



Mr Oscar Patman
South Holland District Council
Priory Road
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Lincolnshire
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Direct Dial: 07823608338
Our ref: L01593341
11 August 2025

Dear Mr Patman

Arrangements for Handling Heritage Applications Direction 2021

MONKS HOUSE, BOURNE ROAD, SPALDING, LINCOLNSHIRE Application No. H16-0526-25

Thank you for your letter of 30 July 2025 regarding further information on the above application for listed building consent. On the basis of this information, we offer the following advice to assist your authority in determining the application.

Summary

We note that some additional information has been provided, however it only partly addresses the concerns we have raised twice before (22 April 2025, 23 June 2025) and therefore our position remains the same. We are concerned with the proposal due to the insufficient information provided which prevents an informed assessment of harm to heritage significance.

Historic England Advice

Impact

Insufficient Impact Assessment

Monks House is a highly significant listed building. Proposed works therefore require a thoroughly informed Heritage Impact Assessment in a level of detail proportionate to the assets' importance.

We previously advised that details of the proposed three new staircases should be provided to enable an adequate impact assessment. The Heritage Statement has not been updated, and the Impact Assessment section still does not adequately describe, or assess the impact of, proposed works. No further understanding is provided of works required to facilitate the new staircases and their impact on fabric at first and second floor.

Some section elevations of the proposed staircases have been provided, however the



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information is limited and of low digital quality, so much so that some annotations are illegible.

The information submitted is insufficient, therefore an informed assessment of impact on significance is not possible. Without this, the application has the potential to harm the significance of the GII* listed building.

Insufficient Justification

The proposed installation of three staircases seeks to substantially alter the interior of the GII* listed building. Any harm to a building of this significance requires clear and convincing justification. Without the appropriate justification, the proposal has the potential to cause harm.

The justification provided for proposed works is as follows;

'The house in its current arrangement contains only two bedrooms. For a house of this size and status, having just two bedrooms is highly unusual. As a consequence, this lack of amenity must surely represent a significant threat to the building's long-term viability, as it will likely reduce the pool of potential future owners willing to take the building on and support its considerable burden of maintenance'.

We do not consider that this is the clear and convincing justification required for the proposed works.

We have previously suggested reallocating the existing room functions within the house to provide additional bedroom accommodation. This could present a less harmful way of achieving further bedroom accommodation and reduce the number of new staircases required.

The Heritage Statement notes that;

'Despite extensive investigation, it has not proved possible to provide access to all areas of the loft space with fewer stairs due to the restricted available space'.

An options assessment has not been provided, nor has information to support the investigation mentioned above. This is required to furnish any presentations of justification.

Policy

In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance [NPPF 207].



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Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal [NPPF 208].

Further to the general duty upon the authority in the 1990 Act S66(1) to have special regard, the National Planning Policy Framework sets out that all harm to designated heritage assets requires clear and convincing justification and in the case of less than substantial harm to be balanced against public benefits, '...great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be) [NPPF 212, 213, 215].

Recommendation

Historic England has concerns regarding the application on heritage grounds. We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 207, 208, 212, 213, 215 of the NPPF.

In determining this application you should bear in mind the statutory duty of section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.

Yours sincerely

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