

LONDON OFFICE

Ms Samantha Taylor Cherwell District Council Bodicote House Bodicote Banbury OX15 4AA

Direct dial: 020 7973 36

Our ref: PL00762524

Your ref:21/04187/SCOP

24th January 2022

Dear Ms Taylor

Re: 21/04187/SCOP ENVIRONMENTAL IMPACT ASSESSMENT (EIA) SCOPING REPORT

LAND SOUTH OF PERDISWELL FARM, SHIPTON ROAD, SHIPTON ON CHERWELL

Thank you for your letter of 6th January 2022 consulting us about the above EIA Scoping Report.

We welcome the fact that, in line with advice in the National Planning Policy Framework (NPPF), the proposed EIA has included archaeology and cultural heritage, to assess the likely effects which the emerging development might have upon a number of designated heritage assets and their settings falling within or lying in close proximity to the site.

In particular, we consider that the following heritage assets, identified in the EIA for assessment, are the most relevant to the site:

- Blenheim Villa, scheduled monument (HE entry n. 1021367), and associated field system, falling within the south-western section of the site;



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- Blenheim Palace World Heritage Site (HE entry n.1000091) consisting of numerous listed buildings and several scheduled monuments set within the Grade I registered park and garden (HE entry n.1000434), adjacent to the site's western boundary;
- Woodstock Conservation Areas situated to the north-west of the site's perimeter, and
- Bladon Conservation Areas situated to the south-west of the site's perimeter.

With reference to Bleheim Villa, as part of a previous unsuccessful application including the current site (planning ref. 14/02004/OUT), a programme of desk-based and field evaluation was carried out in 2014 by Thames Valley Archaeological Services Ltd to examine the parcel of land surrounding the scheduled monument.

The geophysical survey established the full extent of the Roman Villa complex which stretches beyond the area of the scheduled monument. It also identified two areas of archaeological potential, comprising a linear zone, including the scheduled monument, aligned approximately north-south along the historical Anglo-Saxon route of 'Heh Straet', and a second zone corresponding with another late Iron Age/Roman complex to the north east.

In addition, finds of medieval materials have also been recorded from this field and, being adjacent to Blenheim Palce WHS, the entire site may have the potential to contain further, yet unrecorded, remains of almost any period.

Given the high archaeological potential and the fact that the site has been only partially investigated, further information would be required on the presence/absence of non-designated heritage assets across the site, which may be of equivalent significance to scheduled monuments. This would be necessary for properly assessing the heritage implications of any emerging development proposals and drawing up a scheme to mitigate potential impact on any belowground archaeological deposits.

In this respect, the current EIA proposes to institute a 50m buffer area around Blenheim Villa to safeguard any potentially nationally important archaeology. This approach follows Historic England's consultation response to the former Park View application to the west of the site (16/01364/OUT), where we recommended as a precautionary measure to form a 30m buffer zone around the scheduled monument.



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However, while this strategy is supported in principle, further considerations must be given to the specific character and extent of the current site. It is, therefore, vital that the EIA assesses the impact of any development upon the significance of the scheduled monument that may occur through change to its wider setting.

Although Blenheim Villa has been only partially investigated and is now completely buried, it has been acknowledged that, in common with most other ancient Roman villas, it had a formal ground plan which appears to have been designed to face south-east. As characteristic of this ancient Roman building type connected to the farming economy, the villa was at the center of an agricultural estate, sited to take advantage of extensive views over its dependent land.

Accordingly, attention should be paid to any potential changes to Blenheim Villa's rural setting, and especially to the protection of long-ranging views towards the south-east. Any alteration in this respect would affect this important evidential value, consequently harming a fundamental part of the scheduled monument's significance.

With regard to Blenheim Palace World Heritage Site and the self-contained registered park, being the site in close proximity to their boundary, any development has the potential to affect their setting and needs to be considered in relation to the Conservation Management Plan for the WHS.

Similarly, the effects of development proposals on Woodstock and Bladon conservation areas, are related to potential impact on their significance through change of their setting.

In this respect, we support the strategy proposed in the EIA for assessing the potential heritage implications on the above-mentioned assets through analysis of viewpoints to and from key historic locations, especially on elevated grounds, to be agreed with Cherwell and West Oxfordshire District Councils' conservation officers.

We are also content that the EIA has taken into consideration the potential impact which associated activities, such as construction, servicing and maintenance, as well as disturbance from increase in traffic, noise, lighting and recreational activity might have upon perceptions, understanding and appreciation of the heritage assets in the area.

The assessment should also consider, where appropriate, the likelihood of alterations to drainage patterns that might lead to *in situ* decomposition or



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destruction of below ground archaeological remains and deposits, and can also lead to subsidence of buildings and monuments.

We would strongly recommend that you involve the conservation officers at Cherwell District Council and the archaeological staff at Oxfordshire County Archaeology in the development of this assessment. They are best placed to advise on: local historic environment issues and priorities; how the proposal can be tailored to avoid and minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

If you have any queries about any of the above, or would like to discuss anything further, please contact me.

Yours sincerely

Luciana Gallo

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