

Application no: 21/03644/OUT

Location: OS Parcel 6372 South East of Milestone Farm, Broughton Road, Banbury

Archaeology

Recommendation:

Objection

Key issues:

See below

Detailed comments:

The site is located in an area of archaeological interest to the west of an area of Roman settlement identified during a housing development. A series of archaeological features consisting of enclosures and linear ditches have been identified from a geophysical survey immediately south of this proposed site.

We have previously provided pre-application advice for this site under the reference number 21/02152/PREAPP where we highlighted that an archaeological desk-based assessment, undertaken in line with an appropriate written scheme of investigation to agree the scope of the assessment, would need to be submitted as part of any planning application. We also highlighted that the results of an archaeological evaluation would need to be submitted with any application.

The applicant has submitted an archaeological desk-based assessment (DBA). Whilst this assessment states that it was undertaken in accordance with the Chartered Institute for Archaeology standards and guidance this was not the case. The assessment has omitted a number of important resources, set out in the ClfA's standard and guidance. This assessment was also not undertaken in line with an agreed specification as set out in this standard and as stated in both our pre-application advice and in a letter provided to EDP with the HER data. This would have agreed the scope of the assessment and the range of sources it would need to draw on.

This assessment has reproduced some of the HER data, but this contains serious omissions and fails to mention the evaluation and excavation within the study area to the north of the proposed site for instance. The assessment has also not attempted to include any further data.

Whilst the text refers to the National Mapping Programme the assessment does not include any plotting's of the cropmarks themselves. The assessment has also not

considered an assessment of any aerial photographs, particularly those held by Historic England in the national archives. The assessment however has not even considered online aerial photographic sources.

The absence of Lidar is also a serious omission because this can also clearly identify landscape and archaeological features. The Oxfordshire Historic Landscape Characterisation has also not been considered or included in the assessment. This data was provided to EDP as part of their Her search and this was supplied in a GIS ready to use format and so its omissions is particularly surprising.

The cartographic sources consulted are very limited and there is no indication that the data held by the record office has been considered. The Davis Map of 1797 for instance is not included. Although the assessment mentions the first edition OS map this has not been included in the assessment. Only one historic map is included in the assessment.

Overall, the DBA offers nothing to assist the determination of the application in terms of the historic environment.

An acceptable 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 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.

A programme of archaeological investigation will be required ahead of the determination of any planning application for the site. This investigation must be undertaken in line with the Chartered Institute for Archaeologists standards and guidance for archaeological evaluation including the submission and agreement of a suitable written scheme of investigation.

In the absence of an acceptable desk-based assessment and archaeological evaluation we would recommend that this application is refused.

Officer's Name: Richard Oram
Officer's Title: Archaeology Lead
Date: 3-11-21