

**Application no: 21/02467/F**

**Location: OS Parcel 0005 And Part OS Parcel 1300 0878 And 7566, Banbury**

---

## **Archaeology**

### **Recommendation:**

Objection

### **Key issues:**

An updated archaeological desk-based assessment will need to be submitted along with any planning application for the site in line with the National Planning Policy Framework (NPPF 2021) paragraph 194.

### **Legal agreement required to secure:**

### **Conditions:**

Further information will need to be submitted in line with the NPPF (2021) before we can advise whether conditions are appropriate.

### **Informatives:**

### **Detailed comments:**

The site is located in an area of archaeological interest with Neolithic pits and a large Neolithic linear feature recorded 650m to the north along with a Roman settlement. A Bronze Age enclosure has been excavated 800m north west of the site and Bronze Age settlement evidence has been recorded 900m west of the proposed site. Iron Age settlement has also been recorded west of this proposal in the same area. A large enclosure has been identified from aerial photographs 500m north west of the proposed site which is thought to be of later prehistoric date based on its form.

In advance of a previous application for the site (19/00128/HYBRID) an archaeological geophysical survey and trenched evaluation has been undertaken on the site itself which recorded a range of archaeological deposits. These surveys recorded two areas of Roman activity, to the north and south of the evaluation site. Although the features identified mainly related to ditches for enclosures and field systems the evaluation report consulted that these were 'in relatively proximity to habitation'. The evaluation

report also highlighted that the levels of made ground on the site had not impacted on archaeological deposits and so there was likely to be more archaeological deposits on the site which had not yet been identified.

The evaluation was undertaken to assess the potential for archaeological features to survive on the site and physical investigation of these features was only undertaken to a sufficient level to characterise any such deposits and did not attempt to fully mitigate them in advance of development. This is a standard approach to such archaeological as has been the case since the introduction of PPG 16 in 1991.

We recommend conditions for a programme of mitigation on this site as part of planning application 19/00128/HYBRID, but the planning officer felt that the evaluation had appropriately mitigated the site and did not attach any conditions. This was not only against our advice but also failed to take into account the details within the evaluation report itself which clearly demonstrated that, due to ground water ingress, the evaluation was unable to investigate any of the features in parts of the site it had identified. This was therefore not in line with national standards or the NPPF.

An archaeological desk-based assessment has been submitted with this application. This is dated 2017 however and as such is based on out-of-date information. In addition, this assessment does not even mention the geophysical survey and trenched evaluation that has been undertaken on the site itself. These surveys form a significant part of the understanding of the archaeological interest on the site as set out in paragraph 194 of the NPPF (2021). As such this is a significant omission from this desk-based assessment.

As such this assessment does not set out, describe, or appropriately assess the impact of this development on the archaeological deposits known to be present within the site.

An updated archaeological desk-based assessment will need to be submitted along with any planning application for the site in line with the National Planning Policy Framework (NPPF 2021) paragraph 194. This assessment will need to include up to date Historic Environment Record information, including the details of the geophysical survey and trenched evaluation undertaken on the site itself. The assessment will also need to fully set out how it is considered that the evaluation work undertaken is considered to have fully mitigated the site, taking into account the very small sampling level of trenching and the evaluation reports statements that there is likely to be further previously unidentified archaeological deposits on the site and that a number of trenches were unable to be investigated due to flooding issues.

This assessment will need to be undertaken in line with the Chartered Institute for Archaeologists standards and guidance for desk-based assessments including the submission of an appropriate written scheme of investigation to agree the scope of the assessment.

Once this updated report has been submitted, we will need to be consulted in order that we can provide further archaeological advice.

**Officer's Name: Richard Oram**  
**Officer's Title: Archaeology Lead**  
**Date: 16-8-21**