From: tim.allen@HistoricEngland.org.uk

Sent: 22 July 2025 10:42
To: _planningadvice

Subject: Historic England advice on Application no(s) H23-0313-25

Attachments: H23-0313-25_HERef_P01591385_L474185.doc; H23-0313-25_HERef_P01591385

_L469917.doc

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Dear Mr Niland,

Please find attached our advice on the following site -

Land at Peartree Hill Road, Whaploade Drove Application No(s):H23-0313-25

Yours sincerely,

Tim Allen

Team Leader (Development Advice)
E-mail: tim.allen@HistoricEngland.org.uk

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Mr Mark Niland
South Holland District Council
Council Offices
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Spalding
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Direct Dial: 0121 625 6888

Our ref: P01591385

6 May 2025

Dear Mr Niland

T&CP (Development Management Procedure) (England) Order 2015 & Planning (Listed Buildings & Conservation Areas) Regulations 1990

LAND AT PEARTREE HILL ROAD, WHAPLOADE DROVE Application No. H23-0313-25

Thank you for your letter of 16 April 2025 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Historic England Advice

The proposed development site lies in an area of high potential for Romano-British period archaeological remains, as acknowledged in the submitted heritage statement. There appears limited scope for the development to design out impacts upon buried remains (from the submitted drawings). It is important that the decision maker understands the importance of the archaeological remains on site (to weigh against their benefits) and the likely costs of their excavation (such that the deliverability of the scheme on that location can be understood).

The site is directly marked marked as *Romano-British Remains Found* on the 1958 ordnance survey 1:10000 mapping

Monument Number 353542 Lincolnshire A Romano British settlement consisting of cropmarks of ditched enclosures with 1st to 4th century po... https://www.heritagegateway.org.uk/Gateway/Results_Application.aspx?resourceID=19191&index=0

Further desk based assessment should include Historic Environment Records, Portable Antiquity Scheme data, Environment Agency Lidar data, Historic England and Cambridge University Air Photo Data. This work should cover potential alternative locations on holding. We refer you to the advice of your own archaeological advisors



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and in this instance and strongly recommend pre-determination field evaluation including deposit modelling, geophysical survey and trial trenching. Drainage impacts upon buried remains should also be considered.

In addition to their significance in their own right, Romano-British remains on site should be regarded as setting to the nearby scheduled monument, '1004982 Romano-British settlement S of Shell Bridge' https://historicengland.org.uk/listing/the-list/list-entry/1004982?section=official-list-entry.

Historic England air photographs https://historicengland.org.uk/images-books/archive/collections/aerial-photos/

Cambridge University air photographs https://www.cambridgeairphotos.com/

National Planning Policy Framework paragraphs 207 and 208 cover sufficency of information in the submission and that available to the decision maker. As undesignated heritage assets the remains on site would be subject to paragraphs 216 in terms of balance, 217 in terms of deliverability and 218 in terms of archaeological investigation and recording. Para's 212, 213, 215 address setting impact on the scheduled monument (our prime focus in this case would be in terms of related archaeological remains), were the remains on site to be of demonstrably equivalent importance to the scheduled monument then these policies would also apply in terms of the direct development site impacts further to footnote 75 (and potentially para 214 may also apply depending upon the severity of impact).

Please also see our published advice including:-

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

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

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

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

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

Recommendation



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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 and 212 to 218 of the NPPF.

In determining this application you should bear in mind the statutory duty of Section 38(6) of the Planning and Compulsory Purchase Act 2004 to determine planning applications in accordance with the development plan unless material considerations indicate otherwise.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely

Tim Allen

Tim Allen

Team Leader (Development Advice) E-mail: tim.allen@HistoricEngland.org.uk





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Our ref: P01591385

22 July 2025

Dear Mr Niland

T&CP (Development Management Procedure) (England) Order 2015 & Planning (Listed Buildings & Conservation Areas) Regulations 1990

LAND AT PEARTREE HILL ROAD, WHAPLOADE DROVE Application No. H23-0313-25

Thank you for your letter of 11 July 2025 regarding further information on the above application for planning permission. On the basis of this information, we offer the following advice to assist your authority in determining the application.

Historic England Advice

We note the updated Environmental Statement and the appended report by ABRS. The updated ES asserts that contra the advice of your archaeological advisor, the applicant considers that it would be proportionate to push all archaeological survey, evaluation and mittigation to post-consent under a condition.

Given the high archaeological potential of the site this would appear to fail to address NPPF 207 and 208 in terms of the decision maker having before them a sufficent understanding of the significance of the site and the likely impact of the works there-on to reach a balanced judgement (further to the rest of Part 16).

Whilst we note that it is proposed the works could be detailed to take account of buried remains (ES para's 14.1.2-4) in the absence of any sufficent understanding of the sensitivity or layout of archaeological features on site this appears unlikely to provide the decision maker with sufficent confidence that a proportionate approach to the importance of the remains on site will be deliverable.

The assertion in para 14.2.1 of the ES that there is 'no evidence to date' is inconsistent with the our advice letter of 06/05/2025 citing the annotation to the 1958 ordnance survey mapping 'Roman-British Remains Found' and the appended 'Archaeological Heritage Assessment' in particular at section 7 where there is explicit reference to



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Roman period ceramincs visible in the ploughsoil at time of walkover.

We again refer you to the expertise of your authority's archaeological advosors regarding appropriate and necessary pre-determination assessment further to para's 207 and 208 of the NPPF.

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 of the NPPF.

In determining this application you should bear in mind the statutory duty of section 38(6) of the Planning and Compulsory Purchase Act 2004 to determine planning applications in accordance with the development plan unless material considerations indicate otherwise.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely

Tim Allen

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