



Land West of Doddington Lane, Stubton, Lincolnshire

Heritage Impact Assessment

Produced for Hilltop Ltd

October 2025

LOCUS

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This survey was commissioned by Hilltop Ltd and thanks are due in this regard. The report was written by Adam Partington of Locus Consulting Ltd.

1 INTRODUCTION

1.1 PROJECT BACKGROUND

- 1.1.1 In October 2025 Locus Consulting Ltd. were commissioned to compile a Heritage Impact Assessment to accompany an appeal by the written representation route, for the proposed development of Land West of Doddington Lane, Stubton at National Grid Reference SK 87271 48680, (henceforth 'the Site').
- 1.1.2 The application for outline planning permission (henceforth 'the Application') was refused by South Kesteven District Council on the 26th September, 2025. The Application (REF: S25/1033) was refused on the basis of a single Reason for Refusal (henceforth 'the RFR') associated with its impact upon an area of ridge and furrow earthworks which appear to have been identified as a non-designated heritage asset during the course of determining the Application.
- 1.1.3 In accordance with Good Practice Advice Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015) this assessment considers the nature, level and extent of heritage assets within the Site and its environs that might be impacted upon by the proposed development.
- 1.1.4 By way of introduction, the author of this report is Adam Partington BA hon, MSc. I am Director of Locus Consulting, a national and regional RTPI award winning heritage planning consultancy established in 2015. I have over 20 years' experience in the heritage sector, both within local authority and private practice. I am an expert witness at Public Inquiry and planning hearings, and have run national training schemes on behalf of Historic England to build capacity within local authority teams on matters of planning with heritage assets for over 8 years. I have degrees in related fields including a BA hon in Geography and Archaeology BA hon (University of Nottingham) and a MSc in Professional Archaeology (University of Oxford). I have published works on the characterisation of historic places and co-authored The Historic Character of The County of Lincolnshire (Lord and MacIntosh, with contributions from Partington, 2011) and the Greater Lincolnshire Historic Farmstead Assessment Framework (Historic England, 2015).
- 1.1.5 For a full assessment methodology, please see Appendix 1: Assessment Methodology.

1.2 THE APPLICATION

- 1.2.1 Proposed works include the construction of up to 4 dwellings with associated access and landscaping on land to the west of Doddington Lane. To the south of the dwellings, the Site also includes an extensive area for Biodiversity Net Gain (BNG).
- 1.2.2 An indicative site plan was submitted as part of the Application and this has been used as an indication for evaluating the impact of the proposed scheme.
- 1.2.3 For full specifications and plans please refer to the appeal submission.



Figure 1 Site Location and proposed layout, image courtesy of Steven Dunn Architects

1.3 SCOPE OF STUDY

1.3.1 The scope of this study is guided by the RFR and Historic England Advice Note 12: Statements of Heritage Significance: Analysing Significance in Heritage Assets.

1.3.2 The primary objectives of this study are to:

- Describe the heritage significance of heritage assets that might be directly or indirectly impacted upon by the proposed development;
- Assess the degree of impact of the proposed development upon the significance of heritage assets;
- Review the impact of the proposed development in respect of the prevailing framework of policy and legislation.

1.3.3 Research sources consulted for this study comprise published references and maps, including the Stubton Neighbourhood Plan (Stubton Parish Council, Stubton Neighbourhood Plan, 2014), Stubton Parish Landscape Assessment (Allen Pyke Associates, 2013), and South Kesteven Landscape Character Assessment (South Kesteven District Council, 2007).

1.3.4 Online resources were consulted where available and included (but not limited to):

- National Heritage List for England, an up to date list of Designated Heritage Assets, excluding Conservation Areas (<https://historicengland.org.uk/listing/the-list/>)

- Britain from Above (<https://www.britainfromabove.org.uk/>) for aerial photograph coverage
- The National Library of Scotland (<https://maps.nls.uk/geo/>) and Old-Maps (www.old-maps.com) for a range of maps from 1851 to the present day
- Historic England Archives Image and Book Collection (<https://historicengland.org.uk/images-books/>)
- Open Domesday, a free online copy of the Domesday Book (<https://opendomesday.org/>)
- Key to English Placenames, an up-to-date guide to the interpretation of the names of England's cities, towns and village held by the University of Nottingham (<http://kepn.nottingham.ac.uk/>)
- Trade and Business Directories held by the University of Leicester (<http://specialcollections.le.ac.uk/digital/collection/p16445coll4>)
- Census records accessed online via Genealogist.co.uk

1.3.5 A Site visit was undertaken on 7th October 2025. The weather was fine with intermittent cloud cover, and visibility was clear.

1.4 PLANNING CONTEXT

LEGISLATION AND NATIONAL POLICY

1.4.1 There is national policy and guidance relating to the protection and treatment of the historic environment within the development process. These identify the historic environment as a non-renewable, fragile, and finite resource and place priority upon its conservation. This includes the setting out of appropriate assessment to ensure damage or loss to the resource is permitted only where it is justified.

1.4.2 The National Planning Policy Framework (NPPF), last published in 2024, sets out the UK Government's requirements for the protection and enhancement of the historic environment, and should be read in conjunction with the accompanying National Planning Policy Guidance (NPPG). The national policy relevant to this assessment is detailed in Appendix 2.

LOCAL PLANNING POLICY

1.4.3 Local planning authorities are responsible for implementing the requirements articulated by legislation and the NPPF as regards the protection of the historic environment on a local level, and the formulation of policies to support this obligation. The Site and its environs are located within the South Kesteven District Council (SKDC) jurisdiction, which is currently subject to policies set out within Appendix 2.

1.4.4 The Stubton Neighbourhood Plan was 'made' in 2014, and policies within the Plan are material consideration in planning decisions.

