

Porter, Karen

From: Catherine Bell <catherinebell@archaeologyuk.org>
Sent: 30 July 2025 14:32
To: _planningadvice; Greg.Watkinson@sholland.gov.uk; lincssmr@lincolnshire.gov.uk
Subject: Former Bull And Monkey PH, Church Gate, Spalding, PE11 2RA. Application No. H16-0767-23
Attachments: Former Bull And Monkey PH, Spalding.pdf

Caution: This message originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe. If you believe it is suspicious please forward to Suspicious.Emails@pspsl.co.uk and delete the email.

Dear Greg (and all),

The CBA have been made aware of the above application. Please find our comments and advice attached.

Kind regards,
Catherine.

Catherine Bell

[she/her]

Listed Building Casework
and Advocacy Manager

*Please note my normal
working days are
Monday – Thursday*

www.archaeologyuk.org

De Grey House | St Leonard's
Place | York | YO1 7HE
01904 671417



Certified Carbon Literate



Event registration for the 2025 Festival of Archaeology is now open.

[Click here for more information](#)

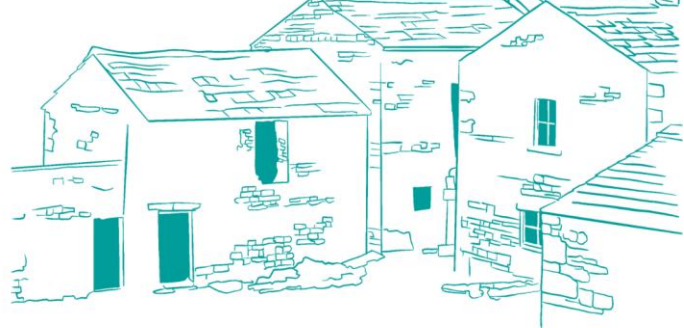
[Explore our Organisers Area here](#)

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by Mimecast, a leader in email

security and cyber resilience. Mimecast integrates email defenses with brand protection, security awareness training, web security, compliance and other essential capabilities. Mimecast helps protect large and small organizations from malicious activity, human error and technology failure; and to lead the movement toward building a more resilient world. To find out more, visit our website.



A National Amenity Society

Greg Watkinson
Planning Case Officer
South Holland District Council
By email: planningadvice@sholland.gov.uk
c.c. Greg.Watkinson@sholland.gov.uk
lincssmr@lincolnshire.gov.uk

30th July 2025

**Former Bull And Monkey PH, Church Gate, Spalding, PE11 2RA.
Application No. H16-0767-23**

Dear Mr Watkinson,

The Council for British Archaeology (CBA) have been made aware of the above application. Based on the information supplied with the application, we offer the following observations and advice to assist your authority in determining the application.

Significance

The redundant Drum and Monkie PH is unquestionably a suitable site for redevelopment, in a central location within Spalding. To meet the many constituent requirements for delivering sustainable development in line with legislation, national and local planning policies, any redevelopment of the site should positively respond to the sensitivities and opportunities to site presents. In relation to heritage these include:

- High archaeological potential, especially relating to **Saxon, medieval and post medieval deposits**.
- Its location within the **Spalding Conservation Area**.
- Its location within the setting of a number of Listed buildings including the highly designated **Parish Church of St. Mary and St. Nicholas** (Grade 1, NHLE No. 1359547), **Ayscoughfee Hall** (Grade 1, NHLE No. 1359532). As well as **Ye Olde White Horse PH** (Grade II, NHLE No. 1308555), **Ascoughfee Hall Gardens** (Grade II, NHLE No. 1000969) and multiple **Listed buildings across the river on Bridge Street and London Road**.

Comments

Above ground impacts

The CBA support the demolition of the standing structures within the application site and its redevelopment. The location of the site dictates that this should be achieved in line with the requirements of sections 66 and 72(1) of the **Planning Listed Buildings and Conservation Areas) Act, 1990**. The CBA do not believe that the scale, massing or design of the proposed structure meets these requirements.

Section 72(1) requires that development within the Spalding Conservation Area should pay special attention to *‘the desirability of preserving or enhancing the character or appearance of that area.’* The Spalding Conservation Area is characterised by a variety of architectural styles articulating its development over multiple periods with a high number of Georgian buildings. There is a rhythm to the street scape that appears to retain medieval burgage plot widths. This creates an undulating height to rooftops with the majority reaching two to three stories. The eight bay, four storey western elevation of the proposed building would be a dominating presence within the Churchgate streetscape, cutting across the undulating rhythm. The impact of the building’s southern elevation on the surrounding area will be even greater. The CBA recognise that the applicants have tried to design the building to be sympathetic with the existing Georgian character of many of the designated structures nearby. However, we question whether the pedimented central bay with pilastered porch would enhance the character of the conservation area. We advise it is more likely to appear as pastiche that undermines the area’s character. As such we advise that as well as section 72(1) of the Act, the requirements set out in NPPF paragraph 203 f) and g) for development in conservation areas are not met.

Section 66 of the Act places a duty on the decision maker to *‘have special regard to the desirability of preserving the [listed] building or its setting or any features of special architectural or historic interest which it possesses’* when considering whether to grant planning permission. Due to the height of the proposed structure exceeding others within the vicinity, its bulky massing will dominate its surroundings, detrimentally impacting the setting of highly designated buildings as well as many Grade II structures.

