

MEMO

**North
Lincolnshire
Council**

TO: TANYA COGGON, DEVELOPMENT MANAGEMENT
FROM: ALISON WILLIAMS, HISTORIC ENVIRONMENT RECORD
REF: PA/SCR/2022/2
DATE: 21/03/2022

SUBJECT: EIA screening request relating to the reduction of the permitted red line boundary in relation to PA/2015/0396, Lincolnshire Lakes, land off Burringham Road

PARISH: ASHBY PARKLANDS

SUMMARY OF ADVICE

- Thank you for consulting the HER on this screening request
- The proposed development has the potential to impact non-designated heritage assets and their settings including known and potential archaeological remains, geoarchaeological and palaeoenvironmental deposits
- Irrespective of Schedule 2 criteria for EIA that relate to Cultural Heritage and Archaeology a Statement of Heritage Significance for all heritage assets will be required with any planning application for this proposal in accordance with NPPF policy 194 and local planning policies
- The Heritage Statement should comprise the following assessments:
 - Desk based assessment including consultation of the Historic Environment Record and other sources
 - **RESULTS** of archaeological field evaluation including geoarchaeological and palaeoenvironmental assessment, geophysical survey and trial trenching
 - Assessment of significance including the contribution of settings
 - Impact of proposals and justification of any harm
 - Mitigation proposals
- Measures to enhance and conserve the heritage assets and their settings should inform the planning and design of the development
- Mitigation measures should be detailed in the application including the provision of written schemes of investigation for further archaeological work as may be necessary
- Further scoping advice is provided below.

HISTORIC ENVIRONMENT RECORD (HER) FUNCTION: To hold, maintain, interpret and manage heritage information, enhancing the understanding of the area's historical development as a distinctive and attractive place. HER information provides source material for interpretation by heritage professionals and for use by community groups and individuals. The HER database is updated as new information about the historic environment is discovered.

The HER also provides advice on development proposals that affect, or may affect, the sites and settings of all heritage assets i.e. designated and non-designated historic buildings, archaeological sites and monuments, and historic places, areas and landscapes. This advice is provided against saved local plan policies and national historic environment policies. See <https://www.northlincs.gov.uk/planning-and-environment/historic-environment-and-conservation/>

DETAILED ADVICE: Thank you for consulting the HER on this screening request. The Covering Letter refers to Heritage and Archaeology, and in respect of the latter refers to the applicant's intention to submit a Written Scheme of Investigation (WSI) for archaeological and palaeoenvironmental works with a full planning application.

This is a concern as I have repeatedly advised that it is the results of this work that are required to inform the planning application. This process of undertaking preapplication evaluation prior to submission and determination of full details is set out in the archaeology conditions attached to the outline permission for the site PA/2015/0396 and will therefore apply to a full planning application and the decision-making.

Archaeological Interest

There are a number of designated and non-designated heritage assets within the vicinity of the development site, however it is agreed that the proposals are unlikely to have 'significant effects' as defined in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, as it relates to cultural heritage and archaeological matters.

The HER database has been checked and our records indicate that the proposed development has potential for direct and indirect effects on known and potential non-designated heritage assets of archaeological interest and their settings. These heritage assets include known and potential archaeological remains of prehistoric to post-medieval date and associated palaeo-environmental evidence buried with the underlying stratigraphy of sands, peat and warp deposits. These deposits have the potential to contain well-preserved archaeological structures and artefacts as well as palaeoenvironmental evidence that can inform the archaeological record, through to evidence of the post-medieval drainage and warping of the former low-lying marshland.

A number of significant Bronze Age finds have come from Burringham Common including a hoard of rapiers and a spearhead, a superb bronze shield as well as a hoard of bronze axes from the riverbed at Keadby Bridge.

Archaeological investigations have recently been undertaken in this part of the Trent valley including on the Lake 1 site, the southern part of which lies within the proposed development site, and the proposed M181 terminal roundabout and slip roads adjacent to the proposed site. These investigations have revealed that considerable depths of peat are present at shallow depth below ground level to the east of the M181; radiocarbon dating of the peat reveals intermittent formation from the Neolithic through to the Medieval periods.

