House, 36 Orchard Street, Lincoln, LN1 1YL, 07386 656079, email ruben.lopez@lincolnshire.gov.uk to discuss the requirements and request preparation of a brief for the works.