Mr James Kirkham Direct Dial: 0207 973 3644

Cherwell District Council

Bodicote House Our ref: P01512394

Bodicote

Banbury

Oxfordshire

OX15 4AA 13 July 2022

Dear Mr Kirkham,

**T&CP (Development Management Procedure) (England) Order 2015**

**& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**LAND NORTH OF MANOR FARM , NOKE**

**Application No. 22/01682/F**

Thank you for your letter of 23 June 2022 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.

**Summary**

Historic England has concerns about this application. Undesignated archaeological remains within the development site have not yet been adequately assessed - see below for further detail. An appropriate level of assessment is required by the NPPF para 194, 195. This should be carried out before the application is decided. Please consult us again when this information is available.

The solar farm would cause less than substantial harm to the scheduled Islip Roman Villa and to the Grade II buildings at Manor Farm. This harm is very much at the minor end of the scale of less than substantial harm but will need to be balanced against public benefit as required by the National Planning Policy Framework 2021 (NPPF) para. 202.

Historic England does not endorse the advice of the Cherwell Conservation team which concludes:

*In this case the harm is so minimal that the proposal is an appropriate location for this proposal from a heritage perspective.* This conclusion cannot be reached when the level of harm is not adequately understood with reference to undesignated archaeological remains within the site (see above). Nor can it be reached before the harm has been balanced against public benefit, as required by the NPPF.

**Historic England Advice**

We understand that this is an application for a solar farm with associated access and infrastructure. The proposed site is located approx. 600 metres east of the scheduled monument known as Islip Roman villa, HA1015161, and north of the Grade II listed agricultural buildings and farmhouse at Manor Farm, Noke (HA1046552; 1193487; 1193475.

**Significance**

The scheduled monument includes a Roman villa of winged corridor type situated within its own enclosure, beyond which lies a larger outer enclosure. The villa faces south on a hillslope situated south east of the confluence of the Rivers Ray and Cherwell. It lies 900m north west of the Woodeaton Romano-Celtic temple. Part excavation in 1962 provided dating evidence for the villa, covering the period from the late 1st century to the early 2nd century AD. Field walking has provided much pottery of later 3rd and 4th century date from the inner enclosure. The villa is aligned WNW - ESE and occupies the north end of its surrounding enclosure. Aerial photographs show that it measures 44m along its main axis and has wings which project 14.5m to the south. At the front (south) of the villa is a 3m wide verandah or portico. At the rear of the villa is an unusual extension. This protrudes through the inner enclosure and gives direct access to the interior of the outer enclosure. It measures 8.4m north-south and 5.3m wide. It takes the form of a single room which is separated from the villa by a 2.3m wide corridor. Further extensions into the outer enclosure at this point suggest that the structure included further rooms which are not clearly understood from the aerial photographs alone.

The principal significance of the villa is vested in its below-ground archaeological remains and the important historical information which they contain. There are no above-ground remains of the villa but the terracing of the villa into the hillside can still be appreciated on the ground, and it is crossed by a public footpath. The southern aspect of the villa, being the direction faced by the wings and portico, is not readily appreciable due to the modern hedgelines. It is however appreciable that the villa must also have had a northern aspect looking out across the valley of the river Ray. (The development site lies in the eastern part of this aspect.) This double aspect may well have been why there are substantial structures at what is described above as the rear (north) of the villa. The northern rural view seen today contributes to the significance of the scheduled monument as it illustrates the deliberate siting of the villa on the high ground, and (broadly speaking) the agricultural surroundings and estate of the villa.

Undesignated archaeological remains are likely to survive within the development site, including Roman settlement and a possible Roman road. This has been investigated with a geophysical survey and partial evaluation (trial trenching). The results of the latter are not included in the planning application. I support the advice of the Oxfordshire County Archaeological Service that this application should not be determined until the evaluation results, including any appropriate evaluation of the rest of the site, have been made available. Please consult Historic England again when these results are available. the NPPF paras 194, 195 requires an appropriate level of assessment to be carried out.

I agree with the conclusion of the applicant’s Archaeology and built Heritage Assessment (AHBA) that such remains could form part of the setting of the Roman villa and contribute to its significance.

**Impact**

The introduction of the solar farm into the landscape will be a minor change to the northern aspect of the villa described above, seen in glimpsed views with slightly more being visible in the winter. This will constitute less than substantial harm to the scheduled monument, but is very much at the minor end of the scale of such harm.

The harm will be temporarily greater during the construction period, both from the development site itself but also from the temporary access road.

For undesignated archaeological remains within the development site, I do not agree with the statement that any harm will be minimal and can be mitigated (AHBA para. 8.7), as the remains have not yet been adequately assessed (see above). The possibility should also be considered that remains might be found of equivalent significance to designated remains, which for planning purposes would have to be treated as if they were designated (NPPF footnote 68).

As regards the Grade II buildings at Manor Farm I concur with the applicant's AHBA (para. 8.5) that there will be less than substantial harm from the change to the setting and that this harm would be at the low end of the scale. I note the advice from the Cherwell Conservation team also predicts only slight harm, however it concludes for the whole development that:

*In this case the harm is so minimal that the proposal is an appropriate location for this proposal from a heritage perspective.* Historic England do not endorse this advice as, firstly, the level of harm is not yet fully established with reference to undesignated archaeological remains within the site (see above). Secondly, the harm will need to be balanced against public benefit before any such conclusion can be drawn, as required by the NPPF para. 202.

For Conservation Areas and other Grade II listed buildings I defer to the advice of the Cherwell Conservation Team with the exception of the general point made above.

paragraphs 194, 195, 197, 199, 200, 202, 203, footnote 68, and 205 of the NPPF are relevant.

**Recommendation**

Historic England has concerns regarding the application on heritage grounds.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely,

*David Wilkinson*

**David** **Wilkinson**

Inspector of Ancient Monuments

E-mail: david.wilkinson@HistoricEngland.org.uk

cc: Victoria Green, Planning Archaeologist, Oxfordshire County Council; Richard Oram, Archaeology Team Leader, Oxfordshire County Council