All these deposits have potential to contain archaeological remains, ranging in date from the Upper Palaeolithic pre-peat landscape, organic and inorganic artefacts within the prehistoric peats, to the 18th/19th century warping structures

Given this evidence, there is the potential that the site area contains archaeological remains the significance of which is not yet known that would be disturbed and/or destroyed by the proposed development.

Irrespective of whether EIA is carried out under the Regulations, and where a planning application is to be made for this proposal, a detailed heritage assessment that includes the results of archaeological field evaluation will be required in view of the heritage assets affected and the archaeological potential of the site; this is in accordance with policy 194 of the NPPF, Core Strategy CS6 and saved Local Plan policies HE8 and HE9.

Relevant Policy

The National Planning Policy Framework (NPPF, 2021) provides guidance to local authorities for conserving and enhancing heritage assets and their settings, which includes archaeological sites and remains. Paragraph 8 refers to the role of the planning system to contribute to achieving sustainable development under three overarching objectives; economic, social and environmental. The environmental objective includes contributing to protecting and enhancing the historic environment.

Section 16 (paragraphs 189-208) of the NPPF details the government's approach to conserving and enhancing the historic environment. Paragraph 189 describes heritage assets as '**an irreplaceable resource**' to be '**conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations**'.

Paragraph 194 requires an applicant to submit information that identifies any heritage asset that their proposals may affect, and that assesses the significance of the assets including the contribution of their settings. Consultation of the local HER is the minimum requirement in this process. Paragraph 194 states that '**Where a site on which development is proposed includes, or has the potential to include, heritage assets of archaeological interest, local planning authorities should require developers to submit an appropriate desk based assessment and, where necessary, a field evaluation.**'

This information allows the planning authority to make an informed and reasonable decision in line with the NPPF as well as local planning policies including policy CS6 of the North Lincolnshire Core Strategy and saved local plan policy HE9 Archaeological Evaluation, which states that '**Planning permission will not be granted without adequate assessment of the nature, extent and significance of the remains present and the degree to which the proposed development is likely to affect them.**'

Core Strategy policy CS6 states that '**The council will seek to protect, conserve and enhance North Lincolnshire's historic environment as well as the character and setting of area of acknowledged importance including historic buildings, conservation areas, listed buildings (both statutory and locally listed), registered parks and gardens, scheduled ancient monuments and archaeological remains....Development proposals should provide archaeological assessments where appropriate.**'

Policy HE9 Archaeological Evaluation states that '**Where development proposals affect sites of known or suspected archaeological importance, an archaeological assessment to be submitted prior to the determination of a planning application will be required. Planning permission will not be granted without adequate assessment of the nature, extent and significance of the remains present and the degree to which the proposed development is likely to affect them.**

Sites of known archaeological importance will be protected. When development affecting such sites is acceptable in principle, mitigation of damage must be ensured and the preservation of the remains in situ is a preferred solution. When in situ preservation is not justified, the developer will be required to make adequate provision for excavation and recording before and during development.'

Heritage Assessment – Scoping Advice

Any planning application submitted for this proposed development will need to be accompanied by a heritage assessment prepared in line with the HER advice in this memo. The assessment must be informed by the results of archaeological field evaluation contrary to the proposal in the applicant's Covering Letter that only a WSI would be submitted with a planning application.

A suitably experienced heritage specialist should carry out the following assessment on the applicants behalf and it should comprise the following stages:

1. Desk Based Research

- Consultation of the North Lincolnshire HER and other relevant historic environment resources to collate and synthesise the available information of heritage assets of archaeological interest within 500m of the site boundary to provide the archaeological context for the subsequent fieldwork, including appropriate research objectives. Sources should include local and national

- databases; local archives; historic maps and plans; assessment of aerial photographs, drone survey and LIDAR data; geo-technical and geo-archaeological data and other published and unpublished documents;
- Geo-archaeological assessment of existing data for the site to produce a preliminary deposit model of the sub-surface of the application site and identify gaps for further investigation
- Site visit to identify the presence of, or potential for, any above or below ground heritage assets within the development area, and any constraints on archaeological fieldwork
- The results of this preliminary stage should be summarised in the written specification for the following fieldwork, and presented in the final Heritage Statement;

