

**NORTH LINCOLNSHIRE LOCAL PLAN (2020-2038)**

**STATEMENT OF COMMON GROUND - NORTH LINCOLNSHIRE  
COUNCIL AND HISTORIC ENGLAND**

**April 2023**

## 1. Introduction

1.1 This Statement of Common Ground has been prepared to identify any outstanding issues between Historic England (HE) and North Lincolnshire Council (NLC). It covers matters relating to the council's Submission Local Plan and representations submitted by HE concerning that document.

1.2 As well as the wider [Statement of Common Ground](#) (DLP22) for the North Lincolnshire Local Plan Historic England requested a separate statement of common ground which identifies the outstanding issues and the current position between NLC and HE.

## 2. Background and Outstanding Issues

2.1 Historic England and the NLC conservation officers and Historic Environment Record have been consulted in the Local Plan process throughout its preparation and some of their comments and suggestions which the council agree with have been incorporated in the drafting of the policies, site allocations and through the Sustainability Appraisal where impacts on the historic environment have been considered.

2.2 HE provided specific comments on the Local Plan via the Regulation 18 Preferred Options, Regulation 19 Publication Draft Consultation, and subsequent Addendum Consultation. However, ongoing discussions have continued between NLC and HE relating to an objection to housing site allocation H1P-25 (Yealand Flats, Epworth) and relating to issues with two proposed Minerals sites. Some changes to policy criteria regarding areas of soundness have already been agreed. Due to the archaeological importance of the Lincolnshire Lakes site, HE consider that a heritage criterion is required in Policy SS7, and a staged process of archaeological investigation based upon deposit modelling is essential.

2.3 HE has stated that they reserve the right at a later stage to comment on or object to any proposals that come forward as part of the Local Plan. Where they have not commented on a site allocation which has current planning approval this is not to say that Historic England will not comment or object during a future consultation should the permission expire. HE advises that local authority archaeology and conservation expertise should be used in relation to all heritage assets for proposed and considered site allocations. This has always been the case.

2.4 Several meetings have been held but the most recent meeting was held between NLC and HE in June 2022 and March 2023 to discuss consultation comments and any outstanding issues prior to submission. Discussions and collaboration are ongoing between the Council and Historic England.

## 3. Issues and Current Position

3.1 There are several outstanding matters briefly discussed above that are particularly relevant for this Statement of Common Ground which are listed below. Further details for each issue is then covered in more detail with a short paragraph outlining the main issue and the current status from each party in Table 1 which follows.

- Housing Site allocation in Epworth H1P-25 Land at Yealand Flats
- Mineral sites- site proposals **MIN6-17** Eastfield Farm, Winteringham (Silica Sand) (New Site) and MIN6-18 Land South of Composition Lane, Winteringham (Silica Sand) (Area of Search)
- Policy MIN8: Restoration, aftercare & afteruse of mineral extraction sites- heritage
- Policy wording for Policy SS7 Strategic Site Allocation- Lincolnshire Lakes

#### 4. Housing Site Allocation in Epworth - Policy H1P-25 Land at Yealand Flats

4.1 The Local Plan Policy H1 Site Allocations lists the council's committed and proposed housing sites for the plan period to 2038. HE advice on the initial site selection methodology was that in order to demonstrate the sites put forward as allocations are compatible with the requirements of the NPPF (and, where relevant, the Duties under the Town and Country Planning Act 1990) there needed to be an assessment of the likely effect that the development of these sites might have upon the historic environment. Historic England suggested that the Council undertake a Heritage Impact Assessment of all the sites which are identified as being likely to affect North Lincolnshire's heritage assets. This work was completed in October 2020 and was based on [Historic England Advice Note 3 The Historic Environment and Site Allocations in Local Plans](#).

4.2 HE has seen and welcomed these Historic Environment Evidence Base documents [North Lincolnshire Local Plan Heritage and Archaeology Impact Assessment](#) (HE02) and [Appendices](#) (HE03) as agreed in bespoke meetings.