PLANNING PRACTICE GUIDANCE

1.4.5 Planning Practice Guidance (PPG) was last updated in 2019. Paragraphs of most relevance to the Application include:

- 005 Reference ID: 18a-005-20190723
- 006 Reference ID: 18a-006-20190723
- 007 Reference ID: 18a-007-20190723
- 018 Reference ID: 18a-018-20190723
- 039 Reference ID: 18a-039-20190723
- 040 Reference ID: 18a-040-20190723
- 041 Reference ID: 18a-041-20190723

1.4.6 Importantly, Paragraph 039 Reference 18a-039-20190723 states that *“A substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage significance to merit identification as non-designated heritage assets.”*

1.4.7 Furthermore, Paragraph 041 Reference ID: 18a-041-20190723: **‘What are non-designated heritage assets of archaeological interest and how important are they?’** differentiates between two types of non-designated heritage assets of archaeological interest:

1. *Those that are demonstrably of equivalent significance to scheduled monuments and are therefore considered subject to the same policies as those for designated heritage assets.*
2. *Other non-designated heritage assets of archaeological interest. By comparison this is a **much larger category of lesser heritage significance (my emphasis)**, although still subject to the conservation objective.*

GUIDANCE & ADVICE

1.4.8 Industry advice of particular relevance to the Application includes:

- Agriculture: Scheduling Selection Guide (Historic England, 2018)
- Advice Note 12: Statements of Heritage Significance: Analysing Significance in Heritage Assets (Historic England, 2019)
- Local Heritage Listing: Identifying and Conserving Local Heritage. Historic England Advice Note 7 (2nd ed). (Historic England, 2021)
- Good Practice Advice Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015)
- Neighbourhood Planning and the Historic Environment Historic England Advice Note 11 (Second Edition). (Historic England, 2022)

1.5 THE SITE

LOCATION

- 1.5.1 The Site is located to the south of the village of Stubton, c. 13km north-west of the town of Grantham, and c. 5km south-east of the town of Newark on Trent. The Site occupies an area of approximately 0.7 ha and is accessed from the western side from Doddington Lane. The Site comprises a small part of a long rectangular field of c. 2.2 ha orientated north/south parallel to the Doddington Lane. Residential development lies to the immediate north and on the opposing side of Doddington Lane to the east. Open agricultural land is found to the west and south.

GEOLOGY

- 1.5.2 The bedrock geology of the Site consists of Dry Doddington Nodule Bed Mudstone Formation. A sedimentary bedrock formed approximately 191 to 199 million years ago in the Jurassic Period, in a local environment previously dominated by shallow lime-mud seas. No superficial deposits were recorded (British Geological Society, 2014).

2 HISTORICAL DEVELOPMENT

A brief historical background is given here to provide an immediate context to the Application.

- 2.1.1 Place name evidence suggests an Anglo-Saxon origin to the settlement at Stubton, either deriving from the Old English personal name 'Stubba' or 'stubb' meaning tree stump and 'tūn' meaning farmstead or village (University of Nottingham, 2017).
- 2.1.2 The Domesday Survey of 1086 records Stubton as 'Stubetune/Stobetun' in the Hundred of Loveden, with a population of 30 households, placing it within the largest 40% of settlements recorded in the survey. The survey records meadow, ploughland and a church (Powell-Smith, 2011).
- 2.1.3 During the Medieval period, Stubton likely existed as a small rural community, with an subsistence economy primarily based on mixed farming. Extensive areas of Medieval ridge and furrow earthworks have been identified surrounding the present village (Heritage Gateway, n.d.).
- 2.1.4 Documentary evidence also indicates the presence of an earlier church and churchyard in the village, likely the same mentioned in the Domesday Survey, opposite the present front of Stubton Hall. The sole remnant of this church are two bells installed in the later Church of St. Martin and a memorial stone dated 1530 (Stubton Parish Council, Stubton Neighbourhood Plan, 2014).
- 2.1.5 Enclosure of open field systems began relatively early in the area surrounding Stubton, beginning in the 16th century and was largely completed by the early 1800s (South Kesteven District Council, 2007). Subsequently, the village and surrounding areas experienced a period of prosperity during the Post-Medieval period, resulting in the construction of improved farm buildings, such as the barn at Home Farm, opposite the Site.
- 2.1.6 The manor of Stubton was inherited by the Heron family by 1789, building a hall and creating an estate with extensive areas of parkland. The old church close to the hall was pulled down and a new church, the Grade II* Church of St Martin, was built to the east along Brandon Road.
- 2.1.7 In the early 19th century, Sir Robert Heron, MP for Grimsby and later Peterborough, inherited the Stubton Estate. Sir Robert employed Sir Jeffry Wyattville, renowned English architect most famous for his work at Windsor Castle and Chatsworth House, to rebuild the house in a classical style (Stubton Parish Council, Stubton Neighbourhood Plan, 2014).
- 2.1.8 The Stubton Parish Tithe plan of 1837 shows the Site lying to the west of an open trackway (now Doddington Lane), with land to the east seemingly forming one enclosure with the Site, possibly indicating a late date to the southern access into the village. The rigid network of enclosure field systems appears well established on the mapping.

