

MEMO

**North
Lincolnshire
Council**

TO: ED SENIOR, DEVELOPMENT MANAGEMENT
FROM: ALISON WILLIAMS, HISTORIC ENVIRONMENT OFFICER
REF: PA/2023/1124
DATE: 16/01/2025

SUBJECT: Planning permission for the development of 599 No. dwellings and lake, along with associated infrastructure, including landscaping, public open space and play area, pedestrian and cycle links, pumping station and sub-station. Lincolnshire Lakes, Land east of M181 and north of Burringham Road, Scunthorpe

SUMMARY OF ADVICE

- With reference to my consultation response dated 10 April 2024, the applicant submitted the report of Archaeological Evaluation by Trial Trenching on 16 April 2024
- The applicant subsequently submitted a Written Scheme of Investigation (WSI) for Archaeologically Controlled Excavation & Watching Brief (11 October 2024)
- The WSI sets out the measures to off-set the harm to archaeological and palaeoenvironmental remains that the construction of this development may physically or indirectly affect
- These measures accord with my advice for archaeological mitigation set out in the previous memo, and the archaeological methodologies and process specified in the WSI are satisfactory
- Historic England has raised concern regarding the timescale allocated for pre-construction archaeological excavations; this may be strictly controlled by condition requiring the submission of appropriate contingency measures
- As such, I have no further objection to the determination of the application
- Should the planning authority consent the application, any permission should be subject to conditions securing the implementation of the archaeological WSI and suggested planning conditions are provided below
- This procedure is in accordance with paragraphs 216 and 218 of the NPPF, and local planning policies CS6 and HE9.

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 the further opportunity to comment on this application and the various documents, plans and drawings submitted since my previous consultation response dated 10 April 2024.

These documents include the report of Archaeological Evaluation by Trial Trenching (16 April 2024) referred to in my previous memo, and the subsequent Written Scheme of Investigation (WSI) for Archaeologically Controlled Excavation & Watching Brief that the applicant submitted on 11 October 2024.

It is understood that the applicant will also be constructing the link road and roundabout east of the new junction on the M181 to serve the southern access to residential development. It is noted that there is a separate archaeological WSI for the road construction secured and to be implemented as a condition of planning permission ref: PA/2017/1386.

Other details of relevance to the archaeology of the site submitted with the current application recently include the specification for the dimensions of the proposed lake which remains subject to late design changes, and a timeline for the various phases of the construction. The latter is set out in the applicant's Supporting Letter dated 28 November and referred to as an addendum to the Construction Management Plan, however I can find no such CMP amongst all the other published application documents.

Historic England has raised concern in their response dated 19 December 2024 regarding the timescale allocated in the Supporting Letter for pre-construction archaeological excavations that they consider to be potentially insufficient if significant and well-preserved archaeological remains are uncovered during the excavation of the lake. Historic England advise that *'the developer and their building, groundworks and archaeological contractors should have contingency plans and resourcing in place should particularly complex/sensitive/important remains be found.'*

The submission of such a contingency plan as an addendum to the WSI could be conditional on any planning permission that may be granted for this application.

As such, the information as submitted to date is sufficient for the local planning authority to determine the application in accordance with the national and local planning policies relating to the historic environment.

The following assessments of significance and impacts of the development are reiterated from my previous memo.

ASSESSMENT OF SIGNIFICANCE

The Archaeological Evaluation report demonstrates that although no archaeological remains were found within the excavated trial trenches and test pits, these sampled only a small percentage of the overall site area and there continues to be some potential for waterlogged remains within the peat and organic-rich sediments present across the site, as well as within the underlying sands.

The deposit modelling of the stratigraphy across the site and wider Lincolnshire Lakes area, and of radiocarbon dates of the peat from previous investigations, indicates that archaeological remains dating from the Mesolithic to the Bronze Age are possible, especially within the Bronze Age accumulations of peat and at the margins of these deposits where the sands rise and formed dryland islands.

In addition, previous work established the palaeoenvironmental potential of the deposits to provide evidence for human activity, climatic and landscape reconstruction of the Trent floodplain across this chronological framework.