4.3 Concerns about housing proposals in Epworth were raised from HE in relation to the Isle of Axholme and settlements within it all being located in an Area of Historic landscape Interest. The Isle of Axholme has been the subject of an intensive study of landscape character commissioned by the former Countryside Commission (now Natural England). The study has identified significant areas of ancient open strip fields and turbaries, both of which are of considerable national importance. These attributes together with enclosed land and the overall settlement pattern of the area make it unique in the country. Epworth is also one of North Lincolnshire's most sustainable large service centres and has not seen any significant growth for some time due to this constraint. However, due to the number of services including a Primary and Secondary School, shops, a doctors' surgery, a regular bus service, and support for growth in this town, a small housing allocation has been proposed to ensure the town can have some limited growth.

4.4 HE still has an outstanding objection in terms of site allocation H1P-25 (Land at Yealand Flats, Epworth) proposed for approximately 45 dwellings. There has been dialogue about alternative sites for Epworth between NLC and HE. HE have stated that not all sites are unacceptable in terms of the historic environment. However, in terms of alternative sites suggested NLC have raised that there are other planning concerns regarding these sites including sites being remote in the open countryside, legal and flood risk issues, and deliverability/availability issues. All the call for sites in Epworth are within the core historic landscape character type of the Ancient Open Strip Fields (AOSF). While the importance of this historic landscape is noted, paragraph 197 of the NPPF refers to applying balanced judgement to consider the scale of any harm or loss and the significance of the heritage asset weighed against the substantial public benefits of development.

#### 5. Mineral Sites - New Site and Area of Search Winteringham

5.1 The Local Plan Policy MIN6: Mineral Sites proposes the sites MIN6-17: Eastfield Farm, Winteringham (Silica Sand) (New Site) and MIN6-18: Land South of Composition Lane, Winteringham (Silica Sand) (Area of Search). HE remain concerned that the Roman town may continue into MIN6-17 and in terms of aesthetic impacts. Together with the assessment required as set out for MIN6-18, if MIN-17 is then considered acceptable, a criterion should also be included for MIN6-17. HE object to site MIN6-18 and in relation to Policy MIN8 Historic England recommend that proposals for restoration should make a positive contribution to heritage assets and their settings, where relevant. The site

MIN6-18: Land South of Composition Lane, Winteringham is located within 20 metres of a Scheduled Monument – the Old Winteringham Roman Settlement, whilst there is potential for archaeological assets on the site. A heritage assessment would be required. The Council has given this further consideration and has proposed to delete these sites as requested.

## **6. Policy MIN8: Restoration, aftercare & afteruse of mineral extraction sites- heritage**

6.1 HE considers an additional criterion should be included, such as ‘to conserve and enhance the setting of heritage assets, where relevant’. Historic England would be very happy to assist with wording. The Council has given this further consideration and has proposed an amendment to the policy to add a criterion as requested.

## **7. Policy SS7 Strategic Site Allocation - Lincolnshire Lakes**

7.1 The Lincolnshire Lakes scheme was originally established in the LDF Core Strategy and Lincolnshire Lakes Area Action Plan (AAP) as a high quality residential, business and leisure location centred around a unique network of lakes, natural water bodies and green infrastructure. The council still recognises the importance of the Lincolnshire Lakes in re-positioning North Lincolnshire as a location for growth and investment. Three new sustainable villages are proposed for allocation in the submission Local Plan to deliver the required 2,150 dwellings.

7.2 Due to the archaeological importance of the site, HE states a heritage criteria is required in this policy , building on their previous engagement. The Council has given this further consideration and has proposed an amendment to the policy to add a criterion, as requested.

