



Historic England

Ms Clare O'Hanlon
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Direct Dial: 0207 973 3644

Our ref: P01106573

13 October 2019

Dear Ms O'Hanlon

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**LAND ADJ TO PROMISED LAND FARM, WENDLEBURY ROAD, CHESTERTON,
OXFORDSHIRE
Application No. 19/01740/HYBRID**

Thank you for your letter of 9 September 2019 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Historic England Advice

I understand that this is an application in hybrid form (part full and part outline). It seeks outline planning permission for up to 23,400 square meters of employment floorspace (Use Classes B1a and/or B1b and/or B1c) and full planning permission for a Health and Racquets Club on Site A. Although the two applications are separate, many of the supporting documents provided are common to both developments, including the Design and Access statement, the Environmental Statement, and the heritage documents (Written scheme of Investigation for and report on Evaluation (2019); Heritage Desk-Based Assessment (2016; hereinafter DBA)).]

The development site lies immediately north of the scheduled monument known as Alchester Roman Town, list no 1006365. The monument consists of the buried remains (with some upstanding earthworks) of a town founded in the mid-1st century partially on the site of an earlier Claudian fortress. Excavations have shown occupation until at least the late 4th century AD.

Significance of a heritage asset is normally considered as being the sum of its heritage values - evidential, historic (illustrative and associative), aesthetic and communal (See *Conservation Principles*, Historic England, 2008). Consideration of significance concerns not just the heritage asset itself, but also any contribution made to



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significance by the setting of the asset, where setting means the environs in which the asset is experienced. (Historic England, *The Setting of Heritage Assets*, Historic Environment Good Practice Advice in Planning Note 3, 2015).

The evidential value of Alchester is clearly very high, due to the complex and extensive archeological remains. While it has only minor aesthetic value (it is open farmland) and only some communal value (local interest, including from local interest groups, and potential to increase this from the growing population of the area), it does have associative and illustrative historic value. The former comes from association with the Romans and particularly with the key historical event of the Roman invasion (the early fortress), and the latter from the earthworks, the shape of the town, and its relationship to a crossing of two main Roman roads. Setting of the town contributes to the illustrative value where agricultural land survives around the monument, as this serves to illustrate the Roman setting.

The development will infill some of the open land adjacent to the monument and therefore has the potential to impact on the significance of the scheduled monument, as contributed to by its setting. This was recognised and clearly stated in para, 7.6 of the Heritage DBA prepared in 2016. However, the Environmental Statement excludes built heritage and archaeology on the grounds that they were: '*not likely to give rise to significant environmental effects*' (ES, *Non-Technical Summary*, 3.2). This decision derives from an informal scoping note prepared in 2018. No formal scoping opinion was sought from your council, and Historic England were not consulted at any point, despite the adjacent scheduled monument and despite consultation with HE being recommended in the DBA. The submitted Planning Statement contains a short section which asserts that the development will cause not harm to the monument's significance, but provides no supporting information in the way of view analysis, wireframe outlines etc.

In the light of the issues raised above I advise that you should consider whether the Environmental Statement is adequate and fulfils the requirements of the Town and Country Planning (Environmental Impact Assessment) Regulations, 2017. Notwithstanding that issue, I advise that assessment of the impact as submitted is inadequate and that you should not determine the application until further information has been submitted. The following points are relevant:

- Potential impact should be properly assessed taking account of the significance as discussed above. Sufficient view analysis and or wireframe views should be provided for the impact on views, particularly views out from the monument, to be understood.
- Consideration of existing screening should consider impermanence and seasonality, as recommended in Historic England's setting guidance quoted above.



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- Any relevant sections of the ES should be considered and cross-referenced, eg the noise and lighting assessments. A Strategic Landscape Assessment was also submitted separately from the ES - this does have one viewpoint within the scheduled monument but discussion of that viewpoint does not mention the monument. The monument should be recognised as a sensitive receptor.
- Section 7.7 of the DBA confuses setting (meaning how a monument is experienced) with historical context. Any resubmitted information should correct this misunderstanding.
- Proposals for Site B show a narrow no-build zone between the proposed buildings and the edge of the site bordering the scheduled monument. It is not clear as to what role this is intended to perform in relation to the monument, if any.

With regard to undesignated archaeological remains within the site, the Oxfordshire County Archaeology Service will provide detailed advice.

Recommendation

Historic England objects to the application on heritage grounds.

The application does not contain adequate information for the purposes of paragraphs 189 and 190 of the National Planning Policy Framework (NPPF) 2019. I advise that the application does not currently comply with the NPPF. Other sections of the NPPF including paragraphs 194 (requirement to justify harm) and 196 (requirement to balance harm against public benefit) may become relevant once the level of harm or benefit has been properly assessed.

Policy Bicester 10 of the Bicester local plan requires: *Conservation and enhancement of the setting of Alchester Roman Town Scheduled Ancient Monument and the setting out of opportunities to better reveal its significance.* At present, the application does not contain sufficient information to determine whether the development would comply with this policy.

Your authority should take these representations into account in determining the application. If you propose to determine the application in its current form, please inform us of the date of the committee and send us a copy of your report at the earliest opportunity.

Please contact me if we can be of further assistance.

Yours sincerely



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