The results demonstrate that the application site has the potential to contain archaeological, geoarchaeological and palaeoenvironmental remains with high evidential value and the potential to inform on the national research framework for the Mesolithic period and the regional East Midlands research agendas and objectives [East Midlands Historic Environment Research Framework - East Midlands Historic Environment Research Framework \(researchframeworks.org\)](https://researchframeworks.org).

IMPACTS OF DEVELOPMENT

The impacts of the proposed development on the known and potential archaeological, geoarchaeological and palaeoenvironmental resources of the site are set out in the evaluation report (Appendix 8, section 6.4). These impacts include the major residential construction such as foundations and piling and associated infrastructure, drainage and pumping strategy, and the creation of an artificial lake (formerly the southern half of Lake 1, ref PA/2016/1736), encompassing most of the application site.

The artificial lake is proposed to be at least 2.20m deep (KPLL-AWP-ZZ-XX-SK-C-0008_P1 - Proposed Lake Section - Alternate Shallow Lake Option) although it is understood that this may be subject to further design change and will involve significant truncation of sub-surface superficial deposits including all the organic-rich sediments and sands within the impact depth.

The geoarchaeological assessment also identifies that there will be secondary impacts affecting the sub-surface hydrology of the site by piling and remodelling of the surface topography as part of flood mitigation and SuDs. The peat deposits, located close to the present-day surface that are likely preserved through irregular water saturation, are particularly sensitive to changes to the sub-surface hydrology. The area surrounding the artificial lake will require a well point dewatering, which will significantly impact the sub-surface hydrology for a large area.

Whilst no archaeological remains were recorded during the trial trenching other than linear cuts representing channels and drains associated with the man-made warping to create fertile agricultural land from the mid-19th century, and/or field boundaries from this period, the warp and sands may mask archaeological deposits of significance and make archaeological prospection difficult. The area is considered to retain the potential to preserve earlier archaeological remains such as discrete areas of prehistoric material and artefacts given the large scale of the development area in relation to the investigations carried out.

The organic-rich deposits (peats) have been shown to be present throughout the site at a range of near-surface depths (within 1.00m BGL). Radiocarbon dating undertaken during previous archaeological investigations in this area (including for the former Lake 1 project and the M181 northern junction) has demonstrated the organic peats span at least the Mesolithic into the later Bronze Age (c.7000 – 1500 BC).

Previous palaeoenvironmental assessment have demonstrated that these deposits can provide insights into past vegetation change, landscape reconstruction, climate, human influence, and potential land use over this prolonged period. The impacts of the proposed development on the sub-surface hydrology will result in the physical degradation and destruction of the peats across an increasing area and the palaeoenvironmental evidence it contains.

Paragraph 216 of the NPPF directs local planning authorities that in the case of non-designated heritage assets, a balanced judgement is required having regard to the scale of any harm or loss and the significance of the heritage asset. The archaeological significance of the application site and the impact of development should therefore inform the determination of this application.

There are no identified archaeological remains within the site that merit preservation in situ or are a constraint on development. However, whilst there are no reasons to object to the principle of development on archaeological grounds, it will be important to ensure that any harm to currently unidentified archaeological remains that the development may affect is off set through a programme of preservation by record and community benefit.

I previously advised that the archaeological programme for mitigation should comprise the following elements:

- Archaeologically controlled excavation and monitoring of the artificial lake to ensure the identification, recording and recovery of archaeological, geoarchaeological and palaeoenvironmental evidence.
- Archaeological monitoring and recording of ground excavations for the residential development and associated infrastructure; the extent of the monitoring will be dependent on further detailed information relating to the impact depths and should be kept under review during the development.
- Programme of palaeoenvironmental assessment and analysis of deposits of high palaeoenvironmental potential as previously identified for the former Lake 1 proposal now the Keepmoat artificial lake.
- On completion of identified stages of the archaeological site works relating to separate phases of construction and timescales, completion statements and post-excavation assessment report/s will be submitted to the HER and planning authority with updated proposals for further analysis and the publication of results as appropriate.
- On completion of the programme, the physical and digital archaeological archive will be deposited with the North Lincolnshire Museum Service and the Archaeological Data Service respectively.
- Proposals for the presentation of significant results to the public such as provision of interpretation board/s within the development site, inclusion of information leaflets in new home packs, educational material for use in local schools etc. North Lincolnshire Museum Education service should be consulted for their specialist knowledge and input. The proposals should include an outline of contents and timetable for production, installation and completion in relation to the development phases and construction programme.