<b>Table 1- Outstanding Matters and Latest Position</b>				
<b>Policy / Paragraph</b>	<b>Representation Number</b>	<b>Historic England Comments</b>	<b>North Lincolnshire Council comments</b>	<b>Agreed position</b>
H1P-25 Land at Yealand Flats, Epworth	0896	HE wants the proposed housing site H1P-25 deleting from the Local Plan. Of all the call for sites put forward in Epworth HE state the council proposed site Land at Yealand Flats is the most harmful. The Isle of Axholme contains an extraordinary survival of a historic rural landscape including, in particular, surviving ancient open strip fields which lie in the heart of the isle. The Ancient Open Strip Fields (AOSF) stretch from Haxey to Epworth and Belton. The strip fields are arranged within larger fields. They adjoin the settlements and were communally farmed. The strips are often marked on the land through their narrow width and changes in crop or cultivation, changes in strip direction and/or 'reverse S'	<p>The Council have worked with HE by consulting on all the call for sites received in Epworth to gain their view on which would be the best site in terms of reduced impact on the Historic Landscape. Of all the call for sites put forward in Epworth HE state the council proposed site Land at Yealand Flats is the most harmful. HE suggested discussing sites CSF0300022, BPTX3 and 1TF5R as possible alternatives. Also, eastern parts of 7DB9N and 7UGZF and the previously developed land section of site CFS0300012 together with the car park to the south of the Holmes and garden centre site (CFS0300147). All to be subject of a HIA. The council discounted these sites through the <u>Strategic Housing and Economic Land Availability Assessment (SHELAA)</u> due to other site constraints including being isolated, access and legal issues.</p> <p>As part of the SOCG work HE confirmed in a letter sent to NLC on 23 March 2023 that they would not object to inclusion of the garden centre site to the south of the line shown on an attached map. HE considers this this site would have a less harmful impact on the historic landscape than H1P-25. The council felt it was too late to change the proposed housing allocation at this stage as the plan has been submitted and the site supported by HE had wider issues for consideration including viability, deliverability and the site being proposed for a mixed used site including retail, employment, health centre and older people specialist accommodation rather than just housing. Site CFS0300147 has been submitted as an omission site for a mixed use proposal which goes beyond the red line boundary supported by HE where the majority of the housing (69 dwellings) have been proposed in the supporting plan.</p> <p>The council through the SA, SHELAA, and consultation comments chose one site for a small level of growth in Epworth. The proposed housing site in Epworth is Land at Yealand Flats and to reduce the</p>	<p>An agreement on this proposed housing site H1P-25 Land at Yealand Flats, Epworth cannot be agreed.</p> <p>While the importance of this historic landscape is noted, paragraph 197 of the NPPF refers to applying balanced judgement to consider the scale of any harm or loss and the significance of the heritage asset weighed against the substantial public benefits of development.</p>