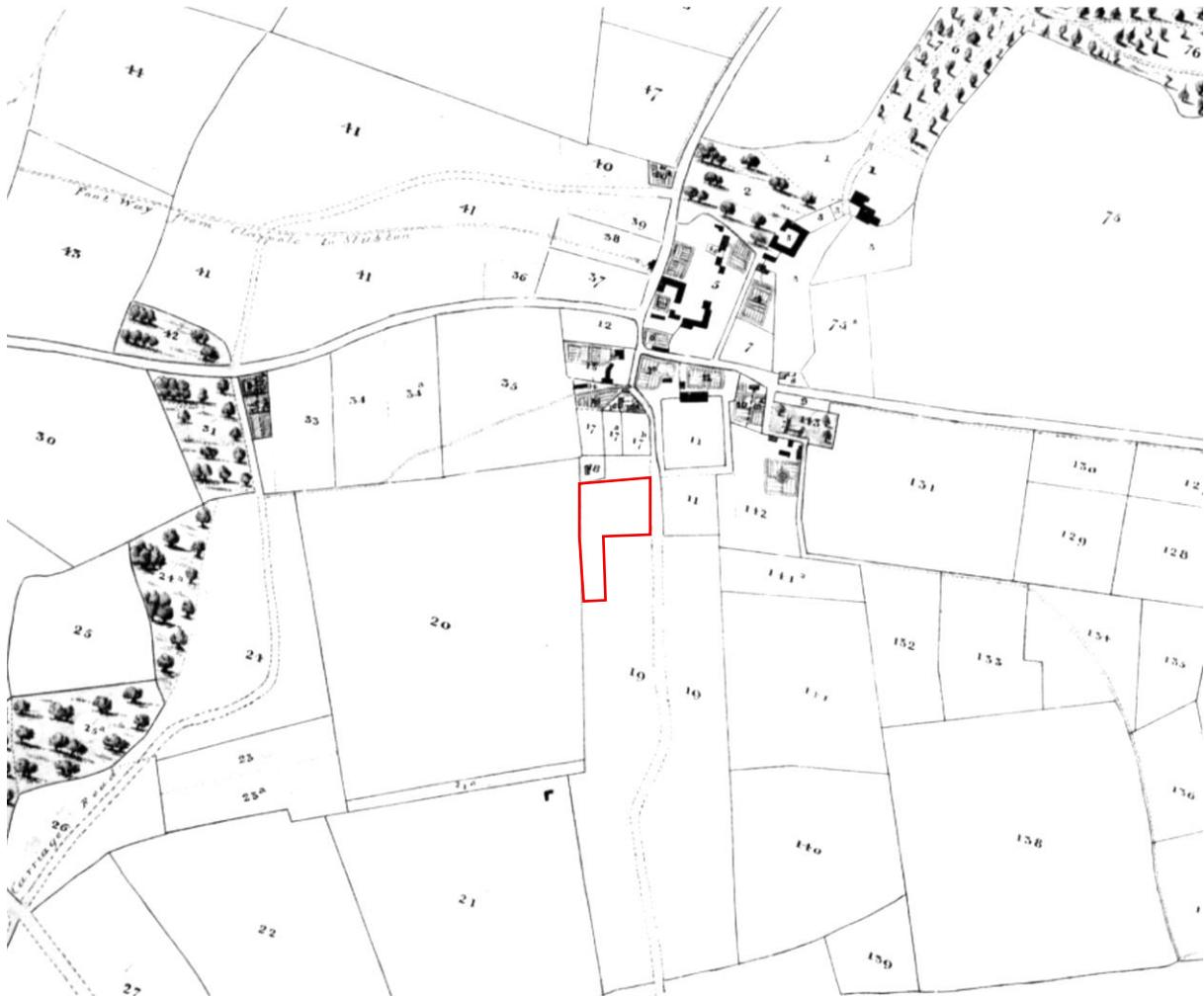


Figure 2 Tithe Map of 1837 with approximate location of Site in red

- 2.1.9 The Tithe Apportionment identifies Sir Robert Heron Bart, the owner of Stubton Hall Estate, as Landowner and Occupier.
- 2.1.10 White's History Gazetteer & Directory of Lincolnshire from 1892 describes Stubton as a small village, and the list of residents consists mainly of farmers, graziers and cottagers, illustrating the continued agricultural nature of the settlement (White, 1892).
- 2.1.11 Review of subsequent Ordnance Survey mapping in 1887, 1905, and 1919 shows no changes to the Site and its immediate surrounds.

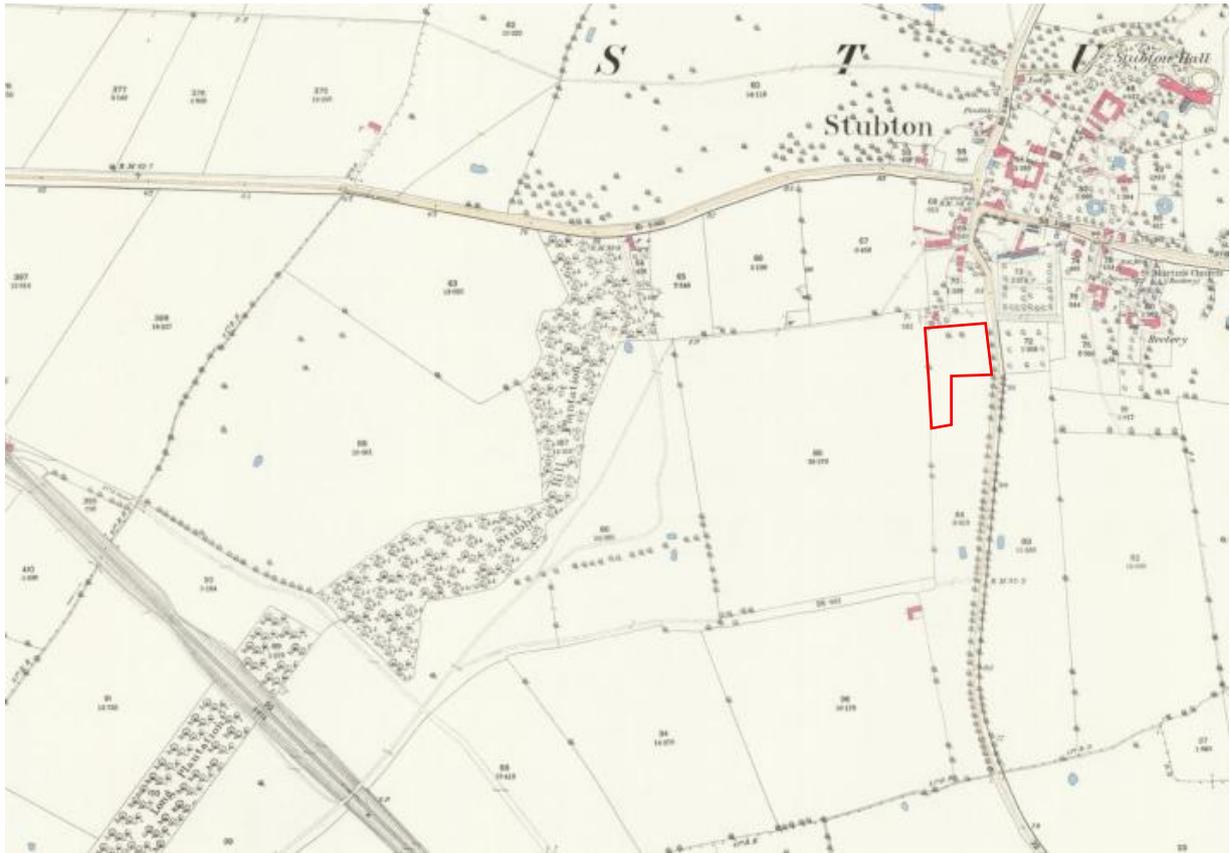


Figure 3 1887 Ordnance Survey 1st Edition Mapping with approximate location of Site in red

- 2.1.12 Only in the late 20th century did Stubton extend to the south, placing modern residential development on the opposing side of Doddington Lane and to the north of the Site.
- 2.1.13 While Stubton retains a rural character today, the agricultural industry in the village has reduced, with many former farm buildings converted to residential use over the course of the 20th and 21st centuries.

