

# MEMO

**North  
Lincolnshire  
Council**

**TO:** SCOTT JACKSON, DEVELOPMENT MANAGEMENT  
**FROM:** RICHARD GODDARD, HISTORIC ENVIRONMENT RECORD  
**REF:** PA/2025/1542  
**DATE:** 23/01/2026

**SUBJECT:** Planning permission for the change of use of an agricultural field to garden centre operations including relocation of customer parking and the construction of two polytunnels

**PARISH:** BARTON UPON HUMBER

## SUMMARY OF ADVICE

- The application site lies within an area where archaeological remains of prehistoric and Roman date can be anticipated
- A programme of archaeological monitoring and recording should be undertaken during all groundwork to offset the harm to any archaeological remains that may be disturbed or destroyed by construction and any associated BNG works
- A Written Scheme of Investigation (WSI) detailing the archaeological work to be undertaken should be submitted prior to determination of the planning application
- Where the planning authority is minded to grant consent, any permission should be subject to conditions securing the implementation of an agreed WSI; pre-commencement conditions would only be necessary where an agreed WSI is not in place.

**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 application.

## HERITAGE POLICY

Paragraphs 207 & 208 of the National Planning Policy Framework (NPPF, 2024) require an applicant to submit sufficient information about the significance of any heritage assets that their proposals may affect that allows the local planning authority to assess the degree of impact on heritage assets and their settings, and how this impact may be mitigated, if at all; paragraph 207 states that consultation of the HER is a requirement of this assessment process.

Effects of an application on non-designated heritage assets are a material consideration and local planning authorities are directed to have regard to the scale of any harm or loss and the significance of the heritage asset when judging the planning balance (NPPF 216).

Where loss of heritage assets as a result of development is considered justified, paragraph 218 of the NPPF states that the *'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 [within the Historic Environment Record]'*. This procedure also accords with saved Local Plan policy HE9.

## ARCHAEOLOGICAL INTEREST AND ASSESSMENT

Our records show that the application site is located in an area where archaeological remains of prehistoric and/or Roman date can be anticipated. The application site is on agricultural land where archaeological features would survive beneath the plough soil and disturbed finds may be present within the topsoil. Any groundwork associated with the proposed development such as soil stripping and the excavation of foundation, drainage and service trenches has the potential to disturb or destroy archaeological evidence and the significance of any such remains.

The HER does not wish to object to the application provided that appropriate mitigation measures to conserve the archaeological evidence of the site are adopted. Such measures should comprise a programme of monitoring, excavation and recording during any groundworks associated with the proposals. This is commonly known as a 'watching brief'. The archaeological fieldwork would be followed by post-excavation assessment, reporting, analysis and publication of any results as required.

A suitably qualified archaeological contractor should undertake this work on the developer's behalf in accordance with a Written Scheme of Investigation (WSI) submitted to and agreed with the planning authority in advance of any development commencing.

Where the mitigation WSI 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 suitable scheme, to be agreed with the planning authority prior to development commencing.

I would be happy to advise the developer on the content of a WSI that would deal with the anticipated archaeological deposits, or advise on a specification produced by the developer's archaeologist. All archaeological work should be undertaken in accordance with the relevant Chartered Institute of Archaeologists' Standards and Guidance ([www.archaeologists.net](http://www.archaeologists.net)) and relevant Historic England professional guidelines (<http://www.historicengland.org.uk/images-books/publications/>).

## RECOMMENDATION

As the application currently stands, **pre-commencement planning conditions will be required** where the planning authority is minded to grant permission for this application. To avoid the imposition of such conditions, the applicant should submit an appropriate WSI before the determination of the application, in accordance with the requirements of the NPPF 218 and Local Plan policy HE9.

Where a WSI is not received before a determination, the provision for this archaeological work programme can be accommodated by the standard conditions and so I would be grateful if the following wording could be added to any permission that may be granted:

**Condition 1**

No development shall take place until the applicant, or their agents or successors in title, has secured the implementation of an archaeological mitigation strategy, to be defined in a Written Scheme of Investigation that has been submitted to, and approved in writing, by the local planning authority. The strategy shall accord with a brief provided by North Lincolnshire Historic Environment Record and shall include details of the following:

- i. Measures to ensure the preservation by record of archaeological features within the footprint of the development
- ii. Methodologies for the recording and recovery of archaeological remains including artefacts and ecofacts.
- iii. Post-fieldwork methodologies for assessment and analyses.
- iv. Report content and arrangements for dissemination, and publication proposals.
- v. Archive preparation and deposition with recognised repositories including the ADS.
- vi. 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 strategy.
- vii. Monitoring arrangements, including the notification in writing to the North Lincolnshire Historic Environment Record Office of the commencement of archaeological works and the opportunity to monitor such works.
- viii. A list of all staff involved in the implementation of the strategy, including sub-contractors and specialists, their responsibilities and qualifications.

**Reason**

To comply with paragraph 218 of the NPPF, policy CS6 of the Core Strategy, saved policy HE9 of the North Lincolnshire Local Plan because the site potentially contains archaeologically significant remains that the development would otherwise destroy. The implementation of the archaeological mitigation strategy is required in order to preserve archaeological evidence by means of a comprehensive record and creation of a permanent archive, to advance public understanding. The archaeological mitigation strategy must be prepared and approved for implementation prior to the commencement of any groundwork within the application site that would otherwise result in destruction without record.

**Condition 2**

The applicant shall notify the planning authority in writing of the intention to commence the archaeological site works at least 7 days before commencement. Thereafter, the archaeological mitigation strategy shall be carried out in accordance with the approved details and timings. No variation shall take place without the prior written consent of the local planning authority.

**Reason**

To comply with paragraph 218 of the NPPF, policy CS6 of the Core Strategy, saved policy HE9 of the North Lincolnshire Local Plan

**Condition 3**

The new facilities shall not be utilised until any post-investigation assessment has been commissioned in accordance with the programme set out in the approved written scheme of investigation, and provision made for analysis, publication and dissemination of results and archive deposition has been secured.

**Reason**

To comply with paragraph 218 of the NPPF, policy CS6 of the Core Strategy, saved policy HE9 of the North Lincolnshire Local Plan

**Condition 4**

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

**Reason**

To comply with paragraph 218 of the NPPF, policy CS6 of the Core Strategy, saved policy HE9 of the North Lincolnshire Local Plan

I trust this recommendation is acceptable.

**Richard Goddard**  
**Historic Environment Officer**  
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