		<p>boundaries. Some strips have been amalgamated into larger groups but the open, largely unenclosed landscape remains, as do many narrow, often long, strips with 'soft' boundaries. Some early enclosures adjoining settlements were created as 'rear' crofts or 'home closes', including for livestock. Some of these were historically associated with later farms with farm buildings located on the edge of settlements.</p> <p>The character of this historic landscape remains readily apparent. Around Epworth, this historic landscape forms an important part of the setting of Epworth Conservation Area with the close relationship between the village and landscape being readily apparent. The historic landscape itself is defined in the Local Plan. The</p>	<p>impact of this proposal on the Area of Historic Landscape Interest the site has been reduced from the proposed site at preferred Options of 92 dwellings down to 45 dwellings (1.5ha).</p> <p>This site was initially proposed for housing in the Regulation 18 Preferred Options and also forms part of the LC14 designation in the North Lincolnshire Local Plan (2003) which Policy HE2 Area of Special Historic Landscape Interest replaces in the submitted Local Plan. This includes an area of open field strip (AOFS) within the Isle of Axholme Area of Special Historic Landscape Interest. The Evidence base document <u>Review of the Isle of Axholme landscape character assessment (Ref HE04)</u> concludes that overall there has been limited change in character since the <u>Miller Study (1997)</u>. It is noted that changes in farming methods mean the 'strips' are no longer legible, but this hasn't detracted from the overall character. The review describes the landscape in terms of historic origins and associations. The study acknowledges that pockets of existing development within the field type did not define character types, but if allowed to proliferate could have impact on the character.</p> <p>As there has been a lack of housing provision in Epworth, which has six of the seven key facilities and services and, therefore, one of the most sustainable locations for development, there is a need to meet housing requirement within the settlement. Epworth also has the capacity to accommodate future development based on existing infrastructure, access to facilities and services and levels of public transport. Further details on the allocation process are outlined in the site selection paper. To minimise the impact on the surrounding area, the size of H1P-25 has been reduced from the original proposal at Regulation 18 Preferred Options stage. Following consultation with Historic England there were no reasonable alternative sites identified as being available and deliverable during the plan period in or around the settlement that were deemed to be more suitable for housing. Therefore, in order to meet the need for housing in the area, which has had a notable lack of supply, it was considered by the Council that</p>	
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		<p>proposed site allocation would result in the loss of part of the early enclosure field and be harmful to the historic landscape area defined in the Local Plan (in accordance with policy HE2 and the HIA) through loss of part of the field through development, and loss of key views of the historic landscape (including the Grade II Listed Maws Mill) from one of the main roads coming into Epworth. These views take advantage of the topography to reveal more of the landscape and the prominence of the mill. The loss of these views would harm the contribution that the setting of Maws Mill makes to its significance. The historic landscape area covers the site as shown in the HIA.</p> <p>HE have objected to the site throughout all</p>	<p>this site location was most appropriate, and extension of the development limit is justified within one of the Authority’s most sustainable locations. The allocated site policy H1P-25 as well as Policy HE2, will ensure that the impact on the character of the historic environment will be mitigated accordingly.</p> <p><u>The Settlement Hierarchy and Growth Topic paper (HOU07)</u> explains the rationale and justification for the overall Local Plan Spatial Strategy and why the Plan represents an appropriate Strategy for the area and what alternatives have been considered. The <u>Housing Site Selection Topic Paper (HOU03)</u> explains why housing allocations have been chosen in the locations and sites proposed and any constraints impacting on these proposals. Epworth is considered as a large service centre in which a small distribution of housing growth was supported. The settlement of Epworth is ranked 4th by the Sustainable Settlement Survey (2019 and has services including a Primary and Secondary School, shops, a doctors surgery, and a regular bus service). The settlement has been allocated 57 dwellings (0.8%) which includes 2 committed housing sites totalling 12 dwellings and one proposed housing site. Epworth acts as the main service centre for the southern part of the Isle of Axholme. However, further growth of the settlement is limited by the Area of Historic Interest which surrounds the urban footprint of the town. Hence there is just one housing allocation currently available to minimise this impact but still allow for future growth in this sustainable large service centre.</p> <p>All sites proposed in Policy H1 Site Allocations have been consulted upon at each consultation stage of the Local Plan. They have also been assessed through the Sustainability Appraisal, SHELAA and a housing sites topic paper has been prepared setting out why the proposed allocations have been chosen and why. The Place Planning Team feels this allocation would not result in substantial harm to the historic landscape as there is no obvious strip pattern at the ground level to interpret against historic character. The council have had to</p>	
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		consultations, both formal and informal.	balance the need for development against the impact on the historic landscape and believe it has a limited contribution towards the historic landscape and with Epworth being such a sustainable town needs a housing allocation to meet future needs.	
MIN6-17 Eastfield Farm, Winteringham (Silica Sand) (New Site)	0897, 0920	Historic England objected to sites MIN6-17/18 as set out in their responses.	<p>The Minerals Site Selection Methodology (MIN02) paper sets out how potential mineral sites will be identified and assessed as part of the Local Plan process.</p> <p>The Council has also given further consideration that these were allocations for extraction of silica sand resource- an industrial mineral. The NPPF requires a stock of permitted reserves of this resource is maintained to support the level of actual and proposed investment required for new or existing plant, and the maintenance and improvement of existing plant and equipment. As of 7/1/23 no plant and equipment were present on either site or the site most recently worked there. Furthermore, the possible and also historic use for the sand was indicated to be at the South Ferriby Cement Plant, the indication of resource was unknown, and the proposed working lifespan was also unknown. Operations at South Ferriby Cement Plant have ceased, other than storage and onward distribution of products indicating some doubt as to a possible market for the material.</p>	NLC proposed to delete both allocations MIN6-17 and MIN6-18 from the Local Plan. It may still be possible for the prospective operator to bring forward the working of sand from the sites via the development management process. Historic England welcome this.
MIN6-18 Land South of Composition Lane, Winteringham (Silica Sand) (Area of Search)	0897, 0920, 0898	Historic England objected to sites MIN6-17/18 as set out in their responses.	<p>The <u>Minerals Site Selection Methodology (MIN02)</u> paper sets out how potential mineral sites will be identified and assessed as part of the Local Plan process.</p> <p>The Council has also given further consideration that these were allocations for extraction of silica sand resource - an industrial mineral. The NPPF requires a stock of permitted reserves of this resource is maintained to support the level of actual and proposed investment required for new or existing plant, and the maintenance and improvement of existing plant and equipment. As of 7/1/23 no plant and equipment were present on either site or the site most</p>	It is proposed to delete both allocations MIN6-17 and MIN6-18 from the Plan. It may still be possible for the prospective operator to bring forward the working of sand from the sites via the development management process.