3 IMPACT ASSESSMENT

- 3.1.1 This section considers the direct impacts of the proposed development upon the significance of known and potential designated and non-designated heritage assets.
- 3.1.2 The scope of assessment is limited to that of the RFR and gives due respect to Paragraph 207 of the NPPF in efforts to undertake a sufficiently diligent and proportionate approach:
- “In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary.”*
- 3.1.3 No designated heritage assets are located within the Site boundary. The village of Stubton, within which the Site is located, is not designated as a conservation area.
- 3.1.4 With regard to non-designated heritage assets and the RFR, consultation with the South Kesteven District Council website suggests that the Authority does not maintain a ‘local list’ of non-designated heritage assets, nor does it maintain a framework of criteria for their identification.
- 3.1.5 Whilst Neighbourhood Plans are capable of identifying non-designated heritage assets, no such exercise appears to have been undertaken as part of preparing the Stubton Neighbourhood Plan. Acceptably, ridge and furrow earthworks are mentioned in general terms on Page 17 of the Plan under the heading ‘Stubton Character and Style’.
- 3.1.6 Consultation of the Lincolnshire Historic Environment Record (via <https://www.heritagegateway.org.uk>) shows an entry for ridge and furrow earthworks within and to the south of the Site (Monument record: MLI99366).
- 3.1.7 On the basis of the RFR, it therefore appears that the earthworks within the Site have been identified in the course of determining the application for planning permission in accordance with Paragraph 040 Reference ID: 18a-040-20190723 of the PPG. However, it is unclear whether the process has been based on sound evidence or an adopted framework of criteria, as advised by the same PPG paragraph and industry guidance: Local Heritage Listing: Identifying and Conserving Local Heritage. Historic England Advice Note 7 (2nd ed). (Historic England, 2021).

RIDGE AND FURROW EARTHWORKS



Figure 4 View of the Site from the northeast corner looking south

Description

3.1.8 Ridge and Furrow earthworks a common form of earthwork observed across many lower lying rural area in England. They are associated with a once prevalent system of open-field farming that originated in the late Saxon (c.10th century) and persisted into the post-medieval period (c.18th century). They are almost always, if not exclusively, closely associated with a settlement of medieval origins.

3.1.9 The origins of ridge and furrow earthworks, their evolution and the different types of landform are well understood, with current knowledge available in a plethora of academic and industry publications. Their character and history is summarised neatly in *Field Systems: Introductions to Heritage Assets* (Historic England, 2018)¹ as per the extract below:

'A regular open-field system is composed of unenclosed cultivation strips methodically arranged within two, three or sometimes more 'great fields', which might extend to the margins of the township or parish. A process of rotation amongst these fields allowed a proportion of the land to lay fallow, and to recoup nutrients through grazing, whilst cultivation continued elsewhere. The individual units or strips within these fields (sometimes termed 'lands' or 'selions'), were normally arranged in coherent blocks of arable or pasture known as furlongs, and separated from others by shallow parallel ditches or by raised ridges or ledges called 'headlands'. The open-field system ensured that resources were distributed among the

¹ <https://historicengland.org.uk/images-books/publications/iha-field-systems/heag204-field-systems/>

inhabitants in a way which necessitated co-operation, with individual farmers holding part-furlongs or individual strips systematically distributed through different parts of a township. Perhaps the most characteristic and widely recognised feature of regular open-field systems, though not unique to this class or period, is the practice of ploughing the individual strips to form patterns of ridges flanked by furrows – reinforcing the separate nature of the strips and facilitating good drainage.

A large proportion of surviving medieval ‘ridge and-furrow’ takes the form of a reversed ‘S’ when viewed in plan – a form dictated by the movement of the ox-teams drawing the plough; other ridge and-furrow adheres to a shallow curving C-shaped plan. The furlongs of open fields, where the individual strips terminated, can be as long as 700 m in length: the width of individual ridges varies considerably and may reach as much as 20 m but more recent ridge-and-furrow of narrow form rarely exceeds 5 m in width. Such differences in form are explained by different ploughing techniques or are related to soil type.’

- 3.1.10 Looking to the village of Stubton, which holds origins in the late Saxon period, but was heavily re-planned after the introduction of the hall and estate in the late 18th century, the Site can be seen lying somewhat south of the medieval village that was likely centred on the hall where the former church stood. The Site lay within a much larger open field, and ridge and furrow earthworks around the village can be observed on aerial photographs and LiDAR imagery, showing that the village was served by 3 or 4 large open fields. The LiDAR imagery, which dates from 2022, shows extensive areas of ridge and furrow to the west and south of the village which likely once formed a single open field. Earthworks to the north of the Calypole Road likely relate to another one of the village’s open-field.

