



Historic England

Mr James Kirkham
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Direct Dial: 0207 973 3644

Our ref: P01512394

4 December 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 regarding further information on the above application for planning permission. On the basis of this information, we offer the following advice to assist your authority in determining the application.

Summary

We previously expressed concerns about this development due to lack of appropriate assessment of undesignated archaeological remains. The results of an archaeological evaluation (trial trenches) have now been submitted, although the Environmental Statement has not been updated to reflect any changes of significance and impact.

The solar farm would cause less than substantial harm to the scheduled Islip Roman Villa and to the Grade II buildings at Manor Farm. The harm would result from change to the settings, including the loss of Roman archaeological remains within the development site. This harm is at the minor end of the scale but will need to be balanced against public benefit as required by the National Planning Policy Framework 2021 (NPPF) para. 202.

Historic England Advice

I 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



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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 hillside 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.

As regards undesignated archaeological remain, geophysical survey and evaluation (trial trenches) have shown a concentration of archaeological remains in the southern part of the application site. A revised version of the evaluation report approved by the Oxfordshire County Archaeological Service had not been uploaded to the planning portal at the time of writing this letter but OCAS have explained the minor changes to me. The applicant has not updated the Environmental Statement with regard to significance and impact.

The remains found are of a pattern of enclosures, trackways and field boundaries possibly beginning in the late Iron Age. There are also quarry pits and some evidence of crop processing. A significant quantity of the pottery is only datable as generally 2nd to 4th century AD. Pottery that is definitely datable leans more towards the 3rd or early 4th centuries. This could suggest the activity is contemporary with later phases of the



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villa. as evidenced by 3rd to 4th century pottery found at villa during fieldwalking. The suspected Roman road was identified in the form of a metalled trackway.

I agree with the conclusion of the applicant's Archaeology and built Heritage Assessment (AHBA, 6.42) that such remains can be considered as forming part of the setting of the Roman villa. They make a minor contribution to its significance. The remains themselves are not of national 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. Loss of the Roman archaeological remains (if not preserved in situ) within the development site will be harmful, and would also constitute very minor harm to the significance of the villa.

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

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 and for all the heritage assets considered, 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 it is not supported by a considered harm / benefit balancing exercise (NPPF para. 202), nor does it take account of undesignated archaeological remains within the site (see above).

Policy

National Policy

Paragraph 199 of the NPPF requires great weight to be given to the conservation of designated heritage assets, regardless of the level of harm to their significance. Paragraph 200 states that any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification. Paragraph 202 requires less than substantial harm to be balanced against public benefits. Paragraph 203 concerns the effect of an application on the significance of a non-designated heritage asset - this should be taken into account in determining the application. Undesignated archaeological remains are covered in paragraph 205: *Local planning authorities should require developers to record and advance*





understanding of the significance of any heritage assets to be lost (wholly or in part)... However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

Local Plan Policy

Policy ESD15 of the Adopted Cherwell Local Plan states that new development proposals should: *Conserve, sustain and enhance designated and non-designated 'heritage assets' (as defined in the NPPF) including buildings, features, archaeology, conservation areas and their settings, and ensure new development is sensitively sited and integrated in accordance with advice in the NPPF and NPPG. Proposals for development that affect non-designated heritage assets will be considered taking account of the scale of any harm or loss and the significance of the heritage asset as set out in the NPPF and NPPG.*

Historic England Position

The solar farm would cause less than substantial harm to the scheduled Islip Roman Villa and to the Grade II buildings at Manor Farm. The harm would result from change to the settings, including the loss of Roman archaeological remains within the development site. This harm is at the minor end of the scale,

Your authority should include this harm when carrying out the balancing exercise of harm / public benefit, as required by the National Planning Policy Framework 2021 (NPPF) para. 202.

With regard to mitigation of harm to the undesignated archaeological remains (should development proceed) we defer to the advice of the Oxfordshire County Archaeological Service.

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



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