Accordingly, on 11 October 2024 the applicant submitted a Written Scheme of Investigation (WSI) for Archaeologically Controlled Excavation & Watching Brief prepared by MAP Archaeological Practice Ltd.

The WSI sets out appropriate measures to off-set the harm to archaeological and palaeoenvironmental remains that the construction of this development may physically or indirectly affect and details the archaeological methodologies and process to achieve this outcome in accordance with the above advice.

These measures are considered satisfactory except for the lack of provision of a contingency plan should significant archaeological remains of particularly complex, sensitive or important nature be encountered either during the archaeological work on the site of the lake, or subsequently during construction of the housing. As Historic England highlight, such remains may require detailed and time-consuming excavation, recording and recovery, and require additional resources.

The applicant should submit appropriate contingency plans and timetable, as an addendum to the WSI, at their earliest opportunity to ensure that all parties are aware of such risks and requirements and that management measures are in place to deal with such eventualities.

With the appropriate measures in place, I have no further objection to the determination of the application. The archaeological considerations should inform the planning decision and be given due weight in the planning balance in accordance with paragraphs 216 and 218 of the NPPF, and with local planning policies for the historic environment including CS6 and HE9.

PLANNING CONDITIONS

There are no archaeological reasons to object to the planning application subject to planning conditions securing the implementation of the agreed programme of archaeological works and of an appropriate archaeological contingency plan.

Should the planning authority grant permission for this application I would be grateful if the following conditions are attached to any consent, to secure the implementation of the agreed archaeological mitigation strategy set out in the agreed WSI and for the submission of an archaeological contingency plan:

Condition 1

No development shall take place until the applicant or their successors in title has commissioned and secured the implementation of the approved Written Scheme of Investigation for archaeological

controlled excavation and watching brief (MAP Archaeological Practice Ltd, Oct 2024), and until they have submitted an archaeological contingency plan that includes the following details to the local planning authority for their written approval prior to any archaeological work commencing:

- i. Contingency measures to ensure the preservation in situ or by record of archaeological remains requiring additional time or resources to mitigate in a manner proportionate to their significance
- ii. A timetable of works in relation to the proposed development, including sufficient notification and allowance of time to ensure that the site work is undertaken and completed in accordance with the approved WSI and contingency measures

Reason

To preserve by record any archaeological remains identified within the site in accordance with paragraph 218 of the NPPF, policy CS6 of the Core Strategy, and saved policy HE9 of the North Lincolnshire Local Plan.

Condition 2

The applicant shall notify the HER and planning authority in writing of the intention to commence each stage of the archaeological site works referred to in the mitigation WSI at least 10 days before commencement. Thereafter, the archaeological programme shall be carried out in accordance with the details and timings in the approved WSI and the contingency plan. The archaeological programme shall not be considered complete until the post-excavation assessment and any further analysis or conservation proportionate to the significance of the results has been completed, and until the publication and dissemination of the results and archive deposition is secured.

Reason: To preserve by record any archaeological remains within the development site in accordance with paragraph 218 of the NPPF, policy CS6 of the Core Strategy, and saved policy HE9 of the North Lincolnshire Local Plan.

Condition 3

A copy of any analysis, reporting, publication, or archiving required as part of the approved mitigation strategy shall be deposited at the North Lincolnshire Historic Environment Record and the archive at the North Lincolnshire Museum within 18 months of the commencement of the archaeological programme of work or such other period as may be agreed in writing by the local planning authority.

Reason: To preserve by record any archaeological remains within the development site in accordance with paragraph 218 of the NPPF, policy CS6 of the Core Strategy, and saved policy HE9 of the North Lincolnshire Local Plan.

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