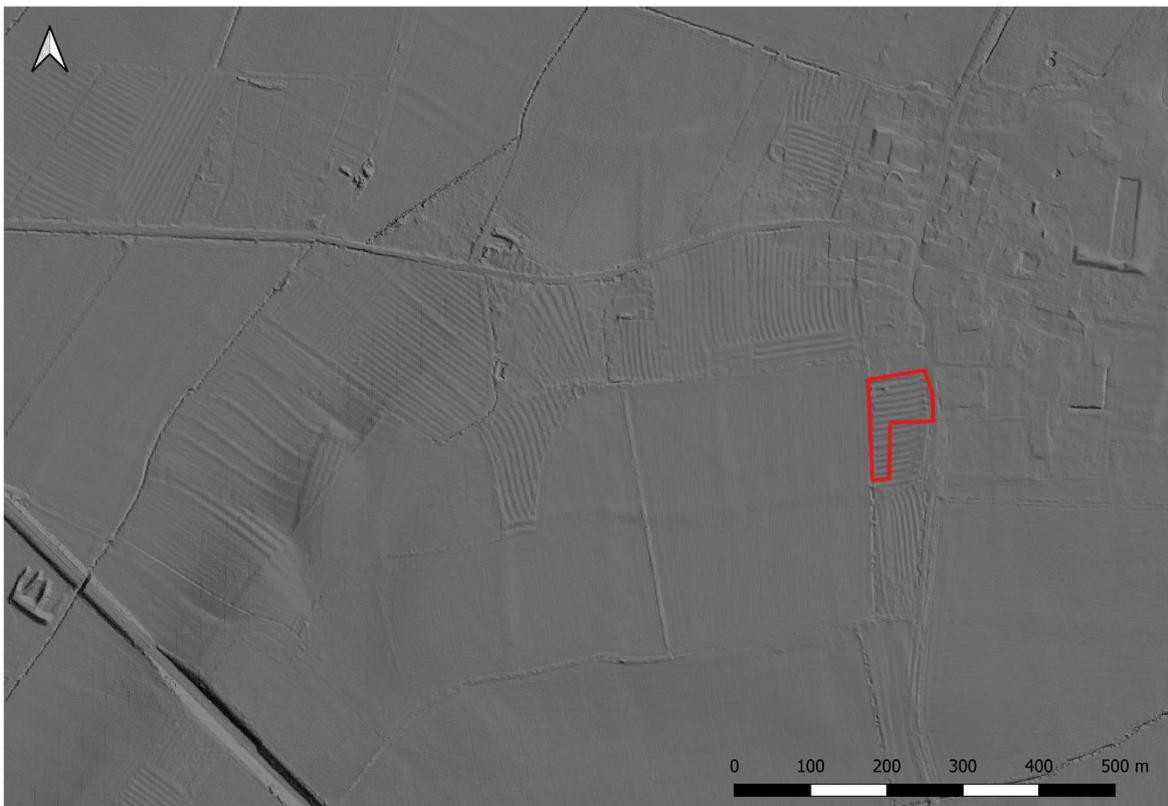


Figure 5 LiDAR imagery of Site (in red) and surrounding area to the south and west of Stubton

- 3.1.11 Looking to the earthworks on the Site, there is an east/west orientation of selion strips in the northern half of the field running parallel to Doddington Lane, and a change in orientation to loosely north/south in the southern half.
- 3.1.12 It is clear that only eastern portions of the selion strips within the Site survive and that these once extended some way to the west. They are now truncated by a later c.18/19th century field boundary. The extensive field beyond (west) is ploughed flat and the former open-field landscape of furlongs and stirps has been overwritten. Whilst the strips and their eastern termini within the Site retain their orientation, they are a fragment of a once much broader furlong that was located in a larger open-field.

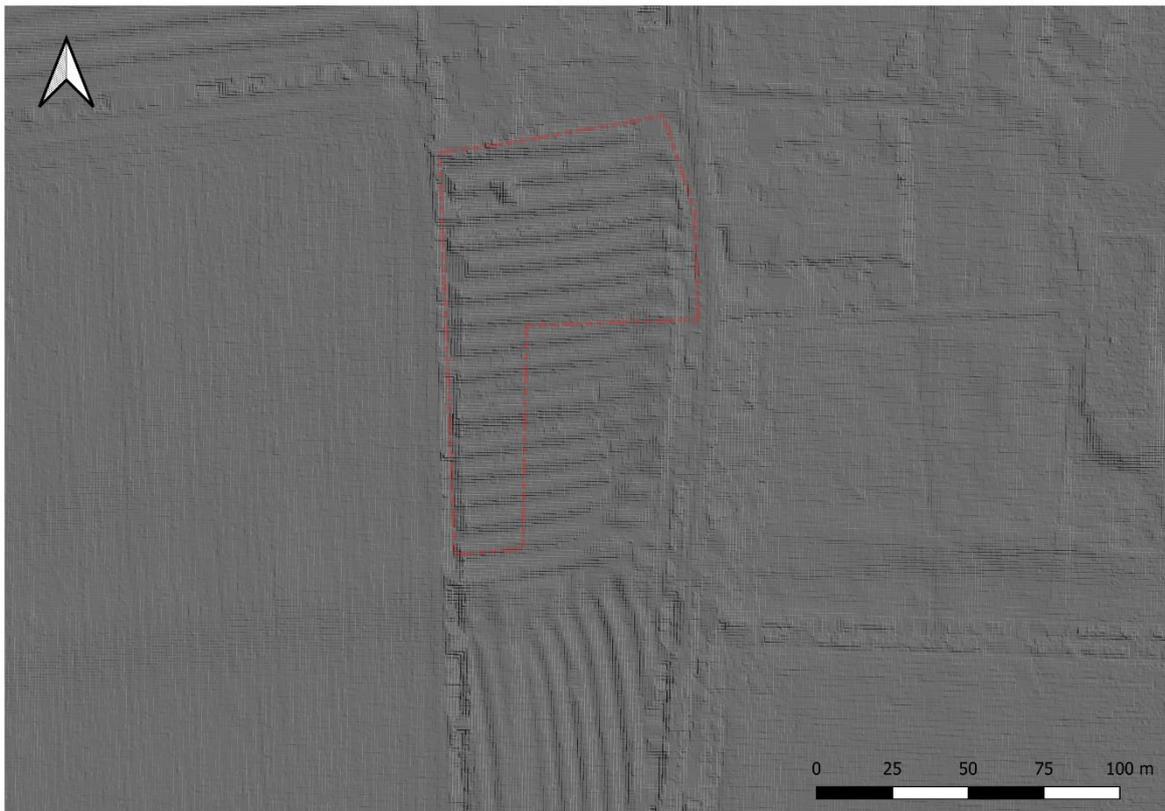


Figure 6 LiDAR imagery of Site (in red dash)

- 3.1.13 The full S shape form of the selion strips within the Site are not apparent due to their truncation, however the eastern termini of the strips remain. To the south there is a change in orientation, perhaps marking the edge of a former furlong, although no raised ridge or ledge in the form of a headland is observed.
- 3.1.14 The earthworks are upstanding features and, in the author's experience, are reasonably identifiable compared to many areas of ridge and furrow, with their repeated amplitude and form easily observed.



Figure 7 View of the southeast corner of the Site looking northwest

3.1.15 Notwithstanding, the area of ridge and furrow also clearly appears as a truncated fragment, and due to the narrow width of the host field, they appear residual.

Significance

3.1.16 'Significance' in terms of heritage-related planning policy is defined in the [Glossary of the National Planning Policy Framework](#) as 'the value of a heritage asset to this and future generations because of its heritage interest.' The PPG and NPPF clarify that 'in the planning context heritage interest may be archaeological, architectural, artistic or historic'.

Archaeological Interest

3.1.17 The NPPF Glossary states: 'There will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.'

3.1.18 The morphology and evolution of ridge and furrow earthworks are well-understood, and study of the partial remains of the earthworks within the site are unlikely to remarkably further our understanding of agriculture in the medieval period. A Level 1 or 2 Earthwork Survey² would likely capture much of archaeological interest of the non-designated heritage asset, with more detailed study, such as through archaeological investigation, unlikely to add meaningfully to the extensive corpus of evidence already held about such monuments.