We recommend the scale and massing of the proposed development is reduced to reduce these harmful impacts on the setting of nearby designated sites. We further advise that the design of the building is revised to enhance local character and continue the legible timeline of development in the local built environment.

Below ground impacts

The CBA note the comments regarding the site’s archaeological potential made by LCC’s Historic Places Team that a desk-based assessment has correctly identified the site’s high potential for

The Council for British Archaeology conducts our casework free of charge. If you appreciate our work you can support us by becoming a member or making a donation. Your support helps us continue to champion sensitive change to the historic environment

Visit archaeologyuk.org/support-us/donations to donate today



significant archaeological deposits. Trial trenching by Oxford Archaeology in February 2024 confirmed the presence of Late Saxon deposits that date from Spalding's Anglo-Saxon origins as well as significant medieval and post-medieval remains. These deposits are expected to extend across the site at depths which would be impacted by foundations and services required for new structures on site. The CBA advise that buried deposits encountered during trial trenching makes footnote 75 of the NPPF relevant to any development of this site. This states *"Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets."* The CBA support the recommendation that an archaeological scheme of works should be conditioned to any planning permission which is ultimately achieved to redevelop this site.

Opportunities for public benefits from redevelopment of the application site

The CBA advocate for public participation and engagement with archaeology for the valuable opportunities it presents for enhanced public benefits through local cultural gain, wellbeing and place shaping gains that reinforce place-based identities. Beyond community participation with excavations on site it is also possible for legacy projects to use handling collections of the finds on site for local schools and community outreach.

Paragraph 218 of the NPPF states that *"Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible."* The objective importance of the archaeology on a given site varies in scale between national, regional and local. However, the resonance and meaning of local archaeology for the local area bears no relation to this objective scaling of importance. To note, the impact on the significance of buried deposits will, by the very nature of archaeological excavation, be total loss, or substantial harm in NPPF terms.

Paragraph 200 of the NPPF states *"Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably."*

Enhancing and better revealing significance need not be solely considered as visual enhancement, but rather as encompassing experiential opportunities for the local community to interact with their local heritage. Incorporating a heritage strand into redevelopment proposals adds a valuable place-shaping strand, which can have considerable benefits in terms of increasing a sense of community, belonging and pride of place. Archaeology relating to Spalding's Anglo Saxon origins, which will necessarily be destroyed

The Council for British Archaeology conducts our casework free of charge. If you appreciate our work you can support us by becoming a member or making a donation. Your support helps us continue to champion sensitive change to the historic environment

Visit archaeologyuk.org/support-us/donations to donate today



by redeveloping this site, presents exciting opportunities for enhanced public benefits. The CBA fundamentally believe that archaeology, at its best, is not finds stored in a catalogued box but an experiential process used to create connections between people & place. In this way archaeological strategies can move beyond mitigation and into creating genuine social value.

ALGAO Scotland have published guidance ([Delivery of Public Benefit and Social Value Guidance for Archaeology in the Planning Process](#)) that sets out a staged approach for best practice in involving the public with archaeological works that develops place-shaping strategies and reinforces local identity. Despite being Scottish planning guidance, the CBA recommend that this represents a proportionate approach to the delivery of public benefits to the high significance of Spalding's early archaeological deposits.

Recommendations

The CBA advise that the scale, massing and design of the currently proposed development makes this application contrary to sections 66 and 72(1) of the Planning (Listed Building and Conservation Areas) Act, 1990 as well as NPPF paragraph 203 f) and g). The CBA **object** to this application on these grounds.

Appropriate redevelopment of the Drum and Monkie PH site should avoid cutting across the scale and massing of the Spalding Conservation Area in order to enhance and best reveal its character and appearance. The CBA believe that in a designated area that demonstrates its multi-phased development, contemporary development should represent the architecture of its period. This can be achieved through sensitive restrained design in a materials palette that ensures it does not jar with other structures within the setting.

Notwithstanding our objection to the currently proposed scheme, the CBA recommend that the potential for public participation, through future redevelopment of this site, can be vastly increased through the production of a heritage strategy which involves interaction between the local community and the tangible and intangible heritage of the archaeology that will be uncovered during any permitted groundworks at the application site. The opportunity for using heritage and archaeology as part of a place-shaping strategy should enable the redevelopment of this site to achieve genuine public benefits, as required by the NPPF.

A number of commercial archaeology units have extensive experience around the inclusion of public participation with archaeological digs and the finds which are generated onsite. There is a raft of possible creative responses to what is uncovered during archaeological interventions, which good contractors are more than able to deliver, when it is required as part of their tender.

The Council for British Archaeology conducts our casework free of charge. If you appreciate our work you can support us by becoming a member or making a donation. Your support helps us continue to champion sensitive change to the historic environment

Visit archaeologyuk.org/support-us/donations to donate today



I trust these comments are useful to you; please keep the CBA informed of any developments with this case.

Kind Regards,



Catherine Bell. MA (cons), ACIfA
Listed Buildings Caseworker

The Council for British Archaeology (CBA) is the national amenity society concerned with protection of the archaeological interest in heritage assets. Local planning authorities have a duty to notify the CBA of applications for listed building consent involving partial or total demolition, under the procedures set out in, **Arrangements for handling heritage applications – notification To Historic England and National Amenity Societies and the Secretary of state (England) direction 2021**.

The Council for British Archaeology conducts our casework free of charge. If you appreciate our work you can support us by becoming a member or making a donation. Your support helps us continue to champion sensitive change to the historic environment

Visit archaeologyuk.org/support-us/donations to donate today