			recently worked there. Furthermore, the possible and also historic use for the sand was indicated to be at the South Ferriby Cement Plant, the indication of resource was unknown and the proposed working lifespan was also unknown. Operations at South Ferriby Cement Plant have ceased, other than storage and onward distribution of products indicating some doubt as to a possible market for the material.	Historic England welcome deletion of the sites.
MIN8 Restoration, aftercare & afteruse of mineral extraction sites-heritage	0921	Proposals for restoration should make a positive contribution to heritage assets and their settings, where relevant. HE considers an additional criterion should be included and suggested the wording to be used.	NLC agree to the proposed suggested change.	Agree to add an additional criterion as a proposed modification stating: <i>'to conserve and enhance the setting of heritage assets, where relevant'</i> . Historic England welcome the addition of this criterion.
SS7 Strategic Site Allocation- Lincolnshire Lakes	0904	Due to the archaeological importance of the site, HE welcome the opportunity to suggest additional wording and suggested the text to be inserted.	NLC have proposed a further modification to the plan to take these comments on board based on HE suggested policy wording.	Agree to add an additional criterion as a proposed modification after Master Planning and Design Section to create a new section called Heritage. Proposed a suggested modification for Policy SS7 to include the section Heritage: <i>The development offers opportunities for the better understanding</i>



				<p><i>and presentation of North Lincolnshire's dynamic wet / dry historic landscapes - characterised by natural and artificial flooding and silting events across millennia. A staged process of archaeological investigation and dissemination of information based upon deposit modelling should be undertaken as part of any proposal and should be reflected within the approved masterplan. A deposit modelling led approach is required to provide effective management of archaeological risks given the complex character of buried landscapes below the superficially flat modern ground surface and to return public value in the understanding and appreciation this landscape."</i></p>
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				Historic England welcome the addition of the agreed wording.
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## 8. Signatories

8.1 In meeting national guidance, relevant parties, i.e., local authorities should sign a Statement of Common Ground and signatories to this statement are:

- Historic England
- North Lincolnshire Council

<b>Historic England</b>	 <b>Signed:</b> <b>Date: 26/04/23</b> <b>Name: Emilie Carr MTCP MRTPI PgDipHEC</b> <b>Position: Historic Environment Planning Advisor</b>
<b>North Lincolnshire Council</b>	 <b>Signed:</b> <b>Date: 26/04/23</b> <b>Name: James Durham MRTPI</b> <b>Position: Place Planning Specialist</b>