² historicengland.org.uk/images-books/publications/understanding-archaeology-of-landscapes/heag142-understanding-archaeology-of-landscapes/

3.1.19 As such, the ridge and furrow earthworks have a very low level of local archaeological interest.

Architectural and artistic interest

3.1.20 The NPPF Glossary states: *'These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture.'*

3.1.21 As a landform, ridge and furrow earthworks are remains of a functional landscape. Their location, shape and appearance were not intentionally conceived to be aesthetically pleasing. Consequently, the ridge and furrow earthworks are not considered to hold any Artistic interest, nor any designed-aesthetic value.

3.1.22 Notwithstanding, as relict features of agriculture of the Middle ages, ridge and furrow earthworks have become valued aspects of rural landscapes, as demonstrated by their inclusion as a valued feature in the Stubton Neighbourhood Plan. That value is often heightened when the earthworks are seen in the context of other heritage assets, such as a church spire or deserted medieval village. Over the passage of time, the repeated sinuous form of earthworks can therefore be said to have taken on a degree of architectural interest due to their fortuitous- aesthetic value.

3.1.23 Due to their partial and residual nature, the earthworks on the Site have a very low level of local architectural interest. Due to their truncation, their form does not convey the classic curvilinear 'S' or 'C' shape, nor do they together form a feature or visual composition in the landscape or remarkable aesthetic appeal.

Historic interest

3.1.24 The NPPF Glossary states *'An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.'*

3.1.25 As one of the most common features of our low lying agricultural landscapes, ridge and furrow earthworks are immediately illustrative of medieval agricultural practices. Where forming a complex of furlongs, the earthworks can demonstrate how land was subdivided amongst local communities for the purposes of open-field farming as part of a subsistent village economy.

3.1.26 As upstanding features of farming land in common, ridge and furrow earthworks do not hold any associative value, due to their connections with a person, event or specific place.

3.1.27 The ridge and furrow earthworks on the Site are illustrative of the nature of open-field farming to the south of the village of Stubton. Their position in the landscape provides an indication of where one of the 3 or 4 open fields lay in relation to the village core. They are however, truncated and partial remains of a once vast field system. The earthworks fail to afford much insight into how the wider area of land to the south of the village was subdivided or farmed in the medieval period. As such, they can be said to have a low level of local historical

interest, surviving more as a legacy of a past land use than a clear indicator of agricultural practices.

Overall Significance

- 3.1.28 With specific respect to the level of significance of the earthworks, the Agriculture: Scheduling Selection Guide (Historic England, 2018) offers a useful insight. The guidance indicates that due to its often extensive nature, ridge and furrow has not typically been scheduled as it introduces strict controls over land that is actively farmed (Page 24). However, where designated, examples typically had a 'clear association with contemporary settlement remains'. Loss of ridge and furrow since the 1970s is highlighted as a concern and '*the protection of more examples may be warranted*'.
- 3.1.29 It is clear, both from the scheduling criteria and the synopsis set out within Field Systems: Introductions to Heritage Assets (Historic England, 2018), that the value of ridge and furrow is as a landscape feature that is composed of more than a group of selion strips, but a former open field of multiple subdivisions such as furlongs, headlands, ditches and ridges associated with a medieval village centre. Further value comes from a clear association with a medieval centre, either still evident today or as a deserted settlement, where the functional associations between the two remain apparent.
- 3.1.30 In the case of the Site, the surviving ridge and furrow earthworks are a small, truncated and residual piece of a once extensive open-field landscape. They do not have any remarkable or immediate association with a contemporary settlement remains in the village, owing in part to the extensive re-organisation of the village in the late 18th century and subsequent residential development over the course of the 20th and 21st centuries.
- 3.1.31 Given their truncated form as a residual feature of a furlong and former open field, the ridge and furrow earthworks are not of sufficient interest to be identified as a designated heritage asset as per Footnote 75 of the NPPF. As such, and accepting their low level of local significance, that earthworks fall into the second category of non-designated heritage assets of archaeological interest as defined by Paragraph 041 Reference ID: 18a-041-20190723 of the PPG. As set out by the Guidance, this is a much larger category of lesser heritage significance, although still subject to the conservation objective.

Impact

- 3.1.32 The proposed development will lead to the partial loss (up to c.25%) of the field of ridge and furrow earthworks within which the Site is located. Retention of earthworks within open garden space and the area given over to BNG may see this figure reduce.
- 3.1.33 Due to the location of the Site at the northern end of the field, those earthworks to the south, including a change in orientation in the selion strips will be preserved.
- 3.1.34 Overall, the proposed development will have a low to moderate impact upon the non-designated heritage asset of low local significance.

4 CONCLUSIONS & POSITION

CONCLUSIONS

- 4.1.1 The Site does not include or form part of any designated heritage assets.
- 4.1.2 Ridge and furrow earthworks within the Site are identified as a non-designated heritage asset. As a residual and truncated series of selion strips that once formed part of a furlong, itself within a wider open field, the earthworks are of a low level of local significance.
- 4.1.3 The proposed development would lead to the partial loss of the non-designated heritage asset, bringing about a low to moderate degree of harm to its significance.
- 4.1.4 In bringing about a low impact upon a non-designated heritage asset of a low level of local significance, the effects of the proposed development should be weighed in the planning balance according to Paragraph 216 of the NPPF alongside Policies EN6 of the South Kesteven Local Plan (adopted January 2020) and NE2 of the Stubton Neighbourhood Plan (adopted 2014).

REVIEW OF RFR

- 4.1.5 For ease the RFR is reproduced in full below, with specific sections highlighted in bold which are my emphasis:

*'The application proposals would result in the **total loss of an area of ridge and furrow (my emphasis)**, which is defined as a non-designated heritage asset and is recognised as a key character of the rural landscape character identified in the made Stubton Neighbourhood Plan. As a result, the application proposals would result **in substantial harm to the significance of a non-designated heritage asset (my emphasis)** and the **public benefits of the scheme, including the provision of housing, which is identified as a significant benefit, would not outweigh the identified harm (my emphasis)**, due to the limited weight attributed to the provision of 4 dwellings. As such, the application proposals are contrary to Policy EN6 of the adopted South Kesteven Local Plan 2011-2036 (Adopted January 2020), Policy NE2 of the Stubton Neighbourhood Plan and Section 16 of the National Planning Policy Framework.*

The development proposed would conflict with the development plan when taken as a whole, and material considerations are insufficient to indicate that the decision should be otherwise than in accordance with it, including the presumption in favour of sustainable development contained in the Framework.'