2. Pre-Application Field Evaluation

- Hand augering or machine drilled purposive coring to fill identified gaps in the deposit model, to identify and model the deposit sequence and former land surfaces, and provide an understanding of the development of the landscape; and to obtain appropriate samples for assessment of preservation potential and the potential for palaeo-environmental evidence to inform the archaeological record including all relevant palaeo-environmental indicators and provision for a programme of scientific dating of the deposit sequence as appropriate.
- Archaeological monitoring and recording during geo-technical investigations on the site.
- Geophysical magnetometry survey of the proposed site to identify and plot anomalies of potential archaeological origin.
- Excavation of sample trial trenches to determine the nature, extent, state of preservation and importance of any archaeological remains, such as those associated with peat deposits and the pre-peat landscape.
- Specifications for field evaluation should be agreed with the HER

3. Assessment of Significance

- Assessment of the significance of those heritage assets and their settings likely to be directly or indirectly impacted by the development; the assessment of the significance of heritage assets will take account of the combined results of all the preceding stages of desk based assessment and site field evaluation, and be based on the heritage values set out in *Conservation Principles, Policies and Guidance for the sustainable management of the historic environment*, Historic England, 2008 <https://www.historicengland.org.uk/images-books/publications/conservation-principles-sustainable-management-historic-environment/>.

4. Assessment of Impact

- Assessment of impact of the proposed development on the significance of the heritage assets based on the findings of the preceding stages, with reference to details of proposed or indicative construction ground works, including site preparation works, flood and drainage strategies, and landscaping proposals. In the case of substantial harm or loss of significance, the relevant tests in the NPPF should be applied.

5. Mitigation

- An explanation of any measures taken to avoid, minimise or mitigate any harm to the significance of the heritage asset/s, including within their settings.
- Where harm is unavoidable, measures to offset the harm to significance should be included; in the case of archeological remains these measures should be set out in a Written Scheme of Investigation (WSI) detailing the scope, methodologies and timelines of an appropriate programme of archaeological work.

The Chartered Institute for Archaeologists has published Standards and Guidance for archaeological work (<http://www.archaeologists.net/>) and has details of Registered Organisations that may be available to undertake the heritage assessment on your behalf, see <http://www.archaeologists.net>. Historic England also publishes professional heritage guidelines (<https://www.historicengland.org.uk/images-books/publications>).

On completion of **ALL** stages of the assessment and field evaluation set out above, a Heritage Statement should be prepared. The Heritage Statement should consider what the impact of the development on the significance of the heritage assets will be together with a statement of justification of why the works would be desirable or necessary, including any benefits which justify any resulting harm. In the case of substantial harm or loss of significance, the tests in the NPPF should be applied.

If the assessment demonstrates that the significance of heritage assets will be adversely affected by the proposals, then appropriate mitigation measures should be drawn up to conserve them. This may include avoiding or minimizing effects to areas of significance, if necessary by modifying the layout and/or design of the proposals ie. In situ preservation. Alternatively, where loss of heritage assets as a result of development is considered justified, provision should be made to record the evidence before it is lost either in advance of, or during, development.

Mitigation measures should be detailed in the application, including the provision of Written Schemes of Investigation (specification) for further archaeological excavation and recording, as may be necessary. Where planning permission may subsequently be granted, the implementation of appropriate mitigation measures can be secured by condition.

Where a Mitigation WSI is required but is not submitted for consideration with the application, it will be necessary to agree pre-commencement conditions with the applicant to secure the submission and the implementation of a scheme, to be agreed with the planning authority.

Clearly, it is beneficial to all parties if the heritage assessment is undertaken at the earliest opportunity and can inform the development of the proposed application. I would be grateful therefore if you would pass this advice to the applicant or their agent. I can provide further advice on the scope and results of the heritage assessment.

Recommendation

Any planning application submitted for this site would need to be accompanied by a Heritage Statement as set out above to accord with paragraph 194 of the NPPF, Core Strategy CS6 and saved Local Plan policy HE9.

An application without such a heritage statement should not be validated. Where a heritage statement is incomplete or inadequate, the HER will advise the local planning authority to defer determination of a planning application until sufficient information is available to allow an informed decision.

Alison Williams
Historic Environment Officer
Alison.williams@northlincs.gov.uk