- 4.1.6 The assertion that the proposed development would bring about the 'total loss' of an area or ridge and furrow is clearly inaccurate in relation to the non-designated heritage asset which is a landscape feature comprising a large linear field of some 2.2 Ha. The Site occupies approximately 0.7 Ha and therefore the maximum loss of the upstanding earthworks would be c.30%, and in principle this may be reduced by the retention of the features (e.g. into garden space). The change in orientation between earthworks in the centre and south of the Site would be retained, with the legibility of the earthworks reduced, but not lost, as asserted by the RFR.

- 4.1.7 The RFR states that the proposed development would bring about ‘substantial harm’ to the non-designated heritage asset. In this specific respect, the Inspector is respectfully drawn to the specific wording of Paragraphs 212 through 216 of the NPPF which are unequivocal in that the test for substantial harm applies to designated heritage assets only, and that harm to non-designated heritage assets is a matter considered according to Paragraph 216.
- 4.1.8 Moreover, as per Paragraph 018 Reference ID: 18a-018-20190723 of the PPG, substantial harm is a ‘high test’. Importantly, the High Court Judgement *Pugh v Secretary of State for Communities and Local Government* [2015] EWHC 3 (Admin) establishes that substantial harm (to designated heritage assets) arises where significance is either totally destroyed or very much reduced, but this remains a matter of professional and planning judgment, guided by the asset’s significance, not simply by the scale of physical change.
- 4.1.9 Accounting for the significance of the non-designated heritage asset as a relict and truncated landscape feature alongside the extent of the proposed development, the degree of harm that arises cannot be described as severe or substantial, such that the significance of the asset is destroyed or very much reduced. The RFR therefore misapplies NPPF policy and exaggerates the degree of harm arising to the non-designated heritage asset.
- 4.1.10 The miss-application of NPPF policy extends further into the balancing exercise, with the RFR concluding that the ‘*significant benefits*’ of the housing provision ‘*would not outweigh the identified harm*’. Whilst the requirement to outweigh is apparent within those NPPF policies associated with designated heritage assets (Paragraphs 214 and 215) the same test does not apply under Paragraph 216 of the NPPF which instead requires the decision-maker to take account of the effect of an application and form a ‘*balanced judgement... having regard to the scale of any harm or loss and the significance of the heritage asset*’.

POSITION

- 4.1.11 Review of the RFR strongly suggests that the balancing exercise set out in Paragraph 216 of the NPPF for non-designated heritage assets has been overlooked in favour of the stricter policies that apply exclusively to designated heritage assets.
- 4.1.12 An evaluation of the impact upon the non-designated heritage asset also shows that the degree of harm arising from the proposed development, as set out in the RFR, has been severely overstated.
- 4.1.13 Accepting that the ‘great weight’ afforded to the conservation of heritage assets applies only to designated heritage assets, the degree of negative weight that can be afforded to the partial loss of an already severely eroded non-designated heritage asset of low local significance in the planning balance is low.

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Mapping

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6 APPENDIXES

APPENDIX 1: ASSESSMENT METHODOLOGY

Aims and Scope

- 6.1.1 The aim of this assessment is to assess the magnitude of any potential impacts which may be imposed upon the historic environment resource by the proposed development.
- 6.1.2 GPA 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015), provides information to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the Planning Practice Guidance (PPG). These include; assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding, neglect and unauthorised works, marketing and design and distinctiveness.
- 6.1.3 For the purposes of assessing potential impact on the setting of heritage assets, the procedures laid out within the Historic England document Historic England Good Practice Advice Note 3: The Setting of Heritage Assets (Historic England, 2017) have been followed.
- 6.1.4 Advice set out within the Historic England documents Conservation Principles, Policies and Guidance (English Heritage, 2008), Management of Research Projects in the Historic Environment: The MoRPHE Project Manager's Guide (Historic England, 2015), and the Chartered Institute for Archaeologists' (CIfA) Standard and Guidance: historic environment desk-based assessment (Chartered Institute for Archaeologists, 2014) have been followed.

The Heritage Resource

- 6.1.5 The heritage resource is divided into two broad categories, designated heritage assets and non-designated heritage assets. Designated heritage assets are considered to be of national and regional importance, whilst non-designated heritage assets are considered to be of local importance.
- 6.1.6 Designated heritage assets consist of:
- World Heritage Sites
 - Scheduled Monuments
 - Listed Buildings
 - Registered Parks and Gardens
 - Registered Battlefields
 - Protected Wreck Sites
 - Conservation areas (for the purposes of this assessment, Conservation areas will be included as designated heritage assets)
- 6.1.7 The various elements of the heritage resource have been taken into account, and the potential development impacts upon them considered.

Sources

6.1.8 The following sources of heritage and planning data and information were consulted as a minimum:

Designated Heritage Asset data

6.1.9 These datasets are available from Historic England and contain data on all recorded designated heritage assets in England, i.e., World Heritage Sites, Scheduled Monuments, Listed Buildings, Registered Parks and Gardens, Registered Battlefields and Protected Wreck Sites. The data were consulted in October 2025..

Non-designated heritage Asset data

6.1.10 South Kesteven District Council do not appear to maintain a Local List of Heritage Assets or a framework of evaluation criteria.

Historic Environment Data

6.1.11 A formal search of the Lincolnshire HER was not undertaken for the purposes of the appeal. Historic Environment Records were retrieved from a search of the Heritage Gateway on 21/10/2025.

Cartographic Sources

6.1.12 Historic mapping was obtained online. Information from historic maps, other than tracing the above-ground development of a Site or place, can assist in the assessment of archaeological potential by highlighting previously unrecorded features, enabling an understanding of how the land has been managed in the recent past and identifying areas where development is likely to have removed or truncated below-ground archaeological deposits. All maps consulted are listed in the References section of the main report.

National Legislation and Planning Documents

6.1.13 The treatment of the historic environment within a development and planning context is governed by legislation and national policy set out by the National Planning Policy Framework (NPPF), which itself dictates local authority planning policy. All relevant national and local planning policy documents were consulted in October 2025, and are detailed in Appendix 2.

Assumptions and Limitations

6.1.14 Much of the information used by this assessment consists of secondary information compiled from a variety of sources. The assumption is made that this information is sufficiently accurate.

6.1.15 The local Historic Environment Record is a record of known archaeological and historic environment features. It is not an exhaustive record of all surviving historic environment features and it does not preclude the existence of further features which are unknown at present.

CRITERIA

Contribution to Significance

The contribution that a site or feature makes to a heritage asset's significance is expressed using the criteria below:

Contribution	Degree to which Setting Contributes to Significance of the Heritage Asset
Neutral	The site/area of works makes no contribution to the significance of a heritage asset or its setting
Minor	The Site/area of works forms a modest part of a heritage asset's physical fabric or makes a modest contribution to the experience of a heritage asset's significance from within its setting.
Moderate	The site/area of works forms a notable and positive element of a heritage asset's physical fabric or makes a modest contribution to the experience of a heritage asset's significance from within its setting.
High	The Site/area of works forms an important part of a heritage asset's fabric or enables the experience of an important element of a heritage asset's significance from within its setting.
Very High	The Site/area of works forms a critical part of a heritage asset's fabric or enables the experience of a critical element of a heritage asset's significance from within its setting.

N.B. The character of a development site may already have a detrimental impact upon the significance of a heritage asset to varying degrees which can be expressed using the same terminology above (very high to low). In such instances, development may have the opportunity bring about positive change within the setting of a heritage asset.

Definitions of Impact

The degree of impact of a proposed development upon a heritage asset is defined using the following criteria:

LEVEL OF HARM	DEFINITION
Less than Substantial Harm	
Low	Minor adverse impact upon the significance and/or setting of a designated heritage asset. E.g. loss or partial loss of a valued characteristic of a heritage asset or its setting that is not fundamental or critical to its significance.
Moderate	Medium adverse impact upon the significance and/or setting of a designated heritage asset. E.g. loss or partial loss of a valued characteristic of a heritage
High	High adverse impact upon the significance and/or setting of a designated heritage asset. E.g. loss or partial loss of a valued characteristic of a heritage asset or its setting that is an important or very important, but not fundamental

	or critical, element of its significance. asset it its setting that is very important, if not fundamental or critical, to its significance.
Substantial Harm	
Very High or Substantial Harm	Adverse impact of such a degree that the significance of a heritage asset is entirely lost or a fundamental element of it is vitiated.

The terms above, with exception of substantial harm, also apply to the impact of a development upon non-designated heritage assets.

N.B. Similar hierarchical language (low, moderate, high, very high) and criteria of impact applies to the beneficial outcomes of a proposed development.

APPENDIX 2: PLANNING POLICY

Table 1 National Planning Policy Framework (NPPF) relevant to the proposed development (adopted 2012, revised 2024)

Title	Content
<p>NPPF Chapter 16, Paragraph 202</p>	<p>Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value⁷³. These assets are an irreplaceable resource, and should 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.</p> <p>Footnote 74: <i>The policies set out in this chapter relate, as applicable, to the heritage-related consent regimes for which local planning authorities are responsible under the Planning (Listed Buildings and Conservation Areas) Act 1990, as well as to plan-making and decision-making.</i></p>
<p>NPPF Chapter 16, Paragraph 201</p>	<p>Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:</p> <ul style="list-style-type: none"> d) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation; e) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring; f) the desirability of new development making a positive contribution to local character and distinctiveness; and g) opportunities to draw on the contribution made by the historic environment to the character of a place.
<p>NPPF Chapter 16, Paragraph 207</p>	<p>In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</p>
<p>NPPF Chapter 16, Paragraph 208</p>	<p>Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a</p>

	heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.
NPPF Chapter 16, Paragraph 209	here there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.
NPPF Chapter 16, Paragraph 210	In determining applications, local planning authorities should take account of: <ul style="list-style-type: none"> a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness.
NPPF Chapter 16, Paragraph 212	When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
NPPF Chapter 16, Paragraph 213	Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of: <ul style="list-style-type: none"> a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional; b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional. <p><i>Footnote 75: Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.</i></p>
NPPF Chapter 16, Paragraph 214	Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply: <ul style="list-style-type: none"> a) the nature of the heritage asset prevents all reasonable uses of the site; and

	<p>b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and</p> <p>c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and</p> <p>d) the harm or loss is outweighed by the benefit of bringing the site back into use.</p>
NPPF Chapter 16, Paragraph 215	Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
NPPF Chapter 16, Paragraph 216	The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
NPPF Chapter 16, Paragraph 217	Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.
NPPF Chapter 16, Paragraph 218	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. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.
NPPF Chapter 16, Paragraph 219	Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.
NPPF Chapter 16, Footnote 45	Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.

Table 2 Policies extracted from the South Kesteven Local Plan (adopted January 2020), relevant to the proposed development and the historic environment.

Policy	Content
EN6	<p><u>The Historic Environment</u></p> <p>The Council will seek to protect and enhance heritage assets and their settings in keeping with the policies in the National Planning Policy Framework.</p> <p>Development that is likely to cause harm to the significance of a heritage asset or its setting will only be granted permission where the public benefits of the proposal outweigh the potential harm. Proposals which would conserve or enhance the significance of the asset shall be considered favourably. Substantial harm or total loss will be resisted.</p> <p>Proposals will be expected to take Conservation Area Appraisals into account, where these have been adopted by the Council.</p> <p>Where development affecting archaeological sites is acceptable in principle, the Council will seek to ensure mitigation of impact through preservation of the remains in situ as a preferred solution. When in situ preservation is not practical, the developer will be required to make adequate provision for excavation and recording before or during development.</p>

Table 3: Policies extracted from the Stubton Neighbourhood Plan (adopted 2014), relevant to the historic environment and the proposed development

Policy	Content
NE2	<p>New development must be appropriate to the character, natural historic and cultural attributes and features of Stubton’s landscape. Developments must respect and retain the landscape character of Stubton Parish and incorporate features which contribute to the conservation, enhancement or restoration of these features.</p> <p>In particular, new development should, wherever possible:</p> <ul style="list-style-type: none"> • Maintain existing hedgerows, trees and woodland and encourage the planting of new trees and hedgerows. Where new trees are proposed, these should wherever possible, be appropriate disease resistant and native species. • Protect and enhance the existing landscape character and the important features that define the character, setting and views of the Parish (as set out within the Stubton Landscape Character Assessment). In particular, development which would impact on views into and, where appropriate, out of the village should demonstrate that these features have been sensitively and appropriately considered and incorporated/mitigated as necessary.

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